



Employee Handbook



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WELCOME

Welcome to CCM! We appreciate you selecting CCM as your employer of choice and thank you for joining a team of champions. It's our employees hard work and achievements that direct our success. We've been boldly breaking the mold to create new solutions and innovations that redefine how we live and work.

The position that you are filling is an important part of a team of people whose purpose and need is to produce the highest quality products in our industry. Achieving the high level of quality requires the full commitment of all employees. CrossCountry Mortgage ("CCM" or the "Company") is dependent upon the skills, experience and commitment, which you and our other employees bring to their position.

This Handbook is a summary of our policies, procedures and guidelines, which are the philosophies and principles that guide us. It has much valuable information about your role. Read it carefully, become familiar with its content and keep it available as a reference when you have questions. The CrossCountry Mortgage, LLC Employee Handbook is available on the CCM ADP Homepage and CCM Intranet "The Landing", Employee Center Homepage, it is important that you familiarize yourself with the contents of the Employee Handbook.

Best to you in your new career with us and my sincere best wishes for years of a satisfying and successful experience.

Sincerely,

Ron Leonhardt
CEO & President

HANDBOOK RULES AND REGULATIONS

This Handbook is your guide to CrossCountry Mortgage's policies and philosophies as well as regulations that govern us at work. These policies were developed to exert a positive influence on our day to day relationships and to ensure that rules and policies are uniformly applied throughout our operation.

None of the benefits or policies in this Handbook are intended by reason of their publication to confer any right or privileges or to entitle you to be or remain employed by the company.

CrossCountry Mortgage relies upon the accuracy of information contained in the employment application, as well as the accuracy of other data presented throughout the hiring process and employment. Any misrepresentations, falsifications, or material omissions in any of this information or data will result in your exclusion from further consideration for employment or, if you have been hired, termination of employment.

The contents of this Handbook are presented as a matter of information only. While the company believes wholeheartedly in the plans, policies and procedures described here, they are not conditions of employment and are subject to unilateral change by the company at any time.

This Handbook is designed as a guideline to our employees, not as a contract. As we grow together and share each other's ideas, the Handbook will be updated.

This Handbook cannot provide all the details on any given subject. You need to direct any questions you might have to your manager or to the Executive Vice President of Human Resources.

Your employment at CrossCountry Mortgage is at-will, meaning that it is for no definite period and may, regardless of the time and manner of payment of wages and salary, be terminated at any time by the company or by the employee with or without cause and without any previous notice. Further, no employee of this company, including management and supervisory personnel, other than the President, has the authority to enter into an agreement for employment for any specified period of time or to make any such agreement contrary to the foregoing. Any such agreement with the President must be in writing and signed by the President. This lack of guarantee or employment contract also applies to other benefits, working conditions, and privileges of employment at CrossCountry Mortgage.

While we hope your employment with the company will be long lasting, employees are, of course, free to resign at any time just as the company is free to terminate your employment at any time.

CrossCountry Mortgage is an equal opportunity employer and will maintain the policy of nondiscrimination with all employees and applicants for employment. All aspects of employment with us will be governed on the basis of merit, competence and qualifications and will not be influenced in any manner by race, color, religion, sex, age, national origin, disability or any other basis prohibited by law.

All decisions made with respect to recruiting, hiring and promotions for all jobs will be based solely on individual qualifications related to the requirements of the position. Likewise, all other personnel matters such as compensation, benefits, transfers, reduction in workforce, recall, training, educational and social/recreation programs will be administered free from any illegal discrimination practices.

CrossCountry Mortgage also provides all employees the right to a work environment free from intimidation and harassment because of their actual or perceived sex, sexual orientation or preference, gender identity, gender, transgender, age, color, national origin, race or any other legally protected characteristic. Infractions of this policy should be reported to your direct manager. In the case the infraction is made by your own manager you need to report the violation to your manager's manager or the Executive Vice President of Human Resources.

EMPLOYEE COMMUNICATION

A. ABOUT THIS HANDBOOK

To best accomplish our mission, we must effectively engage our available resources, including the most important of these: our skilled and dedicated employees. Because employment conditions have a direct importance on performance and job satisfaction, we believe that sound, well-defined human resource practices are imperative for maintaining a high level of professional services. These principles have guided us in developing this Employee Handbook that describes the conditions, responsibilities, and benefits of employment with CrossCountry Mortgage.

We developed this Employee Handbook to describe our expectations and many of your responsibilities as our employee, to acquaint you with CrossCountry Mortgage, and to provide you with information about working conditions, employee benefits, and policies affecting your employment. You must read and understand the contents of this Handbook as soon as possible so you can fully comply with its provisions and have a source for answers to many questions about employment with CCM.

Human Resources is responsible for the daily administration of the policies described in this Handbook. No employee and/or manager, other than the President of CrossCountry Mortgage, has the authority to make any agreement contrary to the policies described in the Handbook. All modifications will be in writing and posted on the CCM ADP Homepage and CCM Intranet “The Landing”, Employee Center Homepage.

No Employee Handbook can anticipate every circumstance or question about policy. As the Company continues to grow, the need may arise to change policies described in this Employee Handbook. CrossCountry Mortgage, therefore, reserves the right to revise, supplement, or rescind any policy or portion of the Handbook from time to time as it deems appropriate, in its sole and absolute discretion. Any such action shall apply to existing as well as to future employees. We will make every reasonable attempt to notify employees of changes in policies and procedures. An employee needs to confirm the status of a policy or practice before acting on it.

Any provision in this Employee Handbook be found to be unenforceable and invalid, such finding does not invalidate the entire Employee Handbook, but only that particular provision.

Any questions concerning this Handbook or its proper implementation may be addressed with the Executive Vice President of Human Resources.

B. OPEN-DOOR POLICY

In accordance with our Employee Handbook, CCM encourages open communication between employees and all levels of management. We are committed to employees by responding effectively to employee's concerns. Employees are expected to approach their work with good conduct, including a willingness to cooperate with co-workers, managers, and clients, in a professional, respectful, polite, and courteous manner. Employees are free to voice any concerns or suggestions they may have regarding personnel issues, CrossCountry Mortgage policies and procedures, workplace improvements, or enhanced services to customers without fear of retaliation. While the appropriate line of communication is customarily to your manager, at times, employees may be concerned about a situation or a problem. If this is ever the case, we strongly suggest communicating these concerns to the Executive Vice President of Human Resources. Our experience has shown that when managers and employees communicate effectively, the work environment is excellent, conduct is positive, and our mission is advanced.

C. NO RETALIATION POLICY

CrossCountry Mortgage will not retaliate against any employee for filing a good faith complaint or for cooperating in the investigation of a complaint and will not permit retaliation by anyone employed by CrossCountry Mortgage against the complaining employee. Any employee found to have retaliated against a complaining employee will be subject to disciplinary action, up to and including termination.

CrossCountry Mortgage encourages all employees to report immediately any unlawful acts of discrimination, harassment, or unethical behavior forbidden by policy so that such incidents can be quickly and fairly resolved.

EMPLOYMENT POLICIES

A. NATURE OF EMPLOYMENT – AT WILL STATUS

Because employees voluntarily enter employment with CrossCountry Mortgage, an employee is free to resign at any time, with or without notice or cause. Similarly, CrossCountry Mortgage may terminate the employment relationship at any time, with or without notice or cause, given compliance to applicable federal or state law.

The Employee Handbook is not and shall not be construed as a contract or creating a contract guaranteeing employment for any specific duration, nor does it constitute an agreement between the employee and CrossCountry Mortgage, expressed or implied of continued employment.

No employee of CrossCountry Mortgage can enter into an employment contract for a specified period of time, or make any agreement contrary to this policy, unless such agreement is in writing and signed by the affected employee and the President.

B. EQUAL EMPLOYMENT OPPORTUNITY

In order to provide equal employment and advancement opportunities, employment decisions at CrossCountry Mortgage are based on merit, qualifications, and abilities. CrossCountry Mortgage does not discriminate on the basis of race, color, religion, religious creed,¹ age, sex (which includes breastfeeding or a medical condition relating to breastfeeding)², sexual orientation, gender identity, gender expression, transgender status, national origin, ancestry, citizenship status, military status, veteran status, marital status, registered domestic partner status, pregnancy, medical condition, physical disability, mental disability, genetic characteristics, genetic information, status as a victim of domestic violence, or any other protected status in accordance with all applicable federal, state and local laws. It is the responsibility of all employees to ensure that these principles and practices are consistently in place.

This policy governs all aspects of employment, including selection, job assignment, compensation, promotion, discipline, termination, transfer, and access to benefits and training. Each person responsible for any of these functions is responsible for ensuring that all equal opportunity policies and practices are followed. The President also assumes responsibility as the equal employment opportunity officer for CrossCountry Mortgage.

Employees who believe they have been subjected to any kind of discrimination that violates the company's Equal Employment Opportunity Policy, must report it immediately to Employee's manager, the Executive Vice President of Human Resources, and/or the Legal Department. All managers must report any complaints of discrimination to the Executive Vice President of Human Resources, so the

¹ The term "religion" or "religious creed" refers to an employee's religious dress and grooming practices as part of that individual's religious observances or beliefs.

² The term "gender identity" refers to a person's deeply-felt internal sense of being male or female, regardless of actual gender. The term "gender expression" refers to a person's behavior or mannerisms or appearance that is perceived as masculine or feminine.

Company may conduct a thorough investigation. CrossCountry Mortgage takes all complaints and concerns seriously, which will be handled promptly. If the concern is about a manager, or if it seems more appropriate to the employee, he or she may contact the Executive Vice President of Human Resources. Employees can raise concerns, make reports or participate in an investigation without fear of reprisal or retaliation of any kind. Anyone found to be engaging in any type of unlawful discrimination or retaliation will be subject to disciplinary action, up to and including termination of employment.

Additionally, CrossCountry Mortgage is committed to fostering, cultivating and preserving a culture that welcomes diversity and inclusion. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation.

CrossCountry Mortgage encourages a work environment that embodies:

- Professional communication and cooperation.
- Teamwork and employee participation, to gain perspective from a variety of employees and employee groups.
- Work/life balance.

Further, all employees of CrossCountry Mortgage have a responsibility to treat others with dignity and respect at all times. Also, all employees are expected to conduct themselves professionally and in keeping with our policies while at work, on Company business, at work-related functions on or off the work site, and at all other company-sponsored events.

C. EMPLOYMENT OF MINORS

The federal government and the various state governments place many restrictions on the type of work that those under the age of 18, minors, may perform. Additionally, there are various restrictions concerning the hours during which minors may be employed. As a result, CrossCountry will not employ anyone under the age of 18 in any capacity, either on a part-time or a full-time basis, paid or unpaid.

D. IMMIGRATION LAW COMPLIANCE

In compliance with the Immigration Reform and Control Act of 1986, CrossCountry Mortgage employs only those individuals who are authorized to work in the United States. We treat all qualified, eligible job applicants equally and do not unlawfully discriminate on the basis of citizenship or national origin, or any other protected characteristic. All offers of employment are conditioned upon receipt of satisfactory evidence of an employee's identity and legal authority to work in the United States.

To verify the identity and employment eligibility of every employee hired, CrossCountry Mortgage requires each new employee to complete an Employment Eligibility Verification Form (Form I-9). Former employees who are rehired must also complete the form if they have not completed an I-9 with CrossCountry Mortgage within the past three years, or if their previous I-9 is no longer retained

or valid. CrossCountry Mortgage may also update I-9s for employees who hold temporary visas or work permits.

Employees with questions or seeking more information on immigration law issues are encouraged to contact Human Resources.

E. DISABILITY ACCOMMODATION

We are committed to complying fully with the Americans with Disabilities Act (ADA), and all other applicable federal, state and local laws, and ensuring equal opportunity in employment for qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis.

Hiring procedures have been reviewed and provide persons with disabilities meaningful employment opportunities. Pre-employment inquiries are made only regarding an applicant's ability to perform the duties of the specific position. Post-offer medical examinations are required only for those positions in which there is a bona fide job-related physical requirement and, if given, will be required of all persons entering the position, but only after conditional job offers. Medical records and information will be kept separate and confidential.

In accordance with the ADA, CrossCountry Mortgage will make reasonable accommodations for qualified individuals with known disabilities unless doing so would result in an undue hardship to CrossCountry Mortgage. This policy governs all aspects of employment, including recruitment, hiring, training, promotion, transfers, compensation, and benefits. A reasonable accommodation is available to all employees whose disability affects the performance of job functions. All employment decisions are based on the merits of the situation in accordance with defined criteria, not the disability of the individual.

Qualified individuals with disabilities are entitled to equal pay and other forms of compensation (or changes in compensation) as well as in job assignments, classifications, organizational structures and position descriptions. Leaves of all types will be available to all employees on an equal basis, subject to qualifications. We are also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. We will follow any state or local law that provides individuals with disabilities greater protection than the ADA.

This policy is neither exhaustive nor exclusive. We are committed to taking all other actions necessary to ensure equal employment opportunity for persons with disabilities in accordance with the ADA and all other applicable federal, state, and local laws.

The Human Resources department is responsible for implementing this policy, including the interactive process and resolution of reasonable accommodation, safety/direct threat, and undue hardship issues. Contact Human Resources at HumanResourcesTeam@ccm.com for any questions or more information about this policy.

F. INTRODUCTORY PERIOD

As a new employee, your performance will be monitored and assessed, and training will be provided, as required. Your continued employment will be based on satisfactory overall performance during an initial 90-day introductory period. As a new employee, you will not be entitled to most fringe benefits for your first ninety (90) calendar days, the length of the introductory period. Once you satisfactorily complete the introductory period, you are expected to continue to properly perform your assigned job duties in order to maintain employment. While the introductory period normally lasts 90 days, it may be extended at the discretion of management. This introductory period is not intended to, nor does it, alter the at-will status of your employment.

G. OUTSIDE EMPLOYMENT

To continue an effective operation, we need your best efforts as an employee. In our opinion, a full-time job with our Company is your primary responsibility. Therefore, any work you do outside your working hours must not interfere or compete with your job here. If your performance is being affected, you may be subject to disciplinary action up to termination. Outside employment that poses a conflict of interest is not permitted, and as such any employee who works for a competitive company or in direct competition with CrossCountry Mortgage may be terminated. Anyone who has outside employment must disclose this to the Executive Vice President of Human Resources and their direct reporting Manager. Failure to disclose outside employment may result in disciplinary action, up to termination.

H. NO SOLICITATION

Each year many requests are received from organizations and individuals seeking permission to distribute literature and solicit or collect contributions for various causes. Many of these requests are made in support of worthwhile causes that are commendable; however, if all such requests were granted, it would severely damage the efficiency of our operation. Therefore, it is necessary to limit such solicitations and distributions by the following rules:

1. Solicitations seeking contributions, payments, funds, and other solicitations or distributions of literature are not permitted on Company property at any time by outside groups or organizations or any person not employed at the Company.
2. No Company employee shall be permitted to solicit on behalf of any cause or organization while either the employee soliciting or the employee solicited is on working time. This applies to both work areas and non-work areas.
3. No Company employee shall be permitted to distribute any type of printed matter on behalf of any group or organization in any work area. This rule applies regardless if the employee is on working time or non-working time.
4. The only exceptions to these rules are the few philanthropic campaigns and/or local causes, which the Company sponsors and supports at a corporate level, where participation is voluntary.

I. WHISTLEBLOWING

CrossCountry Mortgage is committed to internal identification and correction of inappropriate conduct and actions. To further that commitment, CrossCountry Mortgage encourages employees to report substantial, credible concerns of misconduct or unethical behavior. Employees may address such concerns to any level of the organizational structure, including the Executive Committee, with complete comfort and confidence.

The purpose of this policy is to set forth Company policy on employee disclosure of misconduct and to protect employees from retaliation in the form of adverse personnel action for doing so.

1. **Scope** - This policy is applicable to all employees of CrossCountry Mortgage, its subsidiaries and/or affiliates. CrossCountry intends this policy to assist employees who believe they have discovered egregious behavior or conditions including, but not limited to:
 - a. Fraud or fraudulent financial reporting;
 - b. Failure to comply with legal obligations;
 - c. Dangers to health and safety of employees;
 - d. Suspected improper behavior related to sales practices and production incentives;
 - e. Criminal activity including fraud and embezzlement; and/or,
 - f. Attempts to conceal any of the above.

Employees may utilize procedures outlined in this policy for making a good faith disclosure of behavior or conditions described above. CrossCountry does not intend that employees utilize this policy to question normal financial or business decisions made by the company or its management, nor does it intend use of this policy to question or reconsider matters addressed under other policies or procedures. Other established policies and procedures address employee grievances, discipline, harassment and general personnel matters.

2. **Disclosure of Misconduct** - Employees may report misconduct to any CrossCountry supervisor or manager. However, CrossCountry encourages employees to make a confidential report of misconduct directly to the Chief Audit Officer. If an employee reports misconduct to any other employee, then the employee receiving the report shall escalate the matter to the Chief Audit Officer. If the matter concerns the Chief Audit Officer, then the receiving employee shall escalate the matter to the Chief Legal Officer.

The Chief Audit Officer or Chief Legal Officer (the “Investigator”) will conduct any requisite investigation and document results. Results shall be reported to the Executive Committee. If a matter concerns another member of the Executive Committee, the Investigator will report investigation results to other CrossCountry executives on a need-to-know basis.

Employees should disclose all relevant information regarding the alleged misconduct such as the nature of the misconduct, person(s) or department(s)

involved, account(s) involved, date(s) of occurrence(s), etc. CrossCountry encourages employees to include their name and contact information in their disclosure; however, anonymous reports also receive a full inquiry to the extent that is possible based on the information provided.

The Chief Audit Officer's contact information is as follows:

Barbara Voytek
PERSONAL & CONFIDENTIAL
2160 Superior Avenue
Cleveland, OH 44114
Phone: (440) 262-3504
Email: Barbara.Voytek@myccmortgage.com

The Chief Legal Officer's contact information is as follows:

Alex J. Ragon, Esq.
PERSONAL & CONFIDENTIAL
2160 Superior Avenue
Cleveland, OH 44114
Phone: (440) 262-3854
Email: Alex.Ragon@myccmortgage.com

3. **Confidentiality** - Employees who raise concerns of misconduct will not have their identity disclosed without their prior consent. However, in some situations, the Investigator may be unable to complete the investigation without either documenting the source of the report and/or obtaining a statement by the employee making the report.
4. **Safeguards Against Retaliation** - CrossCountry will not take disciplinary or retaliatory action against an employee who raises substantial, credible concerns of misconduct. Prohibited disciplinary or retaliatory actions include:
 - a. Removal or suspension;
 - b. Withholding a salary increase or benefits to which the reporting employee would have otherwise been entitled;
 - c. Transferring or reassigning the employee, except on the written request of such employee;
 - d. Denying a promotion which the employee would otherwise have received; or,
 - e. Reducing the employee's pay, job responsibilities, position, or job title.

If, however, an investigation shows that an employee has made malicious or unsubstantiated allegations, and particularly if the employee persists in making them, CrossCountry may take disciplinary action against that employee.

5. **Employee Awareness** - Human Resources shall present this Whistleblower Policy to every new employee as part of the Human Resources Department's new employee orientation. The person conducting the orientation session shall

provide the new employee with a brief explanation of the Whistleblower Policy and its importance and shall answer any questions regarding the policy.

