Boxwood Mortgage LLC Fair Lending Plan 2026

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Fair Housing and Fair Lending Acts

Plan Overview

Boxwood Mortgage LLC is required to comply with all applicable federal and state Fair Lending statutes, including but not limited to the **Federal Fair Housing Act ("FHA")** and the **Equal Credit Opportunity Act ("ECOA")**. This Fair Lending Plan applies to residential mortgage loans, as well as any consumer or business transaction involving the extension of credit.

In addition, these **principles** apply to all business practices of Boxwood Mortgage LLC, including purchase financing, refinancing transactions, and servicing or collections activities, where applicable.

Boxwood Mortgage LLC designates **Geroldine "Patti" Contrasto, NMLS #294661**, President, Mortgage Broker, and Compliance Director, as the Company's **Compliance Manager** and the individual primarily responsible for implementing, maintaining, monitoring, and reporting on this Fair Lending Plan.

Regular Monitoring

Each loan file is subject to a compliance review upon closing. That review ensures that the loan file has been properly reviewed and that all required federal and state disclosures have been provided.

A minimum of **10% of loan production** shall be reviewed as part of the Company's Quality Control Plan, and Fair Lending determinations shall be assessed during each of these reviews. As part of this process, any deficiencies identified shall be reported to Senior Management for corrective action and remediation.

Denied and Withdrawn Applications

Pursuant to the Company's underwriting and credit policies, all applications that are denied, rejected, or withdrawn shall be subject to a second-level review to ensure compliance with applicable Fair Lending laws, regulations, and internal policies.

In addition, a minimum of **10% of all denied, rejected, and withdrawn applications** shall be randomly selected for a complete compliance review to identify potential Fair Lending concerns, inconsistencies, or trends requiring corrective action.

Training Program

All origination, production, and compliance personnel who are required to be licensed under the **Secure and Fair Enforcement for Mortgage Licensing Act of 2008 ("SAFE Act")** shall receive annual training regarding Fair Lending laws and related consumer protection regulations.

Boxwood Mortgage LLC provides initial Fair Lending training to all new employees, Mortgage Loan Originators, and applicable staff members and provides additional training whenever regulatory changes, updates, or guidance are issued by federal or state regulators.

Training records shall be maintained in accordance with the Company's record retention policies.

Wholesale

To the extent Boxwood Mortgage LLC originates loans through wholesale lending channels, the Company shall obtain written acknowledgements, certifications, or contractual assurances from applicable third parties confirming compliance with all applicable Fair Lending laws and regulations and this Fair Lending Plan.

Proactive Complaint Resolution

Fair Lending complaints shall be resolved promptly, fairly, and professionally through the Company's **Complaint Resolution Process** referenced herein.

Once a complaint is received, it is the responsibility of **Boxwood Mortgage LLC** to investigate, respond to, and resolve the complaint in accordance with applicable federal and state laws and Company policies and procedures. The responsibility for resolution rests with the Company and not with the consumer.

Complaints alleging discrimination or Fair Lending violations shall be escalated immediately to the Compliance Manager for review and resolution. All complaints and their resolutions shall be documented and maintained in accordance with the Company's record retention policies.

Review of Marketing Material

Boxwood Mortgage LLC's Marketing, Advertising and Solicitation Policy and Procedures, which are incorporated herein by reference and form part of the Company's origination and loan production process, require that **ALL advertising, marketing, and solicitation materials** be reviewed and approved prior to publication or distribution.

All advertising materials shall be reviewed and approved by Production Management and the Compliance Manager, as designated under the Company's Quality Control and Compliance Program.

This review includes, but is not limited to:

- Print advertisements
- Flyers and brochures
- Websites and landing pages
- Social media content and advertisements
- Email campaigns
- Lead generation materials
- Co-branded marketing materials
- Rate sheets and promotional materials intended for consumers

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Role of Compliance Manager

In addition to the responsibilities identified throughout this Fair Lending Plan, the Compliance Manager is responsible for maintaining, reviewing, updating, and administering the Company's compliance-related policies and procedures.

