COALITION FOR HOME EQUITY PARTNERSHIP

Corporate Governance Policies

I. DOCUMENT RETENTION POLICY

The corporate records of Coalition for Home Equity Partnership (the "Corporation") are important documents. Corporate records include essentially all records you produce as an employee, Director, or Consultant, whether paper or electronic. A record may be as obvious as a memorandum, an e-mail, or a contract, or something not as obvious, such as a computerized desk calendar, an appointment book, or an expense record.

It is the policy of the Corporation to maintain all records in accordance with the needs of the organization and the law.

The law requires that the Corporation maintain certain types of corporate records, usually for a specified period of time. Failure to retain those records for those minimum periods could subject you and the Corporation to penalties and fines, cause the loss of rights, obstruct justice, spoil potential evidence in a lawsuit, place the Corporation in contempt of court, or seriously disadvantage the Corporation in litigation.

The Corporation expects all employees and members of the Board of Directors to fully comply with this and any other published records retention policies and schedules, provided that all employees and Board members should note the following general exceptions to any stated destruction schedule: If you believe, or the Corporation informs you, that records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), audits, government investigations, or potential government investigations (i.e., a matter that could result in a government investigation), then you must preserve those records until the Corporation's legal counsel determines the records are no longer needed.

These exceptions supersede any previously or subsequently established retention schedule for those records. If you believe that an exception may apply, or have any questions regarding the possible applicability of these exceptions, please contact legal counsel.

From time to time the Corporation establishes retention policies or schedules for specific categories of records in order to ensure legal compliance, and also to accomplish other objectives, such as preserving intellectual property and cost management. Several categories of documents that bear special consideration are identified below. While minimum retention periods are suggested, the retention of the documents identified below and of documents not included in the identified categories should be determined primarily by the application of the general guidelines affecting document retention identified above, as well as any other pertinent factors.

(a) Tax Records. Tax records include, but may not be limited to, documents concerning payroll, expenses, proof of deductions, business costs, accounting procedures, and other documents concerning the Corporation revenues. Tax records should be retained for at least six years from the date of filing the applicable return.

(b) Employment Records/Personnel Records. State and federal statutes require the Corporation to keep certain recruitment, employment, and personnel information. The Corporation should also keep personnel files that reflect performance reviews and any complaints brought against the Corporation or individual employees under applicable state and federal statutes. The Corporation should also keep all final memoranda and correspondence reflecting performance reviews and actions taken by or against personnel in the employee's personnel file. Employment and personnel records should be retained for six years.

(c) Board and Board Committee Materials. Meeting minutes should be retained in perpetuity in the Corporation's minute book. A clean copy of all Board and Board Committee materials should be kept for no less than three years.

(d) Press Releases/Public Filings. The Corporation should retain permanent copies of all press releases and publicly filed documents under the theory that the Corporation should have its own copy to test the accuracy of any document a member of the public can theoretically produce against the Corporation.

(e) Legal Files. Legal counsel should be consulted to determine the retention period of particular documents, but legal documents should generally be maintained for a period of at least ten years and many should be retained permanently.

(f) Development/Intellectual Property and Trade Secrets. Development documents are often subject to intellectual property protection in their final form (e.g., patents and copyrights). The documents detailing the development process are often also of value to the Corporation and are protected as a trade secret where the Corporation:

i. Derives independent economic value from the secrecy of the information; and
ii. The Corporation has taken affirmative steps to keep the information confidential. The Corporation should keep all documents designated as containing trade secret information for at least the life of the trade secret.

(g) Contracts. Final, execution copies of all contracts entered into by the Corporation should be retained. The Corporation should retain copies of the final contracts for at least three years beyond the life of the agreement, and longer in the case of publicly filed contracts.

(h) Electronic Mail. E-mail that needs to be saved should be either:

i. Printed in hard copy and kept in the appropriate file;
ii. Downloaded to a computer file and kept electronically or on disk as a separate file; or
iii. Retained or archived without deletion.

(i) Lobbying Records. Some employees or independent contractors may be involved in state and local lobbying efforts. Some state and local lobbying statutes and regulations require that records related to the lobbying activity and public disclosures of such lobbying activity be retained for a specified period of time. If you are involved in state or local lobbying efforts, please consult legal counsel about the length of time such records must be preserved.

(j) Other Internal and External Communications. The Corporation's employees, contractors and Board members should retain final versions of correspondence and budgets, non-electronic memoranda, calendars, and financial analysis related to the Corporation for no more than 6 months, unless related to a subject matter covered elsewhere in this policy. Drafts of documents that have been put into final form need not be maintained.

(k) Solicitations. The final draft of all solicitations and fundraising materials as well as copies of any checks and contributions should be maintained for a minimum of 3 years. In addition, a record of all donors should be maintained for a minimum of 3 years.