J. REQUIRED COMPLIANCE TRAINING

CrossCountry Mortgage requires each employee to complete specifically assigned compliance training courses aligned with your job position as commonly required by regulation in the financial lending industry. Failure to complete any assigned course in a timely manner may result in disciplinary action, up to and including termination.

New Hires

CrossCountry automatically assigns training courses to all new hires, typically within three days of hire date. Employees must complete assigned courses within the first 30 days of hire. New hires receive access instructions for the Learning Management System (LMS) via email, which will have a subject line of “CCM’s Learning Management System – Registration Information”.

Employees receive course completion email reminders based on the preference of the course owners or executive management.

If an Employee fails to complete the training course(s) within the calendar year or required due date, the Corporate Training Department will refer a list of employees to the Executive Management Team for further disciplinary action; this may include termination of the Employee’s access to the Loan Origination System or additional actions, up to and including termination of employment.

Existing Employees

CrossCountry Mortgage will assign required training to all existing employees based on a schedule determined by department executives.

Employees receive course completion email reminders based on the preference of the course owners or executive management.

If an Employee fails to complete the training course(s) within the calendar year or required due date, the Corporate Training Department will refer a list of employees to the Executive Management Team for further disciplinary action; this may include termination of the Employee’s access to the Loan Origination System or additional actions, up to and including termination of employment.

Training-specific inquiries may be directed to the Corporate Training Department at Training@ccm.com.

EMPLOYEE STATUS, RECORDS, WORK CONDITIONS & HOURS

The task of handling employee records and related personnel administration functions at CrossCountry Mortgage has been assigned to the Human Resources Department. Questions regarding insurance, wages, and interpretation of policies may be directed to your manager and the Executive Vice President of Human Resources.

A. EMPLOYMENT TYPE

It is the intent of CrossCountry Mortgage to specify employment classifications so that employees understand their employment status and eligibility for benefits.

- a. Full-Time Employees regularly work 40 or more hours each week.
- b. Variable Employees work less than 40 hours each week.

In addition to the preceding categories, employees are also categorized as Exempt or Non-Exempt.

- a. Exempt Employees are not entitled to overtime pay and may also be exempt from minimum wage requirements pursuant to applicable federal and state laws.
- b. Non-Exempt Employees are all employees other than exempt employees and are entitled to overtime pay as required by applicable federal and state laws. Employees are responsible for completing their timecards accurately in the CCM HRIS System, which is subject to manager approval. All overtime must be approved by Employee's manager prior to Employee working any overtime. Employees are required to notify their manager when the need to work overtime is present and obtain approval in advance.

If you are unsure of the job classification of your position, please ask the Executive Vice President of Human Resources.

B. PAYDAYS & PAYROLL POLICIES

Employees will receive their paychecks bi-weekly and are paid one week in arrears. The paycheck is for work performed during the 2-week period prior to the week in which the check is received. Employees will receive commission and/or bonus income via bi-weekly and/or monthly payroll schedule in accordance to state law. If a pay day falls on a holiday, payment will be made on the following business day. However, every effort will be made to pay employees on the preceding business day whenever possible.

Employees are responsible for maintaining their personal information in the CCM HRIS System, which includes but not limited to direct deposit account information, home address, emergency contacts, etc. If an employee experiences a home address change, the employee is responsible for updating their address in the CCM HRIS System as soon as feasibly practical.

C. PAYROLL DEDUCTIONS

CrossCountry Mortgage is required by law to make certain deductions from your paycheck each time one is prepared. Among these are your federal, state and local

income taxes and your contribution to Social Security. These deductions will be itemized on your check stub. The amount of the deductions will depend on your earnings and on the information you furnish on your W-4 form. If you need to modify your W-4, change can be made within the CCM HRIS system or by requesting a new W-4 form from the Human Resources Department (or Payroll Department). Only you may modify your W-4 form. Verbal or written instructions are not sufficient to modify your withholding. We advise you to check your pay stub to ensure that it reflects the proper number of withholdings.

The W-2 form you receive annually reflects how much of your earnings were deducted for these purposes. Any other mandatory deductions to be made from your paycheck, such as court-ordered garnishments, will be explained whenever CrossCountry Mortgage is ordered to make such deductions.

D. ERRORS IN PAY

If an employee forgets to record attendance or if an error occurs, the employee needs to immediately notify their Manager and work with the Payroll Department to ensure that the correction is made properly and promptly.

E. WORK PERIODS

- Full-time working hours are 40 hours per week or as scheduled by management. All employees must work scheduled time unless changes are authorized by management.
- Company hours of operation are typically 8 am to 5 pm, Monday through Friday. The Company typically offers a 1-hour lunch break; however, the workday and scheduling may vary depending upon business need and applicable state law. Under no circumstances shall an employee be allowed to take, or a manager approve, a lunch break of less than a 1-hour for the purpose of shortening the employee's workday.

F. ABSENCES AND LATENESS

The efficient operation of the Company depends on the regular attendance and punctuality of the Company's employees. CrossCountry Mortgage therefore expects that employees will arrive for work and be prepared to be productive at their workstations at the scheduled time on a consistent, daily basis.

Attendance and punctuality are important factors for your success within our company. We work as a team and this requires that each person be in the right place at the right time.

If you are going to be late for work or absent, notify your immediate Manager as far in advance as is feasible under the circumstances, but before the start of your workday. Poor attendance and excessive tardiness are disruptive and may lead to disciplinary action, up to and including termination of employment.

Personal issues requiring time away from your work, such as doctor's appointments or other matters, need to be scheduled during your non-working hours if possible.

If an employee fails to show up to work as normally scheduled for three (3) consecutive days without, during that same period of time, any communication or explanation to their direct manager, then the Company will consider the absent employee to have voluntarily abandoned their job, and the Company will remove the employee from the payroll.

Except where otherwise prohibited by state or local law, any employee who is absent due to illness or another medical condition for a period of three (3) or more consecutive days shall provide a doctor's note to the Human Resources Department prior to returning to work. Depending on the circumstances and/or medical condition resulting in the absence, the Human Resources Department may require the employee to provide a medical release prior to returning to work.

If you believe your absences or lateness are caused by a disability, you should contact Human Resources. CrossCountry Mortgage will consider such situations on a case-by-case basis, in accordance with federal and state disability law, and make a reasonable accommodation as appropriate.

G. MEAL PERIODS AND REST BREAKS – CALIFORNIA³

The Company's policy regarding meal and rest periods for employees working in the State of California is set forth below. Our Company prides itself in our open-door policy and we encourage you to contact us directly if you have any questions about the policies included below or if you need assistance with respect to managing your schedule so that you may take your meal and rest periods.

Meal Periods

Non-Exempt Employees who work at least five (5) hours in a day are provided an unpaid meal period of at least thirty (30) minutes. The Company may, in its sole discretion, assign a longer meal period to particular job functions or particular employees, but the Company is not required by law to do so. Non-Exempt Employees will be relieved of all duties during meal periods. Where a work period of no more than six (6) hours will complete the day's work, the meal period may be waived by the mutual consent of the employee's direct manager and the employee. Employees who work over six (6) hours in a day may not waive their meal periods, except as specifically provided below.

The Company also provides Non-Exempt Employees who work more than ten (10) hours in a day with a second meal period of at least thirty (30) minutes. Employees who work shifts of more than ten (10) hours, but no more than twelve (12) hours may voluntarily waive their right to a second meal period by the mutual consent of the employee's direct manager and the employee.

Employees are provided ample time in their schedule to take their meal and rest periods and are responsible for taking their meal and rest periods consistent with this policy. Employees are responsible for ensuring that the meal period is taken no later than the end of his or her fifth (5th) hour of work.

³ Employees not located in the state of California should refer to p. 16 concerning meals and rest periods.

Meals are not to be eaten while still “on the clock” and should be eaten away from the employee’s work area. Except as otherwise provided above, employees must take all of their meal periods and may not skip a meal period to arrive late, leave early, or work extra time. If, for any reason, you feel that you do not have adequate time to take a thirty (30) minute meal period within the time periods stated above, it is your responsibility to notify your direct manager or the Human Resources Department so that adequate accommodations may be provided.

Rest Breaks

Non-Exempt Employees are also entitled to one paid ten (10) minute rest break for every four (4) hours worked, or major fraction thereof. Thus, employees who work shifts of three and one-half (3.5) to six (6) hours in length are entitled to take one (1) paid ten (10) minute rest break. Employees who work shifts of more than six (6) hours and up to ten (10) hours are permitted to take two (2) paid ten (10) minute rest breaks. Employees who work less than three and one-half (3.5) hours in a day are not entitled to a rest break.

Rest breaks should be taken as close to the middle of each four (4) hour period worked as reasonably possible. The schedule for rest breaks is as follows:

For shifts between three and one-half (3.5) hours to six (6) hours in length, one ten (10) minute rest break should be taken following the beginning of the second (2nd) hour, but before the end of the fourth (4th) hour.

For shifts of more than six (6) hours and up to ten (10) hours in length, a second ten (10) minute rest break should be taken following the beginning of the sixth (6th) hour, but before the end of the eighth (8th) hour.

Rest breaks may not be combined or added to a meal period and cannot be skipped in order to arrive late, leave early, or work extra time. Non-Exempt Employees will be relieved of all duties during rest breaks, although employees do not need to clock in and out for rest breaks.

If, for any reason, you feel that you do not have adequate time to take a ten (10) minute rest break for every four (4) hours worked, or major fraction thereof, it is your responsibility to notify your direct manager or the Human Resources Department so that adequate accommodations may be provided.

Unauthorized Work During Meal Periods and Rest Breaks

Meal periods and rest breaks are designed to ensure that employees have uninterrupted time to themselves throughout the day. Employees are prohibited from engaging in work-related activities during meal periods and rest breaks. Employees who feel that work-related activities are inhibiting their ability to take their meal periods and/or rest breaks are directed to discuss the issue with their direct manager and/or with Human Resources.

Exempt Employees

Exempt Employees may generally take meal periods and a reasonable amount of rest breaks at their discretion.

H. LACTATION BREAK

The Company will provide a reasonable break time for an employee to express breast milk for her nursing child for 1 year after the child's birth each time such employee has need to express the milk. The Company will also make a reasonable effort to provide the employee with the use of a room, other than a bathroom, in close proximity to the employee's work area for the employee to express milk in private. Break times will be provided as needed to the nursing mother, as necessity and duration may vary. Employees are expected to notify Human Resources if they are in need of time and space to express breast milk under this policy. Human Resources will communicate and coordinate with management to support accommodation efforts. Human Resources may be contacted at HumanResourcesTeam@ccm.com.

I. OVERTIME

When operating requirements or other needs cannot be met during regular working hours, employees may be asked to work overtime. Employees will be required to work overtime when requested. When possible, advance notification of these assignments will be provided.

Overtime compensation is paid to all non-exempt employees in accordance with federal and state wage and hour restrictions. All non-exempt employees who work more than forty (40) hours in one workweek will receive overtime pay computed at a rate of one and one-half (1 1/2) times the employee's regular rate of pay. California non-exempt employees who work more than eight (8) hours in one workday or more than forty (40) hours in one workweek will receive overtime pay computed in the same manner as described above. Overtime will be paid to non-exempt employees at a rate of double the employee's regular rate of pay for all hours worked in excess of twelve (12) hours in one workday. The Company does not permit employees to take time off in lieu of receiving overtime pay.

Non-exempt employees must receive authorization from their direct manager before working overtime. Overtime worked without prior authorization may result in disciplinary action, up to and including possible termination of employment.

J. SMOKING AND TOBACCO

CrossCountry Mortgage prohibits smoking and any other use of tobacco products inside or immediately adjacent to its corporate facilities. The Company's goal is to provide a healthy, safe, and pleasant work environment.

Smoking is defined as the inhaling, exhaling, burning, vaping or carrying any lighted cigar, cigarette, electronic device, pipe or other lighted smoking device for burning tobacco or any other plant. Smoking is not permitted in the place of employment even during lunch or break times.

At the Ohio corporate office, and in any other facility owned by the Company, smoking is not permitted anywhere on the premises except for the Company parking lot, but then only if the employee smokes within a closed vehicle. Each satellite office shall follow the rules and regulations of the building in which the office sits; however, despite any rules to the contrary, smoking is prohibited in all CrossCountry Mortgage offices.

Smoking is also prohibited in company vehicles owned or leased by CrossCountry Mortgage.

K. VISITORS

For business reasons personal visitors are prohibited from visiting the company's workplaces. In case of an emergency, see your manager for permission to meet with the visitor for a few minutes. All visitors must register in the office. Permission may be granted to meet with employees during lunch period in the lunch area or office. The visit may be brief and shall not interrupt the workflow. If someone will not leave, please notify your manager.

L. DRESS CODE

CrossCountry Mortgage's dress code policy is designed to help us all provide a consistent professional appearance to our customers and colleagues. Our appearance reflects on ourselves and the company. It is important to be sure that we maintain a positive appearance and not offend customers or colleagues.

Our goal is to provide a workplace environment that is comfortable and inclusive for all employees. We expect that your business attire, although casual, will exhibit common sense and professionalism.

Employees are expected to demonstrate good judgment and professional taste. Courtesy towards coworkers and your professional image to coworkers are the factors you need to use to assess whether you are dressing in business attire that is appropriate.

Employees who wear business attire that is inappropriate in the workplace will be addressed on a case-by-case basis rather than subjecting all employees to a more stringent dress code for appropriate business attire.

Dress code may vary by season and department. Please refer to your specific department manager for any questions.

Casual Dress Code Guidelines

Because all casual clothing is not suitable for the office, these guidelines will help you determine what is appropriate to wear to work. Clothing that works well for the beach, yard work, dance clubs, exercise sessions, and sports may not be appropriate for a professional, casual appearance at work.

In a casual work setting, employees should wear clothing that is comfortable and practical for work, but not inappropriate or offensive to others, or that might make others uncomfortable. Any clothing that has words, terms, or pictures that may be offensive to other employees is unacceptable. Clothing that has the company logo is encouraged. Sports team, university, and fashion brand names on clothing are generally acceptable. Employees must always present a clean, professional appearance. Everyone is expected to be well-groomed and wear clean clothing that is pressed and never wrinkled.

Makeup, Perfume, Cologne, Jewelry and Piercings

Remember that some employees are allergic to the chemicals in perfumes and makeup, so wear these substances with restraint.

The Company recognizes the value of personal self-expression and establishes parameters for when personal appearance enhanced by jewelry or piercings exceeds appropriate and reasonable workplace limits. Extreme jewelry and body piercings are not permitted.

Dress Code for Travel and Customer Interaction, and Trade Shows

While the office setting can be casual because customers don't visit, traveling to see customers, exhibiting at or attending trade shows, and representing the company in the business community, requires different decisions about attire. Business casual dress is the minimum standard that must be observed when you are representing the company or interacting with customers or potential customers.

Before visiting a customer or potential customer ascertain the accepted dress code and match it in your attire. This is especially important when you are traveling nationwide representing the company as customs and dress may differ from those observed in your local area.

Additionally, some community events, when you are representing the company, might require formal dress. These might include Chamber of Commerce and other civic or business development meetings, luncheons, and dinners. Take your cue from other employees who have attended and be observant at the event. Certainly, if you are a speaker at a business event, consider wearing formal dress.

Finally, on the occasions when a customer or a business partner does visit the office, the employee groups with whom the visitor is interacting, should adhere to business casual standards.

Nothing in this Dress Code provision is intended to violate state or federal law.

LEAVE BENEFITS

A. FAMILY AND MEDICAL LEAVE ACT

Eligible employees are entitled to twelve (12) weeks of unpaid, job-protected leave for certain family and medical reasons. Longer leave may be available if leave is needed to care for a *covered servicemember* under the military leave entitlement as explained in this policy.

Eligibility

In order to qualify for FMLA leave, employees must:

- be employed at a work site which has at least fifty (50) employees within seventy-five (75) miles of that work site;
- be employed for at least 12 months by the Company; and
- have worked 1250 hours in the twelve-month period preceding the leave.

Reasons for Leave

Leave must be taken for one of the following circumstances:

- Incapacity due to pregnancy, prenatal medical care or childbirth;
- The placement of a child with the employee in connection with adoption or foster care;
- To care for a child, parent or spouse who has a serious health condition (see definition below);
- Because of an employee's own serious health condition (see definition below) that makes the employee unable to perform the essential functions of his or her position; or
- Military related leave (as described in this policy).
 - Because of any "qualifying exigency," arising out of the fact that the spouse, son, daughter, or parent of the employee is on active duty and is being deployed to a foreign country or is a member of the National Guard or Reserves who has been notified of an impending call to active duty status in the Armed Forces for deployment to a foreign country;
 - "Qualifying exigency" includes: (i) Issues arising from a covered military member's short notice deployment (i.e., deployment on seven or less days of notice) for a period of **seven** days from the date of notification; (ii) Military events and related activities, such as official ceremonies, programs, or events sponsored by the military or family support or assistance programs and informational briefings sponsored or promoted by the military, military service organizations, or the American Red Cross that are related to the active duty or call to active duty status of a covered military member; (iii) Certain child care and related activities arising from the active duty or call to active duty status of a covered military member, such as arranging for alternative childcare, providing childcare on a non-routine, urgent, immediate need basis, enrolling or transferring a child in a new school or day care facility, and attending certain meetings at a school or a day care facility if they are necessary due to circumstances arising from the active duty or call to active duty of the covered military member;

(iv) Making or updating financial and legal arrangements to address a covered military member's absence; (v) Attending counseling provided by someone other than a health care provider for oneself, the covered military member, or the child of the covered military member, the need for which arises from the active duty or call to active duty status of the covered military member; (vi) Taking up to **five** days of leave to spend time with a covered military member who is on short-term temporary, rest and recuperation leave during deployment; (vii) Attending to certain post-deployment activities including attending arrival ceremonies, reintegration briefings and events, and other official ceremonies or programs sponsored by the military for a period of 90 days following the termination of the covered military member's active duty status, and addressing issues arising from the death of a covered military member; and (viii) Any other event that the employee and employer agree is a qualifying exigency.

- Certification When Leave is due to a "Qualifying Exigency": Employees needing qualifying exigency leave must provide a copy of the covered military member's active duty orders or other documentation issued by the military that indicates the covered member is on active duty or call to active duty status in support of a contingency operation and the dates of the member's active duty service. The employee also must provide a statement of the facts regarding the qualifying exigency for which FMLA leave is requested. [Form WH-384 Certification of Qualifying Exigency for Military Family Leave]
- To care for a *covered servicemember, including qualified veterans*, or "Caregiver Leave."⁴

Spouse Employees

Married employee couples may be restricted to a combined total of twelve (12) weeks FMLA leave within any twelve (12) month period in cases other than the employee's own serious health condition.

Designation of Leave

Employees may request FMLA leave and/or the Company may designate any qualifying leave as FMLA leave.

Measuring Leave

The twelve (12) month period in which the twelve (12) weeks of leave entitlement occurs is a rolling twelve (12) month period, measured backward from the date an employee uses any FMLA leave. Thus, each time an employee takes FMLA leave, the remaining leave entitlement would be any balance of the twelve (12) weeks which has not been used during the immediately preceding (12) months.

