

GUIDELINES REGARDING CONTACT WITH THE FDIC & FDIC EXAMINERS & EXAMINATIONS *

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In light of the fact that the last several FDIC examinations have been protracted and in some ways disruptive to the day-to-day business of the Bank, it is appropriate that the Bank establish guidelines and practices which will insure that the Federal Deposit Insurance Corporation is able to obtain all of the information that it needs to accomplish its objectives while not interfering with or causing unnecessary inconvenience to the day-to-day operations of the Bank. Accordingly, the BestBank Board of Directors on September 17, approved and adopted the following guidelines.

1. BestBank will comply fully with all FDIC inquiries and/or requests for information.
2. All communications between BestBank and the FDIC shall be formal, properly recorded and documented.
3. FDIC examiners will be provided with a designated area for their work, and except for rest room access, shall limit their presence to that designated area in order to provide for a smooth continuation of regular banking business by other Bank employees. FDIC examiners will be asked to avoid informal communications, contacts, or conversations with Bank employees during business hours.
4. All requests for documents and questions from examiners must be in writing, dated, signed, and directed to a single contact person who will be designated by the Bank's Chief Executive Officer.
5. Responses and contacts will be scheduled at fixed intervals, convenient to all parties.
6. Photocopies of all documents requested by the examiners will be prepared for them by a designated Bank employee, will be logged out to the examiner, and must be returned to the Bank in order to insure that the confidentiality of Bank records is protected. No copies of any documents may be removed from the Bank unless and until the Bank is provided with a written request for such removal specifically explaining the reason for such removal. The Bank recognizes the FDIC's need to have copies of certain documentation for their workpapers.
7. No scanning, photocopy, or fax equipment may be brought into the Bank.
8. In order to facilitate the convenient comings and goings of examiners, the Bank will allocate designated parking spaces, and examiners will be asked to log in and out of the Bank at all times..
9. The Bank will not provide equipment, supplies, or food service of any type to FDIC examiners.
10. No informal of "off the record" contact will be engaged in.
11. Examiners will be asked to reaffirm their obligations to keep Bank records and information confidential as mandated by Section 309.6 of the FDIC Rules and Regulations. This section precludes disclosure of Bank records and information to any person other than those officers, directors, employees or agents of the FDIC who have a need for such records or information in the performance of their official duties. Additionally, the examiners will be required to agree to make no contact with Bank customers, present or former Bank employees, suppliers, or anyone else outside of the Federal Deposit Insurance Corporation except by writing, with the Bank's prior written authorization.
12. Any exit conferences will be held with the CEO and/or his designee, with at least two Bank officials present at all times.

Adopted by BestBank
Board of Directors
September 1996

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