Online Advertising Oversight Procedure – Marketplace Lending Platform Partners

# General Procedure Statement:

2029 w policy company (“iCW”) credit products offered through its strategic marketplace lending platform partners (“MPL”) are issued pursuant to agreements with 2029 W POLICY COMPANY pursuant to which 2029 W POLICY COMPANY originates such credit as the lender of record in accordance with its credit criteria. In connection with these credit products, 2029 W POLICY COMPANY’s MPLs process all applications for credit, and services the accounts, on an ongoing basis, on behalf of and with direct oversight by 2029 W POLICY COMPANY. 2029 W POLICY COMPANY has approved this procedure, and 2029 W POLICY COMPANY’s Vice President of MPL Compliance (“2029 W POLICY COMPANY 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 2029 W POLICY COMPANY 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:

2029 W POLICY COMPANY requires its MPLs to submit all marketing material to for review and approval prior to publication or dissemination. 2029 W POLICY COMPANY 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 2029 W POLICY COMPANY 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, 2029 W POLICY COMPANY MPL Compliance performs a review of each MPL’s online advertising materials using an internet search solution obtained by 2029 W POLICY COMPANY 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 2029 w policy company database of advertising material with the objective of determining:

1. Whether all the MPL’s advertisements have been approved by 2029 W POLICY COMPANY or its counsel; and
2. Whether the advertisements have been amended after such approval.

If the search detects unapproved advertisements or amendments, 2029 W POLICY COMPANY MPL Compliance will take the following steps:

1. Memorialize the issue(s) detected for communication to the MPLs;
2. Transmit the issues to the MPL Underwriting Team for distribution to the MPLs;
3. Provide the MPLs with one week in which to resolve the issues;
4. Track the progress on each identified issue through to its resolution; and
5. Maintain a record of all material submitted by the MPLs in response to the action items.
6. If any concern remains unresolved for longer than one month, the 2029 W POLICY COMPANY MPL Compliance Officer may escalate the matter to 2029 W POLICY COMPANY’s senior management. 2029 W POLICY COMPANY MPL Compliance Officer has discretion to make exceptions to this escalation process on a case-by-case basis.

# Reporting:

To ensure board oversight, the 2029 W POLICY COMPANY MPL Compliance Officer will report the monitoring results at the quarterly Audit Committee meeting.

# Record Retention:

2029 W POLICY COMPANY MPL Compliance will maintain documentation of all issues and supporting documentation provided by the MPLs related to their online advertising activity.