Notice of Need for Leave

⁴ There are special rules regarding leave to care for a covered servicemember ("Caregiver Leave"). Those rules are set forth in this policy.

Employees must give thirty (30) days advance notice of the desire to take FMLA leave in circumstances where the need for such leave is foreseeable. FMLA leave to accommodate planned medical treatment should be scheduled to avoid disruption of Company operations. In any case in which the necessity for military “qualified exigency” leave is foreseeable, the employee must provide reasonable and practicable notice.

Definition of Serious Health Condition

A serious health condition is generally defined as a physical or mental condition which requires inpatient care at a hospital, hospice, or residential medical care facility, or continuing treatment by a health care provider. The continuing treatment requirement may be met by (i) a period of incapacity of more than three (3) consecutive calendar days combined with at least two (2) visits to a health care provider or one visit and a regimen of continuing treatment; (ii) incapacity due to pregnancy, or (iii) incapacity due to a chronic condition.

Employees with questions about what conditions or illnesses are covered under FMLA are encouraged to consult with Human Resources.

Continuation of Benefits

While an employee is on leave, the Company will continue the employee’s medical benefits during the leave period at the same level and under the same conditions as if the employee had continued to work. Under current Company policy, the employee pays a portion of the health care premium. While on *paid* leave, the Company will continue to make payroll deductions to collect the employee’s share of the premium. While on unpaid leave, the employee’s health care premiums will accrue with the Payroll Department. Once the employee returns from paid or unpaid leave, if there is an accrued premium balance these premiums will be deducted from the next payroll. If the accrued premium balance is in excess of the employee’s first paycheck, then the employee can expect their future paychecks to have those premiums deducted from until recouped in its entirety.

If an employee chooses not to return to work for reasons other than a continued serious health condition of the employee or the employee's family member, or a circumstance beyond the employee’s control, the Company will require the employee to reimburse the Company the amount it paid for the employee’s health insurance premium during the leave period.

If the employee contributes to a life insurance or disability plan, the Company will continue making payroll deductions while the employee is on paid leave. While the employee is on unpaid leave, the employee may request continuation of such benefits, and pay their portion of the premiums; or the Company may elect to maintain such benefits during the leave and pay the employee’s share of the premium payments. If the employee does not continue these payments, the employer may discontinue coverage during the leave. If the Company maintains coverage, the Company may recover the costs incurred for paying the employee's share of any premiums whether or not the employee returns to work.

Insurance coverage typically ends at the completion of FMLA if an employee does not return to work or has extended the leave. A COBRA notice will be sent at this time, if applicable.

Increments of Leave

In some circumstances, the employee may take FMLA leave intermittently (take time off periodically) or use leave to reduce the workweek or workday, resulting in a reduced hour schedule. If leave is requested on this basis, the Company may require the employee to temporarily transfer to an alternative position which better accommodates recurring periods of absences or a reduced schedule. Leave for planned medical treatment should be scheduled to avoid disruption of Company operations. Intermittent leave and/or a reduced hour schedule are generally not permitted for the birth or placement of a child for adoption or foster care.

Certification of Serious Health Condition (and Recertification)

An employee requesting FMLA leave because of the employee's serious health condition or to care for a child, spouse or parent must provide medical certification of the serious health condition of the employee or individual requiring care. Forms are available from Human Resources. The Certification should be submitted within fifteen (15) days of the employee's initial absence or leave request. It is the employee's responsibility to make sure the Certification is complete and provided in a timely manner.

The Company may require that the employee obtain re-certification regarding the serious health condition of the employee or the employee's child, spouse or parent in certain circumstances. Employees and family members who have a serious health condition lasting longer than a year must provide a new medical Certification each year.

The Company may require, at its own expense, examination of the employee by an independent second health care provider. If the opinion of the second provider differs from the employee's health care provider, the Company may require, at its own expense, a third opinion. The third opinion is final and binding.

[Form WH-380E Certification of Health Care Provider for Employee's Serious Health Condition

[Form WH-380F Certification of Health Care Provider for Family Member's Serious Health Condition]

Use of Paid Time Off

Employees are required to use all pro-rated unused Paid Time Off ("PTO") during the leave if Company policy allows leave in such circumstances. Employees are required to substitute sick leave or PTO, as applicable, to attend to their own serious medical condition, and may elect to substitute sick leave to attend to an illness of the employee's child, parent, spouse, or domestic partner. Any family and medical leave that extends beyond the period covered by paid time off will be unpaid unless otherwise covered by any applicable disability policy.

All paid time off will not accrue or pro-rate while an employee is on FMLA leave.

Restoration of Employment

Upon return from FMLA leave, employees will be restored to their former positions or comparable positions will be made available to them, unless (1) the employee would not otherwise have been employed at the time reinstatement is requested or (2) reinstatement would cause substantial and grievous economic injury and is being sought by an employee who is among the ten percent (10%) best-paid employees at the work location or within seventy-five (75) miles of the location.

As a condition of the employee's return from leave taken because of the employee's own serious health condition, the employee must obtain a fitness for duty certification that specifically addresses the employee's ability to perform the essential functions of the employee's job.

Unless an employee is granted an extension of his or her leave, failure to return to work on the day after the expiration of the FMLA leave will be considered a voluntary resignation. If an employee is disabled, requires an additional recovery time, and/or may need additional accommodations it is the employee's responsibility to consult with Human Resources regarding reasonable accommodations.

Caregiver or Covered Servicemember Leave

An eligible employee who is the spouse, son, daughter, parent or next of kin (nearest blood relative) of a "*covered servicemember*" is entitled to leave to care for that *covered servicemember* who has a *serious injury or illness*.

A "*covered servicemember*" is a member of the Armed Forces who has a "serious health, illness or injury" incurred by the member on active duty in the Armed Forces that may render the member medically unfit to perform the duties of the member's office, grade, rank, or rating. "Covered service members" also include veterans who are undergoing medical treatment for a "qualifying serious injury or illness" sustained in the line of duty who were members of the Armed Forces within five years preceding the need for the medical treatment.

"*Serious injury or illness*" means: (i) undergoing medical treatment, recuperation, or therapy; or (ii) is otherwise an outpatient; or (iii) is otherwise on the temporary disability retired list. It also includes service-related aggravation of existing or preexisting injuries.

"*Next of kin*" means the nearest blood relative other than the *covered servicemember's* spouse, parent, son or daughter (blood relatives with custody, brothers and sisters, grandparents, aunts and uncles and first cousins). A *covered servicemember* may designate in writing a blood relative as next of kin for purposes of caregiver leave. If this is done, the designated person is the *only* next of kin for these purposes. When no designation is made, all eligible family members are considered next of kin and each may take FMLA leave consecutively or simultaneously. Employers may require confirmation of a "*next of kin*" relationship.

Duration of Caregiver Leave

An eligible employee may take up to 26 work weeks of leave in a single 12-month period to care for the *covered servicemember*. Leave to care for a *covered servicemember*, even if combined with other FMLA-qualifying leave, may not exceed 26 weeks in a single 12-month period. For purposes of caregiver leave, the 12 month period commences on the date the employee first takes leave to care for a *covered servicemember*.

Notice for Covered Servicemember Leave

When leave is foreseeable based on planned medical treatment for a serious injury or illness of a *covered servicemember*, the employee must provide 30 days' notice. If 30 days' notice is not practicable, notice must be given as soon as practicable.

Substitution of Paid Leave for "Covered Servicemember" Leave

An eligible employee is required to substitute any PTO to leave to care for a *covered servicemember*. Any such FMLA leave that extends beyond the period covered by paid leave will be unpaid.

Certification

Medical Certification of leave to care for a *covered servicemember* is required. Certification may be provided by a health care provider with the U.S. Department of Defense ("DOD"), the U.S. Department of Veterans Affairs, a DOD Tricare network or a DOD non-network Tricare authorized private health care provider.

[Form WH-385 Certification of Serious Illness or Injury for Covered Servicemember for Military Leave]

Spouses Both Employed by the Company

When Leave is to care for a "*Covered Service member*," the aggregate amount of leave to which both a husband and wife who work for the Company are entitled is limited to 26 work weeks during the single 12-month period.

Worker's Compensation

When a work-related illness or injury also causes a serious health condition and the employee elects to take Workers' Compensation benefits, other paid leave such as vacation and sick time will not be substituted, but the absence will count against the employee's FMLA leave entitlement.

Leave Under State Military Leave Laws

Company policy is to comply with all federal, state and local law that regulates family, medical and military leave for the Company's employees.

If you have any questions regarding FMLA leave, please contact Human Resources.

B. SHORT-TERM DISABILITY

CrossCountry Mortgage provides an employer paid Short-Term Disability plan, thru UNUM at no cost, to all full-time employees working at least 40 hours per week. This Short-Term Disability plan provides financial protection for you by

paying a portion of your income while you are disabled. The amount you receive is based on the amount you earned before your disability began.

Elimination period is 14 days due to injury or sickness and benefits begin the day after the elimination period is completed. Weekly benefit is 60% of weekly earnings to a maximum benefit of \$2,000 per week, up to 11 weeks. Your payment may be reduced by deductible sources of income and disability earnings. Some disabilities may not be covered under this plan. Employees can expect to have their healthcare premiums deducted from their bi-weekly payroll until fully on disability. Once the employee is no longer receiving a paycheck from the Company and fully on disability, those premiums will begin to accrue with the Payroll Department. The employee is required to coordinate the arrangement of repayment on premiums on their first scheduled return date with the Payroll department.

If you have any questions regarding Short-Term Disability, please contact Human Resources.

C. MILITARY LEAVE

In accordance with the Uniformed Services Employment and Reemployment Rights Act (USERRA) and applicable state law, paid military leave will be granted to regular full-time and regular variable employees to attend scheduled drills or training or if called to active duty with the armed forces of the United States, the National Guard or the National Militia. Advance notice of 30 days of military service is required, unless military necessity prevents such notice or it is otherwise impossible or unreasonable to provide such notice. For leaves of longer than a week, employees may use pro-rated PTO or voluntary unpaid leave of absence.

Contact Human Resources for more information about military leave, including benefits, continued duration, and return to employment duties.

D. LEAVE OF ABSENCE FOR WORK-RELATED INJURIES

The Company has workers' compensation insurance to provide coverage for employees who are injured on the job. An employee must notify his/her manager and Executive Vice President of Human Resources immediately if occupational illness or injury has occurred. An employee is entitled to take a leave of absence for an occupational illness or injury, generally for a time period equal to the duration of the temporary total disability. When on a leave of absence for a work-related medical disability, the employee must be examined by a health care provider and certified to be temporarily disabled from returning to employment. Generally speaking, the employee's leave of absence will end as soon as a health care provider certifies that the employee is able to safely return to work.

E. VOLUNTEER FIREFIGHTER, RESERVE POLICE OFFICER, AND EMERGENCY RESCUE PERSONNEL

Non-exempt employees will be granted time off to perform emergency duties as a volunteer firefighter, reserve peace officer, or emergency rescue personnel.

Time off for non-exempt employees will be unpaid. Exempt employees who work any portion of a workweek in which they also perform such emergency duties or

training will receive their full salary for that workweek. Otherwise, exempt employees will be granted time off without pay.

Exempt employees may substitute vacation pay for any unpaid portion of leave to perform such emergency duties or training.

F. BEREAVEMENT LEAVE

CrossCountry Mortgage understands that employees can never be compensated for the loss felt after the death of an immediate family member. In the event of a death of a family member bereavement leave may be granted to full-time employees.

Employees are allowed up to five (5) consecutive paid days off in the event of the death of the employee's spouse, domestic partner, child, stepchild, parent, stepparent, father-in-law, mother, mother-in-law, son-in-law, daughter-in-law, brother, sister, stepbrother, stepsister, or an adult who stood in loco parentis to the employee during childhood.

Employees are allowed up to two (2) paid days off in the event of the death of the employee's brother-in-law, sister-in-law, aunt, uncle, niece, nephew, grandparent, grandchild or spouse's grandparent.

Funeral leave will only be made available to full-time employees for actual time spent away from work for the funeral or its arrangements. The company reserves the right to request proof of the validity of the request for bereavement leave.

G. JURY DUTY AND WITNESS LEAVE

An employee who is notified of jury duty must immediately notify Human Resources. If an employee is required to serve as a juror s/he must comply with the following:

- A. Upon the completion of jury leave, the employee submits a certificate of attendance signed by an appropriate court official.
- B. While on jury duty, the employee must check with his or her manager on a daily basis to report availability for work for all or part of any given day during which he or she is serving as a juror.

All employees will be paid their regular hourly rate or salary, without reference to bonus or commission income, when serving as a juror. The Company will never discriminate or retaliate against employees for taking time off for jury duty, or to serve as a witness.

Employees will also be granted time off to serve as a witness. This time will be unpaid. If applicable, employees may use any accrued, unused PTO benefits during this absence. Employees taking time off to serve as a witness must provide the court subpoena to the Human Resources Department.

H. TIME TO VOTE

If an employee does not have sufficient time outside of working hours to vote in a statewide election, the employee may take off up to two (2) hours of working time to vote without loss of pay. Such time must be at the beginning or end of their regular working shift, which allows the most free time for voting and the least time

off from working, unless otherwise mutually agreed to between the employee and his or her manager. The employee must notify their manager at least two (2) working days in advance to arrange time off for voting.

I. PAID TIME OFF (“PTO”), CORPORATE/NON-BRANCH AFFILIATED EMPLOYEES ONLY (EXCLUDING CORPORATE EMPLOYEES LOCATED IN CA, CO, IL, LA, MA, ME, MT, NE, ND, RI, AND PUERTO RICO)⁵

CrossCountry Mortgage recognizes that employees will need paid time off (“PTO”) from work for traditional vacation, personal time, and other purposes. PTO under this policy is not being provided in addition to any pre-existing PTO, vacation, personal time, or paid sick leave (“PSL”) policies, which are now superseded by this policy. Employees who work in a state or local jurisdiction that requires the accrual and use of PSL will receive PSL in accordance with applicable law, as described in paragraph K below, regardless of their eligibility for PTO.

Eligibility. CrossCountry Mortgage Corporate employees who work forty (40) hours or more per week (“full-time”) are eligible for PTO under this policy. However, the following employees are not eligible to receive PTO, even if they work on a full-time basis:

- Employees such as Executive Sales Recruiters, Originating and Non-Originating Branch Managers, Outside Loan Originators, California-based Inside Loan Originators, and any employees who are party to an employment agreement wherein compensation is determined by reference to commission, except for Inside Loan Originators located outside of California. For purposes of this section, the Company considers employees who work less than forty (40) hours per week to be “variable”.

PTO Allotment. Calendar Year One of Employment Only: During first year of employment, eligible Corporate employees will be provided the following pro-rated amount of PTO based upon their date of hire, which will become available for the employee’s use beginning on their 90th day of employment.

Date of Hire Month	# of PTO Days	Date of Hire Month	# of PTO Days
January	17	July	7
February	16	August	6
March	15	September	5
April	14	October	0
May	13	November	0
June	12	December	0

Calendar Year Two of Employment and Forward: Beginning with a Corporate employee’s first full calendar year of employment, eligible Corporate employees will be provided 17 days (136 hours) of PTO on January 1 for use during the calendar year in which the PTO becomes available. However, eligible Corporate

⁵ This policy applies to only employees who are assigned to Corporate Departments who do not work in the States of CA, CO, IL, LA, MA, ME, MT, NE, ND, RI, or Puerto Rico). All other employees (branch-affiliated employees in all States, and corporate employees in the above-listed States) should refer to paragraph J below (pp. 33-36) concerning Paid Time Off (“PTO”).

employees with greater length of service will be provided more PTO days per calendar year. After their fourth consecutive full year, eligible Corporate employees will be provided 22 days (176 hours) of PTO on January 1 for use during the calendar year in which the PTO becomes available.

Years of Continuous Service	# of PTO Days (Allotment/Frontload)
0 – 4 Years	17 days (136 hours)
5+ Years	22 days (176 hours)

Use of PTO. PTO may be used for traditional vacation, personal time, or an employee’s own illness or injury. Further, eligible employees who work in a state or local jurisdiction that requires the accrual and use of PSL may use PTO consistent with PSL provisions below (reference paragraph K below).

All use of PTO is subject to the scheduling requirements described below. CrossCountry Mortgage grants PTO to eligible employees as an inducement to future service. PTO for eligible employees only becomes available for the employee’s use beginning on their 90th day of employment. Employees may use PTO for any reason, such as vacation, school, volunteerism, illness, medical appointments, care of a family member and personal business. CrossCountry Mortgage requires that employees use PTO in 1-hour increments.

Scheduling PTO. Employees are to request PTO through the online ADP Payroll and Human Resources platform at least two (2) weeks prior to the desired date of PTO use. However, in emergency circumstances employees must submit PTO requests as soon as reasonably practical. Management must approve all non-emergency PTO requests prior to PTO usage. If an employee submits PTO under emergency circumstances, management may require the employee to provide written documentation corroborating the emergency. Failure to provide requested documentation may result in disciplinary action up to and including termination of employment.

CrossCountry Mortgage reserves the right to deny PTO in the event that other employees have already scheduled PTO, the requesting employee’s absence would harm the business due to multiple absences in one work group, and/or the requested employee’s absence would negatively impact the ability of a work group to meet the demands of current or projected workload. Please plan ahead!

PTO Compensation. CrossCountry Mortgage will pay PTO at the same rate as an employee’s regular hourly rate of pay in effect at the time PTO is taken without reference to commission or bonus income, unless otherwise required by applicable state or local law.

Unused PTO. Unless applicable law requires otherwise, employees may not rollover/carryover unused hours of PTO into the following calendar year, except as specifically permitted in this policy.

Employees with 0-4 years of continuous service may rollover/carryover up to 32 hours of unused PTO into the following calendar year.

Employees with 5+ years of continuous service may rollover/carryover up to 40 hours of unused PTO into the following calendar year.

Beyond the specifically permitted rollover/carryover amounts described above, this is a “use-it-or-lose-it” policy—unused PTO in excess of these amounts will no longer be available to the employee at the end of a calendar year. Similarly, unused PTO will be forfeited upon an employee’s resignation or termination, for any reason, unless otherwise required by applicable state law.

Transfer of Position. Employees who transfer from a position eligible for PTO to a position not eligible for PTO, acknowledge and understand all remaining unused PTO balance at the time of transfer is forfeited and not payable under any circumstance, unless otherwise required by applicable state law. Employees who transfer from a position not eligible for PTO to a position eligible for PTO will receive PTO on a prorated basis depending on the month in which the transfer occurs once transition is complete according to the allotment schedule defined as “Calendar Year One of Employment Only” in this paragraph I.

Transfer of Department. Employees eligible for PTO under this policy who transfer departments from a corporate position to a branch-affiliated position (or who transfer to a corporate position in CA, CO, IL, LA, MA, ME, MT, NE, ND, RI, or Puerto Rico) will transition to the applicable PTO policy (see paragraph J below, accrual basis) at the time in which the transfer is complete, existing unused balances would remain and employees would begin to accrue PTO accordingly. Employees who transfer departments from a branch-affiliated position to a corporate position (or who transfer from a corporate position in CA, CO, IL, LA, MA, ME, MT, NE, ND, RI, or Puerto Rico to a corporate position in any other State) will transition to the applicable PTO policy (as described above in this paragraph I, allotment schedule), existing unused PTO balances would remain. The Payroll Department will reconcile and upon completion, employees may receive additional PTO on a prorated basis depending on the month in which the transfer occurs once transition is complete according to the allotment schedule defined as “Calendar Year One of Employment Only” in this paragraph I.

