Compliance Manual

Cranbrook Loans Group, Inc.

NMLS # 1221113

41800 Hayes Road, Clinton Twp., MI 48038

Table of Contents

Company Overview 10
Channel 10
Geographic Footprint 10
Affiliations 11
Company Policies 11
Lending Criteria Policy 11
Inquiries & Applications 12
Application Date 12
Policy with Regards to Loan Approval/Denial 13
Disclosures 13
Customer Service 13
Privacy 14
Restrictions on the Disclosure of Account Information 15
Access to Information 16
Confidential Information 17
Customer Confidential Information 17
Company Confidential Information 17
Diversity - Our Commitment 17
Equal Employment Opportunity and Affirmative Action 18
Hiring Employees/Contractors 19
Overview 19
Limited Participant List Review 19
Employee/Contractor Privacy 20
Employment Records 20
Employee/Contractor Grievances 21
SAFE Act Policy and MLO Licensing 22
Mortgage Loan Originator Duties and Responsibilities 24
Additional Information for MLOs 25
Loan Processors 25
Personal Gain 27
Electronic Signature Policy 27
Overview 27

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All Rights Reserved. Revision July 2026.

Definitions 28
Use of Electronic Signature 29
Compliance Management System 30
Compliance Management System Requirements: 30
Duties and responsibilities of the Compliance Director: 30
Employee Training 31
Risk Assessment 32
Ratings and Audit Frequency: 33
Remediation and Corrective Action 33
Loan Level Compliance 34
Compliance Risk Assessment 34
Complaint Resolution 40
Document Retention 41
Fair Lending Policy 42
Equal Credit & Opportunity Act 45
Overview 45
Notification of Action Taken 46
ECOA Appraisal Valuation 47
Fair Housing Act 47
Overview 47
Procedures 48
Unfair, Deceptive, or Abusive Acts or Practices (UDAAP) 48
Advertising Policy 51
The Fair Housing Act 53
Regulation N 54
Regulation Z 56
Regulation X 59
Social Media 61
Telemarketing Policy 64
CAN-SPAM Act 68
Fair Credit Reporting Act 69
Background 69
Procedures 70
Real Estate Settlement Procedures Act (RESPA) and Reg. X 72

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All Rights Reserved. Revision July 2026.

Overview 72
RESPA Section 8 73
Affiliated Business Relationships 74
Truth-in-Lending Act (TILA) and Reg. Z 74
Overview 74
Appraisal Independence Policy 74
Appraiser Independence Safeguards 75
Appraiser Engagement 76
Subsequent Appraisals 77
Transferring Appraisals 77
Higher-Priced Mortgage Loan (HPML) Appraisal Delivery Policy 78
HPML Overview 78
Safe Harbor 80
Exemptions to the second appraisal property flip policy 81
Unsatisfactory Appraisers 82
Quality Control and Appraisal Review 82
TILA/RESPA Integrated Disclosure Rule (TRID) 82
Pre-Disclosure Activities 82
Loan Estimate (LE) 83
Closing Disclosure (CD) 84
Determination of Closing Costs 84
Rescission 85
Procedure 85
Mortgage Loan Originator Compensation 86
Payments to the Organization 86
Payments to the Individual 87
Additional Compensation Information 87
Anti-Steering Rule 87
Additional Required Disclosures 88
Ability to Repay 89
Overview 89
Exempt Transactions 89
General ATR Requirements 89
General QM Requirements 90

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All Rights Reserved. Revision July 2026.

Procedures 91
Origination 91
Processing 91
Debt to Income Ratios 91
Changed Circumstances 91
USA Patriot Act 92
Overview 92
Procedures 92
Disclosure Timing Requirements 92
ARM Disclosure 92
Borrower's Authorization/Credit Authorization 92
Consumer Handbook on Adjustable-Rate Mortgages ("CHARM") Booklet 92
Credit Score Disclosure or FACT Act Notice to Consumers 93
ECOA Notice 93
E-Sign/E-Consent Disclosure 93
Initial Loan Estimate (LE) 93
List of HUD-Approved Homeownership Counselors 93
Net Tangible Benefit Worksheet 94
Privacy Notice (Regulation P) 94
Risk Based Pricing Notice 94
Uniform Residential Loan Application (URLA) 94
USA Patriot Act Disclosure 95
WHAT YOU SHOULD KNOW ABOUT Home Equity Lines of Credit (HELOC) Booklet 96
Written List of Service Providers 96
Your Home Loan Toolkit 96
Loan Lock Policy 96
Purpose 96
General Responsibilities 96
MLO Responsibilities 97
Lock Confirmations 97
Lock Extensions 97
Switching Investors 97
MLO Compensation 97
Anti-Steering 98

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All Rights Reserved. Revision July 2026.

Anti-Money Laundering Policy 98
Definitions 99
AML Compliance Director Designation and Duties 99
AML Audit - Independent Testing 99
Circumstances for Filing a SAR 100
Sharing of Information/Confidentiality 100
Suspect Notification 100
Other Requests 100
Sharing Information with other Financial Institutions 101
Customer Identification Procedures 101
Information Verification 102
Office of Foreign Assets Control (OFAC) Lists 103
AML Risk Assessment Matrix for Accounts 104
Detecting Red Flags 105
Responding to AML Red Flags and Suspicious Activity 107
Cash Payments Not Accepted 107
Training Programs 108
Loan Fraud Prevention 108
Types of Mortgage Loan Fraud Identified by Law Enforcement 109
Possible Red Flag Indicators of Mortgage Loan Fraud 111
General Red Flags 111
Application Reg Flags 112
Purchase Agreement/Sales Contract Reg Flags 112
Credit Report Red Flags 113
Employment & Income Documentation Red Flags 113
Asset Documentation Red Flags 114
Appraisal Red Flags 115
Title Red Flags 116
Consequences of Loan Fraud 116
Identity Theft Prevention Policy 117
Overview 117
Identified Red Flags 117
Detection of Red Flags 119
Response to Red Flags 119

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All Rights Reserved. Revision July 2026.

Address Discrepancy Policy 119
Requests from Victims of ID Theft 120
Policy Administration 120
Training 121
Service Provider Oversight 121
Policy Review and Updates 121
Reporting 121
Privacy Policy 122
Gramm-Leach Bliley Act (GLBA) 122
Overview 122
Cybersecurity and Information Security 123
Overview 123
Designation of a Qualified Individual 123
Information Security Risks 124
Information Security Systems 125
General Requirements 125
System Access 127
Change Management 128
Asset and Data Inventory 129
Technology Assets 129
Data Inventory 130
Additional Protective Measures 131
Multi-factor Authentication 131
Clean Desk Policy 131
Employee/Contractor Training 132
Testing the System 132
Vulnerability Assessments 132
Continuous Monitoring 133
Penetration Testing 133
Incident Response Plan 133
Duties and Responsibilities 134
Consumer Notification 134
Agency Notifications 135
Business Continuity Plan 135

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All Rights Reserved. Revision July 2026.

Overview 136
Recovery Time for Critical Data 136
Backup and Data Recover Process 136
Alterative Work Locations 136
Pandemic Response Policy 137
Plan Testing and Training 137
Vendor Management Policy 138
Overview 138
Responsibility and Delegation of Duties 138
Procedures 138
Annual Review 140
Branch Oversight Policy 140
Overview 140
Branch Manager Responsibilities 140
Information Security at the Branch 141
Annual Review of the Branch 141
Additional Branch Requirements 141
Remote Work Policy 142
Scope 142
Eligibility requirements 142
Work expectations and schedule 142
Equipment and supplies 142
Technical support 143
Workspace Guidelines 143
Security and confidentiality 143
Annual Compliance Inspection 144
Compensation 144
Consequences 144
Specific Policies Related to Managing Remote Employees 145
Home Mortgage Disclosure Act (HMDA) 145
Overview 145
Regulatory Requirements 146
Resubmission 147
Procedures 147

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All Rights Reserved. Revision July 2026.

Quality Control Plan 149
Overview 149
Objective 150
Pre-Close Reviews 150
Post-Close Reviews 151
Reverifications 153
Additional Scrutinization Required 153
Documenting Pre- and Post-Close Reviews 153
Additional Compliance Reviews 153
Branch or Remote Work Location Audits 154
Quarterly Review of the Loan Origination System 154
Consumer Complaints 154
Staff and Management Training 154
Appendices 156
Exhibit A - Employee/Contractor Suspicious Activity Notification 157
Exhibit B - Employee/Contractor Confidentiality Pledge 160
Exhibit C - Employee Compliance Manual Certification 162

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All Rights Reserved. Revision July 2026.

Company Overview

Cranbrook Loans Group, Inc. is a mortgage broker and non-delegated correspondent and as such, operates as the professional intermediary who brokers mortgage loans between the consumer and the wholesale lender on some loans and operates as a non-delegated correspondent lender on others. We, therefore, do not make credit decisions but rather rely on the expertise of our wholesale lenders.

Cranbrook Loans Group, Inc. seeks to help its clients find the best home financing for their given scenario.

Cranbrook Loans Group, Inc.'s mission is to help its clients reach their home financial goals by providing holistic advice based on each client's scenario, founded on the principles of efficiency, availability, creativity, and effectiveness.

Cranbrook Loans Group, Inc. will utilize senior management for executive decision making. Senior management is defined as individuals at the highest level of management.

At this time, Cranbrook Loans Group, Inc.'s senior management is comprised of the following individuals:
Michael Davis

The Compliance Director is Michael Ayoub.
The AML Director is Michael Ayoub.
The Information Security Director is Michael Ayoub
The SAFE Act Director is Michael Ayoub

Channel

Cranbrook Loans Group, Inc. operates as a mortgage broker and non-delegated correspondent.

Geographic Footprint

The current geographical footprint includes the State(s) of Michigan, Ohio, Pennsylvania, Florida, Georgia. Licensed MLOs may only originate mortgage loans on properties within the state(s) where Cranbrook Loans Group, Inc. and MLO hold a valid license, as required by law.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Affiliations

§ 2602

As defined in section 3(7) of RESPA (12 U.S.C. 2602(7)), an Affiliated Business Arrangement means an arrangement in which:

(A) a person who is in a position to refer business incident to or a part of a real estate settlement service involving a federally related mortgage loan, or an associate of such person, has either an affiliate relationship with or a direct or beneficial ownership interest of more than 1 percent in a provider of settlement services; and

(B) either of such persons directly or indirectly refers such business to that provider or affirmatively influences the selection of that provider

Cranbrook Loans Group, Inc. has an affiliated business arrangement with the following business:

An affiliate as set forth in the Bank Holding Company Act of 1956 is any company that controls, is controlled by, or is under common control with another company.

Company Policies

Cranbrook Loans Group, Inc. adopts the following policies.

Lending Criteria Policy

Cranbrook Loans Group, Inc. does not make credit decisions but relies on the expertise of a wholesale lender who is required to adhere to all agency guidelines, with some specific variances.

The maximum loan amount for mortgage loans will be determined by Fannie Mae, Freddie Mac, FHA, VA, USDA, wholesale lender, and secondary market requirements.

No employee/contractor of Cranbrook Loans Group, Inc. will, in any manner, discourage a consumer from applying for credit. Cranbrook Loans Group, Inc. will accept and consider any application from a consumer who wishes to submit a request for credit. Such a request must be made in writing or by electronic means.

Mortgage Loan Originators and processors are prohibited from making credit decisions or giving the consumer the impression that a loan has been approved and/or denied.

No credit will be extended to any person who does not comply with all Verification of Identification requirements of section 326 of the USA Patriot Act.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

No credit will be extended to any person on the U. S. Department of Treasury Office of Foreign Assets Control (OFAC) Sanction Lists.

All credit decisions will be made by the lender underwriting and purchasing the mortgage loan (as applicable). The Equal Credit Opportunity Act (ECOA), the Fair Housing Act (FHA), the Ability to Repay, and the Qualified Mortgage Standards will be strictly adhered to.

Inquiries & Applications

Cranbrook Loans Group, Inc. employees/contractors are encouraged to provide information about loan products to potential customers, but he/she must not offer an opinion as to whether someone is likely to receive loan approval on a loan request. If an opinion is given, either verbally or in writing, under ECOA, an application has been made and full disclosure is required.

Cranbrook Loans Group, Inc. employees/contractors can provide basic information on types of loan products, but they must be careful not to decide based upon the inquiry. Instead, employees/contractors should encourage the individual to make a written application. We will allow any interested inquirer to apply. Any MLO that receives an oral application must document it in writing within our LOS.

Application Date

Cranbrook Loans Group, Inc. has generally adopted the Truth in Lending Integrated Disclosure Rule definition of an application. Specifically, "An application means the submission of a consumer's financial information for the purposes of obtaining an extension of credit. For transactions subject to §1026.19 (e), (f), or (g), an application consists of the submission of the following six pieces of information:

- The full name
- The property address.
- The consumer's income.
- The consumer's social security number to obtain a credit report.
- An estimate of the value of the property.
- The mortgage loan amount sought.

This definition of an application has been adopted into Cranbrook Loans Group, Inc. procedures for any type of closed end credit requested and thus when the information above has been received, Cranbrook Loans Group, Inc. has received a Completed Application.

When Cranbrook Loans Group, Inc. receives the above information, the transaction will be considered an application, and all disclosure requirements will be triggered. It is important to note that all applications are required to include the MLO's name and

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

NMLS number, plus the company's name and NMLS number. In addition, the MLO should sign and date the document at the time the application is received.

Policy with Regards to Loan Approval/Denial

Cranbrook Loans Group, Inc. will operate in the capacity of a licensed mortgage broker and non-delegated correspondent lender.

In the event a file is denied by the investor, they will issue the Adverse Action Notice to the consumer. Loans that have had no activity or communication with the borrower will be considered withdrawn and no further consideration will be given to the request.

Disclosures

Cranbrook Loans Group, Inc. operates as a mortgage broker and non-delegated correspondent and as such, disclosures are generally issued by the creditor. Loan origination staff are trained in the timing requirements of all applicable rules and regulations and must work with the creditor to ensure all disclosure timing requirements are met. Cranbrook Loans Group, Inc. understands that they are ultimately responsible for ensuring that all federal and state disclosures have been provided to the consumer as required.

Customer Service

Cranbrook Loans Group, Inc. has a continuing commitment to provide our customers and our fellow employees/contractors with the highest quality customer service. Our view of customer service encompasses competence, courtesy, and respect. Additionally, Cranbrook Loans Group, Inc. values efficiency, availability, creativity, and effectiveness. This is demonstrated by exceeding expectations, anticipating needs, and approaching daily activities in a responsible and ethical manner.

When serving a customer, all employees/contractors are required to represent Cranbrook Loans Group, Inc. in the most favorable light. Our customers form impressions based on how they are served by our employees/contractors, so attitude, availability and behavior are of utmost importance.

It is extremely important that each customer is provided with exceptional service, therefore employees/contractors are expected to:

- Smile, make eye contact, and use a friendly tone of voice in person and on the phone.
- Greet customers and address them by name.
- Offer to help. Take the initiative by asking how you may meet their needs.
- Create a lasting impression. Thank customers for their business and invite them back.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- When serving customers by telephone, employees/contractors should always observe proper telephone etiquette.
- Answering calls promptly, identifying themselves, and speaking clearly.
- Information should be requested tactfully, and employees/contractors should provide undivided attention to the caller.
- Communications should be responded to within 24 business hours or earlier using the same communication channel or the best channel available.
- Co-workers are customers, too, and deserve the same respectful and courteous treatment as our external customers.

Privacy

Specific privacy requirements are also addressed under the Gramm-Leach-Bliley Act section of this manual.

The policy of Cranbrook Loans Group, Inc. is that the financial records of our customers and the relationships between Cranbrook Loans Group, Inc. and our customers are confidential, and that the safekeeping of customer information is a priority.
We collect, retain, and use information about our customers when we reasonably believe that it will help administer our business or provide products, services, and other opportunities for them. We collect and retain information about our customers only for specific business purposes - unless prohibited by law from doing so. We use information to comply with certain laws and regulations, help us design or improve our products and services, and to understand our customers' financial needs so that we can provide our customers with quality products and superior service. Privacy Notices are provided as required by applicable state and federal laws.

The purpose of our Privacy Policy is to define specific principles for Cranbrook Loans Group, Inc. employees/contractors to follow in compliance with customers' rights and existing laws as it pertains to personal non-public information.

- No employee/contractor other than Cranbrook Loans Group, Inc.'s designated representative(s) is authorized to divulge financial information or records of a customer to anyone outside Cranbrook Loans Group, Inc..
- It is the policy of Cranbrook Loans Group, Inc. to cooperate with governmental agencies in their properly made, legitimate requests for information and only in compliance with the specific requirements of the Right to Financial Privacy Act.
- It is the responsibility of each department manager to ensure that Cranbrook Loans Group, Inc. employees/contractors in their area understand the importance of confidentiality and customer privacy and receive training in responding to requests for information appropriate for the types of requests that may be received by that area.

All employees/contractors must adhere to the following privacy rules:

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Give customers and consumers the right to opt out of certain types of information-sharing of their data by Cranbrook Loans Group, Inc. or by third parties who are not affiliates.
- Prohibit sharing certain types of information about our customers and consumers, unless their consent if provided and conditions are met, or in the case of legal or judicial requirement.
- Provide an initial Privacy Notice to our customers. Cranbrook Loans Group, Inc. operates as a mortgage broker and non-delegated correspondent, and the wholesale lender will provide initial disclosures in most instances. We are aware that we, as the originating source, are ultimately responsible for ensuring that our customer is provided a Privacy Disclosure detailing what, and to whom, we provide non-public information to. If the wholesale lender does not provide a Privacy Policy with our information completed, we will deliver one of our own.
- Safeguard the confidentiality and security of customer data and any nonpublic personal information.

Non-public Personal Information generally includes any information that is not publicly available that a consumer provides to obtain a product or service.

Personal information includes, but is not limited to:

- Individual names
- Social Security Numbers
- Credit or debit card numbers
- State identification card numbers
- Driver's license numbers
- Asset information
- Credit/liability information
- Income information

Personal information does **not** include publicly available information that is lawfully made available to the public from federal, state, or local government records.

Violation of this confidence is cause for disciplinary action up to and including termination of employment.

Restrictions on the Disclosure of Account Information

Cranbrook Loans Group, Inc. will not reveal confidential customer information to third parties except in the following instances:

- The information is provided to any affiliate of Cranbrook Loans Group, Inc. that may now exist or hereafter be established.
- As necessary to effect, administer, or enforce a transaction requested or authorized by the consumer.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- To service or process a financial product or service requested or authorized by the consumer.
- To protect the confidentiality or security of our customers' records pertaining to the consumer, service, product, or transaction.
- To protect against or prevent actual or potential fraud, unauthorized transactions, claims or other liability.
- For required institutional risk control or for resolving consumer disputes or inquiries.
- To persons holding a legal or beneficial interest relating to the consumer or to persons acting in a fiduciary or representative capacity on behalf of the consumer.
- To provide information to insurance rate advisory organizations, guaranty funds or agencies, agencies that are rating our customers, people that are assessing our customers' compliance with industry standards.
- To the extent specifically permitted or required under other provisions of law and in accordance with the Right to Financial Privacy Act of 1978 (to law enforcement agencies -including government regulators).
- To a consumer reporting agency in accordance with the Fair Credit Reporting Act.
- In connection with a proposed or actual sale, merger, transfer, or exchange of all or a portion of a business or operating unit if the disclosure of nonpublic personal information concerns solely consumers of such business or unit.
- To comply with Federal, State, or local laws, rules, and other applicable legal requirements.
- To comply with a properly authorized civil, criminal, or regulatory investigation, or subpoena or summons by Federal, State, or local authorities; or
- To respond to judicial process or government regulatory authorities having jurisdiction over our customers for examination, compliance or other purposes as authorized by law.
- We do not provide account or personal information to unaffiliated third parties for the purpose of independent telemarketing or direct mail marketing of any non-financial products or services of those companies.

Access to Information

Cranbrook Loans Group, Inc. will maintain appropriate security standards and procedures regarding unauthorized access to customer information (additional details are in our Cybersecurity/Information Security Policy). Employee/contractor's access to

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

personally identifiable information will be limited to those with a business reason for knowing such information. If personally identifiable customer information is provided to a third party, Cranbrook Loans Group, Inc. will share information only as necessary to provide products and services to our customers, and only to third parties who adhere to similar privacy principles that provide for keeping such information confidential.

Confidential Information

Customer Confidential Information

Cranbrook Loans Group, Inc. employees/contractors are entrusted with information regarding our customers' personal financial affairs. This information is strictly confidential, as is every transaction between Cranbrook Loans Group, Inc. and our customers. Company records, communications, and proprietary information must also be treated in a confidential manner.

Company Confidential Information

Confidential information must not be discussed or disclosed beyond the necessary requirements of Cranbrook Loans Group, Inc.'s employees/contractors' job. It is paramount that we protect every aspect of our business from access by unauthorized persons. Confidential information includes information about Cranbrook Loans Group, Inc. including without limitation:

- Financial and other operating data except as published or released by Cranbrook Loans Group, Inc..
- Marketing strategy.
- Names of actual or potential customers or suppliers and transactions with them.
- Any information on Cranbrook Loans Group, Inc. Intranet.
- Plans for future conduct of all phases of Cranbrook Loans Group, Inc. business.
- Any information relating to Cranbrook Loans Group, Inc. employees/contractors.

Confidential information also includes information about Cranbrook Loans Group, Inc.'s intellectual property, including unpublished inventions and trade secrets, including but not limited to, the following areas:

- Process and operation procedures.
- Research and development plans and results.
- Formula, properties, and designs of Cranbrook Loans Group, Inc. products.
- Software in various stages of development.

Diversity - Our Commitment

At Cranbrook Loans Group, Inc. diversity is an essential component of the way we do business. We know that valuing diversity makes good business sense and helps to ensure our future success. We believe building understanding, respect, and

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

appreciation for diversity contributes to the growth of our associates. We hold one another accountable for this commitment.

We demonstrate this commitment in the following ways:

For Our Associates

- We recruit and hire a diverse workforce to reflect the communities we serve.
- We leverage the unique capabilities and perspectives of individuals.
- We respect our team members by listening and responding to their diverse needs.

For Our Customers

- We welcome all guests.
- We respect our guests by listening and responding to their diverse needs.

For Our Business

- We retain loan products and services that reflect the diverse needs of the marketplace.
- We know that diverse teams produce better solutions and give us an innovative advantage.

Equal Employment Opportunity and Affirmative Action

Cranbrook Loans Group, Inc. is committed to respecting diversity and to providing a workplace that assures equal opportunity for all employees/contractors and is free of employment discrimination. It is the policy of Cranbrook Loans Group, Inc. to comply with all federal and state laws and regulations regarding employment.

Employment decisions, such as hiring, promotion, demotion, transfer, recruitment, separation, layoff, termination, salaries, benefits, or other forms of compensation will be made based on individual merit, skill, qualification, and without regard to race, color, age, national origin, religion, disability, veteran status, marital status, sexual orientation, gender, and other protected categories as defined by law. In making employment decisions, we may consider both objective and subjective factors, such as education, training, demonstrated skills, prior job experience, prior job performance, attitude, ability to work with others, leadership, and potential for growth in the job.

Cranbrook Loans Group, Inc. may develop, maintain, and enforce affirmative action plans tailored to our geographic areas and/or business functions to ensure opportunities for women, minorities, veterans, and the disabled.

Supervisors are responsible for understanding, communicating, implementing, and maintaining Cranbrook Loans Group, Inc.'s Equal Employment Opportunity and

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Affirmative Action procedures and for creating a work environment that promotes fairness and diversity.

Hiring Employees/Contractors

Overview

Cranbrook Loans Group, Inc. is committed to respecting diversity and to providing a workplace that assures equal opportunity for all employees/contractors and is free of employment discrimination. It is the policy of Cranbrook Loans Group, Inc. to comply with all federal and state laws and regulations regarding employment. Employment decisions, such as hiring, promotion, demotion, transfer, recruitment, separation, layoff, termination, salaries, benefits, or other forms of compensation will be made based on individual merit, skill, qualification, and without regard to race, color, age, national origin, religion, disability, veteran status, marital status, sexual orientation, gender, and other protected categories, as defined by law. In making employment decisions, we may consider both objective and subjective factors, such as education, training, demonstrated skills, prior job experience, prior job performance, attitude, ability to work with others, leadership, and potential for growth in the job.

Offers of employment/engagement may only be extended by Senior Management of Cranbrook Loans Group, Inc. and are contingent upon successfully passing verification of previous employment history, educational credentials, and criminal record checks. All employees/contractors must complete an Employment/Engagement Package in its entirety and forward all documentation to the Human Resource Department or Senior Management.

Cranbrook Loans Group, Inc. will follow its SAFE Act Policy when hiring mortgage loan originators (MLOs). All employees/contractors will undergo a thorough background review before being hired. This background review may include confirmation and verification of education, employment history, and criminal history, if any. Cranbrook Loans Group, Inc. may also rely on information as obtained by NMLS or state regulator. Any material omission of information or misrepresentation of information may disqualify the individual for employment with Cranbrook Loans Group, Inc..

Limited Participant List Review

To help ensure loans we originate are saleable, all potential new hires are checked against the following lists to ensure they are eligible to transact mortgage business:

- FHA's System for Award Management (SAM) www.sam.gov/search
- HUD's Limited Denial of Participation (LDP) https://www.hud.gov/program_offices/general_counsel/limited_denial_participation_hud_funding_disqualifications

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- US Department of Treasury, Office of Foreign Assets Control (OFAC) https://sanctionssearch.ofac.treas.gov/
- FhFA's Suspended Counterparty Program https://www.fhfa.gov/regulation/suspended-counterparty-program

In addition, the lender will complete the required checks with these lists on a per loan basis during the underwriting process.

Employee/Contractor Privacy

Cranbrook Loans Group, Inc. respects the rights and dignity of everyone. To protect the individual's right to privacy, the following policies are adopted:

- Personal information about our employees/contractors will be gathered on a business need to know basis only
- Cranbrook Loans Group, Inc. will protect the confidentiality of all personal information in our records and files and limit access to said information
- Each employee/contractor has the right of reasonable access to his/her personal information contained in the company's records and the right to correct inaccurate information and/or express disagreement with the information
- Cranbrook Loans Group, Inc. will refuse, except in limited circumstances, to release information to an outside source without the employee's written permission. Exceptions are limited to employment verifications and legal requirements.

Cranbrook Loans Group, Inc. requires every employee/contractor to respect the privacy of other employees and adhere to this policy. Accessing or disseminating private information can result in disciplinary action, up to and including termination.

Employment Records

The personnel file of Cranbrook Loans Group, Inc.'s current and former employees, will be maintained by senior management or the Human Resources Department. This information is confidential and should not be accessible to staff. If the individual is licensed, the information in the personnel file should be consistent with the information in the NMLS.

A personnel file contains an employee's/contractor's employment/engagement application information, including application forms, background checks, reference checklists, written performance appraisals, letters of recommendation, or other recognitions of excellent performance, notices of suspension, disciplinary action or termination, necessary payroll documents, including tax withholding forms and salary change notices, salary and work history, including status change forms, benefit enrollment forms, as well as other information. Employees/contractors are responsible for advising senior management about any change in name, marital or dependent

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

status, address, insurance, tax exemptions or other information maintained in the personnel file.

Employee/Contractor Grievances

Cranbrook Loans Group, Inc. will provide a fair, equitable, and productive work environment for all employees/contractors. Open communication and feedback are regarded as essential elements of a satisfying and productive work environment. Cranbrook Loans Group, Inc. encourages its employees/contractors to resolve any issues or concerns that they may have at the earliest opportunity with each other, or their immediate supervisor. This policy supports our work environment by providing a transparent and consistent process for resolving grievances and work-related complaints as they arise.

Employees/Contractors should feel comfortable discussing issues with their manager or supervisor. Complainants will not suffer any disadvantage, victimization, or discrimination because of raising a grievance. The preferred process involves employees/contractors resolving issues to their satisfaction internally, without the feeling they must refer to external organizations or to authorities for assistance. No employee/contractor will be intimidated or unfairly treated in any respect if they utilize this process to resolve an issue. Everyone has a responsibility to comply with this policy and treat others with dignity and respect.

Cranbrook Loans Group, Inc. uses a four-level grievance procedure.

Level 1

The employee/contractor attempts to resolve the complaint as close to the source as possible, generally by discussing the issue with the person involved. This level is quite informal and verbal. Should the employee/contractor not feel confident in discussing the matter, they should proceed immediately to Level 2.

If the matter is not resolved, proceed to Level 2.

Level 2

The employee/contractor notifies their manager (in writing or otherwise) as to the substance of the grievance and states the outcome sought. Discussion should be held between the employee/contractor and any other relevant party. This level will usually be informal but either party may request written statements and agreements.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Should the person who is the subject of the complaint be the employee's manager, the employee/contractor should notify another manager, or another member of Cranbrook Loans Group, Inc. at an appropriate level. This level should not exceed one week.

If the matter is not resolved, proceed to Level 3.

Level 3

The manager must refer the matter to the business manager or owner. A grievance taken to this level must be in writing from the employee. The manager will forward any additional information thought relevant. The business manager or owner will provide a written response to the employee. The business manager or owner also communicates with any other parties involved or deemed relevant. This level should not exceed one week.

If the matter is not resolved, proceed to Level 4.

Level 4

The employee/contractor will be advised of his/her rights to pursue the matter with external authorities if they so wish.

SAFE Act Policy and MLO Licensing

A Mortgage Loan Originator, or MLO, is defined as any person who either receives compensation for, or represents to the public, that they will take a residential mortgage loan application, assist a consumer in obtaining a loan, or offer or negotiate rates and/or terms of a residential mortgage loan. Cranbrook Loans Group, Inc. requires all MLOs to follow the licensing requirements of the states in which the company does business. The Secure and Fair Enforcement for Mortgage Licensing Act of 2008 (SAFE Act) was enacted, requiring all states to create a law overseeing the licensing and regulation of mortgage loan officers. Each state's law was required to be at least as strict as the SAFE Act.

The Act also established the Nationwide Multistate Licensing System/Nationwide Mortgage Licensing System and Registry (NMLS), which serves as repository for all MLO licensing information across the United States. Therefore, Cranbrook Loans Group, Inc. has adopted this board SAFE Act Policy to address general licensing requirements of MLOs in the various states where we conduct business. Michael Ayoub, has been appointed as the company's SAFE Act Director, who will oversee this policy. It is the responsibility of the SAFE Act Director to ensure that all mortgage loan applications taken at Cranbrook Loans Group, Inc. will be originated by a properly licensed and sponsored MLO.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

The following requirements must be met prior to an MLO license being issued:

- Complete a minimum of twenty (20) hours of NMLS approved pre-licensing education. Some state agencies may require more than the designated twenty (20) hours or require a certain number of hours with state content. Once licensed, MLOs must complete eight (8) hours of continuing education classes each year, before the license can be renewed. Some states may require state-specific content or dictate other content requirements.
- Pass the National SAFE MLO National Test with Uniform State Test Content; this test, if passed once, satisfies all state testing requirements, subject to expiration rules.
- Submit fingerprints to facilitate the background check process.
    - MLO will provide SAFE Act Director with authorization to obtain information related to sanctions or findings in any administrative, civil, or criminal action to which the employee/contractor is a party, made by any governmental jurisdiction.
    - MLO will attest to the correctness of all required information submitted on behalf of the employee/contractor by our company.
    - MLO will renew the license during the annual renewal period.
    - MLO will confirm that the information originally sent remains accurate, or will work with the SAFE Act Director to update the information, as required by law.
- Have their credit report pulled through the NMLS and address any derogatory items with the state in which they are seeking a license.
- Be sponsored by a licensed broker, lender, or servicer company
- Obtain a surety bond, if required by state law.

