CONSUMER PROTECTION PRACTICES

The Bancorp is committed to providing quality financial services to consumers in a fair and responsible manner. By doing so, we can build lasting relationships and help consumers meet their financial goals.

Ethical Business Practices

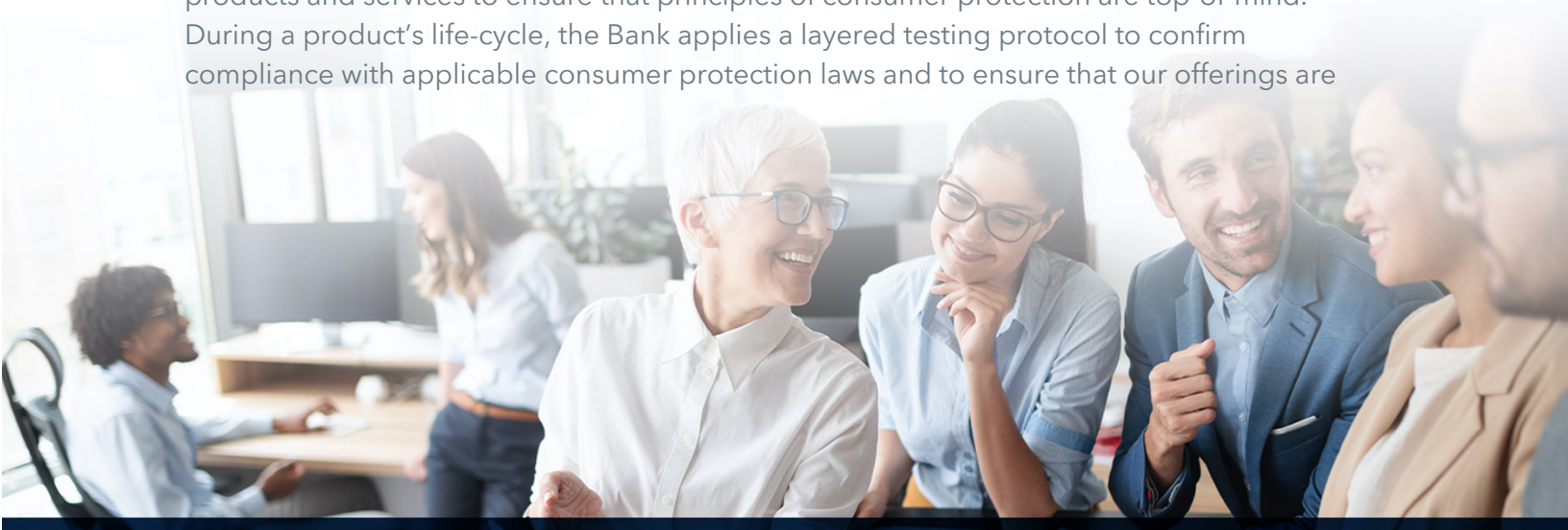
Consistent with our Corporate Values, we strive to deliver products and services with the highest standard of financial and ethical responsibility and accountability. The Bancorp Code of Ethics and Business Conduct sets the standard for these practices and requires, among other things, honest and ethical conduct and compliance with:

- The letter and spirit of applicable laws, including consumer protection laws
- Rules and regulations that prohibit unethical, discriminatory, or predatory practices
- Laws prohibiting Unfair, Deceptive or Abusive Acts or Practices (UDAAP)

All employees have a responsibility to comply with the Code of Ethics and Business Conduct and are required to read and acknowledge the Code annually. Employees must also complete UDAAP compliance training on an annual basis.

Consumer Compliance

Our Compliance Department plays a key role in the Company's commitment to provide products and services fairly and responsibly. The Bancorp has implemented a *Compliance Risk Management Program* ultimately intended to facilitate consumer protection. Experienced compliance personnel are consulted during the development and marketing of products and services to ensure that principles of consumer protection are top-of-mind. During a product's life-cycle, the Bank applies a layered testing protocol to confirm compliance with applicable consumer protection laws and to ensure that our offerings are



delivered to customers as designed. This includes compliance with the following consumer protection laws and their implementing regulations:

- UDAAP
- Truth in Lending Act
- Truth in Savings Act
- Fair Credit Reporting Act
- Electronic Fund Transfer Act
- Other applicable consumer protection laws

Compliance personnel work with the Bank's lines of business as well as our clients and business partners to develop and communicate products and services to consumers in a clear, honest and compliant manner.

