# Marketplace Lending Best Practices

A Set of Proposed Industry Standards and Recommended Best Practices for Marketplace Lending Securitizations

**Disclosure & Reporting** 

Third Edition | February 21, 2018

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Marketplace Lending Best Practices Initiative: Disclosure & Reporting Green Papers



## SFIG Marketplace Lending Best Practices Initiative

The SFIG Marketplace Lending Committee's Best Practices effort is an initiative of the Structured Finance Industry Group ("SFIG"), established with the primary goal of supporting the responsible growth of securitization in the marketplace lending sector.

Initiated by SFIG, the project seeks to identify a framework of market standards and recommended best practices through an open discussion among a broad cross-section of market participants. The initiative has established the following five work streams related to marketplace lending:

- Disclosure & Reporting;
- Representations & Warranties;
- Regulatory;
- Operational Considerations; and
- Enforcement.

#### **Premise and Goal**

The marketplace lending portion of the securitization market is relatively small and still considered by some to be nascent. Yet many market participants expect to continue to see significant growth over the coming years in the volume of securitization funding in the marketplace sector. The best practices initiative, rooted in supporting the responsible growth of securitization in the marketplace sector, will seek to identify a framework of standards and work to identify gaps in application or understanding.

The initiative seeks to establish industry consensus and provide recommendations around one or multiple accepted approaches.

It is important to stress that a "one size fits all" set of standards may not be appropriate for many reasons. Structural frameworks may vary to some degree, reflecting different market practices that arise from individual goals and strategies of different types of institutions.

There are a variety of basic models for marketplace loan origination, loan sales and assetbacked securities ("ABS") issuance involving various types of sponsors. These sponsors include marketplace platforms which partner with originating banks to originate marketplace loans and seek to sponsor their own securitizations, sponsors that acquire and aggregate marketplace loans from third party originators pursuant to their own set of acquisition guidelines, and sponsors that originate marketplace loans through a state licensed lender model.

Issuers will have different levels of risk tolerance, and varying internal policies and procedures. Further, a given framework must adequately account for and accommodate operational differences that exist between originators and aggregators acting in the role of securitization sponsor.

On the investment side, the structural considerations must account for varying types and categories of investors. Investors with differing loan level analysis capabilities and interests as well as varying levels of risk tolerance and internal governance policies and procedures may need to consider alternatives.

While SFIG cannot create legally enforceable standards, we strongly believe that the adoption of a set of common standards that are driven by industry participants will be more successful than those dictated by regulation. Given that the marketplace lending sector is a growth industry and that business practices will continue to develop, we stress the importance of taking a flexible approach to the best practices initiative. The recommendations set forth in these Green Papers will continue to evolve with the industry and the changing regulatory environment. Accordingly, we encourage issuers either to adopt one or more of the "best practices" or utilize alternative approaches in a manner that promotes transparency in the marketplace.

#### Methodology

Participants in the best practices initiative are addressing a broad range of topics in significant and intricate detail. To address fully each issue area, the committee and working group structure employs the following methodology:

- 1. Evaluating key topics that industry participants have identified as requiring standardization in order to foster a sustainable market;
- 2. Considering different approaches to these topics that involves, for each approach, engaging in an analysis and, where possible, developing a solution for legal, contractual and operational issues; and
- Explaining the relative merits of each approach, particularly highlighting potential risk implications for issuers, investors and other transaction parties.

1 SFIG is a member-based, trade industry advocacy group focused on improving and strengthening the broader structured finance and securitization market. SFIG provides an inclusive network for securitization professionals to collaborate and, as industry leaders, drive necessary changes, be advocates for the securitization community, share best practices and innovative ideas, and educate industry members through conferences and other programs. Members of SFIG represent all sectors of the securitization market including issuers, investors, financial intermediaries, law firms, accounting firms, technology firms, rating agencies, servicers, and trustees. Further information can be found at www.sfindustry.org.



## **SFIG Marketplace Lending Best Practices Initiative**

#### Disclaimer

The publication of this Marketplace Lending Best Practices Green Paper by SFIG does not mean that any or all of the opinions or recommendations herein have been adopted or endorsed by any specific SFIG member; does not create any legal obligation of any specific SFIG member; does not create any legal rights of any person; does not constitute any statement as to materiality of any matter for any purpose; does not constitute legal advice; and is not intended to express any opinion or interpretation as to any past transaction. This is intended solely to propose, analyze and recommend standards for future marketplace loan securitization transactions. SFIG members are neither required to subscribe to, nor obligated to adopt, any of the standards, analyses, recommendations or practices contained herein. As stated below under "Work Product," the recommendations in this Green Paper are preliminary and are subject to revision in future SFIG publications.

#### **Project History**

In August 2015, SFIG established the Marketplace Lending Committee. Recognizing that the marketplace lending industry is itself a growth sector, and that securitization represents a still growing source of funding to the sector, the mission of SFIG's Marketplace Lending Committee is focused on supporting responsible growth of securitization for this sector. The committee's first work product was the September 30, 2015 response to the U.S. Treasury Department's Request for Input on the marketplace lending industry. Subsequently, in February 2016, SFIG launched the Marketplace Lending Committee's Best Practices initiative and established the five work streams for the project.

The first of these five work streams to launch and begin work is the Disclosure and Reporting effort. The goal of this work stream is to publish recommended data disclosure standards for offerings of ABS securities backed by loans originated through marketplace lending platforms. The three components of this scope of work are:

- 1. Loan-level data disclosure
- 2. Pool-level dat disclosure
- 3. Historical Static Pool performance data disclosure

This third edition Green Paper includes the updated recommendations for Loan-Level Data disclosure which were published in the second edition on November 30, 2017, and also includes recommendations for pool-level and historical Static Pool performance data disclosure. This recommended disclosure package is specific to securitizations of **unsecured consumer loans**<sup>2</sup> originated by marketplace lenders ("unsecured consumer MPL loans").

The recommendations presented in the following sections are a result of deliberation and discussion by the members of the Disclosure & Reporting work stream of the Marketplace Lending Committee's Best Practices effort.

#### **Project Governance**

SFIG established a project governance framework in order to work effectively through the best practices initiative's ambitious agenda. The overarching direction of the project is governed by a Steering Committee that includes the co-chairs of each work stream and the co-chairs of SFIG's Marketplace Lending Committee. Each of the five working streams is cochairedby member organizations.

The involvement by membership in SFIG's Marketplace Lending Committee and the best practices effort is broad. Each working group differs in size, and SFIG's Marketplace Lending Committee currently includes 270 individuals, representing more than 90 SFIG member institutions. The Marketplace Lending Committee cochairs and steering committee works closely with the co-chairs of the five work streams to a complish the goals established by its members.

#### Work Product

As highlighted above, the best practices initiative aims to create standardization where achievable, clarify differences in alternative standards in a transparent manner, and develop industry best practices developed by market participants.

#### Interim "Green Papers"

The initiative is by necessity an iterative process. Achieving consensus on the topics outlined above will be a dynamic exercise, and as new topics are considered, participants may revisit previously discussed items. All final benchmark proposals identified by the project must be discussed and receive approval from SFIG's Marketplace Lending Committee.

To reach consensus among participants to the greatest extent possible, SFIG will, prior to finalizing any Best Practices White Paper (see below – "White Papers and Market Standards"), release and socialize preliminary proposed benchmark standards periodically through an interim series of "Green Papers." This release constitutes the second of such Green Papers that addresses loan-level data specifically.

<sup>2</sup> For clarification, unsecured consumer loans exclude student loans for the purposes of this Green Paper.



## SFIG Marketplace Lending Best Practices Initiative

As the project approaches its end and definitively addresses every subject area identified in the work streams, each Green Paper will become a final White Paper recommendation. While SFIG encourages early adoption of "Green Paper" standards, the best practices initiative may issue updates or revisions to preliminary recommendations on an incremental basis as the project works towards addressing each issue on the agenda. In this regard, SFIG anticipates that the Green Papers will evolve over time as project participants, comprised of thought leaders from each segment of the marketplace lending industry, and continue to evaluate the substantive issues at hand. To the extent those participants present new approaches or analyses, the initiative is designed to consider and incorporate this information and thereby remain a living, breathing and relevant forum for innovation and best practices for marketplace lending securitizations.

#### White Papers and Market Standards

As transparency of process and transparency of recommendation are of the utmost importance, SFIG does not consider that the mere creation of a set of standards is sufficient for the marketplace. Accordingly, in addition to a set of recommended standards, the best practices initiative plans to develop a detailed and comprehensive evaluation of each issue area in the form of a White Paper. The series of White Papers will, where possible, evaluate the history of the related topic, consider the nuances of each issue area, highlight alternative approaches and ultimately recommend one or a number of potential "standards." SFIG will publish the complete White Paper series, together with the consolidated set of standards, as a "best practice recommendation," with implementation of the benchmark standard(s) strongly encouraged by SFIG.

Notwithstanding the foregoing, the evolution of the project, which is driven by ongoing engagement with market and project participants, may, for some work streams, result in a White Paper version that differs substantially from early Green Paper releases. Similarly, even those White Papers may be subject to further revision as both marketplace lending products and securitization products and practices develop. This is a routine expectation for any growing market, and underscores the importance that the White Papers and market standards maintain the flexibility of being industry driven and do not become embedded into hardcoded guidance.



