



Do-Not-Call Policy

December 2011

Purpose

The federal government, through the Federal Communications Commission ("FCC") and the Federal Trade Commission ("FTC"), and several states have enacted laws governing how companies contact consumers through use of the telephone. Ossian State Bank will adhere to all applicable and enforceable federal and state laws and regulations governing outbound telephone calls for the protection of the privacy of telephone consumers. This policy provides the guidelines necessary to follow all applicable and enforceable federal and state Do-Not-Call laws.

Scope

This policy applies to all employees, vendors, and others affiliated with or doing business with the Bank who telephone consumers.

The Compliance Officer/Director is responsible for overseeing the development, implementation, and maintenance of this policy. This policy will be reviewed by the Board of Directors on an annual basis.

Statement

The Bank does not solicit consumers on the telephone to buy products or services. They are only offered through signature approval or online agreements. Likewise, the Bank does not solicit customers through third party marketing vendors. Customer information is never sold or traded to any third party marketing vendors for the purpose of soliciting account holders of the Bank.

Guidelines

All employees will be given a copy of these guidelines for awareness training and to enable them to take actions consistent with these guidelines.

Do-Not-Call Lists. The federal government and several states have adopted "Do-Not-Call" lists that allow consumers to place their numbers on a list that prevents telephone solicitations, except in certain limited circumstances. The Bank will subscribe to applicable federal and state Do-Not-Call lists.

Do-Not-Call List Exceptions. Most Do-Not-Call laws allow businesses and other entities to make telephone solicitations to certain consumers even though their number may appear on a Do-Not-Call list. Generally, these exceptions apply to (1) businesses with an "Established Business Relationship" with the consumer; (2) a consumer who has specifically consented to allow the business to call him or her; (3) charitable organizations; and (4) political entities. The Established Business Relationship exception will apply most frequently to the activities the Bank

undertakes for consumers. The Bank may contact consumers that fall within these exceptions, based on information received from each client.

Company-Specific Do-Not-Call Lists. Do-Not-Call regulations allow a consumer to place his or her telephone number on a Company-Specific Do-Not-Call List that prohibits a business from contacting that consumer even if the consumer and the business have an Established Business Relationship. Typically, a consumer's Company Specific Do-Not-Call Request will become effective 30 days after the consumer makes the request. The Bank will honor Company Specific Do-Not-Call Lists based on information provided by the consumer.

Use of Automated or Predictive Dialers. These laws dictate when and how the Bank can use automated or predictive dialers to call consumers. The Bank does not use automated or predictive dialers to place telephone solicitations.

Use of Artificial or Prerecorded Voices. These laws dictate how and when the Bank can use artificial or prerecorded voice services to call consumers. The Bank does not use automated or prerecorded voices to place telephone solicitations.

Abandoned Calls. Under the FCC's rules, when using an automated or predictive dialer the Bank cannot disconnect an unanswered telephone solicitation call, when using an automated or predictive dialer until either 15 seconds have elapsed after the first ring, or after four (4) rings. The FCC classifies a telephone solicitation that does not meet these requirements as an "abandoned call". The Bank does not use automated or predictive dialers to place telephone solicitations.

Wireless Telephone Numbers. The Bank will apply all FCC Do-Not-Call rules to wireless telephone numbers.

Caller ID Requirements. The Bank will not block Caller ID information. In accordance with the FCC rules, the Bank will transmit Caller ID information.

Time of Day Restrictions. Representatives of the Bank will not place telephone solicitation calls to a residential telephone number before 8:00 a.m. or after 9:00 p.m. Monday thru Saturday, or Sunday 9:00am –9:00pm.

Identification of Telephone Solicitation Persons representing the Bank will for purposes of telephone solicitations clearly state the name of the organization, their name, the purpose of their call, and provide to the caller a telephone number through which the Bank may be contacted.

Facsimile Restrictions. The Bank will not dial any telephone number for the purpose of determining whether the line is a facsimile or voice line. The Bank will not use facsimile machines, computers, or any other device to send "unsolicited advertisements" to any telephone facsimile machine.

Handling Do-Not-Call Questions

During a telephone call with a customer, employees may encounter requests:

- Information about Do-Not-Call legislation;
- To be placed on the National Do-Not-Call Registry;
- To be placed on a state Do-Not-Call list;
- To be placed on a Company-Specific Do-Not-Call List; or
- A copy of the Bank's Do-Not-Call Policy.

Please handle each of these requests in accordance with the procedures set out below. If a request is received from a consumer that does not fall within any of these categories, please contact your supervisor immediately.

Requests for information about Do-Not-Call Legislation. Please direct the customer to the FCC's telephone number at 1-888-225-5322 or the FCC's website located at <http://www.fcc.gov/cgb/donotcall/>

Requests to be placed on the National Do-Not-Call List. Please direct the customer to the FCC's Do-Not-Call telephone number at 1-888-382-1222 or the FCC's website located at <http://www.donotcall.gov>.

Requests to be placed on a State Do-Not-Call List. Please direct the customer to the state government's Do-Not-Call telephone number at 1 (888) 834-9969 or the state government's website for the state referenced by the customer, located at <http://www.in.gov/attorneygeneral/2445.htm>.

Requests to be placed on a potential Bank Specific Do-Not-Call List. Please ask for the consumer's full name, telephone number, address, and social security number. Send this information to the Compliance Officer/Director.

Requests for a copy of this Do-Not-Call Policy. Please ask for the consumer's name and address and forward that information to the Bank's New Accounts area. The account representative will then send a copy of the Do-Not-Call Policy to the consumer.

Training

Training will be held at least annually to ensure that affected individuals understand the provisions of this policy, as well as the implications upon their responsibilities.

If you have any questions about the Do-Not-Call Policy, please call the Bank at 260-622-4141.