II. CONFIDENTIALITY POLICY

In the course of performing their duties, employees, Directors, or consultants may receive sensitive and confidential information. Such information might relate to a variety of subjects. Employees and Board members are prohibited from disclosing such information to anyone outside the organization until such information has been made available to the public by assigned management. This policy shall remain in effect during your tenure with the Corporation and will survive in perpetuity following such employment or Directorship, unless otherwise stated by contract.

The internal affairs of the Corporation should be discussed with no one outside the organization except as authorized, when required in the normal course of business, or by law. Information concerning the activities or operations of the Corporation must be treated as confidential. Employees and Board members handling confidential information are responsible for its security. Reasonable care must be exercised to ensure that confidential information is safeguarded to protect the Corporation.

Employees have no proprietary interest in or rights with respect to such confidential information. Any confidential information that becomes known during the term with the Corporation is, and shall remain, the exclusive property of the Corporation. Employees and Board members shall not remove any confidential information from the Corporation upon termination.

Contact/Communication with the Press and Other External Groups: The Corporation should have individuals specifically assigned to communicate with the press and other external parties, groups, organizations, agencies, and individuals. Information management is critical to the success of any organization. Therefore, it is critical that all employees, volunteers, contractors, Directors, and interns follow these simple rules:

(a) Do not talk to the press on behalf of the Corporation unless you have been assigned or authorized to do so. If you are asked a question, respectfully indicate that you are not authorized to answer the question, and refer it to the President.
(b) Do not talk to anyone regarding the Corporation's policies and decisions.
(c) Do not give out other employees' or Board members' e-mail addresses, cellular phone numbers or addresses unless authorized to do so.

Nothing contained in this policy is intended to prohibit the disclosure to outsiders of information about the Corporation that is routinely made available to the public by advertisement or otherwise.

Violators of this policy will be subject to disciplinary action, up to and including termination.

III. EMPLOYMENT AT WILL POLICY

All employees of the Corporation who do not have a written employment agreement are employed at the will of the Corporation for an indefinite period. The Corporation's Board of Directors must authorize

all employment contracts. Employees who do not have a written employment agreement with the Corporation are subject to termination at any time, for any lawful reason, with or without cause and with or without notice. Such employees may terminate their employment at any time and for any reason after proper notice.

No representative, except the President, is authorized to modify the employment at will status of any employee or to enter any agreement contrary to this policy. Any such agreement must be in writing and signed by the President and approved by the Board of Directors.

There are no guarantees as to the permanency of employment. Supervisory and management personnel shall not make any representations to employees or applicants concerning the terms or conditions of employment with the Corporation which are not consistent with this policy.

Any statements contained in this policy or in any memoranda shall not modify this policy or other materials provided to employees in connection with their employment. Also, those documents shall not create an express or implied contract of employment for a definite period.

Nothing contained in this manual, memoranda or other materials provided to employees in connection with their employment shall require the Corporation to have "just cause" to terminate an employee or otherwise restrict the Corporation's right to terminate an employee at any time, for any lawful reason, with or without cause and with or without notice. Statements of specific grounds for termination set forth in this policy or elsewhere are not all-inclusive and are not intended to restrict the Corporation's right to terminate at will.

IV. WHISTLEBLOWER POLICY

General. The Corporation requires directors, officers, consultants, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The Corporation strives for honesty and integrity in fulfilling its mission and complies with all applicable laws and regulations.

Reporting Responsibility. It is the responsibility of all directors, officers, and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation. No director, officer, consultant, or employee who in good faith reports an ethics violation shall suffer harassment, retaliation, or adverse employment consequence. An officer, director, consultant, or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Corporation prior to seeking resolution outside the Corporation.

Reporting Violations. The Corporation has an open door policy and suggests that directors, officers, consultants, and employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, the President is in the best position to address an area of concern. However, if you are not comfortable speaking with the President or you are not satisfied with his or her response, you are encouraged to speak with the Corporation's legal counsel or

any other managerial consultant whom you are comfortable in approaching. The President and other managerial consultants are required to report suspected ethics violations to the Corporation's legal counsel, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Corporation's open door policy, individuals should contact the Corporation's legal counsel directly.

Compliance Officer. The Corporation's legal counsel is the organization's Compliance Officer and has the authority to investigate and resolve all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the President and/or the Board of Directors.

Acting in Good Faith. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations. The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

V. ANTITRUST COMPLIANCE POLICY AND GUIDELINES

Introduction and Statement of Policy. The Corporation is an organization of coalition members (collectively, "Members") that promotes the common business interests of its Members in establishing appropriate standards for and otherwise promoting accountability, trust, and transparency in consumer financial tools and products. The Corporation is not intended to and may not play any role in the competitive decisions of its Members (or their employees, affiliates, or partners), or take any act that in any way restricts, limits, or decreases competition in the provision of consumer financial tools and/or products. Accordingly, any activity of the Corporation or its Members that either intentionally or unintentionally reduces or limits competition in any of the areas in which the Corporation's Members compete is contrary to Corporation policy.