## **Disclosure & Reporting Proposed Best Practice: Introduction**

The goal of the Disclosure & Reporting work stream is to establish certain recommended data disclosure standards for offerings of ABS backed by loans originated through marketplace lending platforms for any asset class(es) identified by SFIG members as benefiting from their establishment in order to codify industry best practices, where possible, to foster sufficient and timely investor disclosure and reporting. In particular, industry participants seek to create consistency with existing practices and regulations currently applied to other origination channels and/or asset classes.

As of the date of this third edition Green Paper, the recommended asset disclosure package is specific to securitizations of unsecured consumer loans originated via marketplace lending platforms.

#### Scope

When setting the scope of the Disclosure & Reporting work stream for ABS collateralized by unsecured consumer MPL loans, industry participants carefully considered current market practices for ABS offerings backed by various asset classes, including student loans, auto loans and, most significantly, unsecured consumer loans originated via marketplace lending platforms. Based upon this review, participants set the scope under three collateral data components as follows:

- 1. Loan-level data disclosure
- 2. Pool-level dat disclosure
- 3. Historical Static Pool performance data disclosure

#### **Limitation Scope**

It is important to note that the scope of these best practices represent only a small and limited portion of the disclosure and reporting required of offerings of ABS backed by unsecured consumer loans as well as only a portion of the disclosure and reporting requirements related to the underlying collateral in an ABS transaction. Calculation methodologies, data definitions, and date of data determination may be recommended according to each issuer's practices. Further, these best practices were composed based upon market participants' understanding of certain known characteristics, terms and performance of current market standard unsecured consumer MPL loans and may not represent all material and/or necessary disclosure for unsecured consumer loans with varying characteristics, terms and/or performance.

Therefore, as detailed further under the **"Disclaimer"** section below, transaction parties should consult with counsel regarding comprehensive disclosure requirements to ensure their disclosure and reporting satisfies all securities laws and regulations given the specific transaction, the specific business and the specific underlying collateral.

Subsequent publications of the Marketplace Best Practices Green Papers will include recommendations for representations and warranties, including those directly related to the accuracy of the reported collateral information and the related enforcement remedies for any breach. It is important to note that the recommendations contained in this Third Edition Green Paper will be enhanced by the recommendations set forth in future publications of the Representations & Warranties and Enforcement work streams, and should be evaluated in that context.

#### **Factors Considered**

As discussed in more detail below, in arriving at the following Disclosure & Reporting Best Practices, market participants considered many factors, including, but not limited to, their understanding of relevant securities law, current market standards, the value of the disclosure to investors, whether the proposed disclosure would promote efficiency, competition, and capital formation, the impact on competition, the potential release of proprietary and/ or commercially-sensitive disclosure about an issuer's and/or originator's business, individual consumer privacy concerns such as the risk of identification of underlying obligors and the costs of providing certain disclosures. In large part these best practices codify existing practices that are already accepted by the industry.

#### Disclaimer

It is very important to note that:

The conclusions set forth herein do not necessarily reflect how courts and regulators, including the Securities and Exchange Commission ("SEC"), may view the disclosure and reporting requirements presently, or in the future. This Green Paper is not intended to be legal or regulatory advice, is not intended to establish legal standards, is strictly for general informational purposes and may not be relied on by any person as legal advice. This information is not intended to create, and receipt does not constitute, a lawyer-client relationship. Readers should not act upon this without seeking advice from professional advisers. For example, a final determination as to the disclosure and reporting is within the sole purview of each individual party, and transaction parties should consult with counsel regarding comprehensive disclosure requirements to ensure their disclosure and reporting satisfies all securities laws and regulations given the specific transaction, the specific business and the specific underlying collateral.



## **Disclosure & Reporting Proposed Best Practice: Introduction**

- The scope of these Disclosure & Reporting Best Practices is very limited and not comprehensive, as further detailed under "Limitation of Scope" on page 9.
- The principles, considerations and rationales driving these recommended Disclosure & Reporting Best Practices are based upon many items such as laws, rules and regulations, current market practice and prevailing collateral characteristics, terms, and performance. Consequently, there may be shifts in the requirements should there be future changes in law, rulemakings, formal guidance, changes in market practices, changes in collateral characteristics, or any other relevant changes or other developments. We would note that the recommendations in this Green Paper are preliminary and are subject to revision in future SFIG publications.
- Market participants considered all three collateral data components holistically when developing these Disclosure & Reporting Best Practices. Therefore any change(s) in one component may impact, not only participants' view of the necessary disclosure in such component, but also may impact participants' view of the necessary disclosure in one or both of the other components.

- The decision to include loan level disclosures in consumer asset classes should be balanced against the need to protect the underlying account obligors' identity. Obligor re-identification risk is a growing concern as "big data" technology evolves. Issuers making or considering making loan level disclosures should continuously evaluate the type and scope of their loan level disclosures to ensure proper protections are in place to guard against obligor re-identification.
- The conclusions set forth herein may not always be suitable for your particular issuer, originator, asset pool and/or transaction.

#### **Implementation Timeline**

Recognizing sufficient time needs to be provided for implementation of the best practice, the members of the Disclosure & Reporting work stream have agreed that the issuers will make commercially reasonable efforts to implement the components of the best practices as follows:

Disclosure Type	Implementation Timeframe
1. Loan-level data disclosure	18 months following date of this Third Edition
2. Pool-level data disclosure	6 months following date of this Third Edition
3. Historical Static Pool performance data disclosure	12 months following date of this Third Edition



## **Disclosure & Reporting Proposed Best Practice: Loan-Level Data**

The following section includes those recommended loanlevel data fields for each loan in the securitized pool to be provided as a "best practice" for securitizations of unsecured consumer loans originated by marketplace lenders or their partners.

#### **Developement Process**

The recommended data fields were developed with a goal of allowing investors to conduct their own evaluation of the ongoing credit quality of a particular asset, risk layering of assets, and overall risks in the pool underlying the ABS. Industry participants adopted standardized data field descriptions tailored for the unsecured loan characteristics currently found in the marketplace lending sector. Where possible, participants also standardized input values for those data fields, to reduce the cost for investors to process the data and to allow for more straightforward comparison of collateral characteristics among issuers.

Industry participants carefully considered loan-level disclosure historically provided in and considered for ABS offerings backed by various asset classes and, most significantly, unsecured consumer MPL loans. When further developing the asset-level data fields, participants were mindful of many considerations, including the cost of providing each data field versus the value of that information to investors as well as those considerations detailed in "Factors Considered" on page 10; and participants discussed them at length. Other issues discussed included:

- Concerns with the privacy implications of certain loan-level disclosure, particularly the risk that certain information could be combined with other publicly available information to discover the identities of the obligors in securitized pools, thereby revealing potentially sensitive personal and financial information about an obligor; and
- The proprietary and commercially-sensitive nature of certain data fields and the impact of providing the information.

#### **Proposed Industry Best Practice**

Market participants supported including data fields that provided information in four broad categories:

- Loan Identification and Deal Information Fields: Data fields anonymously-identifying the particular loan and the key transaction parties.
- **Origination Attributes and Loan Term Fields:** Data fields detailing the required payment stream related

to a particular loan, such as the contractual terms (interest rate, payment frequency, maturity date, etc.), scheduled payment amounts, basis for interest rate calculations and whether and how payment terms change over time.

- **Underwriting Attribute Fields:** Data fields detailing the credit quality and other characteristics of the obligor at the time of origination.
- **Performance Attribute Fields:** Data fields detailing the performance of each asset over time; for example, data about whether an obligor is making payments as scheduled and if not, the amount and timing of payments made.

The recommended data fields for each category are detailed in Exhibit A.1 below. Each proposed data point contains a title, definition, and a standardized response format. The standardized response could be a date, number, text, or coded response.

Note: the material loan-level fields may vary depending on the nature of the specific assets in the securitized pool and depending on the other disclosures provided; therefore, variation in these best practice disclosures may be necessary given other disclosure provided, the specific composition and characteristics of the assets in the particular offering and the particular issuer's resulting determinations as to the materiality of the information.

## Recommended Data and File Format and Timing of Reporting

Participants agreed that under these best practices, the asset-level data described below in Exhibit A.1 would be provided at the time of the offering as of the statistical cutoff date. Following issuance, updated asset-level data would also continue to be provided on a monthly basis allowing investors to view performance of the collateral over time. The disclosures should be provided in standardized XML (Extensible Markup Language) or CSV (Comma Separated Values) formats, thereby creating a machine-readable format that allows investors to download and analyze the data.



