

REG CC FUNDS AVAILABILITY POLICY



Under Regulation CC, the Expedited Funds Availability Act, banks must make funds deposited to transaction accounts available for withdrawal according to published schedules. The length of time the hold may be imposed generally depends on the item deposited. The law also mandates that the Federal Reserve establish mechanisms to speed the collection and return of checks, thereby reducing the risks to banks.

Unlike many "consumer" protection laws, Reg. CC does not specifically exclude business purpose deposits. It applies to consumer, fiduciary and business accounts but not to any type of savings accounts, including money market deposit accounts.

POLICY:

It is the general policy of Shamrock Bank, N A, to make funds available on the first business day after the date of deposit. Funds from electronic direct deposits will be available on the day we receive the deposit. In some cases, next day availability will not be given. If funds are held beyond our general availability policy, the customer is given a notice explaining why funds are being held and when they will be available.

The application of allowable exception holds is at the sole discretion of the Bank on an item-by-item basis. Deposits into accounts of new customers have special rules. Customers are provided a funds availability disclosure prior to account opening.

Checks drawn against a foreign bank, in U S funds, are not subject to Reg. CC availability nor are checks drawn against a U S bank denominated in foreign dollars.

Effective July 1, 2006, Reg. CC shifted the burden of loss on unauthorized "remotely created checks" from the paying bank to the depository bank. The paying bank can file suit for breach of contract within one year from the time of the violation, provided the paying bank gives "notice of a claim" to the depository bank within 30 days after being advised of the unauthorized "remotely created check".

Endorsement standards for checks during forward collection adhere to guidelines as set forth in the regulation.

Funds deposited into interest bearing transaction accounts will begin accruing interest on the day they are deposited.

ADOPTED BY BOARD OF DIRECTORS: JULY 2016