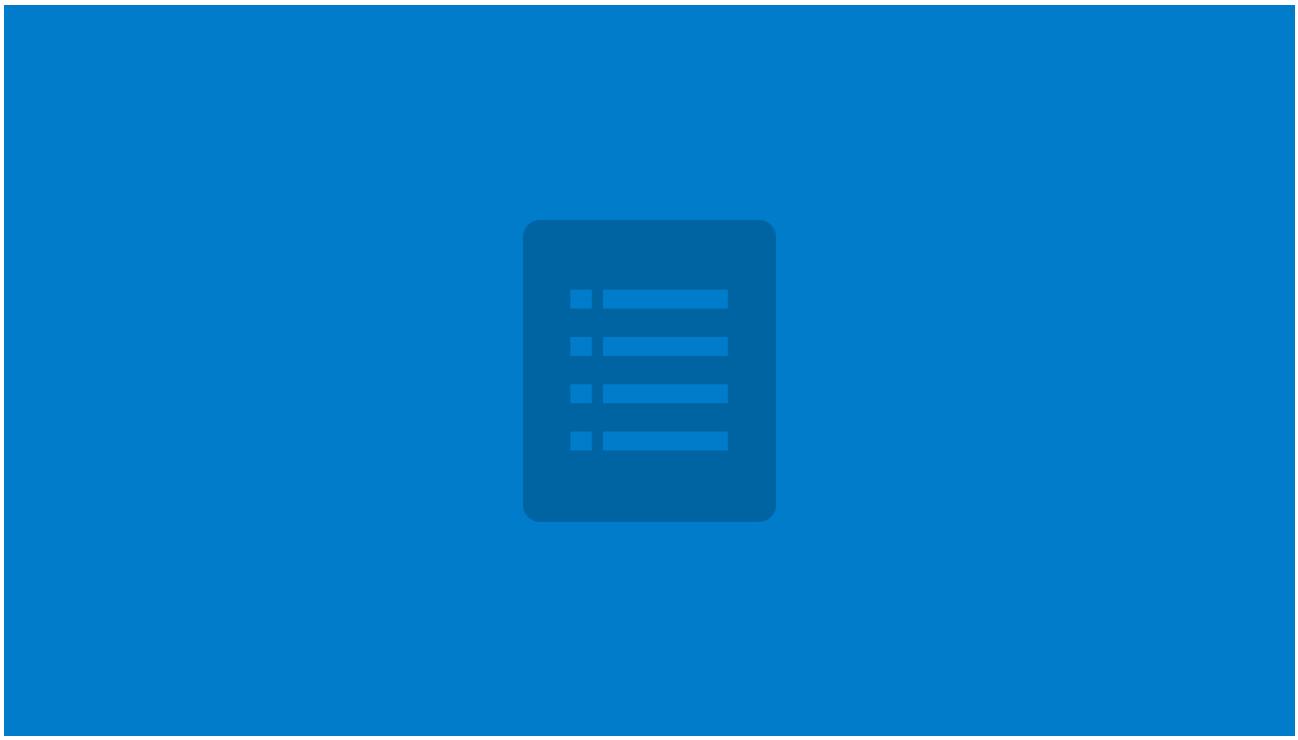
Bank Advertising Checklist



Advertising examples include

- [ ] Announcements on radio, television, or public address systems
- [ ] On-line messages, such as e-mail
- [ ] Information on Internet websites, including the bank's own website
- [ ] Direct mail literature
- [ ] Printed material on any exterior or interior sign
- [ ] Point of sale displays
- [ ] Telephone solicitations, telephone voice response systems and telephone hold messages
- [ ] Letters sent to customers as part of an organized solicitation of business
- [ ] Messages on account statements offering additional bank products or services
- [ ] Messages on ATM screens promoting bank products or services

Examples of messages that would NOT be considered advertisements include:

- [ ] Direct personal contacts, such as follow up letters, cost estimates for individual consumers, or oral or written communication relating to the negotiation of a specific transaction
- [ ] Informational material, for example, interest rate and loan term memos, distributed only to business entities
- [ ] Notices required by federal or state law, if no additional information other than that required is displayed
- [ ] News articles the use of which is controlled by the news medium

- [ ] Market-research or educational materials that do not solicit business
- [ ] Communications about existing accounts (such as a promotion encouraging additional use of an existing credit card account).

General Requirements

- [ ] Does ad contain only accurate information that is not misleading?
- [ ] Does ad include "Member FDIC" in conjunction with the bank name? (see below if ad includes nondeposit investment products)
- [ ] Does ad include "Equal Housing Lender" logo (house with "=" in the middle) and legend?
- [ ] Does the ad use pictures and images that tend to portray the bank as inclusive rather than exclusive with relation to race, sex, handicap, or any other prohibited discriminatory basis?