Attached on following pages



#### Loan Identification and Deal Information Fields

	Proposed Field Name	Field Description	Data type
1	Loan ID <sup>3</sup>	Provide unique ID number of the loan.	Integer
2	Loan Program	Provide name of platform program to which the loan was originated.	Text
3	Marketplace Platform	Provide the name of the entity that hosts the platform on which borrower applied for the loan.	Text
4	Cosigner Indicator <sup>4</sup>	Indicate whether the loan has a cosigner.	Text
5	Primary Servicer	Provide the name of the entity that has the right to service the loan.	Text
6	Reporting Period Begin Date	Specify the beginning date of the reporting period.	Date
7	Reporting Period End Date	Specify the end date of the reporting period.	Date

#### **Origination Attributes and Loan Term Fields**

	Proposed Field Name Field Description		Data type
8	Originating Entity	<b>nating Entity</b> Identify the name of the entity that originated the loan.	
9	Payment Frequency       Specify the code indicating how often payments are required or if a balloon payment is due.         Proposed Codes: 001: Bi-weekly       O02: Monthly         003: Quarterly       O04: Balloon         098: Other       Other		Integer or Text
10	Marketplace Platform	Specify the code indicating the payment schedule type of the loan (e.g., including as applicable, simple interest, level payment, interest only payment, graduated payment, extended graduated payment or another defined payment schedule type). Proposed Codes: 001: Fully Amortizing	Integer or Text

<sup>3</sup> The Loan ID number must reference a single asset within the pool and should be the same number that will be used to identify the asset for all reports. If an asset is removed and replaced with another asset, the asset added to the pool should be assigned a unique asset number applicable to only that asset.

<sup>4</sup> Currently, no SFIG members are originating unsecured consumer marketplace lending loans that include a co-signer. To the extent that in the future unsecured consumer loans begin to be originated and securitized with a co-signer and such co-signer's credit is a material factor in the underwriting decision of such loan, SFIG members have agreed that additional fields related to the co-signer should be considered. At such time, SFIG Members agree to evaluate which, if any, additional fields will be added to the Best Practice.



	Proposed Field Name	Field Description	Data type
		002: Graduated payments 002: Amortizing Balloon 003: Interest Only/Balloon 004: Interest Only/Amortizing 005: Interest Only/Amortizing/Balloon 006: Principal Only 007: Minimum Payment 098: Other	Text
11	Loan APR	Provide the APR at the time of origination where APR reflects not only the interest rate but also any other charges that the borrower paid to get the loan.	Percentag Numeric
12	Original Loan Amount	Indicate the amount of the loan at the time the loan was originated.	Numeric
13	Loan Grade	Indicate the credit grade assigned to the loan by the [Originator/ Marketplace Platform].	Text
14	Original Loan Maturnity Date	Indicate the month and year in which the final payment of the loan is scheduled to be made as of the Loan Funding Date.	Date
15	Current Loan Maturnity Date	Indicate the contractual month and year in which the final payment of the loan is scheduled to be made as of the Reporting Period End Date. Note: This field is only reflective of modifications/extension of the Loan Maturity Date, else it is equal to the Original Loan Maturity Date (note it does not change due to late payments).	Date
16	Loan Funding Date	Provide the date the borrower received the proceeds of the loan. "MM/DD/YYYY" or "MM/YY" acceptable	Date
17	First Contractual Loan Payment Date	Provide the date of the first scheduled payment that was due after the loan was originated.	Date
18	Original Scheduled Loan Payment Amount	Indicate the total payment amount that was scheduled to be collected as of the Loan Funding Date (including all fees).	Numeric



## Origination Attributes and Loan Term Fields (continued)

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rigina	tion Attributes and Loan Term	Fields (continued)	
	Proposed Field Name	Field Description	Data type
19	Loan Modification Flag	<ul> <li>Indicates yes or no whether the contractual terms of the loan were modified from its original terms during the reporting period; where a Modification represents:</li> <li>any change in interest rate, temporarily or permanently</li> <li>any principal write-off</li> <li>any extension of the final maturity date</li> <li>any change in scheduled payment amount</li> <li>provided, however, "modifications" excludes , (a)</li> <li>anytemporary customer service extensions of 4 months or less in any 12-month period (such as temporary payment holidays due to natural disasters potentially impacting the borrower), (b) one-off customer service waivers of ancillary fees and (c) any delinquencies, re-ages, deferrals or customer service extensions in accordance with the servicer's guidelines and policies</li> </ul>	Text
20	Loan Modification Date	Provide the date on which the loan was most recently modified. If the loan has not been modified, state "Not Applicable".	Date or Text
21	Loan Modification Type	Specify the code indicating the code that describes the reason the asset was modified during the reporting period. Proposed Codes: 001: Permanent Interest Rate Reduction 002: Temporary Interest Rate Reduction 003: Principal Write-off 004: Change of Term 005: Maturity Date Extension 006: Change of Scheduled Payment Amount 098: Other	Integer or Tex
22	Number of Loan Modifica- tions to date	If the loan has been modified either prior to or after securitization, indicate the total number of modifications to loan terms executed during the life of the loan.	Integer
23	Number of Months Remaining in Payment Holiday Period	If the loan is currently in a Payment Holiday Period, indicate the total number of months remaining in the Payment Holiday period as of the Reporting Period End Date.	Integer
24	Reporting Period Interest Rate	Indicate the current interest rate for the loan, [prior to the adjustment for any borrower benefits,] in effect during the reporting period.	Percentage Numeric
25	Interest Rate Type	Specify code indicating whether the interest rate on the loan is fixed, variable or other. If "other" indicate specific type of interest the loan carries. Draft Codes: 001: Fixed 002: Variable 003: Other	Integer or Text



	bit A.1		
gina	tion Attributes and Loan Term	Fields (continued)	
	Proposed Field Name	Field Description	Data type
26	Interest Rate Margin	If the loan has a variable interest rate, indicate the number of percentage points that is added to the index value to establish the new interest rate at each interest rate adjustment date.	Percentage Numeric
27	Rate Index	If the loan has a variable interest rate, specify the code that describes the type and source of the index to be used to determine the new interest rate at each interest rate adjustment date.	Text
28	Interest Rate Reset Period	Indicate the number of months between each interest rate adjustments.	Integer
29	Interest Rate Ceiling	Indicate the percentage of the maximum interest rate that can be in effect during the life of the loan.	Percentage Numeric
30	Interest Rate Floor	Indicate the percentage of the minimum interest rate that can be in effect during the life of the loan.	Percentage Numeric
31	Interim Caps on Interest Rate Increases	Provide the maximum number of percentage points by which the interest rate may increase at each rate adjustment date.	Percentage Numeric
32	Day Count Convention	Specify the code indicating the number of days per month and year that are used in the calculation of the Ioan's monthly interest accruals. Proposed Codes: 001: 30/360 002: Actual/365 003: Actual/360 004: Actual/Actual 005: Actual/366 098: Other	Integer or Text
33	Capitalization Frequency	Indicate the frequency with which accrued and unpaid interest amounts will be added to the loan principal balance. Proposed Codes: 001: Monthly 003: Quarterly 006: Semi-Annually 012: Annually 365: Daily	Integer or Text
34	Convertible Interest Rate	Indicate whether the interest rate is convertible from fixed to floating and/or floating to fixed.	Text
35	Promotional Interest Rate	Indicate whether the interest rate on the loan is in Promotional Rate Period.	Text
36	Remaining Months in Promotional Interest Rate Period	If the loan is currently subject to a Promotional Interest Rate, indicate the number of months remaining at the Promotional Interest Rate.	Integer



Origination	Attributes	and Loan	Term	Fields	(continued)	
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Exhibit A.1 Drigination Attributes and Loan Term Fields (continued)					
	Proposed Field Name	Field Description	Data type		
37	Go-to Interest Rate (after Promotional Period)	Indicate the interest rate on the loan after the promotional period ends.	Percentage Numeric		
38	Benefit Program Type	Indicate the type of borrower benefit (interest rate discount, rebate of original balance, rebate of monthly payment amount, etc.), provided at the time of origination, if applicable. This column may be repeated for as many benefits as apply.	Text		
39	Benefit Percentage	If applicable (such as for interest rate discount), provide the interest rate percentage associated with the borrower benefit. This data field may be repeated for as many benefits as apply.	Percentage Numeric		
40	Benefit Status	Indicate whether the borrower is actively receiving, eligible but not actively receiving, or disqualified/ineligible for the benefit. This column may be repeated for as many benefits as apply.	Text		
41	Benefit Payment Hurdle	Indicate the number of months of payments required to receive the benefit, if applicable. This data field may be repeated for as many benefits as apply.	Integer		
42	Benefit Remaining Payments	If applicable, indicate the remaining number of months until the hurdle is met. This data field may be repeated for as many benefits as apply.	Integer		
43	Original Loan Term	Indicate the stated term of the loan in months as of the final loan approval date.	Integer		
44	Geographic Residence of the Borrower – State	Specify the residence of the borrower by providing the U.S. state or territory as of the final loan application date.	Text		

## **Underwriting Attribute Fields**

	Proposed Field Name	Field Description	Data type
45	Loan Purpose	Provided the Borrower's reported use of loan proceeds.	Text
46	Renewal Loan Indicator	enewal Loan Indicator Indicator Indicate whether the loan is a partial or full renewal of a previous loan to the same borrower on the same Marketplace Platform.	
	~	Provide the code that indicates the Borrower's reported employment status.	
47	Employment Status	Proposed Codes: 001: Employed 002: Self-employed 003: Unemployed 004: Retired 098: Other	Percentage Numeric



