

NATIONAL IRON BANK FUNDS AVAILABILITY POLICY

The purpose of this policy is to describe National Iron bank's check hold policy for transaction accounts. The bank's objective is to make funds available as expeditiously as good business practices mandate.

The length of delay is counted in business days from the business day of deposit. Every day is a business day except Saturdays, Sundays, and federal holidays. If a deposit is made at a staffed teller station during any working business day on a day the bank is open, the bank will consider that day to be the day of deposit. If a deposit is made after the closing or on a day the bank is closed, the bank will consider the next business day the bank is open to be the day of deposit.

Any adverse changes in our Funds Availability Policy will be communicated to all customers no less than 30 days prior to the change.

Same-Day Availability

Funds from the following deposits are available on the business day of deposit:

- All electronic payments, such as direct deposits

Next-Day Availability

Funds from government checks (local and state) are available the next day as long as the check is made payable to the account holder. If the check is not made payable to the account holder, then a two-day waiting period will apply.

If the deposit is made in person to one of the bank's tellers, funds from the following items are also available on the first business day after the day of deposit:

- Wire transfers
- Checks drawn on the bank, if funds are available in the account
- Cash deposits
- U.S. Treasury checks made payable to the account holder
- Cashier's, certified, and teller's checks that are payable to you [upon request only].
- Federal Reserve Bank checks, Federal Home Loan Bank checks if these items are payable to the depositor

If the deposit is not made in person to one of the bank's tellers (for example, if the deposit is made through the mail or at a night depository), funds from these deposits will be available on the second business day after the day of deposit.

Other Checks

The delay for other check deposits is local. The bank will make the first \$200 from a deposit of local checks available on the first business day after the day of the deposit. The remaining funds from a local check will be available on the second business day after the day of the deposit.

Longer Delays

Availability may be delayed for longer periods under the following circumstances:

- The bank believes a check will not be paid.
- Deposited checks total more than \$5,000 on one day.
- Returned unpaid checks are redeposited.
- An account has been overdrawn six times or more in the last six months.
- Emergencies, such as failure of communications or computer equipment.

The bank will notify affected customers if the bank delays their ability to withdraw funds for any of these reasons. The bank will tell affected customers when the funds will be available, which generally will be no later than the seventh business day after the day of deposit. Affected customers will be required to sign the notice of hold form.

New Account Rules

Special rules apply during the first 30 days after an account is opened. An account is not new if the customer has had another transaction account at the bank for more than 30 days. If the customer has had authorization only to sign on a corporate account and then opens a new consumer account, it is considered a new account for purposes of Regulation CC. Funds from electronic direct deposits and cash will be available on the day of deposit.

Funds from wire transfer deposits and the first \$5,000 of a day's total deposit of federal, state, and local government checks will be available on the first business day after the day of deposit if checks are payable to the depositor. The excess over \$5,000 will be available on the fifth business day after the day of deposit. If the deposit of these checks (other than a U.S. Treasury check) is not made in person to one of the bank's employees, the first \$5,000 will not be available until the second business day after the day of deposit. Funds from local checks will be available on the 2nd business day after the day of deposit.

Holds on Other Funds

If the bank cashes a check or accepts for deposit a check drawn on another depository, the bank may make funds immediately available but delay the availability to withdraw a corresponding amount of funds on deposit in any account the depositor has with the bank. Held funds will be available according to the bank's check hold policy stated elsewhere in this Regulation CC policy.

Deposits at Automated Teller Machines

Funds from any deposits (cash or check) made at automated teller machines (ATMs) we own or operate will be available on the second business day after the day of deposit, except the U.S. Treasury checks that are payable to you will be available on the first business day after the day of deposit. Also, the first \$200.00 of a deposit will be available on the first business day after the day of deposit. Checks drawn on National Iron Bank will be available on the first business day after the day of deposit if the deposit is made at an ATM located on our premises

When the Bank Will Pay Interest on Deposits

The bank will begin to accrue interest on deposits to interest-bearing accounts on the 2nd day after the bank receives the deposit. Deposits are considered deposited on the same day when received at a teller station or proprietary ATM. They are considered deposited when they are removed from night depositories, lock boxes, and nonproprietary ATMs. When deposits are sent through the mail, they are considered deposited when received by the bank.

All bank employees with duties that involve the requirements of Regulation CC will be trained by the compliance officer and will have written procedures in their departments regarding the provisions that relate to their job duties.

Reviewed and Approved by the Board of Directors October 27, 2016.