

Third-Party Sender Guiding Principles



The *Guiding Principles* were developed by EPCOR's Third-Party Sender Forum* as a means to demonstrate each company's commitment to compliance and ethical business practices to their financial institution partners, customers and the collective payments industry.

Tenet 1

Be dedicated to the concepts of effective and reliable financial networks and believe that processing with integrity and compliance with all laws and rules is essential to the achievement of this objective.

Tenet 2

Recognize that at all times the chief function of a Third-Party Sender in the ACH Network is to serve the needs of the Originator and Originating Depository Financial Institution as well as the Receiver and the Receiving Depository Financial Institution in accordance with the ACH Rules, all applicable laws and regulations and agreements.

Tenet 3

Be dedicated to the highest ideals of honor and integrity in managing and facilitating the flow of funds on behalf of an Originator.

Tenet 4

Make it a duty to continually improve the competence and training of personnel in the rules and "best practices" to insure the integrity of the ACH and banking network.

Tenet 5

To neither make nor knowingly provide services to others making misleading or deceptive representations or statements regarding services or products.

Tenet 6

To make no representations or promises inconsistent with the ACH Rules and any applicable laws or regulations; or, which may be inconsistent with these tenets.

Tenet 7

To protect at all times confidential and nonpublic information and to never use the information without permission except as required by law.

Tenet 8

To hold all funds in transit for Originators in "Trust" and to fully account for said funds, recognizing that these funds are not the property of, or subject to use by, the Third-Party Processor.

Tenet 9

To pass these Guiding Principles on to resellers and users of the Third-Party Sender's services.

Tenet 10

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.