### **Underwriting Attribute Fields (continued)**

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	Proposed Field Name	Field Description	Data type
48	Employment Verification Flag	Indicate with a "Yes" or "No" flag, whether the employment of the borrower was verified, in accordance with the [Originating Entity's] origination policies, during the loan origination process.	Text
49	Monthly Wage Income	Provide the dollar amount per month of income associated with the employment of the party upon whom the credit decision was primarily based at loan origination.	Numeric
50	Monthly Wage Income Verification	Specify the code indicating whether the code describing the extent to which the wage income of the party upon whom the credit decision was primarily based has been verified, in accordance with the [Originating Entity's] origination policies, during the loan origination process. Proposed Codes: 001: Not stated, not verified 002: Stated, not verified 003: Verified	Integer or Tex
51	Total Mortgage Debt	Provide the total mortgage debt of the party upon whom the credit decision was primarily based at loan origination.	Numeric
52	Total Debt	Provide the total debt of the party upon whom the credit decision was primarily based at loan origination.	Numeric
53	Total Non- Mortgage Debt	Provide the total non-mortgage debt of the party upon whom the credit decision was primarily based at loan origination.	Numeric
54	Rescored Third Party Cred- it Score	Provide the borrower's score as of the rescore date. If not rescored, this field should reflect N/A.	Integer or Tex
55	Rescored Credit Score Date	Specify the date on which the score of the borrower upon whom the credit decision was primarily based was most recently rescored, unless prohibited by law. If not rescored, this field should reflect N/A. "MM/DD/YYYY" or "MM/YY" acceptable	Date or Text
56	Original Credit Score	Provide the standardized credit score of the borrower during the loan origination process.	Integer
57	Credit Score Type	Specify the type and version of third party standardized credit score used to populate the field "Original Credit Score" in row 56.	Text
58	Inquiries in the Last 6 Months	Indicate the number of borrower credit inquiries in previous 6 months as of loan origination, as reported on the borrower's credit report. Note: There may be variations in the timing of inquiry reporting and other deviations of inquiry reporting mechanics between the various credit bureaus.	Integer



#### **Underwriting Attribute Fields (continued)**

		od)	
	Proposed Field Name	Field Description	Data type
59	Mortgage Status	Indicate if the borrower had a mortgage at the time of origination, as reported on the borrower's credit report, during the loan origination process.	Text
60	Length of Employment	Indicate the number of months that the borrower had been employed by their current employer at loan origination, reported in accordance with the [Originating Entity's] origination policies. Issuer may populate the field as "Self- employed" if applicable.	Integer
61	Length of Employment Verification	Indicate the code describing the extent to which the length of employment of the borrower upon whom the credit decision was primarily based has been verified at loan origination.	Integer or Text
62	Months since Last Delinquency	Indicate the number of months since borrower's last credit delinquency at loan origination, as reported on the borrower's credit report. Note to investors: There may be variations in the timing of delinquency reporting and other deviations of reporting mechanics depending upon the credit bureau used.	Integer
63	Number of Trade Lines opened in past 12 Months	Provide the number of trade lines opened by the borrower in 12 months prior to the origination of the loan, as reported on the borrower's credit report.	
64	Balance of Revolving Credit Accounts of the Borrower	Balance of revolving credit accounts by the borrower as of origination, as reported on the borrower's credit report. Note to investors: There may be variations in revolving credit account reporting mechanics across the various credit bureaus.	Numeric
65	Utilization Percentage of Revolving Credit Account of the Borrower	Utilization Percentage of Revolving Credit Account Note to investors: There may be variations in revolving	
66	Total Borrowed Amount on Platform	Provide the total dollar amount, at the time of origination, of all outstanding unsecured personal loans for the borrower facilitated on the Marketplace Platform.	Numeric
67	Current Total Payment Amount Due	Indicate the total amount of principal, interest and other amounts due during the current reporting period that must be paid to bring the account current.	Numeric



#### **Performance Attribute Fields**

	oit A.1		
	Proposed Field Name	Field Description	Data type
68	Current Principal Amount Due⁵	Indicate the amount of principal that was scheduled to be collected during the current reporting period that must be paid to bring the account current.	Numeric
69	Current Interest Amount Due <sup>5</sup>	Indicate the amount of interest that was scheduled to be collected during the current reporting period that must be paid to bring the account current.	Numeric
70	Current Other Fee Amounts Due	Indicate the amounts other than principal and interest that was scheduled to be collected during the current reporting period that must be paid to bring the account current.	Numeric
71	Reporting Period Interest Capitalization	Indicate the incremental amount of interest that was capitalized during the current reporting period.	Numeric
72	Interest Accrual Balance	Indicate the amount of outstanding interest that has been accrued and has not been paid as of the end of the current reporting period.	Numeric
73	Reporting Period Ending Total Balance	Indicate the actual total balance of the loan as of the end of the reporting period.	Numeric
74	Reporting Period Ending Principal Balance	Indicate the principal balance of the loan as of the end of the reporting period.	Numeric
75	Reporting Period Ending Interest Balance	Indicate the interest balance of the loan as of the end of the reporting period.	Numeric
76	Date Loan Paid in Full	ate Loan Paid in Full Provide the date (MM/DD/YYYY) or month (MM/YY) on which the loan balance was reduced to zero or paid in full by the borrower.	
77	Last Date Payment Made	Indicate the date the borrower made their last payment.	Date
78	Next Payment Due Date	Provide the date the next payment on the loan is due.	Date
79	Number of Payments Made	Indicate the number of payments made since the date of disbursement of the loan.	Integer
		Specify the code indicating the 30-day delinquency bucket based on the number of days the borrower is delinquent past the borrower's payment due date.	
80	Current Delinquency Status	Proposed Codes: 001: Current 002: Late but less than 30 days delinquent 003: 30 – 59 days delinquent 004: 60 – 89 days delinquent 005: 90 – 119 days delinquent	
		006: 120+ days delinquent	

5 As an alternative, issuers may provide all data fields necessary for investors to calculate "Current Principal Amount Due" and "Current Interest Amount Due" independently.



#### **Performance Attribute Fields (continued)**

	bit A.1	ed)	
	Proposed Field Name	Field Description	Data type
81	Number of Days Past Due	Indicate the number of days the borrower is delinquent past the borrower's payment due date, as of the end of the reporting period.	Integer
82	Total Amount Past Due on Platform	Provide the total dollar amount past due on all loans for the borrower facilitated on the Marketplace Platform.	Numeric
83	Loan Payment Method	Indicate whether the Borrower has authorized the lender to debit the Borrower's designated account by ACH transfer each month.	Text
84	Reporting Period Total Amount Collected	Provide the total amount of principal, interest and fees that was collected during the reporting period whether or not from the borrower.	Numeric
85	Reporting Period Interest Collected	Provide the amount of interest that was collected during the reporting period whether or not from the borrower.	Numeric
86	Reporting Period Principal Collected	Provide the amount of principal that was collected during the reporting period whether or not from the borrower.	Numeric
87	Other Principal Adjustments	Indicate any other amounts that caused the principal balance of the loan to be decreased or increased during the reporting period, which are not considered unscheduled principal collections and are not scheduled principal amounts.	Numeric
88	Total Gross Recovery, if Charge-off	If the loan is charged off, provide the amount of any gross recoveries collected on the loan during the Reporting Period.	Numeric
89	Charged-off Date       If the loan is charged off, provide the date on which the loan balance was reduced to zero.         Either "MM/YYYY" or "MM/DD/YYYY" is acceptable format.		Date
90	Charged-off Principal Amount	If the loan is charged off, provide the amount of uncollected principal charged off.	Numeric
91	Bankruptcy Status	Indicate if the borrower is currently under bankruptcy protection.	Text
92	Decreased Status	Decreased Status Indicate if the servicer has been notified that the borrower is deceased. Proposed Codes: 001: Yes 002: No	
93	Sale of Loan Indicator <sup>6</sup>	Indicate if the loan has been sold from the trust.	Text
94	Sale Date <sup>6</sup>	Specify the date the loan was sold from the trust, if applicable.	Date

6 As an alternative to providing "Sale of Loan Indicator" and "Sale Date" in the monthly loan level report, an issuer may provide the data in a separate one-time report.



It has also been agreed that once an industry solution is reached for mitigating the issue of "loan stacking"<sup>7</sup> a data field will be added that denotes whether the loan has been checked in accordance with the industry standard to mitigate loan stacking.

## Disclosure & Reporting Proposed Best Practice: Pool-Level Data

The following section includes these recommended composition and stratification tables related to the pool of underlying assets in the securitization as a "best practice" for securitizations of unsecured consumer loans originated by marketplace lenders or their partners.

#### **Developement Process**

Market participants began with the summary statistical information and composition/stratification tables currently in use by market participants. Participants generally found the current standards to be sufficient when considered together with the upfront and ongoing monthly loan-level data described in these Disclosure & Reporting Best Practices. Many participants, especially investors, noted that if an issuer materially reduced the loan-level data provided versus those outlined in the best practice in Exhibit A.1, then they believe that issuers may need to re-consider the necessary disclosure of additional composition/stratification tables and potentially grouplevel tables.

#### **Proposed Industry Best Practice**

Participants agreed that issuers should provide the summary statistical information about the underlying securitized pool illustrated below in Exhibit A.2. This disclosure will provide a series of data points for the purpose of summarizing pool characteristics and orienting investors to the securitized pool.

