

The Brand Banking Company dba BrandAuto Finance  
Dealer Agreement Compliance Addendum

The Fair Credit Reporting Act and the Equal Credit Opportunity act apply to all parties who in the ordinary course of business regularly participate in the decision of whether or not to extend credit. In addition, the Customer Identification requirements of the USA PATRIOT Act apply when extending credit.

The Fair Credit Reporting Act was enacted to prevent applications for credit from being damaged because of inaccurate or arbitrary information in their credit files and to regulate the use of consumer credit reports. The Equal Credit Opportunity Act prohibits discrimination in the granting of credit and further states that the applicants for credit shall not be discriminated against because of race, color, religion, national origin, sex, marital status, or age (provided that the applicant has the capacity to enter into a binding contract). The fact that all or part of the applicant's income derives from any public assistance program, or the fact that the applicant has in good faith exercised any right under the Consumer Credit Protection Act. In addition, the Act contains rules concerning the requiring of co-makers or co-applicants on loans. The USA PATRIOT Act was enacted in response to terrorism and increased need to identify the borrower.

In order that you might have an understanding of your requirements and our procedures under the applicable legislation, we are outlining the requirements and procedures below:

1. Dealer should obtain a completed BrandAuto Finance or other approved credit application on each customer. The applicant will be required to sign the appropriate space to verify its accuracy and to authorize BrandAuto Finance to investigate the applicant's credit background.
2. Dealer must advise each applicant that BrandAuto Finance is the lender to whom the credit application will be sent. This is particularly important when a generic application or an application of another lender is used.
3. BrandAuto Finance will send an Adverse Action including the Fair Credit Reporting Act and Equal Credit Opportunity Act notifications to each applicant whose request cannot be approved.
4. Dealer must take all reasonable steps including obtaining complete borrower name, physical address, social security number and date of birth to determine and authenticate the borrowers are whom they claim to be and have a valid driver's license.
5. Dealer must comply with the requirements of ECOA and any corresponding regulations, policy statements, and guidance promulgated or announced by federal agencies, including the Consumer Financial Protection Bureau and the Federal Reserve. Such compliance includes, but is not limited to, (1) maintaining formal policies to ensure that any "dealer reserves" or "dealer markups" (i.e., the difference between the Annual Percentage Rate and Buy Rate) are negotiated with Buyers using only good faith, competitive reasons and in a manner that does not discriminate against any protected class under ECOA; and (2) reviewing Dealer's entire portfolio of loans assigned to BrandAuto Finance to ensure that the negotiation of finance terms does not lead to disparate impact against a protected class under ECOA.

We will continue our policy of providing prompt and efficient credit service to you and will appreciate your assistance in implementing the provisions of the Fair Credit Reporting Act, the Equal Credit Opportunity Act and the USA PATRIOT Act.

Does your dealership charge a dealer document preparation fee on all vehicles sold? Yes \_\_\_\_\_ No \_\_\_\_\_

Should you have any questions regarding our procedures, we will be glad to discuss them in more detail with you. Thank you in advance for your cooperation.

-

BrandAuto Finance

Dealership\_\_\_\_\_

By:\_\_\_\_\_

(Legal Name) \_\_\_\_\_

Title:\_\_\_\_\_

By:\_\_\_\_\_

P.O. Box 1110  
Lawrenceville, GA 30046

Title:\_\_\_\_\_

Address:\_\_\_\_\_

City, State:\_\_\_\_\_

Zip Code:\_\_\_\_\_

Date:\_\_\_\_\_