

FIRST BANK RICHMOND, NA

WIRE PROCEDURES

OUTGOING WIRE REQUESTS:

Outgoing wires requested must adhere to the following procedures effective December 4, 2007:

Fees:	Domestic wires:	\$20.00
	International wires:	\$40.00
Cut-off Time:		3:00 EST

Verification: All wire transfer requests must fall under one of the following.

Phone/E-mail/Mail: Will only be honored if the existing customer has signed up for our Telephone Transfer Program. Pre-authorized cards will be on file and a security code will be established. Note the date and time the request was made and method of identifying the customer. (i.e.: "security code verified", do not write actual code on the Outgoing Wire Transfer Agreement)

In Person: The existing customer is to sign and date the Outgoing Wire Transfer Agreement in order to authorize the withdrawal for wire purposes.

Fax: A facsimile request for wires will be honored only by established customers when a follow-up phone call can be made as verification or if the existing customer has signed up for our Telephone Transfer Program.

- Funds received must be collected funds, such as; cash, an OnUs check, or from the customer's existing account.
- Inform the customer that the outgoing wire fee will be deducted from the balance remaining in the account after the wire has been processed.
- Obtain necessary information from the customer including; name, account to be wired from, wire instructions from receiving bank.
- Process the wire by using the proper tran. code on the account. Deposit service analysis charges the account per the tran. codes at the end of each month.

- All outgoing wire requests should be scrutinized for any non-conforming or unusual pattern that would not fit the normal business habit of the customer or activity of the business. Unusual business could be, but not limited to larger than normal transfer amounts, transfers by new or unfamiliar customers, international wires, repeat wire transfers for the same or similar amounts, or any other unusual activity not conforming to the normal pattern of business associated with the conduct of the account. Any First Bank employee receiving a request to wire funds is to question unusual activity and bring it to the attention of their supervisor prior to release of the funds to be wired.

The employee/recipient is responsible for verifying the validity of any received wire request by (1) placing a follow-up phone call using a phone number either on file by First Bank or recorded by phone directory, or (2) acknowledgement of the customer's identity by business activity and/or account relationship.

After verifying information that will positively identify the wire customer, the identifying information is to be placed on the OUTGOING WIRE TRANSFER AGREEMENT and then signed by the employee/recipient. Upon identification and signing, the wire request can be forwarded to the Wire Transfer Department for wiring transfer.

It is important to note that lack of verifying information and/or verifying signature by employee/recipient on the OUTGOING WIRE TRANSFER AGREEMENT may cause a delay in the processing or the wire transfer.

- All Outgoing Wire Transfer requests will comply with First Bank Richmond's Foreign Assets Control Policy. Before executing the Outgoing Wire Transfer, check the Office of Foreign Assets Control (OFAC) list of Specially Designated Nationals and Blocked Entities. The OFAC list is supplied by Lyon's software or in written form from the Compliance Department. If the customer matches a listing on the OFAC list, complete the Outgoing Wire Transfer agreement as usual and notify the Compliance Department immediately after the customer leaves for further instructions. The wire is not processed until approval is obtained from the Compliance Department. Do not forward the wire information to Electronics.
- Non-Established Customer wires are unacceptable.
- Tax Payment wires must adhere to the attached procedure due to the need for timeliness of payment to the IRS.

INCOMING WIRE REQUESTS:

Incoming wires to established customer accounts must adhere to the following procedures.

Incoming wires to non-established customers are to be wired back to the originator.

Fees: Domestic wires: \$15.00

International wires: \$25.00

Cut-off Time: 4:45 EST

Instructions: Existing customer incoming wire requests:

Wire to: First Bank Richmond, NA

ABA (Routing) #: 274970791

Credit: Customer Name

Account #: Customer Account #

- Process the wire by using the proper tran. code on the account. Deposit service analysis charges the account per the tran. codes at the end of each month.
- First Bank Richmond will post the funds to the proper customer account using the proper tran. code.