FIRST BANK

Complaint Procedures

It is the policy of First Bank to respond to customer complaints, disputes and issues swiftly and to take each complaint seriously. It is not the intention to burden the bank or customers with documentation or paperwork in order to resolve issues brought to the bank's attention in the normal course of business. First Bank promotes a quick, decisive and accurate response to all inquiries, questions and concerns brought to our attention. Not all of these situations are in the form of a written complaint presented to the bank by a customer.

The board of directors delegates the responsibility of monitoring and responding to complaints to the senior management of the bank. The Marketing Director is appointed as the complaint resolution officer (CRO). All written complaints will be directed to the appropriate functional area. The appropriate personnel will draft responses to consumers and/or regulators, and cross copy the CRO. Generally, the CRO will keep a central file of complaints and responses unless stated differently in this document, and the board of directors will review new complaints and responses at a board meeting at least quarterly. Senior management will determine if certain complaints must be brought to the attention of the board more often or if the response to the consumer and/or regulator should come from the board.

If there is any uncertainty as to where to direct a complaint, contact the Marketing Director.

GENERAL PROCEDURES FOR COMPLAINT RESOLUTION

Interviewing Institution Personnel

Institution personnel may be interviewed individually by the functional department manager or designated CRO if they are involved in the consumer's complaint or comment. Explanations of the occurrence can be requested during the interview process, and copies of any written instructions furnished to employees about the allegation will be reviewed and discussed during the interview process.

Written Report

The department manager or CRO will write a report, presenting the facts and information in a clear, objective manner. The report should:

- · Summarize the facts in a chronological order.
- · Detail the precise claims of the complainant.

- · Express the resolution desired by the complainant.
- · Indicate bank management's response to the claims of the complainant.

The report should include the recommended course of action or corrective procedures and comments on whether the complaint represents an isolated case or a pattern or practice that needs to be corrected.

Complaint Processing Guidelines

Unless otherwise prescribed by regulation, the following general guidelines should be followed regarding responses to complaints:

- Complaints should be acknowledged within 15 days after receipt of the correspondence, oral, telephonic, or electronic notification of a complaint.
- · Inquiries, comments, or objections should be answered or information provided within 15 business days after receipt.
- · Complaints not involving an on-site investigation should be fully processed and responded to within 30 days after receipt.
- Complaints involving an on-site investigation should be resolved within 45 days after receipt.

First Bank understands that many specific complaint procedures are required by regulation. It is the policy of the bank to follow the procedures listed below covering complaints in each area.

UNFAIR OR DECEPTIVE PRACTICES

Direct Complaints to: Debi Stidd or Michael Medford

Subpart A of Regulation AA defines the consumer complaint procedures that must be followed if the bank should receive a complaint by a consumer directly or through the FDIC or the Federal Trade Commission (FTC). It is the policy of First Bank to:

- · Investigate the allegation and develop a response to the complaint within 15 business days of receiving it from a consumer or regulatory agency.
- · If the bank's investigation is not complete within the above time limit, the bank will notify the consumer and the regulatory agency of its findings to date and specify a date when the bank expects to complete its investigation.

ELECTRONIC FUND TRANSFER ACT

Direct Complaints to: Hal Woodworth ACH Deposit issues

Bob StClair all others

First Bank will keep a complaint file regarding Electronic Fund Transfer Act (EFTA) errors. The bank will accept notifications of an EFTA error orally, but will require the customer to confirm the notification in writing within 10 days of providing the oral notice. Bank staff will inform the customer of this requirement and the address where the confirmation must be sent at the time of the oral notification.

Types of EFTA Errors

Errors may include but are not limited to:

- · Unauthorized electronic fund transfer
- Incorrect electronic fund transfer
- Statement error regarding an electronic fund transfer
- · Computational or bookkeeping error
- · Incorrect amount received from an electronic terminal
- Consumer's request for any documentation, information, or clarification of an electronic fund transfer to determine an error

Timely Notice

The bank will consider the notice of an EFTA error on a customer's statement timely if it is received within 60 days after the bank sent the periodic statement. The bank will consider the notice of an EFTA error timely based on documentation or clarification previously requested by the customer, if it is received within 60 days after the bank sent the clarifying information.

