

5. Monitoring & Reconciliation

- Review ACH transactions **daily**
- Reconcile bank accounts monthly
- Investigate any unusual or unauthorized activity immediately

6. Employee Awareness

- Train employees on fraud risks (phishing, BEC, social engineering)
 - Require prompt reporting of suspicious activity
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Incident Response

If fraud is suspected:

1. Notify the bank immediately
 2. Attempt to stop or recall the transaction
 3. Disable compromised access
 4. Notify management and document the incident
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Enforcement & Review

- Violations may result in disciplinary action
- Policy reviewed annually and updated as needed