



2019 Annual ACH Rules Compliance Audit

December 4, 2019

Purpose

This document attests that Internal Audit performed the 2019 NACHA Operating Rules compliance audit for Bankers' Bank.

Objectives

Bankers' Bank is a third-party service provider supporting both Originating Depository Financial Institutions (ODFIs) and Receiving Depository Financial Institutions (RDFIs). According to the NACHA Operating Rules, third-party service providers that perform a function of ACH processing on behalf of an ODFI or RDFI must conduct an annual audit of compliance with the requirements of the NACHA Operating Rules.

Internal Audit performed a review of ACH rules compliance for the Bank's ACH function. The review procedures performed were based on the key rule provisions that should be examined by third-party service providers acting on behalf of ODFIs and RDFIs according to the NACHA 2019 Operating Guidelines.

Conclusion

It is Internal Audit's opinion that the Bank's ACH rules compliance is satisfactory.

A handwritten signature in dark ink, reading 'Thomas F. Dawe', is written over a horizontal line.

Thomas F. Dawe, Senior Vice President - Audit