

ACH Origination

Resource Guide

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The information presented is for general information purposes only and is not intended as specific instruction or legal advice. Charts are derived from the Nacha Rules & Operating Guidelines (the “Rules”), but you are solely responsible for compliance with and interpretation of the Rules as periodically amended. Contact your legal or other advisor regarding any issue. You are also responsible for compliance with your agreements with the Bank, including but not limited to the Treasury Management Master Services Agreement and the Deposit Account Agreement.

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ACH ORIENTATION

INTRODUCTION AND PURPOSE

The Automated Clearing House (ACH) network is a secure, efficient system that enables businesses to move funds electronically between financial institutions. ACH origination allows your company to initiate both credit transactions (sending funds to a Receiver's account) and debit transactions (pulling funds from a Receiver's account), streamlining payments and collections while reducing reliance on paper checks. This guide explains the primary uses of ACH, outlines your responsibilities as an Originator, and highlights key rules you must follow to ensure compliance and minimize risk.

The ACH system processes electronic fund transfers quickly and reliably. ACH batches may include a single transaction (such as an account-to-account transfer) or multiple transactions (one account to many), enabling businesses to process payments efficiently. Through ACH origination, companies can disburse funds to:

- Vendors
- Employees via direct deposit
- Collect funds for consumer payments

ACH transfers are also commonly used for:

- Annuities
- Corporate-to-corporate payments
- Dividends
- Interest payments
- Pensions
- Association dues
- Contributions to IRAs and 401(k)s
- Cash concentration
- Tax payments

YOUR ROLE AS AN ACH ORIGINATOR

An ACH Originator is the party authorized by the Receiver to credit or debit the Receiver's account at the Receiving Depository Financial Institution (RDFI). As an Originator, your company is responsible for complying with all applicable Nacha Operating Rules and Guidelines ("Rules"), as well as the terms outlined in the Treasury Management Master Services Agreement and any ACH-related addenda.

ABOUT NACHA

Nacha (National Automated Clearing House Association) manages the development, administration, and governance of the ACH Network. The Nacha Rules define the roles, responsibilities, and risk management practices for all ACH participants, ensuring secure and efficient payment processing. Access the full set of Rules at www.nacha.org.

COMPLIANCE REQUIREMENTS

Failure to comply with the Rules may lead to termination of services and/or fines imposed by Nacha. Additionally, the Bank may contact your company to review and verify your internal ACH procedures and policies.

CREATING A SAFER ACH PROCESS

Electronic payment fraud continues to rise, and our enhanced security measures help mitigate the risk of ACH Origination Fraud. We offer risk management tools designed to strengthen your company's ACH processes.

Safeguards include:

- **Dual Controls** – Establish dual controls within our online systems to maintain separation of duties for creating and approving payment templates as well as initiating and approving transactions.
- **Transaction Limits** – Reduce exposure by setting ACH transaction limits on users and accounts, minimizing the amount of funds at risk in the event of a breach.
- **Daily Review** – Monitor ACH activity regularly by reviewing your ACH transactions through our online Treasury Internet Banking platform to quickly identify and address any irregularities.

AUTHORIZATION

As an Originator, your company must obtain authorization from the Receiver before initiating one or more Entries to or from the Receiver's account. The type of authorization depends on the Entry type and parties involved. Authorizations must:

- Be retained for at least two years after the authorization is terminated.
- Be provided to us promptly upon request as Proof of Authorization (POA).

Your company can customize the authorization to fit your specific needs, but it must be clearly identifiable as a payment authorization and include at a minimum:

- Acknowledgement that Entries must comply with Nacha Rules and applicable U.S. laws.
- Statement authorizing the Originator to initiate credit or debit Entries.
- Account number and routing number of accounts.
- Identification of account type (checking, savings, loan, etc.).
- Provisions for termination of the authorization, including where and how to terminate the authorization, and any automatic termination policies (e.g., due to excessive returns, member abuse, or when a loan has been paid off).
- Date and signature of Receiver.

Best practice: Include express permission to debit or credit the Receiver's account to correct any errors.

For sample authorization forms and information on how the authorization Rules apply to your transactions, refer to the Nacha Operating Rules and Guidelines.