Issuers would also provide composition/stratification tables for the following pool-level characteristics, as depicted in Exhibit A.3:

- Monthly [Scheduled] Loan Payment Amount
- Credit Score at Origination
- Platform Grade/RatingMonthly [Scheduled] Loan Payment Amount
- Original Term to Maturity
- Remaining Term to Maturity
- Interest Rate/Borrower RateMonthly [Scheduled]
- Original Principal Balance

- Current Principal Balance
- Days Past Due/Days Delinquent/Loan Status
- Borrower State of Residence
- Borrower Annual Stated Income
- Borrower Stated Loan Purpose

NOTE: the material characteristics may vary depending on the nature of the specific assets in the securitized pool and the other disclosures provided; therefore, variation in this best practice disclosure may be necessary given the specific composition and characteristics of the assets in the particular offering, the particular issuer's resulting determinations as to the materiality of information and other disclosure provided.

It was agreed that the following information would be presented for each of the distribution groups or ranges in the composition/stratification tables:

- Number of loansCredit Score at Origination
- Percentage of pool by number of loans
- Current principal balance
- Percentage of pool by current principal balance
- Weighted average standardized credit score
- Weighted average borrower rate

NOTE: issuers should review the need to present statistical information for each distribution group or range by other variables, if material to an issuer's particular asset pool or when considering the other disclosure provided.

## Recommended Data and File Format and Timing of Reporting

Market participants agreed that under these best practices, the pool-level data, described below in Exhibit A.2 and Exhibit A.3, would be provided at the time of the offering as of the statistical cutoff date.

<sup>7&</sup>quot;Loan stacking" is when a consumer takes out multiple loans without a lender's knowledge by essentially applying and being approved for one loan, then in a relatively short period of time securing one or more additional loans before the credit bureaus reporting technology can report the initial new loan activity.



## Form of Total Portfolio Composition Report for Unsecured Consumer MPL Loans

Attached on following pages



#### Form of Total Portfolio Composition Report for Unsecured Consumer MPL Loans

Composition of the Statistical Pool as the Cut-Off Date <sup>8</sup>	
As of Date	XX/XX/XXXX
Aggregate Current Principal Balance	\$0.00
Aggregate Original Principal Balance	\$0.00
Number of Loans	000000
Average Current Principal Balance	\$0.00
Weighted Average Interest Rate/Borrower	0.00%
Rate	
Interest Rate/Borrower Rate (range)	0% - 0%
Weighted Average Original Term to Maturity	0 months
Weighted Average Seasoning	0 months
Seasoning (range)	0 to 0 months
Weighted Average Remaining Term to	00 months
Maturity	
Remaining Term to Maturity (range)	0 months
Weighted Average Credit Score	000
Weighted Average Stated Income	\$00,000
Top Three/Four States (by aggregate Current Principal Balance)	State 1 (0.00%), State 2 (0.00%), State 3 (0.00%)

8 Issuers are encouraged to also provide separate Total Portfolio Composition Report for each group of loans with the same original term to maturity (i.e., if a pool consists of loans with 36-month and 60-month original term, a separate Total Portfolio Composition Report for each 36- month and 60-month loans may be provided separately.



#### Where,

- (I). "Statistical Pool" is the pool of loans used to determine pool-level data on the As of Date.
- (II). "As of Date" is the statistical cutoff date as of which data is provided.
- (III). "Aggregate Current Principal Balance" is the aggregate collateral principal balance on the As of Date.
- (IV). "Aggregate Original Principal Balance" is the aggregate principal balance of the loans in the Statistical Pool measured for each loan as of the date such loan was originated.
- (V). "Number of Loans" is the aggregate number of loans in the Statistical pool on the As of Date.
- (VI). "Average Current Principal Balance" is the average outstanding principal balance of the loans in the Statistical Pool on the As of Date.
- (VII). "Weighted Average Interest Rate/Borrower Rate" is the weighted average current interest rate for all loans in the Statistical Pool, as calculated on the As of Date.
- (VIII). "Interest Rate/Borrower Rate (range)" is the minimum and maximum current interest rate for the loans in the Statistical Pool on the As of Date.
- (IX). "Weighted Average Original Term to Maturity" is the weighted average original term to maturity in months for all loans in the Statistical Pool, as calculated on the As of Date.
- (X). "Weighted Average Seasoning" is the weighted average months outstanding for all loans in the Statistical Pool, as calculated on the As of Date.

- (XI). "Seasoning (range)" is the minimum and maximum months outstanding for the loans in the Statistical Pool on the As of Date.
- (XII). "Weighted Average Remaining Term to Maturity" is the weighted average remaining term to maturity in months for all loans in the Statistical Pool, as calculated on the As of Date.
- (XIII). "Remaining Term to Maturity (range)" is the minimum and maximum Remaining Term to Maturity in months for the loans in the Statistical Pool on the As of Date.
- (XIV). "Weighted Average Credit Score" is the weighted average original credit score for all loans in the Statistical Pool, as calculated on the As of Date.
- (XV). "Weighted Average Stated Income" is the weighted average stated income of the related borrower for all loans in the Statistical Pool, as calculated on the As of Date.
- (XVI). "Top Three/Four States (by aggregate Current Principal Balance)" is a list of the top three or four highest concentration states of borrower residence based upon each state's aggregate current principal balance as a percentage of the aggregate current principal balance of the Statistical Pool, on the As of Date.



## Form of Composition Tables for Unsecured Consumer MPL Loans

Attached on following pages



## Form of Composition Tables for Unsecured Consumer MPL Loans

For each Composition Table, below, if an issuer uses a different grouping methodology as matter of internal policy, the issuer will designate those groupings and provide explanatory disclosure; provided, however, a minimum number of groupings are provided, as denoted under each respective Composition Report.

#### Composition Report: Monthly Loan Payment<sup>9</sup>

Monthly Loan Payment (\$)	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
\$0.01 to \$100.00	000,000	00.00%	000,000	00.00%	000	00.00%
\$100.01 to \$200.00	000,000	00.00%	000,000	00.00%	000	00.00%
\$200.01 to \$300.00	000,000	00.00%	000,000	00.00%	000	00.00%
\$300.01 to \$400.00	000,000	00.00%	000,000	00.00%	000	00.00%
\$400.01 to \$500.00	000,000	00.00%	000,000	00.00%	000	00.00%
\$500.01 to \$600.00	000,000	00.00%	000,000	00.00%	000	00.00%
\$600.01 to \$700.00	000,000	00.00%	000,000	00.00%	000	00.00%
\$700.01 to \$800.00	000,000	00.00%	000,000	00.00%	000	00.00%
\$800.01 to \$900.00	000,000	00.00%	000,000	00.00%	000	00.00%
\$900.01 to \$1,000.00	000,000	00.00%	000,000	00.00%	000	00.00%
\$1,000.01 to 1,100.00	000,000	00.00%	000,000	00.00%	000	00.00%
1,1000.01 to 1,200.00	000,000	00.00%	000,000	00.00%	000	00.00%
1,200.01 and above	000,000	00.00%	000,000	00.00%	000	00.00%
Total:	00,000,000	100.00%	000,000,000	100.00%	000	00.00%

9 For Composition Report: Monthly Loan Payment, if an issuer has more than [20]% of the pool, by receivable balance, in any one grouping, then the issuer would split that grouping into at least two smaller Monthly Loan Payment ranges such that no more than [20]% of the pool is in any one grouping.



#### Composition Report: Credit Score at Origination<sup>10</sup>

Credit Score at Origination	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
600 – 619	000,000	00.00%	000,000	00.00%	000	00.00%
620 – 639	000,000	00.00%	000,000	00.00%	000	00.00%
640 – 659	000,000	00.00%	000,000	00.00%	000	00.00%
660 – 679	000,000	00.00%	000,000	00.00%	000	00.00%
680 – 699	000,000	00.00%	000,000	00.00%	000	00.00%
700 – 719	000,000	00.00%	000,000	00.00%	000	00.00%
720 – 739	000,000	00.00%	000,000	00.00%	000	00.00%
740 – 759	000,000	00.00%	000,000	00.00%	000	00.00%
760 – 779	000,000	00.00%	000,000	00.00%	000	00.00%
780 – 799	000,000	00.00%	000,000	00.00%	000	00.00%
800 - 819	000,000	00.00%	000,000	00.00%	000	00.00%
820 and above	000,000	00.00%	000,000	00.00%	000	00.00%
Total:	00,000,000	100.00%	000,000,000	100.00%	000	00.00%

10 If the credit score used is not FICO, an issuer would designate similar groupings and provide explanatory disclosure. If more than [20]% of the pool, measured by receivable balance, is in "Less than 600", then the issuer would replace "Less than 600" and "600-629" in the Composition Report – Credit Score at Origination table with five groupings: "Less than 570," " 570-584," "585-599," "600-614" and "615-629



#### Composition Report: Platform Grade/Rating<sup>11,12</sup>

Grade	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
XX	000,000	00.00%	000,000	00.00%	000	00.00%
x	000,000	00.00%	000,000	00.00%	000	00.00%
x	000,000	00.00%	000,000	00.00%	000	00.00%
x	000,000	00.00%	000,000	00.00%	000	00.00%
x	000,000	00.00%	000,000	00.00%	000	00.00%
x	000,000	00.00%	000,000	00.00%	000	00.00%
XX	000,000	00.00%	000,000	00.00%	000	00.00%
Total:	00,000,000	100.00%	000,000,000	100.00%	000	00.00%

#### Composition Report: Original Term Maturity<sup>13</sup>

Original Term to Maturity (Months)	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
36	000,000	00.00%	000,000	00.00%	000	00.00%
60	000,000	00.00%	000,000	00.00%	000	00.00%
84	000,000	00.00%	000,000	00.00%	000	00.00%
Total:	00,000	100.00%	000,000,000	100.00%	000	00.00%

11 The issuer will designate the appropriate groupings based on the originator's internal policy for assigning risk classification for each loan at origination. If the pool contains loans originated by more than one originator, a separate Composition Report: Platform Grade/Rating for each originator will be provided.

