Customer Identification Program (CIP)

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Due to the USA Patriot Act, all banks are required by federal regulation to implement Customer Identification Programs (CIPs) to prevent financing of terrorist operations and money laundering. This document provides information about HSA Bank's CIP process and the steps taken to ensure HSA Bank is able to verify each customer's identity. The following information is required and collected by HSA Bank for our Customer Identification Program (CIP):

- First and Last Name
- Residential Address
- Date of Birth
- Social Security Number
- Home or Business Phone

The information above is used to validate the accountholder's identity and will be sent to HSA Bank's vendor to validate against their data system. The accountholder passes the CIP process when certain combinations of the information above match.

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There are various ratings that an accountholder may receive. The rating will be determined by the reason why the CIP process was failed. The rating may result in account closure if not resolved within 90 days.

The following is a list of scenarios that may prevent an individual from passing the CIP process*

- Name matches Office of Foreign Assets Control (OFAC) registry listing
- SSN was issued prior to date of birth
- SSN registered as deceased
- Day, year or month of birth does not coincide with SSN
- SSN does not coincide with name and address
- State of Nevada does not provide SSN listings for credit/IDverifications*

This list is not comprehensive but is provided to you as an example of the types of possible scenarios.

Requirements

1. CIP for the accountholder will be performed at time of enrollment.

2. During the application process, we may be required to collect additional forms of identification from accountholders. We will notify them at least two times by mail. The communication plan and valid forms of identification we accept can be found on pages 5 and 6 of this document.

3. Accounts will remain open but will not allow any monetary transactions while we attempt identity verification.

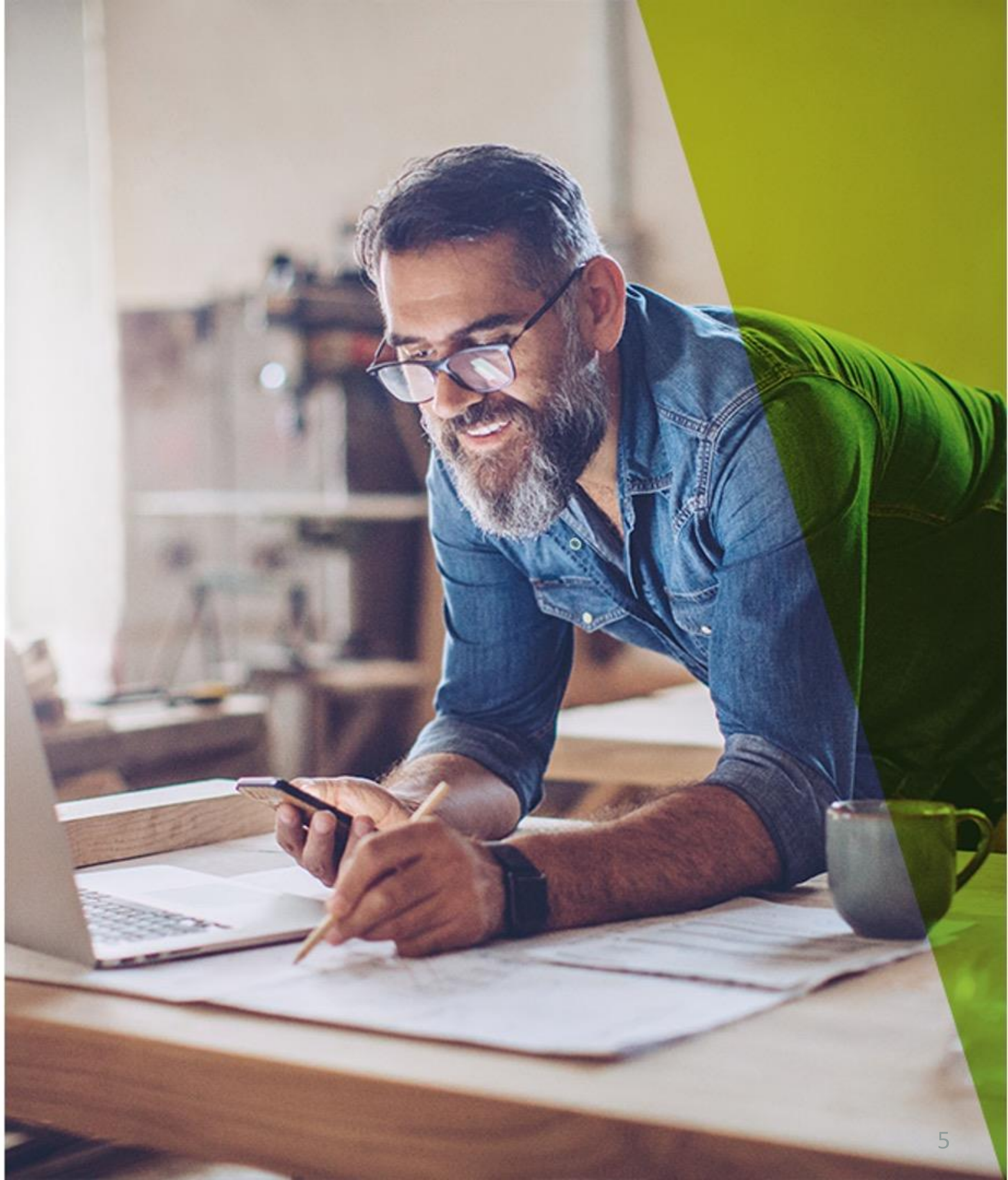
4. HSA Bank may close out the account if the accountholder is unable to supply the proper forms of identification within 90 days of the account setup. Should there be any funds in the account at time of closing, the funds will be returned to the accountholder and reported to the IRS as an Excess Contribution Removal. If the accountholder wishes to reestablish their account, they may be required to submit a new application through the appropriate enrollment method and provide identification at that time.

**Accountholders providing SSNs that are registered as deceased will be opened in a restricted status untilforms of identification are received and verified.*

CIP Follow-up Communications

HSA Bank will reach out to all accountholders who are required to submit additional forms of identification. The communication plan minimally consists of the letter frequency listed below and may include additional phone communications.

Timeframe after enrollment	Letter
4 days	X
3 weeks	X



Valid Forms of Identification

HSA Bank contacts any accountholder being required to submit additional forms of identification. Those accountholders must submit copies of the following within 90 days of account setup:

- Social Security Card
- U.S. government-issued photo ID, such as a driver's license, passport, or visa, or state issued ID card (Note: If the U.S. government-issued photo ID does not display a current address, a utility bill from within the last 3 months displaying the current address will also be needed.)

Identification can be submitted to HSA Bank by using one of the following methods:

Email: hsaforms@hsabank.com
Fax (Please copy these forms at 200% before faxing): 877-851-7041
Mail: HSA Bank, P.O. Box 939, Sheboygan, WI 53082

All documents must be legible.

Contact Information

For Assistance,
Contact Business Relations:

Monday through Friday, 7 a.m. to 7 p.m. CTE

Email
businessrelations@hsabank.com

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