The Compliance Manager shall also be responsible for:

- Monitoring compliance with Fair Lending and Fair Housing laws.
- Reviewing advertising and marketing materials for regulatory compliance.
- Overseeing employee training requirements.
- Reviewing complaints alleging discrimination or unfair treatment.
- Monitoring regulatory changes and implementing policy updates as necessary.
- Reporting material compliance issues to Senior Management.

For purposes of this Fair Lending Plan, the designated Compliance Manager for Boxwood Mortgage LLC is:

Geroldine "Patti" Contrasto

President, Mortgage Broker and Compliance Director

Individual NMLS ID #294661

Phone: 713-387-9521

Email: patti@boxwoodmortgage.com

Fair Lending Compliance

Introduction

Regulations governing the extension of credit are among the most important federal consumer protection laws affecting the mortgage industry. While the **Real Estate Settlement Procedures Act ("RESPA")** governs settlement services and related transactions, and the **Truth in Lending Act ("TILA")** governs the disclosure of loan terms and costs, the credit decision-making process itself is primarily governed by the **Equal Credit Opportunity Act ("ECOA")**.

In addition to establishing how credit decisions must be made and communicated, ECOA also regulates the information that may and may not be considered in evaluating an applicant for credit. In this way, the **Equal Credit Opportunity Act ("ECOA")** and the **Fair Housing Act ("FHA")** work together as part of a national effort to eliminate unlawful discrimination and ensure equal access to credit for all applicants.

As a matter of national policy, these laws were enacted to promote homeownership, economic development, and equal access to financial opportunity. Their impact has been particularly significant in historically underserved communities and markets that have previously experienced discriminatory or predatory lending practices.

Federal fair lending regulation is based on the principle that homeownership contributes to economic stability, wealth creation, and community development. Expanding access to responsible credit in underserved markets supports these public policy objectives and strengthens the housing finance system as a whole.

Much of the consumer protection legislation enacted during the late 1960s and 1970s emerged from the broader civil rights movement and represented a significant expansion of federal consumer protections. The **Truth in Lending Act**, **Consumer Credit Protection Act**, **Real Estate Settlement Procedures Act**, and **Equal Credit Opportunity Act** were among the foundational laws that established the modern regulatory framework governing mortgage lending practices.

While the concept of fair treatment in lending and housing may appear straightforward today, these protections have played a critical role in promoting economic growth, increasing homeownership opportunities, and improving access to credit throughout the United States.

The laws protecting consumers from discriminatory, unfair, deceptive, or unethical lending practices continue to evolve as technology, business practices, and financial products change. For example, merged credit reports, electronic disclosures, digital applications, and online commerce have introduced new compliance considerations that did not exist when many of the original statutes were enacted.

As a result, the regulatory framework governing mortgage lending continues to expand and evolve in response to changes in the marketplace, consumer behavior, technology, and regulatory expectations. Boxwood Mortgage LLC remains committed to maintaining compliance with all applicable federal and state fair lending laws and regulations.

Year	**Law**	**Acronym**
1968	The Fair Housing Act (Title VIII of the Civil Rights Act)	FHA
1968	Truth in Lending Act (Consumer Credit Protection Act)	TILA
1970	The Fair Credit Reporting Act	FCRA
1974	The Equal Credit Opportunity Act	ECOA
1974	Housing and Community Development Act	HCD

Year	Law	Acronym
1975	Home Mortgage Disclosure Act	HMDA
1977	Housing Financial Discrimination Act	HFDA
1977	Fair Debt Collection Practices Act	FDCPA
1977	Community Reinvestment Act	CRA
1980	Electronic Fund Transfer Act	EFTA
1988	Fair Housing Amendments Act	FHAA
1994	Homeownership and Equity Protection Act (Amendment to TILA, also known as Section 32)	HOEPA
1995	Housing for Older Persons Act	HOPA
1996	Consumer Credit Reporting Reform Act	CCRRA
1998	Homeowners Protection Act	HPA
1999	Gramm-Leach-Bliley Act	GLBA
2001	Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act	USA PATRIOT Act
2003	Fair and Accurate Credit Transactions Act	FACTA
2005	Bankruptcy Abuse Prevention and Consumer Protection Act	BAPCPA

