

Fair Lending Overview

Introduction

Fair Lending is the unbiased treatment of all customers. Fair Lending laws ensure that financial institutions provide fair and uniform services and credit decisions based only on a consumer's credit history.

Charlotte County Habitat for Humanity Inc., fair treatment of our current and potential customers is an integral part of our overall commitment to maintaining the highest standards of corporate responsibility. This extends to every aspect of a credit transaction, including but not limited to, advertisement, pre-application inquiries, loan disbursement, and ongoing service of the loan.

Charlotte County Habitat for Humanity Inc., Fair Lending Statement

Charlotte County Habitat for Humanity Inc. is committed to treating all individuals fairly and equitably in the conduct of its lending businesses in all jurisdictions where it conducts business. This commitment is part of our fundamental mission of providing quality financial services to existing and prospective customers in accordance with all applicable laws. In the United States, this principle is embodied in fair lending laws such as the Equal Credit Opportunity Act, the Fair Housing Act and applicable state laws. These laws require the equitable treatment of all credit applicants without regard to race, sex, sexual orientation, color, national origin, religion, age, marital status, disability, familial status, the fact that all or part of the applicant's income derives from public assistance programs or to the fact that the applicant has in good faith exercised any right under the Consumer Credit Protection Act. Denying any person equal access to basic economic opportunities, such as home ownership or credit, is morally repugnant, has no place in our company, and will not be tolerated.

Only through the efforts of all of us at Charlotte County habitat for Humanity, Inc. can we ensure that every applicant for credit receives fair and equitable treatment and that we have helped each member of the communities Charlotte County habitat for Humanity, Inc. serves reach his or her fullest potential.

Fair Lending Laws

Equal Credit Opportunity Act

The ECOA (Equal Opportunity Credit Act) affects every phase of the lending process and prohibits discrimination on the basis of:

- Age
- Color
- Sex
- Marital status

- National origin
- Race
- Religion
- Exercising rights under the Consumer Credit Protection Act
- Receipt of public assistance

The provisions of the ECOA make it illegal to discourage an applicant, decline a request for, or terminate a loan based on any of the factors listed above.

Fair Housing Act (FHA)

This law prohibits discrimination in the sale, rental, and financing of property based on:

- Race or Color
- National Origin
- Religion
- Sexual orientation, gender identity and marital status are also consider protected groups for housing under rule adopted by the Department of Housing and Urban Development (HUD)
- Familial status (for example, the presence of children in the household)
- Disability

Americans With Disabilities Act (ADA)

The ADA (Americans with Disabilities Act) prohibits discrimination against qualified individuals with disabilities. It assures that protected individuals have equal access to goods and services offered by private businesses.

Charlotte County habitat for Humanity, Inc. prohibits discrimination on the basis of any of the protected factors listed above in all types of credit transactions.

Civil Rights Act of 1866

This law guarantees equal rights to purchase real estate and personal property to all people, regardless of race.

Home Mortgage Disclosure Act (HMDA)

The HMDA (Home Mortgage Disclosure Act) requires financial institutions to report information about the loans they originate or purchase. They must publish the information annually to allow public and federal

regulators to determine the company's responsiveness to the community's needs. The type of information they must publish includes:

- Income
- Race
- Ethnicity
- Gender
- Geographic area

Fair Lending Regulatory and Enforcement Agencies

Regulatory agencies have a broad range of powers in evaluating the compliance of lenders.

The fair lending regulatory agencies include the:

- CFPB (Consumer Financial Protection Bureau)
- OCC (Office of the Controller of Currency)
- FRB (Federal Reserve Board)
- FDIC (Federal Deposit Insurance Corporation)
- FTC (Federal Trade Commission)
- Various State Banking Departments

Enforcement agencies investigate alleged Fair Lending violations.

The Fair Lending enforcement agencies include the:

- DOJ (Department of Justice)
- HUD (Department of Housing and Urban Development)