

Fair Dealing Policy

Date: 13.09.18 Version: 1.2

Under the Financial Markets Conduct Act 2013 and regulations made under it, we (Squirrel) are required to have in place a fair dealing policy with respect to the Platform. The fair dealing policy must provide mechanisms for excluding a Borrower from using the Platform if we have information that gives us reason to believe that the Borrower has engaged in conduct or made representations that are prohibited by the FMCA and the regulations made under it. This document is our fair dealing policy.

Unless the context otherwise requires, the general provisions and definitions set out under the heading "General" ([here](#)) in the Platform and Website Terms and Conditions apply in this policy.

The Fair Dealing Policy

We have processes and procedures in place which must be met before a Borrower can become a member of the Platform and apply to enter into a Loan through the Platform. These processes and procedures include verification of the Borrower's identity and personal information provided in relation to an application and undertaking credit checks in relation to the Borrower.

We also verify certain financial information provided by the Borrower in relation to a Loan application.

Where we have information that gives us reason to believe that a Borrower has, in relation to the Platform:

- a. engaged in conduct that is misleading or deceptive or likely to mislead or deceive; or
- b. made a false or misleading representation in contravention of section 22 of the FMCA; or
- c. made an unsubstantiated representation in contravention of section 23 of the FMCA,
- d. we may at any time and at our discretion:
- e. suspend or cancel the Borrower's membership to the Platform; or
- f. prohibit the Borrower from using any aspect of the Platform; or
- g. limit, in any respect, the Borrower's use of the Platform.

Implementing the Fair Dealing Policy

Our Terms set out the processes we may take to exclude a Borrower from the Platform.

Our Terms set out the processes and requirements in relation to information and credit assessments undertaken in relation to Borrowers in connection with their use of the Platform. Borrowers will be subject to credit checks, including a credit assessment based on the length of current employment, income and earnings, debt servicing and other relevant factors in order to assess the Borrower's creditworthiness. Borrowers will also be subject to verification procedures prior to being accepted as Borrowers on the Platform.

We assess a Borrower's servicing ability based on income and expense information provided in their application. On all applications we will verify the financial data provided by the Borrower by obtaining three months of bank transaction history and recent payslip or proof of income. Where a loan is secured and the security is obtained in respect of real property, we will obtain a copy of the existing mortgage, the current loan balance and a statement of rates to ensure these are not in arrears. Where the security for a loan is provided by personal property (such as cars or other assets), we will check the Personal Property Securities Register to ensure that other security is not registered in relation to the relevant asset.

We have a compliance officer and a credit and risk manager who are responsible for oversight of the Platform and monitoring the use of the Platform by Borrowers. They are also responsible for ensuring that all information required from Borrowers has been adequately provided and for checking the accuracy of the information.

Borrowers are not permitted to include marketing materials or pitch documentation on the Platform in relation to Loans. The only information provided by Borrowers in relation to a Loan that is made available to Investors is information regarding the value of the Loan and when the Loan is required. We verify this information on the basis set out above.

Some of our processes are automated and do not require manual implementation, such as our identity verification processes.