1 Day = 8 hours. In previous Employee Handbooks, CrossCountry Mortgage measured PTO in days. For purposes of clarification, 1 day is equal to eight (8) hours.

J. PAID TIME OFF (“PTO”), BRANCH-AFFILIATED/NON-CORPORATE EMPLOYEES (INCLUDING CORPORATE EMPLOYEES LOCATED IN CA, CO, IL, LA, MA, ME, MT, NE, ND, RI, AND PUERTO RICO)⁶

CrossCountry Mortgage recognizes that employees will need paid time off (“PTO”) from work for traditional vacation, personal time, and other purposes. PTO under

⁶ This policy applies to only (1) branch-affiliated/non-corporate employees in all States, and (2) Corporate employees who work in the States of CA, CO, IL, LA, MA, ME, MT, NE, ND, RI, or Puerto Rico). All other employees (Corporate employees in any location other than the above-listed States) should refer to paragraph I above (pp. 31-33) concerning Paid Time Off (“PTO”).

this policy is not being provided in addition to any applicable pre-existing PTO, vacation, personal time, or paid sick leave (“PSL”) policies, which are now superseded by this policy. Employees who work in a state or local jurisdiction that requires the accrual and use of PSL will receive PSL in accordance with applicable law, as described in Section K below, regardless of their eligibility for PTO.

Eligibility. CrossCountry Mortgage employees⁶ who work forty (40) hours or more per week (“full-time”), unless otherwise required under applicable state or local law, are eligible for PTO under this policy. However, the following employees are not eligible to receive PTO, even if they work on a full-time basis:

- Employees such as Executive Sales Recruiters, Originating and Non-Originating Branch Managers, Outside Loan Originators, California-based Inside Loan Originators, and any employees who are party to an employment agreement wherein compensation is determined by reference to commission, except for Inside Loan Originators located outside of California. For purposes of this section, the Company considers employees who work less than forty (40) hours per week to be “variable”.

PTO Accrual. Eligible employees shall begin to accrue PTO hours as of their first day of employment, and will be subject to the accrual schedule based on years of continuous service illustrated in the chart below:

Years of Continuous Service	Accrual Rate	Maximum Accrual Cap
0 – 4 Years	5.23 hours PTO per bi-weekly pay period	168 hours
5+ Years*	6.77 hours PTO per bi-weekly pay period	216 hours

*CrossCountry Mortgage measures years of service based upon an employee’s anniversary date. For example, if an employee’s first day of employment is March 1, 2020 the employee will achieve 5 years of service on March 1, 2025. Beginning on that date, the employee will begin to accrue PTO at 6.77 hours per bi-weekly pay period.

Once an employee reaches the maximum accrual cap, the employee will cease accruing PTO hours unless otherwise required under applicable state or local law. Accrual will resume once the employee uses PTO hours and the employee’s PTO balance falls below the maximum accrual cap, unless otherwise required under applicable state or local law.

Use of PTO. PTO may be used for traditional vacation, personal time, or an employee’s own illness or injury. Further, eligible employees who work in a state or local jurisdiction that requires the accrual and use of PSL may use PTO consistent with PSL provisions below in paragraph K.

All use of PTO is subject to the scheduling requirements described below. CrossCountry Mortgage grants PTO to eligible employees as an inducement to future service. Unless otherwise required by applicable law, PTO for eligible employees only becomes earned/vested and available for the employee’s use

beginning on their 90th day of employment. Once earned/vested, employees may use PTO for any reason, such as vacation, school, volunteerism, illness, medical appointments, care of a family member and personal business. CrossCountry Mortgage requires that employees use PTO in 1-hour increments.

Scheduling PTO. Employees are to request PTO through the online ADP Payroll and Human Resources platform at least two (2) weeks prior to the desired date of PTO use. However, in emergency circumstances employees must submit PTO requests as soon as reasonably practical. Management must approve all non-emergency PTO requests prior to PTO usage. If an employee submits PTO under emergency circumstances, management may require the employee to provide written documentation corroborating the emergency. Failure to provide requested documentation may result in disciplinary action up to and including termination of employment.

CrossCountry Mortgage reserves the right to deny PTO in the event that other employees have already scheduled PTO, the requesting employee's absence would harm the business due to multiple absences in one work group, and/or the requesting employee's absence would negatively impact the ability of a work group to meet the demands of the current or projected workload. Please plan ahead!

PTO Compensation. CrossCountry Mortgage will pay PTO at the same rate as an Employee's regular hourly rate of pay in effect at the time PTO is taken without reference to commission or bonus income, unless otherwise required by applicable state or local law.

Unused PTO. Employees may rollover/carryover unused hours of PTO into the following calendar year. Once an employee has reached the maximum PTO accrual amount, the employee will not accrue additional PTO hours until the employee uses PTO and the number of PTO hours accrued by the employee drops below the maximum accrual cap, unless otherwise required under applicable state or local law. Unused PTO will be forfeited upon an employee's resignation or termination, for any reason, unless otherwise required by applicable state law.

Transfer of Position. Employees who transfer from a position eligible for PTO to a position not eligible for PTO, acknowledge and understand all remaining unused PTO balance at the time of transfer is forfeited and not payable under any circumstance, unless otherwise required by applicable state law. Employees who transfer from a position not eligible for PTO to a position eligible for PTO will begin accruing PTO after the transition is complete according to the accrual schedule in this paragraph J.

Transfer of Department. PTO-eligible employees who transfer departments from a corporate position to a branch-affiliated position (or who transfer to a corporate position in CA, CO, IL, LA, MA, ME, MT, NE, ND, RI, or Puerto Rico) will transition to the applicable PTO policy (as described above in this paragraph J, accrual basis) at the time in which the transfer is complete, existing unused balances would remain and employees would begin to accrue PTO accordingly. Employees who transfer departments from a branch-affiliated position to a corporate position (or who transfer from a corporate position in CA, CO, IL, LA,

MA, ME, MT, NE, ND, RI, or Puerto Rico to a corporate position in any other State) will transition to the applicable PTO policy (see paragraph I above, allotment schedule), existing unused PTO balances would remain. The Payroll Department will reconcile and upon completion, employees may receive additional PTO on a prorated basis depending on the month in which the transfer occurs once transition is complete according to the allotment schedule defined as “Calendar Year One of Employment Only” in paragraph I above.

K. PAID SICK LEAVE

To the extent that applicable state or local laws mandate the accrual and use of paid sick leave (“PSL”), this policy is intended to ensure that all eligible full-time and part-time employees who regularly work in those jurisdictions receive PSL in accordance with applicable law. PSL under this policy is not being provided in addition to any applicable pre-existing PSL policies, which are now superseded by this policy.

Eligibility. CrossCountry Mortgage employees may be eligible for PSL depending on their physical location. Employees working in a location where applicable state and/or local law requires PSL shall receive PSL according to those requirements.

For more information on those state and/or local jurisdictions where PSL is required, see *Appendix A*. All full-time, part-time, and temporary employees who regularly work in those jurisdictions may be eligible to accrue and use PSL. Please be advised that *Appendix A* is provided for illustrative purposes only. Legal requirements pertaining to PSL may change from time-to-time.

PSL Accrual. Full-time and part-time employees who regularly work in a state or local jurisdiction requiring the accrual and use of PSL may be eligible to accrue PSL, beginning on the first day of employment, according to applicable state or local law as shown in *Appendix A*.

Use of PSL. Eligible employees may use accrued PSL beginning on their 90th day of employment unless otherwise required by applicable law. Eligible employees may use PSL to care for the medical needs of themselves or their families, or where use is consistent with applicable state or local paid leave requirements. The following are examples of permitted uses. At all times, PSL usage should conform to applicable law, which may be amended from time-to-time:

- attend appointments or receive care for the employee’s own physical or mental illness, injury, or medical condition, including conditions requiring home care, professional medical diagnosis or treatment, or preventive care; or
- attend appointments or provide care for an eligible family member’s physical or mental illness, injury, or medical condition, including conditions requiring home care, professional medical diagnosis or care, or preventive care; or
- address the psychological, physical, or legal effects of domestic violence, harassment, sexual assault, or stalking involving an employee or a family member, or, in Seattle, WA, only, a “household member” (including stepparents and stepchildren, grandchildren, current and former spouses and domestic partners, persons who have a child in common, adult persons related by blood or marriage, adult persons who have resided or are residing

- together, and persons 16 years of age or older who are or were residing together and who are or were in a dating relationship); or
- take time off when an employee's place of business or a child's school or place of care has been closed by order of a public official due to a public health emergency or for other health-related reasons; or
 - take time off from work, for employees in New York City only, when an employee or an eligible family member has been the victim of a family offense matter, sexual offense, stalking, or human trafficking; or
 - take time off from work when an employee or a family member is quarantined by a public health authority or health care provider; or
 - take time off from work when an employee in Minneapolis or St. Paul, MN, only must care for a family member whose school or place of care has been closed due to inclement weather, loss of power, loss of heating, loss of water, or other unexpected closure;
 - take time off from work when an employee in Oregon only needs time to bond with or care for a newborn, newly adopted or placed foster child under age 18, or an adopted or foster child over age 18 if incapable of self-care because of a mental or physical disability, if completed within 12 months of birth or placement; or
 - take time off from work when an employee in Oregon only needs time to attend a funeral, make arrangements for, or grieve following the death of a family member within 60 days of death; or
 - take time off from work when an employee in Tacoma, WA, only needs time off for bereavement leave due to the death of a family member; or
 - take time off from work when an employee in California only needs to take time off for bone marrow or organ donation by the employee or a family member; or
 - take time off from work when an employee in Maryland only needs to take time off for maternity or paternity leave; or
 - take time off from work when an employee in New Jersey only needs to take time off in connection with an employee's child to attend a school-related conference, meeting, or other event requested or required by a school administrator, teacher, or other professional staff member responsible for the child's education, or to attend a meeting regarding care provided to the child in connection with the child's health conditions or disability.

Abuse of PSL, including PSL mandated under state or local law, may result in disciplinary action up to and including termination. Employees must use PSL in increments of at least one (1) hour.

Notification to the Company. If the need for PSL is foreseeable, employees should provide advance notice as soon as possible under the circumstances, preferably at least seven (7) days in advance. If the need for PSL is not foreseeable, employees should provide notice of the need for PSL as soon as possible under the circumstances. The requesting employee is responsible for logging approved PSL hours through the online ADP Payroll and Human Resources platform and must ensure that hours for PSL are acknowledged by their direct manager.

Documentation for PSL. The company may require reasonable documentation of the purpose for use of PSL or the use of PSL mandated under state or local law, but

only if the latter is used for more than three (3) consecutive scheduled workdays as permitted by applicable law. If the reason for PSL is due to an employee's or a family member's own medical condition, verification from a health care provider is appropriate, but should not explain the nature of the condition should not result in an unreasonable burden or expense on the employee. If the reason for PSL is due to an employee's need for leave related to domestic violence, verification may include a police report, court order or other evidence from the court or a prosecuting attorney, other documentation from a victim advocate, attorney, member of the clergy, a medical or other professional, or an employee's own written statement.

The company also reserves the right to require documentation verifying an employee's need to use PSL if there are indications of a pattern of abuse, such as repeated use of unscheduled PSL on or adjacent to weekends, holidays, or pay day, regardless whether the employee has used PSL for more than three (3) consecutive days.

PSL Compensation. CrossCountry Mortgage shall compensate the employee for PSL on the payday for the next regular payroll period after the PSL is acknowledged through the ADP Payroll and Human Resources platform. As such, timekeeping documentation should clearly reflect all PSL taken. CrossCountry Mortgage will pay PSL at the employee's regularly hourly rate at the time PSL is taken, unless otherwise required by applicable state or local law.

Unused PSL. PSL may be used during the annual period in which it is received. PSL that is unused at the end of any benefit year will not carry over to subsequent benefit years, except where annual carryover is required by applicable state or local law. For more information on additional carryover requirements, see *Appendix A*. Further, unused PSL at the end of any benefit year or termination or resignation of employment will not be paid out.

Information Regarding PSL Balance. The amount of an employee's accrued and available PSL, in the current pay period and for the year, will appear on each paystub or wage statement. Please review the statement for accuracy and immediately contact Payroll Department if you have questions regarding the statement.

Concurrence with Other Leaves. Absences that qualify under any state or local paid sick leave requirement may also qualify under the federal Family and Medical Leave ("FMLA") or similar state laws. PSL related to such absences will be run concurrently, as permitted by applicable law, with FMLA and state and local leave requirements to which an employee is entitled.

State and Local PSL Compliance. The Company prohibits discrimination and there is no retaliation against employees because of an employee's request for, or use of, legally mandated PSL under state or local law. If you believe that you have been treated unfairly on account of your use of or request for legally mandated PSL, please immediately report this concern to Human Resources so that the matter may be reviewed and appropriate corrective action may be taken.

Definitions. For purposes of this policy, and where consistent with applicable law:

“Children” “Grandparents,” “grandchildren,” “parents,” and “siblings” shall be broadly interpreted to include shall include biological, adopted, and foster relationships, step-relationships, or if relevant, legal wards or legal guardians of an employee or an employee’s spouse, or “in loco parentis” relationships of the employee or an employee’s spouse.

“Eligible family member” shall include an employee’s: (1) spouse, (2) children, (3) parents, (4) grandparents, (5) grandchildren, (6) siblings, and, (7) for employees only in Arizona; Los Angeles, CA; Chicago/Cook County, IL; Michigan; Duluth, Minneapolis, and St. Paul, MN; New Jersey; New York City, NY; or Rhode Island; (7) any individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship, or (8) for Washington, DC, employees only, any person with whom an employee has shared for the preceding twelve (12) months a mutual residence and with whom an employee maintains a committed relationship, (9) for California only, a “designated person,” which is “a person identified by the employee at the time the employee requests paid sick days.” Employees are limited to one “designated person” per 12-month period, or (10) for Massachusetts “member of the employee’s household”, or (11) for Puerto Rico only, a person who is 60 years of age or older, or a disabled individual who is under the employee’s legal custody or guardianship.

“Family offense matter” shall include, **for New York employees only**, an act or threat of an act that may constitute disorderly conduct, harassment, aggravated harassment, sexual misconduct, forcible touching, sexual abuse, stalking, criminal mischief, menacing, reckless endangerment, strangulation, criminal obstruction of breathing or blood circulation, assault, attempted assault, identity theft, grand larceny, coercion under applicable law between spouses or former spouses, or between parent and child or between members of the same family or household.

“Spouse” shall include married partner, domestic partners, registered domestic partners, civil union partners, life partners, or, for employees in Berkeley, Emeryville, Oakland, and San Francisco, CA, only, a designated person of the employee’s choice.

Eligible employees should contact Human Resources with questions concerning whether any of the above definitions apply in a particular jurisdiction.

APPENDIX A (PAID SICK LEAVE)

State	Jurisdiction	Accrual Rate	Maximum Accrual	Annual Carryover	Maximum Annual Use
Arizona	Statewide	1 hr./30 hrs. worked	40 hours annually.	40 hours.	40 hours.
California	Statewide	1 hr./30 hrs. worked	48 hours total.	48 hours.	24 hours.
	Berkeley, CA	1 hr./30 hrs. worked	72 hours total.	Unlimited.	Unlimited.
	Emeryville, CA	1 hr./30 hrs. worked	72 hours total.	72 hours.	Unlimited.
	Los Angeles, CA	1 hr./30 hrs. worked	72 hours total.	72 hours.	48 hours.
	Oakland, CA	1 hr./30 hrs. worked	72 hours total.	72 hours.	Unlimited.
	San Diego, CA	1 hr./30 hrs. worked	80 hours total.	80 hours.	40 hours.
	San Francisco, CA	1 hr./30 hrs. worked	72 hours total.	72 hours.	Unlimited.
	Santa Monica, CA	1 hr./30 hrs. worked	72 hours total.	72 hours.	Unlimited.
	West Hollywood ⁷ , CA	.047 hours of Compensated Leave for each hour worked; 0.039 hours of Uncompensated Leave for each hour worked	48 hours compensated time; 80 hours of uncompensated time.	Up to a maximum of 192 hours compensated time; 80 hours uncompensated time.	Unlimited.
Colorado ⁸	Statewide	1 hr./30 hrs. worked	48 hours annually.	48 hours.	48 hours.
Connecticut ⁹	Statewide	1 hr./40 hrs. worked	40 hours annually.	40 hours.	40 hours.
Illinois	Chicago/Cook Co., IL	1 hr./40 hrs. worked	40 hours annually.	60 hours. ¹⁰	40 hours.

⁷ Only those employees not covered by section (I & J) above, are eligible for leave under this section (K). The 48 hours of compensated time is to be used for vacation. The 80 hours of uncompensated time is to be used for sick leave.

⁸ Eligible employees may use PSL immediately upon accrual.

⁹ Only “service workers” (as statutorily identified by federal Standard Occupational Classification System titles) are eligible for paid sick leave.

¹⁰ Technically, employees in Chicago and Cook County may carry over half their unused PSL up to 20 hours. However, employees who are eligible for FMLA leave may also carryover up to 40 hours of additional unused PSL for FMLA-eligible purposes. But an eligible employee who carries over 40 hours of PSL for FMLA-eligible purposes, and uses it, may not use more than 20 hours of additional PSL during the year.

State	Jurisdiction	Accrual Rate	Maximum Accrual	Annual Carryover	Maximum Annual Use
Maine ¹¹	Statewide	1 hr./40 hrs. worked	40 hours annually .	40 hours.	40 hours.
Maryland	Statewide	1 hr./30 hrs. worked	40 hours annually (total of 64 hours) .	40 hours.	64 hours.
	Montgomery Co., MD	1 hr./30 hrs. worked	56 hours annually .	56 hours.	80 hours.
Massachusetts	Statewide	1 hr./30 hrs. worked	40 hours annually .	40 hours.	40 hours.
Michigan ¹²	Statewide	1 hr./35 hrs. worked	40 hours annually .	40 hours.	40 hours.
Minnesota ¹³	Duluth, MN	1 hr./50 hrs. worked	64 hours annually .	40 hours.	40 hours.
	Minneapolis/St. Paul, MN	1 hr./30 hrs. worked	48 hours annually (total of 80 hours) .	80 hours.	Unlimited.
Nevada ¹⁴	Statewide	.01923 hours for each hour worked	Unlimited at a rate of 0.01923 hours accrued for each hour of work performed.	40 hours.	40 hours.
New Jersey	Statewide	1 hr./30 hrs. worked	40 hours annually .	40 hours.	40 hours.
New Mexico ¹⁵	Statewide ¹⁶	1 hr./30 hrs. worked	Unlimited.	Unlimited.	64 hours.
New York ¹⁷	Statewide	1 hr./30 hrs. worked	56 hours annually .	Unlimited.	56 hours.
Oregon	Statewide	1 hr./30 hrs. worked	40 hours annually .	40 hours.	40 hours.
Pennsylvania	Alleghany County,	1 hr./35 hrs.	40 hours total .	40 hours.	40 hours.