FRAUD MONITORING AND PREVENTION

Fraud in electronic payments continues to rise, and ACH Originators play a critical role in mitigating risk. While no system can eliminate fraud entirely, Nacha Rules require Originators to implement risk-based processes and procedures reasonably intended to identify ACH Entries initiated due to fraud, including those that are unauthorized or authorized under false pretenses.

Requirements for WEB Debit Entries

ACH Originators of WEB debit Entries (consumer debits authorized online or via wireless networks) must implement risk-based fraud monitoring processes to screen WEB debits for fraud. Since March 19, 2021, this requirement explicitly includes account validation as part of the fraud detection processes.

Account validation applies to:

- The first use of an account number for a WEB debit.
- Any change to an account number previously used for a WEB debit.

Nacha does not mandate a specific validation method. Acceptable options include:

- ACH prenotification
- ACH micro-transaction verification
- Commercially available validation service
- API-enabled account validation tools

Enhanced Fraud Monitoring Requirements for All ACH Originators

Effective in 2026, Nacha is requiring enhanced fraud monitoring for all ACH non-consumer Originators and Third-Party Senders, expanding beyond WEB debit Entry origination requirements to cover all ACH transactions.

New Rules (effective in two phases):

Effective in 2026, Nacha requires all non-consumer Originators and Third-Party Senders to implement risk-based processes and procedures to identify fraudulent Entries or Entries initiated under false pretenses (e.g., Business Email Compromise (BEC), vendor, payroll, and other payee impersonation).

Annual Review:

Fraud monitoring programs must be reviewed and updated annually to address evolving risks.

Effective Dates

- Phase 1: **Effective no later than March 20, 2026** – Applies to non-consumer Originators and Third-Party Senders with 2023 ACH origination volume of 6 million or more.
- Phase 2: **Effective no later than June 22, 2026** – Applies to all remaining non-consumer Originators and Third-Party Senders, regardless of volume.

Important Note: Proof of compliance with this Rule as well as other applicable Nacha Rules may be requested by the Bank.

DATA SECURITY

To protect sensitive account information, Nacha's ACH Security Framework requires certain parties to render account numbers unreadable when stored electronically. This Rule applies to non-financial institution Originators, Third-Party Service Providers (TPSPs), and Third-Party Senders (TPSs) with aggregated ACH volume exceeding 2 million transactions annually. Acceptable methods include:

- Encryption
- Truncation
- Tokenization

If account numbers are scanned from paper authorizations and stored electronically, this requirement applies to those records as well.

Important Note: The Rules provide a one-time grace period for newly covered organizations. If an Originator reaches the 2 million annual Entry threshold as of December 31 of the current year, it must comply by June 30 of the following year. Once subject to this requirement, compliance is ongoing, regardless of future origination volume. The Bank may request proof of compliance at any time.

COMPANY ENTRY DESCRIPTION

The Company Entry Description is a field that accompanies an ACH Entry providing a brief description of the purpose of the transaction. This description appears on the Receiver's bank statement and helps the Receiver identify the nature of the payment. Clear and accurate descriptions improve transparency and reduce confusion for account holders.

- Originators must populate the Company Entry Description field with text that accurately reflects the purpose of the transaction. Common examples include PAYROLL, RENT, DUES, PAYMENT, etc.
- The description should be concise and easily recognizable by the Receiver.

Effective no later than March 20, 2026

To enhance fraud prevention and improve transaction monitoring, Nacha is introducing two standardized Company Entry Descriptions for specific Standard Entry Class (SEC) codes:

- **PAYROLL:**
 - Required for PPD (Prearranged Payment and Deposit) credits related to wages, salaries, and similar compensation.
 - The word "PAYROLL" must occupy the first seven (7) characters of the field; the remaining three (3) may be used for additional detail.
 - Applies to all compensation payments, including 1099 contractors and HSA contributions.
 - Use is descriptive only and does not imply employment status.
- **PURCHASE:**
 - Required for WEB (internet/mobile initiated Entry) debits related to e-commerce purchases.
 - The word "PURCHASE" must occupy the first eight (8) characters in the field.