The individual seeking a license, or renewal, will provide the SAFE Act Director with information necessary to complete their NMLS profile, including their current name and any other names used, home address and contact information, social security number, gender, date and place of birth, employment history for the ten (10) years prior to the date of registration or renewal, convictions of any criminal offense involving dishonesty, breach of trust, or money laundering against the individual, any civil judicial actions against the individual in connection with financial services-related activities, actions or orders by state or federal regulatory agencies or foreign financial regulatory authorities that found the individual to have made a false statement or omission or been dishonest, unfair or unethical; to have been involved in a violation of a financial services related regulation or statute; or to have been a cause of a financial services-related business having its authorization to business denied, suspended, revoked, or restricted.

For those individuals that already have an existing record with the NMLS, the SAFE Act Director will review the individual's NMLS record and confirm their employment history has been updated to reflect employment at Cranbrook Loans Group, Inc., and that all other information is correct. If necessary, the individual will update the record by filing a new MU4 form. Once the individual's NMLS record is up to date, the SAFE Act Director

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

will request sponsorship. An MLO is prohibited from originating mortgage loans for Cranbrook Loans Group, Inc. until the sponsorship is approved and the MLO's license status is active, unless temporary authority has been granted.

The SAFE Act Director will register Cranbrook Loans Group, Inc. and all required employees/contractors with the NMLS according to the procedures established. The SAFE Act Director will make certain that all required employees/contractors have met all licensing requirements, including background checks, fingerprinting, bonding, education, and examination. The SAFE Act Director will also be responsible for the updating and maintenance of the company record in the NMLS and assisting MLOs in keeping their records up to date. Some of these duties include, but are not limited to the following:

- Submit MLO fingerprints when required for a background check
- Maintain record of all sponsored MLO's NMLS identification numbers
- Train MLOs on their responsibilities under the various state laws
- Update company record in a timely manner when MLOs are hired or terminated, or other information becomes outdated, including immediately terminating the relationship in the system which will automatically terminate access and end the active sponsorship
- Submit quarterly Mortgage Call Reports (MCRs) prior to the due date, that contain accurate loan data.
- Submit annual and/or quarterly financial condition reports

While the SAFE Act Director may outsource the filing of information with the NMLS, including its MCRs and financial condition reports, the SAFE Act Director acknowledges that any late filings can result in fines to the company and the inability to renew the licenses of the company and/or MLOs. To mitigate this risk, the SAFE Act Director has established a process of early submission of data to any third-party engaged to assist with Cranbrook Loans Group, Inc.'s required filings.

Mortgage Loan Originator Duties and Responsibilities

MLOs play a critical role in the success of Cranbrook Loans Group, Inc., this includes the company's financial and compliance success. MLOs are the face of the company and have the most interactions with consumers. It is important they portray an image that promotes Cranbrook Loans Group, Inc. in a positive way. Treating all consumers fairly and originating loans in compliance with state and federal law is the foundation for all MLO activity. MLO duties and responsibilities include the following items:

- Maintain knowledge and counsel consumers on loan programs, products, and interest rates available
- Prequalify consumers based upon income, assets, and debt to help them determine how much they can afford to borrow
- Obtain information from the applicant to complete the application in the loan origination system

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Submit applications to a lender within 24 hours of receiving the completed application
- Collect documentation from the consumer necessary for underwriting the loan and assist in obtaining any additional information that may be necessary to close the loan
- Maintain a high level of customer service when communicating with applicants, account representatives, third-party service providers, and other staff members
- Actively manage a pipeline of loans from application through closing, keeping consumers and others updated throughout the process
- Attend and participate in training sessions and meetings as required by management
- Maintain knowledge of, and adhere to Cranbrook Loans Group, Inc.'s policies and procedures, as well as state and federal law that governs the activity of Cranbrook Loans Group, Inc. and its employees/contractors

Additional Information for MLOs

An MLO's workstation may be the corporate office location, a branch office, or remote. The SAFE Act Director or Senior Management will approve the worksite of the MLO and retain record in their human resources file. Each MLO is responsible for originating their own sales by contacting prospective clients and developing and maintain referral sources of business. MLOs will contact real estate agents, financial advisors, and other potential referral sources to develop borrower leads. MLOs may engage in marketing and promotional activities to support their own sales, at their own expense; however, all marketing and promotional activities must follow the advertising policy, which requires MLOs fully comply with the provisions in Regulation X, relating to referral fees, kickbacks, and unearned fees. Cranbrook Loans Group, Inc. will not tolerate MLOs paying for, or providing things of value, for referrals or in anticipation of the referral of future business.

Cranbrook Loans Group, Inc. will seek Temporary Authority to Operate (TAO) for the MLO when and where available. If an MLO speaks with a consumer seeking to finance a property in a state where the MLO is not licensed, and the MLO transferred the consumer to another in-house MLO, the transferring MLO may be compensated as spelled out is his/her compensation agreement. However, if the consumer is transferred or referred to an outside MLO, the transferring or referring MLO is not entitled to compensation or a referral fee. Cranbrook Loans Group, Inc. will not allow unlicensed MLOs to originate loans under its license(s).

Loan Processors

In addition to MLOs, Mortgage Loan Processors, are key to the success of Cranbrook Loans Group, Inc.. Mortgage Loan Processors provide professional and personalized service to our customers by being knowledgeable about the mortgage loan process, its

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

rules and regulations, and courteous and respectful in all interactions. Quality service is a requirement, regardless of whether the processor is an in-house processor or third-party contract processor. In-house processors will be W2'd employees of Cranbrook Loans Group, Inc.. If any third-party processors are used, a review of the NMLS will be completed by the SAFE Act Director prior to engagement to ensure the company and its processors are correctly set up and licensed for the state(s) in which we are going to use their services.

Processors are often detail orientated individuals who can multi-task in a high pressure, quick paced environment. The primary function of a Mortgage Loan Processor is to ensure the timely and accurate packaging of all loans originated by our MLOs for submission to a lender for underwriting, approval, and funding. Mortgage Loan Processor responsibilities include the following items:

- Receive signed loan documents and verify all information is correct
- Generate the Loan Estimate (LE), as Cranbrook Loans Group, Inc. policy dictates, and provide the LE to the applicant within three business days of receiving the completed application
- Review all information contained in the application and credit report with the borrower to ensure it is correct
- Verify all information on the application is supported by the borrower's documentation, as required by the loan program
- Verify all loan documents including income, credit, appraisal, mortgage insurance (if applicable), and title insurance are correct, complete and in the loan file
- Ensure all loan documentation is complete, accurate, and complies with Cranbrook Loans Group, Inc. policy
- Review underwriting conditions to ensure all items are received and back to the lender timely
- Communicate with the applicant throughout the loan process, up to and including funding and disbursement of the loan proceeds
- Order documents, such as appraisal, title, etc. and coordinate due dates to meet crucial deadlines to keep advancing the loan towards closing
- Request additional supporting documentation from the borrower, as necessary
- Prepare verification documents and send them to the appropriate party for completion
- Receive and review supporting documentation to ensure accuracy and completeness
- Calculate private mortgage insurance premiums, prorated taxes, and insurance rates for escrow account establishment
- Prepare final loan file for underwriting with updated and accurate information
- Contact the borrower with the lender's decision and schedule a closing
- Maintain good relationships with customers, venders, and referral sources
- Request the necessary closing documents are prepared, and schedule a closing
- Submit closing documents and instructions to the settlement agent

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Mortgage Loan Processors are prohibited from discussing products, programs, or interest rates with a loan applicant, unless they are licensed in the subject property state. All questions concerning the job functions should be directed to Senior Management.

Personal Gain

Employees/contractors of Cranbrook Loans Group, Inc. may not use their employment directly or indirectly for private gain, advancement of personal interest or to obtain benefits for themselves, their customers, or suppliers. Employees/contractors must avoid dealing, on behalf of Cranbrook Loans Group, Inc., with any person or firm with whom they have any financial interest.

Buying, selling, making loans or commitments, acceptance of any business or employment activity at any time that would conflict with Cranbrook Loans Group, Inc. interests or diminish one's ability to render full, loyal, and undivided service to the corporation is prohibited.

Electronic Signature Policy

Overview

The Uniform Electronic Transactions Act (UETA) and the Electronic Signatures in Global and National Commerce Act (E-Sign) provide the regulatory framework for the use of electronic signatures. These Acts provide the same legal effect for electronic signatures as traditional paper and ink ("wet") signatures provided that:

- The consumer must consent to the use of electronic signatures and not have withdrawn that consent.
- This consent must reasonably demonstrate that the consumer can access the information being provided electronically.

Prior to their consent, the consumer must be provided a disclosure which specifies:

- Any right or option of the consumer to have the record provided or made available on paper or in non-electronic form 15 U.S.C. 7001(c)(i)
- The right to withdrawn consent, how to withdraw consent and how to update information 15 U.S.C. 7001(c)(i) and (iii)
- Whether the consent applies to the specific transaction, or identify categories of records that may be provided 15 U.S.C. 7001(c)(ii)
- How the consumer may, after consent, request a paper copy of an electronic record and whether any fee will be charged.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- The hardware and software requirements for access and retention of electronic records

After consent, if a change in hardware or software requirements needed to access or retain electronic records creates a material risk that the consumer will not be able to access or retain a subsequent electronic record that was the subject of the consent, the provider must provide the consumer with a statement of the revised hardware and software requirements for access to and retention, and the right to withdraw consent without the imposition of any fees and without the imposition of any condition or consequence that was not previously disclosed. 15 U.S.C. 7001(D)(i)

In order to qualify as an electronic signature under the E-Sign Act and UETA, the system used to capture the transaction must keep an associated record that reflects the process by which the signature was created.

Electronic records are subject to all state and federal record retention requirements.

Definitions

- Approval authority - for purposes of this guideline, will mean the senior management of Cranbrook Loans Group, Inc. or designee. An electronic signature created through the use of Public Key Infrastructure (PKI) or any method that permanently encrypts a record must be approved by senior management of Cranbrook Loans Group, Inc..
- Approved electronic signature method - is one that has been approved in accordance with this guideline and applicable state and federal laws, and which specifies the form of the electronic signature, the systems and procedures used with the electronic signature, and the significance of the use of the electronic signature.
- Certificate - is an electronic document used to identify an individual, server, a company, or some other entity, and to associate that identity with a public key. A certificate provides generally recognized proof of an entity's identity.
- Electronic - relates to technology having electrical, digital, magnetic, wireless, optical, electromagnetic, or similar capabilities.
- Electronic signature - is defined as an electronic sound, symbol, or process, attached to, or logically associated with a record and executed or adopted by a person with the intent to sign the record. An electronic signature must be attributable (or traceable) to a person who has the intent to sign the record with the use of adequate security and authentication measures that are contained in the method of capturing the electronic transaction (e.g., use of personal identification number or personal log-in identification username and password),

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

and the recipient of the transaction must be able to permanently retain an electronic record of the transaction at the time of receipt.

- Electronic record - is defined as any record created, used, or stored in a medium other than paper, such as: information processing systems, computer equipment and programs, electronic data interchange, electronic mail, and similar technologies. To the extent that facsimile, telex, and/or tele-copying, and/or former hard copy documents are retained in electronic form, through a scanning process, they are also considered electronic records.
- Electronic transaction - is a transaction conducted or performed, in whole or in part, by electronic means or electronic records.
- Public-key infrastructure (PKI) - is a form of information encryption that uses certificates to prevent individuals from impersonating those who are authorized to electronically sign an electronic document.
- Public key - is a value provided by some designated authority as a key that, combined with a "private key" derived from the public key, can be used to effectively encrypt messages and digital signatures.
- Private key - is an encryption/decryption key known only to the party or parties that exchange messages. In traditional private key cryptography, a key is shared by the parties so that each can encrypt and decrypt messages.
- Record - is information that is inscribed in a tangible medium or that is stored in an electronic or other medium and is retrievable in perceivable form. Financial and other documents or forms are records.

Use of Electronic Signature

Cranbrook Loans Group, Inc. allows the use of electronic signatures as an acceptable alternative to an original signature for those documents requiring signature or acknowledgement in accordance with minimum standards.

Cranbrook Loans Group, Inc. does not mandate:

- Use of an electronic signature.
- Application to those internal operational type documents which require informal acknowledgement.
- Method or software utilized for any specific need, so long as the method adopted conforms to the minimum standards outlined in this policy.

This guideline applies to all employees/contractors of Cranbrook Loans Group, Inc. and applies to all forms of electronic signatures and electronic records used to conduct business of Cranbrook Loans Group, Inc.. Such business will include, but not be limited to origination/processing/closing of mortgage loans, electronic communications, transactions, and contracts.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

An inventory of all approved electronic signature methods will be maintained by senior management.

Compliance Management System

We have developed this Compliance Manual as an important step towards creating a complete Compliance Management System that meets the requirements of a CMS based upon the size and scope of our organization. We want to promote a 'culture of compliance' and address the risks we face, based upon our size, complexity, and products.

Compliance Management System Requirements:

- Establish internal controls and procedures using every source available (checklists, manuals, creditor training, agency, vendors, and regulator assessments)
- Regulator assessments
- Establish ongoing monitoring and prompt corrective action.
- Institute Annual Risk Assessments
- Accountability of all employees within the organization and disciplinary sanctions for non-compliance
- Immediately address any non-compliance, establish corrective action, and re- assess.
- Establish regular compliance training for all employees.
- Annual risk assessments (evaluate risks, effectiveness of controls and reports)
- Monitor trends in the industry.
- Develop a process to address consumer complaints.

Our CMS will be overseen by our Compliance Director, Michael Ayoub. Michael Ayoub is not a Company Owner.. Our Compliance Director holds primary responsibility for oversight and implementation of the program. This will include approving the content of the program and any changes. As the company grows, we may elect to use the services of a compliance firm to assess our operations and ensure we are meeting compliance standards.

Duties and responsibilities of the Compliance Director:

- Day-to-day management and oversight of the company's Compliance Management System
- Oversee a culture of compliance throughout the company by establishing an effective compliance risk management system.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Manage compliance risk across the entire organization.
- The implementation of strong preventative controls
- Provide a system of early detection of compliance risk issues.
- Continually assess the company's compliance risk exposure
- Develop corrective action or remediation plans for identifying compliance weaknesses and/or vulnerabilities. (Implementation of enhanced controls and procedures, additional training, loan level corrections, and any financial damages required)
- Ensure the company's compliance risk management system has sufficient resources.
- Require employee and management reports of non-compliance or risks and implement corrective action.
- Provide ongoing reporting to all management personnel on the overall company risk assessment.
- If a risk is detected, provide reporting as to the level and direction of the risk.
- The program will be reviewed and modified, if necessary, with any changes in the company's business model and practices or any regulatory changes
- Perform regular compliance reviews to assess adherence with company policies and procedures.
- Document and report all non-compliance issues that arise.
- Oversee all employee training, federal regulations as well as specific state regulations.

Employee Training

The company Compliance Director will be responsible for ensuring that all employees complete our internal training requirements. The specific training needs of each individual may vary depending on background and experience. Some new hires with little to no experience in the mortgage industry will require more initial training. Industry veterans may only need to take some refresher classes. Details of the training expectations will be reviewed upon hire.

Cranbrook Loans Group, Inc. must ensure that all staff are adequately trained in all areas that impact their position. At a minimum, all staff involved with the origination of mortgage loans should take annual training in the following areas:

- Anti-Money Laundering

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Identity Theft Prevention
- Information Security

Courses may be conducted internally by the Compliance Director or will be conducted online through an education provider. Whether courses are handled internally or through an outside vendor, proof of completion is required.

Staff are encouraged to seek out additional classes that can enhance their knowledge of the mortgage industry, help him/her better perform in the position, or meet personal professional development goals. This training can include, but is not limited to:

- Fraud Detection
- Equal Credit Opportunity Act (ECOA) & Regulation B
- Unfair, Deceptive, Abusive Acts and Practices (UDAAP)
- RESPA and Regulation X, including referrals and affiliated business relationships
- Regulation Z
- TRID Compliance
- MLO Compensation and Anti-Steering

The Compliance Director is also required to complete additional compliance oversight and compliance management courses on an annual basis.

Risk Assessment

We conduct an annual assessment, as well as ongoing review, of our compliance risk exposure arising from our operating environments, regulatory landscape, emerging trends, the company's size, complexity, and product offerings, and the effectiveness of internal controls.

This evaluation includes:

- Operational controls
- Systems and technology
- Compliance oversight/governance
- Training
- Potential for fraud
- Financial loss
- Non-compliance with laws and regulations
- The potential harm to consumers and impact on regulatory risk.

We conduct this risk assessment annually (more often if risk events occur) to identify compliance risks that could impact us.

The steps we take in this assessment:

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Identify the risks associated with each risk category identified above.
- Determine the likelihood that an event will or can occur.
- Assess the impact if such an event occurs.

What we do to mitigate or eliminate such risks. The result is the 'mitigated' risk.

We will rate these risks on a scale of low, moderate, or high. When layering occurs - such as a risk to the company, the customer and/or the regulator, we apply the highest rating to assess the risk.

The company will use a scale of Low risk, Moderate and High Risk when evaluating risk level.

Ratings and Audit Frequency:

Our internal audits will be made and use the days and audit frequency (annual, semi-annual, 3 months according to risk ratings below).

Low Risk	Does not involve consumer information. Regulatory compliance issues are unlikely. Categories of low risk will be reviewed on an annual basis.
Moderate Risk	Involves public consumer information. Risk areas could involve security, compliance, reputation, liquidity, and possible regulatory compliance issues. Categories of moderate risk will be reviewed on a semi-annual basis.
High Risk	Involves consumer non-public information. Several risk factors could be affected. Regulatory compliance issues are very possible. Categories of high risk will necessitate, at minimum, a review every 3 months. If the category involves non- public information, reviews may be increased to monthly.

Remediation and Corrective Action

When we learn of a compliance weakness, through personnel notification, monitoring, or testing, we will immediately take corrective action such as:

- Implementation of enhanced controls or procedures
- Additional training
- Loan level corrections
- Financial reparation

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Our goal is to operate honestly, fairly, and in compliance with the law. Oversight of operations is a key component to meeting this goal.

Loan Level Compliance

Please see our Quality Control Plan. As a mortgage broker and non-delegated correspondent lender, we review all loans prior to underwriting submission to ensure loan quality.

Compliance Risk Assessment

Operational Risks	Initial Rating	Mitigation Steps	Revised Rating
Physical disaster such as fire, flood, tornado, etc. causing inaccessibility of the office and business continuity	High	Business Continuity Plan will be initiated. Remote access contingencies.	Low
Physical access to office (unlocked doors, unmonitored visitors, theft)	High	No one has access to the office outside of company employees.	Low
Long term illness/death of an owner	Moderate	If a long-term illness or death of the owner occurred, the company would be forced to cease operation.	Moderate
Employee misrepresentation, incompetency, or dishonesty	High	The company will follow its written Quality Control Plan. If misrepresentation or incompetency is detected, additional training and monitoring will be initiated. If misrepresentation or incompetency is severe, termination of employee may be necessary.	Low
IT outage	High	Business Continuity Plan will be initiated Remote access contingencies.	Low

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Consumer complaints	High	A Consumer Complaint Resolution Policy has been established to immediately investigate and resolve all consumer complaints.	Low
Systems and Technology Risks	**Initial Rating**	**Mitigation Steps**	**Revised Rating**
Systems/Technology - Unauthorized access to computers, laptops, and loan files	High	Loan files are stored in a secure cloud service.	Medium
Inadequate IT resources to maintain systems	High	The company has IT personnel on staff.	Low
Outside vendor risk	High	Per our Vendor Management Policy, any non-regulated vendors will be initially vetted and reviewed on an annual basis.	Low
Financial Risks	**Initial Rating**	**Mitigation Steps**	**Revised Rating**
Repurchase Demand for U/W issues	High	As a mortgage broker and a non-delegated correspondent, loan files are underwritten by a credit lender. Credit lenders are also required to conduct random audits on loan files submitted to underwriting by third parties. The company also conducts pre-funding of loan files (see Quality Control Plan). If a repurchase demand arose, the company would work closely with the credit lender to resolve the repurchase request.	Low

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Consumer Harm Risks	Initial Rating	Mitigation Steps	Revised Rating
Non-public consumer Information - ID Theft	High	All loan files will be secured, and password protected. Employees will only have access to loan files they have originated and/or are processing.	Medium
Procedures for Third-party Vendors	High	Third party vendors for the company are primarily credit lenders and credit bureaus who are regulated and supervised. An annual review will be conducted per our Vendor Management Policy for non-regulated vendors (contract processing companies, IT companies, etc.).	Low
Compliance Risks	**Initial Rating**	**Mitigation Steps**	**Revised Rating**
Required disclosures are not provided in a timely manner	Medium	The company operates as a mortgage broker and non-delegated correspondent and the initial disclosure package is generated by the credit lender. The Compliance Director will review the application package provided by each approved lender. Any disclosures not provided to the consumer by the lender will be provided to the consumer by the company.	Low
RESPA Section 8 violations	Medium	Company onboarding includes training	Low

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

		regarding unearned fees and kickbacks (RESPA- Section 8). Any affiliated business requests or joint marketing requests will be reviewed by our Compliance Director and senior management. Legal advice may also be requested.	
Poor state exam results and potential fines for individuals operating as Mortgage Loan Originators without proper licensing.	High	Company adheres to its SAFE Act Policy. An employee/contractor will not act as a Mortgage Loan Originator unless they are properly licensed. No unlicensed employee/contractor may discuss interest rates or terms with the consumer. Onboarding and annual training include SAFE Act training.	Low
MLO Compensation	High	Our Loan Officer Compensation Agreement has been updated based upon a previous state examination.	Low
Fair Lending Violations	High	All employees will receive annual fair lending training.	Low
Incorrect data reflected in MCRs	High	The company has delegated the processing of MCR reporting to one individual within the company.	Low
Management Oversight	High	All Compliance Director	Low

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

		responsibilities listed in this matrix would include senior management oversight. If an individual is designated as the Compliance Director and is not an owner of the company, senior management will require regular meetings and written reports proving that all Compliance Director duties and responsibilities are completed satisfactorily.	
Employee violation of company Advertising Rules	Our company Compliance Manual	The compliance officer will periodically search the internet to ensure no advertising has been posted without consent and approval.	Low
Senior management not filing reports adequately or timely which could lead to a company shutdown	High	The company has delegated the responsibility for ensuring timely and accurate filings to a dedicated set of individuals internally.	Medium
Management unaware of regulatory changes	Medium	Management or Compliance Officer will subscribe to several industry websites that inform industry of any regulatory changes.	Low
Compliance Director not sufficiently qualified and fails to disseminate regulatory changes	High	The Compliance Director will disseminate any compliance manual updates to all origination staff.	Medium

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

provided by outside compliance firm		Senior management will require confirmation from the Compliance Director that dissemination was complete.	
Training Risks	**Initial Rating**	**Mitigation Steps**	**Revised Rating**
Required staff training not completed	Medium	The Compliance Director will maintain a training log for all staff training. Log will contain employee name, course name, and date of completion.	Low
Effectiveness of Training	Medium	The company will only use approved NMLS education providers. All courses require students to successfully complete quizzes and/or exams before certificates are issued.	Low
Compliance Director training not completed	Medium	Compliance officer subscribes to multiple compliance newsletters.	Low
Fraud Risks	**Initial Rating**	**Mitigation Steps**	**Revised Rating**
Employees unaware of current Red Flags	Medium	Fraud and Red Flag training will be conducted at time of hire and annually thereafter for all staff.	Low
Lack of fraud training	Medium	Compliance Director will require annual training of staff to include fraud training.	Low
Borrower Fraud	Medium	All loan documents are reviewed and verified to reduce borrower fraud.	Low

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

While a documented annual risk assessment is important, we strive to ensure that our company's risks are mitigated on daily basis and encourage anyone that notices or experiences anything that would compromise our ability to function in compliance with state and federal law to immediately bring that to the attention of Senior Management.

Complaint Resolution

It is the policy of Cranbrook Loans Group, Inc. to respond promptly and accurately to any consumer complaint about any aspect of our products, services, or the way the customer perceives that he/she has been treated. All complaints will be promptly directed to the Compliance Director for investigation and resolution.

Complaints can be received from multiple channels, including directly from the consumer by mail or email, from a state or federal regulator, on social media, or other method; Cranbrook Loans Group, Inc. does not require that complaints be sent to one main address. If the complaint is received orally, the employee/contractor receiving the complaint will make a written memorandum that can be sent to the Compliance Director. The write-up should identify the person making the complaint and include the details of the complaint. The details of any anonymous complaints will be documented and investigated; however, the response options may be limited because of the person remaining anonymous.

Most consumer complaints stem from an action, or inaction, of an employee/contractor that the consumer feels was inappropriate, harmful, discriminatory, or in violation of state or federal law. There may or may not be merit to a complaint; regardless, all complaints received will be investigated with the goal of determining the root cause and implementing corrective action to ensure no additional consumers experience the same or similar experience. Corrective action implemented will be determined on a case-by-case basis; however, some appropriate actions include modifying policies and procedures, providing additional training to employee(s)/contractor(s), and increased monitoring/review to ensure remediation.

Cranbrook Loans Group, Inc. will ensure an investigation is completed before responding to any complaint. To ensure all complaints are addressed timely, anyone receiving a complaint shall forward it to the Compliance Director within 5 business days. The Compliance Director shall provide a complaint acknowledgment letter to the consumer within 15 business days of the initial complaint received date, and work to ensure that a response is provided within 60 days of the initial complaint.

If the investigation reveals that a violation of state or federal law has occurred, employee(s)/contractor(s) have acted inappropriately or in violation of Cranbrook Loans Group, Inc. policy, Senior Management will be informed of the compliant and have input into the response and remediation process taken. Depending on the nature of the violation or inappropriate action, it may be necessary to research or review other files that have the same or similar pattern, MLO, or other relevant facts or scenarios to

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

determine if others have experienced the violation or inappropriate action. Retrospective remediation to all consumers harmed by a particular action may be required.

The Compliance Director will retain a copy of each complaint, any supporting documentation, and the company's response for a minimum of five (5) years. All written complaints will be responded to in writing. Oral complaints may be responded to orally; however, a written confirmation of the response will be sent to the customer. A prudent consumer complaint process will document the reason and outcome of the complaint in a central location for future review. By compiling a comprehensive list of complaints, Senior Management can be better positioned to spot trends that may need to be addressed at a higher level.

Document Retention

Cranbrook Loans Group, Inc. is a non-delegated correspondent lender and does not own or service mortgage loans. Cranbrook Loans Group, Inc. retains all mortgage loan records for 72 months after the mortgage loan is made or denied. The records are maintained electronically and when required, approved in advance, by the Commissioner. The loss of records, or potential loss will be immediately reported to the Commissioner when required by state law.

Each mortgage loan file will include all documentation that came into our possession or control during the loan process including, but not limited to, a copy of the application, initial disclosures, and closing documents, including a disbursement ledger from closing. We will also keep a copy of any applicable Broker Agreement between the borrower and any mortgage broker used in connection with the application, records of any finder's fees or compensation paid, and documentation obtained from the borrower that was necessary to underwrite the loan.

Loans that are denied or withdrawn will contain evidence of the date of denial or withdrawal by the applicant. Denied loans will be documented using an Adverse Action Notice. This same form can be used to document the date of withdraw from the applicant and close out the file. Other acceptable methods may be used, such as documenting a conversation in the notes section of our LOS, retaining an email chain from the borrower, or sending them a letter to confirm the date of withdrawal.

Loan files that are no longer in process, because they have closed, been denied, or withdrawn by the applicant, will have access restricted by the Compliance Director to those who need the information for legitimate business purposes. The Compliance Director will review the records set for destruction to ensure they have passed the time frame required to be held by law or regulation, are not necessary for business, or otherwise required to be kept. The records will be disposed of in a secure fashion, within two years of the last date the information was used or required to be held.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

In addition, Cranbrook Loans Group, Inc. retains, as applicable, prescreened solicitations, related selection criteria, complaints correspondence, including written statements alleging violations, and self-test documentation.

In the event Cranbrook Loans Group, Inc. files a Loan Application Register, Cranbrook Loans Group, Inc. will retain the information for a minimum of three (3) years.

Cranbrook Loans Group, Inc. retains all advertising for a minimum of five (5) years.

Fair Lending Policy

Both the Equal Credit Opportunity Act (ECOA) and The Fair Housing Act (FHAct) apply to lenders and mortgage brokers. ECOA seeks to promote the availability of credit to all creditworthy consumers without regard to race, color, religion, national origin, sex/gender, marital status, age, the fact that all or part of the consumer's income derives from public assistance or the fact that the consumer has in good faith exercised any right under the Consumer Credit Protection Act. ECOA also prohibits discrimination in any aspect of a credit transaction, including extensions of credit to individuals and businesses. The FHAct protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities. The FHAct applies to the direct provider of housing, such as landlords and real estate companies, as well as banks and other lenders making it unlawful for a lender to discriminate on a prohibited basis is a residential real estate related transaction.

As a mortgage broker and non-delegated correspondent lender, Cranbrook Loans Group, Inc. does not make credit decisions but relies upon the funding lender or end investor to make the credit determination. We believe in consistent, fair lending for all, and do not permit discrimination of any kind with respect to an applicant's race, color, religious creed, national origin, sex, gender identity, marital or familial status, sexual orientation, age (provided that consumer had the capacity to enter into a binding contract), handicap, or because all or a part of the consumer's income derives from any public assistance program. Cranbrook Loans Group, Inc. is limited to offering the loans its lenders/investors have available and will not impose a minimum loan amount. The maximum amount for mortgage loans will be determined by Fannie Mae, Freddie Mac, FHA, VA, USDA, the lender, and secondary market requirements.

No employee/contractor of Cranbrook Loans Group, Inc. will, in any manner, discourage a consumer from applying for credit. Cranbrook Loans Group, Inc. will accept an application from any consumer who wishes to submit a request for credit. While Cranbrook Loans Group, Inc. prefers to receive credit applications in writing or electronically; a licensed MLOs will assist a consumer with documenting an oral

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

application when taking one over the phone or during a face-to-face meeting. While MLOs and processors are prohibited from making credit decisions, or giving the consumer the impression a loan has been approved or denied, they are key in submitting the consumer's application to a creditor for the lending decision to be rendered, as well as ensuring the consumer is informed throughout the application process.