Lending Advertisements - Closed End Credit

- [ ] Does the ad state only specific credit terms that actually are or will be arranged or offered by the bank?
- [ ] Does the ad state finance charge rates only as an "annual percentage rate" using that term
- [ ] If the annual percentage rate is stated and may increase after consummation, does the ad disclose that fact?
- [ ] If the simple interest rate applied to the unpaid balance is stated in the ad, is it stated only in conjunction with, and not more conspicuously than, the APR?
- [ ] Does the ad state the number of payments or period of repayment, the amount of any payment, or the amount or rate of any finance charge? If so, does the ad also include, clearly and conspicuously, the terms of repayment (number, amount and frequency of payments) and the "annual percentage rate" using that term (or the abbreviation, "APR")? An example of one or more typical extensions of credit with a statement of all terms applicable to each may be used.
- [ ] If the ad is a multiple-page ad, does the ad include a table or schedule of all required disclosure information in one place, and does each reference to number of payments or period of repayment, the amount of any payment, or the amount or rate of any finance charge include a clear reference to the page on which the table or schedule is located?
- [ ] Does the ad contain a statement that offer of credit is subject to credit approval?

Lending Advertisements - Open End Credit

- [ ] Does the ad state only specific credit terms that actually are or will be arranged or offered by the bank?
- [ ] Does the ad state clearly and conspicuously any minimum, fixed, transaction, activity or other similar charge that may be imposed?
- [ ] Does the ad state clearly and conspicuously any periodic rate that may be applied expressed as an annual percentage rate, using that term (or the abbreviation, "APR")?
- [ ] If the plan provides for a variable periodic rate, does the ad disclose that fact?
- [ ] Does the ad disclose any membership or participation fee that could be imposed?
- [ ] Does the ad contain a statement that offer of credit is subject to credit approval?

Additional Requirements for Home Equity Open End Credit

- [ ] Does the ad clearly and conspicuously state any loan fee that is a percentage of the credit limit under the plan?
- [ ] Does the ad clearly and conspicuously state an estimate of any other fees imposed (by the bank or third parties, such as appraisers) for opening the plan? These fees may be stated as a single dollar amount or a reasonable range.
- [ ] Does the ad clearly and conspicuously state the maximum annual percentage rate that may be imposed in a variablerate plan?
- [ ] If the ad states an initial annual percentage rate that is not based on the index and margin used to make later rate adjustments, does the ad also state the period of time such rate will be in effect? Also, does the ad state, with equal prominence to the initial rate, a reasonably current annual percentage rate that would have been in effect using the index and margin?
- [ ] If the ad contains any statement about any minimum periodic payment, does the ad also state, if applicable, that a balloon payment may result?
- [ ] If the ad makes any reference to tax deductibility, does the ad state, "Consult a tax advisor regarding the deductibility of interest."?
- [ ] Does the ad avoid referring to a home-equity plan as "free money" or any other similar misleading terms?

Deposit Advertisements

- [ ] Does the ad refer to an account as "free" or "no cost" (or use any similar term) only if no maintenance or activity fee may be imposed on the account?
- [ ] Does the ad avoid using the term "profit" in referring to interest paid on an account?
- [ ] If the ad states a rate of return, does it state the rate as an "annual percentage yield", using that term? The abbreviation "APY" may be used, provided that the term "annual percentage yield" is stated at least once in the ad.
- [ ] If the ad states any other rate, is it only the simple "interest rate," using that term and is it stated in conjunction with, but not more conspicuously than, the APY to which it relates?
- [ ] If the ad refers to an account that has activity restrictions (savings accounts and money market accounts), does the ad indicate those activity restrictions that apply?
- [ ] If the ad states the APY, does it also state, to the extent applicable, clearly and conspicuously.
- [ ] If the ad states a bonus, does the ad also state the following, to the extent applicable, clearly and conspicuously .
- [ ] For deposit advertising requirements above listed in italics, these may be omitted in advertisements in certain media.
- [ ] Signs inside the premises of the bank are not subject to any of these deposit advertising requirements.

Nondeposit Investment Products (including Brokerage, Insurance, Annuities)

- [ ] Does the ad avoid any misleading information about the nature of these products or the lack of FDIC insurance?
- [ ] Does the ad avoid use of the legend "Member FDIC" as it relates to these products?
- [ ] Does the ad include clear and conspicuous disclosure of the following (as applicable): NOT A DEPOSIT, NOT FDIC-INSURED, NOT INSURED BY ANY FEDERAL GOVERNMENT AGENCY, NOT GUARANTEED BY THE BANK, MAY GO DOWN IN

VALUE

- [ ] Does the ad clearly and conspicuously identify the third party company selling the investment product?
- [ ] If the ad combines advertising for nondeposit investment products and FDIC-insured deposit products, is the information about nondeposit investment products clearly segregated from the information about the FDIC-insured products in the ad?
- [ ] If the ad is for a product sold by a third party company (such as UVest), has the ad been approved by their compliance group?

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