The bank will consider the notice of a lost or stolen access device timely if it is received within two business days after the customer discovers the loss or theft of the device. The bank will accept the notice in writing, by telephone, or in person. Customers will be asked to sign an affidavit of lost or stolen access device regardless of the means of notification.

Time Limits and Extent of Investigation

First Bank will investigate each error promptly and determine whether an error has occurred within 10 days of receiving the notice of an EFTA error, unless the error was not initiated within Alaska, resulted from a point-of-sale debit card transaction, or involved a consumer account opened less than 30 days at the bank. In these cases, the bank will determine whether an error has occurred within 20 days of receiving the notice.

If the bank is unable to determine whether an error has occurred within 10 or 20 days of receiving the notice, it may take up to 45 days to resolve the error. If the error resulted from a point-of-sale debit card transaction, occurred out of Alaska, or involved a consumer account opened less than 30 days at the bank, the bank may take up to 90 days to resolve the error.

If the bank requested but did not receive a written confirmation of the error from the consumer, the bank may extend the investigation period but will provisionally recredit the customer's account for the amount of the error including interest, if applicable, within the 10- or 20-business-day time limit.

The bank may withhold \$50 from the amount recredited if the bank has a reasonable basis to believe the error resulted from an unauthorized transfer at an automated teller machine (ATM). On debit cards cobranded with MasterCard or VISA, the consumer has no liability for unauthorized transactions unless the bank suspects fraud.

Notifying the Customer

The Incident Response Team (IRT) is responsible for ensuring that First Bank performs a prompt and thorough investigation of circumstances surrounding potential unauthorized access to sensitive customer information in order to determine the likelihood that the information has been or will be misused.

The Incident Response Team is responsible for ensuring that notification of customers is carried out only if the investigation determines that misuse of its information about a customer has occurred or is reasonably possible.

Any disclosure of information security incidents at First Bank, including reports to regulators and notifications to customers, must be approved in advance by the Incident Response Team.

The Incident Response Team will maintain a procedure for customer notifications of information security incidents, including templates for customer letters and call center scripts. Management must approve the procedure and templates, and any periodic changes to them.

Staff is required to use the approved procedure and templates, with reasonable modification for the immediate incident circumstances, for all customer notification scenarios.

The bank will notify the customer in writing of the result of its investigation within three business days after completing the investigation and will correct the error within one business day if it determines an error has occurred.

The bank will notify the customer in writing that it is provisionally recrediting the account within two business days and will give the customer full use of the funds during the investigation.

The report of the results of the bank's investigation will include:

- · A written explanation of the findings
- A statement indicating the customer's right to request the records the bank used to make its determination
- A statement that an error was made, the nature of the error, and that provisional credit (if given) is final
- A statement that an error was not made, the bank's reasons for that conclusion, and that the consumer's account will be debited for the credit provisionally given, if appropriate
- The date and amount debited from the account
- A statement that the bank will honor checks, drafts, or similar instruments payable to third parties and preauthorized transfers from the customer's account up to the amount of the error without an overdraft charge for five business days after the date of the notification letter

Complaint File

The deposit operations department and electronic banking department will maintain the EFTA complaint file for the specific area of responsibility. The bank will keep all documentation regarding consumer complaints for two years from the date of the first written or oral notification of an error from a customer. The complaint file will contain:

- · A copy of the notice of error
- · All correspondence to and from the customer
- · All documentation used in the investigation

CHECK 21 COMPLAINT PROCEDURES (excerpt):

The complete Check 21 Policy and Procedures may be found in the Operations Manual under section: *Regulations – Subpart D: Check 21 Policy and Procedures*

Expedited Re-credit for Consumers

Circumstances giving rise to a claim

The expedited re-crediting provisions for claims of incorrect charges are similar to those under the EFTA (Regulation E). A consumer may be entitled to a re-credit if the consumer, in good faith, claims that

- The substitute check was not properly charged to the consumer's account;
- The consumer suffered a loss:
- Production of the original check or a sufficient copy of the substitute check is necessary to determine if the charge was proper.

Note: The expedited re-crediting provisions do not apply if the check is not a substitute check as defined by the statute.