In order to prevent discrimination, it is important to understand how it can occur in mortgage lending and brokering. For this education, we will consult the Interagency Policy Statement on Discrimination in Lending issued in the Federal Register on April 15, 1994. The Federal Regulatory Banking Agencies collectively adopted this statement to provide guidance on the general principles the Agencies will consider when identifying lending discrimination in violation of ECOA and the FHAct. The Agencies' guidance identified ways that have been recognized as proof of lending discrimination, and offered examples for illustration:

- Overt evidence of discrimination, when a lender blatantly discriminates on a prohibited basis
    - A lender offered a credit card with a limit of up to $750 for applicants aged 21 - 30 and $1,500 for applicants over 30. This policy violated EOCA's prohibition on discrimination based on age.
- Evidence of disparate treatment, when a lender treats applicants differently based on one of the prohibited factors
    - Two minority loan applicants were told that it would take several hours and require the payment of an application fee to determine whether they would qualify for a home mortgage loan. In contrast, a loan officer took financial information immediately from nonminority applicants and determined whether they qualified in minutes, without a fee being paid. The lender's differential treatment violated both EOCA and the FHAct.
- Evidence of disparate impact, when a lender applies a practice uniformly to all applicants, but the practice has a discriminatory effect on a prohibited basis and is not justified by a business necessity
    - A lender rejected a loan application made by a female applicant with flaws in her credit report but accepted applications by male applicants with similar flaws. The lender offered the explanation that the rejected application had been processed by a new loan officer was unfamiliar with the bank's policy to work with applicants to correct credit report problems. However, an investigation revealed that the same loan officer who processed the rejected application had accepted applications from males with similar credit problems after working with them to provide satisfactory explanations. When a lender's treatment of two applicants is compared, even when there is an apparently valid explanation for a particular difference in treatment, further investigation may establish

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

> disparate treatment on a prohibited basis. For example, seemingly valid explanations for denying loans to minority applicants may have been applied consistently to minority applicants and inconsistently to nonminority applicants; or offsetting or compensatory factors cited as the reason for approving the nonminority applicants may involve information that the lender usually failed to consider for minority applicants but usually considered for nonminority applicants.

Redlining is a term that refers to the illegal practice of refusing to make residential loans or imposing more onerous terms on any loans made because of the predominate race, national origin, etc. of the residents of the neighborhood in which the property is located. Redlining violates both ECOA and the FHAct. Cranbrook Loans Group, Inc. does not engage in redlining; applications from all areas, of all states, in which we are licensed to do business, will be accepted.

In addition to ensuring fairness during the application process, the Compliance Director at Cranbrook Loans Group, Inc., will ensure its marketing and advertising efforts do not discriminate. Section 804(c) of the Fair Housing Act prohibits making, printing, and publishing of advertisements which state a preference, limitation, discrimination of the basis of race, color, religion, sex, handicap, familial status, or national origin. This prohibition applies to the publishers, as well as the person placing the advertisement. It also applies to advertisements where the property is exempt, but the ad violates the Act. The selective use of advertising media or content, when used in particular combinations, can lead to discriminatory results. For example, the use of an English language media or publication alone, or the exclusive use of media or publication, catering to the majority of the population, when in an area where there are also non-English, or other minority language media or publications available. The following examples of selective advertising may be viewed as discriminatory:

- The selective geographic placement of billboards, advertisements, or other media so that it is targeted at reaching only particular segment of the community
- Selective use of the Equal Housing Opportunity logo or slogan
- Selective use of human models that cater to one racial or national origin segment of the population without a complementary advertising campaign directed at other groups or segments of the population

An Equal Housing Opportunity logo, statement, or slogan is required on all ads. Appendix 1 to Part 109 - Fair Housing Advertising will be reviewed for specific size and space requirements.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Equal Credit & Opportunity Act

15 USC § 1692

Overview

ECOA seeks to promote the availability of credit to all creditworthy consumers without regard to race, color, religion, national origin, sex/gender, marital status, age, the fact that all or part of the consumer's income derives from public assistance or the fact that the consumer has in good faith exercised any right under the Consumer Credit Protection Act.

In an interpretive rule issued in 2013, the Consumer Financial Protection Bureau clarified that with respect to any aspect of a credit transaction, the prohibition against sex discrimination under ECOA encompasses sexual orientation and gender identity, including discrimination based on an actual or perceived nonconformity with sex-based or gender-based stereotypes and discrimination based on an consumer's associations.

The act, as implemented by Regulation B, states that individuals applying for loans and other credit can be evaluated only using factors directly related to their creditworthiness. It prohibits creditors and lenders from considering factors that are unrelated to their creditworthiness-specifically, the following protected classes:

- Race
- Color
- Religion
- National origin
- Sex (including gender, sexual orientation, and gender identity, as clarified by the CFPB in 2021))
- Marital status
- Age (provided the consumer is old enough to enter into a legal contract)
- Participation in a public assistance program
- The good faith exercise of any right under the Consumer Credit Protection Act

In general, ECOA:

Prohibits discrimination in a credit transaction on the basis of sex, marital status, race, color, religion, national origin, age, receipt of public assistance benefits, and/or the borrower's good faith exercise under the Consumer Credit Protection Act.

- Establishes rules for requesting information and using information during the loan application process.
- Prohibits questions regarding birth control practices or childbearing intentions.
- Specifies how to evaluate the credit history of accounts on which both spouses are contractually liable.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Permits consumers to apply for individual or joint credit.
- Regulates consideration of alimony and child support payments and discounting of part-time or spouse's income.
- Allows the consumer to use his or her surname at birth, or that of the spouse, or a combination thereof.
- Limits inquiries as to marital status.
- Requires all terms in the loan application forms to be neutral as to sex.
- Requires credit history information to be reported in the names of both spouses when both are contractually liable.

On September 29, 2016, the Consumer Financial Protection Bureau published in the Federal Register their approval of Fannie Mae/Freddie Mac's Uniform Residential Loan Application ("URLA" form 1003/70) as complying with ECOA and its implementing Regulation B.

Therefore, in order to assure compliance with ECOA, Cranbrook Loans Group, Inc.'s MLOs are required to follow the URLA and use only language included on the URLA when taking an application by phone and/or assisting the consumer in completing their application.

Cranbrook Loans Group, Inc. employees/contractors will not deny anyone the ability to apply for a mortgage loan irrespective of any known credit, asset, or employment issues.

Cranbrook Loans Group, Inc. employees/contractors are encouraged to provide information about loan products to potential customers, but he/she must not offer an opinion as to whether someone is likely to receive loan approval on a loan request. If an opinion is given, either verbally or in writing, under ECOA, an application has been made and full disclosure is required. Cranbrook Loans Group, Inc. employees/contractors can provide basic information on types of loan products, but they must be careful not to decide based upon the inquiry. Instead, the employee/contractor should encourage the individual to make an application. We will allow any interested inquirer to apply.

Notification of Action Taken

Section 1002.9(a) of Regulation B requires that creditors notify consumers of an action taken within 30 days of receiving the completed application.

Cranbrook Loans Group, Inc. is a mortgage broker and non-delegated correspondent lender, and as such, operates as the professional intermediary who arranges mortgage loans between the consumer and the underwriting wholesale lender/investor. We do not make credit decisions on our loans but rely on the expertise of our credit

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

lenders/investors to make that determination. Those lending partners issue an Adverse Action Notice to an applicant when warranted. When acting as a non-delegated correspondent lender, those notices should be issued in Cranbrook Loans Group, Inc.'s name, and when brokering it will be issued in the lender's name. A copy will be retained in the loan file.

ECOA Appraisal Valuation

Section 1002.14 of Regulation B requires that creditors provide copies of the appraisal and other written valuations to the consumer promptly upon completion, or no later than three business days prior to consummation or account opening, whichever is earlier. Consumers can waive delivery until closing; however, this must be done at least three business days prior to consummation or account opening and be documented in the loan file. If a loan does not close, the consumer is entitled to a copy of the appraisal within 30 days after the creditor determines consummation will not occur or the account will not be opened. Cranbrook Loans Group, Inc. will provide a copy of the appraisal to the consumer.

Fair Housing Act

42 USC 3601

Overview

The Fair Housing Act protects people from discrimination when they are renting or buying a home, getting a mortgage, seeking housing assistance, or engaging in other housing-related activities and applies to the direct provider of housing (such as landlords and real estate companies) as well as banks and lending institutions.

A mortgage loan originator can be in violation of Fair Housing by redlining (refusing to take applications in a particular neighborhood).

The Fair Housing Act makes it unlawful to engage in the following practices based on race, color, national origin, religion, sex, familial status, or handicap (disability):

- Refuse to make a mortgage loan.
- Refuse to provide information regarding loans.
- Impose different terms or conditions on a loan, such as different interest rates, points, or fees.
- Discriminate in appraising property.
- Refuse to purchase a loan or set different terms or conditions for purchasing a loan.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

This Act also requires the use of the Equal Housing Opportunity logo, slogan, or statement in advertising.

Procedures

Cranbrook Loans Group, Inc. employees/contractors will not deny anyone the ability to apply for a mortgage loan irrespective of any known credit, asset, or employment issues. Cranbrook Loans Group, Inc. employees/contractors can provide basic information on types of loan products, but they must be careful not to decide based upon the inquiry. Instead, the employee/contractor should encourage the individual to make an application. We will allow any interested inquirer to make an application.

Unfair, Deceptive, or Abusive Acts or Practices (UDAAP)

Fair lending doesn't end with the ECOA and FHAct. Fair lending extends throughout all federal consumer protection statutes to some degree. It is the policy of Cranbrook Loans Group, Inc. to comply with the prohibitions against unfair, deceptive, and abusive acts and practices. This includes Unfair or Deceptive Acts or Practices (UDAP) under Section 5 of the Federal Trade Commission Act (FTC Act), as well as Unfair, Deceptive, or Abusive Acts or Practices (UDAAP) pursuant to the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act).

Section 5 of the FTC Act, prohibits, in part, "unfair ... acts or practices in or affecting commerce". According to the FTC's Policy on Unfairness, dated December 17, 1980, "the present understanding of the unfairness standard is the result of an evolutionary process. ... By 1964 enough cases had been decided to enable the Commission to identify three factors that it considered when applying the prohibition against consumer unfairness. These were: (1) whether the practice injures consumers; (2) whether it violates established public policy; (3) whether it is unethical or unscrupulous."

The policy goes on to clarify that for an injury to be unfair the injury must be substantial, it cannot be reasonably avoided by the consumer, and it is not outweighed by countervailing benefits to consumers or to competition. When determining whether a practice is unfair, the Commission can consider whether the conduct violates public policy as it has been established by statute, common law, industry practice, or otherwise. Lastly, the policy clarifies that the Commission views the steps necessary to determine whether an act or practice is unethical or unscrupulous is duplicative of standard business ethics tests and will omit this when making a decision.

Like the policy statement on unfairness, the FTC Policy Statement on deception was published on October 14, 1983, to bring guidance to the public on how the concept of deception will be applied when evaluating acts and practices for compliance with the FTC Act. An act or practice is deceptive when there is a representation, omission or

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

practice that is likely to mislead the consumer acting reasonably in the circumstances, to the consumer's detriment. The Policy Statement clarifies to be deceptive it must be a "material" misrepresentation or practice, which is defined as one which is likely to affect a consumer's choice of or conduct regarding a product. In other words, it is information that is important to consumers. If inaccurate or omitted information is material, injury is likely.

In addition to complying with the UDAP provisions of Section 5 of the FTC Act, financial institutions, including mortgage brokers and lenders, are required to comply with the unfair, deceptive, abusive, acts and practices (UDAAP) provisions related to providing financial products and services, as laid out in the Dodd-Frank Act. This Act bestows the Consumer Financial Protection Bureau (CFPB) with the authority to regulate and enforce these UDAAP provisions in the financial marketplace.

Much like Section 5 of the FTC Act, the standard for unfairness in the Dodd-Frank Act is that an act or practice is unfair when:

1. It causes or is likely to cause substantial injury to consumers;
    - Substantial injury usually involves monetary harm, which includes costs or fees paid by consumers as a result of an unfair practice. An act or practice that causes a small amount of harm to a large number of consumers may be deemed to cause substantial injury.
2. The injury is not reasonably avoidable by consumers; and
    - Consumers cannot reasonably avoid injury if the act or practice interferes with their ability to effectively make decisions or to take action to avoid injury. A key question is not whether a consumer could have made a better choice, but rather, did the act or practice hinder a consumer's decision making.
3. The injury is not outweighed by countervailing benefits to consumers or to competition.
    - Offsetting consumer or competitive benefits of an act or practice may include lower prices to the consumer or a wider availability of products or services resulting from competition.

Public policy, as established by statute, regulation, judicial decision, or agency determination, may be considered with all other evidence to determine whether an act or practice is unfair. However, public policy considerations by themselves may not serve as the primary basis for determining that an act or practice is unfair.

Just like in the FTC Act, a representation, omission, act or practice is deceptive when:

1. The representation, omission, act or practice misleads or is likely to mislead the consumer;

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- The FTC's Four Ps Test can assist in the evaluation of whether a representation, omission, act, or practice is likely to mislead:
    - Is the statement prominent enough for the consumer to notice?
    - Is the information presented in an easy-to-understand format that does not contradict other information in the package and at a time when the consumers' attention is not distracted elsewhere?
    - Is the placement of the information in a location where consumers can be expected to look or hear?
    - Is the information in close proximity to the claim it qualifies?

2. The consumer's interpretation is reasonable under the circumstances; and
    - Whether an act or practice is deceptive depends on how a reasonable member of the target audience would interpret the representation. When targeting a specific audience, such as older Americans, young people, or financially distressed consumers, the communication must be reviewed from the point of view of a reasonable person of that group.
3. The misleading representation, omission, act, or practice is material.
    - Information about the central characteristics of a product or service, such as costs, benefits, or restrictions on the use of availability, is presumed to be material. Express claims made with respect to a financial product or service are presumed material. Implied claims are presumed to be material when evidence shows the institution intended to make the claim. Claims made with knowledge that they are false are presumed to be material. And, omissions will be presumed to be material when the financial institution knew, or should have known, that the consumer needed the omitted information to evaluate the product or service.

In addition to unfair and deceptive acts or practices, the Dodd-Frank Act added a new category of abusive to the list of acts or practices the CFPB can evaluate when looking at fair lending and consumer protection. An act or practice is abusive if

1. It materially interferes with the ability of a consumer to understand a term or condition of a consumer financial product or service, or
2. Takes unreasonable advantage of the consumers'
    - Lack of understanding concerning the material risks, costs, or conditions of the product or service; or
    - Inability to protect their interests in selecting or using a consumer financial product or service; or
    - Reasonable reliance of a covered person to act in interests of the consumer.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Many times, the act or practice that results in a UDAAP violation is also a violation of another state or federal consumer protection statute or regulation. Therefore, by way of establishing policies and procedures in compliance with these regulations, Cranbrook Loans Group, Inc. inherently mitigates its UDAAP risks. Another step taken to mitigate UDAAP risks is to address and review all consumer complaints, which can be lodged directly with Cranbrook Loans Group, Inc., the Better Business Bureau, States Attorneys General, the FTC, the CFPB, state regulators, and online with consumer compliant boards such as www.ripoffreport.com. Social media and websites that allow consumer reviews, such as Yelp and Google, are also a source for consumers to voice their dissatisfaction. When addressing the complaint directly with the consumer, a UDAAP concern may not be apparent; however, topics, trends, or patterns may emerge during a review of all complaints could identify a potential area of concern.

Advertising Policy

Because a majority of UDAAP violations arise from a company's acts and practices that occur before consummation of a transaction, an advertising policy that includes steps to mitigate UDAAP risks is a critical element of our Compliance Management System. Not only does our advertising policy consider UDAAP compliance responsibilities, but it also includes those found in Regulations N and Z. While many states have individual advertising laws, companies that can comply with Regulations N and Z will likely be in compliance with the provisions in state law as well.

For the most complete definition of advertising and marketing material, we will reference the definition for Commercial Communication within Regulation N, which states "*Commercial communication* means any written or oral statement, illustration, or depiction, whether in English or any other language, that is designed to effect a sale or create interest in purchasing goods or services, whether it appears on or in a label, package, package insert, radio, television, cable television, brochure, newspaper, magazine, pamphlet, leaflet, circular, mailer, book insert, free standing insert, letter, catalogue, poster, chart, billboard, public transit card, point of purchase display, film, slide, audio program transmitted over a telephone system, telemarketing script, on-hold script, upsell script, training materials provided to telemarketing firms, program-length commercial ('infomercial'), the internet, cellular network, or any other medium. Promotional materials and items and Web pages are included in the term *commercial communication."* For practical purposes, this includes all solicitations, written advertisements, websites, social media posts and platforms, and business cards.

It is Cranbrook Loans Group, Inc.'s policy that all advertising be truthful and nondeceptive, reasonable, nondiscriminatory, and fair, and contain all required disclosures. Advertisements directed at consumers who are not financially sophisticated, the financially vulnerable, and the elderly will be scrutinized to ensure the message being conveyed is not deceptive. Employees/contractors who create

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

marketing material for Cranbrook Loans Group, Inc. must be aware of the requirements outlined in this advertising and marketing policy. The Compliance Director will ensure all advertisements are reviewed for compliance prior to use. In addition, the Compliance Director will be responsible for retaining copies of all advertisements. A list of all social media accounts, including those of MLOs, will be maintained, and monitored by the Compliance Director.

When creating marketing and advertising material, employees/contractors must consider industry best practices to avoid misleading consumers about the products and services we offer, including but not limited to:

- Reviewing all promotional materials to ensure they fairly and adequately describe the terms and conditions of the loan being offered and that they are not misleading, either affirmatively or by omission
- Ensure these materials do not use fine print, separate statements, or inconspicuous disclosures to correct potentially misleading headlines, and ensure there is a reasonable factual basis for all representations made
- Consider the sophistication and experience of the target audience; do not make claims, representations, or statements that could mislead members of the target audience about the cost, value, cost savings, benefits, or terms of the loan product or service being offered
- Avoid advertising a particular service will be provided in connection with an account if we do not intend or are not able to provide the service
- Avoid advertising terms that are not available to most customers

In addition, employees/contractors should be aware the following general advertising requirements apply to all ads generated by Cranbrook Loans Group, Inc.:

1. We will not advertise, print, display, publish, distribute, broadcast, or televise, in any manner, a statement or representation regarding rates, terms or conditions for a mortgage loan that is false, misleading, or deceptive
2. We will not solicit, advertise, or enter into a contract for a specific interest rate, discount points, or other financing term, unless that term is actually available at the time of the solicitation, advertising, or contracting with the lender; doing so would be misleading or deceptive communication
3. We will not advertise any interest rate without conspicuously disclosing the applicable annual percentage rate
4. We will retain evidence to support any advertised interest rate and APR calculation
5. We will not publish any advertisement that contains false, misleading, or deceptive statements or representations, or identifies Cranbrook Loans Group,

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Inc. by any name other than our licensed name and approved Doing Business As (DBA) names

In addition, all websites and social media platforms used to advertise or promote mortgage originations, will include the following information:

- MLO's name and NMLS ID Number
- Cranbrook Loans Group, Inc.'s name and NMLS ID Number
- A link to NMLS Consumer Access https://www.nmlsconsumeraccess.org/

Failure to include these items can result in a violation of state law.

The Fair Housing Act

This Act requires the use of the Equal Housing Opportunity logo, slogan, or statement in advertising.

Statement: We are pledged to the letter and spirit of the U.S. policy for the achievement of equal housing opportunity throughout the Nation. We encourage and support an affirmative advertising and marketing program in which there are no barriers to obtaining housing because of race, color, religion, sex, handicap, familial status, or national origin.

Logo: 

Slogan: Equal Housing Opportunity

When using the logo, slogan, or statement it should be in bold font and clearly visible. For advertisements in regularly printed media, such as newspapers and magazines, that use the logo, the size of the logo depends on the size of the ad space. For other advertisements, the size of the logo must be at least as big as the largest other logo in the ad.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Regulation N

In December 2011, the FTC's Mortgage Acts and Practices--Advertising Rule was codified as Regulation N and oversight passed along to the CFPB. Regulation N prohibits any person from making material misrepresentation, expressly or by implication, in any commercial communication, regarding any term of any mortgage credit product. The Regulation identifies nearly two dozen prohibited actions and prescribes record retention requirements for a period of twenty-four months from the last date the person made or disseminated the applicable commercial communication regarding any term of any mortgage credit product. Employees/contractors must be aware the following material misrepresentations are a violation of Section 1014.3 of Regulation N and avoid them:

a) The interest charged for the mortgage credit product, including but not limited to misrepresentations concerning:
    1. The amount of interest that the consumer owes each month that is included in the consumer's payments, loan amount, or total amount due, or
    2. Whether the difference between the interest owed and the interest paid is added to the total amount due from the consumer
b) The annual percentage rate, simple annual rate, periodic rate, or any other rate
c) The existence, nature, or amount of fees or costs to the consumer associated with the mortgage credit product, including but not limited to misrepresentations that no fees are charged
d) The existence, cost, payment terms, or other terms associated with any additional product or feature that is or may be sold in conjunction with the mortgage credit product, including but not limited to credit insurance or credit disability insurance
e) The terms, amounts, payments, or other requirements relating to taxes or insurance associated with the mortgage credit product, including but not limited to misrepresentations about:
    1. Whether separate payment of taxes or insurance is required; or
    2. The extent to which payment for taxes or insurance is included in the loan payments, loan amount, or total amount due from the consumer
f) Any prepayment penalty associated with the mortgage credit product, including but not limited to misrepresentations concerning the existence, nature, amount, or terms of such penalty
g) The variability of interest, payments, or other terms of the mortgage credit product, including but not limited to misrepresentations using the word "fixed"

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

h) Any comparison between:
    1. Any rate or payment that will be available for a period less than the full length of the mortgage credit product; and
    2. Any actual or hypothetical rate or payment

i) The type of mortgage credit product, including but not limited to misrepresentations that the product is or involves a fully amortizing mortgage

j) The amount of the obligation, or the existence, nature, or amount of cash or credit available to the consumer in connection with the mortgage credit product, including but not limited to misrepresentations that the consumer will receive a certain amount of cash or credit as part of a mortgage credit transaction

k) The existence, number, amount, or timing of any minimum or required payments, including but not limited to misrepresentations about any payments or that no payments are required in a reverse mortgage or other mortgage credit product

l) The potential for default under the mortgage credit product, including but not limited to misrepresentations concerning the circumstances under which the consumer could default for nonpayment of taxes, insurance, or maintenance, or for failure to meet other obligations

m) The effectiveness of the mortgage credit product in helping the consumer resolve difficulties in paying debts, including but not limited to misrepresentations that any mortgage credit product can reduce, eliminate, or restructure debt or result in a waiver or forgiveness, in whole or in part, of the consumer's existing obligation with any person

n) The association of the mortgage credit product or any provider of such product with any other person or program, including but not limited to misrepresentations that:
    1. The provider is, or is affiliated with, any governmental entity or other organization; or
    2. The product is or relates to a government benefit, or is endorsed, sponsored by, or affiliated with any government or other program, including but not limited to through the use of formats, symbols, or logos that resemble those of such entity, organization, or program

o) The source of any commercial communication, including but not limited to misrepresentations that a commercial communication is made by or on behalf of the consumer's current mortgage lender or servicer

p) The right of the consumer to reside in the dwelling that is the subject of the mortgage credit product, or the duration of such right, including but not limited to misrepresentations concerning how long or under what conditions a consumer with a reverse mortgage can stay in the dwelling

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

q) The consumer's ability or likelihood to obtain any mortgage credit product or term, including but not limited to misrepresentations concerning whether the consumer has been preapproved or guaranteed for any such product or term

r) The consumer's ability or likelihood to obtain a refinancing or modification of any mortgage credit product or term, including but not limited to misrepresentations concerning whether the consumer has been preapproved or guaranteed for any such refinancing or modification; and

s) The availability, nature, or substance of counseling services or any other expert advice offered to the consumer regarding any mortgage credit product or term, including but not limited to the qualifications of those offering the services or advice

Regulation Z

While Regulation N prohibits making material misrepresentations regarding any term of any mortgage credit product, employees/contractors must be aware that Regulation Z addresses advertisements for credit in general, with some specific prohibitions when credit is secured by a dwelling. Regulation Z has some different provisions concerning advertisements for open-end credit (Section 1026.16) and closed-end credit (Section 1026.24). Because most of our business is closed-end residential mortgage loans, it is important to note, the first thing the regulation states is that if an advertisement is going to state specific credit terms, it shall only include terms actually arranged or offered by the creditor. If an advertisement includes a rate of finance charge, it shall state the rate as an "annual percentage rate" (APR) and use that term. If the advertisement is for credit secured by a dwelling, it can include a simple annual rate that is applied to an unpaid balance, in conjunction with, but not more conspicuously than, the annual percentage rate.

Section 1026.24(d) of Regulation Z requires additional disclosures if an advertisement contains any of the following "trigger terms":

i. The amount or percentage of any downpayment

ii. The number of payments or period of repayment

iii. The amount of any payment

iv. The amount of any finance charge

The additional terms that must be included, as applicable, are as follows:

i. The amount or percentage of the downpayment

ii. The terms of repayment, which reflect the repayment obligations over the full term of the loan, including any balloon payment

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

iii. The "annual percentage rate", and if it may be increased after consummation, that fact

An advertisement that includes an example of a typical extension of credit with a statement of all applicable terms, trigger and additional, may be used to comply with the regulation.

When advertising a variable rate, closed-end credit transaction, secured by a dwelling, the advertisement must include specific information, including each simple annual rate of interest that will apply over the term of the loan. If the rate is determined by adding an index and margin, the rate disclosed must be based on a reasonably current index and margin. The ad must also include the duration each interest rate will apply, and the APR for the loan. To be in compliance with the requirements for variable rate ads, the information about each applicable rate must be disclosed with equal prominence and in close proximity to any advertised rate that triggered the disclosure. However, the APR for the loan can be disclosed with greater prominence than the other information.

In addition to including information about each rate that will apply over the term of the loan, advertisements for a variable rate loan, secured by a dwelling, that state the amount of the payment, must also include the following specific payment information

a) The amount of each payment that will apply over the term of the loan, including any balloon payments
b) The time frame each payment will apply
c) In an advertisement for credit secured by a first lien on a dwelling, the fact that the payments do not include amounts for taxes and insurance premiums, if applicable, and that the actual payment obligation will be greater

A television or radio advertisement containing trigger terms, can comply with the disclosure of the additional terms by clearly and conspicuously stating each of the additional terms or clearly and conspicuously state the APR and include a toll-free telephone number, along with a reference that the number can be used to obtain additional cost information. If an advertisement is distributed in paper form or through the internet for a loan secured by the consumer's principal dwelling, and the advertisement states the advertised extension of credit may exceed the fair market value of the dwelling, the advertisement shall clearly and conspicuously state that the interest portion of the credit extension that is greater than the fair market value of the dwelling is not tax deductible for Federal income tax purposes, and the consumer should consult a tax advisor for further information regarding the deductibility of the interest and charges.

In addition to requiring consumers receive accurate information concerning the terms of a loan, Regulation Z also prohibits certain acts or practices in advertising credit secured by a dwelling. Some of these prohibitions are also outlined in Regulation N; however,

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

for the sake of completeness to the requirements of Regulation Z, the following seven acts or practices are prohibited:

1. Using the word "fixed" to refer to rates, payments, or the credit transaction in an advertisement for variable-rate transactions or other transactions where the payment will increase
2. Making any comparison in an advertisement between actual or hypothetical credit payments or rates and any payment or simple annual rate that will be available under the advertised product for a period less than the full term of the loan
3. Making any statement in an advertisement that the product offered is a "government loan program", "government-supported loan", or is otherwise endorsed or sponsored by any Federal, state, or local government entity, unless the advertisement is for an FHA loan, VA loan, or similar loan program that is, in fact, endorsed by a Federal, state, or local government entity
4. Using the name of the consumer's current lender in an advertisement that is not sent by or on behalf of the consumer's current lender
5. Making any misleading claim in an advertisement that the mortgage product offered will eliminate debt or result in a waiver or forgiveness of a consumer's existing loan terms with, or obligations to, another creditor
6. Using the term "counselor" in an advertisement to refer to a for-profit mortgage broker, mortgage creditor, its employees, or persons working for the broker or creditor that are involved in offering, originating, or selling mortgages, and
7. Providing information about some trigger terms or required disclosures, such as an initial rate or payment, only in a foreign language in an advertisement, but providing information about the other trigger terms or required disclosures, such as information about the fully-indexed rate or fully amortizing payment, only in English in the same advertisement

Many of the open-end credit advertisement requirements mirror those of closed-end credit. Section 1026.16(d) of Regulation Z contains additional requirements for advertisements for home-equity plans as follows:

1. Advertisements that disclose finance charges and other charges that may be imposed as part of the plan, or the payment terms of the plan, "affirmatively or negatively" in the ad must also include any loan fee that is a percentage of the credit limit under the plan and an estimate of any other fees imposed for opening the plan, stated as a single dollar amount or a reasonable range; any periodic rate used to compute the finance charge, expressed as an APR; and the maximum APR that can be imposed in a variable-rate plan
2. Advertisements for loans with discounted initial interest rates that are not based upon an index and margin that will be used for later rate adjustments must

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

include the time frame the initial rate will be available and A reasonably current annual percentage rate that would have been in effect using the index and margin

3. Advertisements that contain any statement of any minimum periodic payment shall also state with equal prominence, and in close proximity to the minimum periodic payment statement, that a balloon payment will result, and the amount and timing of the balloon payment that will result if the consumer makes only the minimum payments for the maximum period of time that the consumer is permitted to make such payments
4. Advertisements that state any interest expense incurred under the home-equity plan is, or may be, tax deductible may not be misleading. Paper advertisements for a home-equity plan secured by a consumer's principal dwelling, that state the advertised extension of credit may exceed the fair market value of the dwelling, must clearly and conspicuously state the interest portion of the credit extension is greater than fair market value of the dwelling is not tax deductible for Federal income tax purposes, and the consumer should consult a tax advisor for further information regarding the deductibility of interest and charges
5. Advertisements for home-equity plans may not refer to the plan as "free money" or contain other misleading terms
6. Television or radio advertisements that contain any of the terms requiring additional disclosures can comply by stating the periodic rate used to compute the finance charge, expressed as an annual percentage rate, listing a toll-free number, and a reference this number can be used by consumers to obtain additional cost information
7. Advertisements may not refer to an annual percentage rate as "fixed", or use a similar term, unless the ad also specifies a time period that the rate will be fixed and the rate will not increase during that period, or if no such time period is provided, the rate will not increase while the plan is open

Regulation X

The Real Estate Settlement Procedures Act (RESPA) as implemented by Regulation X, prohibits paying for the referral of business. Cranbrook Loans Group, Inc. fully expects its employees/contractors to comply with these requirements.