It is the policy of the Corporation to fully and strictly comply with both federal and state antitrust laws. Full compliance with the antitrust laws is a requirement for Corporation Members, officers, Directors, and employees, and responsibility for compliance rests with each Member. In order to ensure that Corporation Members, officers, Directors, and employees understand the basic antitrust laws and guidelines for compliance, the Corporation has adopted this Antitrust Compliance Policy and Guidelines ("Antitrust Policy"). Because this Antitrust Policy cannot address every situation with antitrust consequences that may arise, the Corporation advises those confronted with potential antitrust issues to consult with counsel.

Summary of Antitrust Laws and Penalties. Because certain Members of Corporation are competitors, their activity is subject to strict scrutiny under both state and federal antitrust laws. Generally speaking, the antitrust laws prohibit all agreements, combinations, conspiracies, or understandings that unreasonably "restrain trade." Some activities are regarded as unreasonable by their very nature and are thus "illegal per se," which means they are presumed to be unlawful regardless of the purpose or actual anticompetitive effect of the activity. Practices that fall under this category include agreements, understandings, or coordination between competitors to fix prices; boycott certain competitors, customers, or vendors; exclude competitors, customers, or vendors; allocate markets or customers; or limit production, access, or product offerings.

Additionally, the Members' exchange or discussion of Competitively Sensitive Information ("CSI") can potentially violate both the state and federal antitrust laws to the extent it can facilitate improper coordination between parties, or otherwise influence normal competitive behavior. CSI includes (but is not necessarily limited to) non-public information about prices, discounts, allowances, or other terms of sale; customer, supplier and vendor contracts, negotiations, or strategy; detailed cost information; future business plans or strategies; and specific employee wages, salaries, or compensation.

Violations of the antitrust laws carry significant penalties. A violation of antitrust law is a felony punishable by a fine of up to $1 million or ten years of imprisonment (or both) for individuals, and a fine of $100 million for corporations. Additionally, victims of antitrust violations may seek civil recoveries of up to three times the amount of damages actually suffered as a result of the unlawful activity.

It is important for Members, officers, Directors, and employees of the Corporation to understand that a Member of the Corporation (both the individual representative and the company) may be held liable (either criminally or civilly) for an antitrust violation for merely attending a meeting or event during which another Member of the Corporation engaged in an illegal activity, even if such Member was not an active participant in such activity or discussion. Accordingly, it is imperative that each Member act in a manner that is in compliance with the antitrust laws.

Against this background, adhering to the following antitrust guidelines when engaging in all Corporation meetings, activities, or events will help the Corporation reduce any antitrust risks.

Prohibited Activities. Agreements or Joint Conduct: As competitors or potential competitors, Members of the Corporation may not:

(a) Discuss or coordinate the prices at which the Members sell their respective products, or as to any other price or contract term related to the Members' offering or sale of their respective products.
(b) Agree to collectively negotiate with a third party on behalf of individual Members, or otherwise agree as to how to deal with third parties who are involved in the Members' business.
(c) Organize a "boycott" by discussing or agreeing to refuse to deal with any customer, supplier, vendor, or other third party, or otherwise pressure a third party to comply with certain terms or conditions under the threat of such a boycott.
(d) Make joint decisions about any of the Members' business activities, such as the availability of a certain products, the expansion or closure of any retail store locations, or any other business, development, or marketing strategy.

(e) Divide territories or allocate customers among Members for the offering, sale, or availability of products.
(f) Agree not to recruit or hire another Member's employees.
(g) Agree on the wages, benefits, or other terms of compensation offered to the Members' respective employees.
(h) Agree to or adopt any standards or best practices that have the effect of either boycotting or unreasonably excluding certain participants in the market.

Information Sharing. Members may only exchange and share information that is "reasonably necessary" to the purpose and mission of the Corporation, but should not (under any circumstances) exchange any CSI. Members of the Corporation may not:

(a) Exchange or discuss with any other Member any CSI, such as sales or price information, fees, discounts, terms, or conditions of sale; sales, operational, or marketing strategies; target customer demographics; customer, vendor, or supplier contracts, negotiations, or contracting strategy; detailed cost information; detailed financial information, including profit margins, budget projections, or sales forecasts; and specific wage, benefit, or compensation information.
(b) Share or discuss information that would be suggestive or conclusory as to how aMember should deal with any customer, supplier, vendor, or other third party.
(c) Use any information shared by the Corporation for any purpose outside of thepro-competitive purposes and mission of the Corporation.

These Governance Policies were adopted by the Board of Directors on Nov. 16, 2024.