Procedures for making claims

Timing of the claim

- Claims must be made within 40 calendar days after the statement is delivered or the date the substitute check is available to the consumer, whichever is later. Longer periods are permitted for extenuating circumstances.
- Claims made orally are timely if the oral claim was received in time (even if the bank requires claims to be in writing)

Content of the claim [Refer to **Request for Expedited Re-credit Claim** form]

- Description of the claim, including why the consumer believes their account was improperly charged for the substitute check
- Statement of loss and an estimate of the amount of the loss
- Reason why production of the original or a better copy is necessary to determine whether or not the charge is valid
- Sufficient information to identify the substitute check

If a customer attempts to make a claim but fails to provide all of the required information, then the bank must tell the customer that the claim is not complete and identify the information that is missing.

Form and submission of claim

- First Bank prefers that claims be submitted in writing, however
- Customers may submit their written claims electronically or verbally
- The bank will immediately inform all customers who make an oral claim about the written claim requirement and tell them that the bank must receive the written claim within 10 business days.
- Time periods will be computed from the date the written claim is received by the bank

Action on claims

Sample notices are included at the end of this section.

Valid Consumer Claim

- Re-credit the consumer's account for the amount of the loss, up to the amount of
 the substitute check, plus interest if the account is interest bearing, no later than
 the end of the business day after the banking day on which the bank makes that
 determination.
 - Send notice to the customer [C-22 Expedited Re-credit Claim, Valid Claim Refund Notice] no later than the business day after the banking day on which the bank re-credits the consumer account.

Invalid Consumer Claim

- Send notice to the customer [C-24 Expedited Re-credit Claim, Denial Notice] no later than the business day after the banking day on which the bank makes that determination.
 - o Include the original check or a sufficient copy
 - o Demonstrate to the consumer that the substitute check was properly charged or the consumer's warranty claim is not valid
 - Include the information or documents (in addition to the check or sufficient copy), if any, on which the bank relied in making its determination or a statement that the consumer may request copies of such information or documents.

Re-credit Pending Investigation

- Send notice to the customer [C-23 Expedited Re-credit Claim, Provisional Refund Notice]
- If the bank cannot determine the validity by the 10th business day, it must recredit the consumer's account for the amount of the consumer's loss, up to the lesser of the amount of the substitute check or \$2,500, plus interest on that amount if the account is an interest bearing account.
- If the consumer's claim is valid, the bank must re-credit the consumer's account for the remaining amount of the consumer's loss, if any, up to the amount of the substitute check, plus interest if the account is interest bearing, no later than the end of the 45th calendar day after the banking day on which the bank received the claim.

Reversal of Re-credit

- Send notice to the customer [C-25 Expedited Re-credit Claim, Reversal Notice] no later than the business day after the banking day on which the bank made the reversal.
- Credit may be reversed if it is determined that the consumer's claim is not valid.

Availability of Re-credit

- Next day availability
- Some exceptions apply:

Safeguard Exceptions [Delayed Availability]

Exceptions are made for new accounts, repeated overdrafts, and "reasonable cause to believe" that fraud is involved.

- New accounts opened less than 30 days
- Repeated overdrafts
 - O Six or more business days overdrawn in 6 months
 - Two or more business days overdrawn in 6 months if \$5,000 or more
 - Reasonable cause to believe that the claim is fraudulent.

Overdraft Fees: The bank cannot charge overdraft fees to a consumer account until the fifth calendar day after notice of recredit has been sent.

• Interest and expenses (including costs and reasonable attorney's fees and other expenses of representation) related to the substitute check

Offset of re-credits

The amount of damages a person receives will be reduced by any amount that the person receives and retains as a re-credit.

Comparative negligence

- If a person incurs damages that resulted in whole or in part from that person's negligence or failure to act in good faith, then the amount of any damages due to that person will be reduced in proportion to the amount of negligence or bad faith attributable to that person.
- Nothing under comparative negligence reduces the rights of a consumer or any other person under the UCC or other applicable provision of federal or state law

Timeliness of action

Delay by the bank beyond any time limits is excused if the delay is caused by

- interruption of communication or computer facilities
- suspension of payment by another bank
- war
- emergency conditions
- failure of equipment
- other circumstances beyond the control of the bank, as long as the bank uses diligence as the circumstances require

Jurisdiction

A person may bring an action in any US court to enforce a claim **within one year** of the date on which the person's cause of action accrues.