PRENOTIFICATION PROCESS

The prenotification (prenote) process is an important best practice for validating account information before initiating live dollar ACH transactions. While optional under Nacha Rules, prenotes are strongly encouraged because they help confirm routing and account numbers, reduce Notifications of Change (NOCs), and minimize returned items. This improves payment accuracy and reduces costly exceptions.

When an Originator initiates a prenote, it must settle at least three banking days prior to the first live dollar transaction to the same Receiver. If no response is received by the end of the third banking day, the Originator may proceed with live transactions. However, if a Return or NOC is received, the Originator must correct the records before sending any live dollar Entries. After making corrections, the Originator may choose to submit another prenote file, but this is not required.

Prenotes can also be used to re-validate accounts that have been inactive or dormant before resuming ACH activity. This helps ensure that accounts are still open and able to accept ACH Entries.

Prenote Transaction Codes

The prenotification transaction codes differ from other Entry codes. The following chart lists prenote transaction codes by account and transaction type, along with the corresponding Return/NOC codes. Refer to the Nacha Operating Rules and Guidelines for complete details.

Account and Transaction Type	Prenotification Code	Return/NOC Code
Checking Account Credit	23	21
Checking Account Debit	28	26
Savings Account Credit	33	31
Savings Account Debit	38	36
General Ledger Credit	43	41
General Ledger Debit	48	46
Loan Account Credit	53	51

ACH REVERSALS/DELETIONS

ACH Originators may need to reverse transactions if a duplicate file was processed, or a transaction was sent in error (e.g., wrong account or amount). Reversals can be processed at the file, batch, or transaction level. The word “REVERSAL” must be in the Company Entry Description Field of the Batch Header Record.

Important Notes:

- A reversal does not guarantee that funds will be returned to the Originator. Credit Originators should take extra care to avoid sending transactions to unintended Receivers.
- A reversal must be initiated within five banking days *after* the settlement date. Nacha Rules require that the Originator notify the Receiver of the reversal and provide the reason for the reversing Entry.
- If your company uses the Direct Send/Transmission method for submitting ACH files, refer to the Nacha Operating Rules and Guidelines - ACH Record Format Specifications for details on reversal file components.

ACH FILE LIMITS

An ACH exposure limit may be established for your company based on expected transaction volume and creditworthiness. If you submit a file that exceeds this limit, the file may be suspended, deleted, or require special approval prior to processing, which could delay the processing of your transactions. If special circumstances require you to exceed the established limit, contact your Relationship Manager before submitting the file.

ACH PREFUNDING

Your service agreement may require ACH Prefunding, which ensures sufficient funds are available for requested credit payments. As a general rule, we will debit the offset account for the full amount two banking days prior to processing the transactions. Batches without sufficient funds will be suspended until adequate funds are available in the funding account. If collected funds are not available before processing begins on the evening prior to the settlement date of the batch, the batch may not be processed. Prefunding applies only to credit transactions.

SAME DAY ACH

Nacha's Same Day ACH Rule allows you to send same day ACH transactions to accounts at any RDFI. All RDFIs are required to receive and post same day ACH transactions. As of March 19, 2021, the ACH Network added an additional same day processing window to accommodate later delivery of originated same day transactions. This means that if your files are approved and delivered to the bank prior to 1:00 p.m. MT, the Effective Entry Date is current day (or stale-dated), AND the transactions meet the eligibility criteria below, they will be processed same day.

Same Day Eligibility

Eligible items:

- All domestic ACH transactions up to \$1,000,000 (PPD, CCD, etc.). Please note that some less common SEC codes have lower limits as defined by Nacha.
- Includes prenotes, Notifications of Change (NOC), and zero-dollar remittance.

Ineligible items

- International ACH Transaction (IAT) Entries
- Entries over \$1,000,000

ACH transactions submitted to the bank by the posted cutoff time, meeting eligibility requirements and having a same day Effective Entry Date will be processed as a Same Day Entry. Same Day Entry fees apply.

Important Note: ACH transactions submitted with stale or invalid Effective Entry Dates will be settled at the earliest opportunity, which could be the same day. Review all effective dates prior to submitting an ACH file.

SUBMITTING A REVERSAL/DELETION REQUEST

Please contact TM Client Services for assistance in processing these requests.

