



# Supplier Code of Conduct

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May 2024





## 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.

# ESG Areas of Focus

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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, vendors, 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 2024

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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 creating a positive work environment that is diverse, equitable and inclusive and free of all forms of harassment, violence and discrimination. In addition, the Company is committed to respecting and promoting human rights throughout its organization and in its business relationships with clients and Suppliers. As a Supplier, you have an obligation to treat all of the Company's employees, clients, other stakeholders and the public 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.

The Company will not work with a Supplier that violates the principles outlined in this "Creating a Positive Work Environment" section.

### Ethical Operations

The Company requires its Suppliers to comply with all applicable employment laws and to commit to upholding reasonable working conditions, including working hours, and providing a fair and living wage to all employees. Suppliers must recognize the basic rights of freedom of association and the right for employees to join, assist and seek representation from labour unions and workers' councils and to bargain collectively in accordance with applicable laws without fear of reprisal, intimidation or harassment.

In addition, the Company expects its Suppliers to seek to abide by internationally recognized human rights and labour standards such as the principles set forth in the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

The Company will not tolerate or allow any unethical business practices such as bribery, corruption, modern slavery, servitude, forced labour, child labour and/or human trafficking and requires the business operations of its Suppliers to be free from these practices. In addition, the Company does not assist, support, participate in or permit money laundering or terrorist financing, nor does it permit any of its Suppliers to engage in these practices. Suppliers are required to promptly report any unethical business practices or unusual or suspicious activities that could be indicative of fraud, money laundering, terrorist financing or other financial crimes.

### **Fair Competition**

The Company requires Suppliers to conduct business activities in a manner that supports fair and open competition, utilizing honest and transparent business practices that comply with competition and anti-trust laws. Suppliers are prohibited from engaging in or appearing to engage in any anticompetitive conduct in violation of applicable laws that could unfairly exclude or reduce competition in any market. Suppliers must not enter into any business arrangement related to the services it provides to the Company whereby it eliminates or discourages competition or confers an inappropriate competitive advantage on the Supplier. Prohibited activities include, but are not limited to, price fixing or price signalling, bid rigging, illegal market sharing, abuse of market power and predatory pricing.

### **Social Responsibility**

The Company encourages Supplier involvement within the community, through charitable activity and being an active participant in community associations.

### **Diversity, Equity and Inclusion**

The Company strives to create an environment that is diverse, equitable 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 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. The Company is a committed equal opportunity employer to all individuals, including historically marginalized groups. All Suppliers are responsible for supporting the concept of inclusiveness and equal opportunity and assisting the Company in meeting its objectives.

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, Supplier, client or the public.

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

## **Health and Safety**

The Company is committed to providing a safe and healthy work environment in accordance with all applicable health and safety laws and regulations.

Workplace health and safety is of critical importance to the Company. As such, Suppliers have a duty to:

- strictly comply with all applicable occupational health and safety laws and regulations;
- strictly comply with directives and approved work procedures communicated to you which are intended to ensure 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 you know or reasonably ought to know is dangerous or threatening to your 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, at a Company-sponsored event or any other location when representing the Company.

The Company relies on its Suppliers to exercise good judgment and, when providing services to, or on behalf of, the Company, to 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, to a Company-sponsored event or to any other site while representing the Company. If you become aware of a violation of this policy related to substance abuse or weapons, please report it immediately.



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

Suppliers have an ongoing responsibility to identify conflicts of interest in relation to the Company and the services provided to the Company. You must disclose actual, potential or perceived conflicts to the Compliance team at [compliance@solidifi.com](mailto:compliance@solidifi.com) so they can be avoided or managed appropriately.

#### **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.

#### **Entertainment and Gifts**

Gift-giving and entertainment are common business practices, however, Suppliers are responsible for ensuring these practices do not improperly influence or otherwise create the appearance of improperly influencing business decisions. Any gift-giving or entertainment provided by a Supplier to Employees must be: provided in good faith; transparent; reasonable and customary under the circumstances; and provided without the intent or prospect of influencing decision-making or obtaining any improper or undue advantage. The Company conducts its business based solely on objective, prudent business practices. We choose Suppliers objectively based on quality, competence, performance and ethics.

#### **Anti-Bribery and Corruption**

In connection with the services provided to the Company, Suppliers must not give or accept gifts of any kind to or from any officer, employee or representative of a government or regulatory body or individual known to be a Related Party to such individual, including regulators, candidates for public office, employees of a government agency, political party officials or employees of foreign governments or government controlled organizations, without prior approval from the Company's Legal team. This includes things like meals (outside the normal course of business), travel, political or charitable donations and job offers. Bribes, corruption or illegal kick-backs as a means of obtaining business opportunities are also strictly prohibited.

In certain jurisdictions, public officials may request small payments, known as facilitation payments, to expedite or secure the performance of a routine governmental action such as issuing permits, licenses or other official documents, processing government papers or providing customs

clearances. Facilitation payments, however, are a form of bribery. Suppliers must never pay, or authorize the payment of, facilitation payments in connection with the services being provided to Company. If you are asked to make a facilitation payment, you must not pay and inform the Company's Legal and Compliance teams immediately.

## 4. Preserving Confidentiality

### 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, Suppliers, 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.).

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 or suspect that confidential information was intentionally or accidentally disclosed to, or accessed by, an unauthorized party, you must immediately report the incident to the Company's Chief Privacy Officer at [privacy@solidifi.com](mailto:privacy@solidifi.com) and/or the Company's Chief Information Security Officer at [security@solidifi.com](mailto:security@solidifi.com).

### Information Security

Maintaining the highest level of vigilance over the protection of confidential and/or proprietary information and data is essential to maintaining the trust of our clients, their customers, our regulators and the public.

In addition to complying with any contractual obligations to which you are bound, at a minimum, Suppliers are required to maintain commercially reasonable measures to protect confidential

and/or proprietary information, including, but not limited to, ensuring that all passwords used by you to access any Company system are strong and unique and not shared with anyone for any reason. The Company expects all Suppliers to be vigilant and to follow best practices when it comes to their own cyber security.

Should you have questions regarding information protection, please contact the Company's information security team at [security@solidifi.com](mailto: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, their customers, our regulators and the public.

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's Compliance team, regardless of whether they relate to the business of the Company or its clients:

- any arrest(s), charge(s) or conviction(s) 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 lawsuits, complaints, allegations, concerns or suspected violations of any law or regulation related to you, your services, the Company or its clients, including such lawsuits, complaints, 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, a consumer or a third party; and
- 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](mailto:compliance@solidifi.com).

### 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 its 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](mailto: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 Suppliers, they cannot anticipate every situation you or the Company may encounter. By speaking up and raising concerns, we ensure that the Company does the right thing to protect all of its stakeholders and the Company's reputation.

### **Reporting Misconduct**

You have a duty to report actual or suspected misconduct. This includes any violations of the Code, Company policies and/or the law. You can report your concerns to the Company's Compliance Department at [compliance@solidifi.com](mailto:compliance@solidifi.com). Alternatively, if you are not comfortable directing concerns to the Company's Compliance Department, you can report your concern anonymously through the Company's Ethics and Compliance Helpline at [www.lighthouseservices.com/realmatters](http://www.lighthouseservices.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 the 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.

### **Waivers of the Code**

If you would like to seek a waiver of any portion of this Code, you must make full disclosure of your particular circumstances in writing to the Company's Legal Department.

## 7. 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)
- Third-Party Ethics Helpline: [www.lighthouse-services.com/realmatters](http://www.lighthouse-services.com/realmatters) or 844-420-0055.