¹¹ The Maine statute is not technically a paid sick leave statute. It provides paid leave for all purposes.

¹² Exclusions apply, including but not limited to the following: Eligible Employee does not include executive, administrative, and professional overtime exempt employees, variable hour employees as defined by 26 CFR 54.4980H-1, individuals employed by an employer for 25 weeks or fewer in a calendar year for a job scheduled for 25 weeks or fewer, and those who work on average less than 25 hours per week.

¹³ The Company shall not take any adverse employment action or in any other manner discriminate against an employee because the employee has exercised in good faith the rights protected under the Duluth, Minneapolis, or St. Paul Sick and Safe Leave Ordinances. If you believe that you have been subject to a violation of the Duluth Sick and Safe Time Ordinance, you may file a complaint with the City Clerk: 218-730-5500 • sicktimeinfo@duluthmn.gov • www.duluthmn.gov/city-clerk/earned-sick-safe-time. Further, an employee's remedy under the Minneapolis Sick and Safe Leave Ordinance is to file a complaint with the Minneapolis Department of Civil Rights. An employee seeking a remedy under the St. Paul Sick and Safe Leave Ordinance may file a complaint with the St. Paul Department of Human Rights and Equal Economic Opportunity or bring a civil action.

¹⁴ The Nevada statute is not technically a paid sick leave statute. It provides paid leave for all purposes.

¹⁵ Eligible employees may use PSL immediately upon accrual.

¹⁶ Effective as of July 1, 2022.

¹⁷ Eligible employees may use PSL immediately upon accrual.

State	Jurisdiction	Accrual Rate	Maximum Accrual	Annual Carryover	Maximum Annual Use
	PA ¹⁸	worked			
	Philadelphia, PA	1 hr./40 hrs. worked	40 hours annually .	40 hours.	40 hours.
	Pittsburgh, PA	1 hr./35 hrs. worked	40 hours annually .	40 hours.	40 hours.
Puerto Rico	Statewide ¹⁹	1 day per mo./at least 130 hrs. worked	12 days annually (total of 27 days) .	15 days.	Same as maximum.
Rhode Island	Statewide	1 hr./35 hrs. worked	40 hours annually .	Unlimited.	40 hours.
Vermont	Statewide	1 hr./52 hrs. worked	40 hours annually .	40 hours.	40 hours.
Washington²⁰	Statewide	1 hr./40 hrs. worked	Unlimited.	40 hours.	Unlimited.
	Seattle, WA	1 hr./30 hrs. worked	Unlimited.	72 hours.	Unlimited.
Washington, D.C.	Statewide	1 hr./37 hrs. worked	40 hours annually (56 hours annually if unless 100+ employees in DC).	Same as accrual cap.	Same as accrual cap.

¹⁸ Effective as of December 15, 2021.

¹⁹ Executive, Administrative, and Professional employees, as those terms are defined by Regulation No. 13 of the Minimum Wage Board of Puerto Rico, are excluded from this policy.

²⁰ Employees in Washington will not be required to use PSL concurrently with other leaves.

L. HOLIDAYS

CrossCountry Mortgage employees who work forty (40) hours or more per week (“full-time”) are eligible for paid holidays immediately at the start of their employment. Holiday schedule is as follows:

- New Year’s Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day
- Christmas Day
- Floating Holiday (to be used anytime throughout the year and scheduled under the same requirements as those for use of PTO)

If one of the above holidays falls on Saturday, it normally is observed on the preceding Friday. If a holiday falls on Sunday, it normally is observed on the following Monday.

Employees working less than forty (40) hours per week are not eligible for Holiday pay.

In the event a holiday occurs during your vacation period, you will have the option of extending your vacation by one day or receiving pay in lieu of the time off.

In the event an employee who is eligible for Holiday pay works any hours on an observed holiday, s/he will be paid all hours worked and holiday pay.

NOTE: Mortgage loan originators party to an Outside Salesperson Employment Agreement are not eligible for paid holidays. Employees eligible for paid holidays will be paid based upon their basic hourly rate of pay without reference to commission or bonus compensation, unless otherwise required by applicable state law.

OTHER BENEFITS

A. INSURANCE COVERAGE

The Company offers a comprehensive, quality medical insurance program that is available to you and your family. Employees working 30 hours per week or more are eligible for medical, dental, and vision benefits as described in the Summary Plan Description and, in addition, are eligible to enroll in voluntary group benefits (i.e., Long-Term Disability, Critical Illness, Group Life and Accidental Death & Dismemberment). Full-time employees working at least 40 hours per week are eligible for the company provided Short-Term Disability, Term Life Insurance, and Accidental Death & Dismemberment (AD&D) Insurance. Additional information on the provided benefits and eligibility are available in the Summary Plan Description, available at any time on our CCM ADP Homepage and CCM Intranet “The Landing”, Employee Center Homepage. Part-time employees working less than 30 hours per week and Temporary employees are not eligible for benefits.

According to the federal Consolidated Omnibus Budget Reconciliation Act (COBRA) of 1985, in the event of your termination of employment with the Company or loss of eligibility to remain covered under our group health insurance program, you and your eligible dependents may have the right to continued coverage under our health insurance program for a limited period of time at your own expense, consistent with applicable laws. Consult Human Resources for details and eligibility requirements.

B. 401(K) SAVINGS PLAN

CrossCountry Mortgage, LLC has a 401(k) Plan, “Employees Savings Trust” provided to all employees. The details regarding the Plan including contributions, vesting, administration, and investments are provided in the Summary Plan Description, which will be distributed upon your eligibility to enroll.

COMPANY EQUIPMENT & PROPERTY

A. COMPANY INFORMATION SYSTEMS: COMPUTERS, INTERNET, ELECTRONIC MAIL, AND VOICE MAIL

CrossCountry Mortgage encourages the use of computers and electronic information as essential tools to support its business. Each employee is responsible for making sure systems are only used for proper business purposes and in a manner, that does not violate CrossCountry Mortgage standards of acceptable workplace behavior and communication. Company systems are to be used to access Company information and other data, to communicate with Company associates, Company partners (e.g., suppliers, distributors, vendors, and customers). Company systems are provided for the Company's information and operational needs, and to facilitate more efficient internal and external communications. Company systems are the property of the Company, including all the information received, sent, accessed through use of, or stored on a Company system. Company systems are to be used to access.

Access to Company systems is a privilege granted to users by the Company which can be revoked in whole or in part at any time by the Company. As such, all associates are expected to ensure the appropriate levels of security at all times. The protection of mobile devices (e.g., laptops, flash drives, Smartphones, removable storage, etc.) is especially important. Those authorized to access Company systems are responsible and will be held accountable for the security of their assigned Company assets.

Users/Employees are not authorized to store any programs, data or information that is not Company property on Company information systems. Any information, content, data, or works that are created, received, accessed, transmitted or stored on Company systems, including those on a user's assigned Company computer, on the Company's computer disks or other storage media, or that are loaded to a User's computer by accessing Company systems, are the sole property of the Company.

The Company will periodically monitor, and may intercept or audit information or communications on Company systems. This may be done at any time, with or without notice, for purposes of ensuring that Company systems are working properly and to check for compliance with this policy. Those persons with access to Company systems should be aware that any communications using company systems and other information that they attempt to delete may still be retained. These deleted items, to the extent they are retained, are also subject to monitoring, interception, ownership and audit by the Company at any time.

Disabling any security software (e.g., antivirus software) that IT or Security has installed and enabled on any system used to connect to Company systems is prohibited.

Properly licensed copies of software will be provided to all users who the Company determines has a need for such software. All requests for software, including upgrades, shall be submitted to IT or provided by authorized Company projects/functions. All software acquired by Company shall be purchased through

or authorized Company Channels. Software acquisition channels are restricted to ensure the Company has a complete record of all software that has been purchased for Information Assets and can register, support, and upgrade such software.

The use of personal cloud-based storage services is strictly prohibited for the storage or transfer of CrossCountry Mortgage information, unless approved by IT. Examples include but are not limited to: Amazon Cloud Drive, Carbonite Online Backup, iCloud, Dropbox.

Company's systems shall not be used to transmit or receive sensitive information or trade secrets outside the scope of your individual responsibilities and without authorization from company management. If such information is transmitted during the normal course of business, appropriate protective measures shall be employed, such as encryption.

User Accounts and E-mail Policy

Employees may not share Account passwords, provide account access to an unauthorized user, or access another user's account without authorization from management. Only authorized users may have access to company systems. Those authorized users are responsible for their login IDs, passwords, and any authorization codes. Security passwords and other access control devices for company systems are required to be kept confidential and are never to be loaned or borrowed. Any security violation or violation of this policy traced to a login ID is the responsibility of the person to whom it was issued.

All e-mails sent and received on CrossCountry Mortgage information systems are the property of CrossCountry Mortgage. Employee e-mails are not private even if the sender or recipient so designates them. CrossCountry Mortgage monitors its e-mail system including employees' mailboxes; and it may access or disclose messages sent over its e-mail system with or without the employee's knowledge or consent.

System Use

Offensive, demeaning, disruptive, or distasteful messages are strictly prohibited. This includes, but is not limited to, messages and pictures that violate CrossCountry Mortgage's policy prohibiting discrimination and harassment.

Posting Company-sensitive information or trade secrets on the Company intranet is prohibited unless approved by appropriate Company management. The Company intranet (Internal Resources) should be used only for Company business-related purposes. Forwarding information on the Company Intranet to unauthorized third parties is prohibited.

Internet e-mail messages are not confidential. Anything sent through the Internet confidentiality of messages may be lost at any point unless the messages are encrypted. Encryption can be accomplished only with prior approval and, if necessary, assistance, from CrossCountry Mortgage's Information Technology Department.

Employees are not permitted to use the e-mail system to send or forward chain letters, or files with large attachments (such as graphics, sound, and video files).

Internet Policy

CrossCountry Mortgage's computer network, including its connection to the Internet, is principally intended for business-related purposes. Employees may not utilize their Internet connections privileges to pursue any outside commercial activities, to seek other employment, or to pursue illegal activities.

Employee use of the Internet is not private. CrossCountry Mortgage can and will monitor employee use of the Internet, including sites and pages visited, at its discretion, with or without notice to the employee.

Users may not establish Internet or other external network connections that might allow unauthorized persons to gain access to CrossCountry Mortgage's systems and information without prior written approval of Senior Management or IT.

Voice Mail

Voice mail is also not private. The Company reserves the right to access all voice mail messages. As with the use of your computer, offensive, demeaning, disruptive or other distasteful voice mail messages are strictly prohibited. This includes, but is not limited to, messages that violate CrossCountry Mortgage's policies on discrimination and harassment.

B. SOCIAL MEDIA

Using Company Information Assets to participate in blogging, discussion groups, posting to social media, mailing lists, chat sessions or other interactive internet offerings that discuss the Company or its business operations, whether directly or indirectly, unless expressly approved by Company Leadership is prohibited. If such discussions are authorized by Company Leadership, users should clearly state when opinions expressed are their own and not those of the Company.

Should employees elect to log onto or access Social Media from CrossCountry Mortgage electronic assets of technology, computers or internet access, employees shall have no expectation of privacy as to any information that they input or review while in contact with Social Media, including passwords, codes or other information that is reviewed or that enables access to the Social Media.

By utilizing Social Media via CrossCountry Mortgage electronic assets of technology, computers or internet access, employees understand that they are providing CrossCountry Mortgage with access to their Social Media and therefore agree that an employee's actions to access Social Media from CrossCountry Mortgage electronic assets of technology, computers or internet access constitutes the employee's understanding that the employee has no expectation in privacy in the Social Media and consents that CrossCountry Mortgage may access the employee's Social Media at CrossCountry Mortgage discretion and may review materials that may be resident on the Social Media, including passwords, text messages, tweets, email communications, .pdfs, and pictures that are sent to employees or reviewed by employees on the Social Media.

Employees should refrain from posting derogatory information about CrossCountry Mortgage on any such sites and proceed with any grievances or complaints through the normal channels. Employees may not post to any on-line forums using any official CrossCountry Mortgage e-mail address or providing any CrossCountry Mortgage telephone number or extension. Employees may not utilize any of CrossCountry Mortgage logos, drawings, trademarks, copyrights or other images or photographs of CrossCountry Mortgage or typically associated with CrossCountry Mortgage in conjunction with such activities. In all postings, employees are responsible for ensuring compliance with all of the company's policies, including its CrossCountry Mortgage Social Media Policy, Anti-Harassment Policy, Personal Use of Company Property Policy, Confidentiality Policy, and Workplace Violence Policy. Failure to comply with company policy may result in disciplinary action up to and including termination of employment. If an employee is unsure about whether a message may violate a law or company policy, he/she should speak with the Human Resources Department prior to posting it.

SOCIAL MEDIA POLICY EXCEPTIONS:

CrossCountry Mortgage understands that social networking, when used properly, can be an effective marketing and business tool. Therefore, some exceptions exist to the above policy for certain employees (generally those with marketing responsibilities) who have been designated in advance by the company's Senior Management and/or President. However, in order to protect our brand image in the community, we have developed the following guidelines for company posts on Social Media sites:

- Only staff authorized to do so by the President may speak for CrossCountry Mortgage. Similarly, only members of the Marketing and Sales team may establish a company presence on a public social network (as previously defined).
- All photos or videos posted to any of CrossCountry Mortgage social media outlets must have a signed Visual/Audio Image Release Form on file prior to posting photos.
- All company and contract provider rules of confidentiality apply.
- Representing personal opinions as those of the company is prohibited.
- All copyright laws must be respected, and employees must reference or cite sources appropriately. (Plagiarism applies online as well.)

C. COMPUTER SOFTWARE (UNAUTHORIZED COPYING)

CrossCountry Mortgage does not condone the illegal duplication of software. The copyright law is clear. The copyright holder is given certain exclusive rights, including the right to make and distribute copies. Title 17 of the U.S. Code states that "it is illegal to make or distribute copies of copyrighted material without authorization" (Section 106). The only exception is the users' right to make a backup copy for archival purposes (Section 117).

The law protects the exclusive rights of the copyright holder and does not give users the right to copy software unless a backup copy is not provided by the manufacturer. Unauthorized duplication of software is a federal crime. Penalties include fines up to and including \$250,000, and jail terms of up to five (5) years.

Even the users of unlawful copies suffer from their own illegal actions. They receive no documentation, no customer support and no information about product updates.

1. CrossCountry Mortgage licenses the use of computer software from a variety of outside companies. The company does not own this software or its related documentation and, unless authorized by the software manufacturer, does not have the right to reproduce it.
2. With regard to use on local area networks or on multiple machines, the use of software shall be in accordance with the software publisher's license agreement.
3. Anyone learning of any misuse of software or related documentation within the company must notify his or her manager.
4. According to the U.S. Copyright Law, illegal reproduction of software can be subject to civil damages and criminal penalties, including fines and imprisonment. CrossCountry Mortgage employees who make, acquire or use unauthorized copies of computer software shall be disciplined as appropriate under the circumstances. Such discipline may include termination.

D. ELECTRONIC DEVICE POLICY

We value our employees and are committed to providing a safe and healthful workplace in order to protect our employees from injuries.

This Electronic Device Policy has been established in order to address the increasing dangers of employee distraction in the work environment from the use of electronic devices. It is critical that employees remain focused on the tasks at hand and do not have any unnecessary distractions while performing their assigned duties.

This policy applies to the use of all electronic devices while performing duties on behalf of CrossCountry Mortgage. This policy includes but is not limited to; answering and making cell phone calls, engaging in cell phone conversations, reading and responding to text messages and emails, reading books, surfing websites and any other use of an electronic device that would create a hazard from employee distraction. Under no circumstances are employees required to place themselves at risk to fulfill business needs.

Vehicle and Driving Requirements

- Use of any electronic devices (including cell phones) while driving any vehicle on behalf of CrossCountry Mortgage is strictly prohibited.
- Turn cell phones off or put on silent or vibrate before operating any vehicle.
- Hands free devices may be permissible if pre-approved by CrossCountry Mortgage and only if use does not create a hazard or distraction.
- Pull off the road to a safe place if a call must be made or received or if adjustments are needed to GPS system.

The improper, careless, negligent, destructive, or unsafe use or operation of equipment can result in disciplinary action, up to and including termination of employment.

E. USE OF COMPANY EQUIPMENT AND VEHICLES (OWNED OR LEASED)

CrossCountry Mortgage' property, tools, and equipment are to be used for business purposes only. Therefore, Company vehicles, machines, phones, computers, copying machines, faxes, etc., are to be used for conducting Company business. You are expected to use proper care when using the company's property and equipment.

All files and other company equipment issued to the employee is the responsibility of the employee.

Operators of company vehicles are responsible for the safe operations, cleanliness, and maintenance scheduling of the vehicle. All operators of CrossCountry Mortgage's vehicles must have a valid driver's license and qualify for placement on the Company insurance policy. In the event of an accident, the police must be contacted, and a police report must be secured at the scene of the accident. Accidents involving a Company vehicle must be reported to Human Resources. Employees are responsible for any moving violations and fines, which may result when operating a company vehicle. The use of seat belts is mandatory for operators and passengers of CrossCountry Mortgage's vehicles.

Employees will be held personally and financially responsible for any and all damages, directly or indirectly, caused by the employee while under the influence or while acting in a careless and/or negligent manner as deemed by CrossCountry Mortgage.

Any misuse of equipment or unauthorized use may subject the user to disciplinary action up to and including termination.

F. REMOVAL OF COMPANY PROPERTY

No Company property may be removed from the premises without prior written approval from your direct report/C-Level, or the President. Any violation of this rule will result in disciplinary action up to and including termination.

G. INSPECTION OF EMPLOYEE PARCELS

Under reasonable circumstances the Company reserves the right to perform inspections and checks of personal or Company property when it is deemed necessary. Such inspections include offices, desks, as well as personal articles, including purses, lunch boxes, brief cases, backpacks, lockers and personal vehicles on Company property.

The Company reserves the right to search Company premises with or without notice. The Company can enter an employee's desk or file cabinet for reasons other than suspicions of theft or a crime, such as the retrieving of documents.

By signing the acknowledgment of receipt of this Handbook, employees expressly agree to searches that require employees to open their personal bags, empty pockets, etc. upon entering or leaving Company property.

Failure of an employee to submit to a search can be cause for disciplinary action up to and including termination.

EMPLOYEE CONDUCT

A. UNLAWFUL HARASSMENT AND SEXUAL HARASSMENT

CrossCountry Mortgage is committed to providing a work environment that is free of discrimination, unlawful and sexual harassment, and retaliation. True equal employment opportunity cannot be accomplished if such behavior permeates throughout the working environment. These types of behaviors can manifest in various forms. For further detail, please refer to CrossCountry Mortgage's Unlawful and Sexual Harassment policy. Employees residing in Puerto Rico may reference Appendix B in Employee Handbook and/or Appendix C in Unlawful and Sexual Harassment policy.