Notice of claims

Unless a person gives notice of a claim under this section to the warranting or indemnifying bank within 30 calendar days after the person has reason to know of both the claim and the identity of the warranting or indemnifying bank, the warranting or indemnifying bank is discharged from liability to the extent of any loss caused by the delay in giving notice. A timely re-credit claim by a consumer under 229.54 constitutes timely notice under this paragraph.

MORTGAGE SERVICING ERRORS UNDER THE REAL ESTATE SETTLEMENT PROCEDURES ACT

Direct Complaints to: Debi Stidd or Michael Medford

Section 6 of the Real Estate Settlement Procedures Act (RESPA) and section 3500.21(e) of the Department of Housing and Urban Development's (HUD's) Regulation X have certain requirements concerning the bank's duty to respond to borrower inquiries about residential mortgage loans. Notification of complaints, issues, inquiries and disputes may come orally, electronically or in some other form. Any form of contact will be given prompt attention, however, the bank reserves the right to request details in qualified written form in order to obtain the necessary information to resolve the issue.

Qualified Written Request

It is the policy of First Bank to respond to qualified written requests from borrowers about the servicing of their residential mortgage loans within the time limits prescribed by law.

The regulation defines a qualified written request as any written correspondence, other than notice on a payment coupon or other payment medium supplied by the servicer, that:

- Includes, or otherwise enables the servicer to identify, the name and account of the borrower
- Includes a statement of the reasons for the belief of the borrower that the account is in error or provides sufficient detail to the servicer regarding other information sought by the borrower

The bank is not required by regulation to respond to any request that it receives more than one year after the loan servicing was transferred to another servicer or paid in full. However, the bank may choose to do so in the interest of customer service.

Responses to Inquiries

The bank will provide a written response acknowledging receipt of any correspondence relating to the servicing of a mortgage loan within 20 business days (excluding legal

public holidays, Saturdays, and Sundays). The written response will take the place of a written acknowledgment of receiving the inquiry.

Action Regarding Inquiries

After receiving the qualified written request, the bank will take action on the request within 60 business days (excluding legal public holidays, Saturdays, and Sundays) or less. The bank will document the actions (before and after) taken in response to the borrower's request and keep the documentation in a file for **five years** after the date of the request/inquiry. The file will be kept in the Loan Operations Department.

The appropriate documentation will include the following:

- Any corrections made to the account of the borrower, including the crediting of any late charges or penalties, and a written notification of such correction given to the borrower (including the name and telephone number of a representative of the servicer who can provide assistance to the borrower)
- A written explanation or clarification of the results of the bank's investigation provided to the borrower that details the following:
 - To the extent applicable, a statement of the reasons the institution believes the account of the borrower is correct
 - Information requested by the borrower or an explanation of why the information requested is unavailable or cannot be obtained by the servicer
 - Name and telephone number of an individual employed by, or the office or department of, the servicer who can provide assistance to the borrower

PERIODIC BILLING ERRORS (REGULATION Z)

Direct Complaints to: Debi Stidd or Michael Medford

Regulation Z has specific requirements for handling consumer complaints. The regulation provides specific procedures for consumers to follow in questioning creditors about items that appear on their periodic billing statements and also specifies procedures that creditors need to follow after receiving billing inquiries from customers. It is the policy of First Bank to comply with all of the requirements of Regulation Z when dealing with billing errors.

Types of Errors

The regulation defines billing errors as:

- · Posting a credit that was not made by the consumer
- Extension of credit that is not identified in the periodic statement
- Billing for property or services not accepted by the consumer or not delivered to the consumer as agreed
- Institution's failure to properly credit a payment or other credit issued to the consumer's account
- · Computational or accounting error made by the institution
- · Consumer's request for additional clarification on an item appearing on his or her periodic statement, including documentary evidence
- Institution's failure to mail or deliver a periodic statement to the consumer's last known address if that address was received by the institution, in writing, at least 20 days before the end of the billing cycle

Acknowledging Notice of the Error

After receiving a billing error notice, the bank will send the consumer a written acknowledgment confirming that the bank received the error notice. The bank will send the acknowledgment to the consumer within 30 days of receiving the error notice. The bank will not provide a written acknowledgment if:

- The consumer notifies the bank (either orally or in writing) that he or she is withdrawing the error notice.
- The bank resolves the dispute within the 30-day period.