12 Issuers may provide a separate Composition Report: Platform Grade/Rating each group of loans with the same original term to maturity (i.e., if a pool consists of loans with 36-month and 60-month original terms, a separate Composition Report: Platform Grade/Rating for each 36- month loans and 60-month loans may be provided separately.

13 The issuer will designate the appropriate groupings based upon the original term to maturity represented in the loan pool.



Composition Report: Remaining Term to Maturity<sup>14</sup>

Remaining Term to Maturity (Months)	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
12 and below	000,000	00.00%	000,000	00.00%	000	00.00%
13 – 24	000,000	00.00%	000,000	00.00%	000	00.00%
25 – 36	000,000	00.00%	000,000	00.00%	000	00.00%
37 – 48	000,000	00.00%	000,000	00.00%	000	00.00%
49 - 60	000,000	00.00%	000,000	00.00%	000	00.00%
Total:	00,000	100.00%	000,000,000	100.00%	000	00.00%

14 The issuer will designate the appropriate groupings based upon the remaining term to maturity represented in the loan pool; provided, however, no more than [30]% of the pool, measured by receivables balance, may be grouped in one grouping and no more than [5]% of the pool, measured by receivables balance, can be grouped into an "Other" grouping.



### Composition Report: Interest Rate/Borrower Rate<sup>15</sup>

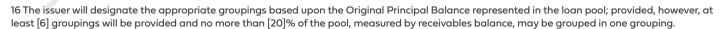
Gross/Borrower Interest Rate %	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
2.01 to 4.00	000,000	00.00%	000,000	00.00%	000	00.00%
4.01 to 6.00	000,000	00.00%	000,000	00.00%	000	00.00%
6.01 to 8.00	000,000	00.00%	000,000	00.00%	000	00.00%
8.01 to 10.00	000,000	00.00%	000,000	00.00%	000	00.00%
10.01 to 12.00	000,000	00.00%	000,000	00.00%	000	00.00%
12.01 to 14.00	000,000	00.00%	000,000	00.00%	000	00.00%
14.01 to 16.00	000,000	00.00%	000,000	00.00%	000	00.00%
16.01 to 18.00	000,000	00.00%	000,000	00.00%	000	00.00%
18.01 to 20.00	000,000	00.00%	000,000	00.00%	000	00.00%
20.01 to 22.00	000,000	00.00%	000,000	00.00%	000	00.00%
22.01 to 24.00	000,000	00.00%	000,000	00.00%	000	00.00%
24.01 to 26.00	000,000	00.00%	000,000	00.00%	000	00.00%
26.01 and above	000,000	00.00%	000,000	00.00%	000	00.00%
Total:	000,000	100.00%	000,000,000	100.00%	000	00.00%

15 The issuer will designate the appropriate groupings based upon the Interest Rate/Borrower Rate represented in the loan pool; provided, however, no more than [20]% of the pool, measured by receivables balance, may be grouped in one grouping.



### Composition Report: Orginial Principle Balance<sup>16</sup>

Original Principal Balance	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
\$1,000.00 - \$5,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$5,000.01 - \$10,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$10,000.01 - \$15,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$15,000.01 - \$20,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$20,000.01 - \$25,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$25,000.01 - \$30,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$30,000.01 - \$35,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$35,000.01 - \$40,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$40,000.01 - \$45,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$45,000.01 - \$50,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$50,000.01 - \$55,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$55,000.01 - \$60,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$60,000.00 - \$65,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
Total:	000,000,000	100.00%	000,000,000	100.00%	000	00.00%





### Composition Report: Current Principle Balance<sup>17</sup>

Current Principal Balance	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
\$1,000.00 - \$5,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$5,000.01 - \$10,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$10,000.01 - \$15,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$15,000.01 - \$20,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$20,000.01 - \$25,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$25,000.01 - \$30,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$30,000.01 - \$35,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$35,000.01 - \$40,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$40,000.01 - \$45,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$45,000.01 - \$50,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$50,000.01 - \$55,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$55,000.01 - \$60,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
\$60,000.00 - \$65,000.00	0,000,000	00.00%	000,000	00.00%	000	00.00%
Total:	000,000,000	100.00%	000,000,000	100.00%	000	00.00%

17 The issuer will designate the appropriate groupings based upon the Current Principal Balance represented in the loan pool; provided, however, at least [6] groupings will be provided and no more than [20]% of the pool, measured by receivables balance, may be grouped in one grouping.



#### Composition Report: Days Past Due/Days Delinquent/Loan Status<sup>18</sup>

Days Delinquent	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
Current	000,000	00.00%	000,000	00.00%	000	00.00%
1 – 29 days	000,000	00.00%	000,000	00.00%	000	00.00%
30 – 59 days	000,000	00.00%	000,000	00.00%	000	00.00%
60 – 89 days	000,000	00.00%	000,000	00.00%	000	00.00%
90 – 119 days	000,000	00.00%	000,000	00.00%	000	00.00%
Total:	000,000	100.00%	000,000,000	100.00%	000	00.00%

#### Composition Report: Borrower State of Residence<sup>19</sup>

State	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
California	0,000,000	00.00%	000,000	00.00%	000	00.00%
New York	0,000,000	00.00%	000,000	00.00%	000	00.00%
Texas	0,000,000	00.00%	000,000	00.00%	000	00.00%
Florida	0,000,000	00.00%	000,000	00.00%	000	00.00%
Georgia	0,000,000	00.00%	000,000	00.00%	000	00.00%
Pennsylvania	0,000,000	00.00%	000,000	00.00%	000	00.00%
Ohio	0,000,000	00.00%	000,000	00.00%	000	00.00%
Virginia	0,000,000	00.00%	000,000	00.00%	000	00.00%
Washington	0,000,000	00.00%	000,000	00.00%	000	00.00%
Maryland	0,000,000	00.00%	000,000	00.00%	000	00.00%

18 If an issuer uses different delinquency groups as a matter of internal policy, the issuer will designate the groupings and provide explanatory disclosure on the internal policy.

19 The issuer will order the state groupings starting with the state with the largest percentage of current principal balance to the state with the lowest percentage of current principal balance. The issuer may choose to provide an "Other" grouping provided no more than [5]% of the pool, measured by receivables balance, can be grouped into that "Other" grouping.



### Composition Report: Borrower State of Residence (continued)

State	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrowei Rate
North Carolina	0,000,000	00.00%	000,000	00.00%	000	00.00%
Arizona	0,000,000	00.00%	000,000	00.00%	000	00.00%
Michigan	0,000,000	00.00%	000,000	00.00%	000	00.00%
Massachusetts	0,000,000	00.00%	000,000	00.00%	000	00.00%
Colorado	0,000,000	00.00%	000,000	00.00%	000	00.00%
Illinois	0,000,000	00.00%	000,000	00.00%	000	00.00%
Tennessee	0,000,000	00.00%	000,000	00.00%	000	00.00%
Minnesota	0,000,000	00.00%	000,000	00.00%	000	00.00%
Missouri	0,000,000	00.00%	000,000	00.00%	000	00.00%
Indiana	0,000,000	00.00%	000,000	00.00%	000	00.00%
Connecticut	0,000,000	00.00%	000,000	00.00%	000	00.00%
South Carolina	0,000,000	00.00%	000,000	00.00%	000	00.00%
Wisconsin	0,000,000	00.00%	000,000	00.00%	000	00.00%
Alabama	0,000,000	00.00%	000,000	00.00%	000	00.00%
Louisiana	0,000,000	00.00%	000,000	00.00%	000	00.00%
Other	0,000,000	00.00%	000,000	00.00%	000	00.00%
Total:	000,000,000	100.00%	000,000,000	100.00%	000	00.00%

5



#### **Composition Report: Borrower Annual Stated Income**

Exhibit A.3						
omposition Report: Bor	rower Annual Sta	ated Income				
Annual Borrower Income (\$)	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
0.01 to 50,000.00	000,000	00.00%	000,000	00.00%	000	00.00%
50,000.01 to	000,000	00.00%	000,000	00.00%	000	00.00%
60,000.01 to	000,000	00.00%	000,000	00.00%	000	00.00%
70,000.01 to	000,000	00.00%	000,000	00.00%	000	00.00%
80,000.01 to	000,000	00.00%	000,000	00.00%	000	00.00%
90,000.01 to	000,000	00.00%	000,000	00.00%	000	00.00%
100,000.01 to	000,000	00.00%	000,000	00.00%	000	00.00%
110,000.01 to	000,000	00.00%	000,000	00.00%	000	00.00%
120,000.01 and	000,000	00.00%	000,000	00.00%	000	00.00%
Total:	00,000	100.00%	000,000,000	100.00%	000	00.00%

#### Composition Report: Borrower Annual Stated Income

Borrower Stated Loan Purpose	Number of Loans	Percentage of Number of Loans	Current Principal Balance (\$)	Percentage of Current Principal Balance	WA Credit Score	WA Borrower Rate
Debt Consolidation	000,000	00.00%	000,000	00.00%	000	00.00%
Credit Card	000,000	00.00%	000,000	00.00%	000	00.00%
Medical	000,000	00.00%	000,000	00.00%	000	00.00%
House	000,000	00.00%	000,000	00.00%	000	00.00%
Car	000,000	00.00%	000,000	00.00%	000	00.00%
Wedding	000,000	00.00%	000,000	00.00%	000	00.00%
Major Purchase	000,000	00.00%	000,000	00.00%	000	00.00%
Total:	00,000	100.00%	000,000,000	100.00%	000	00.00%



## Disclosure & Reporting Proposed Best Practice: Historical Static Pool Performance Data

The following section includes recommended historical quarterly Static Pool performance data to be provided as a "best practice" for securitizations of unsecured consumer loans originated by marketplace lenders or their partners.