Bank	Phone	Email
Amegy Bank	888-539-7928	tmclientservices@amegybank.com
California Bank & Trust	888-316-6500	tmclientservices@calbt.com
National Bank of Arizona	888-241-5550	tmclientservices@nbarizona.com

Nevada State Bank	800-693-7695	tmclientservices@nsbank.com
Vectra Bank Colorado	800-341-8156	tmclientservices@vectrabank.com
Zions Bank	800-726-7503	tmclientservices@zionsbank.com

For same-day processing, reversal or deletion requests must be received by our same-day cutoff time and within five banking days of the original settlement date.

- Your company may submit reversal requests in writing using the Deletion/Reversal form.
- Treasury Internet Banking ACH users may also submit reversal requests in the system.

NOTIFICATIONS OF CHANGE (NOC)

A Notification of Change is a non-monetary transaction used by an RDFI to notify an ODFI (Originating Depository Financial Institution) that information in an Entry or prenotification is outdated or incorrect.

- The RDFI must transmit the NOC to the ODFI within two banking days of the original settlement date.
- The Originator must make the specified changes within six banking days of receiving the NOC information, or before initiating another Entry to the Receiver's account, whichever is later.
- Originators generally support uniform treatment of NOCs for one-time Entries, regardless of SEC Code.

Important Note: Non-compliance may result in Nacha Rules violations and associated fines.

Common NOC reasons are listed below. A full listing can be found in the Nacha Operating Rules – Notification of Change.

Code	Description
C01	Incorrect DFI Account Number
C02	Incorrect Routing Number
C03	Incorrect Routing Number and Incorrect Account Number
C13	Addenda Format Error

RETURN ENTRIES

A return Entry occurs when the RDFI or Receiver rejects a transaction your company has originated. Most returns are received within two banking days of the transaction's original settlement date and create a reversing Entry to Originator's settlement account.

- **Consumers:** May dispute unauthorized Entries up to 60 calendar days from their statement date.
- **Non-consumers:** The RDFI must return unauthorized non-consumer Entries (e.g., CCD and CTX) no later than the opening of the next business day following the settlement date.

Important Note: Unauthorized return timelines vary between consumer and non-consumer Entries.

Common return reasons are listed below. A full listing can be found in the Nacha Operating Rules – Return Entries.

Code	Description
R01	Insufficient Funds
R02	Account Closed
R03	No Account/Unable to Locate Account
R04	Invalid Account Number
R06	Returned Per ODFI Request
R07	Authorization Revoked by Customer
R08	Payment Stopped
R09	Uncollected Funds
R10	Customer Advises Originator is Not Known to Receiver and/or is Not Authorized by the Receiver to Debit Receiver's Account
R11	Customer Advises Entry Not in Accordance with the Terms of Authorization
R29	Corporate Customer Advises Not Authorized

ACH RETURNS REPORTING

Certain Rules apply to reinitiating returned ACH transactions. To review these Rules, refer to the Nacha Operating Rules and Guidelines. Nacha enforces strict compliance to maintain the integrity of the ACH Network, including termination of services and substantial fines for violations related to returns.

ACH RETURNS REPORTING

You can choose from the following options to receive information about returned transactions.

- Online: Via Treasury Internet Banking
- Data Transmission: Formatted in the standard Nacha file format or .CSV

ADDENDA REPORTING

Electronic Data Interchange (EDI) reporting gathers addenda information from ACH Entries and formats it into either a human-readable report or a data file.

- If the Receiver requests addenda information, your company must first include the information in an addenda record.
- The Receiver must obtain EDI reporting from their financial institution.
- Origination services are not required to enroll in EDI (addenda) reporting.

If your company has a trading partner that wishes to send you EDI information through ACH, please contact TM Client Services to discuss receiving EDI reports.

Bank	Phone	Email
Amegy Bank	888-539-7928	tmclientservices@amegybank.com
California Bank & Trust	888-316-6500	tmclientservices@calbt.com
National Bank of Arizona	888-241-5550	tmclientservices@nbarizona.com
Nevada State Bank	800-693-7695	tmclientservices@nsbank.com
Vectra Bank Colorado	800-341-8156	tmclientservices@vectrabank.com
Zions Bank	800-726-7503	tmclientservices@zionsbank.com

DEADLINES AND CUTOFF TIMES

Transactions must be submitted by the posted cutoff time to be processed the same day. Transactions submitted after the cutoff time will be processed on the next banking day.

