**Online Advertising Oversight Procedure – Marketplace Lending Platform Partners**

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 MPLs 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.

Overview:

The importance of maintaining an effective process for ensuring compliance with consumer protection laws and regulations, and for managing compliance risk, is fundamental to the business and operational philosophy of ICW. Compliance and compliance risk management are expected to be part of the day-to- day responsibilities of the Bank’s management and colleagues.

By analyzing the online advertising activities of its partners, a financial institution can use the findings to regularly measure its compliance risk, calibrate its controls, and provide a compliance assessment. To this end, the Bank has developed an oversight procedure to address, track, monitor, and report online advertising activities relative to MPLs.

This procedure is intended to outline the monthly review of the MPLs’ online advertising presence for factually or legally questionable material that could lead to consumer harm or regulatory violation.

Method:

ICW requires its MPLs to submit all marketing material to for review and approval prior to publication or dissemination. ICW has contracted the law firm of Manatt, Phelps & Phillips, LLP to review and comment on said material in the context of regulatory requirements.

The MPL Compliance Grou (“ICW MPL Compliance”) maintains a database of all marketing material submitted by MPLs. This database also contains the corresponding comments provided by Manatt, Phelps & Phillips, LLP.

On a monthly basis, ICW MPL Compliance performs a review of each MPL’s online advertising materials using an internet search solution obtained by ICW through a third-party service vendor. The reviewer conducts a search for all online advertising including, but not limited to, display advertisements, mobile site advertisements, videos, and in-app advertising, using the legal name and the “doing business as” (“DBA”) name of every MPL.

The reviewer compares the search results to ICW’s database of advertising material with the objective of determining:

Whether all the MPL’s advertisements have been approved by ICW or its counsel; and

Whether the advertisements have been amended after such approval.

If the search detects unapproved advertisements or amendments, 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 resolve the issues;

Track the progress on each identified issue through to its resolution; and

Maintain a record of all material submitted by the MPLs in response to the action items.

If any concern remains unresolved for longer than 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.

Reporting:

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

Record Retention:

ICW MPL Compliance will maintain documentation of all issues and supporting documentation provided by the MPLs related to their online advertising activity.