

COMPLAINTS AND INQUIRIES POLICY

PURPOSE

Company provides financial services to consumers, and therefore relies on the goodwill of its customers to remain in business. Company earns that goodwill by ensuring that it provides the quality of service that its customers demand. Therefore, Company strives to be a market leader in its industry with regard to customer service. In order to be a leader, Company will address and resolve all Complaints and Inquiries in a responsive and timely manner.

SCOPE

Company's Compliance Management System will ensure the accurate and responsive handling of consumer and customer Complaints and Inquiries. Intelligence gathered from Complaints and Inquiries will be organized, evaluated, and retained as part of the Complaints Management System.

POLICY

It is the policy of Company to address and resolve all Complaints and Inquiries in a responsive and timely manner. The Chief Legal and Compliance Officer is responsible for the Complaints Management System. The Compliance Department will work with the Office of the President ("Presidential") to effectively manage the Complaints and Inquiries process.

COMPLAINTS AND INQUIRIES

Complaints

A **Complaint** is a consumer or customer oral or written communication that expresses dissatisfaction with a person, process, policy, product or service provided by Company. Examples of a Complaint includes, but is not limited to, the following:

- Threat of or escalation to a Federal regulatory agency such as the Consumer Financial Protection Bureau ("CFPB"), Office of the Comptroller of the Currency ("OCC"), Federal Deposit Insurance Corporation ("FDIC"), Federal Trade Commission ("FTC"), Federal Communications Commission ("FCC"), Department of Justice ("DOJ"), Department of Defense ("DOD"), etc.
- Threat of or escalation to a state regulatory agency such as the State Attorney General, Department of Financial Services, Department of Consumer Protection, etc.
- Threat of or escalation to the Better Business Bureau ("BBB").
- Threat of or escalation to an attorney.
- Threat to write negative comments or reviews on Social Media.
- A consumer or customer states they have been unfairly treated, deceived or misled.
- A consumer or customer states they have been discriminated against.

Inquiries

An **Inquiry** is a consumer or customer oral or written communication that requests information or action regarding a person, process, product or service provided by Company.

OFFICE OF THE PRESIDENT

It shall be the responsibility of all Company employees to ensure that all Complaints and Inquiries received are immediately sent to Presidential for review and response. Presidential will research the allegations of all Complaints and Inquiries and respond in a timely manner.

COMPLIANCE REVIEW

The Compliance Department will review all Complaint and Inquiry responses before they are sent in order to ensure accuracy and timeliness of the response. Compliance is responsible for tracking and reporting all Complaint and Inquiry trends and potential compliance issues.

TRACKING SYSTEM

Company will implement a Complaint and Inquiry Tracking System. The Tracking System will be utilized to store all Complaints and Inquiries, trends, the channels in which they are received, and areas that may need improvement for training purposes.

COMPLAINT AND INQUIRY CODES

Complaint and Inquiry Codes will be created in order to track and report different metrics. Every Complaint or Inquiry will have a Code or Codes assigned. The Code(s) will be assigned once a review of the Complaint or Inquiry is completed by Presidential.

REPORTING

Compliance will generate various reports regarding Complaints and Inquiries. The reports will be provided to the Complaints Review Committee for review and analysis on a quarterly basis. There will also be daily Complaints and Inquiries reports generated as delineated below:

- **Complaints and Inquiries Filed – Leads Report**
On a daily basis a Complaints and Inquiries Report regarding Leads will automatically be generated and sent to Presidential for review. The Report will show any new Complaints and Inquiries from Leads that were received and entered into the Complaints and Inquiries tracking system.
- **Complaints and Inquiries Filed – Accounts Report**
On a daily basis a Complaints and Inquiries Report regarding loan Accounts will automatically be generated and sent to Presidential for review. The Report will show any

new Complaints and Inquiries from loan Accounts that were received and entered into the Complaints and Inquiries tracking system.

COMPLAINTS REVIEW COMMITTEE

A Complaints Review Committee, chaired by the Chief Legal and Compliance Officer, will be established and meet on a quarterly basis. At the quarterly Complaint Review meeting, members of the Committee will review Complaint or Inquiry reports for issues or trends of concern. The Committee will determine if any corrective action needs to be implemented.

COMPLAINTS REPORT TO THE BOARD AUDIT COMMITTEE

The Compliance Department will provide the Audit Committee for the Board of Directors with a Complaints Report on a quarterly basis.

TRAINING

The Compliance Department will provide ongoing training to Presidential regarding reviewing and responding to Complaints and Inquiries. The Compliance Department will also provide training to other applicable Departments as needed, but no less than annually.