Each Employee, as part of the on-boarding process, is provided the Unlawful and Sexual Harassment Policy. Every employee signs an acknowledgment of understanding and receipt of the policy. The acknowledgment form is placed in the employee's personnel file for recordkeeping.

B. EMPLOYEE WORK RULES

To assure orderly operations and provide the best possible work environment, CrossCountry Mortgage expects employees to conduct themselves professionally and in a manner that will protect the interests and safety of all employees and the organization as well as assure compliance with state and federal laws. It is not possible to list all the forms of behavior that are considered unacceptable in the workplace.

Personal Conduct

Employees should conduct themselves in a professional manner. Employees are expected to approach their work with good conduct, including a willingness to cooperate with co-workers, managers, and clients, in a professional, respectful, polite, and courteous manner. Every employee should strive to make the Company as professional, efficient, and safe as possible.

C. ETHICS AND CONDUCT

The successful business operation and reputation of CrossCountry Mortgage is built on the principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a thorough regard for the highest standards of conduct and personal integrity.

The Company's continued success is dependent upon our customers' trust, and we are dedicated to preserving that trust. Employees owe a duty to CrossCountry Mortgage, its customers and vendors to act in a way that will merit the continued trust and confidence of the public.

CrossCountry Mortgage will comply with all applicable laws and regulations and expects its management, and employees to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter needs to be discussed openly with your immediate manager and the Executive Vice President of Human Resources for advice and consultation.

Compliance with this policy of business ethics and conduct is the responsibility of all employees. Disregarding or failing to comply with this standard of business ethics and conduct may lead to disciplinary action, up to and including termination of employment.

D. EMPLOYEE HONESTY AND INTEGRITY

It is your responsibility to advise your manager or the Executive Vice President of Human Resources, or Chief Information Officer when you observe a person taking company property that does not belong to them, whether it is an employee, a customer, or contractor.

Employees are expected to be honest when handling company funds, material, tools or technology. You are also expected to keep all information about our business confidential. This includes sales volume, advertising and promotion plans, accounting figures, salaries of other employees, etc. You are not permitted to remove any company property, records, equipment, merchandise or supplies from company premises without permission. Nothing in this policy is intended to interfere with an employee's lawful right to discuss his or her own salary with other employees.

In the event employees jeopardize their careers because of dishonest acts or disclosure of confidential information, the company may implement the following procedures in order to protect the rights of innocent employees:

- Thorough questioning and/or investigation in accordance with federal and state laws.
- Restitution will be required and prosecution resorted to when justified.

E. CONFLICT OF INTEREST

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. This policy establishes only the framework within which CrossCountry Mortgage requires employees to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Executive Vice President of Human Resources for more information or questions about conflicts of interest.

An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in personal gain for that employee or a relative as a result of the company's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons related by blood or marriage.

Key employees may be required to sign a statement disclosing any real or potential conflicts of interest. These statements must be updated to disclose any new

conflicts that may develop each year. All other employees are required to disclose potential conflicts as soon as they become aware of them.

No "presumption of guilt" is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative that as soon as possible, they disclose the existence of any actual or potential conflict of interest to the Executive Vice President of Human Resources or the Chief Operating Officer of CrossCountry Mortgage so that safeguards can be established to protect all parties.

Personal gain may result not only in situations where CrossCountry Mortgage does business, but also whenever an employee or relative receives any substantial gift or special consideration as a result of any transaction or business dealings involving the Company.

F. CONFIDENTIALITY OF INFORMATION

Many of our employees have access to valuable information relating to CrossCountry Mortgage' operations, pricing of products and services, customer lists, business methods, credit agreements, financial conditions, future projections, and business plans, etc. This information about the company and its customers is to be guarded by everyone.

The protection of confidential business information and trade secrets is vital to the interests and the success of CrossCountry Mortgage. Such confidential information includes, but is not limited to, the following examples:

- Performance Plan/Job Descriptions
- Customer Lists
- Marketing Strategies
- Financial Information

Human resource files are kept locked when not under the direct supervision of the staff charged with their maintenance.

Employees are responsible for safeguarding information when using computer equipment. Employees must use caution when using passwords and are not permitted to release such information to unauthorized staff.

The privacy of our employees is also confidential. Information concerning insurance claims, financial conditions, etc., is privileged and not to be discussed with other employees, or any person not authorized to have access to it.

Employees may be exposed to confidential information regarding the Company, its affiliates, customers, clients and in some cases other employees in the course of performing their duties. Accordingly, all employees are required to sign a non-disclosure agreement as a condition of employment. Employees who improperly use or disclose trade secrets or other confidential information will be subject to disciplinary action, up to and including termination of employment and legal action, even if they do not actually benefit from the disclosed information.

G. INTERNAL INVESTIGATIONS

From time to time, we may be required to conduct internal investigations pertaining to security, auditing, or work-related matters. Employees are expected to cooperate fully with and assist in these investigations, if requested to do so.

H. FALSE REPORTS

Knowingly making a false report is also a violation. This is not meant to discourage individuals from making good faith reports. Employees should not be reluctant to report information because they are uncertain of who will be believed and whether the allegation can be proved. CrossCountry Mortgage recognizes that possible outcomes of investigations include: (1) that a violation occurred; (2) that no violation occurred; or (3) that CrossCountry Mortgage cannot conclude whether a violation occurred. If a complaint is made in good faith, but no violation is found to have occurred, this does not mean that a complaint or report is a false accusation. However, if CrossCountry Mortgage determines that an employee knowingly made a false report, the employee may be subject to discipline, up to and including discharge.

I. ALCOHOL AND DRUG-FREE WORKPLACE

It is our desire to provide a drug-free, healthful, and safe workplace and to comply with all applicable laws. To promote this goal, employees are required to report to work in appropriate mental and physical condition to perform their jobs in a satisfactory manner. To implement this policy, the Company has adopted the following rules about the use, possession and sale of drugs and alcohol by its employees.

While on Company premises, and while conducting business-related activities for CrossCountry Mortgage off-premises, no employee may use, possess, distribute, sell, or be under the influence of alcohol or illegal drugs. However, employees may use physician-prescribed medications, provided that the use of such medications does not adversely affect job performance or the safety of the client, employee, or other individuals in the workplace and provided such use is otherwise consistent with this policy.

Employees are urged to report immediately any incidents or suspected incidents of drug or alcohol activity, including use or impairment, to their manager. To the extent feasible and consistent with handling the problem, an employee's report of suspected drug activity will be handled in a confidential manner.

We strictly prohibit the use of, being under the influence of, or being impaired by alcoholic beverages, illegal drugs, or controlled substances while on Company property, while on duty regardless of the location, or while operating a vehicle or equipment leased or owned by CrossCountry Mortgage. Violation of this policy may lead to corrective action up to and including termination. Such violation may also have legal consequences.

Definitions:

“Illegal drugs” means any controlled substance listed in schedules I through V of the Federal Controlled Substances Act (21 U.S.C. § 812), medication, or other chemical substance that (1) is not legally obtainable; or (2) is legally obtainable, but is not legally obtained, is not being used legally, or is not being used for the purpose(s) for which it was prescribed or intended by the manufacturer. Thus,

“illegal drugs” may include even over-the-counter medications, if they are not being used for the purpose(s) for which they were intended by the manufacturer. Drugs that are considered legal under state law but remain illegal under federal law, including medicinal and/or recreational marijuana, are considered an illegal drug for purposes of this policy.

“Legal Drugs” means prescribed or over-the-counter drugs that are legally obtained by the employee and used for the purpose(s) for which they were intended by the manufacturer. “Legal drugs” does not include medically-prescribed marijuana.

“Company property” means all property, buildings, equipment, machinery, and vehicles owned, leased, rented, or used by the Company.

Legal Drugs / Medication:

Any employee who has reason to believe that the legal use of drugs, such as a prescribed medication, may pose a safety risk to any person or interfere with the employee’s performance of his or her job must report such legal drug use to his or her direct manager or the Human Resources Department. The Company shall then determine whether any work restriction or limitation is indicated. Failure to report the legal use of a drug that may pose a safety risk could result in disciplinary action.

Drug Testing:

If an employee’s manager has a reasonable suspicion that the employee is working in an impaired condition or otherwise engaging in conduct that violates this policy, the employee will be asked about any observed behavior and offered an opportunity to give a reasonable explanation. If the employee is unable to explain the behavior, he or she will be asked to take a drug test in accordance with the procedures outlined below. Further, we reserve the right to implement a screening program for applicants and/or transferees for identified job categories where the use/abuse of controlled substances and/or alcohol would be of concern given the nature and duties of the identified job. If the employee refuses to cooperate with the administration of the drug test, the refusal will be handled in the same manner as a positive test result.

CrossCountry Mortgage reserves the right to test employees:

- When a reasonable suspicion exists that an employee is under the influence of any controlled substance, drug or alcohol while on the job, or is otherwise in violation of this policy. Reasonable suspicion means suspicion based on information regarding the appearance, behavior, speech, attitude, mood, or breath odor of the employee;
- After an offer of employment, but before the applicant commences employment;
- When an employee is found in possession of any controlled substance, drug or alcohol in violation of this policy; or
- When an accident, near-miss or similar incident occurs, and a reasonable suspicion exists that the incident occurred because the employee involved was under the influence of alcohol, a controlled substance or a drug.

Substance Abuse Treatment:

No employee will be subject to discipline for voluntarily seeking substance abuse treatment. But, an employee's participation in a substance abuse treatment program will not excuse the employee from being required to meet all of the same standards and qualifications for the job that apply to other employees, including performance, attendance, and other measures.

J. INJURY AND ILLNESS PREVENTION POLICY (WORKPLACE SAFETY)

CrossCountry Mortgage is committed to providing a safe and healthful work environment for its employees, customers and visitors. Some of the best safety improvement ideas come from employees. Those with ideas, concerns or suggestions for improved safety in the workplace are encouraged to communicate them with their Manager. All reports and concerns about workplace safety issues may be made without fear of reprisal.

In keeping with this commitment, the Company has established an "Injury and Illness Prevention Program (IIPP)" as part of its safety program. The Executive Vice President of Human Resources (the safety manager) has been delegated responsibility for administering and implementing appropriate safeguards to ensure a safe work place, in accordance with our IIPP.

Compliance is Essential:

Employees must understand that compliance with safety requirements is a condition of employment and will be evaluated, together with other aspects of an employee's performance, as part of the performance appraisal process. Each employee is expected to obey safety rules and exercise caution in all work activities. Employees must immediately report any unsafe condition to the appropriate manager. Employees who violate safety standards, who cause hazardous or dangerous situations or who fail to report or, where appropriate, remedy such situations, may be subject to corrective action up to and including dismissal.

Reporting Unsafe Conditions and Risks:

Whenever an employee identifies an unsafe condition or an occupational safety and health risk, the employee should report the matter immediately to his or her direct manager if he or she is unable to remedy the situation. If the direct manager is not readily available, the employee should immediately inform the Human Resources Department so that any dangerous condition can be corrected. Employees are strongly encouraged to report any situations of this nature and need not fear any form of reprisal as the result of their compliance with this policy. Employees who identify any hazards in the work place can also choose to report the situation anonymously if they prefer not to identify themselves.

In the case of accidents that result in injury, regardless of how insignificant the injury may appear, employees must immediately notify their manager and the Executive Vice President of Human Resources. An incident report form must be completed as soon as possible and forwarded to the designated person in charge. Such reports are necessary to comply with laws and initiate insurance and workers' compensation benefit procedures. Incident report forms should be completed for any accident regardless of the involvement of the employees, clients, customers, or visitors.

Inspections

Representatives of the Company may also conduct periodic inspections to identify unsafe conditions and work practices and will also investigate occupational injuries and illnesses. When appropriate, the Company may utilize the services of outside representatives to conduct investigations where it believes that it will be helpful in our attempts to promote the interests of safety in the workplace. Every effort will be made to correct unsafe or unhealthy conditions, work practices, or procedures in a timely manner. It is therefore essential that all employees cooperate in achieving these objectives and assist the Company to provide a safe workplace for everyone.

Entering and Leaving the Premises

At the time you are hired, you will be advised about the proper entrances and exits. Our insurance company prohibits unescorted or unauthorized visitors in our facilities. If you are expecting visitors, such as clients, or friends, please ensure they are escorted at all times.

Security

Maintaining the security of CrossCountry Mortgage buildings and vehicles is everyone's responsibility. Develop habits that ensure security as a matter of course. For example:

- Always keep cash properly secured. If you are aware that cash is insecurely stored, immediately inform the person responsible.
- Always have two (2) individuals in the office at any given time.
- Know the location of all alarms and fire extinguishers, and familiarize yourself with the proper procedure for using them, should the need arise.
- When you leave Company premises make sure that all entrances are properly locked and secured.

In Case of Fire

If you are aware of a fire, you should:

- Dial 911 or the local fire department.
- If possible, immediately contact your manager. Evacuate all employees from the area.
- If the fire is small and contained, locate the nearest fire extinguisher. This should only be attempted by those who are knowledgeable in the correct use of fire extinguishers.
- If the fire is out of control, leave the area immediately. No attempt should be made to fight the fire.

When the fire department arrives, direct the crew to the fire. Do not re-enter the building until directed to do so by the fire department.

Emergency Evacuation

All employees must be familiar with the location of emergency exits. The employees must also be familiar with the appropriate responses that are to be taken in the event of a building evacuation. If you are advised to evacuate the building, you should:

- Stop all work immediately.
- Contact outside emergency response agencies, if needed.
- Shut off all electrical equipment and machines, if possible.

- Walk to the nearest exit, including emergency exit doors.
- Exit quickly, but do not run. Do not stop for personal belongings.
- Proceed, in an orderly fashion, to a parking lot near the building. Be present and accounted for a possible roll call. Do not re-enter the building until instructed to do so.

Reporting Work Related Injuries

If you are injured on the job, no matter how slightly, report the incident immediately to your manager. Failure to do so may result in disciplinary action up to and including termination of employment. We ask for your assistance in alerting management to any condition that could lead or contribute to an employee accident.

Cooperation and Questions

Employees may occasionally be asked to assist or participate in inspections, the correction of unsafe or unhealthful conditions, or training programs and activities. Full cooperation by all employees is necessary to the accomplishment of our goals. Employees should direct any questions they have regarding their obligations under the Company's safety policies to the safety manager.

K. HOUSEKEEPING

A clean and orderly workplace is more pleasant for everyone and is essential for safety, quality work, and fire prevention. Good housekeeping is everyone's responsibility. Please do your part by keeping your workspace neat and clean to reduce the chance of accidents and the possibility of fire. Do not leave dirty dishes liquids or food on your desk or in your work area.

Cluttered aisles present a safety hazard and detract from a well-kept appearance. Use waste receptacles and discard material that is no longer useful. Never throw paper, bottles, cans or other trash on the floor, grounds, loading docks or in the parking lots.

If we all cooperate, housekeeping will not be a problem for anyone.

L. WORKPLACE VIOLENCE PREVENTION

We are committed to preventing workplace violence and to maintaining a safe work environment. CrossCountry Mortgage has adopted the following guidelines to deal with intimidation, harassment, or other threats of, or actual violence that may occur during business hours or on its premises/company property.

All employees, including managers and temporary employees, should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting, "horseplay," or other conduct that may be dangerous to others. Firearms, weapons, and other dangerous or hazardous devices or substances are prohibited from Company premises.

Conduct that threatens, intimidates, or coerces another employee, a customer, or a member of the public at any time, will not be tolerated. This prohibition includes all acts of harassment, including harassment that is based on an individual's sex, race, age, or other characteristic protected by federal, state, or local law.

All threats of violence or actual violence, both direct and indirect, should be reported as soon as possible to your immediate Manager or any other member of management. This includes threats by employees, as well as threats by customers, vendors, solicitors, or other members of the public. When reporting a threat of violence, an employee should be as specific and detailed as possible.

All suspicious individuals or activities should also be reported as soon as possible to a manager. An employee should not place himself or herself in peril – e.g., should not try to intercede in a disturbance in the workplace.

We will promptly and thoroughly investigate all reports of threats of violence or actual violence and of suspicious individuals or activities. The identity of the individual making a report will be protected as much as is practical. In order to maintain workplace safety and the integrity of its investigation, we may suspend employees, either with or without pay, pending investigation.

Anyone determined to be responsible for threats of violence or actual violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment. CrossCountry Mortgage encourages employees to bring their disputes or differences with other employees to the attention of their manager and the Executive Vice President of Human Resources of CrossCountry Mortgage before the situation escalates into potential violence. We are committed to assisting in the resolution of employee disputes and will not discipline employees for raising such concerns.

M. POSSESSION OF WEAPONS

Employees are prohibited from possessing or storing any weapon or other dangerous item (1) on CrossCountry Mortgage property; (2) in the workplace; or (3) while conducting Company-related business on or off property controlled by the Company regardless of whether the employee is licensed to own or carry the weapon. Employees are prohibited from possessing or storing any weapon or other dangerous item in any vehicle used for Company-related business. Nothing in the State's Concealed Weapons Law changes this policy.

The term "weapons" includes, but is not limited to, handguns, firearms, knives, explosives, mace, stun guns or other dangerous items.

All employees are required to report the presence of a weapon on Company property to Human Resources. Employees who violate this Policy will be subject to disciplinary action up to, and including immediate termination from employment.

N. COMPLIANCE WITH THE LAW

CrossCountry Mortgage has a moral and ethical responsibility to the well-being of the community it serves. To that end, CrossCountry Mortgage will cooperate with and assist law enforcement agencies to the fullest extent possible, when confronted, concerning investigations or apprehensions of one of our employees. Further, should an employee violate any of the rules and guidelines contained within this Handbook CrossCountry Mortgage will attempt restitution and/or prosecution to the fullest extent of the law.

O. PROBLEM RESOLUTION

CrossCountry Mortgage expects its managers to provide you fair and impartial treatment without favoritism and/or personal bias. At the same time CrossCountry Mortgage expects you to make a sincere effort to promote harmony in the efficient operation of the Company. Experience teaches, however, that problems may arise from time to time. It is our desire to do our very best to resolve such problems; therefore, we have developed an internal problem-solving procedure.

1. If you have a problem or complaint with a co-worker, it is encouraged that first attempt of resolution to be on an employee to employee level. Most problems and complaints can and should be resolved at this level.
2. If resolution is not attained, discuss it with your manager immediately. It is an important part of his/her job to deal thoroughly and promptly in resolving problems. Due to his/her understanding of the situation, he/she ought to be the best equipped to help resolve the problem.
3. If you prefer not to discuss your problem or complaint with your manager, or after discussing it with your manager, you do not believe that it was resolved, you may discuss the matter with the Executive Vice President of Human Resources.
4. The Executive Vice President of Human Resources will thoroughly review your problem and discuss it with the appropriate parties concerned and find resolution.

This policy has been established for the expressed purpose of resolving problems. It will be administered so that you will not be penalized or otherwise suffer in any way for using this procedure for legitimate reasons. It is our sincere belief that the prompt and effective use of the problem-solving procedure will help to maintain harmonious relations among all employees at CrossCountry Mortgage.

