



Document ID: CP-2025-V2

Effective Date: January 1, 2025

Classification: Internal / Confidential

1. MISSION & PURPOSE

The objective of this policy is to establish standardized, automated underwriting guidelines that ensure fair, transparent, and compliant lending practices. This policy utilizes a data-driven approach to minimize credit risk while maximizing high-quality loan volume for Global Fintech Solutions.

2. PRIMARY ELIGIBILITY THRESHOLDS (HARD GATES)

An application must pass **all** the following "Hard Gate" criteria to proceed to the Risk Tiering stage. Failure of any single item results in an immediate **Denial**.

- **FICO Score:** Minimum **650**.
- **Monthly Income:** Minimum **\$3,000** (Gross).
- **Debt-to-Income (DTI):** Maximum **40%**.
- **Identification:** Valid Government-issued ID required; must match Credit Bureau records.

3. ADVANCED RISK & COMPLIANCE CONSTRAINTS

In addition to primary thresholds, the following high-precision rules apply to mitigate "credit hunger" and prevent over-leveraging:

Metric	Required Value	Policy Rationale
Loan-to-Income (LTI)	< 75%	Ensures loan amount is proportionate to annual earnings.
Personal Loan Inquiries	0 (Last 120 Days)	Filters out "Credit Hungry" behavior and immediate risk.
Foreclosures / Repos	0 (Last 24 Months)	Indicates long-term asset stability and repayment reliability.
New Auto / Mortgages	0 (Last 24 Months)	Prevents "Debt Stacking" where multiple large loans are taken at once.
Credit Card Utilization	< 80%	Measures management of existing revolving credit lines.

4. AUTOMATED RISK TIERING

Applicants who pass all Hard Gates are categorized for pricing as follows:

- **Tier 1 (Prime):** FICO 750+, DTI < 45%, LTI < 50%.
- **Tier 2 (Standard):** FICO 700-749, DTI < 40%, LTI < 65%.
- **Tier 3 (Near-Prime):** FICO 650-699, DTI < 35%, LTI < 75%.

5. AUTOMATIC DENIAL TRIGGERS

Regardless of other strengths, the following items result in a **Hard Decline**:

1. Any bankruptcy filing within the last 7 years.
2. Any accounts currently 30+ days past due.
3. Failure to verify identity via Government ID.

6. COMPLIANCE & FAIR LENDING

Under the **Equal Credit Opportunity Act (ECOA)** and the **Fair Credit Reporting Act (FCRA)**, all denials must provide the applicant with an "Adverse Action Notice" detailing the specific reason for rejection (e.g., "Personal Loan Inquiry Count > 0").