As stated in Section 1024.14(b) of Regulation X, "No person shall give and no person shall accept any fee, kickback or other thing of value pursuant to any agreement or understanding, oral or otherwise, that business incident to or part of a settlement service involving a federally related mortgage loan shall be referred to any person. Any referral of a settlement service is not a compensable service, except as set forth in §

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

1024.14(g)(1). A company may not pay any other company or the employees of any other company for the referral of settlement service business."

A "thing of value" is broadly defined and "includes, without limitation, monies, things, discounts, salaries, commissions, fees, duplicate payments of a charge, stock, dividends, distributions of partnership profits, franchise royalties, credits representing monies that may be paid at a future date, the opportunity to participate in a money-making program, retained or increased earnings, increased equity in a parent or subsidiary entity, special bank deposits or accounts, special or unusual banking terms, services of all types at special or free rates, sales or rentals at special prices or rates, lease or rental payments based in whole or in part on the amount of business referred, trips and payment of another person's expenses, or reduction in credit against an existing obligation."

Cranbrook Loans Group, Inc. does not compensate settlement service providers--such as real estate agents, brokers, or title agents--for referrals or leads. We are committed to delivering exceptional customer service and providing loans that fulfil our clients' requirements efficiently. Referrals from fellow professionals are regarded as a testament to our dedication to client satisfaction. When entrusted with their friends, family, or business associates, we uphold high standards throughout the loan process. As we do not provide compensation for referrals, future opportunities rely on the quality of service we consistently deliver.

Cranbrook Loans Group, Inc. does not engage in marketing arrangement that serve as a way to disguise referral fees. MLOs that enter into marketing and advertising relationships with other settlement service providers, such as real estate agents, are required to split the cost proportionately and have the advertisement reviewed and approved by the Compliance Director or other senior manager prior to its use. Cranbrook Loans Group, Inc. will retain evidence of compliance for five years after the advertisement was used.

The Compliance Director or other senior manager may allow MLOs to engage in educational and promotional activities on behalf of Cranbrook Loans Group, Inc. provided invitation to the event is not conditioned on the referral of business. The event cannot defray the cost or expense of a settlement service provider that is able to refer Cranbrook Loans Group, Inc. business. For example, an MLO may host a lunch and learn seminar for real estate agents on a specific topic, such as 203K loans, that is free for agents to attend. However, MLO may not host a lunch and learn seminar that provides free continuing education for real estate agents. Approval will be communicated in writing and must be obtained prior to the event.

Cranbrook Loans Group, Inc. will permit MLOs to cover a meal expense for a settlement service provider, only if the meal was provided during a networking meeting and not for the referral or business, or for the expectation of a business referral. The MLO must

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

use reasonable judgement when providing meals to ensure the expenses incurred are reasonable and are not considered a thank you for past or future business. State regulators can cite violations based on pattern or practice, so it is critical these activities are in compliance and documented so that we can demonstrate compliance during a state examination.

Lastly, just as Cranbrook Loans Group, Inc. does not pay referral fees, we do not accept them either.

Social Media

Social media consists of websites and applications that enable users to create and share content or participate in social networking. For Cranbrook Loans Group, Inc., social media is simply another form of advertising and must comply with all the requirements outlined above. However, this form of advertising is unique in that social media is an interactive platform that allows businesses and consumers to engage in back-and-forth dialog while also marketing a company's products and services. This combination creates another level of risk that does not exist in outward facing advertisements or marketing materials that do not provide a mechanism for conversation. To help mitigate those risks, Cranbrook Loans Group, Inc. incorporates this social media policy into its overall advertising policy.

To ensure we all have a baseline understanding of social media and how it functions, we will start our social media policy with some key definitions.

Social Media Channels - blogs, micro-blogs, social networks, video sharing, image sharing, podcasts, social bookmarks, user rating services and any other online collaboration, sharing or publishing platform, whether accessed through the web, a mobile device, or other existing or emerging communications platform.

Social Media Account - a personalized presence on a social networking channel, initiated by an individual which they can use to collaborate, interact, and share content and status updates. Accounts can be individual or business accounts.

External vs Internal Social Media Channels - external social media channels are social media services that do not reside in a domain. Internal social media channels are located at a company-owned domain, require a password to access and are only visible to employees/contractors and other approved individuals.

Copyrights - the exclusive legal right granted to an author to exclusive publication, product, sale, or distribution of a literary, musical, dramatic, or artistic work. It is illegal to reproduce and use copyrighted material through social media channels without the permission of the copyright holder.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Housing Content - text, pictures, audio, video, or other information in a digital form that is uploaded and resides in the social media account of the author. Downloading content off the internet and uploading it to your social media site is considered hosting that content. This distinction is important as it is generally illegal to post copyrighted content publicly on the internet without first obtaining permission of the copyright holder.

Embedded Codes - unique codes that are provided to entice others to share online content without requiring the sharer to host that content. By means of embedded code, it is possible to display a YouTube user's video in another individual's social media account without requiring that person to host the source video file. This distinction is important because embedded codes are often used by copyright owners to encourage others to share their content via social media channels.

Official Content - publicly available online content created and made public by a company, verified by virtue of its accessibility through a corporate website.

Inbound Links - an inbound link is a hyperlink that transits from one domain to another. A hyperlink that transmits from an external domain to your own domain is referred to as an inbound link. Inbound links are important because they play a role in how search engines rank pages and domains in search results.

Link Bartering Exchanges - trading or purchasing inbound links from other domains exclusively for the purpose of lifting your domain search engine page results.

As we engage with consumers via social media, Cranbrook Loans Group, Inc. expects employees/contractors to be transparent in every interaction, protect the privacy of consumers and others, respect copyright and trademarks, and not knowingly align with organizations or websites that use excessive tracking software, adware, malware, or spyware. To ensure the image and message of Cranbrook Loans Group, Inc. is consistent across social media platforms and in line with the company's mission and values, only those individuals officially designated by senior management to speak on our company's behalf can engage in posting, commenting, liking, sharing, or other activity on any social media platform in Cranbrook Loans Group, Inc.'s name. Employees/contractors are prohibited from advertising Cranbrook Loans Group, Inc.'s products and services on social media without prior approval of senior management. MLOs must include their NMLS number on all social media advertising. Employees/contractors are expected to act with professional decorum when engaging on social media, as their actions can impact the reputation of Cranbrook Loans Group, Inc., as well as their own. As such, it is an industry best practice that employees/contractors keep Cranbrook Loans Group, Inc. related social media accounts separate from personal accounts.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Once approval to advertise or participate in social media has been communicated, the employee/contractor must follow the following policies:

- Social media use should not interfere with one's primary job responsibilities and personal use of social media is prohibited on company time and equipment
- Always be respectful of everyone's right to express their opinion, even when it is not in line with yours, or is critical of Cranbrook Loans Group, Inc.
- Do not engage in any activity that could result in a hostile work environment
- Do not publish, post, or release any information that is considered confidential and not public
- Do not share anything that would violate another employee/contractor's right to personal privacy, including pictures, videos, or audio recordings without their permission
- Do not reference customers, partners, or lenders by name, or any details of their transaction without first obtaining their permission. Additionally, employees/contractors should get appropriate permission to use a third party's copyrighted material or other intellectual property prior to its use
- Clearly identify yourself as an employee/contractor of Cranbrook Loans Group, Inc.
- Should an encounter on social media start to become antagonistic, the employee/contractor should disengage from the conversation in a polite manner and seek the advice of senior management
- Employees/contractors should refer any media/press questions or legal questions to an authorized representative of Cranbrook Loans Group, Inc.
- Only refer to mention a company policy, if that policy is publicly available on the internet, and a link to the policy is included in the post. If an employee/contractor chooses to share an opinion on Cranbrook Loans Group, Inc. policy, they may do so only if the precede with a disclaimer that their personal opinion does not necessarily reflect the opinion of their employer. This requirement is meant to ensure others can easily distinguish the official position of our company from those of our employees/contractors

Remembering social media is advertising that must comply with all state and federal laws and acting responsibly when engaging on social media platforms are key to mitigating the compliance, operational, and reputation risks that could arise from having a social media presence. Failure for employees/contractors to follow this policy can result in rescission of their approval to post on social media, disciplinary action up to and including termination, and civil or criminal penalties, as provided by law.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Telemarketing Policy

Telemarketing is another form of advertising that creates risks Cranbrook Loans Group, Inc. must mitigate. Employees/contractors must be aware that outbound sales calls are advertising and must comply with Regulations N and Z, and any state laws that govern activities where a subject property is located. Cranbrook Loans Group, Inc. does not allow anyone without a license to discuss rates and terms or offer or negotiate mortgage loans. Cranbrook Loans Group, Inc. does not allow unlicensed individuals to collect any of the six pieces of information required for a complete application; this does not include public consumer information that may be on purchased lead lists. The moment it becomes clear that a consumer would like to apply for a mortgage loan, Cranbrook Loans Group, Inc. will ensure the consumer is speaking to an MLO licensed in the state where the subject property is located.

In addition to the general advertising requirements, telemarketing calls and campaigns must comply with federal regulations enacted to curb abusive telemarketing practices and to cut down on the number of unwanted solicitation telephone calls, facsimiles, and text messages.

- Telephone Consumer Protection Act (TCPA) of 1991, as implemented by Title 47, Chapter 1, Subchapter B, Part 64, Subpart L - Restrictions on Telemarketing, Telephone Solicitation, and Facsimile Advertising, and
- Telemarketing and Consumer Fraud and Abuse Prevention Act of 1994, as implemented by Telemarketing Sales Rule

These regulations have been updated over the years to adapt to changes in the way we communicate, as well as other factors impacting telephone solicitation under the purview of the Federal Communications Commission and Federal Trade Commission. Employees/contractors should be aware that facsimiles sent for solicitation purposes must comply with the regulations, but the regulations are not applicable to email. That being said, Cranbrook Loans Group, Inc. will not engage in advertising email campaigns that are not in line with the Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003, as implemented by the CAN-SPAM Rule.

As defined in Section 64.1200(k)(13) of Subpart L, Restrictions on Telemarketing, Telephone Solicitation, and Facsimile Advertising, "telemarketing" means the initiation of a telephone call or message for the purpose of encouraging the purchase or rental of, or investment in, property, goods, or services, which is transmitted to any person. For purposes of our compliance, employees/contracts should be aware that phone calls (and text messages) must comply with the requirements if they are (1) made using an automatic telephone dialing system or an artificial or prerecorded voice, (2) it includes or introduces an advertisement or constitutes telemarketing, and (3) the caller has not obtained prior express written consent of the called party. This includes not initiating

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

any telephone solicitation to any telephone number assigned to a paging service, cellular telephone service, specialized mobile radio service, or other radio common carrier service, or any service for which the called party is charged for the call. In addition, calling a residential telephone subscriber before the hour of 8 a.m. or after 9 p.m., local time at the called party's location, is prohibited.

In 2003, the National Do-Not-Call Registry was established, giving Americans the ability to opt out of receiving most telemarketing calls by putting their phone number on the registry. There are over 221 million numbers on the registry, www.donotcall.gov. According to the regulation, if a residential telephone subscriber has registered his/her number on the registry, the registration must be honored indefinitely, until the registration is cancelled by the consumer, or the telephone number is removed by the database administrator. Companies making solicitation calls using an artificial or prerecorded-voice are required to maintain their own do-not-call list of individuals who have requested to not be contacted. A do-not-call request must be honored for five years from the time the request is made.

The Telemarketing Sales Rule contains many of the same requirements as the TCPA, including actions regarding the Do-Not-Call Registry, and obtaining express authorization prior to making telemarking calls. It is important to note that this Rule applies to interstate telephone calls made for the purpose of inducing the purchase of goods or services. It does not contain the element of the call being "made using an automatic telephone dialing system or an artificial or prerecorded voice." Therefore, any sales calls we make must be in compliance with the Rule.

The Rule prohibits deceptive telemarketing acts and practices by both sellers and telemarketers. This includes failure to disclose material information, misrepresenting material information, and making false or misleading statements to induce any person to pay for a good or service. The Rule also prohibits abusive telemarketing acts or practices, including using threats, intimidation, or the use of profane or obscene language, and not transmitting the name and telephone number of the telemarketer to the caller identification service of the call recipient. The Rule contains additional examples of deceptive and abusive marketing activities that involve requesting or receiving payment, which are outside the scope of our activity as a mortgage originator and omitted from this policy.

The Telemarketing Sales Rule requires any seller or telemarketer to retain the following records related to its telemarketing activities for five years from the date the record is produced:

1. A record of each telemarketing call, including
    a. The telemarketer that placed or received the call

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

b. The seller or person for which the telemarketing call was placed or received

c. The good, service, or charitable purpose that is the subject of the telemarketing call

d. Whether the telemarketing call is to an individual consumer or a business consumer

e. Whether the telemarketing call is an outbound telephone call

f. Whether the telemarketing call utilizes a prerecorded message

g. The calling number, called number, date, time, and duration of the telemarketing call

h. The telemarketing script(s) and prerecorded message, if any, used during the call

i. The caller identification telephone number, and if it is transmitted, the caller identification name that is transmitted in an outbound telephone call to the recipient of the call, and any contracts or other proof of authorization for the telemarketer to use that telephone number and name, and the time period for which such authorization or contract applies, and

j. The disposition of the call, including but not limited to, whether the call was answered, connected, dropped, or transferred. If the call was transferred, the record must also include the telephone number or IP address that the call was transferred to as well as the company name, if the call was transferred to a company different from the seller or telemarketer that placed the call; provided, however, that for calls that an individual telemarketer makes by manually entering a single telephone number to initiate the call to that number, a seller or telemarketer need not retain the records specified in paragraphs 310.5(a)(2)(vii) and (a)(2)(x) of the Rule (which corresponds to letters g and j on our list)

2. For each prize recipient, a record of the name, last known telephone number, and last known physical or email address of that prize recipient, and the prize awarded for prizes that are represented, directly or by implication, to have a value of $25.00 or more

3. For each customer, a record of the name, last known telephone number, and last known physical or email address of that customer, the goods or services purchased, the date such goods or services were purchased, the date such goods or services were shipped or provided, and the amount paid by the customer for the goods or services

4. For each person with whom a seller intends to assert it has an established business relationship under Section 310.2(q)(2) of the Rule, a record of the name and last known telephone number of that person, the date that person submitted

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

an inquiry or application regarding the seller's goods or services, and the goods or services inquired about

5. For each current or former employee directly involved in telephone sales or solicitations, a record of the name, any fictitious name used, the last known home address and telephone number, and the job title(s) of that employee; provided, however, that if the seller or telemarketer permits fictitious names to be used by employees, each fictitious name must be traceable to only one specific employee
6. All verifiable authorizations or records of express informed consent or express agreement (collectively, "Consent") required to be provided or received under this part. A complete record of Consent includes the following:
    a. The name and telephone number of the person providing Consent
    b. A copy of the request for Consent in the same manner and format in which it was presented to the person providing Consent
    c. The purpose for which Consent is requested and given
    d. A copy of the Consent provided
    e. The date Consent was given, and
    f. For the copy of Consent provided under § 310.3(a)(3), § 310.4(a)(7), § 310.4(b)(1)(iii)(B)(1), or § 310.4(b)(1)(v)(A), a complete record must also include all information specified in those respective sections of this part
7. A record of each service provider a telemarketer used to deliver an outbound telephone call to a person on behalf of a seller for each good or service the seller offers for sale through telemarketing. For each such service provider, a complete record includes the contract for the service provided, the date the contract was signed, and the time period the contract is in effect. Such contracts must be kept for 5 years from the date the contract expires
8. A record of each person who has stated she does not wish to receive any outbound telephone calls made on behalf of a seller or charitable organization pursuant to § 310.4(b)(1)(iii)(A) including: the name of the person, the telephone number(s) associated with the request, the seller or charitable organization from which the person does not wish to receive calls, the telemarketer that called the person, the date the person requested that she cease receiving such calls, and the goods or services the seller was offering for sale or the charitable purpose for which a charitable contribution was being solicited, and
9. A record of which version of the Commission's "do-not-call" registry was used to ensure compliance with § 310.4(b)(1)(iii)(B). Such record must include:
    a. The name of the entity which accessed the registry
    b. The date the do-not-call registry was accessed

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

c. The subscription account number that was used to access the registry, and

d. The telemarketing campaign for which it was accessed

A seller or telemarketer may keep the records in the same manner, format, or place as they keep such records in the ordinary course of business. A seller and a telemarketer calling on behalf of a seller may, by written agreement, allocate the record keeping responsibility between themselves. If the agreement is not specific, or does not exist, both parties must retain the records. However, if a telemarketer bears the responsibility for the recordkeeping requirements of this section, the seller must establish and implement practices and procedures to ensure the telemarketer is complying with the requirements of this section. These practices and procedures include retaining access to any record the telemarketer creates under this section on the seller's behalf, because at the end of the day we are responsible for all activity that occurs under the license of Cranbrook Loans Group, Inc..

Advances in technology have opened the door for a proliferation of companies offering call center or telemarketing software and solutions. To comply with our vendor management policy, it is imperative that senior management select a service provider that will help us comply with the telemarketing rules and regulations. This would allow Cranbrook Loans Group, Inc. to hire employees/contractors to place the telemarketing calls in a cost-effective manner. Employees/contractors must follow telemarketing scripts provided by the Compliance Director.

At this time Cranbrook Loans Group, Inc. does engage in telemarketing.

CAN-SPAM Act

E-mail marketing campaigns have been a popular way to let consumers and referral partners know of the loan products services we have available. Any email marketing campaign initiated by Cranbrook Loans Group, Inc. will comply with the CAN-SPAM Act and Rule. According to the Rule, the primary purpose of a "commercial electronic mail message" is when a message consists exclusively of a commercial advertisement or promotion of a commercial product or service. Messages that contain transaction, relationship, or other information can still be deemed a commercial email when the subject line is interpreted as such, the transaction information is not complete or at the beginning of the message, or the body of the message is interpreted as a commercial message. Emails that are not commercial in nature are still subject to the provision that email cannot contain false or misleading routing information; this includes the "To" and "From" lines, and the domain name.

The CAN-SPAM Rule requires the sender to provide a mechanism for a consumer to easily opt-out of receiving future solicitation emails, by way of a return email address or other internet-based method, such as an unsubscribe link within an email. This method

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

must be able to process requests for at least 30 days after sending the commercial email. Commercial communication to that email address must end within 10 business days of receiving the request. And senders are prohibited from selling or transferring the email addresses of those who opted out of future emails. The subject line of a commercial email must not mislead the recipient about the contents of the email, and it must also include the sender's physical address and be identified as an advertisement.

In 2025, each separate email in violation of the CAN-SPAM Act is subject to penalties of up to $53,088. The sender, and any company hired to handle email marketing can be held responsible. Not to mention, misleading advertisements can face potential UDAAP violations and companies can be ordered to repay consumers. The CAN-SPAM Act provides criminal penalties, including imprisonment, for:

- Accessing some else's computer to send spam without permission
- Using false information to register for multiple email accounts or domain names
- Relaying or retransmitting multiple spam messages through a computer to mislead others about the origin of the message
- Harvesting email addresses or generating them through a dictionary attack
- And taking advantage of open relays and open proxies without permission

To reduce the financial and legal risks created by commercial email advertisements, all commercial email must be reviewed by the Compliance Director or Senior Management prior to use.

Fair Credit Reporting Act

The Fair Credit Reporting Act (FCRA) was passed and amended to ensure accuracy and privacy of the information used in consumer credit reports. Various amendments expand the consumer's rights and place additional requirements on consumer information and how it is used. Any company that supplies information about a consumer to credit reporting agencies and those that use consumer reports must abide by specific rules. In addition, the Act requires that consumers be provided with certain disclosures when their credit is pulled.

Background

The Fair Credit Reporting Act (FCRA) became effective on April 25, 1971. The FCRA is a part of a group of acts contained in the Federal Consumer Credit Protection Act such as the Truth in Lending Act and the Fair Debt Collection Practices Act.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Congress substantially amended the FCRA upon the passage of the Fair and Accurate Credit Transactions Act of 2003 (FACT Act) to ensure lenders make credit decisions based on full and fair credit histories and not discriminatory stereotypes. Its passage was also intended to improve the quality of credit information and protect consumers from identity theft by doing the following:

- Giving every consumer the right to their credit report free of charge every year.
- Requiring merchants to leave all but the last five digits of a credit card number off store receipts.
- Create a national system of fraud detection to make identity thieves more likely to be caught. Consumers need to make just one call to receive advice, set off a nationwide fraud alert, and protect their credit standing.
- Establish a nationwide system of fraud alerts for consumers to place on their credit files. Credit reporting agencies that receive such alerts are obliged to follow procedures to ensure that any future requests are by the true consumer, not an identity thief posing as the consumer. The law also enables active-duty military personnel to place special alerts on their files when they are deployed overseas.
- Requires regulators to devise a list of red flag indicators of identity theft, drawn from the patterns and practices of identity thieves. Regulators are required to evaluate the use of these red flag indicators in their compliance examination and impose fines where disregard of red flags has resulted in losses to customers.
- Requires lenders and credit agencies to take pre-emptive action. With oversight by bank regulators, credit agencies have established a set of guidelines to identify patterns common to identity theft and developed methods to stop identity theft before it can cause major damage.
- Requires financial institutions who obtain a credit score to provide the consumer with their credit score and additional information as soon as is reasonably practical. Typically, this disclosure is provided with other disclosures at application or as soon as the credit report is pulled.

In 2010, Congress passed the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), which granted rule-making authority under FCRA (except for Section 615(e) (red flag guidelines and regulation) and Section 628 (disposal of records) to the Consumer Financial Protection Bureau (CFPB). The Dodd-Frank Act also amended two provisions of the FCRA to require the disclosure of a credit score and related information when a credit score is used in taking an adverse action or when a lender uses the credit score in risk-based pricing models.

Procedures

Cranbrook Loans Group, Inc. is a mortgage broker company and as such does not collect borrower mortgage payments or supply information to any credit reporting agency. However, we do use credit reports when brokering loans and are required to provide the consumer with a copy of their Credit Score Disclosure pursuant to Section

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

609(g) of the FCRA. If the lender provides the disclosure during the application process, we are relived from that responsibility; however, applications that have credit pulled, but do not make it to a lender, we will ensure the consumer is provided with the disclosure.

The Credit Score Disclosure must contain the following information:

- The consumer's current credit score
- The date the score was created
- The range of possible scores under the model used
- All of the key factors that adversely affect the credit score (total need not exceed 4 factors)
- The name of person or entity that provided the score, and
- The Notice to Home Loan Applicant

The content of the Notice is required by Section 609(g)(1)(D) of the FCRA and is included with the credit report. The notice must state:

"Notice To The Home Loan Applicant

In connection with your application for a home loan, the lender must disclose to you the score that a consumer reporting agency distributed to users and the lender used in connection with your home loan, and the key factors affecting your credit scores.

The credit score is a computer generated summary calculated at the time of the request and based on information that a consumer reporting agency or lender has on file. The scores are based on data about your credit history and payment patterns. Credit scores are important because they are used to assist the lender in determining whether you will obtain a loan. They may also be used to determine what interest rate you may be offered on the mortgage. Credit scores can change over time, depending on your conduct, how your credit history and payment patterns change, and how credit scoring technologies change.

Because the score is based on information in your credit history, it is very important that you review the credit-related information that is being furnished to make sure it is accurate. Credit records may vary from one company to another.

If you have questions about your credit score or the credit information that is furnished to you, contact the consumer reporting agency at the address and telephone number provided with this notice, or contact the lender, if the lender developed or generated the credit score. The consumer reporting agency plays no part in the decision to take any action on the loan application and is unable to provide you with specific reasons for the decision on a loan application.

If you have questions concerning the terms of the loan, contact the lender."

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Because several acts and regulations impact the content and disclosure requirements of the consumer's credit score in the mortgage loan application process, model forms have been developed to ensure that all content is included. For example, the Credit Score Disclosure that prints at the end of the credit report is a model form that contain the content requirements outlined above and the requirement for a lender to disclose how the credit score compares to that of other Americans. This requirement was added when the Risk-Based Pricing Rule was established in 2010.

In addition, the Adverse Action Notice Model Form that is part of the Appendix of Regulation B, incorporates the regulation's disclosure requirements for when a loan application is denied and the FCRA's requirements to disclose a credit score and other information when information in the credit report is used to deny the loan. Section 615(a) of the FCRA requires the written disclosure of the adverse action taken, plus:

- The credit score used
- The range of possible scores under the model used
- All of the key factors that adversely affect the credit score (total need not exceed 4 factors)
- The date the score was created
- The name of person or entity that provided the score
- The name, address, and telephone number of the consumer reporting agency that provided the credit report
- A statement that the consumer reporting agency did not make the decision to take adverse action and is unable to provide the consumer with specific reasons why the adverse action was taken
- Inform the consumer of their right to obtain a free copy of a credit report from the consumer reporting agency by requesting it within 60 days of receiving the lender's adverse action notice, and
- Inform the consumer of their right to dispute the accuracy and completeness of the information contained in the credit report

The use of model forms is an easy way to help ensure we operate in compliance with the various laws and regulations that govern our activities.

Real Estate Settlement Procedures Act (RESPA) and Reg. X

Overview

RESPA was enacted by Congress in 1974 to help address problems in the real estate settlement process. The Act and its implementing Regulation X sought to increase transparency in real estate transactions, protect consumers from unfair practices, and

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

ensure consumers receive timely disclosures. As a mortgage broker, many of the requirements have been incorporated into our day-to-day procedures and referenced in various sections of our compliance manual, as appropriate. However, it is important that employees/contractors are aware of the following RESPA/Reg. X requirements.

Regulation X requires that borrowers receive disclosures at various times throughout the lending process. Some disclosures spell out the costs associated with the loan, outline servicing and escrow account practices, and describe business relationships between settlement service providers.

With the enactment of the TRID Rule, many of the regulation's disclosure requirements have been relocated to Regulation Z; however, employees/contractors should be aware of the following origination documents/disclosures required under Regulation X include the following:

- Affiliated Business Arrangement Disclosure (if applicable)
- List of HUD-Approved Credit Counseling Agencies, nearest available to the consumer, based on the current zip code of the consumer
- The Special Information Booklet, currently known as The Home Loan Toolkit, is required for all purchase transactions, or for open-end credit subject to Section 40 of Reg. Z, When Your Home is On the Line: What You Should Know About Home Equity Lines of Credit
- Initial Escrow Disclosure is provided by the lender to inform the borrower of the amount of money required to cover the taxes and insurance(s) related to the loan transaction, and
- Good Faith Estimate (GFE) and HUD-1 settlement statements for loans not subject to TRID, such as reverse mortgages

Having knowledge of the regulation's history and disclosure requirements helps to make better MLOs and processors.

RESPA Section 8

Section 8 of RESPA prohibits a person from giving or accepting anything of value for referrals of settlement service business related to a federally related mortgage loan. It also prohibits a person from giving or accepting any part of a charge for services that are not performed. These are also known as kickbacks, fee-splitting and unearned fees. Please refer to the Advertising Policy for more information.

If found in violation of RESPA, Section 8, both the person giving and the person receiving the referral fee can be charged up to $10,000 per violation as well as additional civil penalties.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

RESPA makes it a criminal offense to give or accept a fee for a service if that service is not actually performed, and no employee/contractor of Cranbrook Loans Group, Inc. may provide or accept anything of value in exchange for a referral.

Affiliated Business Relationships

Cranbrook Loans Group, Inc.'s Senior Management must approve, in advance, any Affiliated Business Relationships that an employee/contractor has with any company in a position to refer business to him/her. Examples of this would be:

- A mortgage loan originator that is also a real estate agent, financial planner, etc.
- Any Cranbrook Loans Group, Inc. employee/contractor that has ownership interest in any real estate/mortgage related company.
- An employee/contractor that has a familial relationship with anyone in a position to refer business to him/her.

It is important to remember that there can not be "required use" of the affiliated business, as such a condition would be in violation of Section 15(b)(2) of Regulation X. In addition, if Cranbrook Loans Group, Inc. approves the relationship, the borrower must sign an Affiliated Business Relationship Disclosure at the time the referral is provided (this will usually be at the time of application).

Truth-in-Lending Act (TILA) and Reg. Z

Overview

The Truth in Lending Act (TILA) is a federal law designed to promote the informed use of consumer credit, by requiring disclosures about its terms and cost to standardize the way costs associated with borrowing are calculated and disclosed. (Does not apply to commercial loans).

Appraisal Independence Policy

Cranbrook Loans Group, Inc. operates as a mortgage broker and non-delegated correspondent. As such, the appraisal selection is determined by the creditor.

Because the appraisal is a critical component of the loan underwriting decision, for all federally related transactions, appraisals are to be performed in accordance with the standards and requirements set forth in the Uniform Standards of Professional Appraisal Practice (USPAP) and any other supplemental guidelines issued, including those regarding non-discrimination requirements and fair lending practices. Cranbrook Loans Group, Inc. prohibits appraisal practices that consider race, color, religion, sex, handicap, familiar status, national origin, or any other prohibited basis, of the

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

prospective owners or occupants of the subject property, or of the present owners or occupants of the properties in the vicinity of the subject property.

This policy applies to loans secured by 1-4-unit residential properties that are delivered to Fannie Mae, Freddie Mac, and any other investor, as applicable under our first mortgage program and underwritten according to Fannie Mae, Freddie Mac, FHA, VA, and any other investor.

It is the policy of Cranbrook Loans Group, Inc. to comply with the Appraiser Independence Requirements (AIR) in Regulation Z and any other investor guideline, such as Fannie Mae (SEL-2010-14), Freddie Mac (Bulletin 2010-23), FHA Appraiser Independence (ML 2009-28).

The requirements prohibit employees from influencing or attempting to influence the development, result, or review of an appraisal report.

Appraiser Independence Safeguards

1. An appraiser must be, at a minimum, licensed or certified by the state in which the property to be appraised is located.
2. Cranbrook Loans Group, Inc. values and is committed to maintaining appraiser independence. No employee, director, officer, or agent shall influence or attempt to influence the development, reporting, result, or review of an appraisal through coercion, extortion, collusion, compensation, inducement, intimidation, bribery, or in any other manner, including but not limited to:
    a. Withholding or threatening to withhold timely payment or partial payment for an appraisal report.
    b. Withholding or threatening to withhold future business for an appraiser or demoting or terminating or threatening to demote or terminate an appraiser, Expressly or impliedly promising future business, promotions, or increased compensation for an appraiser.
    c. Expressly or implied promise of future business, promotions, or increased compensation for an appraiser.
    d. Conditioning the ordering of an appraisal report or the payment of an appraisal fee or salary or bonus on the opinion, conclusion, or valuation to be reached, or on a preliminary value estimate requested from an appraisal report.
    e. Requesting that an appraiser provide an estimated, predetermined, or desired valuation in an appraisal report prior to the completion of the appraisal report or requesting that an appraiser provide estimated values or comparable sales at any

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

time prior to the appraiser's completion of an appraisal report.

f. Providing to an appraiser an anticipated, estimated, encouraged, or desired value for a subject property or a proposed or target amount to be loaned to the Borrower, except that a copy of the sales contract for purchase transactions may be provided.

g. Removing an appraiser from a list of qualified appraisers or adding an appraiser to an exclusionary list of disapproved appraisers, in connection with the influencing or attempting to influence an appraisal as described above (this prohibition does not preclude the management of appraiser lists for bona fide administrative or quality-control reasons based on written policy).

h. Any other act or practice that impairs or attempts to impair an appraiser's independence, objectivity, or impartiality or violate law or regulation, including, but not limited to, the Truth in Lending Act (TILA) and Regulation Z, or the Uniform Standards of Professional Appraisal Practice (USPAP).