#### **Developement Process**

Participants began with the static pool tables currently in use by the industry. Discussions among participants focused on those current market practices, and participants found the prevailing standards to be largely satisfactory.

#### **Proposed Industry Best Practice**

Market participants recommended that issuers should disclose historical static pool information20 for monthly prepayment, monthly cumulative gross loss rate, delinquency, aggregate principal balance and average borrower rate, with respect to each vintage origination quarter involving the same asset type(s) over at least the last five years preceding the issuance as depicted in Exhibit A.4; provided that, consistent with market practice:

- Static pool information regarding a party or parties other than the issuer may be provided in addition to or instead of static pool information with respect to the issuer if appropriate to provide material disclosure. For example, if the issuer is securitizing assets purchased from one or more third-party originators it is appropriate to include the historical static pool data related to originations of the third party originator(s).
- If the originator has less than five years of experience originating asset of the type included in the offered asset pool, the issuer shall include the static pool data for so long as the originator has been originating assets of the type being securitized.
- Static pool data for the offered asset pool itself shall be included, to the extent material, such as in the case of securitization of seasoned assets.
- If the static pool information as directed above is not material, but alternative static pool information would provide material disclosure, such alternative information is to be provided instead. For example, a sponsor's origination program may have materially changed to the point such that information about the sponsor's vintage portfolio is not material but the static pool information for an issuer's prior securitized pools may be.

Note the importance of understanding the comparability among the historical static pools themselves as well as the comparability between the historical static pools and the securitized pool given the recognition that the historical static pools do not always remain "static" across different vintages due to changes in underwriting criteria and other variables over time and that the securitized pool may not be a representative sampling of the characteristics of loans comprising the historical static pools. Therefore, market participants agreed that, consistent with market rules, regulations and standard practice, summary comparability data and narrative descriptions should be provided to clearly and transparently distinguish the performance of loans comprising the securitized pool from those of the historical static pool information.

## Recommended Data and File Format and Timing of Reporting

Industry participants agreed that under these best practices, the historical static pool data, described below in Exhibit A.4, would be provided at the time of the offering as of the statistical cutoff date. Following issuance, updated historical static pool data would also continue to be provided on a quarterly basis allowing investors to view continued performance of the historical static pools over time.

Participants noted that the required historical static pool information could include a significant amount of data that may be difficult to provide in an offering document and difficult for investors to use in that format. Accordingly, participants agreed that the historical static pool information could be included on an Internet website and/ or in the initial offering document and ongoing transaction reports. If the issuer chooses to maintain such historical static pool information on an Internet website, such website shall be available to all qualifying investors free of charge. The disclosures should be provided in standardized XML (Extensible Markup Language) or CSV (Comma Separated Values) formats, thereby creating a machinereadable format that allows investors to download and analyze the data.



## Form of Static Pool Performance Reports for Unsecured Consumer MPL Loans

Attached on following pages



## **Static Pool Performance Report: Aggregate Principal Balance by Quarter of Origination, by Platform Rating**<sup>21</sup> Aggregate Original Principal Balance by Quarter of Origination

<u>Quarterly Static</u> Pool	AA (\$)	A (\$)	В (\$)	C (\$)	D (\$)	E (\$)
2010Q1	000,000	000,000	000,000	000,000	000,000	000,000
2010Q2	000,000	000,000	000,000	000,000	000,000	000,000
2010Q3	000,000	000,000	000,000	000,000	000,000	000,000
2010Q4	000,000	000,000	000,000	000,000	000,000	000,000
2011Q1	000,000	000,000	000,000	000,000	000,000	000,000
2011Q2	000,000	000,000	000,000	000,000	000,000	000,000
2011Q3	000,000	000,000	000,000	000,000	000,000	000,000
2011Q4	000,000	000,000	000,000	000,000	000,000	000,000
2012Q1	000,000	000,000	000,000	000,000	000,000	000,000
2012Q2	000,000	000,000	000,000	000,000	000,000	000,000
2012Q3	000,000	000,000	000,000	000,000	000,000	000,000
2012Q4	000,000	000,000	000,000	000,000	000,000	000,000
2013Q1	000,000	000,000	000,000	000,000	000,000	000,000
2013Q2	000,000	000,000	000,000	000,000	000,000	000,000
2013Q3	000,000	000,000	000,000	000,000	000,000	000,000
2013Q4	000,000	000,000	000,000	000,000	000,000	000,000
2014Q1	000,000	000,000	000,000	000,000	000,000	000,000
2014Q2	000,000	000,000	000,000	000,000	000,000	000,000
2014Q3	000,000	000,000	000,000	000,000	000,000	000,000
2014Q4	000,000	000,000	000,000	000,000	000,000	000,000
2015Q1	000,000	000,000	000,000	000,000	000,000	000,000
2015Q2	000,000	000,000	000,000	000,000	000,000	000,000
2015Q3	000,000	000,000	000,000	000,000	000,000	000,000
2015Q4	000,000	000,000	000,000	000,000	000,000	000,000
2016Q1	000,000	000,000	000,000	000,000	000,000	000,000
2016Q2	000,000	000,000	000,000	000,000	000,000	000,000
2016Q3	000,000	000,000	000,000	000,000	000,000	000,000
2016Q4	000,000	000,000	000,000	000,000	000,000	000,000
2017Q1	000,000	000,000	000,000	000,000	000,000	000,000
2017Q2	000,000	000,000	000,000	000,000	000,000	000,000
2017Q3	000,000	000,000	000,000	000,000	000,000	000,000

21 The issuer will designate the appropriate groupings based on the originator's internal policy for assigning risk classification for each loan at origination. If the pool contains loans originated by more than one originator, a separate Composition Report: Platform Grade/Rating for each originator.



#### Static Pool Performance Report: Average Borrower Rate at Origination by Quarter of Origination Aggregate Original Principal Balance by Quarter of Origination

gregate enginari init	ipui bulunce	by Quarter of O	rigination			
Quarterly Static Pool	AA (\$)	A (\$)	В (\$)	C (\$)	D (\$)	E (\$)
2010Q1	000,000	000,000	000,000	000,000	000,000	000,000
2010Q2	000,000	000,000	000,000	000,000	000,000	000,000
2010Q3	000,000	000,000	000,000	000,000	000,000	000,000
2010Q4	000,000	000,000	000,000	000,000	000,000	000,000
2011Q1	000,000	000,000	000,000	000,000	000,000	000,000
2011Q2	000,000	000,000	000,000	000,000	000,000	000,000
2011Q3	000,000	000,000	000,000	000,000	000,000	000,000
2011Q4	000,000	000,000	000,000	000,000	000,000	000,000
2012Q1	000,000	000,000	000,000	000,000	000,000	000,000
2012Q2	000,000	000,000	000,000	000,000	000,000	000,000
2012Q3	000,000	000,000	000,000	000,000	000,000	000,000
2012Q4	000,000	000,000	000,000	000,000	000,000	000,000
2013Q1	000,000	000,000	000,000	000,000	000,000	000,000
2013Q2	000,000	000,000	000,000	000,000	000,000	000,000
2013Q3	000,000	000,000	000,000	000,000	000,000	000,000
2013Q4	000,000	000,000	000,000	000,000	000,000	000,000
2014Q1	000,000	000,000	000,000	000,000	000,000	000,000
2014Q2	000,000	000,000	000,000	000,000	000,000	000,000
2014Q3	000,000	000,000	000,000	000,000	000,000	000,000
2014Q4	000,000	000,000	000,000	000,000	000,000	000,000
2015Q1	000,000	000,000	000,000	000,000	000,000	000,000
2015Q2	000,000	000,000	000,000	000,000	000,000	000,000
2015Q3	000,000	000,000	000,000	000,000	000,000	000,000
2015Q4	000,000	000,000	000,000	000,000	000,000	000,000
2016Q1	000,000	000,000	000,000	000,000	000,000	000,000
2016Q2	000,000	000,000	000,000	000,000	000,000	000,000
2016Q3	000,000	000,000	000,000	000,000	000,000	000,000
2016Q4	000,000	000,000	000,000	000,000	000,000	000,000
2017Q1	000,000	000,000	000,000	000,000	000,000	000,000
2017Q2	000,000	000,000	000,000	000,000	000,000	000,000





