



# Sterling federal Bank

5/6/2026

Thank you for choosing Sterling Federal Bank for your electronic banking needs.

As an ACH Originator, please be aware that the following federal holidays are non-processing days. ACH files will not be processed on these dates. If you need payments to settle on or around these holidays, you may need to submit your files earlier than usual.

The list of upcoming federal holidays that may impact your ACH schedule is as follows:

Date	Holiday	Origination Requirements
5/25/2026	Memorial Day	To post by 5/22/26, originate your file no later than 3:30 p.m. CST on 5/20/26
6/19/2026	Juneteenth National Independence Day	To post by 6/18/26, originate your file no later than 3:30 p.m. CST on 6/16/26
9/7/2026	Labor Day	To post by 9/4/26, originate your file no later than 3:30 p.m. CST on 9/2/26
10/12/2026	Columbus Day	To post by 10/9/26, originate your file no later than 3:30 p.m. CST on 10/7/26
11/11/2026	Veterans Day	To post by 11/10/26, originate your file no later than 3:30 p.m. CST on 11/6/26
11/26/2026	Thanksgiving Day	To post by 11/25/26, originate your file no later than 3:30 p.m. CST on 11/23/26
12/25/2026	Christmas Day	To post by 12/24/26, originate your file no later than 3:30 p.m. CST on 12/22/26
1/1/2027	New Year's Day	To post by 12/31/26, originate your file no later than 3:30 p.m. CST on 12/29/26
1/18/2027	Martin Luther King Jr. Day	To post by 1/15/27, originate your file no later than 3:30 p.m. CST on 1/13/27
2/15/2027	Presidents' Day	To post by 2/12/27, originate your file no later than 3:30 p.m. CST on 2/10/27

## Regulatory Notice Regarding Non-Consumer ACH Entries

In accordance with the National Automated Clearing House Association (NACHA) Operating Rules and applicable Federal regulations, Sterling Federal Bank provides the following required disclosures concerning non-consumer ACH entries:

- a) The entry may be transmitted through the Automated Clearing House (ACH) network.

- b) Your rights and obligations with respect to such entries are governed by, and construed in accordance with, the laws of the State of Illinois.
- c) Credit given by the receiving financial institution to the Receiver is provisional until the receiving institution has received final settlement through a Federal Reserve Bank or otherwise has received payment, as provided in Section 4A-403(a) of the Uniform Commercial Code.
- d) If the receiving institution does not receive final payment, it is entitled to a refund from the Receiver in the amount of the credit to the Receiver's account. In such an event, you will not be considered to have paid the amount of the credit entry to the Receiver.

Furthermore, electronic transactions processed through the ACH network are subject to applicable Federal laws, regulations, and the NACHA Operating Rules. These rules and regulations are periodically reviewed and revised, typically on an annual basis, to reflect changes within the industry.

By executing an ACH Origination Agreement with Sterling Federal Bank, your company acknowledges and agrees to comply with these governing laws and rules.

### **Annual NACHA Rules Update & Security Reminder**

Each year, the National Automated Clearing House Association (NACHA) publishes updates to the NACHA Operating Rules. A copy of the Rules may be purchased through NACHA at [www.nachaoperatingrulesonline.org](http://www.nachaoperatingrulesonline.org).

By continuing to originate ACH files, your organization acknowledges and agrees to comply with the NACHA Operating Rules, as amended from time to time.

Below is a summary of recent and upcoming rule changes relevant to corporate originators, including enhanced fraud monitoring and risk-management requirements effective in 2026.

We also encourage you to review cybersecurity best practices to help safeguard your accounts. Visit the [FCC Cybersecurity Small Biz Cyber Planner](#) for additional cybersecurity best practices and resources.

Please review the key changes and their effective dates below:

#### **Effective March 20, 2026**

##### **New Fraud Monitoring Requirements (Phase 1)**

ACH Originators, Third-Party Service Providers (TPSPs), and Third-Party Senders (TPSs) that originated more than 6 million ACH payments in 2023 are required to establish and implement risk-based processes and procedures reasonably intended to identify ACH entries initiated due to fraud. These procedures must be reviewed annually and updated periodically to address evolving fraud risks and threats.

##### **Standardized Company Entry Descriptions**

To improve the transparency and identification of ACH transactions, NACHA is implementing standardized Company Entry Descriptions for certain transaction types:

- **PAYROLL** must be used for PPD credit entries related to wages, salaries, payroll, or similar compensation payments.
- **PURCHASE** must be used for certain consumer e-commerce debit entries initiated using the WEB SEC Code, subject to limited NACHA exceptions.

### **Effective June 22, 2026**

These requirements ultimately apply to all ACH Originators, including smaller-volume originators.

### **Fraud Monitoring Requirements (Phase 2)**

All remaining ACH Originators, TPSPs, and TPSs, regardless of ACH origination volume, are required to implement risk-based fraud detection and prevention procedures consistent with NACHA Operating Rules requirements.

ACH Originators are responsible for establishing and maintaining risk-based processes and procedures designed to identify and help prevent fraudulent ACH activity. This includes periodically reviewing ACH activity for unusual or suspicious transactions, implementing appropriate internal controls and security measures, validating transaction information when warranted, and updating procedures as fraud risks evolve. Originators should also work closely with any third-party service providers involved in ACH processing to ensure compliance with applicable NACHA Operating Rules and fraud monitoring requirements.

If you have any questions or need assistance understanding how these changes may affect your operations, please don't hesitate to contact us [CommercialDeposits@sterlingfederal.com](mailto:CommercialDeposits@sterlingfederal.com).

Sincerely,  
Sterling Federal Bank  
Commercial Deposits Team