CIP Risk Analysis

General Risk

XYZ Bank, \$Asset size, # branches throughout the define region is primarily a community bank offering its services to only those living or working in the define region.

Deposit accounts can only be opened in person for new customers and may be opened via mail for existing, verified customers. Loan applications are accepted via mail and in person. Loans applicants who mail in their applications will be required to present ID prior to closing, identification will be verified by the closing agent.

CIP Risk Assessment Matrix for accounts and products

| Minimal Risk | Average Risk | Moderate Risk | High Risk | Very High Risk |
|--------------|--------------|---------------|-----------|----------------|
| 1 | 2 | 3 | 4 | 5 |

Customer Categories

| Account Type | Level of Risk |
|-------------------|---------------|
| New Customer | 2 |
| Existing Customer | 1 |

Taxpayer ID#

| Account Type | Level of Risk |
|--------------|--------------------|
| With TIN | 2 |
| Without TIN | 5 we will not open |

Occupation

| Occupation | Level of Risk |
|--------------------|---------------|
| Employed | 2 |
| Unemployed | 3 |
| Senior Citizen | 2 |
| Student | 3 |
| Non-Profit Org | 3 |
| Municipal/US Govt. | 1 |

Personal Accounts/Deposit Products

| Bank Services | Level of Risk |
|--------------------|---------------|
| Checking | |
| Individual Account | 2 |

| Joint (2 signers) | 2 |
|-----------------------|---|
| Joint (3 signers) | 3 |
| Custodial Accounts | 2 |
| POD Accounts | 2 |
| Guardianship Accounts | 2 |
| Trusts | 2 |
| Savings | 2 |
| CDs | 2 |
| IRAs | 1 |

Loan Accounts - Personal

| Account Type | Level of Risk |
|-----------------------|---------------|
| Consumer | |
| Auto | 2 |
| Home Improvement | 1 |
| Residential Mortgages | 2 |
| Equity Lines | 2 |
| Construction Loans | 2 |

For loan applications received in the mail, add: +2

Non-Personal Accounts – Deposit Products

| Account Type | Level of Risk | |
|-------------------------------------|---------------|--|
| | | |
| Checking | | |
| Regular business/non-profit | 2 | |
| Estate Accounts | 2 | |
| Trust Accounts (Living/irrevocable) | 3 | |
| IOLTA | 1 | |
| Escrow Accounts | 3 | |
| Savings | 2 | |
| CDs | 2 | |
| CDs | 2 | |

Non-Personal Accounts – Loans Products

| Level of Risk |
|---------------|
| |
| 3 |
| 2 |
| 3 |
| 2 |
| |

For loan applications received in the mail, add: +3

Non-person Organization Types

| Organization type | Add to risk factor |
|----------------------------------|--------------------|
| Corporations | +1 |
| Partnerships (written agreement) | +1 |
| Partnerships (verbal agreement) | +3 |
| LLCs | +1 |
| Non-Profit | +3 |
| Lodge/Association | +3 |
| Sole Proprietor | +2 |

Customers who have a risk assessment of 10+ will be reviewed by the branch administrator or loan officer after opening for final approval.

| The Personal Accounts | The Non-Personal Accounts |
|------------------------|----------------------------------|
| formula is as follows: | formula is as follows: |

Customer Category + Customer Category + Tax ID# + Tax ID# +

Occupation + Occupation +

<u>Personal Loan/Deposit Product = Non-Pers. Loan/Deposit Product + </u>

<u>Organization type =</u>

= Risk Assessment = Risk Assessment