While these laws are federal in nature, individual states are also authorized to enforce federal fair lending and consumer protection laws within their respective jurisdictions. Although federal law generally establishes the minimum regulatory standards governing mortgage lending activities, states may adopt and enforce laws and regulations that are more restrictive or provide greater consumer protections than federal law.

As a result, mortgage lenders and mortgage brokers must comply not only with federal laws and regulations, but also with applicable state statutes, administrative rules, and licensing requirements. This is particularly true in areas involving predatory lending, high-cost mortgage loans, consumer disclosures, and unfair or deceptive lending practices.

The CFPB and Secondary Regulators

The creation of the **Consumer Financial Protection Bureau ("CFPB")** pursuant to the **Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010** consolidated primary rulemaking, supervisory, and enforcement authority for many federal consumer financial protection laws under a single federal agency.

While the CFPB serves as the primary federal regulator for consumer financial protection matters, numerous federal and state agencies continue to play important roles in supervision, examination, enforcement, and referral activities involving mortgage lending and fair lending compliance.

These agencies remain actively involved in identifying potential violations, investigating consumer complaints, conducting examinations, and coordinating enforcement actions where appropriate.

Federal agencies involved in the oversight and enforcement of consumer financial laws include, but are not limited to:

- Consumer Financial Protection Bureau (CFPB)
- Federal Trade Commission (FTC)
- Department of Housing and Urban Development (HUD)
- United States Department of Justice (DOJ)
- Federal Deposit Insurance Corporation (FDIC)
- Office of the Comptroller of the Currency (OCC)
- National Credit Union Administration (NCUA)
- Federal Housing Finance Agency (FHFA)

In addition to federal oversight, **Boxwood Mortgage LLC** is subject to regulation, examination, and licensing oversight by the **Texas Department of Savings and Mortgage Lending (SML)** and any other state regulatory authority in jurisdictions where the Company is licensed to conduct mortgage business.

Mortgage companies and mortgage brokers operating without a federal charter remain subject to oversight by the CFPB, FTC, HUD, DOJ, and applicable state regulatory agencies.

Fair Lending and the Equal Credit Opportunity Act

Federal Reserve Regulation B — 12 CFR Part 202

The **Equal Credit Opportunity Act ("ECOA")** is one of the primary federal laws protecting consumers in connection with the extension of credit and mortgage lending activities. ECOA establishes prohibited bases for discrimination and governs how credit decisions must be communicated to applicants.

In addition to prohibiting discrimination, ECOA regulates the information that may be requested, considered, or used in evaluating a credit application and establishes notification requirements for adverse action and other credit decisions.

For purposes of this Fair Lending Plan, **Boxwood Mortgage LLC** shall comply with all requirements of **Regulation B (12 CFR Part 202)** and all applicable federal and state fair lending laws and regulations.

General Rules for Compliance — §202.4

Discrimination

Boxwood Mortgage LLC shall not discriminate against any applicant on any prohibited basis with respect to any aspect of a credit transaction.

Discouragement

Boxwood Mortgage LLC shall not make any oral or written statement to applicants or prospective applicants that would discourage a reasonable person from applying for credit on a prohibited basis.

Written Applications

Boxwood Mortgage LLC shall obtain written applications for all dwelling-related credit transactions in accordance with applicable federal and state laws and investor requirements.

Disclosure Requirements

Boxwood Mortgage LLC shall provide timely notice whenever the status of an application changes and shall provide all disclosures, notices, and communications required by applicable law.