The appraiser is to provide complete and accurate reports; to report neighborhood and property conditions in factual and specific terms; to be impartial and specific in describing favorable or unfavorable factors; and to avoid the use of subjective, racial, or stereotypical terms, phrases, or comments in the appraisal reports. The opinion of market value must represent the appraiser's professional conclusion based on market data, logical analysis, and judgment.

Appraiser Engagement

Most of our investor partners use an Appraisal Management Company to ensure the selection of an appraiser is independent of the loan production staff. While AIR does not define loan production staff, federal agencies state that loan production staff is an employee whose compensation is based on loan volume or the closing of a loan transaction.

No member of the sales or loan production staff will have any prohibited communication with an appraiser or authorized appraisal management company ("AMC") that would in any manner, attempt to have an impact on the valuation. Prohibited communication includes:

- Seeking to influence the valuation to report a minimum or maximum value of the dwelling
- Withholding or threatening to withhold payment because the value did not reach a certain amount
- Implying future use the appraiser is dependent upon the dwelling reaching a certain value

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Excluding a person from future use because they failed to meet a certain value on a dwelling
- Conditioning payment on a dwelling reaching a certain value

However, there are certain communications that are allowed, including:

- Asking an appraiser to consider additional information about the property or about comparable properties to support a valuation
- Requesting additional detailed information be added to a valuation, or
- Requesting errors be corrected

Appraisers are paid in full regardless of the outcome of the valuation.

At time of hire, all employees/contractors will be trained in all company policies and procedures, including Appraisal Independence. Training on all policies and procedures will also be held on an annual basis. All staff are required to strictly adhere to all provisions of Appraiser Independence.

Cranbrook Loans Group, Inc. shall ensure that the borrower is provided with a copy of any appraisal report concerning the borrower's subject property promptly upon completion or no less than three days prior to the closing of the loan, at no additional costs to the borrower. The borrower may waive this three-day requirement by documenting the request in writing.

Subsequent Appraisals

Cranbrook Loans Group, Inc. will not order, obtain, use, or pay for a second or subsequent appraisal in connection with a mortgage financing transaction unless: (i) there is a reasonable basis to believe that the initial appraisal was flawed or tainted and such basis is clearly and appropriately noted in the mortgage file, or (ii) such appraisal is done pursuant to written, pre-established bona fide post-funding appraisal review or quality control processes or underwriting guidelines, and so long as Cranbrook Loans Group, Inc. adheres to a policy of selecting the most reliable appraisal, rather than the appraisal that states the highest value, or (iii) a second appraisal is required by law.

Transferring Appraisals

Cranbrook Loans Group, Inc. may permit the transferring of conventional loan appraisals from another lender; however, Cranbrook Loans Group, Inc. will require an affidavit from the appraiser and the transferring lender certifying the appraisal was prepared in compliance with Cranbrook Loans Group, Inc.'s Appraiser Independence Policy, along with the policies and procedures of the underwriting lender.

Cranbrook Loans Group, Inc. will permit the transferring of FHA loan appraisals from the lender; however, the appraisal must comply with FHA guidelines for appraisal

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

portability and the appraisal must have been ordered by an approved HUD "Full Eagle" lender. Also, a certification is required from the transferring lender, signed by an officer, and must be included in the file.

Higher-Priced Mortgage Loan (HPML) Appraisal Delivery Policy

The following Appraisal Guidelines will apply to any higher-priced, first-lien or subordinate-lien closed-end loan secured by a consumer's principal dwelling (which are not otherwise exempt under the rule).

- If the consumer is using a covered HPML to buy a flipped property (some exemptions apply), an additional appraisal will be required if the price reflected in the consumer's purchase agreement is more than the following:
    - 10% price increase if the seller acquired the property in the past 90 days.
    - 20% price increase if the seller acquired the property in the past 91 to 180 days.
- When a second appraisal is required on a property flip as defined above, Cranbrook Loans Group, Inc. will ensure that the appraisal analyzes the difference in the original sales price and the subsequent sales price, analyzes changes in market conditions, and analyzes property improvements the seller made.
- Provide a disclosure within three (3) business days of application explaining the consumer's rights regarding appraisals.

HPML Overview

The Truth in Lending Act ("TILA") of 1968 and its implementing rules under Regulation Z seek to promote the informed use of consumer credit by requiring disclosures about its costs and terms. In 2010, TILA was amended by the Dodd-Frank Wall Street Reform and Consumer Protection Act ("Dodd-Frank Act") to require rules for appraisals on principal residences securing higher-priced mortgage loans ("HPML").

Regulatory Requirements and Policy

HPML Defined:
A loan is "higher-priced" if:

- It is a first-lien mortgage (other than a jumbo loan) with an annual percentage rate (APR) that exceeds the Average Prime Offer Rate ("APOR") published by the Bureau at the time the APR is set by 1.5 percentage points or more.
- It is a first-lien jumbo loan with an APR that exceeds the APOR at the time the APR is set by 2.5 percentage points or more. A loan is a jumbo loan when the principal balance exceeds the limit in effect as of the date the transaction's rate is set for the maximum principal obligation eligible for purchase by Freddie Mac .

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- It is a subordinate-lien with an APR that exceeds the APOR at the time the APR is set by 3.5 percentage points or more.

What the Rule Requires

When originating an HPML first-lien or subordinate-lien covered by the HPML Appraisal Rule Cranbrook Loans Group, Inc. must:

- Use a licensed or certified appraiser who certifies the appraisal complies with the Uniform Standards of Professional Appraisal Practice ("USPAP") and the Financial Institutions Reform, Recovery and Enforcement Act ("FIRREA") of 1989, as amended, 12 U.S.C. 3331 et seq., and any implementing regulations.
- Have the appraiser physically visit the property and view the interior and produce a written appraisal report.
- Obtain an additional appraisal if the property's seller acquired the dwelling within the past 180 days and is reselling it for a price that exceeds certain thresholds, i.e., if the housing is being flipped.
- Provide a disclosure within three business days of application explaining the consumer's rights regarding appraisals.
- Give consumers copies of the appraisal reports (at no additional cost) performed in connection with the loan at least three days before consummation of the transaction.

Cranbrook Loans Group, Inc. currently operates as a mortgage broker and/or a non-delegated correspondent and will therefore follow lender policies and procedures with regards to HPML originations.

Overlap with Equal Credit Opportunity Act Appraisal Requirements

For first lien HPMLs that are covered by the HPML Appraisal Rule, the disclosure requirements overlap with the ECOA Valuations Rule. The ECOA Valuations Rule imposes a different deadline structure for providing copies of appraisals to consumers. Under the ECOA Valuations Rule, copies of appraisals must be provided "promptly upon completion" or three business days before closing, whichever is earlier. As opposed to, the TILA HPML Appraisal Rule, which requires delivery of the appraisal three business days before closing.

In addition, the applicant can waive the deadline under the ECOA Valuations Rule and elect to receive the copies at closing, whereas the applicant cannot waive the three-business-days-before-closing deadline under the HPML Appraisal Rule.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Because transactions may be subject to both requirements, it is the policy of Cranbrook Loans Group, Inc. to always provide appraisals to borrower's "promptly upon completion." Additionally, Cranbrook Loans Group, Inc. will not allow borrowers to waive the three-business-day-appraisal-delivery requirement when a loan is an HPML.

Regulatory Text Requirement

Cranbrook Loans Group, Inc. appraisal disclosure shall include the following language to comply with the TILA HPML Appraisal Rule and the ECOA Appraisal Rule:

"We may order an appraisal to determine the property's value and charge you for this appraisal. We will promptly give you a copy of any appraisal, even if your loan does not close. You can pay for an additional appraisal for your own use at your own cost."

Safe Harbor

Appendix N to Regulation Z details the steps necessary to fully comply with HPML Appraisal Rule. It is the policy of Cranbrook Loans Group, Inc. to comply with the steps detailed in Appendix N when requiring an appraisal.

Safe Harbor Steps

1. Ordering the appraisal:
   - Cranbrook Loans Group, Inc. only orders appraisals from certified or licensed appraisers in the state where the property is located. Cranbrook Loans Group, Inc. requires all appraisers to follow USPAP and Title XI of FIRREA and any implementing regulations in effect at the time the appraiser signs the appraiser's certification.

2. Appraisal Requirements:
   - identifies the creditor who ordered the appraisal, the property and the interest being appraised
   - Indicates whether the appraiser analyzed the contract price.
   - Addresses conditions in the property's neighborhood
   - Addresses the condition of the property and any improvements to the property.
   - Indicates which valuation approaches the appraiser used and includes a reconciliation if the appraiser used more than one valuation approach.
   - Provides an opinion of the property's market value and an effective date for the opinion.
   - Indicates that the appraiser performed a physical property visit of the interior of the property, as applicable.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Includes a certification signed by the appraiser that the appraisal was prepared in accordance with the requirements of USPAP and Title XI of FIRREA and any implementing regulations.

3. Checking the status of the appraiser:
   - Cranbrook Loans Group, Inc. uses the National Registry to verify that all appraisers utilized in the appraisal process are certified or licensed in the state where the property is located on the date he/she signed the appraiser's certification.

4. Knowledge of Incorrect Facts or Certifications:
   - If Cranbrook Loans Group, Inc., or any of its employees/contractors, are aware of facts that are contrary to the facts or certifications contained in the appraisal, Cranbrook Loans Group, Inc. will notify the appraiser of those facts and ask for the affected facts or certifications to be corrected. If Cranbrook Loans Group, Inc. believes that fraud has occurred, Cranbrook Loans Group, Inc. will prohibit the use of the appraisal, order a new appraisal from a new appraisal company, and investigate and report any fraudulent activity discovered to the appropriate authorities, including the CFPB and state appraisal board.

Exemptions to the second appraisal property flip policy

If the subject property is being purchased from:

- A local, state, or federal government agency.
- A person who acquired title on the property via foreclosure, deed-in-lieu of foreclosure, or other similar judicial or non-judicial procedure through that person's exercise of rights as the holder of a defaulted loan.
- A nonprofit entity as part of a local, state, or federal government program that lets nonprofits acquire title to single family properties for resale from a seller who itself acquired title to the property through foreclosure, deed-in-lieu of foreclosure, or other similar judicial or non-judicial procedure.
- A person who inherited the property or acquired it through a court ordered dissolution of marriage, civil union, or domestic partnership, or through the partition of the seller's joint or marital assets.
- An employer or relocation agency in connection with an employee relocation.
- A service member, as defined in 50 U.S.C. appendix 511(1), who received a deployment or permanent change of station order after purchasing the property.

If the subject property is located in a presidentially declared disaster area during any time period during which the federal financial institutions regulatory agencies waive the requirements in Title XI of FIRREA or the property is located in a rural or underserved county. (Counties located in the U.S. Department of Agriculture's Economic Research Service Urban Influence Codes 4,6,7,8,9,10,11,12)

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Unsatisfactory Appraisers

High Risk Appraiser is defined as an appraiser who knowingly does not report and/or withholds any issues that could negatively affect value or marketability. This may be determined through underwriting, Quality Control, or investor audits.

Any appraiser that falls into a high-risk category will be reported to the Appraiser Management within the company.

Quality Control and Appraisal Review

All QC reviews are completed by an independent Quality Control company and 10% of the appraisals reviewed within the sample are sent out for a Field Review by an independent appraiser. Any file found to reflect an issue related to the ordering process or reflect a valuation issue must be brought to the attention of management.

If we have a reasonable basis to believe an appraiser or appraisal management company is violating applicable laws, or is otherwise engaging in unethical conduct, shall promptly refer the matter to the applicable State appraiser certifying and licensing agency or other relevant regulatory bodies.

TILA/RESPA Integrated Disclosure Rule (TRID)

Applies to most closed-end consumer mortgage loans (including construction only, 25+ acres, second homes, lot loans).

Pre-Disclosure Activities

Imposition of Fees

§1026.19l(2)(i) prohibits collecting any fee from a consumer prior to providing disclosures and the consumer expressing an intent to proceed, other than a reasonable fee for a credit report.

Fees Procedures

Cranbrook Loans Group, Inc. will not charge a consumer anything other than a bona fide and reasonable fee for obtaining the consumer's credit report before the consumer has received the required disclosure (Loan Estimate) and indicating their intent to proceed.

Written Information Provided

§1026.19(e)(2)(ii) requires creditors who provide consumers with a written estimate of terms or costs specific to that consumer before receipt of the Loan Estimate to clearly and conspicuously state at the top of the front of the first page of the estimate in a font

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

size that is no smaller than 12-point font: "Your actual rate, payment, and costs could be higher. Get an official Loan Estimate before choosing a loan."

Written Information Procedures

Cranbrook Loans Group, Inc. will include the required disclosure in the appropriate format (that is not substantially similar to the Loan Estimate) on any written estimate of terms or costs specific to a particular consumer.

Loan Estimate (LE)

Replaces the Good Faith Estimate and the Truth in Lending Disclosure. Also includes RESPA's Servicing Disclosure and the ECOA Right to an Appraisal.

Requirements of Loan Estimate (LE):

- Provide the initial LE within three business (3) days of application.
- Provide the initial LE seven business (7) days prior to consummation.
- Borrower receives LE within three business (3) days of being sent.
- Provide revised LE within three business (3) days of Change of Circumstance.
- Provide revised LE for float to lock within three (3) business days.
- Borrower must receive revised LE four (4) days prior to consummation.
- LE may not be issued once the Closing Disclosure (CD) has been issued.

Once the sixth piece of required data is received from the borrower(s), the file is uploaded to a credit lender of choice and the disclosure process is initiated to ensure that disclosures are delivered to the borrower(s) within the regulatory timeline. Although credit lenders may have slightly different processes for generating and delivering the disclosures to the borrower, our process remains largely the same. Loan and borrower specific data is uploaded to the credit lender's website, along with the fees and property related expenses. Once this process is complete, the credit lender delivers the Loan Estimate and the other required early disclosure to the borrower(s).

If Cranbrook Loans Group, Inc. is concerned that the credit lender may not meet the regulatory timeline for delivery, the Cranbrook Loans Group, Inc. will develop and deliver the Loan Estimate to the borrower directly to ensure it is received within the required timeframe. If Cranbrook Loans Group, Inc. fails to upload required data to a credit lender of choice within three (3) business days from application, Cranbrook Loans Group, Inc. will provide the Loan Estimate along with all required three-day disclosures.

When a Changed Circumstance occurs, Cranbrook Loans Group, Inc. will notify the credit lender of the changed and/or new information and request new disclosures be delivered to the borrower(s) within the regulatory timeframe. Similar to the initial disclosure process, the revised disclosure process requires notifying the credit lender of the specifics of the change, as well as any fees, charges, or other loan terms that are

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

affected by the change. Upon review and concurrence, the credit lender delivers the redisclosed Loan Estimate to the borrower(s).

Closing Disclosure (CD)

- Borrower must receive CD three (3) business days prior to consummation.
- A revised CD requiring a new three (3) day waiting occurs if the APR exceeds the tolerance threshold, the loan program changes, or a prepayment penalty is added to the loan.
- Post-consummation changes due to numeric errors must be re-disclosed no later than thirty (30) days after consummation.
- Post Consummation changes due to non-numeric clerical errors must be re-disclosed no later than sixty (60) days after consummation.
- Refunds due to the consumer must be refunded (and corrected disclosures provided) no later than sixty (60) days after consummation.

Closings are scheduled through the credit lender, and although credit lenders may have slightly different processes for generating and delivering the disclosures to the borrower, our process remains largely the same. Closing information and loan specific data is uploaded to the credit lender's website. Once this process is complete, the credit lender delivers the Closing Disclosure to the borrower(s) in accordance with the required time frames.

Determination of Closing Costs

In general, an estimated closing cost under §1026.19(e)(3) is in good faith if the charge paid by or imposed on the consumer does not exceed the amount originally disclosed.

For the purposes of determining good faith, a creditor may use a revised estimate of a charge instead of the estimate originally disclosed if the revision is due to any of the following reasons:

1. Changed circumstance affecting settlement charges, such as:
    a. An extraordinary event beyond the control of any interested party or other unexpected event specific to the consumer or transaction.
    b. Information specific to the consumer or transaction that the creditor relied upon when providing the disclosure and that was inaccurate or changed after the disclosures were provided.
2. New information specific to the consumer or transaction that the creditor did not rely on when providing the original disclosures.
3. If the consumer is ineligible for an estimated charge previously disclosed because a changed circumstance affected the consumer's creditworthiness or the value of the security for the loan.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

4. If the consumer requests credit terms or the settlement that causes an estimated charge to increase.
5. If the points or lender credits change because the interest rate was not locked when the disclosures were provided.
6. If the consumer indicates an intent to proceed with the transaction more than ten business days (or longer if the consumer was given longer than ten days to indicate their intent to proceed).
7. In transactions involving new construction, where the creditor reasonably expects that settlement will occur more than 60 days after the disclosures are provided, the creditor may provide revised disclosures to the consumer if the original disclosures state clearly and conspicuously that at any time prior to 60 days before consummation, the creditor may issue revised disclosures.

Cranbrook Loans Group, Inc. will examine the facts of each change in closing costs and communicate with the creditor to document compliance including documentation showing the original estimate of the cost, explaining the reason for the revision and how it affected settlement costs, show that the revised disclosure reflecting the increase was provided to the consumer in compliance with all timing requirements per §1026.19(e)(3)(iv).

Rescission

Applies to: Refinance transactions, including rate and term adjustments, home equity loans, and HELOCs.

In a credit transaction in which a security interest is (or will be) retained or acquired on a consumer's principal dwelling, each consumer whose ownership interest is (or will be) subject to the security interest will have the right to rescind the transaction.

To exercise the right to rescind, the consumer will notify the creditor of the rescission by mail, telegram, or other means of written communication. Notice is considered given when mailed, when filed for telegraphic transmission or, if sent by other means, when delivered to the creditor's designated place of business. The consumer may exercise the right to rescind until midnight of the third business day following loan closing (assuming the Notice of Right to Rescind was provided at closing).

Procedure

Cranbrook Loans Group, Inc. is a mortgage broker/non-delegated correspondent company and, as such, relies upon the credit lender to generate and deliver the Notice of Right to Rescind. If a consumer chooses to rescind a refinance transaction within the

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

allowable three (3) business days, they will receive a *refund of all monies paid in advance including appraisal and credit report.*

Mortgage Loan Originator Compensation

Cranbrook Loans Group, Inc. is a Loan Originator Organization, as defined in Regulation Z. As such the compensation the organization receives is subject to the regulation, as well as the compensation it pays to its MLOs. Section 1026.36(d) of Regulation Z prohibits compensation that is based on the terms or conditions of a mortgage loan, or a proxy for a term of the loan. This, and other provisions, apply to closed-end consumer credit transactions secured by a dwelling. This includes closed-end junior lien loans and chattel mortgages.

A "term of a transaction" is any right or obligation of the parties to a credit transaction. The amount of credit extended is not a term of a transaction or a proxy for a term of a transaction, if the compensation received by, or paid to, a loan originator, directly or indirectly, is based on a fixed percentage of the amount of credit extended; however, such compensation may be subject to a minimum or maximum dollar amount.

Regulation Z prohibits loan originators from being compensated by both the lender and the consumer in the same transaction. It also prohibits steering a consumer into a transaction based upon the fact that the loan originator will receive greater compensation, unless the transaction is in the consumer's interest.

Payments to the Organization

To ensure our compliance, Cranbrook Loans Group, Inc. will be paid by either the funding lender or the borrower, but not both. Lender-paid compensation will be evidence by retaining the compensation agreement in place at the time the rate was set, a copy of the Closing Disclosure, and either a copy of the check received or wire from closing.

Borrower paid compensation will be evidenced by retaining the Loan Estimate(s), Closing Disclosure, and either a copy of the check received or wire from closing. Change of circumstance documentation, as applicable, and daily rate sheets may also be retained as part of the loan file to evidence the compensation was paid in compliance with the Regulation.

If state law requires the broker to provide an agreement or disclosure to the borrower, that include the total amount of the compensation the company will receive, this disclosure can serve as evidence of the amount of compensation received by the company, unless the amount paid to the company has varied from the amount disclosed.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Payments to the Individual

MLO Compensation will be paid in accordance with the written agreement that was in effect at the time the rate was set. MLOs will not be allowed to adjust their compensation more than once per quarter. Cranbrook Loans Group, Inc. will retain a copy of the written agreement and evidence of payment to the MLO. If an MLO is compensated on a per-transaction basis, the payment will be evidenced by a copy of the paycheck and/or additional records that provide a breakdown of the total commission paid on the check. Other compensation methods must be supported with documentation to show the payments are in compliance with the regulation.

Additional Compensation Information

The only time loan originators may decrease their compensation is to defray the cost of certain unforeseen increases in settlement costs. This exception is very narrow and does not permit a reduction in compensation to bear the cost of a pricing concession to match a competitor's pricing, or to avoid high-cost mortgage provisions. Loan originators can use borrower-paid compensation to provide a competitive edge, as this method of compensation is negotiated between the consumer and the loan originator organization. However, this should be agreed upon prior to the Loan Estimate being provided, because once the compensation amount is disclosed, it cannot change.

Cranbrook Loans Group, Inc. may allow the MLO to negotiate lower origination charges for family or friends. Approval must be granted by Senior Management in advance of loan disclosures being generated and adhere to company policy.

All employee/contractor loans must be approved in advance by Cranbrook Loans Group, Inc. and will follow standard employee/contractor pricing guidelines.

Copies of compensation agreements with lenders and MLOs, as well as records of all compensation received and paid out with be retained for three years after the date the payment was made or received.

Anti-Steering Rule

Regulation Z states that a Mortgage Loan Originator will not direct or "steer" a consumer to consummate a transaction based upon the originator will receiving greater compensation from the creditor in that transaction than in other transactions the originator offered or could have offered to the consumer unless the consummated transaction is in the consumer's interest. In determining whether a consummated transaction is in the consumer's interest, that transaction must be compared to other possible loan offers available through the originator, if any, and for which the consumer was likely to qualify.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

To satisfy this requirement, we will present options for each type of transaction in which a borrower expresses an interest; transaction types include fixed-rate mortgages, adjustable-rate mortgage, and reverse mortgage. We will present loan options that include:

- The lowest interest rate;
- The lowest dollar amount for origination/discount points or fees; and
- The lowest interest rate with no risky features such as prepayment penalty, interest only, negative amortization, or balloon payment within the first seven years.

To evidence compliance, the options presented will be in writing on the anti-steering disclosure and retained in the loan file.

Additional Required Disclosures

Additional documents/disclosures required under TILA/Reg. Z that must be provided to the consumer include the following:

- The Home Loan Toolkit is required for all purchase transactions. (Note: State law may require Home Loan Toolkit on both purchase and refinance transactions).
- A Written Service Provider List is required if the creditor permits a consumer to shop for a required settlement service.
- Consumer Handbook on Adjustable-Rate Mortgages (CHARM Booklet) for variable rate mortgages
- Variable Rate Disclosure for variable rate mortgages
- WHAT YOU SHOULD KNOW ABOUT Home Equity Lines of Credit (HELOC) (if applicable).
- HELOC Disclosure for Home Equity Lines of Credit

Cranbrook Loans Group, Inc. is a mortgage broker company and generally the underwriting credit lender provides the disclosures required by the Truth in Lending Act. It is Cranbrook Loans Group, Inc.'s responsibility to provide the application and information to the credit lender in a timely fashion to facilitate the credit lender's disclosure.

If the required disclosures/handbooks are not provided to the consumer by the credit lender, it is the responsibility of the broker to provide them to the consumer within three (3) business days of the consumer's loan application.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Ability to Repay

Overview

In the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), Congress adopted ability-to-repay (ATR) requirements for virtually all closed-end residential mortgage loans. Congress also established a presumption of compliance with the ATR requirements for certain categories of mortgages, called Qualified Mortgages (QMs). These requirements have been codified in Section 1026.43 of Regulation Z.

Exempt Transactions

While Section 1026.43 applies to any consumer credit transaction secured by a dwelling, the following are excluded from the ATR requirements:

- HELOCs
- Timeshares
- Temporary/Bridge Loans with a term of 12 months or less
- Construction period of 12 months or less including construction phase of Construction Perm loan
- Reverse Mortgages
- Extension of credit made under a Housing Finance Authority program.

Cranbrook Loans Group, Inc. will not structure a loan as an open-end plan to evade the requirements of ATR. §1026.43(h)

Cranbrook Loans Group, Inc. is a mortgage broker company and as such does not make credit decisions on our loans, but for any consumer credit transaction secured by a dwelling, Cranbrook Loans Group, Inc. must ensure that the borrower has the ability to repay the transaction. Depending upon the credit lender on the transaction, Cranbrook Loans Group, Inc. will follow the requirements for either an ATR or QM mortgage, noting that loans eligible for sale to Fannie Mae and Freddie Mac must be a Qualified Mortgage.

General ATR Requirements

Cranbrook Loans Group, Inc. will:

- Consider all current or reasonably expected income or assets other than the value of the dwelling, including any real property attached to the dwelling, that secures the loan §1026.43(c)(2)(i)

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Consider employment status §1026.43(c)(2)(ii)
- Consider the monthly mortgage payment (calculated per the rule) §1026.43(c)(2)(iii)
- Consider the monthly mortgage payment on any simultaneous loan(s) §1026.43(c)(2)(iv)
- Consider the consumer's credit history §1026.43(c)(2)(viii)
- Consider the consumer's debt to income ratio or residual income §1026.43(c)(2)(vii)
- Consider the consumer's current debt obligations, including alimony and child support §1026.43(c)(2)(vi)
- Consider the monthly payment for all mortgage related obligations §1026.43(c)(2)(v)

General QM Requirements

Cranbrook Loans Group, Inc. will:

- Consider all current or reasonably expected income or assets other than the value of the dwelling (including any real property attached to the dwelling) that secures the loan §1026.43(e)(2)(v)(A)
- Consider the consumer's current debt obligations, including alimony and child support §1026.43(e)(2)(v)(A)
- Consider the consumer's debt to income ratio (using the highest rate in the first five years) or residual income §1026.43(e)(2)(v)(A)
  Verify the consumer's current or reasonably expected income §1026.43(e)(2)(v)(B)
- Verify the consumer's current debt obligations including alimony and child support §1026.43(e)(2)(v)(B)
- Ensure that the transaction's total points and fees do not exceed the allowable thresholds §1026.43(e)(3)
- Ensure that the loan's annual percentage rate does not exceed the average prime offer rate for a comparable transaction as of the date the interest rate is set §1026.43(e)(2)

Loans insured by the Federal Housing Administration (FHA), guaranteed by the USDA or by the US Department of Veterans Affairs, or loans originated by or for, or approved for purchase by any state Housing Finance Agency (HFA) have a presumption of compliance with the Qualified Mortgage requirements. Cranbrook Loans Group, Inc. will work with the consumers and credit lender to ensure that these loans originated in accordance with Agency requirements.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Procedures

Origination

- Loan Qualification/Pre-Qualification Process - we qualify all borrowers based on their ability to repay.
- Complete Application Process - identifies ALL potential documentation needed to substantiate a borrower's ability to repay.
- Borrower Checklist of Required Documentation - Allows the borrower to identify all documentation required for qualification and verification of ability to repay.
- Points and Fees - identifies our points and fees structures for the purposes of calculating maximum allowable fees.

Processing

- Pre-Underwriting Review Process - loan processing is the second stage of loan level ability to repay evaluation. Processing reviews the file to ensure all documentation to substantiate the borrower's ability to repay is included in the loan file prior to underwriting evaluation. Items identified as missing, or incomplete are forwarded to the borrower and credit lender staff prior to proceeding.
- In general, the credit lender will perform verifications, but for any verifications Cranbrook Loans Group, Inc. performs Cranbrook Loans Group, Inc. will verify any information that we/the credit lender relies on in determining a consumer's repayment ability using reasonably reliable third-party records. §1026.43(c)(3); §1026.43(e)(2)(v)

Debt to Income Ratios

- The Debt-to-Income Ratio (DTI) will be calculated for all ATR loans based on the fully indexed rate or any introductory interest rate, whichever is greater, and monthly, fully amortizing payments that are substantially equal. §1026.43(c)(5)

- The Debt-to-Income Ratio (DTI) will be calculated for all QM loans based on the maximum interest rate that may apply during the first five years, and periodic payments of principal and interest. §1026.43(e)(iv)

Changed Circumstances

If a borrower's ability to repay changes, based on updated and revised information, the loan will be re-evaluated to ensure the borrower is still able to maintain the ability to repay.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

USA Patriot Act

Overview

Section 326 of the USA Patriot Act requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account or changes an existing account. This federal requirement applies to all new customers and current customers and requires customers (after being given reasonable notice) to comply with reasonable procedures for verifying their identity. This information is used to assist the United States Government in the fight against the funding of terrorism and money-laundering activities.

Procedures

The Mortgage Loan Originator will be responsible for obtaining valid identification from all borrowers as well as completing the appropriate Patriot Act Disclosure detailing the information that was obtained.

Disclosure Timing Requirements

The most important aspect of the mortgage application process is to ensure that all compliance requirements have been met. To comply with State and Federal Law, the following must be always followed:

ARM Disclosure

Must be provided within three business days of initial application for all adjustable-rate mortgages.

Borrower's Authorization/Credit Authorization

Must be generated the day of initial application for a face-to-face interview or within three business (3) days of initial application if other than a face-to-face application. This authorization must be executed by the consumer(s) prior to requesting information from an outside third party. (i.e., credit report, appraisal, etc.)

Consumer Handbook on Adjustable-Rate Mortgages ("CHARM") Booklet

Must be provided within three business days of initial application for all adjustable-rate mortgages.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Credit Score Disclosure or FACT Act Notice to Consumers

If the creditor or mortgage broker has obtained the consumer's credit score in relation to their application, then this disclosure must be provided as soon as reasonably practicable. Commonly referred to as Notice to Home Loan Consumer, this disclosure is found at the end of a consumer's credit report, typically included with the initial application disclosure package and provided within three business days of application. Mortgage brokers have a duty to provide the disclosure even if the loan does not close. Some companies can pay more for a credit report and the report provider will send the disclosure to the consumer automatically. Retaining a copy of the agreement for this service would suffice as evidence of delivery. Brokers that are providing the disclosure themselves will want to retain evidence that the disclosure was provided, such as a copy of an email or E-Sign tracking records.

