

Fair, Equitable and Responsible Lending Policy Statement

Residential Bancorp et al, (the Company or Company) is committed to the guiding principles of fair, equitable and responsible lending, and that all creditworthy customers are treated fairly, equally and have nondiscriminatory access to credit. The Company believes the granting of credit should be made without regard to any of the following prohibited factors: race, color, ethnicity, religion, gender, marital or family status, sexual orientation, age, or the fact the applicant receives public assistance or may have exercised rights under the Federal Consumer Credit Protection Act.

It is the Company's policy to prohibit unlawful discrimination through either disparate treatment, or disparate impact. Disparate treatment refers to applicants being treated differently based on one of the prohibited factors listed above, while disparate impact happens when a lending practice is applied to all applicants equally but has an unintended discriminatory result.

The Company does not tolerate discrimination in its lending or business practices by any of its officers, employees, or agents in serving our creditworthy customers. As a part of the Company's efforts to protect its creditworthy customers, it regularly monitors its products, services, policies and practices.

The Company's residential mortgage lending activity is evaluated to ensure adherence to the standards set forth by its Fair, Equitable and Responsible Lending Policy and its Statement of Policy. Additionally, the Company strives to comply with all other governing fair lending regulations, applicable state laws, and its regulator, the Consumer Financial Protection Bureau.

The Company provides potential creditworthy customers an equal opportunity to apply for each of the available mortgage products it offers. The Company does not tolerate lending activities by its employees or third parties that are deemed harmful, unfair or deceptive to its existing or potential customers.

The Company also recognizes that affirmative steps must be taken to ensure that its fair, equitable and responsible lending principles are applied continuously and consistently through all aspects of its Sales and Credit Operation; inclusive of its marketing initiatives, advertising, pre-application (discussions and inquires), application taking (gathering of creditworthy customer information), underwriting and relationships with third parties involved in the credit process. On an on-going basis, the Company makes changes to its operational practices and is continually evaluating ways to more effectively meet our commitment to fair, equitable and responsible lending.

The Company's Fair, Equitable and Responsible Lending Policy Statement is located on its website and provided to all employees.