

ADVERTISING AND MARKETING APPROVAL POLICY

GENERAL POLICY

It is the Bank's policy that all forms of marketing and advertising be approved by the compliance department and senior management prior to use.

REQUESTS FOR APPROVAL OF ADVERTISING

Officers may request approval of advertising and marketing by submitting a copy the item (if applicable) together with a completed *Advertising Approval Request Form*. One copy of the request form should be submitted to senior management and one copy to the compliance department. The *Advertising Approval Request Form* should include a complete description of the advertisement or promotion and how or where it will be used.

The officer submitting a request is responsible for obtaining the necessary approvals from compliance and senior management on the *Advertising Approval Request Form* before proceeding with an advertisement, promotion or marketing effort.

REGULATORY REQUIREMENTS/RESTRICTIONS

Certain regulatory disclosures are required for almost all bank advertising. Some forms of advertising and marketing, such as lotteries are legally restricted. Proper approval must be obtained from the compliance department and senior management before running any promotion. The compliance department will ensure that all regulatory and disclosure requirements have been met and will maintain copies of all advertising for review by examiners. Senior management will approve content and cost.

Marketing efforts will be reviewed to ensure that target markets are not selected using a prohibited basis: race, color, religion, national origin, sex, marital status, age, handicap, familial status, receipt of public assistance income, or because an applicant has in good faith exercised any rights under the Consumer Credit Protection Act. In addition, Advertising to all of the Bank's assessment area will be included in the overall plan (as applicable to the products being marketed).

COMMON MEDIUMS USED FOR ADVERTISING AND MARKETING

As defined by various regulations and laws many of the communications the Bank issues to the public and its' customers are forms of advertising.

The following are common mediums used for advertising and marketing:

1. Television and radio commercials;
2. Billboards; signs, and banners
3. Ads in magazines, newspapers, phonebooks, and directories;

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4. Direct mail marketing and form letters;
5. Flyers, handouts and pamphlets;
6. Clothing items, hats, buttons, pens;
7. Information on the Bank's website;
8. Lists of names used for marketing purposes;
9. Special offers to waive fees or specially structure accounts;
10. Lotteries, drawings, and contests;
11. Sponsoring fund raisers in exchange for free advertising;
12. Links to other companies' websites;
13. Allowing other companies to advertise their products or services on bank premises; and
14. Advertisements for products added to customer statements or receipts.

When in doubt as to whether a promotion is considered advertising officers are directed to contact the compliance department for assistance.

Question regarding this policy should be directed to the Vice President, Compliance Department.