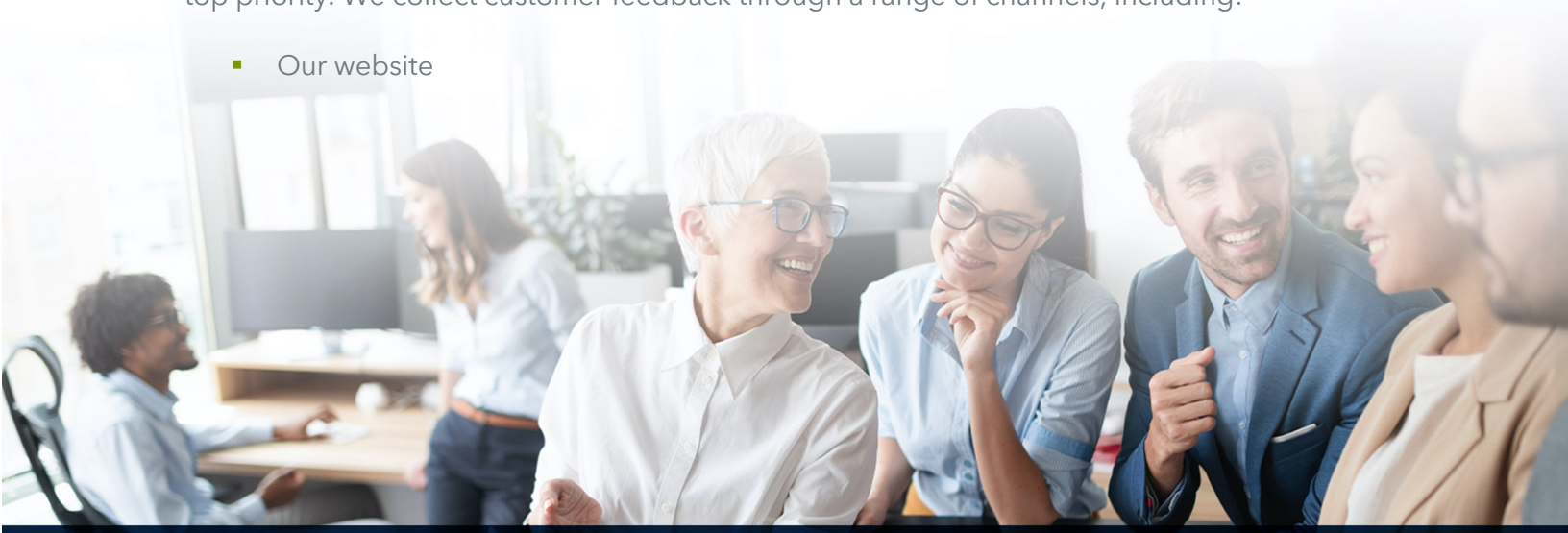
Product and Service Reviews

New products and services as well as product and service expansions and modifications are also carefully reviewed by our New Products, Services or Approval for Change (NPSAC) Committee or Program Approval Committee (PAC). Comprised of our business-line leadership, as well as representatives from the Bank's Compliance, Legal, Risk, Marketing, Financial Crimes Risk Management and other corporate functions, the NPSAC Committee provides a centralized forum for presenting and evaluating new or modified product and service offerings. This process includes documenting and discussing material risks associated with such offerings and implementing controls to reduce or eliminate such risks.

Complaint Management

As we deliver products and services, listening and responding to customer complaints is a top priority. We collect customer feedback through a range of channels, including:

- Our website



- Applications
- Telephone
- Social media
- Regulatory agencies
- Reporting from our clients and program partners

We take this feedback seriously and consider it as we work to improve our approach and offerings. To aid in this effort, we have a robust complaint management process as required by our Complaint Policy. This includes policies and procedures designed to ensure timely and effective resolution of complaints, regular reporting to management, and trending and root cause analyses to determine potential solutions.

Information Security

Protection of customers' personal and financial information is a vital component of our business operations. We safeguard personal information through a wide range of technological, administrative, organizational and physical security measures and we require that applicable third parties, such as our suppliers and vendors, protect this information as well. In addition, our Code of Ethics and Business Conduct and other policies include specific guidelines about how employees should safeguard customers' information.

We have an incident management process in place to respond to any suspected or actual incident involving unauthorized access to or disclosure of personal information, its availability or an impact to its integrity. This process requires escalation to a dedicated response team for mitigation, severity assessment, root cause analysis and corrective actions. We notify impacted individuals of privacy breach incidents in accordance with applicable state or federal law. See our disclosure on Cybersecurity & Business Continuity Programs for more on our approach to cybersecurity.