

Thrift Investment Corporation Fair Lending Policy

Thrift Investment Corporation, herein after TIC, is committed to provide loan finance services to applicants and borrowers on an equal basis. TIC does not discriminate against any applicant or discourage anyone on a prohibited basis from submitting an application. TIC's policy is to treat all applicants and borrowers consistently and in compliance with Fair Lending Laws throughout the loan process. To assure that our employees have a clear and unequivocal statement of our commitment to a non-discriminatory method of doing business, we have adopted the following Fair Lending Policy. Employees must be thoroughly familiar with this policy and follow it.

TIC employees will offer assistance and services in a fair and consistent manner during the performance of their jobs to all potential applicants and borrowers without regard to race, color, religion, national origin, sex, marital status, disability, familial status, age (provided the individual has legal capacity to enter into a binding contract), receipt of public assistance or the exercise of legal rights under the federal Consumer Credit Protection Act (15 U.S.C. Stat. 1601 et seq.) TIC is committed to informing its employees of and implementing policies that ensure compliance with all fair lending laws, including New York Executive Law Stat 296-a. New York Executive Law makes it unlawful for any creditor to discriminate on the basis of race, creed, color, national origin, age, sex, marital status, disability, sexual orientation, or military status; to use any form of application for credit or use or make any record or inquiry which expresses, directly or indirectly, any limitation, specification, or discrimination as to a prohibited basis; to make any inquiry of an applicant concerning his or her capacity to reproduce or his or her use of advocacy of any form of birth control or family planning; to refuse to consider sources of an applicant's income or to subject an applicant's income to discounting, in whole or part, because of a prohibited basis of childbearing potential; or to discriminate against a married person because such person neither uses or is known by the surname of his or her spouse.

Structural Organization

TIC's commitment to fair lending is reflected in its belief in the shared responsibility for compliance with fair lending laws at every level of the organization.

The Senior Management are responsible for approving, adopting, and implementing the Fair Lending Plan.

TIC's Management is responsible for ensuring that TIC's business practices comply with its Fair Lending Plan. As such, Management must communicate TIC's fair lending policies to the applicable business unit management, allocate, on an ongoing basis, sufficient resources to ensure successful implementation of this Plan, obtain input and guidance from the Senior Management on significant business decisions that have potential fair lending impact, and monitor results, recommending corrective action where necessary.

The Compliance Department, led by the President of the Corporation, implements the policies outlined in this plan as follows: Monitor implementation of and adherence to the fair lending

policies and procedures, review and address fair lending complaints, monitor as necessary TIC's loan application and underwriting process, as well as pricing policies, review on a regular basis the Fair Lending Plan to determine that it still accurately reflects the procedures followed by TIC and conforms to state and federal laws, maintain updated training manuals reflecting recent changes in the law, and provide semi-annually updates on fair lending issues to all TIC employees involved in loan origination or service processing.

Training & Remediation

TIC conducts training for all new and current employees. New employees will receive a copy of this policy during that training. Training includes correctly and adequately describing prohibited bases under the Equal Credit Opportunity Act, Regulation B, and applicable state laws. All employees will be provided updates on fair lending issues on a semi-annual basis.

If any employee is determined to violate this policy, immediate corrective action will be taken. The employee will be re-trained. If the conduct continues, more severe sanctions will be put in place, including and up to termination.

Any complaints by applicants will be immediately reviewed by the President of the Corporation to determine their accuracy.

Marketing

Executive Management reviews and must approve, prior to distribution, all marketing strategies directed to any protected class applicants or minority communities to ensure compliance with fair lending laws. Periodic review of existing marketing is also conducted.

Underwriting and Pricing

Underwriting guidelines are established through written policy and procedure in order to promote and ensure consistency throughout all classes of applicants. These guidelines address all aspects of the underwriting process, including collateral standards, credit income, source of funds, debt ratios, income documentation and other factors relevant to the underwriting decision.

TIC will offer borrowers the best available products for which the borrower would qualify based on his/her creditworthiness, ability to document income and combined loan to value.

Loan applications that are rejected by TIC are referred to other credit managers within the company for a second review prior to formal denial of credit. Such review will be overseen by the President or Vice President of the Corporation.

If there is any question, additional review will be conducted by the President of the Corporation.

Loan Servicing, Refinancing, Collection and Foreclosure

This plan's principles of fair lending policies apply throughout the loan process. TIC is committed to implementing policies, procedures, employee training, and management oversight to ensure equitable treatment of all debtors. TIC's policies include responding to consumer inquiries, concerns, and complaints in a timely, fair and consistent manner.

Third Party Originations

TIC's commitment to complying with fair lending laws extends to its relationships with third party originators (Loan brokers and correspondents). TIC requires all companies doing business with TIC to comply to all applicable laws. All companies doing business with TIC will be required to certify that they have received a copy of TIC's Fair Lending Plan.

TIC is in accordance with the Federal Equal Credit Opportunity Act. TIC will not tolerate discrimination against any borrower or potential borrower.

New updates will be forwarded as necessary.

A copy of this plan will be posted on the company website.

Monitoring

TIC implements monitoring processes that review the lending practices of the institution as a whole as well as its various departments, and individuals within the departments. TIC's monitoring program focuses on detecting deficiencies and ensuring that TIC's monitoring program focuses on detecting deficiencies and ensuring that TIC's personnel understand their duties and responsibilities under the plan and carrying them out. The President of the Corporation performs regular audits of loan files to monitor data integrity for funded and non-funded loans.

Please Fax to: (732)738-1905

Or

Mail to: Thrift Investment Corporation

720 King Georges Road #211

P.O Box 538

Fords, New Jersey 08863

Receipt of TIC Fair Lending Policy

I hereby acknowledge receipt of TIC's Fair Lending Policy. I have read the policy and understand my responsibility to comply with all federal and state fair lending laws, including New York Executive Law 296-a. I agree to comply with such laws as a condition of my employment/contract with TIC.

Date: _____

Dealer Name: