

FIRST NATIONAL BANK Fund Transfer Limits Policy *Internal Reference - Effective Date:*
January 2024

Section 1: Overview of Transfer Limits

Transfer limits are established to protect customers from fraud, comply with regulatory requirements, and manage operational risk. These limits apply to various transfer methods and may vary based on account type, customer relationship, and risk assessment.

Section 2: Daily Transfer Limits by Channel

Online Banking Transfers:

- Standard Checking: \$2,500 per day
- Premium Checking: \$5,000 per day
- Business Checking: \$10,000 per day
- Commercial Accounts: \$25,000 per day (with dual authorization)

Mobile Banking Transfers:

- Personal Accounts: \$1,000 per day
- Business Accounts: \$2,500 per day
- P2P Transfers (Zelle): \$500 per transaction, \$2,500 per day

ATM Transfers:

- Between own accounts: \$1,000 per day
- Cash withdrawals: \$500 per day (standard), \$1,000 per day (premium)

Wire Transfers:

- Domestic wires: No daily limit (subject to available funds and verification)
- International wires: \$50,000 per day (requires enhanced verification above \$10,000)

Section 3: Monthly and Transaction Limits

ACH Transfers:

- Outgoing ACH: \$10,000 per transaction, \$25,000 per month
- Incoming ACH: No limits (subject to fraud monitoring)

Bill Pay Services:

- Standard accounts: \$5,000 per payee per day
- Premium accounts: \$10,000 per payee per day

- Express bill pay: Same-day processing available for additional fee

Section 4: Regulatory Compliance

Regulation D Limitations:

- Savings and money market accounts: 6 withdrawals per month
- Exceeding limits may result in account conversion or closure
- Electronic transfers count toward monthly limit

Bank Secrecy Act (BSA) Requirements:

- Transactions over \$10,000 require Currency Transaction Report (CTR)
- Suspicious patterns trigger enhanced monitoring
- Customer notification required for reporting thresholds

Section 5: Limit Override Procedures

Temporary Limit Increases:

- Customer request required with business justification
- Manager approval for increases up to 200% of standard limit
- Senior management approval for larger increases
- Documentation required for all overrides

Permanent Limit Adjustments:

- Based on account history and relationship depth
- Credit assessment for significant increases
- Annual review of all custom limits

Section 6: Fraud Prevention Measures

Monitoring Triggers:

- Transactions exceeding 150% of typical patterns
- Multiple large transactions in short timeframe
- Transfers to new or high-risk destinations
- Cross-border transfers above \$5,000

Customer Verification Requirements:

- Phone verification for large or unusual transactions

- Multi-factor authentication for online transfers above \$1,000
- In-person verification for wire transfers above \$25,000

Section 7: Customer Communication

Limit Notifications:

- Daily limit reached: Immediate notification via preferred channel
- Approaching monthly limits: 48-hour advance warning
- Failed transactions: Real-time alerts with reason codes

Override Request Process:

- Customer service can process requests during business hours
- Emergency override procedures available 24/7
- All requests logged and reviewed monthly