



Supplier Code of Conduct

May 2023





Vision

To empower incredibly smart decisions



Mission

We make the homeownership
experience extraordinary

Values



ONE TEAM

We are one team with one goal.

There is no limit to what we can accomplish together.



THINK BIG

We challenge our ideas of what's possible.

We plan and build for the long term.



OWN IT

We deliver and exceed expectations. We take initiative, are accountable and keep our commitments to each other, our partners and customers.



ELEVATE OTHERS

We are respectful and inclusive.

We value each other's time, views and contributions.



PASSION TO WIN

We are passionate and determined to win.

Our optimism and collaborative spirit ignites innovation.

ESG Areas of Focus



Empowering Economic Growth and
Prosperity through Home Ownership



Elevating our People
and Communities



Building Trust and Acting
with Integrity



Protecting the Environment

EMPOWERING INCREDIBLY SMART DECISIONS

At Real Matters, empowering incredibly smart decisions isn't just about helping our clients, it's about our culture, how we conduct business and the principles we bring to work every day.

Guided by our vision and mission, we strive to make a positive impact by: empowering economic growth and prosperity through home ownership, elevating our people and communities, building trust and acting with integrity, and protecting the environment. These four pillars reflect our commitment to sustainability while creating value for all of our stakeholders, including our clients, their customers, our vendors and business partners, as well as our colleagues and investors.

Building Trust and Acting with Integrity

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 is our commitment to those principles. It sets the expectation that we will act with the highest level of integrity, uphold the law, and that we will treat all of our stakeholders, and each other, with respect and transparency. It also ensures that we 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.

As a supplier of Real Matters or one of its direct or indirect subsidiaries, you are responsible for understanding and complying with our Supplier Code of Conduct, not by just following its guidelines but by always exercising good judgment and adhering to our values.

Empowering incredibly smart decisions starts with you.

Brian Lang
Chief Executive Officer, Real Matters
May 2023

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1. About our Code of Conduct

All business partners, suppliers and vendors (collectively, "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 (the "Code") and to adhere to its principles as a condition of your engagement with the Company. You are also required to report to the individuals identified in this Code any known or suspected violation of the Code, the Company's policies, applicable laws and regulations, and any criminal activity, whether or not it involves you.

2. Creating a Positive Work Environment

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.

For purposes of the Code, "work environment" means any work performed at the Company's offices, at your office and/or any other location where you are representing the Company. All Suppliers are expected to exhibit conduct that reflects inclusion while representing the Company.

Ethical Operations

The Company abides by all applicable employment laws and international standards such as the principles set forth by the United Nations and the International Labour Organization's Fundamental Conventions. The Company is committed to upholding human rights and fostering a responsible and fair work environment. The Company will not tolerate or allow any unethical business practices such as servitude, forced labour, child labour and/or human trafficking.

Social Responsibility

The Company is a committed equal opportunity employer and abides by all applicable fair labour practices, including, but not limited to, complying with all applicable employment and human rights laws. The Company encourages Supplier involvement within the community, through charitable activity and being an active participant in community associations.

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 Company employees ("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 detailed 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 Employees to engage with its clients, vendors, consumers, business partners and others 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:

- take reasonable measures to ensure the occupational health and safety of its Employees in compliance with the applicable laws of the jurisdictions in which the Company operates;
- keep Employees familiar with safe work practices through training and other communication as appropriate from time-to-time;
- identify and notify Employees of any hazardous workplace conditions and take 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 all applicable laws and regulations
- strictly comply with directives and approved work procedures communicated to you which are 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, when providing services to the Company, 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.

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 a weapon to our worksites or to any other site while representing the Company.

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 to compliance@solidifi.com 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 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 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 or that gives the appearance of improperly benefitting 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 receive or have access to proprietary and confidential information, which includes, but is not limited to, information related to the Company's products, software, research and development, initiatives, information security, pricing, clients, vendors business partners, Employees, financial performance, strategy, and/or administrative activities. You may also receive or have access to third-party confidential or proprietary information, including, but not limited to, information about a client's customers. The Company considers all such information, including any materials or documents containing such 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 or the Company's Chief Information Security Officer at security@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 all applicable laws and regulations. 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 to comply with, the laws and regulations that apply to you and your engagement with the Company.

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 or 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 allegations, concerns or suspected violations of any law or regulation related to you, your services, the Company or its clients, including such allegations, concerns or suspected violations pertaining to discrimination, fraud, dishonesty, unfair or unethical conduct;
- any violation of this Code or any other Company policy whether it is by you, a member of your team, an Employee, a Company client or consumer or another third party supplier;
- any complaint, investigation, inquiry or enforcement action against you by a federal or state regulator.

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 Code 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 dispositions, changes in key personnel, 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 contact our Legal Department at corporatelegal@solidifi.com. Insider trading is not only a violation of our Code, it is illegal.

6. Speaking Up and Raising Concerns

The Company promotes an ethical culture where you are encouraged to speak up. While our Code and policies outline the ethical behaviour we expect of Supplier, they cannot anticipate every situation we encounter. By speaking up and raising concerns, we ensure that the Company does the right thing to protect all of our stakeholders and the Company's reputation.

Reporting Misconduct

You have a duty to report actual or suspected misconduct. This includes violations of the Code, Company policies or the law. You can report your concerns to the Company's Compliance Department at compliance@solidifi.com or anonymously through our Ethics and Compliance Helpline at www.lighthouse-services.com/realmatters or by calling 844-420-0055.

No Retaliation

The Company prohibits retaliation against anyone who reports or participates in an investigation of a possible violation of our Code. Any reports of suspected or known violations made in good faith, whether reported through the third-party whistleblower service or directly to the Company, will be handled discreetly and without retaliation.

7. Contact Information

- Legal and General Counsel: corporatelegal@solidifi.com
- Compliance: compliance@solidifi.com
- Security: security@solidifi.com
- Privacy: privacy@solidifi.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 2023 (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