

ELECTRONIC FUNDS TRANSFER SECURITY PROCEDURES

Effective Date: March 30, 2022

This document sets forth the Security Procedures effective on and after the Effective Date set forth above agreed upon by Credit Union and Corporate America Credit Union (“CACU”) in accordance with the Master Services Agreement and Electronic Funds Transfer Services Exhibit to the Master Services Agreement between Credit Union and CACU with respect to all Funds Transfers, Payment Orders, International Funds Transfers, International Wires and Remittance Transfers (collectively “Funds Transfers” for the limited purposes of these Security Procedures) and any amendments or cancellations thereto. This document supersedes and replaces any and all previous Security Procedures for electronic funds transfer under the Master Services Agreement and Electronic Funds Transfer Services Exhibit to the Master Services Agreement between Credit Union and CACU. These Security Procedures are hereby incorporated by reference into the Master Services Agreement and Electronic Funds Transfer Services Exhibit to the Master Services Agreement between Credit Union and CACU.

Authorized Users

Credit Union shall ensure that only individuals who have been authorized by Credit Union have access to perform Funds Transfers either via CACU’s Wire Platform or by phone. Credit Union Authorized Officers or End User Authorization Contacts shall submit requests to CACU to add wire transfer authority, by phone and/or through CACU’s Wire platform, only for those individuals who are authorized by Credit Union to initiate and transmit Entries to CACU on Credit Union’s behalf (“**End User**”). These requests can be submitted by scanning a signed End User Authorization Form and emailing to contracts@corpam.org or by submitting an Electronic End User Authorization Form through the “Community” link in CACU’s Single Sign-On Platform (“SSO”).

Credit Union shall be solely responsible for controlling and monitoring the use of the User ID, SSO Password, One-Time Passcode, Security Question Answers, and/or Phone Wire Passcodes (“**Access Requirements**”) and maintaining the confidentiality of such data. Credit Union shall instruct all End Users to treat the Access Requirements with extreme care. Credit Union shall notify CACU immediately of any unauthorized disclosure or use of the Access Requirements, including without limitation, if an End User is no longer employed by Credit Union, by telephone at (800) 292-6242 with a confirmation followed in writing within 24 hours.

Dual Approval

All Funds Transfer requests, regardless of method of request, require dual approval by Credit Union Authorized End Users. End Users can be granted authority for entry of wires, approval of wires, or both.

Entry Authority & Limit

End Users can be granted authority for entry of online domestic wire transfers, online international wire transfers, and/or phone domestic wire transfers. Each End User who is granted any such authority will also be required to have a dollar limit for the associated authority. Any wire transfer entered by an End User must be approved by a separate End User with appropriate approval authority at Credit Union.

Approval Authority & Limit

End User(s) can be granted authority for approval of online domestic wire transfers, online international wire transfers, and/or phone domestic wire transfers which have been entered by another Credit Union End User. Each End User who is granted such authority will also be required to have a dollar limit for such verification authority. An End User cannot approve any Funds Transfer he or she has entered.

Online Wires

Funds Transfer requests can be submitted online through CACU's Wire Platform housed behind their SSO. End User access to SSO is granted through the use Multi-Factor Authentication ("MFA") requiring an End User to enter a User ID, Password, One-Time Passcode, and Security Question Answer. Further details of these items are listed below.

User ID

The End User's email address will serve as their User ID to access CACU's SSO and underlying Wire Platform. Credit Union will ensure that the email address associated with each End User is an individual email address accessible only by that individual End User. Group email addresses are not permitted to be utilized. Additionally, Credit Union will ensure that no End User is set up for access to any CACU system with multiple User IDs; only one user ID is permissible per End User. After an End User request has been submitted by an Authorized Officer at Credit Union, CACU will setup the User ID in SSO along with appropriate access to the Wire Platform, including authorities for entry and/or approval as well as dollar limits associated with each authority.

Password

Upon End User setup, CACU will send a temporary password to the End User via secure email to the email address associated with the User ID. This temporary password is valid for 24 hours. The End User will be required to set a unique password with minimum requirements of one numeric character, one upper and lowercase letter, one special character, a minimum of eight characters total upon initial login. Each End User will be prompted to change his or her password after it has been in use for 90 days. The system will lock the End User from access after three incorrect password attempts.

One-Time Passcode

Each time an End User attempts to login to SSO, he or she will be required to enter their User ID and Password. Following successful authentication of User ID and Password, the system will email a One-Time Passcode to the email address associated with the User ID. This email will come from notifications@corpam.org. The passcode is good for only one-time use and will be valid for five minutes. The system will lock the End User from access after three invalid One-Time Passcode attempts.

Security Questions

Upon initial login, each End User will be required to choose five Security Questions and enter answers to these questions into the SSO system to provide an additional validation method. After an End User has properly entered User ID, Password, and One-Time Passcode, he or she will be required to enter the answer to one of these Security Questions to access the SSO system. The SSO system will lock the user from access after three invalid Security Question attempts.

Password Resets/Unlocking an End User

In order to request a password reset or to unlock an End User, the End User must contact CACU's Member Services department at (800) 292-6242 or IT department at ext. 222 to request. CACU will place a telephone call to the End User at the telephone number designated by the Credit Union for such person in the End User Authorization Form to verify the request prior to password reset or unlocking the End User. In the case of a password reset, CACU will send a temporary password to the End User via secure email to the email address associated with the User ID after verifying the request. This temporary password is valid for 24 hours.

Phone Wires

Funds Transfer requests can be submitted by calling CACU's Member Services Department at (800) 292-6242. Phone Wire Passcodes are required for any Funds Transfer requests, including entry or approval, submitted by phone. Further details are listed below:

Phone Wire Passcodes

Upon End User setup, CACU will send a Phone Wire Passcode to the End User via secure email to the email address associated with the End User on the End User Authorization Form.

Phone Wire Entry

The End User shall represent herself or himself as an Authorized End User by supplying the Credit Union name, their name, and advising they wish to submit a wire transfer request to CACU's Member Services Department.

CACU will:

1. Obtain the Phone Wire Passcode assigned to that End User from the person purporting to be the End User and then confirm the Funds Transfer order by obtaining from that person data regarding the amount of the transfer, the beneficiary and the beneficiary's account
2. Record the interaction on the phone
3. Any other measures as we may deem appropriate or necessary

Phone Wire Verification

A second separate CACU Member Service Representative will call a second separate End User with appropriate authorities to verify any Funds Transfer requests.

CACU will:

1. Place a telephone call to the second separate End User at the telephone number designated by the Credit Union for such person in the End User Authorization Form
2. Request to speak to the End User
3. Obtain the Phone Wire Passcode assigned to that End User from the person purporting to be the End User and then confirm the Funds Transfer order by obtaining from that person data regarding the amount of the transfer, the beneficiary and the beneficiary's account
4. Record the interaction on the phone
5. Any other measures as we may deem appropriate or necessary

Compliance with Security Procedures

Credit Union understand and agrees that any failure of Credit Union or any of Credit Union's End Users, officers, employees or agents to exactly and fully comply with the Security Procedures shall constitute Credit Union's material breach of the Master Services Agreement and the Electronic Funds Transfer Services Exhibit to Master Services Agreement.

Credit Union understands and agrees if CACU materially complies with the Security Procedures as applicable to any Funds Transfer, such Funds Transfer shall be deemed authorized by and effective as to and against Credit Union for any and all purposes. Credit Union shall have no right to claim against CACU and CACU shall have no liability for any Funds Transfer for which CACU materially complies with the Security Procedures applicable to such Funds Transfer even if such Funds Transfer was in fact unauthorized or fraudulent.