

BUSINESS ONLINE BANKING USER GUIDE

ACH Rules for ACH Originators

Each ACH Operator agrees to adhere to the requirements of the NACHA Operating Rules and to other applicable laws, regulations and policies governing the transfer of ACH payments.

ACH Legal Framework

You are required to abide by multiple rules and agreements including, but not limited to, the following when initiating ACH transactions:

- NACHA Operating Rules (www.nacha.org)
- Regulation E (for consumer entries)
- UCC4 (for corporate credits)
- The National Bank of Indianapolis Deposit Agreement and Terms and Conditions
- The National Bank of Indianapolis Treasury Management Services Master Agreement
- Authorizations from employees, customers, etc.
- Bank and Corporate agreements

Your Responsibilities as an Originator

- Obtain proper authorizations, dependent upon the transaction type, and retain authorizations for two years past revocation.
- If requested by the *Bank*, provide a copy of the authorization. The *Bank* may request to see your authorizations from time to time as part of an annual audit.
- Send entries on proper date.
- Give appropriate notice to debtor if changing amount or date.
- Cease subsequent entries when notified.
- Make necessary changes to payee account information within three (3) banking days upon receipt of a Notice of Correction or before another entry is sent.
- Check payees against OFAC compliance checklists.
- Protect the banking information received to originate transactions.
- Ensure your computer and you are protected as outlined in the Treasury Management Services Master Agreement.
- Ensure the Originator is clearly identified as the source of the ACH transaction. Specifically, populate the Company Name Field of the NACHA formatted file with a name known to and readily recognized by the Receiver of the entry.

Questions? Please contact your Treasury Management Banker at 317-261-9000.