Term	Definition
Applicant	Any person who requests or has received an extension of credit from Boxwood Mortgage LLC, including guarantors, co-borrowers, and other persons who may become contractually liable for repayment of the obligation.
Dwelling	A residential structure containing one-to-four family units, including condominium units, cooperative units, manufactured housing, and mobile homes, regardless of whether such property is considered real property under applicable state law.
Application	An oral or written request for credit made in accordance with procedures established by Boxwood Mortgage LLC. Mortgage applications for dwelling-related credit transactions must be in writing. Applications do not include advances under existing lines of credit.
Completed Application	A completed application exists when Boxwood Mortgage LLC has received all information regularly obtained and considered in making a credit decision. The Company shall exercise reasonable diligence in obtaining such information from the applicant.
Credit	The right granted by a creditor to defer payment of a debt, incur debt and defer payment thereof, or purchase property or services and defer payment for such purchase.
Creditor	A person or entity that regularly participates in decisions regarding the extension of credit. This includes mortgage brokers and mortgage companies that regularly refer applicants to creditors or investors or participate in selecting creditors for applicants.
Credit Transaction	Every aspect of an applicant's dealings with Boxwood Mortgage LLC regarding an application for credit or an existing extension of credit.
Empirically Derived Credit Scoring System	A system that evaluates an applicant's creditworthiness mechanically based upon key attributes of the applicant and the transaction and determines, either alone or in conjunction with additional information, whether the applicant is deemed creditworthy.
Extend Credit	The granting of credit in any form, whether directly or indirectly.

Defining "Application"

Application Paths and Requirements

Understanding the distinction between the various stages of the mortgage origination process assists Mortgage Loan Originators in determining the appropriate process, required disclosures, and applicable regulatory requirements.

It is important to distinguish between a **product discussion**, **pre-qualification**, **pre-approval**, and a formal **mortgage application**, as each stage may trigger different disclosure obligations and regulatory requirements.

Generally, a transaction does not become a complete mortgage application for a specific credit decision until the borrower has identified a property and Boxwood Mortgage LLC has received sufficient information to make a credit determination. However, certain consumer protections and disclosure requirements may apply prior to property selection depending upon the circumstances of the transaction and applicable federal regulations.

Mortgage Loan Originators shall ensure that all applications, disclosures, and communications are handled in accordance with applicable requirements under:

- The Equal Credit Opportunity Act (ECOA)
- Regulation B
- The Truth in Lending Act (TILA)
- Regulation Z
- The Real Estate Settlement Procedures Act (RESPA)
- State-specific disclosure requirements

Category	**Product Discussion**	**Pre-Qualification**	**Pre-Approval**	**Application**
Description	General discussion regarding rates, products, terms, and loan options.	Preliminary evaluation of borrower qualifications based on limited documentation.	Preliminary underwriting review prior to property identification.	Specific request for credit secured by identified collateral/property.
Primary Purpose	Educate borrower regarding available loan products.	Determine potential eligibility and borrowing capacity.	Evaluate creditworthiness prior to property selection.	Underwrite and approve a specific mortgage transaction.
Process	Product Discussion Worksheet. Emphasize that this is **not** an application.	Product Discussion Worksheet and borrower financial discussion.	Credit authorization, credit report, underwriting review, and preliminary approval.	Complete application package including property information, sales contract, and required disclosures.
Credit Report Required	No	Yes	Yes	Yes
Property Identified	No	No	No	Yes
LOS Status	Product Discussion	Pre-Qualification	Pre-Approval	Application Taken
Disposition	No application created. Records retained in accordance with Privacy Policy and record retention procedures.	Issue PreQualification Certificate or issue denial if appropriate.	Issue PreApproval, Denial, or Withdrawal status as applicable.	Issue Loan Commitment, Approval, Suspense, Withdrawal, or Denial.
Applicable Regulations	None generally apply beyond advertising requirements.	ECOA adverse action requirements may	ECOA adverse action requirements apply where applicable. HMDA reporting may apply	Full regulatory compliance requirements apply including