ECOA Notice

Must be generated the day of initial application for a face-to-face interview or within three (3) business days of initial application if other than a face-to-face application. If disclosure is mailed, a fully executed disclosure must be received prior to loan submission.

E-Sign/E-Consent Disclosure

Applicable if initial disclosures are sent electronically. The consumer must consent to the use of electronic signatures and this consent must reasonably demonstrate that the consumer can access the information being provided electronically. This disclosure is usually embedded within the E-Sign platform.

Initial Loan Estimate (LE)

For loan subject to TRID, the LE must be provided to the consumer within three (3) business days of application. No fees, except a bona fide and reasonable fee for obtaining a credit report, may be collected until the consumer has received the Loan Estimate and expressed an intent to proceed with the transaction. *(Exceptions: Home Equity Lines of Credit, Mobile Homes, Dwellings not permanently affixed to land, and Business/Commercial/Agricultural properties).*

List of HUD-Approved Homeownership Counselors

Must be provided within three days of initial application and disclose at least 10 HUD approved homeownership counselors located within close proximity to the consumer's current address. This list is pulled based on the zip code.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Net Tangible Benefit Worksheet

In connection with a refinance transaction, a reasonable inquiry must be made to determine the benefit the borrower will obtain from the refinance. Providing a properly completed Net Tangible Benefit Worksheet that is **signed and dated by the MLO and borrower** will help evidence the inquiry occurred. All worksheets should be completed, leaving no blank spaces. Key information that should be noted on the form includes:

- Borrower Name
- Subject Property Address
- Benefit from Refinance
- MLO name,
- MLO's employer,
- MLO's license number,
- MLO's business address,
- MLO's phone number, and
- MLO's email address.

Plus, the same contact information for the lender, and/or mortgage broker if one was used during the transaction. It is also important to note that some states and loan programs have additional requirements that we may need to comply with on refinance transactions.

Privacy Notice (Regulation P)

To be generated the day of initial application for a face-to-face interview or within three (3) business days of initial application if other than a face-to-face application. If disclosure is mailed, a fully executed disclosure must be received prior to loan submission. If the Privacy Notice provided to the consumer by the credit lender is not in Cranbrook Loans Group, Inc.'s name, Cranbrook Loans Group, Inc. will provide the consumer with a Privacy Notice.

Risk Based Pricing Notice

Must be provided when the credit score of the consumer is used in setting the material terms of credit. The use of the credit score does not have to be the sole or primary factor in setting the terms of credit. If a lender relied on a credit score in making a lending decision about the consumer, a Risk Based Pricing Notice is required. In a transaction involving more than one consumer, a risk-based pricing notice must be provided to each borrower. Note: If a Risk Based Pricing Notice is provided to the consumer, the FACT Act Notice to Consumers is not required.

Uniform Residential Loan Application (URLA)

Must be generated the day of initial application for a face-to-face interview.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

If other than a face-to-face interview, the URLA must be provided to the borrower within three (3) days of initial application.

Cranbrook Loans Group, Inc. has generally adopted the Truth in Lending Integrated Disclosure Rule definition of an application. Specifically, "An application means the submission of a consumer's financial information for the purposes of obtaining an extension of credit. For transactions subject to §1026.19 (e), (f), or (g), an application consists of the receipt (either written or verbal) of the following six pieces of information:

- The full name
- The property address.
- The consumer's income.
- The consumer's social security number to obtain a credit report.
- An estimate of the value of the property.
- The mortgage loan amount sought.

In addition, all applications must include the MLO's name and NMLS ID number and the company's name and NMLS ID number. In addition, the MLO should sign and date the document at the time the application is received.

USA Patriot Act Disclosure

Section 326 of the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act (USA Patriot Act) requires financial institutions to maintain a customer identification program (CIP), including using multiple documents to verify customers' identity. 31 CFR §1020.220 (5) requires procedures for providing customers with adequate notice that information is required to verify their identities. Notice is adequate if the financial institution generally describes the identification requirements and provides the notice prior to account opening. An executed copy will be retained in each loan file.

Sample language contained in the rule can be used to provide notice:

Important Information About Procedures for Opening a New Account

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account.

What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We may also ask to see your driver's license or other identifying documents.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

WHAT YOU SHOULD KNOW ABOUT Home Equity Lines of Credit (HELOC) Booklet

Must be provided within three business days of initial application for all open-ended credit lines.

Written List of Service Providers

Must be provided to the consumer within three business days if the creditor permits the consumer to shop for any required service. The services on the list must correspond to the services on the LE.

Your Home Loan Toolkit

Must be provided within three days of initial application for all one-to-four family residential properties for purchase transactions. State law may require this document to be provided on both purchase and refinance transactions.

Loan Lock Policy

Purpose

The purpose of the Lock Policy is to provide a framework that allows Cranbrook Loans Group, Inc. to generate income through the origination of mortgage loans, while minimizing interest rate risk.

Our investors/credit lenders analyze Cranbrook Loans Group, Inc. delivery performance when determining price structure, and we make every effort to obtain the best pricing available for our customers. Factors that our investors/credit lenders analyze include locked loan pull-through, locked loan fallout, and the overall quality and volume of loans delivered.

General Responsibilities

It is the responsibility of all employees involved in origination activities to understand and comply with the Lock Policy.

It is the responsibility of Management to ensure that all team members understand the policy and the impact their activities can have on loan profitability and customer satisfaction.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

MLO Responsibilities

The loan file will need to have a complete loan application with property address prior to locking.

Any loan must be locked "Best Efforts".

"Quote and Float" is prohibited. If a customer chooses to lock their interest rate, the MLO **must** lock the loan. Violations of this policy will result in disciplinary action.

15, 30, 45, and 60 day locks are available. Extended locks may be available and may have upfront costs associated with them. The lock period chosen must accommodate the right-of-rescission period for refinances. All loans must close and be disbursed by the lock expiration date.

Once a loan is locked, it is the responsibility of the MLO to confirm the lock with the investor/credit lender. MLOs must review all lock confirmations immediately upon receipt and communicate any errors to the investor/credit lender the same business day.

Lock Confirmations

It Is the policy of Cranbrook Loans Group, Inc. to deliver a Rate Lock Confirmation to the borrower(s) on each transaction.
Cranbrook Loans Group, Inc. will deliver to the client a Rate Lock Confirmation detailing the interest rate and the expiration date of that lock within 3 business days of the lock-in date. Cranbrook Loans Group, Inc. will retain a copy of the Rate Lock Confirmation in the client file.

Lock Extensions

In the event a loan cannot close within the lock period, an extension must be requested of the investor/credit lender.

Switching Investors

Investors/credit lender changes must be approved by Senior Management.

MLO Compensation

Loan Originator compensation will be paid based upon the Compensation Agreement in effect at the time of the rate lock.

Cranbrook Loans Group, Inc. will maintain Compensation Agreements with all investors/credit lenders and will retain evidence of monies received from investor/credit lenders and monies paid to the loan originator for a minimum of three (3) years.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

No MLO will be compensated based upon the terms and conditions of a transaction other than the amount of credit extended. No MLO will be compensated by any person or entity other than the consumer in a transaction where the consumer pays the MLO directly.

The only circumstance whereby an MLO may decrease their compensation is to defray the cost of certain unforeseen increases in settlement costs. This exception is very narrow and does not permit the MLO to reduce their compensation to bear the cost of a pricing concession to match a competitor's pricing or to avoid high-cost mortgage provisions.

Anti-Steering

MLOs will not 'steer' a borrower to a transaction based upon the fact that the originator will receive greater compensation in that transaction than in other transactions offered or could be offered to the customer unless the transaction is in the customer's best interest.

To satisfy the Anti-Steering Rule, for each type of transaction in which the customers express an interest in, we will present three options: These three options are:

- The lowest interest rate
- The lowest dollar amount for origination/discount points or fees
- The lowest interest rate without negative amortization, a prepayment penalty, a balloon payment in the first seven (7) years of the life of the loan, a demand feature, shared equity, or shared appreciation

Any questions about the loan lock policy should be directed to the employee/contractor's immediate supervisor.

Anti-Money Laundering Policy

The senior management team of Cranbrook Loans Group, Inc. is committed to combating money laundering. This includes actively preventing money laundering and any activity that facilitates money laundering, or the funding of terrorist or criminal activities. Accordingly, Cranbrook Loans Group, Inc. complies with all applicable requirements under the Bank Secrecy Act (BSA) and its implementing regulations. Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origin of criminally derived proceeds so that the unlawful proceeds appear to have derived from legitimate origins or constitute legitimate assets. Terrorist financing may not involve the proceeds of criminal conduct, but rather an attempt to conceal the origin or intended use of the funds, which will later be used for criminal purposes.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Definitions

Financial Crimes Enforcement Network ("FinCEN") - A Bureau of the United States Treasury Department charged with implementing and enforcing AML and SAR Rules.

Suspicious Activity Report ("SAR") - A report to be filed electronically with FinCEN when a company detects suspicious activity.

AML Compliance Director Designation and Duties

Cranbrook Loans Group, Inc. designates Michael Ayoub as the Anti-Money Laundering Program Compliance Director (AML Compliance Director), with full responsibility for Cranbrook Loans Group, Inc.'s Anti-Money Laundering (AML) Program. The AML Compliance Director is qualified through experience, knowledge, and training to oversee the program. The duties of the AML Compliance Director will include ensuring that an AML audit is performed, at a minimum, on an annual basis, by an independent outside party, and to ensure that all employees/contractors receive AML training. New employees/contractors will receive AML training within 10 days of hire and annually every year thereafter. The AML Compliance Director will also ensure that proper AML records are kept.

AML Audit - Independent Testing

The AML Compliance Director will ensure that an annual AML audit, conducted by an independent party, reviews, at minimum, the following:

- A full review of Cranbrook Loans Group, Inc.'s AML compliance program manual
- Testing of Cranbrook Loans Group, Inc.'s AML policy and procedures
- Customer Identification Procedure (CIP) review
- Transactional testing and evaluation
- OFAC checks
- FinCEN related filings review
- Evaluation of AML training
- Evaluation of automated monitoring systems and management information systems
- Review of past audit reports to assess the efficacy of recommended implemented changes.

The results of independent review will be shared with Senior Management and used to improve our AML policy and our staff's compliance with it.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Circumstances for Filing a SAR

Among the information we will use to determine whether to file a SAR are exception reports that include transaction size, location, type, number, and nature of the activity. When warranted, the AML Compliance Director will ensure SARs are filed electronically with the Financial Crimes Enforcement Network (FinCEN). The address to obtain a FinCEN filing ID and submit a SAR report is: https://bsaefiling.fincen.gov/PublicAccess

We will electronically file a SAR for any activity where we know, suspect, or have reason to suspect. The report will be filed electronically through the FinCEN BSA E-Filing System. We will not base our decision on whether to file a SAR solely on whether the transaction falls above a set threshold. We will file a SAR and notify law enforcement of all transactions that raise an identifiable suspicion of criminal, terrorist, or corrupt activities. In high-risk situations, we will notify the appropriate government agency immediately and will file a SAR with FinCEN.

SARs will be filed no later than 30 calendar days after the date of the initial detection of the facts that constitute a basis for filing a SAR. If no suspect is identified on the date of initial detection, we may delay filing the SAR for an additional 30 calendar days pending identification of a suspect, but in no case will the reporting be delayed more than 60 calendar days after the date of initial detection. All supporting documentation used in making the decision to file a SAR Report will be retained for a minimum of five years. Cranbrook Loans Group, Inc. will segregate SAR filings and copies of supporting documentation from other company books and records to avoid disclosing SAR filings.

Sharing of Information/Confidentiality

Suspect Notification

Notifying a suspect of a SAR is prohibited by Federal Law. Under no circumstances will any director, employee/contractor or appointed agent disclose or discuss an AML concern, investigation, notice or SAR filing with the person or persons subject of such, or any other person, including members of the director's, employees, or appointed agent's family. All staff are made aware that a reported transaction is confidential and investigation results will not be disclosed or discussed with anyone now or at any time in the future.

Other Requests

Cranbrook Loans Group, Inc. directors, officers, and employees/contractors, if subpoenaed or otherwise requested to disclose a SAR, or any information that would reveal the existence of a SAR, will decline to produce the SAR, or any information relating to the subject SAR, and immediately inform the AML Compliance Director. If such a request is made, Cranbrook Loans Group, Inc. will notify FinCEN. Our AML Compliance Director will handle all subpoenas or other requests for SARs.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

In addition, the AML Compliance Director will be responsible for responding to any FinCEN requests for Cranbrook Loans Group, Inc. to search its records to determine whether Cranbrook Loans Group, Inc. took an application or originated a mortgage loan for any individuals name in the FinCEN request. When requested by FinCEN, Cranbrook Loans Group, Inc. shall provide FinCEN with the name, title, mailing address, e-mail address, telephone number, and facsimile number of the AML Compliance Director.

The AML Compliance Director will search our records and respond if an account is located, providing to FinCEN the following information:

- The name of the individual, entity, or organization that submitted an application or obtained a mortgage loan,
- The account number,
- The date and type of transaction, and
- Other identifying information obtained during the application process, such as social security number, date of birth, and address

The AML Compliance Director will respond in the time frame and method requested by FinCEN.

Sharing Information with other Financial Institutions

At this time, Cranbrook Loans Group, Inc. does not voluntarily share information with other financial institutions for identifying and reporting suspicious activity. Prior to sharing, or in the event of a request for information from another financial institution to share information, Cranbrook Loans Group, Inc. will provide notice of intent to share with FinCEN, as described on its website *http://www.fincen.gov*. A new notice will be provided annually. In addition, steps will be taken to ensure the other financial institution has also provided the required notice to FinCEN by reviewing the FinCEN list or confirming it directly with the financial institution.

Customer Identification Procedures

It is the policy of Cranbrook Loans Group, Inc. to verify the identity of every customer at the time of application and prior to opening the account. The following information will be collected from the consumer prior to opening the account. Cranbrook Loans Group, Inc. may collect additional information as it deems necessary to aid in account administration (e.g., phone number, mailing address, etc.):

1. Name
2. Date of Birth
3. Residence and Business Street Address (individuals only). For individuals not having a physical address, an Army Post Office (APO) box, or Fleet Post Office (FPO) box may be used. However, these instances will be rare.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

4. Taxpayer Identification Number. For US individuals, this will include a Social Security Number (SSN) or Individual Taxpayer Identification Number (ITIN). For non-US individuals, this will include one or more of a taxpayer identification number, passport number and issuing country, alien identification card number, or number and issuing country of any government issued identification, which evidences residence or nationality and bears a photo or similar safeguard.

Identifying information collected from the customer will be maintained for five years after the account is closed. Verification information will be maintained for five years after the record is created. This will be achieved by maintaining copies of all documents used in the verification process, which will, at a minimum, contain the identification number, the state of the country of issuance, the date of issue (if available) and the expiration date of the document. In addition, we will retain evidence of any non-documentary methods used to verify identity and a description of how any discrepancies in identity were resolved. All documentation will be reviewed for accuracy and completeness.

Information Verification

Verification of the information provided by the customer will be conducted prior to opening the account as well as throughout the loan process. Each customer will be asked to provide, at a minimum, two documents that will assist Cranbrook Loans Group, Inc. with verifying the information provided.

The non-documentary methods that we may employ are:

1. Contacting the customer (via a thank you letter, telephone call, etc.).
2. Verification of information provided through public databases, property tax bills, utilities bills, financial references, obtaining a financial statement, etc.
3. Verifying employment.
4. Referencing a phone book or internet search for address confirmation.

Instances may arise where Cranbrook Loans Group, Inc. is not satisfied after reviewing an acceptable document that we know the true identity of the customer. At the discretion of the AML Compliance Director and the company senior management, Cranbrook Loans Group, Inc. may choose not to open the account or employ non-documentary methods for further verification as to the customer's identity.

In instances where an account is not opened face to face, employees/contractors will employ non-documentary methods to complete verification. If Cranbrook Loans Group, Inc. cannot verify the information provided, Cranbrook Loans Group, Inc. may choose to open the account or may request that the customer come into the institution to provide an acceptable document.

Mortgage Loan Originators, loan processors, and loan underwriters (if applicable) have been trained in the detection of Red Flags. Mortgage Loan Originators (MLOs) will request identifying information to complete the loan application. MLOs will review all

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

information provided at the time of application and compare this information with the application. The processing staff will review all documents received and compare these documents to previously received documentation to ensure information is consistent. The application package will also include the consumer's consent to verify social security. MLOs and processors will compare the credit report to the application. Underwriting staff (if applicable) will review the entire file for inconsistencies and will utilize fraud detection software. If discrepancies are noted between the information provided by the customer and the verification methods (documentary or non-documentary), Cranbrook Loans Group, Inc. will resolve all substantial discrepancies prior to opening the account.

If at any time Cranbrook Loans Group, Inc. suspects fraud, identity theft, potential terrorism, money laundering or any other suspicious activity, Cranbrook Loans Group, Inc. will notify the proper government authorities, and if deemed necessary, a SAR will be filed.

Cranbrook Loans Group, Inc. may at any point in collection or verification processes refuse to open the account.

Existing customers will not be exempt from these rules.

If a potential or existing customer either refuses to provide the information described above when requested, or appears to have intentionally provided misleading information, Cranbrook Loans Group, Inc. will not establish an account relationship until the required information about the individual is obtained or additional due diligence satisfied. In either case, our AML Compliance Director will be notified so that we can determine whether the situation is reportable to FinCEN.

Office of Foreign Assets Control (OFAC) Lists

The Office of Foreign Assets Control (OFAC) of the Department of the Treasury administers and oversees a series of laws that impose economic sanctions against hostile targets to further U.S. foreign policy and national security objectives. At the time an account is opened, Cranbrook Loans Group, Inc. will check to ensure that no customer appears on the Treasury's OFAC "Specifically Designated Nationals and Blocked Persons" List (SDN List), and is not from, or engaging in transactions with people or entities from embargoed countries and regions listed on the OFAC website. Because the OFAC website is updated frequently, we will consult the list on a regular basis and subscribe to receive updates when they occur. We may, if necessary, access these lists through various software programs or service providers to ensure speed and accuracy. We will also review existing accounts against these lists when they are updated, and we will document our review.

The website can be accessed at: https://sanctionssearch.ofac.treas.gov/

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

In the event we determine a customer, or someone with or for whom the customer is transacting, is on the SDN List or is engaging in transactions with a person or entity located in an embargoed country or region, we will perform additional due diligence to determine an actual or false positive match to the name on the OFAC list. If the name is determined to be a true match, appropriate actions will be taken to block (or reject) the transaction and file the appropriate report with OFAC using their online reporting system that was effective August 8, 2024: https://ofac.treasury.gov/ofac-reporting-system.

AML Risk Assessment Matrix for Accounts

The following risk assessment will be used to evaluate all applicants. Those who have a level of risk of 15 or greater will be reviewed by the AML Compliance Director prior to approval of the loan.

Risk Categories	Level of Risk
Products Offers	
Fixed Rate	Minimal = 1
Variable Rate	Average = 2
Government Insured or Guaranteed	Minimal = 1
Geographic Locations	
Primary Company Location	Minimal = 1
Branch Locations	Average = 2
No Brick and Mortar Location	Moderate = 3
Verified Funds held in a US Financial Institution	Minimal = 1
Funds held outside the USA	Moderate = 3
Customer Profile	
Prior Customer	Minimal = 1
New Customer	Moderate = 3
Business Line	
Broker	Minimal = 1
Non-delegated	Average = 2
Delegated Correspondent	Moderate = 3
Application Type	
Face-to-Face Interview	Average = 2
US Postal	Moderate = 3
Internet	Moderate = 3
Telephone	Moderate = 3

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Residency Type	
US Citizenship	Average = 2
Non-US Citizen lawfully residing in the US as a permanent resident alien	Moderate = 3
Non-US Citizen lawfully residing in the US as a non-permanent resident alien	High = 4
Identification Type	
Identification Verified	Minimal = 1
Company is unable to verify customer information	Very High = 5

Detecting Red Flags

Red flags that signal possible money laundering or terrorist financing include, but are not limited to:

Customers who Provide Insufficient or Suspicious Information

- The customer uses unusual or suspicious identification documents that cannot be readily verified.
- The customer provides an individual taxpayer identification number after having previously used a Social Security Number.
- The customer exhibits unusual concern about the company's compliance with government reporting requirements and the firm's AML policies (particularly concerning his/her identity, type of business), or is reluctant or refuses to reveal any information concerning business activities or furnishes unusual or suspicious identification or documents.
- The customer wishes to engage in a transaction that lacks business sense or is inconsistent with the customer's stated business.
- The information provided by the customer that identifies a legitimate source for funds is false, misleading, or substantially incorrect.
- Upon request, the customer refuses to identify or fails to indicate any legitimate source for his/her funds and other assets.
- The customer (or a person publicly associated with the customer) has a questionable background or is the subject of news reports indicating possible criminal, civil, or regulatory violations.
- The customer exhibits a lack of concern regarding transaction costs.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- The customer appears to be acting as an agent for an undisclosed principal, but declines or is reluctant, without legitimate commercial reasons, to provide information or is otherwise evasive regarding that person or entity.
- The customer deposits funds into several accounts, usually in amounts of less than $3,000, which are subsequently consolidated into a master account and transferred outside of the country, particularly to or through a location of specific concern (e.g., countries designated by national authorities and FATFG as non-cooperative countries and territories).
- The customer has difficulty describing the nature of his/her business.
- The customer is from, or has accounts in, a country identified as a non-cooperative country or territory by the FATF.
- The customer has financial activity with no apparent business purpose to or from a country identified as a money-laundering risk or a bank secrecy haven.
- The customer uses multiple accounts or maintains accounts in the names of family members or corporate entities, with no apparent purpose.
- The customer has inflows of funds or other assets well beyond the known income or resources of the customer.

Funds Transfers

- The customer has unexplained or sudden extensive money service activity, especially when they had little or no previous activity.
- The customer has a large number of wire transfers to unrelated third parties inconsistent with the customer's legitimate business purpose.
- Many funds' transfers are sent in large, round dollar, hundred, or thousand-dollar amounts.
- Many small, incoming transfers of funds are received, or deposits are made using checks or money orders. Almost immediately, all or most of the transfers or deposits are wired to a city or country in a manner inconsistent with the customer's business or history.
- Funds transfer activity is unexplained, repetitive, or shows unusual patterns.
- Funds transfers are sent or received from the same person to or from different accounts.
- Funds transfers contain limited content and lack related party information.

Activity inconsistent with the customer's business (if the customer holds ownership in a business entity and documentation is required to open the account)

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- The currency transaction patterns of a business show a sudden change inconsistent with normal activities.
- A large volume of cashier's checks, money orders, or funds transfers is deposited into or purchased through an account when the nature of the account holder's business would not appear to justify such activity.
- A retail business has dramatically different patterns of currency deposits from similar businesses in the same general location.
- Unusual transfers of funds occur between related accounts or among accounts that involve the same or related principals.
- Goods and services purchased by the business do not match the customer's stated line of business.
- Payments for goods or services are made by checks, money orders, or bank drafts not drawn from the account of the entity that made the purchase.

Employees/contractors

- Employee/contractor exhibits a lavish lifestyle that cannot be supported by his or her salary.
- Employee/contractor fails to conform to recognized policies, procedures, and processes.
- Employees/contractors are reluctant to take a vacation.
- Employee/contractor does not appear to be addressing red flags found in files.

Every organization, including those with the most stringent rules, is at risk of fraud. To prevent fraud from happening, we must first acknowledge that fraud exists and create awareness among the stakeholders. Please refer to the Loan Fraud Prevention section of our manual for more information on mortgage fraud, including that included in the FinCEN Advisory, FIN-2012-A009.

Responding to AML Red Flags and Suspicious Activity

When an employee/contractor of Cranbrook Loans Group, Inc. detects any red flag he/she will complete the Employee/Contractor Suspicious Activity Notification (see Exhibit A) and provide it to the AML Compliance Director. The AML Compliance Director must investigate further. This may include gathering additional information internally or from third-party sources, contacting the government, or filing a SAR.

Cash Payments Not Accepted

As part of our operating procedures, Cranbrook Loans Group, Inc. does not accept cash payments. However, the AML Compliance Director is aware that on the off chance more than $10,000 in cash, or a cashier's checks, bank drafts, or money order with a

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

face value of $10,000 or more is received, Cranbrook Loans Group, Inc. is required to file Form 8300 with FinCEN within 15 days after the cash was received. The form can be filed electronically at https://bsaefiling.fincen.gov/PublicAccess or by mail to:

Internal Revenue Service
The Rosa Parks Federal Building
PO Box 32621
Detroit, MI 48232

Training Programs

Cranbrook Loans Group, Inc. has created employee/contractor guidelines with examples of suspicious money laundering activity and lists of high-risk clients whose accounts may warrant further scrutiny. We have developed ongoing employee/contractor training under the leadership of the AML Compliance Director. Based on our size, customer base, and resources, we have determined that training will be administered by electronic means. The training will consist of:

- Guidelines with examples of suspicious money laundering activity.
- Identification of red flags and signs of money laundering that arise during the course of the employee/contractor's duties.
- Steps required when risk is identified.
- Employee/contractor and customers' roles in Cranbrook Loans Group, Inc. compliance efforts.
- Record Retention Policy.
- Disciplinary consequences for non-compliance.
- Training may also include educational pamphlets, videos, intranet systems, in-person discussions/lectures, and explanatory memos, as necessary.

Training will be completed on an annual basis for current employees/contractors. New hires will receive AML training as soon as possible in the hiring process but no later than 10 days after the date of employment.

Loan Fraud Prevention

It is the intent of Cranbrook Loans Group, Inc. to support the eradication of loan fraud within the residential lending marketplace. It is our belief that all employees and contractors, including the owners, are responsible for their actions. It is each person's responsibility to seek out, identify and report any suspicious activity or information.

The submission of a loan application containing false or misrepresented information is a federal crime.

This section has been designed to help employees/contractors proactively address the growing trends in mortgage fraud and to have a better understanding of mortgage fraud.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

The more you know and understand about mortgage fraud, the better equipped you are to do something about it and the more valuable you are to our industry. Everyone plays a significant role in the fraud prevention process. Cranbrook Loans Group, Inc. expects every employee/contractor to thoroughly review each loan file, exercise good judgment, and support Cranbrook Loans Group, Inc.'s efforts to identify suspicious activities and information.

Federal law states that those convicted of loan fraud may receive as much as a ten (10) year prison sentence and up to $1 million in fines.

Cranbrook Loans Group, Inc. has a zero-tolerance for any type of fraud. Any employee/contractor involved in fraudulent activity will be immediately terminated and any additional remedies can and will be sought against them.

Types of Mortgage Loan Fraud Identified by Law Enforcement

The following list identifies types of mortgage loan fraud, which are primarily based upon schemes and scams frequently reported or described in Suspicious Activity Reports (SARs) or identified by law enforcement and regulatory partners. This information is intended to assist Cranbrook Loans Group, Inc. in identifying when illicit activities occur in connection with mortgage loan transactions.

Occupancy fraud: Occurs when borrowers, to obtain favorable loan terms, claim that subject properties will be their primary residences instead of vacation homes or investment properties. It also occurs when subjects apply for loans for properties that others, such as family members, will occupy.

Income fraud: Includes both overstating incomes to qualify for larger mortgages and understating income to qualify for hardship concessions and modifications.

Appraisal fraud: Includes both overstating home value to obtain more money from a sale of property or cash-out refinancing, and understating home value in connection with a plan to purchase a property at a discount to market value.

Employment fraud: Includes misrepresenting whether, where, and for how long borrowers have been employed; whether borrowers are unemployed or collecting unemployment benefits; and whether borrowers are independent contractors or business owners.

Liability fraud: Occurs when borrowers fail to list significant financial liabilities, such as other mortgages, car loans, or student loans, on mortgage loan applications. Without complete liability information, lenders cannot accurately assess borrowers' ability to repay debts.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Debt elimination schemes: Involves the use of fake legal documents and alternative payment methods to argue that existing mortgage obligations are invalid or illegal, or to purport to extinguish mortgage balances. Individuals orchestrating debt elimination schemes typically charge borrowers a fee for these debt elimination "services."

Foreclosure rescue scams: Targets financially distressed homeowners with fraudulent offers of services or advice aimed at stopping or delaying the foreclosure process. Some of these scams require homeowners to transfer title - or make monthly mortgage payments - to the purported "rescuer," rather than the real holder of the mortgage. Some foreclosure rescue scams require homeowners to pay fees before receiving "services," and are known as "advance fee" schemes.

Social Security Number (SSN) Fraud and other Identify Theft: Includes the use of an SSN or other government identification card or number that belongs to someone other than the consumer in a loan application. Identity Theft includes broader use of another's identity or identifiers (beyond an SSN) to obtain a mortgage or perpetrate a "fraud for profit" scheme.

Home Equity Conversion Mortgage (HECM): Financial institutions need be aware of illegal "reverse mortgage" schemes, which targets seniors who own a home or who are coerced into taking title to a home, for the purpose of stealing or otherwise acquiring some or all the funds the senior receives from a government HECM program. HECM fraud may involve other frauds, including appraisal fraud (to increase the stated value of the home), investment fraud to acquire the HECM funds from the senior under the guise of future profits for the senior, and identify theft to acquire HECM funds without the knowledge of the senior who owns the property.

Mortgage fraud is usually committed on two distinct levels:

1. Consumer level - the person applying for the mortgage initiates and commits fraud. Such fraud is perpetrated through falsified information that the consumer alters. The most common kind of falsified information consists of changing facts on a tax return. Cranbrook Loans Group, Inc. will require tax transcripts to be obtained on agency mortgage loans when required.
2. Industry Level - the fraud at this level is committed by persons directly involved in the mortgage lending process.

More often than not, those involved in mortgage fraud have enlisted the help of others in the industry to facilitate the crime, including real estate agents, appraisers, and closing agents. By having a partner on the inside, it is easier for red flags to go unquestioned. It is important for everyone at Cranbrook Loans Group, Inc. to question the red flags, even if it involves an individual, we think we know. When times are tough, people are more apt to take risks they otherwise would not take; and mortgage fraud is a big risk.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Possible Red Flag Indicators of Mortgage Loan Fraud

The following lists of common red flags are provided to assist employees/contractors in identifying mortgage fraud. These only highlight possible instances of fraud and do not constitute a comprehensive list. No single red flag is definitive proof of such activity and may apply to multiple fraud schemes. It is important to view any red flag(s) in the context of other indicators and facts, such as the specific role of the financial institution within a mortgage loan-related transaction, as well as the institution's knowledge of any associated fraud schemes.

The presence of any of these red flags in a transaction or business arrangement may indicate a need for further due diligence and a decision whether to file a SAR. This list contains information provided by Fannie Mae, Freddie Mac, and other sources.

