# Equal Credit Opportunity Act (ECOA) Purpose

The ECOA (15 USC 1691), as implemented by Regulation B (12 CFR 1002), promotes the

availability of credit to all creditworthy applicants without regard to the basis listed below. The regulation imposes certain requirements on creditors to notify applicants of action taken on their applications and to collect information about an applicant’s race, sex, marital status, and age in connection with applications. Regulation B does not, however, prevent lenders from considering any pertinent information necessary to evaluate the creditworthiness of an applicant. Moreover, the regulation includes a section stipulating that information generated by self-tests voluntarily conducted by Rewarding HealthyHabits, LLC dba HealthyHabits to determine its compliance with the ECOA and Regulation B is considered privileged under certain circumstances.

# POLICY STATEMENT

The board of directors, management, and staff of Rewarding HealthyHabits, LLC dba HealthyHabits are committed to full compliance with the Equal Credit Opportunity Act (ECOA) (15 USC 1691) which is implemented by the Consumer Financial Protection Bureau’s Regulation B (12 CFR 1002). It is the policy of Rewarding HealthyHabits, LLC dba HealthyHabits to make credit products available to all applicants who meet our business focus in a fair and consistent manner within the confines of safe and sound practices.

Rewarding HealthyHabits, LLC dba HealthyHabits does not discriminate against any credit applicant on the basis of:

* Race
* Sex
* Color
* Religion
* National origin
* Marital status
* Age (providing the applicant is of legal age and has the capacity to enter into a binding legal contract)
* Receipt of public assistance, or;
* If the individual has exercised in good faith any right under the Consumer Credit Protection Act (15 USC 1602), or on any other prohibited basis

It is the intention of Rewarding HealthyHabits, LLC dba HealthyHabits to comply with all fair lending laws and regulations, including the ECOA. Our fair lending commitment is detailed in our Fair Lending Policy.

# BUSINESS AREAS IMPACTED

The policies and procedures in this policy are applicable to the following business units in Rewarding HealthyHabits, LLC dba HealthyHabits:

* Credit application processing
* Credit product marketing/forms
* Credit operations
* Member service

# POLICY AND PROCEDURES

Under the ECOA, it is unlawful for Rewarding HealthyHabits, LLC dba HealthyHabits to discriminate on a prohibited basis in any aspect of a credit transaction. We may not, based on a prohibited basis:

* Fail 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
* Discourage or selectively encourage applicants with respect to inquiries about or applications for credit
* Refuse to extend credit or use different standards in determining whether to extend credit
* Vary the terms of credit offered, including the amount, interest rate, duration, or type of loan
* Use different standards to evaluate collateral
* Treat a borrower differently in servicing a loan or invoking default remedies
* Express, orally or in writing, a preference based on prohibited factors or indicate that we will treat applicants differently on a prohibited basis