Category	Product Discussion	Pre-Qualification	Pre-Approval	Application
		apply in certain circumstances.	depending on application status.	ECOA, HMDA, TILA, RESPA, TRID, and state-specific disclosures.
Required Consumer Disclosures	None.	Estimate of Costs Form, Credit Score Disclosure (if credit obtained).	Estimate of Costs Form, Credit Score Disclosure, ARM disclosures if applicable.	Loan Estimate, Privacy Notice, Appraisal Disclosure, Servicing Disclosure, CHARM Booklet (if ARM), FACTA disclosures, Homeownership Counseling List, and all applicable federal and state disclosures.
Cost Disclosures	None	Estimate of Costs Form	Estimate of Costs Form	Loan Estimate and all applicable TRID disclosures

Underwriting Decision Process

Underwriting Flow

Responsible Party	Description of Task
Processor	Prepares the loan file for submission using the Company's standard pre-submission checklist and ensures all documentation is organized in the required file order prior to underwriting submission.
Underwriter	Upon receipt, logs the loan as submitted within the Loan Origination System ("LOS") and updates the loan status accordingly.
Underwriter	Utilizes the appropriate underwriting checklist and investor guidelines to initiate the underwriting review process.
Underwriter	For loans submitted to outside investors, mortgage insurers, or other third-party providers, determines program eligibility and investor acceptability based upon applicable guidelines.
Underwriter	Performs a complete underwriting analysis and reviews all documentation to ensure compliance with investor requirements, agency guidelines, regulatory requirements, and Company policies and procedures.
Underwriter	Issues underwriting conditions necessary to satisfy approval requirements. Conditions shall be clearly categorized as Prior to Approval, Prior to Closing, Prior to Funding, or Final Conditions, as applicable. Conditions should be prioritized according to materiality and risk significance for tracking and reporting purposes.
Underwriter	**Approval:** Issue underwriting approval and communicate approval conditions to processing staff. **Suspense:** Issue suspense notification identifying additional information or documentation required for underwriting completion. **Denial:** Conduct second-level review of denial recommendation to evaluate potential alternatives, remedies, or counter-offers prior to issuance of an adverse action notice.

Responsible Party	Description of Task
	Counter-Offer: If applicable, follow Company counter-offer procedures and applicable ECOA requirements.
Underwriter	Provide copies of approvals, suspensions, denials, and counter-offers to appropriate processing, operations, or compliance personnel for monitoring and quality control purposes. Update all loan statuses and status dates within the LOS.
Underwriter / Processor	Return the loan file to processing for collection of conditions, curing deficiencies, borrower communication, and ongoing loan management.
Processor	Obtains outstanding documentation, cures underwriting deficiencies, and resubmits the loan for final underwriting review, condition clearance, or additional consultation as necessary.
Underwriter	Reviews resubmitted documentation, clears conditions, updates underwriting decisions as necessary, and returns the file to processing for closing preparation.
Processor	Reviews all remaining prior-to-closing and prior-to-funding conditions and forwards the file to closing, funding, or the applicable investor for final approval and closing coordination.

Adoption and Approval

This Fair Lending Plan is hereby adopted by Boxwood Mortgage LLC and shall remain in effect until amended or replaced by management.

Boxwood Mortgage LLC is committed to providing equal access to credit and complying with all applicable federal and state fair lending laws and regulations, including but not limited to:

- **Equal Credit Opportunity Act (ECOA)**
- **Fair Housing Act (FHA)**
- **Regulation B**
- **Home Mortgage Disclosure Act (HMDA)**
- **Fair Credit Reporting Act (FCRA)**
- **Fair and Accurate Credit Transactions Act (FACTA)**

Approved by:

Geroldine "Patti" Contrasto
President, Mortgage Broker and Compliance Director
NMLS #294661

Signature: ________________________

Date: _1-1-2026_______________________

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