

Exhibit A



FUNDS AVAILABILITY POLICY DISCLOSURE

This disclosure contains information about your ability to withdraw noncash deposits (mainly checks) deposited to your accounts and applies to all deposit accounts.

Ability to Withdraw Funds - Our policy is to make funds from your deposits available to you on the first business day after the day we receive your deposit. Electronic direct deposits will be available on the same business day we receive the deposit. Once the funds are available, you can withdraw them in cash and/or we will use the funds to pay checks you have written.

For determining the availability of your deposits, every day is a business day except Saturdays, Sundays, federal and local holidays. If you make a deposit before closing on a business day that we are open, we will consider that day to be the day of your deposit. However, if you make a deposit after closing or on a day we are not open, we will consider that the deposit was made on the next business day we are open. If you make a deposit at a bank owned ATM after 8:00 AM Chamorro Standard Time (ChST) or on a day we are not open, we will consider that the deposit was made on the next business day we are open.

Reservation of Right to Hold - In some cases, we will not make all of the funds that you deposit by check available to you on the first business day after the day of your deposit. Depending on the type of check that you deposit, funds may not be available until the **third (3rd) day after the day of your deposit**. However, the first \$225.00 of your deposit will be available on the first business day after the day of your deposit. If we are not going to make all of the funds from your deposit available on the first business day, we will notify you at the time you make your deposit. We will also tell you when the funds will be available. If your deposit is not made directly to one of our employees, or if we decide to take this action after you have left the premises, we will mail you the notice by the business day after we receive your deposit.

If you need the funds from a deposit right away, you should ask us when the funds will be available.

Longer Delays May Apply - We may delay your ability to withdraw funds deposited by check into your account and add an additional number of days for these reasons:

- You deposit checks totaling more than \$5,525 on any one day.
- You redeposit a check that has been returned unpaid.
- You have overdrawn your account repeatedly in the last six months.
- We believe a check you deposit will not be paid.
- There is an emergency, such as a failure of communication or computer equipment.

We will notify you if we delay your ability to withdraw funds for any of these reasons, and we will tell you when the funds will be available.

Hold On Other Funds - If we cash a check for you that is drawn on another financial institution, we may withhold the availability of a corresponding amount of funds that are already in your account. Those funds will be available at the time funds from the check we cashed would have been available if you had deposited it. If we accept for deposit a check drawn from another financial institution, we may make funds from the deposit available for withdrawal immediately but delay your availability to withdraw a corresponding amount of funds that you have on deposit in another account with us. The funds in the other account would then not be available for withdrawal until the time periods that are described elsewhere in this disclosure for the type of check that you deposited.

Your Responsibility for All Deposits - Even after we have made funds available to you, and you have withdrawn the funds, you are still responsible for checks you deposit that are returned to us unpaid and for any other problems involving your deposit.