chibit	<b>A.4</b>										
ıtic Pool I	Performa	nce Repor	t: Month	v Volunta	rv CPR b	v Ouartei	r of Origin	nation			
						, 2001.001					
orig. Loan Amount	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000
Period	2015Q1	2015Q2	2015Q3	2015Q4	2016Q1	2016Q2	2016Q3	2016Q4	2017Q1	2017Q2	2017Q3
0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
3	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
4	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
5	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
6	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
7	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
8	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
9	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
10	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
11	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
12	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
13	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
14	0.00%	0.00%	0.00%	0.00%	0.00%						
15	0.00%	0.00%	0.00%	0.00%	0.00%						
16	0.00%	0.00%	0.00%	0.00%	0.00%						
17	0.00%	0.00%	0.00%	0.00%							
18	0.00%	0.00%	0.00%	0.00%							
19	0.00%	0.00%	0.00%	0.00%							
20	0.00%	0.00%	0.00%	0.00%							
21	0.00%	0.00%	0.00%		7						
22	0.00%	0.00%	0.00%								
23	0.00%	0.00%	0.00%								
24	0.00%	0.00%	0.00%								
25	0.00%	0.00%	0.00%								
26	0.00%	0.00%									
27	0.00%	0.00%	9								
28	0.00%	0.00%				<u> </u>					
29	0.00%	0.00%									
	0.00%	0.00%									
30					<u> </u>	<u> </u>					
31	0.00%	0.00%									
32	0.00%										
33	0.00%										
34	0.00%										
35	0.00%										
36	0.00%										



Period         2019           0         0.00           1         0.00           2         0.00           3         0.00           4         0.00           5         0.00           6         0.00           7         0.00           8         0.00           10         0.00           11         0.00           12         0.00           13         0.00           14         0.00           15         0.00           16         0.00           17         0.00           18         0.00           20         0.00           21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	2015Q1 0.00% 0.00% 0.00% 0.00% 0.00%	\$000,000 2015Q2 0.00%	\$000,000	\$000,000							
0         0.000           1         0.000           2         0.000           3         0.000           4         0.000           5         0.000           6         0.000           7         0.000           8         0.000           9         0.000           10         0.000           11         0.000           12         0.000           13         0.000           14         0.000           15         0.000           16         0.000           17         0.000           20         0.000           21         0.000           22         0.000           23         0.000           24         0.000           25         0.000           26         0.000           27         0.000           28         0.000	0.00% 0.00% 0.00% 0.00%	-			\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000
1       0.00         2       0.00         3       0.00         4       0.00         5       0.00         6       0.00         7       0.00         8       0.00         9       0.00         10       0.00         11       0.00         12       0.00         13       0.00         14       0.00         15       0.00         16       0.00         17       0.00         20       0.00         21       0.00         22       0.00         23       0.00         24       0.00         25       0.00         26       0.00         27       0.00         28       0.00	0.00% 0.00% 0.00% 0.00%	0.00%	2015Q3	2015Q4	2016Q1	2016Q2	2016Q3	2016Q4	2017Q1	2017Q2	2017Q3
2       0.00         3       0.00         4       0.00         5       0.00         6       0.00         7       0.00         8       0.00         9       0.00         10       0.00         11       0.00         12       0.00         13       0.00         14       0.00         15       0.00         16       0.00         17       0.00         20       0.00         21       0.00         22       0.00         23       0.00         24       0.00         25       0.00         26       0.00         27       0.00         28       0.00	0.00% 0.00% 0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3         0.00           4         0.00           5         0.00           6         0.00           7         0.00           8         0.00           9         0.00           10         0.00           11         0.00           12         0.00           13         0.00           14         0.00           15         0.00           16         0.00           18         0.00           20         0.00           21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4       0.00         5       0.00         6       0.00         7       0.00         8       0.00         9       0.00         10       0.00         11       0.00         12       0.00         13       0.00         14       0.00         15       0.00         16       0.00         17       0.00         20       0.00         21       0.00         22       0.00         23       0.00         24       0.00         25       0.00         27       0.00         28       0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
5         0.00           6         0.00           7         0.00           8         0.00           9         0.00           10         0.00           11         0.00           12         0.00           13         0.00           14         0.00           15         0.00           16         0.00           17         0.00           20         0.00           21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
6         0.00           7         0.00           8         0.00           9         0.00           10         0.00           11         0.00           12         0.00           13         0.00           14         0.00           15         0.00           16         0.00           17         0.00           18         0.00           20         0.00           21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
7     0.00       8     0.00       9     0.00       10     0.00       11     0.00       12     0.00       13     0.00       14     0.00       15     0.00       16     0.00       17     0.00       18     0.00       20     0.00       21     0.00       23     0.00       24     0.00       25     0.00       27     0.00       28     0.00		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
8         0.00           9         0.00           10         0.00           11         0.00           12         0.00           13         0.00           14         0.00           15         0.00           16         0.00           17         0.00           18         0.00           20         0.00           21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
9         0.00           10         0.00           11         0.00           12         0.00           13         0.00           14         0.00           15         0.00           16         0.00           17         0.00           18         0.00           20         0.00           21         0.00           23         0.00           24         0.00           25         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
10         0.00           11         0.00           12         0.00           13         0.00           14         0.00           15         0.00           16         0.00           17         0.00           18         0.00           20         0.00           21         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
11         0.00           12         0.00           13         0.00           14         0.00           15         0.00           16         0.00           17         0.00           18         0.00           20         0.00           21         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
12         0.00           13         0.00           14         0.00           15         0.00           16         0.00           17         0.00           18         0.00           19         0.00           20         0.00           21         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00           29         0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
13     0.00       14     0.00       15     0.00       16     0.00       17     0.00       18     0.00       19     0.00       20     0.00       21     0.00       23     0.00       24     0.00       25     0.00       26     0.00       27     0.00       28     0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
14         0.00           15         0.00           16         0.00           17         0.00           18         0.00           19         0.00           20         0.00           21         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00           29         0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
15     0.00       16     0.00       17     0.00       18     0.00       19     0.00       20     0.00       21     0.00       23     0.00       24     0.00       25     0.00       26     0.00       27     0.00       28     0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
16         0.00           17         0.00           18         0.00           19         0.00           20         0.00           21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00           29         0.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
17         0.00           18         0.00           19         0.00           20         0.00           21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%	0.00%						
18         0.00           19         0.00           20         0.00           21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%	0.00%						
19         0.00           20         0.00           21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%							
20         0.00           21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%							
21         0.00           22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00	0.00%	0.00%	0.00%	0.00%							
22         0.00           23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00           29         0.00	0.00%	0.00%	0.00%	0.00%							
23         0.00           24         0.00           25         0.00           26         0.00           27         0.00           28         0.00           29         0.00	0.00%	0.00%	0.00%								
24         0.00           25         0.00           26         0.00           27         0.00           28         0.00           29         0.00	0.00%	0.00%	0.00%								
25 0.00 26 0.00 27 0.00 28 0.00 29 0.00	0.00%	0.00%	0.00%								
26         0.00           27         0.00           28         0.00           29         0.00	0.00%	0.00%	0.00%								
27 0.00 28 0.00 29 0.00	0.00%	0.00%	0.00%	V							
28 0.00 29 0.00	0.00%	0.00%									
29 0.00	0.00%	0.00%									
29 0.00	0.00%	0.00%									
	0.00%	0.00%									
	0.00%	0.00%									
31 0.00	0.00%	0.00%									
	_	0.00 %									
	0.00%										
	0.00%										
	0.00%										
35 0.00 36 0.00	0.00%										

### Static Pool Performance Report: Monthly Cumulative Gross Loss Rates by Quarter of Origination



orig. Loan Amount	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000	\$000,000
Period	2015Q1	2015Q2	2015Q3	2015Q4	2016Q1	2016Q2	2016Q3	2016Q4	2017Q1	2017Q2	2017Q3
0	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
1	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
5	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
6	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
7	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		
8	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
9	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
10	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
11	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
12	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
13	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
14	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					
15	0.00%	0.00%	0.00%	0.00%	0.00%						
16	0.00%	0.00%	0.00%	0.00%	0.00%						
17	0.00%	0.00%	0.00%	0.00%							
18	0.00%	0.00%	0.00%	0.00%							
19	0.00%	0.00%	0.00%	0.00%							
20	0.00%	0.00%	0.00%	0.00%							
21	0.00%	0.00%	0.00%								
22	0.00%	0.00%	0.00%								
23	0.00%	0.00%	0.00%								
24	0.00%	0.00%	0.00%								
25	0.00%	0.00%	0.00%								
26	0.00%	0.00%									
27	0.00%	0.00%	2								
28	0.00%	0.00%									
29	0.00%	0.00%									
30	0.00%	0.00%									
31	0.00%	0.00%									
32	0.00%										
33	0.00%										
34	0.00%										
35	0.00%										
36	0.00%			<u> </u>							

#### Static Pool Performance Report: Monthly Periodic Delinquency Rates (16+ Days Delinquent) CPR by Quarter of Origination



Green Papers are iterative in nature. To the extent that participants present new approaches or analyses, or the market changes due to legal, regulatory, credit, legislative or other developments, the initiative is designed to consider and incorporate this information and thereby remain a living, breathing and relevant forum for innovation and best practices for marketplace lending securitizations.



Marketplace Lending Best Practices Initiative: Disclosure & Reporting Green Papers