



FDCPA Compliance Policy

Effective Date: May 29, 2025

Approved By: Ethan Domangue, Managing Member

1. Purpose

This policy ensures that True North Receivables Group complies with the Fair Debt Collection Practices Act (FDCPA) by holding all third-party collection vendors to the highest standards of ethical, legal, and compliant behavior.

2. Scope

This policy applies to:

- All third-party collection agencies acting on behalf of True North Receivables Group
- Internal staff responsible for vendor selection and oversight
- Any subcontractors handling consumer communication or collection activity

3. Compliance Requirements for Vendors

All vendors must:

- Be licensed and bonded in all jurisdictions where collection activity occurs
- Comply fully with FDCPA, state collection laws, and FCRA if applicable
- Provide documentation of policies, procedures, and training for FDCPA compliance
- Avoid all prohibited conduct per 15 U.S. Code § 1692d-f (e.g., harassment, false statements, threats, misrepresentation)
- Maintain accurate records of contact, disputes, and cease & desist requests
- Respond to validation and dispute notices in a timely and complete manner
- Refrain from collecting on accounts with unresolved disputes or unverified balances

4. Vendor Onboarding Requirements

Before engagement, vendors must:

- Sign a Collection Services Agreement and NDA
- Provide a copy of:
 - FDCPA training records
 - Internal compliance policy
 - State collection licenses
- Complete the standard True North Receivables Group Vendor Due Diligence Questionnaire and be approved through internal due diligence

5. Ongoing Oversight

True North Receivables Group will:

- Conduct annual reviews of all vendors
- Request monthly reporting of activity (calls, letters, complaints)
- Monitor for complaints, CFPB enforcement, or regulatory scrutiny
- Maintain an issue log and escalate any suspected violations to the Compliance Officer
- Suspend or terminate vendor relationships based on severity of violations or non-compliance patterns

6. Reporting & Escalation

Any FDCPA-related complaints or risks must be reported to:

- The Compliance Officer (or business owner if no designated staff)
- Action will be taken within 5 business days, including:
 - Temporary suspension of account assignments
 - Launching an internal investigation or vendor audit
 - Notifying legal counsel if material violations are suspected

7. Recordkeeping

All FDCPA compliance documentation, including training logs, complaint records, and vendor agreements, must be retained for at least 3 years after final activity on a given account or vendor relationship.

8. Review Cycle

This policy shall be reviewed annually or sooner in the event of changes to relevant federal or state law, or material changes to business operations that impact collection oversight.