

The Guiding Principles were developed by EPCOR's Third-Party Sender Forum* to demonstrate our commitment to compliance and ethical business practices to financial institutions, customers and the collective payments industry.

We are dedicated to the concepts of effective and reliable financial networks, integrity and compliance with all laws and rules is essential to the achievement of this objective.

We recognize the chief function of a Third-Party Sender in the ACH Network is to satisfy the needs of the Originator and Originating Depository Financial Institution as well as the Receiver and the Receiving Depository Financial Institution while adhering to the ACH Rules, all applicable Federal and state laws and regulations.

We are dedicated to the maintaining high standards of professionalism and integrity in managing the flow of funds on behalf of our Originators.

We will continually improve the competence of our personnel by training them in the *ACH Rules* and other industry best practices to insure the integrity of the ACH network.

We will not knowingly provide services to others making misleading or deceptive representations or statements regarding services or products.

We will make no representations and take no actions inconsistent with the ACH Rules and any applicable laws or regulations or which may be inconsistent with these principles.

We will protect confidential and non-public information and only use that information as agreed to with the owner.

We will hold all funds in transit for Originators in trust and to fully account for these funds, recognizing that these funds are not the property of, or subject to use by, the Third-Party Sender.

We will share these Guiding Principles on to resellers and users of the Third-Party Sender's services.

We recognize that the Third-Party Sender holds a public trust and therefore may not leverage their access to nonpublic information, proprietary information or confidential information for personal gain except as disclosed and agreed to in advance by all parties.

*EPCOR's Third-Party Sender Forum is a working group of EPCOR Associate members dedicated to advancing the highest standards of excellence in compliance and sound business practices through peer collaboration.

The Third-Party Sender Forum is now the Third-Party Sender/ODFI Roundtable

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