Timing of Investigation and Resolution of Errors

The bank will resolve the billing error within 90 days or less, or within two billing cycles, of receiving the error notice from the customer. Two billing cycles means two full cycles after the end of the billing cycle in which notification was received. For example, if the bank receives the notification in mid-August, it has until the end of October to resolve the dispute.

The Loan Operations Department will keep full documentation of its investigation in a file in the loan operations department and will maintain these records for **two years** from the date of receiving the notice.

Corrective Action

If the bank determines that an error has occurred, it will credit the consumer's account for the disputed amount (and related finance charges) and will send a notice to the consumer that corrective action has been taken. The corrective notice will be sent to the customer in a separate letter and filed in the error resolution file.

If the bank determines that no billing error has occurred, the bank will notify the consumer within 90 days or within two complete billing cycles, whichever is less. In the notification, the bank will:

- Mail or deliver to the consumer an explanation of the reasons it believes the billing error alleged by the consumer is incorrect in whole or in part.
- If the consumer requests, furnish copies of documentary evidence supporting the bank's conclusions.
- · If a different billing error occurred, correct the billing error and credit the consumer's account with any disputed amount and related finance or other charges, as applicable.

If the bank has determined that a consumer owes all or part of the disputed amount, including related finance or other charges, it will:

- Promptly notify the consumer in writing of the portion of the disputed amount and related finance or other charges that the consumer still owes and when payment is due.
- · Allow any time period during which the consumer can pay the amount due without incurring additional finance or other charges.

Resolution of Error Notices — Credit Cards

If the consumer submits a billing error notice alleging nondelivery of property or services, or that the information appearing on a periodic statement is incorrect because a person honoring the consumer's credit card has made an incorrect report to the card issuer, the bank will not deny the assertion unless it conducts a reasonable investigation and determines that the property or services were actually delivered, mailed, or sent as agreed or that the information was correct.

Relation to Electronic Fund Transfer Act and Regulation E

If an extension of credit is incident to an electronic fund transfer, under an agreement between the bank and a consumer to extend credit when the consumer's account is overdrawn or to maintain a specified minimum balance in the consumer's account, the bank will comply with error resolution procedures set forth in the policy under Regulation E rather than the requirements under Regulation Z.

COMMUNITY REINVESTMENT ACT/FAIR LENDING

Direct Complaints to: Michael Medford

The bank will keep all written comments, including complaints, about its record of helping to meet the credit needs of its community and its responses to those comments in its public Community Reinvestment Act (CRA) file for the **current year and the two previous calendar years.** The bank will make sure the letters are reviewed to ensure that they do not contain any statements that reflect adversely on the good name or reputation of any persons other than the bank.

Procedures for Fair Lending/CRA Complaints

The bank will act on oral or written complaints immediately. All complaints will be referred to Michael G. Medford.

- The bank will forward a letter to the customer and, if appropriate, the FDIC, acknowledging the complaint and noting that a formal response will be forthcoming.
- The compliance officer or his or her designee will thoroughly review and investigate complaints.
- The compliance officer will maintain complete documentation concerning the complaint and the results of the bank's investigation.
- When the investigation is complete, the bank will send a letter to the customer and, if appropriate, the FDIC, revealing the results of its investigation.
- If the situation indicates a significant error on the part of the bank, monetary shortage to the customer, or any other error affecting the customer, a bank officer will call the customer, explain the situation, offer apologies, and request a meeting to discuss any corrective action and/or compensation for harm caused.
- The bank will handle each complaint fairly and consistently and within the time frames prescribed by law, or within 30 days of the day the bank received the complaint from the customer or the FDIC, whichever is earlier.

The compliance officer or designee will maintain a log concerning fair lending and CRA complaints and will report to the board on a quarterly basis concerning the complaints, detailing the subject matter, results of the investigation, and resolution of each complaint.

