



# Supplier Code of Conduct

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April 2022





## Vision

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To empower incredibly smart decisions



## Mission

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We make the homeownership  
experience extraordinary

## Values

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### 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.

# 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.

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 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 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  
April 2022

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## 1. About our Code of Conduct

The Real Matters Supplier Code of Conduct (the "Code") is our commitment to extend our key principles to all of our business partners, suppliers and vendors (collectively "Suppliers"). The Code applies to all Suppliers who engage with Real Matters Inc. including any of its direct or indirect subsidiaries (collectively, the "Company"). All Suppliers of 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. You are also required to report any known or suspected violations 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 location where you are 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, and expects all of its Suppliers to be, a committed equal opportunity employer that 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 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 our 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, Supplier, client or the public.

Similarly, the Company requires all Suppliers and their employees to engage with its clients, vendors, consumers, and business partners in a professional manner and prohibits Suppliers and their 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 and 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.

### **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 a weapon to our worksites or any other location when representing the Company. If you become aware of a violation of this policy related to substance abuse or weapons, please report it immediately to [compliance@solidifi.com](mailto:compliance@solidifi.com).

### **3. Avoiding Conflicts of Interest**

In connection with your engagement with the Company, 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 the Company 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, step-sibling, 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 to you. Therefore, you are required to report to the Company the fact that you or a Related Party to you 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, receive or have access to, proprietary and/or confidential information, which includes, but is not limited to, information related to the Company's past, present or future products, services, software, research and development initiatives, information security, pricing, 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, but not limited to, 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. In addition, 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 Suppliers, 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 Real Matters' Chief Privacy Officer at [privacy@solidifi.com](mailto: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, Suppliers 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, should they occur during the course of your engagement with 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](mailto:compliance@solidifi.com) or 877-240-6310.

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

### Insider Trading

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 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](mailto:corporatelegal@solidifi.com)
- Compliance: [compliance@solidifi.com](mailto:compliance@solidifi.com)
- Security: [security@solidifi.com](mailto:security@solidifi.com)
- Privacy: [privacy@solidifi.com](mailto:privacy@solidifi.com)
- Investor Relations and Corporate Communications: [ir@realmatters.com](mailto:ir@realmatters.com)
- Third-Party Ethics Helpline: [www.lighthouse-services.com/realmatters](http://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 April 2022 (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.

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**Supplier Name**

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**Supplier Signature**

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**Date**