General Red Flags

- Same notary public and/or other "authorized representative" preparing, signing, and sending packages of nearly identical debt elimination documents for multiple borrowers with outstanding mortgage balances
- Same notary public and/or other "authorized representative" working with and/or receiving payments from unusually large numbers of borrowers
- Falsification of certified checks, cashier's checks or "non-cash item checks" drawn against a borrower/buyer's account, rather than from the account of a financial institution
- Borrower/buyer applies for a loan for a "primary residence " but does not reside in the new primary residence as indicated on the loan application; other individuals occupy the borrower/buyer's new primary residence indicating the property is being used as a secondary residence or income-generating property
- Borrower/buyer of a younger age purchases his or her "primary residence" in a senior citizen residential development
- Borrower/buyer requests refinancing for "primary residence" when public and personal documents indicate that the borrower/buyer resides somewhere other than the address on the loan application
- Language included in a short sale contract indicates the property could be resold promptly. This possibly illegal "flipping" may occur regardless of whether the Federal Housing Administration (FHA) has re-enacted or waived its arms-length resale regulations to FHA buyers
- Low appraisal values, non-arm's length relationships between short sale buyers and sellers, or previous fraudulent sale attempts in short-sale transactions.
- Agent of the buyer and/or seller in the mortgage transaction is unlicensed.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Past misrepresentations made by borrower/buyer in attempts to secure funding, property, refinance, and/or shorts sales
- Improper/incomplete file documentation, including borrower/buyer reluctance to provide more information and/or unfulfilled promises to provide more information
- Apparent resubmission of rejected loan application with key borrower/buyer details changed or modified from individual borrower to company/corporation. This activity may identify the same person attempting to secure a loan fraudulently through a straw-borrower or non-existent person
- Borrower/buyer attempts to structure currency deposits/withdrawals, or otherwise to hide or disguise the true value of assets, in order to qualify for loan modification programs intended for those homeowners in financial distress
- Request from third party affiliates on behalf of distressed homeowners to pay fees in advance of the homeowner receiving mortgage counseling, foreclosure avoidance, loan modification, or other related services
- Third party solicitation of distressed homeowners for purported mortgage counseling, foreclosure avoidance, loan modification, or other related services. These third parties may also claim to be associated with legitimate mortgage lenders, the U.S. government, or a U.S. government program
- Social security number discrepancies within the loan file
- Address discrepancies within the loan file
- Verifications completed the same day they are ordered or completed over a weekend/holiday.
- Numbers on the documentation appear to be "squeezed" due to alteration.
- Different handwriting or type styles within a document
- Excessive number of automated underwriting submissions

Application Reg Flags

- Significant or contradictory changes from handwritten to typed application
- Unsigned or undated application
- Employer's address identified only as a post office box
- The loan purpose is cash-out refinance on a recently acquired property
- The buyer currently resides in the subject property
- Extreme payment shock (may signal straw buyer and/or inflated income)
- Purchaser of an investment property does not own a primary residence

Purchase Agreement/Sales Contract Reg Flags

- Non-arm's length transaction, seller is otherwise related to, or has an interest in the property or borrower, such as a real estate broker, relative, employer, etc.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- The seller is not currently reflected on the title paperwork
- The purchaser is not the applicant
- Purchaser(s) deleted from or added to the sales contract
- No real estate agent involved
- Power of Attorney is used
- A second mortgage is indicated, but not disclosed on the application
- Earnest money deposit equals the entire down payment or is an odd amount for the local market
- Multiple checks used for earnest money deposit are not in sequential order, e.g. check number 303 dated 10/1/2024, check number 299 dated 11/3/2024
- Name and/or address on earnest money deposit check differs from the buyer
- Real estate commission is excessive
- The sales contract is dated after credit documents
- The sales contract is boiler place with limited fill-in-the-blank terms, not reflective of a true negotiation

Credit Report Red Flags

- No credit history or "thin" credit files
- Invalid Social Security Number or variance from that on other documents
- Duplicate Social Security Number or additional user of the number
- Recently issued Social Security Number
- Liabilities shown on credit reports that are not on the mortgage application
- Length of established credit is not consistent with consumer's age
- Credit patterns are inconsistent with income and lifestyle
- All tradelines were opened at the same time
- Authorized user accounts have superior payment histories
- Significant differences between original and new or supplemental credit reports
- "Also known as" (AKA) or "doing business as" (DBA) name is indicated
- Numerous recent inquiries
- Missing pages and/or supplements
- Employment discrepancies
- Social Security Number death or fraud alert

Employment & Income Documentation Red Flags

- Consumer's job title is generic, e.g. "manager" "vice president"

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Employer's address is a post office box, the subject property address, or consumer's current residence
- The consumer's residence is (will be) in a location remote from the employer
- An employer's name is similar to a party to the transaction, e.g. uses the consumer's initial in its name
- Employer unable to be contacted
- Year-to-date or past-year earnings are even dollar amounts
- Withholdings not calculated correctly (check FICA tables)
- Withholding totals vary significantly from pay period to pay period
- Pay period dates overlap and/or do not correspond with other documentation
- Abnormalities in paycheck numbering
- Handwritten VOE, pay stubs, or W-2 forms
- The W-2 presented is not an employee's copy
- Employer's identification number has a format other than 12-3456789
- Income appears to be out of line with the type of employment
- Self-employed consumers do not make estimated tax payments
- Real estate taxes or mortgage interest claimed, but no ownership of real property disclosed
- Tax returns not signed or dated
- High-income consumers without paid tax preparers
- Paid tax preparer signs taxpayer's copy of tax returns
- Interest and dividend income do not align with assets
- The consumer reports substantial income but has no cash in the bank
- Large increase in housing expense
- Reasonableness test, consumer's income seems to be out of line with the type of employment, age, education, and/or lifestyle

Asset Documentation Red Flags

- Down payment source is other than deposits (gift, sale of personal property)
- Consumer's salary does not support savings on deposit
- Consumers do not use traditional banking institutions
- Balances are greater than the FDIC or SIPC insured limits
- High-asset consumer investments are not diversified
- Excessive balance maintained in checking accounts
- Dates of bank statements are unusual or out of sequence
- Recently deposited funds without a plausible paper-trail or explanation
- Bank account ownership includes unknown parties

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Balances verified as even dollar amounts
- The two-month average balance is equal to the present balance
- The source of earnest money is not apparent
- Earnest money is not reflected in account withdrawals
- Earnest money is from a bank or account with no relationship to the consumer
- Bank statements do not reflect deposits consistent with income
- Reasonableness test, assets appear to be out of line with type of employment, consumer age, education, and/or lifestyle

Appraisal Red Flags

- Appraisal ordered by a party to the transaction
- Occupant is identified as tenant or unknown
- The owner is someone other than the seller shown in the sales contract
- Appraisal indicates the transaction is a refinance, but other documentation reflects a purchase
- The purchase price is substantially higher than the predominant market value
- The purchase price is substantially lower than the predominant market value
- Subject property obsolescence is minimized
- Large positive adjustments made to comparable properties
- Comparable sales prices do not bracket the subject's adjusted value
- Comparable sales are not similar in style, size, and amenities
- Dated sales used as comparable sales
- New construction/condo conversion, all comparable sales located in subject development
- Comparable properties are a significant distance from the subject or located across neighborhood boundaries (main arteries, waterways, etc.)
- Map scale distorts distance of comparable properties
- "For Rent" sign appears in photographs
- Photos appear to be taken from an awkward or unusual standpoint
- The address reflected in photos does not match the property address
- Weather conditions in photos are inconsistent with date of appraisal
- Appraisal dated before sales contract
- Significant appreciation in a short period of time
- Prior sales are listed for subject and/or comparables without adequate explanation

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Title Red Flags

- Prepared for and/or mailed to a party other than the lender
- Evidence of financial strain may indicate a compromised sale transaction (flip, foreclosure rescue, straw buyer refinance, etc.), or might suggest undisclosed credit problems in the case of a refinance; some indicators of financial strain may include:
    - Income tax, judgements, or similar liens recorded
    - Delinquent property tases
    - Notice of default of modification recorded
- Seller not on title
- The seller owned the property only a short time
- The buyer has pre-existing financial interest in the property
- Date and number of existing encumbrances do not make sense
- The chain of title includes an interested party, such as a realtor or appraiser
- Buyer and seller have similar names

MLOs and loan processors play a key role in detecting and preventing mortgage fraud at Cranbrook Loans Group, Inc.. During the application process, the documentation provided by the applicant should be reviewed for consistency and accuracy throughout the loan file. Any inconsistencies or red flags identified should be addressed with the applicant, brough to the attention of management, or both depending on the situation.

Consequences of Loan Fraud

The consequences of loan fraud are far reaching and expensive. Cranbrook Loans Group, Inc. warrants the quality of our loan production to our creditors. Fraudulent loans may not be sold in the secondary market. If a loan is discovered to be fraudulent, Cranbrook Loans Group, Inc. could be contractually obligated to repurchase the loan. Fraudulent loans harm our reputation and strain the relationship with our creditors. The consequences for those who participate in the fraud are even more severe.

Any employee/contractor found to be involved in mortgage fraud will be immediately terminated and Cranbrook Loans Group, Inc. will report the fraud to the state regulatory agency. In addition, you could face civil action by us, the borrower, or other parties to the transaction. You risk criminal prosecution, losing your license, being placed on barred participant lists, and no longer being able to originate or process mortgage loans, or be in the business altogether.

Borrowers that engage in mortgage fraud risk acceleration of the mortgage and being homeless. They may face criminal prosecution, civil action, and forfeiture of any professional licenses. Not to mention the long-term, adverse effect it may have on their credit history.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Identity Theft Prevention Policy

Overview

This Identity Theft Prevention Policy was developed pursuant to the Federal Trade Commission's Red Flag Rule, promulgated as part of the Fair and Accurate Credit Transactions Act of 2003. Cranbrook Loans Group, Inc. is subject to the regulation because we broker residential mortgage loans to creditors who fund them. Throughout the application process, we obtain a significant amount of personal information about our customers. This "identifying information' is any name or number that may be used, alone in connection with any other information, to identify a specific person, including name, address, telephone number, Social Security number, date of birth, government issued driver's license or identification number, alien registration number, government passport number, and employer or taxpayer identification number."

We have taken steps to safeguard this information and have trained our employees/contractors on this policy to eliminate risks that can arise for our company and our customers from identity theft. Cranbrook Loans Group, Inc.'s Identity Theft Prevention Policy is designed to detect, prevent, and mitigate identity theft in connection with the origination of mortgage loans. Consideration was given to the various types of mortgage loans we offer, the methods we accept applications (face-to-face, over the phone, and online), the complexity of our operations, and any prior experience or exposure to an identity theft incident. Cranbrook Loans Group, Inc.'s Senior Management has approved the use of this policy in daily operations and has appointed the Compliance Director to oversee the administration of the policy.

Identified Red Flags

Cranbrook Loans Group, Inc. has reviewed Appendix A of the FTC regulation and includes following Red Flags of identity theft that are applicable to mortgage broker activity.

1. Alerts, notifications, and warnings from credit reporting agencies
    a. A fraud or active duty alert is included with a credit report
    b. A credit reporting agency provides a notice of credit freeze in response to a request for a credit report
    c. A credit report contains a notice of address discrepancy
    d. Activity on a credit report is inconsistent with the history or pattern of activity for that consumer. Such as:
        i. A recent and significant increase in the volume of credit inquiries
        ii. An unusual number of recently established credit relationships

2. Suspicious documents

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

   a. Documents provided for identification appear to have been altered or forged
   b. The photograph or physical description on the ID is not consistent with the appearance of the applicant presenting the ID
   c. Other information on the ID is not consistent with information provided by the applicant
   d. The application appears to have been altered or forged, or gives the appearance of having been destroyed and reassembled

3. Suspicious personal identifying information
   a. The applicant's address does not match any address in the credit report
   b. The social security number has not been issued or is listed on the Social Security Administration's Death Master File
   c. There is a lack of correlation between the social security number range and date of birth of the applicant
   d. The address or phone number on the application was also found on a fraudulent application
   e. The address on the application is fictitious, a mail drop, or a prison
   f. The phone number is invalid, or associated with an answering service
   g. The phone number can be traced back to a phone number generating or spoofing app
   h. The social security number is that of another person filing an application
   i. The address or phone number is found on a large number of applications
   j. The applicant fails to provide all required personal identifying information when informed the application is incomplete

4. Unusual use or other suspicious activity related to a covered account
   a. A new revolving credit account is used in a manner commonly associated with known patterns of fraud, including using the majority of the credit available for cash advances or merchandise that can easily be converted into cash, or the customer fails to make the first payment, or makes only the first payment and no others
   b. Account use that is inconsistent with the applicant's prior use of the account, such as nonpayment when there has been no history of late of missed payments, a material increase in the use of available credit, or other material changes that differ from the consumer's normal use

5. Notification from customers, victims of ID theft, law enforcement or others
   a. If any person notifies you that Cranbrook Loans Group, Inc. has taken a fraudulent mortgage application, you must immediately inform your manager so a proper investigation can occur, as this could trigger reporting requirements to state and federal authorities

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Consideration of the circumstances unique to each loan transaction should be given when evaluating any red flag as a potential indicator of identity theft.

Detection of Red Flags

Employees/contractors have been adequately trained to detect red flags of ID theft throughout the loan origination process. Taking one's time and having an eye for detail is helpful when reviewing a loan file for consistency and completeness. As part of our Customer Identification Program within our anti-money laundering policy, we collect the applicant's name, address, taxpayer identification number, and date of birth. MLOs and processors will review all information presented on the application and in the loan file and compare it with this identifying information. Credit reports will be reviewed and compared to other information in the loan file, and we will question any inconsistencies.

If the review identifies any red flags, the MLO and/or process should investigate the red flag to determine if there is a legitimate reason behind it, or not. This can include consulting external sources, discussing the issue with the applicant, and if necessary, reviewing the situation with your manager to determine if further action is required. If you believe the applicant is victim of ID theft, a possible straw buyer, or perpetrating other fraud, you must seek input from management as we do not want to risk originating a loan that may have to be repurchased.

Response to Red Flags

Upon discovery of a red flag, the specific response taken will be based upon the circumstances specific to the transaction. This includes any additional factors that could increase the likelihood ID theft may have occurred, such as a security breach at Cranbrook Loans Group, Inc. or one of our third-party providers, such as a creditor, credit reporting agency, or independent processor.

In all cases, the first step will be to determine whether we know the true identity of the applicant. If we can make this determination, Cranbrook Loans Group, Inc. will submit the application to a creditor for underwriting and decision-making on whether to fund the loan. During the underwriting process, the creditor will often perform additional verifications, including the use of fraud detection software. If we are unable to verify the identity of the applicant to our satisfaction, we will decline the loan and inform the applicant using the Adverse Action Notice. Other appropriate actions may include contacting the consumer, having the consumer change passwords, security codes, or other methods of accessing his/her online mortgage loan application, or notifying law enforcement.

Address Discrepancy Policy

In addition, Cranbrook Loans Group, Inc. has trained its MLOs and processors to review credit reports for address discrepancy alerts. An address discrepancy alert is provided

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

by the credit reporting agency, within the report, alerting the user that the address they input for the consumer is substantially different than the address on file for that consumer. For reports that contain the alert, we are required to verify that the report we received was for the correct person. MLOs and processors will do this by verifying the addresses with the consumer, reviewing the documents for any address variations that should be clarified, and consulting other resources such as online people finder and public information websites. Documentation should be maintained in the loan file to evidence that the report is for the correct person, using whichever means was appropriate for the situation.

Requests from Victims of ID Theft

Cranbrook Loans Group, Inc. will respond to requests from identity theft victims for records of loan transactions that are alleged to have been initiated by someone who used another person's identity. These requests must be in writing and come from the victim. The victim must be able to prove their identity with a valid id or other reasonable means and provide proof of the theft by supplying a copy of a police report or affidavit of ID theft.

A response will be provided within 30 days of the request and will include a copy of the application and other transaction related records that Cranbrook Loans Group, Inc. maintains. A response may be provided to the victim, a government agency as specified in the victim's written request, or to any law enforcement agency investigating the theft and authorized by the victim to receive the information.

Should Cranbrook Loans Group, Inc. not be able to determine the true identity of the requestor, determine the request is based upon a misrepresentation, or for Internet data, Cranbrook Loans Group, Inc. has the option to not respond. However, we will give every request our best effort to respond and provide the requested information, including contacting the requestor to obtain any information they may have about the alleged transaction, including application date, account number, or other identifying information that would help us to respond.

At this time, we do not require the victim's requests to be mailed to specific address; all requests will be immediately sent to the Compliance Director for investigation and response. Should this policy change in the future, we will inform consumers and victims of the address to send requests to on our website and in other communications.

Policy Administration

The consequences of identity theft can be devastating to a consumer and a creditor or mortgage broker. As a result, we take the administration of this policy seriously. Cranbrook Loans Group, Inc.'s Compliance Director will oversee the policy/program and will be involved should any red flag identified trigger any reporting requirements, such as filing a SAR or a breach notification with a state regulatory agency.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Training

All employees/contractors of Cranbrook Loans Group, Inc. that maintain covered accounts will be trained in the identification, detection, prevention, and mitigation of the Red Flags of identity theft will be trained upon hire and refresher training will be required annually. Training will include Cranbrook Loans Group, Inc. procedures. Evidence of completion, including date completed will be retained by Cranbrook Loans Group, Inc. in our corporate records, this can include training attendance rosters, completion certificates, and other records of the training attended and/or material presented.

Service Provider Oversight

If Cranbrook Loans Group, Inc. enters into an agreement with a service provider, other than a creditor or a consumer reporting agency, the Compliance Director will oversee the service provider in compliance with our Vendor Management Policy.

Policy Review and Updates

To keep our policy effective, it will be reviewed annually and updated periodically to reflect any changes in the risks presented with brokering mortgage loans, including:

- Any experiences Cranbrook Loans Group, Inc. has had with ID theft
- Changes in the products we offer
- Changes in the way ID theft is carried out
- Changes in detection, prevention and mitigation methods
- Changes to the business arrangements, such as a merger, acquisition, entering a new geographic area, or bringing on a new service provider

Reporting

The Compliance Director will provide Senior Management with reports concerning Cranbrook Loans Group, Inc.'s effectiveness in complying with this policy. Reports will be annually, unless an event occurs causing the frequency to increase, and will include details concerning any red flags that required reporting to the Compliance Director and the responsive action taken, including whether any special reports, such as a SAR, had to be filed. Reports will also include details and recommendations on any changes the policy may be necessary to address any recent ID theft incidents or changes to the way criminals are committing the crime. The Compliance Director should consider how Cranbrook Loans Group, Inc.'s policy could be strengthened by observing and learning from incidents experienced by other mortgage brokers, creditors, or industry service providers that may hit the news or come to light through other associations and connections. Staying abreast of industry news and how our operations may be impacted if Cranbrook Loans Group, Inc. were to fall victim to an identity theft incident is a critical piece to keeping our policy relevant.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Privacy Policy

Gramm-Leach Bliley Act (GLBA)

§ 6809

Overview

The GLBA requires financial institutions to explain their information-sharing practices to their customers and to safeguard sensitive data.

Rulemaking authority to implement the GLBA's privacy provisions was initially spread among multiple agencies. In 2010, the Dodd-Frank Act transferred the majority of GLBA's privacy rulemaking authority to the Consumer Financial Protection Bureau (CFPB).

The GLBA, among other things, requires that financial institutions provide their customers with initial and annual notices regarding their privacy practices, and allow their customers to opt out of sharing their information with certain nonaffiliated third parties.

A Privacy Notice must be provided no later than when the customer relationship is established. A customer relationship is established as soon as an individual provides personally identifiable financial information to the broker/non-delegated correspondent lender to obtain a mortgage.

The rule distinguishes consumers from customers because Cranbrook Loans Group, Inc. responsibilities to provide notices to consumers and to customers differ in several respects.

- All customers must receive initial privacy notices.
- Initial notices (or short form notices) must be provided to consumers who are not Cranbrook Loans Group, Inc. customers, but only if Cranbrook Loans Group, Inc. intends to disclose nonpublic personal information about those consumers to non-affiliated third parties (unless an exception in 12 CFR Part§§ 1016.13 to 1016.15 applies such that no initial notice is required prior to the disclosure). 12 CFR Part § 1016.1 et seq.

All consumers are entitled to the same protection from disclosure of non-public personal information under this regulation regardless of whether they are customers. Cranbrook Loans Group, Inc., therefore, will not disclose the non-public personal information of any consumer or any customer to any non-affiliated third-party outside of the exceptions

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

unless Cranbrook Loans Group, Inc. has provided a Privacy Notice and a reasonable opportunity to opt out, and the consumer or customer does not opt out.

Cybersecurity and Information Security

Overview

As a mortgage company, Cranbrook Loans Group, Inc. is required to protect the non-public personal information we obtain during the loan application process. Our protection begins as soon as we obtain the information and extends through disposal of the information by implementing processes, systems, and procedures to reduce the risk of unauthorized access, or use of, the non-public personal information we maintain in our business. This Cybersecurity and Information Security Policy is implemented pursuant to Federal Trade Commission (FTC) regulations at 16 CFR Part 314, to protect the confidentiality of consumer Non-Public Personal Information (NPI).

This policy applies to all consumer NPI obtained by the company. Non-public Personal Information is any data or information considered to be personal in nature and not subject to public availability. Personal information includes, but is not limited to:

- Individual names
- Social Security Numbers
- Credit or debit card numbers
- State identification card numbers
- Driver's license numbers
- Asset information
- Credit/liability information
- Income information

Personal information does **not** include publicly available information that is lawfully made available to the public from federal, state, or local government records. Also, personal information does not include information that is available in a widely distributed media, such as a telephone book or a website that is available to the general public on an unrestricted basis.

Designation of a Qualified Individual

Cranbrook Loans Group, Inc. designates Michael Ayoub to be its Information Security Director, to coordinate the implementation and maintenance of this policy and any programs implemented pursuant to this policy. Michael Ayoub is qualified to oversee this policy because he/she has undergone additional cybersecurity awareness training,

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

stays abreast of changes to information security protocol for the mortgage industry, is knowledgeable about our systems and processes, and the risks that exist in our marketplace. Michael Ayoub may use the services of a professional company to implement or test various elements of our information security measures. The Information Security Director will work hand-in-hand with these individuals to ensure that our systems are properly protected from attack and intrusion. The Information Security Director is responsible for ensuring that:

- Employees are trained on information security measures and awareness,
- Our systems are protected from intrusion and unauthorized access,
- Monitoring and review of compliance with our policies and procedures occurs on a regular basis, which aligns with our risk tolerance and legal requirements,
- Senior management is informed of any security incidents or non-compliance with our policies and procedures,
- Notification to all required parties occurs if there is a security breach, and
- All necessary changes are made to prevent security breaches in the future.

In addition, the Information Security Director will work with the Compliance Director to ensure there is proper oversight of any third-party service providers we have engaged with to make certain they have their own policy, and/or abide by our security measures. Service providers that receive consumer non-public information from the company must demonstrate the ability to maintain the security of such information to the same extent that the company keeps such information secure.

Primary Vendors: ADV Credit, The Loan Store, UWM, Plaza Home Mortgage

If any of the above vendors are not regulated by a state or federal entity, our Compliance Director has reviewed the privacy, confidentiality, and security policies of those non-regulated service providers and is satisfied that the above service providers have the appropriate safeguards in place to secure any non-public information provided to them. More details are available in our Vendor Management Policy.

Information Security Risks

Cranbrook Loans Group, Inc. has identified the following principal areas of risk regarding the security of non-public information that a mortgage company collects, retains, and disposes of. These risks include:

- Fraudulent activities by employees that result in an unauthorized release of consumer non-public information

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Inadvertent release of consumer non-public information due to employee misconceptions and inadequate training to deter fraud
- Improper third-party access to information through fraudulent activities
- Inadvertent release of information by persons who have unnecessary access to consumer non-public information
- Inadvertent release of information to persons who may have physical access to corporate offices or remote work locations
- Improper interception of consumer information transmitted electronically
- Improper access to information that is being disposed of by the company
- Unauthorized use or release of information by vendors and other service providers

The Information Security Director will be responsible for identifying additional risks and for removing previously identified risks from this policy as experience dictates. The protection of consumer non-public information and prevention of unauthorized use or access to such information requires commitment from the entire team. Employees/contractors are expected to adhere to the policies addressed below and are required to sign our Employee/Contractor Confidentiality Pledge (Exhibit B).

Information Security Systems

General Requirements

Individuals that work with NPI post the greatest risk to that information falling into the wrong hands. Through lack of knowledge, or not following company policies, this NPI is often inadvertently put at risk. Setting up our computer systems to require access validation and only permitting individuals with a business need to access consumer's NPI are ways we can reduce the risks to that information.

Computers, that maintain, or access consumer information will be protected from external intrusion by internet firewalls and from internal intrusion by identification codes and individual passwords assigned to each employee. Employees/contractors are not permitted to borrow computer equipment from the company, or to remove computer equipment from a branch or corporate office (unless assigned a laptop). All employees/contractors will log in and log out of the office each day. No employee/contractor will log in or log out for any other employee/contractor. All employees/contractors will lock or log out of their computer whenever they leave their workstation. All computers will automatically lock if silent for more than ten minutes.

Computer virus detection and removal software will be installed on each computer and preset to update computer virus definitions and run full system scans at least once per

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

week. All incoming and outgoing electronic mail will be scanned for computer virus contamination. Any individual computer that has access to the internet will utilize a software firewall. A hardware firewall will be installed on the network system, if applicable, to prevent unwarranted intrusions. Employees/contractors who disable or circumvent security measures will be disciplined up to and including dismissal from employment. Employees/contractors are not permitted to download executable files from the internet, copy, or install executable files from storage media without prior review of the files and approval by the Information Security Director.

Passwords will be reset, at minimum, on a quarterly basis, and must be a minimum of eight characters with alphanumeric characters and at least one special character. Factory default passwords will be reset prior to usage of all new equipment. The same password should not be used for accessing all systems. Passwords should not be posted in the office. Employees/contractors are not permitted to share passwords. Whenever an employee/contractor terminates their relationship with the company, access to all systems will be terminated immediately.

Downloading and copying of information from company computers is prohibited, except with the express written authorization of the Information Security Director or Senior Management. When authorization is given to download or copy consumer information, the information will be copied or downloaded in the manner approved. All copies of information given to an employee/contractor will be returned to the company immediately upon completion of the employee/contractor's responsibilities regarding that information.

Every employee/contractor of Cranbrook Loans Group, Inc. who utilizes a laptop computer or mobile electronic data device, such as a tablet or cell phone, is responsible for the security of the confidential data stored, processed, and/or transmitted via that computer or device, and for following the security requirements set forth in this policy. Protection of confidential data against physical theft or loss, electronic invasion, or unintentional exposure is provided through a variety of means, which include user care and a combination of technical protections such as authentication and encryption that work together to secure mobile devices against unauthorized access. Prior to the use or display of confidential data via laptop computer or other electronic data mobile device, the following security measures must be in place:

- A laptop or other electronic data mobile device must authenticate the user before access to services on or by the device will be permitted
- Laptops and mobile devices must be configured to time out after ten (10) minutes of inactivity and require re-authentication before access to services on or by the device will be permitted
- The authentication mechanism(s) must not be disabled

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- An approved data encryption option must be enabled on laptop computers and mobile devices that transmit or store confidential information
- Laptops and mobile devices will be protected with antivirus software and updated immediately when an update notification is received. Once updated, the computer or device must be rebooted.

NOTE: Cranbrook Loans Group, Inc. email is protected with anti-virus and anti-spam software. The use of personal email addresses for company business is strictly prohibited because it may not offer the same level of protection. In addition, the use of unprotected mobile devices to access or store confidential data is prohibited regardless of whether the equipment is owned or managed by Cranbrook Loans Group, Inc.. ***All portable devices must be encrypted*.**

System Access

External access to company computers and databases will be permitted only to the Information Technology personnel authorized to maintain the systems, the Information Security Director, and Senior Management. No other person will have authorization to access company computers from an external computer terminal, unless the employee/contractor has been given approval to work remotely. As outlined in our Remote Work Policy, employees/contractors must use a Virtual Private Network (VPN) to access the system.

Employees/contractors will only be allowed to access information pertaining to loan files that they have originated or are processing. If the company establishes branch locations, the branch managers will only be allowed access to information pertaining to loan files in process from their branch. Employees/contractors will not share files or information from files with other employees/contractors. If an employee/contractor suspects that a consumer or another employee/contractor is engaging in unauthorized, improper, or illegal activities, they will be reported immediately to the Information Security Director and to Senior Management. Any allegations will be immediately investigated.

Requests for information from third parties received over the telephone, over the Internet, or by facsimile transmission, will not be honored until the identity of the individuals seeking the information is verified. Only employees/contractors who have been trained in security procedures for responding to information requests will respond to such requests. Information transmitted over the Internet will be encrypted utilizing strong (Secure Socket Layer) encryption software. Any attempt to obtain information through pretext calling or similar fraudulent efforts will immediately be reported to the Information Security Director and Senior Management.

The Information Security Director will maintain records of all company resources used to access our systems; this includes a record of all employees/contractors' work

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

location and the device(s) they use to access our systems. Any unauthorized access to a company computer will be reported immediately to the Information Security Director and Senior Management. Upon learning of any unauthorized access to a company computer, the Information Security Director will conduct an investigation to determine how access was granted. Any attempt to obtain information from the company through illicit, illegal, or unethical means will be investigated. This may require the assistance of other employees/contractors or outside professionals. The results of the investigation will be shared with Senior Management and used to help develop or revise procedures that will reduce or eliminate any such access in the future.

Change Management

Any changes to the systems and processes used by Cranbrook Loans Group, Inc. will be authorized by Senior Management. A "change" is defined as an addition, modification, or removal of a configuration that could have an effect on the business process changes (fixes) and minimize risk to IT services. The scope includes changes to systems, processes, tools, metrics and documentation, as well as changes to IT services and other configuration items. The Information Security Director is responsible for ensuring that changes are managed from inception to presentation and into implementation. This includes determining when a change is necessary, the maintenance window required, how the implementation will take place, and who will need to be notified of the change.

In order to keep our electronic data safe, Cranbrook Loans Group, Inc. relies upon our software providers to deliver any necessary patches, which are software and operating system updates that address security vulnerabilities with a program or product. Software vendors may choose to release updates to fix performance bugs, as well as to provide enhanced security features. When software patches are released and the end user fails to update immediately, cyber attackers will target those vulnerabilities for months or even years after updates are available.

It is the policy of Cranbrook Loans Group, Inc. to immediately run any updates received. All employees/contractors are required to run updates immediately upon receiving notice and reboot their computer once the update is completed. If necessary, the Information Security Director will require confirmation from the employee/contractor that the updates have been installed.