EMPLOYMENT TERMINATION

CrossCountry Mortgage operates under the principle of at-will employment. This means that neither you nor CrossCountry Mortgage has entered into a contract regarding the duration of your employment. You are free to terminate your employment with CrossCountry Mortgage at any time, with or without reason. Likewise, CrossCountry Mortgage has the right to terminate your employment, or otherwise transfer, discipline, or demote you at any time, with or without reason, at the discretion of CrossCountry Mortgage.

Although your employment is at-will, and you are free to terminate your employment at any time without notice, it is requested that you provide at least two (2) weeks' notice in the event of your resignation. CrossCountry Mortgage reserves the right to accept any resignation immediately. Employee healthcare coverages, if applicable, will end on the last day of the month in which separation of employment occurs. Employee voluntary coverages, if applicable, will end on Employee's last day of employment.

A. RETURN OF PROPERTY

Any or all CrossCountry Mortgage property issued to you, such as product samples, computer equipment, keys or CrossCountry Mortgage credit card must be returned to CrossCountry Mortgage at the time of your termination. You will be responsible for any lost or damaged items.

B. POST-EMPLOYMENT INQUIRIES

CrossCountry Mortgage does not respond to verbal requests for references. In the event your employment with CrossCountry Mortgage is terminated, either voluntarily and/or involuntarily, the policy of CrossCountry Mortgage is one of verification only of title and dates of employment. As an employee of CrossCountry Mortgage, do not under any circumstances respond to any requests for information regarding another current or former employee.

Due to privacy requirements, all inquiries concerning current or former employees from outside sources should be directed to Human Resources. All other employees are prohibited from providing information about coworkers to any outside source. Only Human Resources is authorized to provide references or information concerning our employees.

CLOSING SUMMARY

A. HANDBOOK CHANGES

This Handbook cannot anticipate every situation or answer every question about employment. In order to retain necessary flexibility in the administration of policies and procedures, the Company reserves the right to revise, modify, supplement or rescind any policies, practices, procedures, and benefits described in this Handbook, other than the at-will employment provisions, at any time with or without notice. Details of those changes will be made available in the updated Employee Handbook and posted on CCM ADP Homepage and CCM Intranet “The Landing”, Employee Center Homepage. Please direct any questions regarding those changes to your manager and/or the Executive Vice President of Human Resources.

B. SUMMARY

We are happy that you have selected CrossCountry Mortgage as your employer of choice! Your joining the CCM teams yields many opportunities for individual satisfaction and growth.

CROSSCOUNTRY MORTGAGE

ACKNOWLEDGEMENT OF EMPLOYEE HANDBOOK RECEIPT

(EMPLOYEE COPY)

The contents of this Employee Handbook are presented as a matter of information only and supersede any previous policies. While they correctly describe the current policies, procedures, and benefits of CrossCountry Mortgage, they do not create any vested rights for CrossCountry Mortgage employees. CrossCountry Mortgage reserves the right, in its sole discretion, to modify, revoke, suspend, terminate, or change any or all such policies, procedures, or benefits, in whole or in part, at any time, with or without notice.

Nothing contained in this Handbook shall be construed as a contract of employment for a specific term or duration between CrossCountry Mortgage and any one or more of its employees. Just as you may voluntarily leave at any time, your employment may be terminated at any time with or without cause.

No employee, manager, or officer of CrossCountry Mortgage, other than the President, has any authority to offer, or enter into, an agreement for employment for a specific period of time with CrossCountry Mortgage employees or applicants, or to make any agreement contrary to the above policy. Any such agreement must be expressly stated in writing and signed by the President.

The CrossCountry Mortgage, LLC Employee Handbook is available on the CCM ADP Homepage and CCM Intranet “The Landing”, Employee Center Homepage, it is important that you familiarize yourself with the contents of the Employee Handbook.

To ensure that your understanding of this subject is as complete as possible, please do not hesitate to discuss any human resource policies or procedures with your manager or Human Resources.

Please acknowledge your receipt of the Employee Handbook by signing below. This acknowledgment also constitutes your express agreement to a search of your personal property, pursuant to the Company’s search policy.

Employee’s Signature

Date

Employee’s Printed Name

Job Title

CROSSCOUNTRY MORTGAGE

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(COMPANY COPY)

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Employee's Signature

Date

Employee's Printed Name

Job Title

APPENDIX B (PUERTO RICO)

A. POLICY AGAINST WORKPLACE HARASSMENT/BULLYING

The Company has a strict policy prohibiting what is known as “workplace harassment” or “bullying” and has adopted this policy pursuant to the “Act to Prohibit and Prevent Workplace Harassment in Puerto Rico,” Law No. 90-2020.

Additional Remedies. Under applicable law, any employee that wishes to file a claim in court for workplace harassment must first report the matter through the Company’s internal reporting procedures, immediately to Employee’s manager, the Executive Vice President of Human Resources, and/or the Legal Department. All managers must report any complaints to the Executive Vice President of Human Resources, so the Company may conduct a thorough investigation. CrossCountry Mortgage takes all complaints and concerns seriously, which will be handled promptly. If the concern is about a manager, or if it seems more appropriate to the employee, he or she may contact the Executive Vice President of Human Resources. Employees can raise concerns, make reports or participate in an investigation without fear of reprisal or retaliation of any kind. Anyone found to be engaging in any type of unlawful harassment or retaliation will be subject to disciplinary action, up to and including termination of employment. If the steps taken in accordance with this process are unsuccessful, the employee must then exhaust efforts before the Bureau of Alternative Methods for the Resolutions of Conflicts of the Judicial Branch of Puerto Rico, <https://www.poderjudicial.pr/index.php/negociado-de-metodos-alternos>. If, after receiving orientation, mediation is not accepted or not recommended, the employee may seek relief before a court of law and must certify that the employee exhausted internal remedies before the Company and external remedies before the Bureau of Alternative Methods. An employee has one year to file a claim as of the moment the employee feels subjected to harassment and may be eligible for the remedies established in Law 90-2020 if they prevail in their claim.

B. PROTOCOL FOR THE MANAGEMENT OF DOMESTIC VIOLENCE IN THE WORKPLACE

Justification and Purpose. Domestic violence is a problem, which may spread into, and bring dangerous situations to the workplace. Law No. 217 of September 29, 2006, was enacted to strengthen the efforts to prevent and intervene in such cases.

Amongst acts that may constitute domestic violence in the workplace are: intimidation; harassment or threats to a person in the workplace through regular mail, electronic mail (“e-mail”), fax, telephone or in person; and physically hurting someone during working hours or when the person is arriving at or leaving from work. Acts of domestic violence in the workplace represent a danger, not only to the victim of domestic violence, but also to other workers and visitors in the same place.

Although there is no way to prevent with absolute certainty domestic violence in the workplace, the Company is committed to maintaining a safe workplace environment for all its employees. Thus, the Company has established a zero-tolerance policy regarding domestic violence in the workplace. This Protocol is aimed at establishing measures and procedures to follow when an employee considers himself/herself a victim of domestic violence in the workplace.

Legal Basis. The Company's zero-tolerance policy towards domestic violence and this protocol have been established and is implemented and enforced pursuant to the following provisions:

- Article I, Section 1 of the Constitution of the Commonwealth of Puerto Rico, which provides that the dignity of the human being is inviolable.
- Article I, Section 16 of the Constitution of the Commonwealth of Puerto Rico, which recognizes the right of every working person to be protected from risks to the person's health and personal integrity in the workplace.
- Law No. 20 of April 11, 2001, as amended, which created the Office of the Solicitor for Women, and provides that said Office shall oversee that the public policy established by the statute and that women's rights are protected. Under the Law, the Office must ensure that public and private entities take affirmative steps to guarantee gender equality in areas where inequalities and oppression persist, including domestic violence.
- Law No. 54 of August 15, 1989, for the Prevention of Domestic Violence, as amended, ("Law No. 54") which repudiates domestic violence and recognizes that domestic violence is one of the most serious and complex current issues.
- Law No. 16 of August 5, 1975, as amended, which requires that employers provide a workplace free of known dangers including death and physical harm to its employees.
- Law No. 100 of June 30, 1959, as amended by Law No. 217 of December 17, 2006, which protects employees and applicants against discrimination based on being a victim or perceived to be a victim of domestic violence.
- Law No. 284 of August 24, 1999, as amended, which prohibits harassment to intimidate a person to the extent that the person or any other member of the person's family or their property may be harmed.
- Law No. 538 of September 30, 2004, which provides that an employer may seek a protective order for an employees if the employee is or has been a victim of domestic violence, as defined in Act. No. 54, and the violence occurred in the workplace. Before initiating this process, the employer must notify the employee of its intention to seek the protective order.

Definitions. For purposes of this policy, the following terms will have the following meanings:

- Domestic violence – The use of physical force, psychological or sexual violence, intimidation, or persecution against a person by the person's partner to cause physical harm to the person or to the person's property or against third parties in order to cause severe emotional harm to the person.

- Partner – Means a spouse, former spouse, boyfriend, girlfriend or a person with whom another cohabits, maintains a consensual intimate relation or has procreated a child with including same sex partners.
- Protective Order – Means any mandate issued by a court to prevent a person who commits acts of domestic violence from continuing to commit such acts.
- Victim – Any person who has been subjected to acts of domestic violence.
- Workplace – The space in which a person carries out the main functions as an employee and which is under the control of the employer.

Designation and Personnel in Charge of Domestic Violence Situations. The Company hereby designates Executive Vice President of Human Resources as the person(s) in charge of handling domestic violence situations in the workplace. This team shall have the following responsibilities, in addition to the job functions already ascribed to the positions:

- Shall coordinate the orientation of employees regarding the existence of this policy.
- Shall provide support to management in the handling of domestic violence situations in the workplace.
- Shall provide information regarding safety alternatives to employees who are victims of domestic violence.

In case such person is not available, the person will be substituted by a Human Resources team member, for purposes of complying with the responsibilities ascribed under this policy. In addition, the Company designates the manager on duty to handle domestic violence situations that may arise in the workplace, and to address these situations.

The designated person shall work with the manager who shall:

- Receive orientation regarding domestic violence and the implementation of security measures.
- Attend to and channel those domestic violence situations that are communicated by a person who is being affected by the domestic violence situation.
- Provide information to the victim regarding security measures in the workplace and advise the employee on the options available under Law No. 83-2019, which provides special leave for employees with situations of domestic or gender-based violence, child abuse, sexual harassment at work, sexual assault, lewd or stalking acts in their felony form.
- Coordinate the adoption of applicable security measures.

Preventive Security Measures, Procedures and Uniform Measures to Follow

1. Any employee that is a victim of domestic violence and who fears for their safety shall as a first step seek a protective order from a court.
2. Once the employee obtains the protective order the employee shall notify Human Resources and/or the employee's manager about the protective order so that they are aware of the order and may take any appropriate measure to prevent or manage a situation of domestic violence in the workplace with regards to that employee and to receive information and support to deal with the domestic violence situation. The Company will do everything it reasonably can to comply with the orders contained in the protective order.
3. Any employee may notify Human Resources about any domestic violence situation that may endanger the safety of any employee in the workplace so that the Company may take the corresponding security measures.
4. Security measures taken do not guarantee absolute protection against violent acts of domestic violence, but they serve as a tool to help reduce the risks of such acts. The security measures taken will depend on the specific circumstances of the situation. Amongst the possible measures that can be taken are:
 - (a) Identify paid and unpaid leaves available under the law in case the victim of domestic violence has to take time off from work in connection with the domestic violence situation, as long as all requirements to take the leave are met. See the Special Leave Law for Victims of Abuse section in this Addendum.
 - (b) Transfer the victim to another area in the workplace, if business necessity so permits, there is a vacancy and the employee consents.
 - (c) Make changes to the employee's work schedule, if business necessity so permits and the employee consents.
 - (d) With the employee's consent, alert the persons who are in charge of answering telephones of possible threatening phone calls.
 - (e) Request that the victim retain as evidence copies of all documents which contain threats sent through mail, fax, e-mail and/or other means.
 - (f) Keep the protective orders provided by the victim, as confidential records.
 - (g) Consider seeking a protective order in favor of the victim.

Steps to Follow When the Act of Domestic Violence occurs in the Workplace. When the act of domestic violence occurs in the workplace during working hours, the Company may:

1. Have its managers and/or the security personnel be notified immediately to take whatever reasonable security measures may be available.
2. Call the police (911) to request assistance.
3. Identify, to the extent possible, a safe place for the victim.
4. Call for medical help, if necessary.

If an employee commits acts of domestic violence in or from the workplace, including through the fax, telephone or e-mail, the employee will be disciplined, up to and including immediate termination.

Confidentiality. To the extent possible, all information offered by an employee who is a victim of domestic violence, related to the domestic violence situation, will be kept confidential, keeping in mind that in order to implement the security measures contained in this policy certain people will have to be informed of the situation.

Reasonable Accommodation. Employees may request reasonable accommodation or flexible work conditions to address an abuse situation. Examples of accommodations include change of work location, modification of tasks assigned to the employee, change in working times, or others that allow the employee to obtain the necessary assistance to address an abuse situation.

No Retaliation and Discrimination. It is the responsibility of all employees not to incur in acts of domestic violence nor to retaliate or discriminate against individuals who are victims of domestic violence. The Company will not tolerate any form of discrimination against victims of domestic violence, sexual aggression or stalking. In addition, the Company will not tolerate that an employee who files a domestic violence complaint or who assist or participates in any way in the investigation of domestic violence be subjected to retaliation. If an employee retaliates and/or threatens to retaliate, the Company will take the appropriate corrective and disciplinary action, against that employee up to and including termination.

Any employee who believes they have been a victim of discrimination or retaliation in violation of this policy shall immediately contact Human Resources and the employee's immediate manager.

C. SEXUAL HARASSMENT PROTOCOL

Legal Basis. This Protocol is adopted under the following statutes:

- Section 1 of Article II of the Constitution of Puerto Rico provides that the dignity of the human being is inviolable, that all persons are equal before the law and prohibiting discrimination based on race, color, sex, birth, origin or social condition, or political or religious ideas.
- Section 8 of Article II of the Constitution of Puerto Rico establishes the protection against attacks to the honor, reputation and privacy or family life of all persons.

- Section 16 of Article II of the Constitution of Puerto Rico recognizes the right of all workers to be protected against risks to their health or personal integrity in their employment.
- Law No. 100 of June 30, 1959, as amended, known as the "Law Against Discrimination in Employment," protects employees and job applicants against discrimination based on sex, for being a victim or perceived as a victim of domestic violence, sexual assault, stalking, among other kinds of discrimination.
- Law No. 16 of August 5, 1975, as amended, "Law of Safety and Health at Work", provides that each employer must provide each of its employees a workplace free of recognized risks that cause or may cause death or physical harm to the employees.
- Law No. 69 of July 6, 1985, as amended, requires strict compliance with the constitutional guarantee against discrimination based on sex, by prohibiting specific actions that promote discrimination, establishing responsibilities and imposing penalties.
- Law No. 17 of April 22, 1988, as amended, known as the "Law to Prevent Sexual Harassment in Employment" ("Law No. 17") prohibits sexual harassment in employment and places the responsibility on employers to establish clear policies against sexual harassment in employment and to ensure that employees work in safe and dignified environment. Article 15 of Law No. 17 requires the promulgation and implementation of a Protocol to Manage Situations of Sexual Harassment in Places of Work or Employment.
- Law 284-1999, as amended, "Law Against Stalking in Puerto Rico", defines stalking as "a conduct through which surveillance is exercised over a certain person, unwanted verbal or written communications are sent to a certain person, written, verbal or implicit threats are made to a certain person, acts of vandalism are carried out directed at a certain person, repeated harassment is carried out through words, gestures or actions aimed at intimidating, threatening or persecuting the victim or members of his family", and establishes penalties for those who incur in this type of criminal conduct. In addition, it provides the procedure for the issuance of protective orders.
- Law 83-2019, "Special Leave Law for Employees with Situations of Domestic or Gender Violence, Child Abuse, Sexual Harassment at Work, Sexual Assault, Lewd Acts or Stalking in its Serious Form", grants up to fifteen (15) days of leave without pay per year to employees to deal with situations of violence, and establishes the right to request reasonable accommodations or flexible working conditions for victims.
- At the federal level, Title VII of the Civil Rights Act of 1964, as amended, prohibits discrimination based on sex. The Guidelines on Discrimination based on sex, published by the Equal Employment Opportunity Commission (EEOC), establish sexual harassment as a form of discrimination based on sex.

Scope. The provisions of this policy apply to all employees of the Company in Puerto Rico, regardless of their level, position or hierarchy, as well as to any other person who is not an employee, but whose conduct constitutes an act of sexual harassment towards any of the people who provide services to the Company. In addition, the policy to prevent and repudiate sexual harassment in employment applies to job candidates and visitors.

Any employee, job applicant, or visitor who believes that he or she has been the victim of sexual harassment at work; who has witnessed an act or who receives information of an act against another person, by any of the aforementioned persons, may file a complaint following the procedure established in this policy.

Definitions. The language of this policy has been drafted without distinction of sex, sexual orientation or gender identity, so it applies to everyone equally. Neutral terms included in this policy include feminine and masculine; and those used in the masculine gender also include the feminine and the neuter. The omission of one gender does not mean the dominance of the other.

For purposes of this policy, the following terms have the meanings indicated below:

- **Employee:** Any person who works for the Company and receives compensation for it or any applicant for employment. It also includes a person who completes an internship carrying out work for educational or training purposes, regardless of whether he/she receives compensation.
- **Serious emotional damage:** When, as a result of sexual harassment at work, the person recurrently manifests one or more of the following characteristics: paralyzing fear, feelings of helplessness or hopelessness, feelings of frustration and failure, feelings of insecurity, helplessness, isolation, low self-esteem, or other similar conduct resulting from repeated acts or omissions.
- **Intimidation:** Any action or word that, manifested recurrently, has the effect of exerting moral pressure on the spirit of a person who, for fear of suffering some physical or emotional damage to his/her person, property or another person is forced to carry out an act contrary to his/her will.
- **Investigation:** Process in which an investigator is empowered to investigate a specific fact or situation related to a complaint alleging acts of sexual harassment at work. This investigator will have the power to take statements from the parties involved, witnesses or any person who has knowledge of the alleged facts. Likewise, the investigator will have the power to collect documents and any type of evidence related to the facts evaluated with the purpose of rendering a report.
- **Investigator:** The person in charge of carrying out the investigation of a sexual harassment complaint. This person can be an employee or an independent contractor. It cannot be related to any of the parties involved in the complaint and must demonstrate independence to formulate his/her recommendations. The investigator may be the highest-ranking official when not related to the facts of the complaint.

- Workplace: Any space in which a person performs functions as an employee and the surroundings of that space. When it comes to a building or physical structure, it includes the surrounding spaces, such as outdoors areas and parking.
- Complaint: Verbal or written complaint about sexual harassment in the workplace, which must be presented to the immediate manager or to the office designated for these purposes.
- Employer: Cross Country Mortgage, LLC.
- Persecution or persecute: Keeping a person under surveillance, repeatedly harassing him/her through words, gestures or violent actions aimed at intimidating, threatening or persecuting the victim or members of his/her family.
- Person: Natural or legal person.
- Manager: Any company employee who exercises some control at work and whose recommendation is considered for hiring, classification, dismissal, promotion, transfer, compensation decisions, or on the schedule, place or working conditions, or on tasks or functions that are performed or may be performed by an employee or group of employees or on any other terms or conditions of employment; any person who carries out supervisory tasks on a day-to-day basis. Any other person of equal or higher rank when the immediate manager is part of the sexual harassment complaint.
- Visitor: Any person who is not an employee of the Company and who comes to provide or receive any service, accompany or carry out any management in the Company's facilities.