FAIR CREDIT REPORTING ACT AS AMENDED BY THE FAIR AND ACCURATE CREDIT TRANSACTIONS ACT OF 2003 (FACTA)

Direct Complaints to: Patrice Gray

The board directs management to implement procedures to respond to credit reporting agencies and consumers regarding the accuracy of information sent to the credit bureau about the bank's customers and to correct information that may be inadvertently reported incorrectly. Specifically, management will have procedures in place to:

- · Investigate and, if appropriate, correct and update information within 30 days when the bank is notified by a credit reporting agency or a customer that the information the bank reported is incorrect.
- Notify the appropriate credit reporting agency within 30 days when the bank is notified by a customer that the information the bank reported is incorrect.

Responsibilities of Furnishers of Information to Consumer Reporting Agencies (RA)

FACTA enhances the Fair Credit Reporting Act by requiring institutions to improve the accuracy and integrity of information furnished to credit reporting agencies (RA) by prohibiting furnishers from reporting information that they know, or has reasonable cause to believe that the information is inaccurate. The Act also requires the bank to promptly correct inaccurate information reported to RAs.

First Bank will not report information with actual knowledge or belief that the information is inaccurate.

First Bank will not report inaccurate information after notice has been provided and a confirmation of errors has been performed.

First Bank will report a notice of closed account when the consumer voluntarily closes the account with information regularly furnished to RA for the period that the account is closed.

Obtain a clear definition of voluntary closure as it relates to FCRA

Any bank representative that reasonably believes information or payment history of a credit transaction may be inaccurate should contact the Collections Department immediately.

The integrity of customer service and regulatory requirements demands that any and all incomplete or inaccurate information reported to RA shall be corrected immediately. Loan record modifications should be referred by the Collections Department to the Loan Operations Supervisor. Upon completion of necessary modifications, the Collections Department will contact the RA to modify the consumer's records as appropriate.

A notification of dispute or possible inaccurate reporting will be responded to by the Collections Department within 21 days of receipt of notification. Notification of

complaints, issues, inquiries and disputes may come orally, electronically or in some other form. Any form of contact will be given prompt attention, however, the bank reserves the right to request details in qualified written form in order to obtain the necessary information to resolve the issue.

All documentation of disputes, investigation, maintenance of accounts and resolution will be maintained in a file with the Collections Department for 5 years.

Notification from a First Bank representative:

- Communicate with bank representative to determine details of possible misreporting
- Investigate details using all relevant resources
- After investigation, if it is reasonably believed that the credit information was reported properly, provide notification of the fact to the bank representative who submitted the claim
- If the investigation substantiates an inaccuracy, proceed to the Automated Universal Data (AUD) process for E-OSCAR out-of-process updates
- Contact the Loan Operations Supervisor for loan record maintenance

Direct Consumer Dispute:

- The dispute must be in writing from the customer
- The notification must contain specific information regarding the dispute and an explanation of the basis for the dispute
- The Collections Department must submit and AUD report through E-OSCAR to provide the reporting agencies with notice that the account is under dispute by the customer within 5 days of receipt of dispute or prior to the next monthly credit reporting cycle, whichever is sooner
- The Collections Department will conduct an investigation of the dispute and review all relevant information provided by the customer and any other resources necessary
- Upon completion of the investigation, if the results substantiate the dispute, file the AUD in E-OSCAR and notify the Operations Supervisor for any loan record maintenance
- See AUD process in E-OSCAR

If the dispute is believed to be irrelevant or frivolous

- The Collections Department will notify the customer in writing within 5 days of the determination
- The notice must contain the reasons for the determination and identify any information or documentation used in the investigation to make the determination

Dispute from a Consumer Reporting Agency (RA)

Disputes can be received in writing from an RA or electronically via the Automated Consumer Dispute Verification (ACDV) process in E-OSCAR. The Collections Department will search E-OSCAR daily for receipt of ACDV files that require a response.

Upon receipt of a written dispute:

- The Collections Department will conduct an investigation of the dispute and review all relevant information provided by the RA and any other resources necessary
- Upon completion of the investigation, complete the dispute form and return to the RA as to whether the dispute was supported or whether the dispute was determined to be irrelevant or frivolous.
- If the dispute was supported by the investigation, file an AUD report through E-OSCAR and notify the Loan Operations Supervisor for loan record maintenance

Upon receipt of an ACDV file for dispute:

- The Collections Department will conduct an investigation of the dispute and review all relevant information provided by the RA and any other resources necessary
- Upon completion of the investigation, complete the ACDV response through E-OSCAR
- If the dispute was supported by the investigation, contact the Loan Operations Supervisor for loan record maintenance

First Bank uses a secure web-based system to provide complete and accurate credit reporting information. E-OSCAR, Online Solution for Complete and Accurate Reporting supports the Metro II file reporting consistent with industry standard and the bank's operating system. E-OSCAR provides real time access to and update of consumer dispute records.