Nacha recommends sending standard ACH files two banking days prior to the effective date. This allows time for review and correction if needed. Files with a next-day effective date may not provide enough time to resolve errors or processing issues.

Reversal or Deletion Requests must be submitted by the cutoff time listed below and must be initiated within five banking days of the original Settlement Date.

	Standard ACH Files Cutoff Time (Submit 1-2 Banking Days before Effective Date)		Same Day ACH Files Cutoff Time (Submit Same Day as the Effective Date)	
	Treasury Internet Banking	Direct Send (SFTP)	Treasury Internet Banking	Direct Send (SFTP)
Amegy Bank	8:00 p.m. CT	9:00 p.m. CT	2:00 p.m. CT	2:30 p.m. CT
California Bank & Trust	6:00 p.m. PT	7:00 p.m. PT	12:00 p.m. PT	12:30 p.m. PT
National Bank of Arizona (During Standard Time)	7:00 p.m. MT	8:00 p.m. MT	1:00 p.m. MT	1:30 p.m. MT
National Bank of Arizona (During Daylight Savings Time)	6:00 p.m. PT	7:00 p.m. PT	12:00 p.m. PT	12:30 p.m. PT
Nevada State Bank	6:00 p.m. PT	7:00 p.m. PT	12:00 p.m. PT	12:30 p.m. PT

Vectra Bank Colorado	7:00 p.m. MT	8:00 p.m. MT	1:00 p.m. MT	1:30 p.m. MT
Zions Bank	7:00 p.m. MT	8:00 p.m. MT	1:00 p.m. MT	1:30 p.m. MT

HOLIDAY AND WEEKEND PROCESSING

“Banking days” are days when the U.S. banking system is open for business. ACH file transfers and other online funds transfers will not be processed on days the Bank is closed. To avoid delays, clients should ensure that effective dates do not fall on non-banking days. We observe all Federal holidays listed below.

Federal Holidays

- New Year’s Day
- Martin Luther King, Jr. Day
- Presidents Day
- Memorial Day
- Juneteenth National Independence Day
- Independence Day
- Labor Day
- Columbus Day
- Veterans’ Day
- Thanksgiving Day
- Christmas Day

STANDARD ENTRY CLASS (SEC) CODES

Each ACH transaction must include a three-character identifier referred to as a Standard Entry Class (SEC) code. The SEC code identifies how the Entry was authorized and determines the Rules and formatting requirements that apply to the Entry.

Some SEC codes may only be used for transactions sent to a consumer account; others may only be used for transactions sent to a business/corporate account. Certain codes may be used for both consumer and business accounts.

Important Note: SEC codes must be used correctly and in accordance with the Nacha Rules. Certain SEC codes require an additional written agreement with the Bank before origination. These include ARC, BOC, IAT, POP, POS, RCK, TEL, and WEB.

Common SEC Codes

SEC Code	Receiver Acct. Consumer / Corporate	Definition	Debit / Credit	Return Timeframe*
ARC – Accounts Receivable Entry	Both	A single-Entry debit originated based on an eligible source document provided to an Originator via the US mail or at a drop box location.	Debit	Administrative: two banking days Unauthorized: 60 calendar days
BOC – Back Office Conversion Entry	Both	A single-Entry debit originated based on an eligible source document provided to an Originator at the point-of-purchase or manned bill payment location for subsequent conversion to an ACH transaction during back-office processing.	Debit	Administrative: two banking days Unauthorized: 60 calendar days
CCD – Corporate Credit or Debit Entry	Corporate	An Entry originated by an organization to or from the account of that organization or another organization. The Entry can be monetary or non-monetary.	Debit or Credit	Administrative: two banking days Unauthorized: 2 calendar days
CIE – Customer Initiated Entry	Consumer	A credit Entry initiated by or on behalf of the holder of a consumer account to the account of a Receiver.	Credit	Administrative: two banking days Unauthorized: 60 calendar days
COR – Notification of Change	Both	A non-monetary transaction that instructs the Originator of a transaction to change certain information before reinitiating another transaction to the same Receiver (i.e., change the account number, change the transaction code, etc.).	N/A	N/A
CTX – Corporate Trade Exchange Entry	Corporate	An Entry originated by an organization to or from the account of that organization or another organization. This transaction may be accompanied by up to 9,999 lines of payment-related addenda information. CTX is most commonly used when multiple lines of addenda are needed.	Debit or Credit	Administrative: two banking days Unauthorized: 2 calendar days
IAT – International ACH Transaction**	Both	A debit or credit Entry that is part of a payment transaction involving a financial agency’s office that is not located in the territorial jurisdiction of the United States.	Debit or Credit	Administrative: two banking days Unauthorized: 60 calendar days
POP – Point of Purchase Entry	Both	A single-Entry debit originated based on an eligible source document provided in-person to an Originator at the point-of-purchase or manned bill payment	Debit	Administrative: two banking days

