**Monitoring of Websites Procedure – Marketplace Lending Platform Partnership**

# General Procedure Statement:

iCreditWorks (“iCW”) credit products offered through its strategic marketplace lending platform partners (“MPL”) are issued pursuant to agreements with ICW, pursuant to which ICW originates such credit as the lender of record in accordance with its credit criteria. In connection with these credit products, ICW’s MPL partners process all applications for credit, and services the accounts, on an ongoing basis, on behalf of and with direct oversight by ICW. ICW has approved this procedure, and ICW’s Vice President of MPL Compliance (“ICW MPL Compliance Officer”) or his/her designee will be responsible for overseeing this procedure on behalf of the Bank.

# Purpose:

The purpose of this document is to outline the ongoing review of our MPLs’ websites for factually or legally questionable information that could lead to consumer harm or a regulatory violation.

# Procedure:

The ICW MPL Compliance Group (“ICW MPL Compliance”) will ensure every active MPL’s website is reviewed monthly. This review is not meant to take the place of an external auditor’s review of regulatory disclosures (*i.e.* Review of Truth in Lending Act advertisement disclosures as stated in 12 CFR 1026.24, etc.) or review of marketing website for compliance with applicable regulations.

**Stage 1** – ICW MPL Compliance performs review of the MPLs’ website(s). The review will include the following:

* Is there any information that is factually inaccurate? This includes, but is not limited to:
  + Rates, payment terms, and fees;
  + Misleading or unsubstantiated claims, including pricing, rates, or promises;
  + Free offers; and/or
  + Unclear verbiage.
* Is there a promotional rate offered that was not disclosed to/approved by ICW?
  + If yes, did ICW receive confirmation that the MPL’s legal and/or compliance staff approved the promotion?
* When using terms such as “pre-approved,” “guaranteed,” or “fixed rates,” does the MPL clearly disclose any limitations, conditions, or restrictions on the offer?
* Does the website have instructions on how consumers can contact the MPL’s customer service center regarding service problems, complaints, suspected misuse of accounts, etc.?

**Stage 2** – If issues are noted during the review, ICW MPL Compliance will take the following steps:

* Memorialize the issue(s) detected for communication to the MPLs;
* Transmit the issues to the MPL Underwriting Team for distribution to the MPLs;
* Provide the MPLs with one week in which to provide a resolution plan;
* Track the progress of each action item through resolution; and
* If not resolved within one month, the ICW MPL Compliance Officer may escalate the matter to ICW’s senior management. ICW MPL Compliance Officer has discretion to make exceptions to this escalation process on a case-by-case basis.

**Stage 3** – The ICW MPL Compliance Officer or his/her delegate will review weekly reports produced by an automatic website change detection program (G2 – a third-party provider), and take follow up action with the MPL as required. The automatic website change detection program detects and reports any changes made to an MPL’s website on a weekly basis.

# Reporting

To ensure board oversight, the ICW MPL Compliance Officer will report the monitoring results at the quarterly Audit Committee meeting.

# Record Retention:

The ICW MPL Compliance Group maintains documentation of the monitoring performed the issues noted related to the review.