

Our Commitment to Fair Lending

Member Home Loan (MHL) is committed to making loans to all applicants in a consistent, fair and reasonable basis, striving to conduct our business in an ethical manner with the utmost professionalism.

It is unlawful for MHL to discriminate on a prohibited basis in any aspect of credit transaction under the ECOA and for MHL to discriminate on a prohibited basis in a residential real estate related transaction for both the ECOA and the FHAct.

Our commitment is to provide the accessibility of credit to all creditworthy applicants with regard to the following fair lending regulations:

<p style="text-align: center;">Equal Credit Opportunity Act Reg. B (ECOA)</p>	<p>ECOA prohibits discrimination in any aspect of a credit transaction based on the following characteristics:</p> <ul style="list-style-type: none"> • Age (provided the applicant has the capacity to contract) • Race or color • Religion • National origin • Sex • Marital status • Applicant's receipt of income received from any public assistance program • Applicant's exercise, in good faith, or any rights under the Consumer Credit Protection Act <p>NOTE: ECOA covers all extensions of credit and certain technical requirements that are meant to help further the purpose of ECOA.</p>
<p style="text-align: center;">Fair Housing Act (FH Act)</p>	<p>The Fair Housing Act prohibits discrimination in all attributes of real estate related transactions including:</p> <ul style="list-style-type: none"> • Making loans to buy, build, repair or improve a dwelling • Purchasing real estate loans • Selling, brokering or appraising residential real estate • Selling or renting a dwelling <p>Discrimination based on:</p> <ul style="list-style-type: none"> • Race or color • National Origin • Religion • Sex • Familial status (Defined as children under the age of 18 living with a parent or legal custodian, pregnant women, and people securing custody of children under 18) • Handicap <p>In determining the:</p> <ul style="list-style-type: none"> • Amount • Interest rate • Duration • Other credit terms <p>NOTE: FHA is limited to residential real estate related transactions or a loan secured by residential real estate transactions and does not have technical requirements.</p>

Home Mortgage Disclosure Act (HMDA) Reg. C

<p>Home Mortgage Disclosure Act (HMDA)</p>	<p>HMDA is a disclosure law that requires mortgage lenders to compile and disclose information about applications for home purchase, refinance and home improvement loans. This reporting allows both the public and regulators to determine responsiveness to the home financing needs of communities in which business is conducted. The information reported includes income, race, sex, geographic area, pricing and other factors.</p>
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Prohibited Discrimination Factors

If a credit, pricing, or other decision is made on a prohibited basis, it is a violation of the fair lending laws and regulations. These are some examples of illegal discrimination recognized under the ECOA and FHAct:

<p>Examples of Prohibited Discrimination Factors</p>	<p>Failure to provide information or services or provide different information or services regarding any aspect of the lending process, including credit availability, application procedures, or lending standards.</p>
	<p>Discourage or selectively encourage applicants with respect to inquires about or application for credit</p>
	<p>Refuse to extend credit or use different standards in determining whether to extend credit</p>
	<p>Vary the terms of credit offered including the amount, interest rate, duration or type of loan.</p>
	<p>Use different standards to evaluate collateral</p>
	<p>Treat a borrower differently in servicing a loan or invoking default remedies</p>
<p>Examples of Prohibited Characteristics</p>	<p>Use different standards for pooling or packaging a loan in the secondary market.</p>
	<p>An applicant, prospective applicant or borrower</p>
	<p>A person associated with an applicant, prospective applicant or borrower</p>
	<p>The present or prospective occupants of either the property to be financed or the characteristics of neighborhood or other area where property to be financed is located.</p>
<p>Reasonable accommodations for a person with disabilities when necessary to afford the person an equal opportunity to apply for credit.</p>	

Prohibited Advertising

Nondiscriminatory Advertising	MHL must not:
	Engage in any form of advertising of real estate related loans which indicate there is discrimination on a prohibited basis.
	Advertisements must not contain any words, symbols, models, or other forms of communication that suggest a discriminatory preference or policy of exclusion
	Advertisements of real estate products must include a facsimile of the prescribed equal housing lender logo (for written advertisements) or prescribed language (for oral advertisements).

Types of Lending Discrimination

The courts have recognized three methods of proofing of lending discrimination under the ECOA and FHAct.

Disparate Treatment	
Overt	<p>There is overt evidence of discrimination when a lender:</p> <ul style="list-style-type: none"> • Openly discriminates on a prohibited basis. • When a lender expresses but does not act on a discriminatory preference <p>Example: Redlining</p>
Comparative evidence	<p>This type of disparate treatment occurs when a lender treats a credit applicant differently based on one of the prohibited basis. It does not require any showing that the treatment was motivated by prejudice or a conscious intention to discriminate against a person beyond the difference in treatment itself.</p> <p>Example: Steering</p>
Evidence	<p>When a lender applies a racially or otherwise neutral policy or practice disproportionately excluded or burdens certain persons on a prohibited basis, the policy or practice is described as having a “disparate impact”.</p> <p>Example: Income standard for credit applicants</p>

MHL's policy is to adhere to and promote compliance with all applicable state and federal laws and regulations. MHL ensures fair lending and equal access to credit, including but not limited to the ECOA and the FHAct.