SEC Code	Receiver Acct. Consumer / Corporate	Definition	Debit / Credit	Return Timeframe*
		location for conversion to an ACH transaction at the point-of-purchase or manned bill payment location.		Unauthorized: 60 calendar days
PPD – Prearranged Payment and Deposit Entry	Consumer	An Entry originated by an organization to a consumer account based on a standing or single-Entry authorization from the Receiver of the transaction. Payroll-related credit Entries must use “PAYROLL” as the Company Entry Description.	Debit or Credit	Administrative: two banking days Unauthorized: 60 calendar days
RCK – Re-presented Check Entry	Both	A debit Entry used to collect the amount of a check returned for insufficient or uncollected funds.	Debit	Administrative: two banking days Unauthorized: 60 calendar days
TEL – Telephone Initiated Entry	Consumer	A debit Entry originated based on an oral authorization provided to the Originator by a Receiver via the telephone.	Debit	Administrative: two banking days Unauthorized: 60 calendar days
WEB – Internet/Mobile Initiated Entry***	Consumer	A debit Entry originated based on (1) an authorization that is communicated, other than by an oral communication, from the Receiver to the Originator via the internet or a wireless network; or (2) any form of authorization if the Receiver’s instruction for the initiation of the individual debit Entry is designed by the Originator to be communicated, other than by an oral communication, to the Originator via a wireless network. E-commerce-related debit Entries must use “PURCHASE” as the Company Entry Description.	Debit	Administrative: two banking days Unauthorized: 60 calendar days
XCK – Destroyed Check Entry	Both	A debit Entry initiated to collect an eligible item that is contained within a cash letter that has been lost, destroyed, or is otherwise unavailable to the originating bank.	Debit	Administrative: two banking days Unauthorized: 60 calendar days

*Return timeframes listed in this table may vary depending on certain circumstances surrounding the transaction. For a complete guide on return timeframes, please refer to the *Nacha Operating Rules and Guidelines*, and *Regulation E for Consumer rights for returns*.

**International ACH Transactions (IAT) must be kept separate from domestic transactions. IAT Transactions are limited to credit Entry payments to Mexico and Canada. The processing requirements and schedules for these transactions differ from normal domestic transactions. The Bank prohibits you from making IAT transfers from any consumer account or otherwise

on behalf of any consumer. Please contact your Treasury Management representative or Relationship Manager for more information.

**** All **consumer-to-consumer** credits must be originated using the WEB SEC Code, “regardless of whether the authorization is communicated via the internet or wireless network.” That is, no matter what the consumer Originator’s communication channel is for the payment instruction, the Entry must be coded as a WEB credit.*

ADDITIONAL RESOURCES

- Discover helpful information about ACH processing as well as the Nacha Rules at www.nacha.org.
- Purchase a copy of the Nacha Rules, which entitles you to access the Rules online at www.achRulesonline.org. The search features of the online edition can be helpful, especially to those who are unfamiliar with the Rules.
- Access additional resources at Western Payments Alliance <http://www.wespay.org>.

The materials available in this guide are for general informational purposes only and not for the purpose of providing specific instruction or legal advice. You are solely responsible for compliance with, and interpretation of, all Nacha Rules, and should contact your attorney to obtain advice with respect to any particular issue or problem. You are also reminded that you are solely responsible for compliance with any agreements with the Bank, including but not limited to, the Treasury Management Master Services Agreement.