



Supplier Code of Conduct



1. About our Code of Conduct

At Real Matters Inc. (“Real Matters” or the “Company”), our clients include some of the world’s largest, most trusted financial institutions. By choosing to do business with us, they trust that we uphold the highest standards of integrity, accountability, ethical conduct and performance, while observing the laws and regulations that govern our industry. The Real Matters Supplier Code of Conduct (the “Code”) is our commitment to extend those principles to business partners, suppliers and vendors of the Company (collectively “Suppliers”). It sets the expectation that our Suppliers will act with the highest level of integrity, uphold the law, and that they will treat all of our stakeholders, and each other, with respect and transparency. It also ensures that our Suppliers behave in a way that safeguards Real Matters’ reputation and the trust that our investors, clients, business partners, regulators and communities place in our Company.

All Suppliers who engage with Real Matters Inc., including any of our direct or indirect subsidiaries (collectively, the “Company”), have a duty to demonstrate the highest standard of business conduct.

As a Supplier to the Company you are required to read the Supplier Code of Conduct and to adhere to its principles as a condition of your engagement with the Company.

2. Creating a Positive Work Environment

The Company is committed to providing a positive work environment that is free of all forms of harassment, violence and discrimination. As a Supplier, you have an obligation to treat our employees, clients, the public and all of our stakeholders with dignity and respect.

Diversity and Inclusion

The Company strives to create an environment that is diverse and inclusive. Diversity includes, but is not limited to, differences in race, national or ethnic origin, culture, language, socioeconomic background, religious or political belief, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics, disability, military or veteran status, and other categories protected under applicable laws. Diversity also includes differences in experiences, perspectives, thoughts, interests, and ideas. Inclusion means ensuring that all Suppliers and Employees are valued, heard, engaged, and involved and have full opportunities to collaborate, contribute, and grow professionally. Our people are the Company’s most valuable asset. The collective sum of our differences is a significant part of our culture.

We do not tolerate any harassment, violence or discrimination against Employees. If an Employee reports any kind of harassment, violence or discrimination, the Company will conduct a full investigation of the matter, regardless of whether the perpetrator is a co-worker, business partner, client or the public.

Similarly, the Company requires all Suppliers and its Employees to engage with its clients, vendors, consumers, and business partners in a professional manner and prohibits Suppliers and Employees from harassing, acting violently towards or discriminating against such parties.

The Company will not work with a client or Supplier that violates the basic principles outlined in this “Creating a Positive Work Environment” section.

Health and Safety

The Company is committed to providing a safe and healthy working environment for all employees in accordance with all applicable laws and regulations.

Workplace health and safety is of critical importance to the Company. As such, the Company and its management will:

- make reasonable provisions for the occupational health and safety of its employees in accordance with the applicable laws of the jurisdictions in which the Company operates;
- keep employees familiar with safe work practices through training or other communication as required from time-to-time;
- identify and notify employees of any hazardous workplace conditions and provide reasonable preventative measures to protect employees from these hazardous conditions; and
- establish and maintain a procedure and protocol to be followed in the case of serious injury or fatality.

Suppliers have a duty to:

- strictly comply with directives, approved work procedures and all applicable laws or regulations intended to ensure their health and safety;
- advise the Company in a timely manner of any dangerous, threatening or hazardous workplace conditions; and
- refrain from any conduct or misconduct that they know or reasonably ought to know is dangerous or threatening to their own health and safety or to that of others within the workplace.

While visiting Company facilities, smoking is allowed only in designated areas.

Substance Abuse and Weapons

Suppliers are not permitted to manufacture, distribute, possess, sell or attempt to sell, receive or be under the influence of legal or illegal substances that cause them to be impaired at our worksites or when representing the Company.

We need to rely on our Suppliers to exercise good judgment and never drink, consume, or otherwise use a substance that may cause impairment in a way that leads to impaired performance or inappropriate behaviour, endangers the safety of others or violates the law when providing services to the Company.

The Company is also committed to a violence-free work environment and will not tolerate any level of violence or threat of violence in the workplace. All of our Suppliers are strictly prohibited from bringing to or storing a weapon at our worksites. If you become aware of a violation of this

policy related to substance abuse or weapons, please report it immediately to compliance@solidifi.com.

3. Avoiding Conflicts of Interest

You have an ongoing responsibility to identify conflicts of interest in relation to the Company and the services you provide. You must disclose actual, potential or perceived conflicts so they can be avoided or managed appropriately.

Anti-Bribery

The Company conducts its business based solely on objective, prudent business practices. We choose our business partners (including suppliers) objectively based on quality, competence, performance and ethics.

You may not give cash or cash equivalents to any of our employees or board members, in an attempt to influence an individual's actions or decisions as a means of obtaining business opportunities with the Company. In addition, you may not give gifts of material value in an attempt to influence an individual's actions or decisions as a means of obtaining business opportunities with the Company, save and except for gifts given in the ordinary course of business and in line with customary business practice.

