



THE IMPAC COMPANIES FAIR LENDING POLICY

Excel Mortgage Servicing, Inc. dba Impac Mortgage and Amerihome Mortgage Corporation (collectively, "Impac") are committed to treating all customers fairly and equally. We strive to ensure Impac does not discriminate in any part of lending transactions based on the following:

- Race,
- Color,
- Religion,
- National Origin,
- Sex,
- Marital Status,
- Familial Status,
- Military Status,
- Sexual Orientation,
- Age, provided the applicant has the capacity and is of an age meeting the underwriting requirements for age,
- Disability,
- Receipt of public assistance income, whether a person has exercised any right under the Consumer Protection Act (this includes the Truth in Lending Act), or
- Any other basis prohibited by law

Impac's management and employees are committed to the practices of fair lending. It is Impac's policy to make credit products available to all applicants who meet our business focus in a fair and consistent manner within the confines of a safe and sound business practices.

The following is Impac's Fair Lending Policy.

- Impac is fully committed to the principle all credit decisions should be made without regard to the items listed above and will fulfill this commitment while maintaining prudent credit discipline and sound business practices.
- Impac recognizes affirmative steps must be taken to ensure that this principle is applied consistently and continuously throughout all aspects of our credit operation, including product design, sales and marketing, underwriting, training, performance evaluation, and servicing practices.
- Everyone at Impac involved in the credit process must strictly comply with fair lending requirements.
- Impac monitors the operation and achievements on a regular basis to ensure procedures are followed and Impac's objectives are met. Impac will continue to make changes in our operation as we identify ways to more effectively meet our commitment to fair lending.
- Impac requires loan terms, rates and fees to be consistent with applicant qualification, the applicant has the ability to repay the obligation and the applicant receives a tangible benefit from the loan transaction.