

ODP OVERDRAFT PRIVILEGE SERVICE POLICY

Vantage Bank offers ODP, the Overdraft Privilege Service. If your account qualifies for ODP, we will consider, without obligation on our part, paying items for which your account has insufficient or unavailable funds, instead of automatically returning those items unpaid. This document explains how ODP operates.

Transactions that May Qualify for ODP

An overdraft occurs when you do not have enough money in your account to cover a transaction. Holds placed in your account will reduce the balance available to cover transactions. The bank does not deduct the amount of preauthorized pending when determining the funds available in your account to pay items. The ODP Service applies to a variety of transactions, including checks, auto draft items and other transactions made using your checking account number, such as automatic bill payments. We can extend the Overdraft Privilege service to also consider ATM transactions and everyday debit card transactions if you approve. Absent your affirmative consent, ATM and everyday debit card transactions will not be paid under ODP.

As noted above, we retain full discretion to decline to pay any item under the ODP Program. This means we can refuse to pay any overdraft for any reason. Even if we decide to pay an overdraft item, such payment does not create any duty to pay future overdrafts. If we do not authorize and pay an overdraft, your transaction will be declined and we may assess Non-Sufficient Funds (NSF) return item fees on your account in accordance with your account agreement and the fee schedule in effect at the time of the overdraft.

Fees

For overdraft items paid, we may charge the standard per item NSF paid fee set forth in our fee schedule (currently \$35.00). Consumer accounts will be charged no more than 6 NSF paid item charges per day to pay items using your overdraft limit. For overdraft items we do not pay, we may also charge the standard per item NSF return fee in our fee schedule. An item returned NSF may be presented multiple times. Non-Consumer accounts will be assessed a fee each time items are presented. For consumer accounts should our processing system detect this representation no additional fee will be charged. Otherwise, if you notify us in a timely manner we will refund the fee assessed on the represented item. We will notify you by mail if we pay or return any insufficient or unavailable funds item on your account; however, we have no obligation to notify you before we pay or return any item. The amounts of any overdrafts, including our fees, are due and payable immediately or on demand.

Vantage Bank reserves the right granted by law to process items in any order. If there are insufficient funds in your account to pay all items presented, the order in which transactions are processed can affect the total amount of NSF fees incurred and the number of items returned unpaid. To assist you in managing your account, we are providing the following information on how we generally process items each business day. Vantage Bank first adds credits and deposits to your account balance before paying debits. The bank does not deduct pending preauthorized transactions from your available balance for the purpose of posting debit items to the account. Debits such as withdrawals, teller transactions, transfers, wire transfers, ATM and debit card transactions are paid based on the time presented. We then process ACH debits received by largest to smallest amount, followed by remaining checks which are paid in order by check number on the day they are processed.

Business accounts, will be charged overdraft interest calculated on the average daily overdrawn or uncollected balance for the statement cycle period at 1.5%. Both per item NSF fees and overdraft interest charges count toward your ODP limit. Visit our website at www.vantage.bank and click on Overdraft Program to find information on how to avoid NSF fees and for an example of how this works.

Accounts Eligible for ODP

ODP is a discretionary service in which we strive to pay items for you when funds are not available in your account. It is the Bank's obligation to operate in accordance with all safety and soundness standards. Therefore, a continual evaluation of all accounts is performed to determine if it is financially sound to honor items that may cause an overdraft situation for an account. The account criteria used for this evaluation may include:

- a) The age of the account
- b) The amount of deposits
- c) The regularity of deposits
- d) The previous overdraft history
- e) The account status with regards to any legal or administrative order or levy, bankruptcy or tax lien
- f) The status of any loan obligations with the Bank
- g) The bank's ability to reach the accountholder utilizing contact information on the account
- h) The type of account

We may in our sole discretion limit the number of accounts eligible for ODP to one account per household or per taxpayer identification number.

Participation in ODP is not mandatory. You may opt-out of the service any time by notifying one of our Customer Service Representatives or when you visit one of our branches. Furthermore, you may revoke your affirmative consent to have ATM and everyday debit card transactions considered for payment under ODP without removing other items from the service.

We offer an Overdraft Protection Transfer service in addition to ODP. Overdraft Protection Transfer allows for transfers to be made by linking another of your accounts, such as your savings account, to your checking account. Funds are transferred each day to cover transactions that would overdraw your checking account. If you establish this optional service, you will save money on the total fees you pay for overdrafts.

Overdrafts should not be used to pay ordinary or routine expenses. If at any time you feel you need help with your financial obligations, have questions, or wish to change your overdraft opt in or opt out preferences, please contact our Customer Service Department at 1-866-580-7262.