

Video transcript: "Nacha Operating Rules Changes Coming in 2026" Video source: [https://youtu.be/LbWVVdgyOoE]

[Music begins to play as the Regions logo appears over a video of people working on their computers at their desks. The logo turns into a play button, and it looks like it's tapping the screen.]

VOICE-OVER: The National Automated Clearing House Association, the organization governing the ACH network, is updating the operating rules related to ACH payments to reduce and prevent the incidence of successful fraud attempts and improve the recovery of funds after fraud has occurred.

[A woman is on a computer with her phone and a cup of coffee next to her. A copy of the 2025 Nacha Operating Rules & Guidelines, The Guide to the Rules Governing the ACH Network, is on her desk, on her left. The video zooms in for a closer look.]

VOICE-OVER: Coming in 2026, Nacha is enlisting the assistance of all parties within the ACH network*, including:

- Originating Depository Financial Institutions, or ODFI
- Receiving Depository Financial Institutions, or RDFI
- Third-party senders, or TPS,
- Third-party service providers, or TPSP, and
- ACH clients/originators

[The words: "Coming in 2026, Nacha is enlisting the assistance of all parties within the ACH network*, including:" appear on screen over a video of tall skyscrapers. An asterisk with the words, "Consumers excluded," is at the bottom of the screen. Five green rectangles come onto the screen one by one and show the following words: Originating Depository Financial Institutions, or ODFI; Receiving Depository Financial Institutions, or RDFI; Third-party senders, or TPS; Third-party service providers, or TPSP and ACH clients or originators.]

VOICE-OVER: If you are an ACH client, the following rule changes apply to you

[The words: "If you are an ACH client, the following rule changes apply to you." appear at the top of the screen in a green section. We also see the same woman at the beginning of the video on her computer with the 2025 Nacha Operating Rules & Guidelines still on her desk.]

VOICE-OVER: Effective March 20, 2026, and June 22, 2026, all parties, including

ACH clients, are required to establish risk-based processes and procedures reasonably intended to identify entries suspected of being unauthorized or sent under false pretenses.

[The words, "Fraud monitoring by originators, TPSP, TPS and ODFI," appear at the top of the screen in a green section. The words, "Effective March 20, 2026 and June 22, 2026," appear at the bottom of the screen. The words fade away and five squares with five different icons appear representing processes and procedures.]

VOICE-OVER: These required processes and procedures do not require the screening of every ACH entry individually, and the screening is not required to be performed in advance of the processing of each entry.

[The icons shift away and three new icons appear in three green squares. The icons show a bank, with a green checkmark within a white circle, within a computer screen. The icons from the previous screen are floating around the three green squares.]

VOICE-OVER: However, the new rules clearly stipulate that failure to have some type of risk-based monitoring in place is unacceptable.

[The two outside green squares turn red with red exclamation points inside white triangles on top of each. The floating icons flow into the middle green square.]

VOICE-OVER: Effective March 20, 2026, ACH originators and third-party senders must include the word "**Payroll**" in the Company Entry Description field for all Prearranged Payment Deposits credit payroll batches.

[The words, "Standard company entry description for payroll," appear at the top of the screen in a green section and the words, "Effective March 20, 2026," appear at the bottom. You see a woman working at a table with another woman with notes in front of her. The green section comes into the middle of the screen to highlight the word, "PAYROLL," in the middle of a group of letters and numbers.]

VOICE-OVER: Effective March 20, 2026, the ACH client must include the word **"Purchase"** in the Company Entry Description field when the batch includes ecommerce purchases.

[The words, "Standard company entry description for purchase," appear at the top of the screen in a green section and the words, "Effective March 20, 2026," appear at the bottom of the screen. The green section comes into the middle of



the screen and highlights the word, "PURCHASE," in the middle of a group of letters and numbers.]

VOICE-OVER: According to Nacha, the updated rules promote enhanced transaction monitoring with the ODFI's detection of fraud from the point of origination through the point of receipt by the RDFI.

[A group of people are working on their laptops at a glass table. Five green squares appear with five different icons in each. A green checkmark inside a white circle appears above each green square. The labels for the five green squares are in this order: Originator, ODFI, ACH Operator, RDFI and Receiver.]

VOICE-OVER: Any entity found not compliant with these rule changes is subject to a rules violation, which could result in penalties, including significant fines.

[The first green square turns red with a red X in a white circle above it. The word, "Penalty," is below the red square. The other squares with icons remain green.]

VOICE-OVER: To learn more about the Nacha Operating Rules changes coming in 2026, we encourage you to obtain a copy of the Nacha Operating Rules and Guidelines, which can be purchased at nacha.org/store, or contact your local Payments Association at centerforpayments.org.

[The words, "To learn more about the Nacha Operating Rules changes coming in 2026, we encourage you to obtain a copy of the Nacha Operating Rules and Guidelines," appear on screen. The screen then dissolves and shows these words, "Purchase at nacha.org/store, or contact your local Payments Association at centerforpayments.org."]

[The Regions logo reappears, and the following disclosures appear on screen: This summary is provided for the convenience and education of our associates and clients but is not comprehensive or a substitute for the official Nacha Operating Rules. This summary should not be relied upon by Regions clients as legal or compliance advice and shall not be construed to replace the advice of independent legal counsel, compliance professionals, or other professional advisors as to the subject matter of this summary. All ACH clients are bound by the Nacha Rules and are encouraged to obtain a copy at nacha.org/store or through their local payments' association at centerforpayments.org.

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