

FIS REGULATORY ADVISORY SERVICES POLICY MANUAL



**FIS Regulatory Advisory Services
2001 Summit Park Drive
Maitland, FL 32810**

(800) 547-2462

Revisions 2004, 2005, 2006, 2007, 2008, 2009, 2010

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Policy Manual Introduction

We are frequently asked if we can provide a list of required policies that all regulated financial institutions need. The answer unfortunately is no! While some laws or regulations (the Bank Secrecy Act, for example) specifically require policies, most do not. Whether or not your institution needs a policy covering a particular area depends on a variety of factors such as the types of products and services offered, and the volume of activity handled. Unfortunately, examiners often request policies when things go wrong and the reason seems to be a lack of clear guidance and/or direction from the Institution's Board of Directors. Sound policy is supposed to provide this guidance.

Over the years we have crafted model policies for a variety of bankers who have, for one reason or another needed them. Some have been created because a law or its implementing regulation mandated that institutions have such a policy. Others were created because although no law or statute mandated the policy, regulators had come to expect all well managed institutions to have one. Still others were crafted in response to specific needs of specific institutions, usually in response to an examiner's criticism.

The policies in this manual are intended to be used as a starting point for institutions wishing to create policies specific to the needs of their institution. Please feel free to modify or change any of these model policies to fit the specific needs and structure of your institution. In creating model policies, we generally follow the "kiss" principle of policy writing (keep it simple stupid). Draft policies tend therefore to provide guidance as to the principals and behaviors that are required as a policy of the institution without going into a great deal of specifics. That is what procedure manuals are for. This document is NOT intended to be a detailed procedure manual.



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