



## Fair Leasing Policy

Auto Trakk, LLC ("Auto Trakk") is committed to maintaining a culture of fair leasing throughout the organization, and ensuring this culture is communicated to the motor vehicle dealers with which it receives credit applications and/or purchases Vehicle Lease Contracts ("VLC"). In this regard, Auto Trakk has developed a Fair Leasing Policy which articulates Auto Trakk's commitment to comply with the letter and spirit of fair lending laws and regulations, including but not limited to the Equal Credit Opportunity Act and Regulation B.

Auto Trakk does not discriminate against any applicant or lessee with respect to any aspect of a lease transaction on the basis of the following:

- Sex
- Marital Status
- Race
- Color
- Religion
- National Origin
- Age (provided the applicant/lessee has the legal capacity to enter into a binding contract)
- All or part of the applicant's income is derived from a public assistance program
- Applicant exercises rights under the Consumer Protection Act (15 U.S.C. §§ 1601 et seq.)
- Sexual Orientation
- Military Status
- Disability

This prohibition applies to any aspect of a lease transaction, which means any stage or element of the lease process, including application, credit evaluation, credit decision, credit terms, servicing, collection, repossession and payoff.

All Auto Trakk personnel, as well as motor vehicle dealers from which Auto Trakk may receive lease applications and/or purchase VLC's, shall treat all consumers fairly and consistently throughout the entire credit process, without regard to any prohibited basis or other characteristic prohibited by law. This means Auto Trakk personnel and motor vehicle dealers from which Auto Trakk receives applications and/or purchases VLC's may not do any of the following on a prohibited basis:

- Refuse to deal with individuals inquiring about credit.
- Discourage inquiries or applicants by delays, discourtesy or other means.
- Provide different, incomplete, or misleading information about the availability of credit, application requirements, and processing and approval standards or procedures (including selectively informing applicants about certain credit options while failing to inform them of alternatives).
- Encourage or more vigorously assist only certain inquirers or applicants.
- Use different procedures or standards to evaluate applications.

Collectively, the foregoing shall be referred to as Auto Trakk's Fair Leasing Policy.