Fraud Protection Checklist

Fraud is an unfortunate and permanent reality in business today. Payment fraud (primarily wire and check) continues to threaten companies, and cyber-fraud has ramped up in the past few years, with cyber syndicates as serious about their business as you are about yours. While no organization is immune from either internal or external fraud, it is imperative that you take preventive measures through use of technology and procedures.

We recommend that you review this checklist on a regular basis and make appropriate changes to your policies and procedures.

**Account Structure**
- Minimize the number of accounts
- Segregate accounts at greater risk

**Checking Supply**
- Use an established vendor
- Use unique serial number ranges for specific purposes
- Incorporate security features into check stock such as fluorescent fibers, watermarks, chemical resistance, bleach reactive stains, thermochromatic ink, etc.
- Use a unique check style for each account type
- Secure your check stock and other negotiable documents and manage under dual control
- Secure check-printing equipment and endorsement stamps and manage under dual control

**Transaction Controls**
- Review and reconcile accounts daily and monthly
- Validate vendor legitimacy and account information by calling back your known contact if an invoice is suspect or there is a change-of-address request
- Convert paper payments to electronic formats when possible
- Do not provide your EIN unless required for a validated need
- Secure your workplace by deterring nonemployees from accessing files, including trash bins
- Maintain ACH and wire transfer limits, and implement dual approval controls
- Formalize procedures to securely retain then safely shred checks after remote deposit

**Technical Security**
- Do not open attachments to an email if the subject line or email itself looks suspicious or unexpected
- Do not download from unfamiliar file-sharing sites
- Do not click on links in email claiming to come from oversight or regulatory organizations such as the BBB or IRS (they will install viruses); visit the websites by manually typing the link into your browser
- Configure your antivirus applications to update automatically
- Schedule antivirus software to automatically run daily
- Prepare, implement and practice an incident response plan
- Install perimeter email spam and malicious-content filtering
- Install a firewall as a first line of defense against hackers, with default-deny configuration

This Fraud Protection Checklist is not all-inclusive and does not guarantee protection from fraud.
Operational Security

- Validate emailed transaction requests made by colleagues by calling a known number.
- Exercise extreme caution when confronted with any request to divulge account information or banking access credentials.
- Never leave a computer unattended while using any online banking or investing service.
- Implement policies requiring employees to always log off and not wait for automated time-out.
- Never access bank, brokerage or other financial services information at internet cafes, public libraries, etc.
- Never access bank, brokerage or other financial services information from untrusted computers found in libraries, hotels, airports or other public places.

Internal Controls

- Reconcile your bank account regularly and notify your bank immediately if you spot an unauthorized transaction.
- Use dual authorization for all monetary transactions, including online ACH originations, ACH direct transmissions, wire transfers and Remote Deposit Capture (RDC).
- Formally and regularly review internet security.
- Set policies regarding passwords such that:
  - same passwords are not used for different applications
  - they are not easy to guess; e.g., pet or children's names, etc.
  - they contain special characters
  - they are changed often
- Mask account numbers and EINs on correspondence.
- Conduct third-party audit.
- Never sign checks in advance.
- Review and update signature cards annually, and when employees change positions.
- Use only dedicated, stand-alone computers for online banking where email and web browsing are not allowed.
- Set policies to disable user IDs and passwords during leaves and to discourage pre-filling passwords and user names at login.

Banking Services

- Validate the legitimacy of checks and ACH transactions presented by using Check Positive Pay, Payee Positive Pay and ACH Positive Pay.
- Designate accounts for use in electronic transactions only and block checks from debiting.
- Stop all ACH originators from debiting certain accounts by using ACH debit blocks.
- Ensure only authorized ACH originators can access your accounts for predetermined amounts by using ACH debit filters.

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