The ACDV process tracks and manages an ACDV initiated by a Consumer Reporting Agency (RA) on behalf of a consumer and routs it to First Bank. The Collections Department returns the ACDV to the RA with any updated information and that updated information is sent to the other national RAs.

The Automated Universal Data (AUD) process is designed to transmit out-of-cycle updates to a single tradeline electronically from First Bank to RAs. This allows the Collections Department to make an update prior to sending the normal monthly credit-reporting file.

Blocking Information Resulting from Identity Theft

FACTA requires that a consumer reporting agency (RA) block the reporting of any information that the consumer identifies as information that resulted from an alleged ID theft. The RA must then notify the furnisher (First Bank) of that information who must block that information from future reporting. Further, the law allows the consumer to submit an identity theft report directly to the furnisher or financial institution, and measures must be taken to block the reporting of that information.

Oral, electronic or written requests to block information from the RA or customer must be submitted to the Collections Department. A request to block information should be addressed as follows:

- Action should be taken within 30 days of the RA or consumer request
- A copy of the ID theft report must be submitted to First Bank
- The Collections Department will research the claim to insure validity, whether the consumer was identified properly prior to loan closing and whether the consumer filing the claim received benefit from the credit account.
- If the ID theft claim is valid, the loan record must be maintenanced to block the information from being reported, contact the RA to arrange for the removal of any previously reported incorrect information, establish an account note on the account and freeze the account. The Loan Operations Supervisor should be contacted to freeze the account, maintenance the credit reporting codes and set the ID Theft Victim account note.
- The Collections Department will cease any collection efforts with the consumer filing the claim.
- The Collections Department should consult with the First Bank attorney.
- The Collections Department will maintain the file and documentation relating to the fraud claim for 5 years.

If the request to block information is declined because First Bank has reasonably determined that the claim was based on a material misrepresentation of fact or the consumer filing the claim obtained possession of goods, services or money as a result of the credit transaction, the Collections Department will notify the requestor (RA or consumer) in writing of the decision within 5 days of that decision.

- The Collections Department should consult with the First Bank attorney regarding further action and determine if any loan re-classification is necessary.
- If the block and warning flag have already been established, those procedures should be reversed to reinstate the transaction records, reporting and collection efforts. The account note should be modified to indicate that the ID theft report was filed and rejected and for the viewer to consult with the Collections Department.
- Documentation will be retained for 5 years.

PRIVACY OF CUSTOMER INFORMATION/WEB SITE

Direct Complaints to: Eric Bjella

The board directs management to implement procedures to respond quickly to complaints from customers regarding the privacy of their financial information.

Specifically, the bank will include information about how the bank will respond to consumer questions or complaints about how the bank handles and protects personal information. This information or the contact person's name will be included in the bank's privacy policy and on the bank's web site.

Reviewed February 2008

Example of the Contact Us web page:

Our customer's financial questions and needs are very important. Therefore, we offer several efficient options you may use to contact us:

Branch Information

Branch address, telephone, and facsimile information

Customer Service	1-800-478-6101	Monday - Friday	9:00am - 5:30pm
Lost or Stolen Debit or ATM Card			
MasterMoney™ Card	1-800-682-6075	7 days a week	24 hours a day
MasterMoney™ Card or Alaska Option ATM Card First Bank Electronic Banking Center	1-888-220-4446	Monday - Friday	8:00am - 5:00pm

First Bank Whistleblower Procedures in Compliance with Section 301 of the Sarbanes-Oxley Act

Any questionable accounting or auditing matters perpetuated by First Bank or the management and staff there of can be confidentially and anonymously reported to first Bank's Internal Audit Committee by sending an email to the following address: auditcommitteechairman@firstbankak.com or a letter to the attention of the Audit Committee Chairman, First Bank, PO Box 7920, Ketchikan, AK 99901.