Related Party Transactions

For purposes of the Code, "Related Party" includes a spouse, domestic partner, parent, grandparent, sibling, child, grandchild, step-parent, step-grandparent, stepsibling, step-child, step-grandchild or in-law.

Avoiding potential conflicts of interest also means that you should not use or provide the Company products or services in a way that improperly benefits you or a Related Party. Therefore, you are required to report to the Company the fact that you or a Related Party is or was within the past two years an employee of the Company prior to providing products or services as a Supplier of the Company.

4. Preserving Confidentiality

Through your engagement with the Company, you may be provided with or receive or have access to proprietary and confidential information, which includes information related to the Company's past, present or future products, software, research and development, initiatives, information security, clients, vendors, consumers, business partners, financial performance, strategy, and/or administrative activities. You may also receive or have access to third-party confidential or proprietary information, including information about a client's customers. The Company considers this information, including any materials or documents containing the information, to be confidential and proprietary.

It is your duty to comply with all obligations set out in your Supplier agreement relating to the protection of confidential information. You shall protect confidential information and take

precautions before sharing it with anyone, internally or externally. Do not share confidential information with friends, family or co-workers who do not have a legitimate business “need to know”, and do not discuss it in places where others could hear you (e.g. elevators, airplanes, public places, etc.). You should always properly label, secure and dispose of confidential information in accordance with Company policies and procedures. Do not access, disclose or store confidential information unless you have been specifically authorized by the Company to do so.

If you are unsure whether the information you have is confidential, the best practice is to assume that all information you have about the Company and its business, including information received from past and current business partners, vendors, clients and their customers is confidential.

In the event you become aware that confidential information was intentionally or accidentally released, you must immediately report the incident to the Company’s Chief Privacy Officer at privacy@solidifi.com.

5. Obeying the Law and Ensuring Financial Integrity

The Company operates in a highly regulated industry. It is incumbent upon all of us to be aware of and to comply with the laws and regulations that govern our industry. This is critical to our business and to maintaining the confidence of our clients, business partners, vendors and regulators.

As a Supplier, you are expected to know and comply with the laws and regulations that apply to you.

Obligation to Report

As a Supplier, you are required to promptly report any of the following incidents to the Company, regardless of whether they relate to the business of the Company or its clients:

- any arrests, charges or convictions laid upon you for theft, dishonesty, fraud or other financial crimes, assault, crimes against property, major drug offences (including manufacturing, smuggling or trafficking);
- the receipt of any subpoenas, regulatory requests, media inquiries, or other third party requests concerning the Company or its clients;
- any concerns or suspected violations of any law or regulation related to the Company or its clients or a violation of this Supplier Code of Conduct or any other Company policy, including fraud, dishonesty, unfair or unethical conduct related to financial services, whether it is by Supplier’s team, a Company employee, or another third party supplier; and
- any inquiry or enforcement action against you by a regulator with which you hold a professional license.

These incidents may be reported to the Company by contacting its Compliance Department at compliance@solidifi.com or 877-240-6310.

The Company strictly prohibits intimidation or retaliation against anyone who makes a good faith report about a known or suspected violation of the Supplier Code of Conduct or any law or regulation.

Insider Trading

The Company is committed to candid communications and transparency which is why we openly share information internally. As a Supplier, you may become aware of confidential information about the Company or our clients, often called material non-public information (MNPI). Examples of MNPI include, but are not limited to: material information about financial performance, new products or services, new, existing or potential clients, proposed acquisitions, joint ventures or disposition, changes in key personal, lawsuits or regulatory investigations. MNPI is information that is not available to the public, and if disclosed would reasonably be expected to have a significant effect on the market price or value of the Company's shares.

Suppliers are prohibited from disclosing MNPI, using it to buy or sell securities (also known as "insider trading"), or sharing it with others (also known as "tipping"). If you are unsure if information is MNPI, please speak with our Legal Department. Insider trading is not only a violation of our Code, it is illegal.

6. Contact Information

- Legal and General Counsel: corporatelegal@solidifi.com
- Compliance: compliance@solidifi.com
- Security: security@solidifi.com
- Privacy: privacy@solidifi.com
- Investor Relations and Corporate Communications: ir@realmatters.com
- Third-Party Ethics Helpline: www.lighthouse-services.com/realmatters or 844-420-0055.

Acknowledgement

Receipt of Supplier Code of Conduct Acknowledgement Statement

- I acknowledge that I have received a copy of the Company's Supplier Code of Conduct dated May 2021 (the "Code"). I understand that this version replaces any and all prior verbal and written versions.
- I have read and understand the principles and standards of conduct contained in the Code.
- I will adhere to and comply with the Code's principles and standards. I am presently unaware of any violation of this Code that I have not reported, as required.

Supplier Name

Supplier Signature

Date