Definition of Sexual Harassment in the Employment. Article 3 of Law No. 17 provides that sexual harassment in employment consists of any type of unwelcomed sexual advance, requests for sexual favors and any other verbal or physical conduct of a sexual nature or that is reproduced using any means of communication including, but not limited to, the use of communication tools, multimedia through the cybernetic network or by any electronic means, when one or more of the following circumstances occur: (i) when submitting to such conduct implicitly or explicitly becomes a term or condition of a person's employment; (ii) when submission to or rejection of such conduct by the individual becomes the basis for employment or employment-related decisions affecting that individual; or (iii) when such conduct has the effect or purpose of unreasonably interfering with that person's job performance or creates an intimidating, hostile, or offensive work environment.

Sexual harassment applies to situations in which the prohibited conduct occurs between persons of the same sex or between persons of the opposite sex. For the purposes of this policy, the conduct described is prohibited regardless of the manner in which it is manifested between the sexes. Sexual harassment involves any type of approach or pressure of a sexual nature, whether physical, verbal or virtual, unwanted, that arises from the employment relationship and that, in turn, results in a hostile, tense and difficult environment to perform the functions of the post. Sexual harassment can be

expressed in a variety of ways, which could lead to serious emotional harm or intimidation.

Both the statutory and case law have recognized two forms of sexual harassment. The first of these is the “give and take”, also known as the “quid pro quo.” An example of this modality is that an employee or job candidate is promised a modification to the work relation or conditions in exchange for accepting a sexual request of any kind or that he/she is denied the benefit if he/she refuses to agree to said request.

The second type of sexual harassment is the hostile environment. It manifests itself when the harasser creates a work environment that is offensive, intimidating, abusive or threatening, and severe enough to alter the conditions of the victim's employment. In addition, it does not require economic damage or proof of psychological damage on the part of the victim. Nor does it have to be an explicitly sexual conduct; it is enough that the harassment or unequal treatment is directed at the person solely because of their sex. This type of harassment occurs even if the manager does not threaten the employee with taking away a specific benefit of the job, if his/her authority is intimidating enough to create real fear in the employee that this might happen. The hostile environment could be generated between co-workers with jokes in bad taste, offenses, obscene and offensive signs, among others.

Sexual harassment at work can be expressed in different ways, be it verbal, physical or by means of telecommunication or tools. The more severe or serious the unwelcome act, the less tolerance may be required for it to constitute sexual harassment. Some examples of unwanted or unwelcome acts are: obscene language of a sexual nature, such as jokes in bad taste, comments, compliments, propositions or insinuations of a sexual nature, among others; obscene or lewd gestures; insistent glances, for example, at the genitals or the breasts, to name a few; obscene drawings, images, objects or materials, including their display or sending electronic transmission; lewd jokes; touching, patting, rubbing, or pinching; invitations to go out; grabbing or squeezing; kisses or caresses; attempts to perform sexual acts or intercourse; exposure of genitals; sex; rape, sexual assault, sexual abuse, or attempts to commit these types of assaults; use of multimedia tools through the network or by any electronic means, such as email, to carry out any type of unwanted sexual conduct; and chasing someone.

To determine whether or not the alleged conduct constitutes sexual harassment at work, all the circumstances surrounding the events will be considered during the investigation process.

Procedure to Submit and Investigate Complaints. The prohibition of acts of sexual harassment applies to all employees of the company regardless of hierarchical level, status or category and to persons not employed by the Company, such as, for example, job candidates, visitors and contractors.

Any employee who is aware of or considers that he or she has been subjected to sexual harassment at work, in any of its forms, must file a complaint following the procedure established herein. The same procedure will apply when the complaint is filed by a job applicant or visitor.

The process of the complaint from its presentation to the final resolution will be conducted diligently and all the participants will avoid unreasonably prolonging the adjudication of the matter. In addition, confidentiality and security must be assured, as much as possible, through effective measures and alternatives that include the protection of victims and witnesses against retaliation and reprisals.

Filing of a Complaint. Employee(s) will file a verbal or written complaint to Employee's manager, the Executive Vice President of Human Resources, and/or the Legal Department. Complaints may be filed anonymously by any means that reasonably allows the manager, the Executive Vice President of Human Resources, and/or Legal Department to become aware of the allegations. All managers must report any complaints of harassment to the Executive Vice President of Human Resources, so the Company may conduct a thorough investigation. Human Resources will immediately advise the complaining party of their rights and the remedies available under the applicable legislation. CrossCountry Mortgage takes all complaints and concerns seriously, which will be handled promptly. If the concern is about a manager, or if it seems more appropriate to the employee, he or she may contact the Executive Vice President of Human Resources. Employees can raise concerns, make reports or participate in an investigation without fear of reprisal or retaliation of any kind. Human Resources will take the necessary measures to carry out the rigorous investigations in these matters. Once the complaint is received or filed, this and all the subsequent procedure until the final decision will be confidential to the greatest extent possible. Job applicants or visitors will file the complaint at HumanResourcesTeam@ccm.com and the same procedure will be followed. The complaint may be verbal first, but then it must be submitted in writing. Anyone found to be engaging in any type of unlawful harassment or retaliation will be subject to disciplinary action, up to and including termination of employment.

Investigation. To the extent possible, the investigation will be carried out, as a general rule, within a period of no more than 10 working days from the filing of the written complaint. To the extent possible, the investigation will cover all the facts denounced and will include the taking of sworn statements from the charging party, the respondent and all the people who know something about the alleged facts or possible witnesses that are identified during the course of the investigation. All statements and any other documents collected will form part of the investigation file. The investigation will be carried out rigorously regardless of whether the harassment has ceased or whether the victim has complied or agreed to the insinuations or invitations of a sexual nature that are the object of the complaint. During the investigation, the victim's history or previous unrelated sexual behavior will not be investigated, nor will this be taken into account for any purpose of the procedure. The employees must cooperate to the fullest extent with the investigation. The investigation will be conducted in the most confidential way possible, protecting the affected parties, except as necessary to investigate. During the course of the proceedings, measures will be taken to protect the victim, the witnesses and the people who collaborate with the investigation. Among them, the victim may be relocated and protective measures against retaliation may be adopted. The participation of witnesses or collaborators will not be documented and recorded in the employee's file. The victim, witnesses or collaborators may file a complaint when decisions about their status, employment conditions are affected or when there is retaliation by the managers or co-workers due to their participation in the investigation. To the extent possible, a written report of the investigation must be issued within 30 business days

from the date the investigation began. The investigator may set a different term, in those cases in which it is duly justified, but it will not be greater than 10 additional working days, to the extent possible.

Investigation of Anonymous Complaints or Rumors. Anonymous complaints that include sufficient allegations to identify a harasser and the facts that could constitute sexual harassment will be investigated. Rumors that are based on “real suspicion”, which refers to repetitive allegations about one or several persons and facts that could give rise to conduct that constitutes sexual harassment, will also be investigated. The investigation will be carried out, as a general rule and to the extent possible, within a period of no more than 10 working days from the filing of the anonymous complaint or knowledge of the rumors. The investigation will begin with a formal interview of all employees who might have knowledge of the facts included in the anonymous complaint or involved in the rumors. In addition, the investigator must interview the possible victim. To the extent possible, the investigation will cover the allegations and will include the taking of written statements from the possible victim, those involved, and from all the people with knowledge about the alleged facts and the possible witnesses identified during the course of the investigation. All statements and any other documents collected will form part of the investigation file. The investigator should provide guidance on the procedure for filing a formal complaint. To the extent possible, the investigator will have 30 days to conclude his investigation. Once the investigation is concluded, a written report detailing the findings and recommendations must be issued. If the investigation reveals that the anonymous complaint or the rumors were unfounded, the report must include a brief explanation of such conclusion. If during the process of investigating the anonymous complaint or the rumors a formal complaint arises, the investigator must consolidate both investigations.

Report, Recommendations and Determinations. Once the investigation is finalized, the investigator will report his/her findings in writing and will issue the corresponding recommendations to the manager. This report will include determinations, based on the information available and the alleged facts, as to whether or not there is sufficient cause to initiate the disciplinary or other applicable procedure according to law. The report will be accompanied by the case file and the communications that, in accordance with the investigator’s recommendations, must be sent to the parties to notify them of the appropriate action. The file will be confidential and may not be examined by the parties or third parties. However, the parties will be informed in writing of the determination issued.

The manager may consult Human Resources to adopt, modify or waive the recommendations made by the investigator, taking into consideration the applicable law, the findings of fact and the nature or seriousness of the alleged conduct that justify it. If there is a reasonable basis for the application of a corrective action or disciplinary sanction, the disciplinary action against the party that has incurred in prohibited conduct at work and of any employee who has acted in violation of the rules governing the matter or failed to comply with their duties and obligations, will proceed in accordance with the provisions of the Employee Handbook. The Company employee who obstructs an investigation related to a complaint of sexual harassment at work will be in violation of the rules of conduct and may be sanctioned in accordance with the corresponding provisions. If it is determined that the acts of potential sexual harassment in the workplace come from third parties not employed by or outside the

Company, the manager will take the corrective measures that are within his/her power and that proceed by law.

Prohibition Against Retaliation. Retaliation of any kind or persecution against persons who use the procedure to file a complaint for conduct of sexual harassment in employment and against witnesses or those who cooperate or collaborate in the process of investigation and adjudication of the complaint is strictly prohibited.

Provisional Measures to Protect Employees. After filing a complaint for sexual harassment at work, whether verbal or written, provisional measures may be taken when these are necessary to provide a respectful work environment or protect the complainant from possible acts of retaliation while the case is investigated, and in order to prevent it from continuing to be exposed to the reported conduct in situations such as the following: (i) when the accused party is the direct manager of the complaining party; (ii) when a hostile environment caused by the manager or by co-workers is alleged; or when an attack has occurred.

As a provisional measure, the parties involved may be removed from the workplace until the investigation is completed. Other provisional measures may be established depending on the facts of each case, such as: (i) the reassignment of the complainant or the alleged harasser to another workplace, if this does not harm the complainant; (ii) suspend the alleged harasser temporarily from employment; (iii) ensuring the complainant is not alone with the alleged harasser; (iv) authorizing time off to any of the parties concerned; and (v) any other provisional measures deemed appropriate and necessary.

The manager or the person who receives the complaint will be responsible for recommending the pertinent provisional measure and duly implementing them, as authorized. Provisional measures should not be considered as a sanction.

Confidentiality. The complaint filed will be processed and investigated in the most confidential manner possible to protect the dignity of the parties involved. Human Resources will keep the files of these cases in separate files from the others and they will be kept confidential.

Any person who intentionally reveals the identity of the parties to unauthorized persons or discloses the information collected or provided in the course of any stage of the processing of a complaint for sexual harassment in employment, will be subject to disciplinary measures in accordance with the Employee Handbook.

Statute of Limitations and Other Legal Remedies. The party affected by the conduct prohibited in this policy may file a complaint for sexual harassment in court within a term of 12 months after the last act occurred. If the affected party is not interested in starting or continuing the procedure established in this policy, they can file a complaint directly on the portal www.hostigamientosexual.pr.gov or a complaint before the Anti-Discrimination Unit of the Puerto Rico Department of Labor and Human Resources, the Equal Employment Opportunity Commission (EEOC), the Office of the Women's Solicitor or a lawsuit in court, without the need to exhaust the administrative remedies established in this Protocol.

In the event that civil liability is found in a lawsuit for sexual harassment filed in court, the employee or applicant for employment may receive a sum equal to twice the amount of the damages that the act has caused; or a minimum of ten thousand dollars (\$10,000) at the discretion of the court, in cases where monetary damages cannot be determined. In addition, the court may order the employer to hire, promote or reinstate the employee, and to cease and desist from the act in question.

Special Leave for Employees in Situations of Abuse. The employee may be entitled to up to 15 days of unpaid leave as detailed above. In addition, the employee may request in writing a reasonable accommodation or flexible working conditions that allow him to deal with the situation of sexual harassment at work or other situations of abuse. Said accommodation will be made by agreement, as permitted by the employee's tasks and responsibilities, which could include moving the employee from the physical place where they perform their duties, modifying the assigned tasks, modifying their entry, exit, lunch or break times, or any other measure that may be established by agreement so that the employee can seek and obtain the help he or she needs to deal with the situation.

Notice. This policy and Law No. 17 will be available on the Company's website and in the area designated for this purpose.

D. SEXUAL ORIENTATION AND GENDER IDENTITY PROTOCOL

Education, Employee Training, and Compliance Protocol for the Prevention of Sexual Orientation and/or Gender Identity Discrimination and Harassment. To ensure and maintain a discrimination and harassment-free workplace for the Company's employees and visitors, and pursuant to the public policy of the government of Puerto Rico, the Company has established this Education, Employee Training, and Compliance Protocol for the Prevention of Sexual Orientation and/or Gender Identity Discrimination and Harassment, which is intended to serve as a guide on: (i) what conduct constitutes discrimination and/or harassment based on sexual orientation and/or gender identity discrimination and harassment; (ii) how to prevent any conduct of this nature; and (iii) how the Company will address instances of this conduct.

The Company values diversity in its workforce and endeavors to provide safe, welcoming, inclusive, and affirming workplace environments for all its employees. The Company appreciates that employees who identify as lesbian, gay, bisexual, transgender, transsexual, two-spirit, intersex, queer or questioning ("LGBTQ") face unique challenges within their communities and workplaces, including being targets of discriminatory behavior. All employees of the Company share the responsibility of supporting LGBTQ employees and assisting the Company in addressing these challenges.

Homophobic and gender-based comments, intimidation, and discrimination are demeaning to all employees regardless of their actual or perceived sexual orientation. The Company will not tolerate any homophobic behavior or bullying, whether by commission or omission. The Company will immediately respond to all reports of conduct of this nature and provide support and assistance to those who are the intended or unintended targets of such behavior.

Definitions

- Bisexual - An individual who is physically and emotionally attracted to both males and females.
- Gay - An individual who is physically and emotionally attracted to someone of the same sex.
- Gender - The expression, behavior, or identification of a person considered as masculine, feminine, androgynous, or any combination thereof. The gender of an individual does not necessarily depend on the sex he/she is assigned at birth or on sexual characteristics. Different cultures and communities may have different conceptions of gender and classify people accordingly.
- Gender Expression - The way a person publicly expresses his/her gender identity through clothing, speech, body language, wearing make-up and/or accessories, and other forms of displaying masculinity or femininity. Gender expression relates to how a person presents his/her sense of gender to society.
- Gender Identity – An individual’s own sense or feeling of being male or female. Gender identity and gender expression are often closely linked to the term “transgender.”
- Gender Non-Conforming - A term for individuals whose gender expression is different from societal expectations related to gender.
- Homophobia - Fear and/or hatred of homosexuality in others, often exhibited by name-calling, bullying, exclusion, prejudice, discrimination, or acts of violence. Anyone who is LGBTQ or assumed to be LGBTQ can be the target of homophobia.
- Intersex – Individuals who are born with or develop primary and secondary sex characteristics that do not fit neatly into society’s definitions of male or female. Intersex individuals do not necessarily identify as transgender. While some people may identify it with the term “hermaphrodite,” intersex is considered a more neutral term.
- Lesbian - A female who is attracted physically and emotionally to other females.
- Queer - Historically, a negative term for homosexuality, but more recently reclaimed by the LGBTQ movement to refer to itself. Increasingly, the word “queer” is popularly used by LGBTQ youth as a positive way to refer to themselves.
- Questioning – An individual who is unsure of his/her sexual orientation or gender identity.

- Straight/Heterosexual - A person who is sexually and emotionally attracted to someone of the “opposite” sex.
- Trans - A term commonly used to refer to transgender and/or transsexual people.
- Transgender - Used most often as an umbrella term encompassing the following individuals: those whose gender identity, behavior, or expression is different from their assigned sex; those whose gender changes at some point in their lives; those who identify as a gender outside the man/woman binary; those who have no gender or multiple genders; those who perform gender or play with it (e.g., in drag contexts).
- Transition - The process of changing one’s gender expression. It may include any combination of coming out; changing one’s dress, appearance, and mannerisms; changing one’s name and/or pronouns; the use of hormones; and/or undergoing surgical interventions. “MTF” refers to a person who transitions from the “male” end of the spectrum towards the “female” end, while “FTM” refers to a person who transitions from the “female” end of the spectrum towards the “male” end.
- Transsexual – Individuals who identify themselves as members of a sex that is different from the sex assigned to them at birth. Many pursue hormones and/or surgical interventions, but not all who seek such medical interventions identify as transsexual.
- Two-Spirit - Certain aboriginal people identify themselves as Two-Spirit rather than as lesbian, gay, bisexual, or transgender. Historically, in many indigenous cultures, two-spirited individuals were respected leaders and medicine people. Two-spirited persons were often accorded special status based upon their unique abilities to understand both male and female perspectives.
- Passing - The act of living and/or being perceived as a specific gender or with a particular sexuality. This is often used to refer to “succeeding” at presenting the gender a person identifies with, but people can pass in other circumstances, sometimes even when they don’t want to. The term “passing” was initially used in the context of people of mixed African-American and white heritage who could pass for white.
- Perceived Sexual Orientation - When someone wrongly assumes that an individual is lesbian, gay, or bisexual without knowing what his/her actual sexual orientation is.
- Sex - The male or female (or intersex) classification that one is assigned at birth, which is based upon one’s anatomy.
- Sexual Identity/Orientation – An individual’s deep-seated feelings of emotional and sexual attraction to another person. This may be with people of the same gender (lesbian or gay), the other gender (heterosexual/straight), or either gender (bisexual).

Compliance Procedure

1. The Company management and employees are responsible for ensuring that all employees practice appropriate behavior and actions to prevent homophobic discrimination and harassment through greater awareness of and responsiveness to their harmful effects.
2. All employees must show respect for LGBTQ employees.
3. The Company will not tolerate language or behavior that degrades or incites hatred, prejudice, discrimination, or harassment towards employees based on their real or perceived sexual orientation or gender identity.
4. All employees are required to exercise individual and collective efforts to identify discriminatory attitudes and behaviors. The Company will work to eliminate systemic inequities and barriers to employees who identify themselves based on sexual orientation or gender identity.
5. All employees must intervene in any interaction involving the use of homophobic epithets and slurs, regardless of the speaker's intentions, and convey that such comments are against the Company's policy and will not be tolerated. Harassment based on sexual orientation or gender identity includes, but is not limited to, asking questions about a co-worker's body, physical changes, or sexual practices; allowing jokes or comments mocking a person's sexual orientation or gender identity, even if not targeted at the victim; using work equipment and materials to produce any tangible matter that undermines a person's dignity because of sexual orientation or gender identity; and/or denying access to sanitary facilities or other gender-identified facilities to employees who identify themselves with that gender identity.
6. Employees must use the Company's dispute resolution procedures to report all incidents of discrimination, harassment, or retaliation based on sexual orientation and/or gender identity.