The Information Security Director is designated as the patch management authority that holds the ultimate responsibility and authority to plan, execute, authorize, or delegate all sections of this patch management policy and procedures to internal resources or third-party tools or vendors. The Information Security Director will verify and approve:

- Patching priority

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Patching testing and approval
- Any maintenance downtime needed for applying patches and updates
- Patch management reports
- Enforcement

The Information Security Director will rely upon a variety of sources to obtain information regarding the release of updates and patches for all assets within the scope of this policy, including signing up for automatic updates from the Cybersecurity and Infrastructure Security Agency (CISA) within the Department of Homeland Security.

This agency provides updates on the following topics: Cybersecurity Awareness, General Cyber Training, Incidence Response, Continuous Diagnostics and Mitigation (CDM), Known Exploited Vulnerabilities Catalog, Cybersecurity Advisories, Vulnerability Bulletins, and the CISA Community Bulletin. *https://www.cisa.gov/subscribe-updates-cisa*. The agency also offers vulnerability scanning and web application scanning through its Cyber Hygiene Services https://www.cisa.gov/cyber-hygiene-services. Subscriptions can be requested, for free, by emailing the agency at: vulnerability@cisa.dhs.gov. Signing up for these free services provides weekly and monthly reports to the Information Security Director that can be used to improve our defenses against cyber threats.

Asset and Data Inventory

Technology Assets

The Information Security Director and the Compliance Director will work together to ensure all computers, laptops, tablets, smartphones, etc. used to access our systems are logged and a record is maintained and updated as these resources are updated and/or replaced. As a general rule, Cranbrook Loans Group, Inc. does not allow employees/contractors to use personal equipment to access our data systems. Any exception to this must be provided, in writing, by the Information Security Director with the approval of Senior Management. Employees/contractors who use laptop computers and other portable electronic devices are expected to secure them whenever they are left unattended. In the event a laptop or other device is lost or stolen, the theft or loss must be reported immediately to the Information Security Director.

Technology assets are monitored and tracked so they can be replaced before they reach the end of their expected lifecycle. In addition, user-driven complaints and device failure will require device service or replacement. Hardware will be replaced if it is incapable of being upgraded to the latest operating system or system software. Once a device is taken out of use, it is set to be destroyed using a method that will render the information inaccessible, including smashing the hard drive.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

New asset acquisition:
The company has not purchased any new software applications or electronic equipment in the last twelve months.

The company operates on the Windows platform.

Cranbrook Loans Group, Inc. uses the Loan Origination System BytePro.

The search engine used is Google.

The company uses AVG antivirus software.

Changes to any systems must be approved, in advance, by Senior Management and/or the Information Security Director.

Data Inventory

To protect our consumer's NPI, we must first know what NPI we have and where the data is stored. All NPI collected by Cranbrook Loans Group, Inc. will be kept in our internal database, on a secure server supported by our origination software provider, or be stored in a secure cloud service. As a general rule, we do not maintain hard, paper copies of loan files.

If an employee receives a hard copy of consumer non-public information, it will be immediately scanned and uploaded to our database, the origination software, or cloud service. The hard copy will be returned to the consumer or shredded immediately. Employees are prohibited from retaining any consumer non-public information on their electronic devices.

The Compliance Director is responsible for ensuring that our Document Retention Policy is followed, as the number of consumers we maintain data on is directly related to the steps we need to take to ensure we are operating in compliance with the FTC's Safeguard Rule. Loan files that are no longer in process, because they have closed, been denied, or withdrawn by the applicant, will have access restricted to those who need the information for legitimate business purposes. The Compliance Director will review the records set for destruction to ensure they have passed the time frame required to be held by law or regulation, are no longer necessary for business, or otherwise required to be kept. The records will be disposed of in a secure fashion, within two years of the last date the information was used or required to be held.

Smaller financial institutions, entities that maintain data on fewer than 5,000 consumers, are exempt from several of the FTC's required elements for an information security policy, including the risk assessment be in writing, the continuous monitoring and penetration of our information systems, an incident response plan be in writing, and the Information Security Director must report to Senior Management in

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

writing. Therefore, it is imperative that we are aware of the number of consumers we retain NPI on, as this will directly impact our requirements under this rule. Implementing the above practices are industry best practices, regardless of the size of the company.

Additional Protective Measures

Multi-factor Authentication

Many of our lending partners have implemented multi-factor authentication for accessing their systems. The same is true for any cloud-based services we may use, such as a cloud-based loan origination platform, such as ARIVE or Calyx. For systems that do not use this method of verification, unique user IDs and passwords are required for access. Employees/contractors are not permitted to share user IDs and passwords, write down, or post their passwords where others can see them, or otherwise allow another individual to use their credentials to access any system or NPI.

Clean Desk Policy

Keeping a clean desk is an easy and simple way for employees/contractors to reduce the risk of unauthorized access to information and systems. The requirement to keep information secure applies whether the information is on paper, a portable storage device, or accessed by the computer system. Whenever an employee/contractor is away from his/her desk, care should be taken to ensure that no one can access consumer NPI, or systems containing NPI by taking the following actions, as appropriate:

- All sensitive and confidential paperwork must be removed from the desk and locked in a drawer, filing cabinet, or other secure location. This includes any electronic storage devices such as USB drives and portable hard drives.
- Computers must be locked when away from the desk and shut down at the end of the working day.
- Laptops, tablets, and other portable devices must be removed from the desk and locked in a drawer, filing cabinet, or other secure location.
- Keys for accessing said drawers, filing cabinets, or other secure location should not be left unattended.
- All papers that contain sensitive or confidential information must be shredded when no longer needed.

This policy also applies to any printer or fax machine workstations. All print jobs and faxes containing confidential information should be retrieved immediately.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Employee/Contractor Training

All employees/contractors will receive adequate security awareness training to recognize the safeguards necessary to secure information from unauthorized access. Training occurs immediately upon hiring of a new employee/contractor and covers the steps and processes we take at Cranbrook Loans Group, Inc. to keep all NPI safe and secure. In addition to company protocol, employees/contractors will be trained on the current methods scam artists are using to gain access to otherwise restricted data, and ways to avoid them. While it is unlikely our policies and procedures will change in regard to how we protect our information, it is still vital to cover these steps during annual training and reviews. If systems or processes change an updated training is required; we will not wait until the annual training session, we will ensure all impacted employees/contractors are aware of the new requirements and trained on them before rolling them out. Employee/contractor training records will be maintained by Human Resources or Senior Management.

Testing the System

The only way to know if our efforts are working is to test the system. This includes a review of computers, workstations, and other system access points, such as websites, online portals, and shared files. To ensure that our technological resources are safe and secure, we must review the hardware and software we use to look for previously unidentified weaknesses and measures to circumvent our security protocol. The Information Security Director may utilize the services of an outside IT firm to complete these audits or reviews. If audits are completed in-house, an Information Security Checklist may be used to document the findings. The Information Security Director will keep Senior Management informed of test results, security breaches, and other observances of non-compliance with our Cybersecurity and Information Security Policy. When necessary, or required by law, the Information Security Director will produce written reports and provide them to Senior Management.

Vulnerability Assessments

Vulnerability assessments are typically recurring, automated scans that search for known vulnerabilities in a system and flag them for review. Information Security teams use vulnerability assessments to quickly check for common flaws. The information systems used in today's mortgage landscape maintain logs of all authorized access granted and any attempts made, that were not granted access. The Information Security Director should review these reports to determine whether any access was granted to unauthorized individuals. These reports can be used, in combination with other relevant information security data, to complete a vulnerability assessment of our information security measures. The Information Security Director will complete a vulnerability assessment using the skills and knowledge of outside experts, by either contracting with a third-party IT company or using the free resources provided by the

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

federal government at CISA, or both. A regular vulnerability assessment, that occurs at least every six months, will allow the Information Security Director to better understand current risks and prioritize remediation efforts.

Continuous Monitoring

Continuous monitoring is an automated approach to constantly monitor a company's information systems and networks to detect security threats, performance issues, and other problems in real time. Continuous monitoring software can be set up to look for specifications the company wants to monitor and can send automatic notifications to IT personnel. The information that is derived from continuous monitoring can provide greater visibility of potential cybersecurity risks, which can lead to better protection of consumer non-public information.

Penetration Testing

A penetration test, or pen test, is a security test that launches a mock cyberattack to find vulnerabilities in a computer system. This knowledge will allow for safer information security systems, as the tests will reveal what hackers may be able to access versus guess at it, which helps in planning where to spend crucial resources, such as time and money. Often, penetration testing completed by security professionals, who approach the task like a real hacker, will uncover flaws in-house teams may miss. These professionals produce reports of their findings to be shared with the company and used to prioritize fixing system vulnerabilities.

The methods used by Cranbrook Loans Group, Inc. to test our system for vulnerabilities may vary depending on our experience with security breaches, the risks we have identified, our legal responsibility to implement such processes, and the resources available to pay for them. If we maintain non-public information on more than 5,000 consumers, Cranbrook Loans Group, Inc. will engage in annual penetration testing and vulnerability assessments as least every six months. The Information Security Director will work with Senior Management to ensure financial resources are dedicated to information system security.

Incident Response Plan

Recent security breaches that have made national headlines serve as proof that no matter the size, or the amount of resources available, anyone can fall victim to a security breach. As a result, Cranbrook Loans Group, Inc. has incorporated this incident response plan. Proper notification is essential to helping consumers adequately protect themselves from potential identity theft. This plan covers any unauthorized access and/or acquisition of a computer system, or consumers' non-public personal data that materially compromises the security or confidentiality of personal information maintained by Cranbrook Loans Group, Inc..

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Duties and Responsibilities

The Information Security Director and the Compliance Director will work together to implement this plan, with the Information Security Director overseeing the aspects related to the information systems and the Compliance Director responsible for notifications, reporting, and document retention. The Information Security Director will be made aware of any security breaches that are made known to any employee/contractor, regardless of how they were detected. Reporting is required immediately upon discovery.

At that time, the Information Security Director will investigate the security breach to determine the weaknesses that led to the breach and the proper steps it will take to correct it. This may require the help of outside professionals. Throughout the process, the Information Security Director will keep the Compliance Director informed and the two will work together to ensure any notifications to consumers, state and federal agencies, and the consumer reporting agencies are timely and complete. Each States' Attorney General's Office has security breach notification laws and requirements for companies to follow in the event of a data breach. Cranbrook Loans Group, Inc. will follow all reporting requirements for the states we operate in.

Consumer Notification

Cranbrook Loans Group, Inc. will provide notice of the breach if (1) encrypted information is accessed and acquired in an unencrypted form; (2) the security breach is linked to a breach of the security of the encryption; or (3) the security breach involves a person with access to the encryption key. We will notify all impacted consumers by mail, email, or telephone. Notification will be made as soon as possible but no later than five (5) days after a security breach is detected and will include the following information:

- Our contact information,
- A description of the security breach,
- The date on or around when the breach occurred,
- When we became aware of the breach,
- The steps we have taken to remedy the breach,
- The number of consumers impacted by the breach.
- Steps consumers can take to protect themselves from identity theft
- Contact information for the FTC, and states' Attorney Generals' offices, and
- Other information required by law

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Any employee/contractor who receives questions as a result of a security breach notification should forward the request to the Compliance Director who can respond appropriately.

Large-scale security events can trigger substitute notice provisions of state law(s). A substitute notice may be triggered if the breach involves a large number of consumers; usually 100,000 consumers or more, providing the breach notice will cost the entity over typically over $100,000, or if the entity does not have an address, phone number, or email address for the consumers impacted. If a substitute notice is provided, it must be done on each of the following platforms:

- Sent by email to the consumer
- Posted on our website, and
- Distributed by a statewide media outlet

Each state law has its own triggers and requirements for substitute notifications.

Agency Notifications

In addition, each state law may have its own timing and provision requirements for Cranbrook Loans Group, Inc. to notify the Attorney General's Office, State Mortgage Regulators, and the Credit Reporting Agencies. The FTC's Safeguard Rule requires, if the security breach involves over 500 consumers, Cranbrook Loans Group, Inc. will notify the FTC within 30 days of discovery of the event. Notification to the FTC must include the following information:

- Cranbrook Loans Group, Inc. name and contact information
- A description of the types of information involved in the security breach
- The date or date range of the breach
- The number of consumers affected, or potentially affected by the breach
- A general description of the nature of the breach, and
- Whether any law enforcement official has provided a written determination that notifying the public would impede a criminal investigation or cause damage to national security, and a way for the FTC to contact the law enforcement official.

Cranbrook Loans Group, Inc. will retain a copy of the consumer notice and agency notices sent as a result of a security breach. All documentation related to a security breach will be retained for future evaluation and planning purposes, as historical data can help prevent future breaches.

Business Continuity Plan

In the event of a disaster which interferes with Cranbrook Loans Group, Inc.'s ability to conduct business from one of its offices, this plan is to be used to coordinate business recovery. A disaster is defined as any event that renders a business facility inoperable

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

or unusable so that it interferes with the organization's ability to deliver essential business services. The plan is designed to contain, or provide reference to, all information that might be needed at the time of a business recovery.

Overview

The objective of the Business Continuity Plan is to coordinate recovery of critical business functions in managing and supporting the business recovery in the event of a facilities (office building) disruption or disaster. This can include short or long-term disasters or other disruptions, such as fires, floods, earthquakes, explosions, terrorism, tornadoes, extended power interruptions, and other natural or man-made disasters. Since the threat to our organization's continuity of operations can be great during a pandemic outbreak, we also have a Pandemic Response Policy in place to ensure we can carry out all our essential functions and services. While we understand that depending upon the severity of the event triggering this plan, we may be forced to suspend some operations, our Business Continuity Plan will enable us to resume or remain operational.

Recovery Time for Critical Data

The nature and extent of the disaster will have a direct impact on the time it will take to recover business operations. However, our goal is to reestablish operations within forty-eight (48) hours. All vital records that would be affected by a facilities disruption are maintained and controlled by Senior Management. Records are backed up online using a secure cloud service or within our Loan Origination System which will minimize our downtime. Employees/contractors are prohibited from storing documents on computer hard drives.

Backup and Data Recover Process

Using a cloud-based data storage and origination system that is backed up daily, we reduce the risk of not being able to recover data during a disaster. If the disaster destroys hardware, new machines will be purchased, and software will be installed. If the disaster impacts internet availability, Cranbrook Loans Group, Inc. will obtain hot spots for internet access. If phones are impacted, the extent of the outage will have a direct impact on the alternative ways we communicate with consumers during the disaster; voiceover IP services or email may be used to inform consumers about our current situation and provide information about their loan applications until phone service can be restored.

Alterative Work Locations

The nature and extent of the disaster will have a direct impact on the alternative work locations we secure. Because our LOS and consumer data primarily resides in a cloud environment, operations can resume at a number of business appropriate locations, including working remotely from one's home for a short period of time, or Cranbrook

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Loans Group, Inc. renting or utilizing another commercial office space. Any employee/contractor that will be working remotely will be required to follow our Remote Work Policy to ensure the safety and confidentiality of nonpublic data.

Cranbrook Loans Group, Inc. will ensure the following with respect to alternative work locations during a disaster or pandemic:

1. Senior Management will communicate with employees/contractors the need to follow or perform revised work procedures to accommodate the needs of the team and/or general public.
2. The Information Security Director will ensure the ability for significantly increased telecommuting including bandwidth, VPN capacity/licensing, ability to offer voice over IP and laptop/remote desktop availability.
3. Employees/contactors should communicate with Senior Management about any personal impacts they may be experiencing, such as the destruction of his/her home, household members that may work for emergency services such as EMTs, police officers, or firefighters, or other situations that may impact their availability during the disaster.

Pandemic Response Policy

The objective of this policy is to address the reality that pandemic events can create personnel and technology issues outside the scope of traditional planning as potentially a large percentage of the workforce may be unable to come to work for health or personal reasons. Senior Management will communicate with employees/contractors the need to follow or perform revised work procedures to accommodate the needs of the team and/or general public. These revisions may be specific to the geographic location, or personal needs of the employee/contractor. Normal operations are expected to resume upon the conclusion of a pandemic.

Any exception to the policy must be approved by Senior Management in advance. An employee/contractor found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Plan Testing and Training

Cranbrook Loans Group, Inc. will be ready for a disaster by annually testing this Business Continuity Plan. The goal is to ensure that when the pressure is on, the company can respond appropriately and resume operations with as little downtime as possible. Testing can include simulations, a walk though of steps required to resume business, or other methods that will allow Cranbrook Loans Group, Inc. to prepare for a disaster. The testing method may vary over the years to ensure Cranbrook Loans Group, Inc. is prepared for a variety of different disasters or situations.

Senior Management will identify key individuals that will be necessary to implement the Business Continuity Plan, such as the Compliance Director, Branch Managers, and

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

others and ensure they are trained in the execution of this plan. In the event of a disaster, other employees/contractors will receive information necessary to perform their job functions for the duration of impact, which may evolve as the situation evolves.

Vendor Management Policy

Overview

This Vendor Management Policy was developed pursuant to the Federal Trade Commission's Safeguard Rule and Red Flag Rule, promulgated as part of the Fair and Accurate Credit Transactions Act of 2003 and CFPB Supervisory Guidance 2016-02. Cranbrook Loans Group, Inc. takes seriously its obligation to ensure that each of its service providers has established a security program that is consistent with the requirements of these rules. Cranbrook Loans Group, Inc. has adopted this Vendor Management Policy to ensure that both existing and new service providers comply with, or exceed, these legal requirements.

A Service Provider is generally defined in section 1002(26) of the Dodd-Frank Act as "any person that provides a material service to a covered person in connection with the offering or provision by such covered person of a consumer financial product or service" §12 U.S.C. 12 U.S.C. 5481(26). A "vendor" is another term for service provider. The terms service provider and vendor will be used interchangeably throughout this and other documents pertaining to vendor management.

Cranbrook Loans Group, Inc. applies its vendor management policy to any person or entity that maintains, processes, or otherwise is permitted to access customer information through its provision of services directly to Cranbrook Loans Group, Inc.. Our primary vendors include ADV Credit, The Loan Store, UWM, Plaza Home Mortgage.

Responsibility and Delegation of Duties

Senior Management is responsible for ensuring the adequacy of all aspects of the Cranbrook Loans Group, Inc.'s policies and procedures, including vendor management. Senior Management has delegated the duties relating to vendor management to the Compliance Director. However, when addressing matters concerning information security, the Compliance Director will call on the expertise of the Information Security Director to ensure a proper review of all service providers is conducted.

Procedures

As part of Cranbrook Loans Group, Inc.'s oversight of its service providers, the following procedures will be followed:

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

A. Prior to engaging with a new service provider, their ability to comply with the Safeguard Rule and Red Flags Rule will be evaluated to ensure they do not present unwarranted risk to consumers and our business.

B. Require, by contract, that service providers implement appropriate measures designed to meet the objectives below:

   1. Ensure the security and confidentiality of customer information.
   2. Protect against any anticipated threats or hazards to the security or integrity of such information.
   3. Protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any customer.
   4. Dispose of confidential customer information in a secure manner.
   5. Immediately inform financial institutions in the event of a security breach involving confidential customer information.
   6. Consequences for violating any compliance related responsibility, including engaging in unfair, deceptive, or abusive acts or practices.

C. Monitor our non-regulated service providers to confirm that they have satisfied the obligations described above. As part of this monitoring, the Compliance Director will review documents including, but not limited to, policies, procedures, internal controls, training materials, contracts, audits, summary of test results or other equivalent evaluations of its service providers. These reviews will take place on at least an annual basis for existing vendors. For new vendors, these documents will be reviewed prior to accepting any bid or signing any contract.

D. Appraiser selection is handled by the Appraisal Management Company (AMC) engaged by the funding lender or end investor, as such appraisers and AMCs are not part of our vendor oversight. The AMC is responsible for providing third-party review of appraisers on their approved roster.

E. Third-party processing companies present risks on several levels that need to be actively mitigated, including compliance and information security risks. Depending on state requirements, third-party processors may be required to hold an MLO license to process, others may not, if they are a W2'd employee of a licensed entity. Doing business with a company that is not properly set up to operate in a specific location can present compliance risks for Cranbrook Loans Group, Inc., including a violation of aiding and abetting unlicensed activity. Because of the significant amount of customer data shared with processors, the ability of the service provider to adequately protect this data should not be taken lightly.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Annual Review

Annually, the Compliance Director and Information Security Director will conduct a review of all service providers that are not regulated by a state or federal authority, to determine their compliance with protecting non-public consumer information. If the review identifies a security breach, non-compliance with safeguard policies, or other egregious actions occurring at the service provider, the Compliance Director will report back to Senior Management for consideration to terminate the relationship.

Branch Oversight Policy

Overview

Cranbrook Loans Group, Inc. is committed to ensuring compliance with state and federal laws and regulations at all locations and has adopted this branch oversight policy to help with that endeavor. Prior to opening any branch location, SAFE ACT Director will ensure all state licensing and branch manager qualifications have been satisfied and the location is approved to operate. Various company requirements, such as employee/contractor training, cyber security, and fraud prevention apply to all, regardless of their work location. The Compliance Director will work with branch manager(s) to effectively oversee branch compliance.

Branch Manager Responsibilities

The branch manager is responsible for the day-to-day functions of the branch and will ensure that the corporate office is aware of its performance. Regular meetings and communication between the branch and the corporate office is a must to ensure branch compliance. Topics include, but are not limited to:

- Changes to policies and procedures
- Changes to state and/or federal law
- Changes to products being offered
- Changes to branch staffing and/or use of third-party vendors
- Employee/Contractor performance
- Branch performance or profitability
- Consumer complaints about branch interactions
- Branch advertising and marketing

In addition, branch managers are responsible for overseeing the pipeline of loans being originated by the branch. They should be in contact with their team to ensure that applications and inquiries are being handled appropriately and decisioned timely. Questions and issues with loan production should be directed to the branch manager

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

who is responsible for including the Compliance Director to ensure problems are handled correctly and senior management is aware, if necessary.

Information Security at the Branch

All branch employees/contractors are required to comply with Cranbrook Loans Group, Inc.'s Cybersecurity and Information Security Policy. The branch manager will coordinate and help facilitate any provision of the policy deemed necessary to ensure the non-public information of the branch customers remains secure. Michael Ayoub, the company's Information Security Director, will ensure the branch manager is aware of his/her responsibilities. Any security breach must be reported to Michael Ayoub as soon as possible.

Annual Review of the Branch

To ensure proper risk management associated with any branch location, Cranbrook Loans Group, Inc. will require each location to participate in an annual review. Reviews can occur in person or virtually and will be documented. Topics to be included in the annual review include, but are not limited to, the following areas:

- Proper and correct office signage
- State and federal posters and disclosures
- Enforcement of the Clean Desk Policy and other security measures
- Review of branch-related findings that have come from quality control reviews or other audits/examinations during the year and any implemented changes
- Review of any complaints about the branch received during the year and any implemented changes, if appropriate and necessary
- Branch employee/contractor training compliance

Because the review is risk-based, the topics covered can change from year to year, provided the review includes enough areas to compare the results to prior year's review.

Additional Branch Requirements

While the entire compliance manual applies to branch operations, it is important to highlight the following:

- The branch manager will work with the Compliance Director and the SAFE ACT Director when establishing MLO compensation for any new hire, or if/when changes are needed to an existing MLO's comp plan
- Any advertising/marketing that the branch would like to use must in compliance with the Advertising Policy and must be reviewed prior to its use
- If the branch uses any third-party vendors that are not used by the corporate office, the branch manager will assist in the initial review and annual vendor review that is completed

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Any red flags of fraud, identity theft, or money laundering will be directed to the AML Compliance Director
- The branch manager will work with the SAFE ACT Director to ensure the branch and its MLOs remains properly licensed, any licensing items are cleared in a timely fashion
- The pre- and post-closing quality control processes apply to all branch locations

With today's technology, branch oversight can be achieved in simple and cost-effective ways that will allow Cranbrook Loans Group, Inc. to have confidence that its branch location(s) are operating in compliance and do not pose undue risks for the company.

Remote Work Policy

Scope

This remote work policy applies to all sponsored Mortgage Loan Originators (remote employees/contractors) employed by Cranbrook Loans Group, Inc..

Eligibility requirements

Subject to management approval, Mortgage Loan Originators have the option of working remotely or may work from the corporate office, if applicable.

Work expectations and schedule

Employees/contractors who work remotely are expected to:

- Be fully accessible during core work hours and respond to critical emails within 1-2 hours.
- Be accessible to all client phone calls, emails, and texts.
- Be available to Senior Management and processing staff.

Equipment and supplies

All equipment supplied by Cranbrook Loans Group, Inc. is to be used for business purposes only.

Cranbrook Loans Group, Inc. is not responsible for expenses associated with working at home, including heat, electricity, internet, or phone service.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Technical support

Cranbrook Loans Group, Inc. will provide technical support during business hours. Remote employees/contractors experiencing technical difficulties should contact Senior Management immediately.

Workspace Guidelines

Remote employees/contractors are expected to keep their workspace free of safety hazards. To ensure employee/contractor health and safety, we advise our remote employees/contractors to:

- Dedicate a private work location that is designated for business purposes only.
- Use surge protectors.
- Install sufficient lighting.
- Office chair and desk are ergonomically suitable.
- Space is free from electrical hazards.
- Space is free of fall hazards.

In the event of a work-related illness or injury, remote employees/contractors should follow normal incident reporting procedures.

Security and confidentiality

Like all Cranbrook Loans Group, Inc.'s employees/contractors, remote employees/contractors are expected to take proper measures to ensure the protection of company data, proprietary information, and assets by following the below remote requirements.

- Remote employees/contractors must adhere to all Cranbrook Loans Group, Inc. policies and procedures, including, but not limited to, the company's Information Security Policy.
- All equipment must be password protected and must follow Cranbrook Loans Group, Inc.'s policy regarding updating passwords.
- Remote employees/contractors will not retain customer documentation in paper form and will not keep any non-public information on their laptop. Information will be uploaded to the company Loan Origination System or cloud service.
- Remote employees/contractors are prohibited from using any public Wi-Fi.
- Remote employees/contractors will not download any non-approved applications on their laptop.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- If a remote employee/contractor suspects any suspicious activity on their laptop, they will immediately log out of their computer, unplug the computer, and contact senior management.
- No in-person customer interaction occurs at an employee's or contractor's residence, unless such residence is an approved office.
- Customer interactions and conversations about consumers comply with federal and state information security requirements, including applicable provisions under the Gramm-Leach-Bliley Act and the Safeguards Rule established by the Federal Trade Commission, set forth at 16 C.F.R. Part 314, as such requirements may be amended from time to time.
- Employee/contractor working at a remote location access Cranbrook Loans Group, Inc.'s secure systems directly from an out-of-office device, including a laptop, phone, desktop computer, or tablet, via a virtual private network (VPN) or comparable system that ensures secure connectivity and requires a password or other forms of authentication to access.
- Cranbrook Loans Group, Inc. ensures that appropriate security updates, patches, or other alterations to the security of all devices used at remote locations are installed and maintained.
- Cranbrook Loans Group, Inc. has the ability to remotely lock or erase company-related contents of any device or otherwise remotely limit access to a licensee's secure systems.

The NMLS record of an MLO working from a remote location designates the principal place of business as the MLO's registered location, unless such MLO elects an office as a registered location.

Annual Compliance Inspection

For those remote originators of Cranbrook Loans Group, Inc., the company will conduct annual inspections of the originator's home to ensure compliance listed within this policy. Either an annual physical or a live video inspection will be conducted. All participants must be able to see and hear each other throughout the inspection.

Compensation

No changes will be made to an employee/contractor's base compensation if they work remotely, regardless of their location.

Consequences

Failure to fulfill work requirements or adhere to policies and procedures while working remotely may result in termination.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Specific Policies Related to Managing Remote Employees

The individual will only represent the business located at a location which is on file with the State and by which he/she is employed and under supervision.

The supervisor(s) have regular contact with the MLOs. Additionally, our loan origination software is web based. Activity is monitored on a regular basis.

The individual will only engage in business under the name of Cranbrook Loans Group, Inc..

Cranbrook Loans Group, Inc. has requirements for the way MLOs present themselves to the public: The individual will only provide letterhead, phone numbers, electronic e-mail addresses or other forms of communication that are in the name of, under control of, and provided by Cranbrook Loans Group, Inc..

The individual will only engage in activities and transactions related to the making of loans subject to the supervision and oversight of Cranbrook Loans Group, Inc..

Cranbrook Loans Group, Inc. maintains records of each MLO transaction.

Home Mortgage Disclosure Act (HMDA)

Overview

HMDA covers both residential and commercial loans, including multi-family dwellings and requires lenders to collect certain information on all applications for home purchase, home improvement, and refinancing.

HMDA's purposes are:

1. To help determine whether financial institutions are serving the housing needs of their communities.
2. To assist public officials in distributing public sector investment so as to attract private investment to areas where it is needed.
3. To assist in identifying possible discriminatory lending patterns and enforcing anti-discrimination statutes.

Examples of information required: type of loan, purpose, application date, loan amount, action taken, race or national origin, sex, income of the borrower, etc.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Regulatory Requirements

HMDA data is reported on the HMDA Loan Application Register ("LAR") and consists of loan level data points in addition to a HMDA Transmittal which contains information about the financial institution.

Financial institutions must meet certain reporting criteria before they are required to complete a LAR. As of January 1, 2022, the loan-volume thresholds are 100 closed-end mortgage loans in each of the two preceding calendar years and 200 open-end lines of credit in each of the two preceding calendar years.

HMDA requires covered institutions to collect, report and disclose information about their mortgage applications, originations, purchases, and pre-approvals. An application or loan is reported if it falls into one or more of the following categories:

- Home Purchase
- Home Improvement
- Refinance
- Cash-out Refinance
- Other (to be used for consumer purpose transactions with a purpose other than home purchase, home improvement, refinancing, or cash-out refinancing).

Covered institutions must submit the LARs for their institution to the CFPB in a consolidated report annually by March 1st following the calendar year of the data. Regulation C requires a covered institution to record a transaction on the LAR within thirty (30) calendar days after the end of the calendar quarter in which final action on the transaction is taken. Regulators may require covered institutions to record the data more frequently than Regulation C requires.

Institutions must make their LAR data (modified to protect privacy interest of consumers and borrowers) available to the public upon request in electronic or printed form. A modified register must be available no later than March 31st for requests made on or before March 1st following the year to which the data relate, and within thirty (30) days for requests made after March 1st. The modified register must continue to be made available to the public for three (3) years.

Using data from each institution's LAR, the Federal Financial Institutions Examination Council ("FFIEC") will prepare and post to the Internet a series of tables that will comprise the institution's disclosure statement. A covered institution must make the statement available to the public for inspection and copying at its home office in printed or electronic form within three (3) business days of the disclosure statement's posting to the Internet. In addition, if an institution has branch offices in other MSAs, it must make available an MSA-specific disclosure in one of two ways: by making the statement available in at least one branch office in every MSA other than the MSA of the home office, within ten business days of receipt from the FFIEC; or by posting an address for

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

requesting copies in the lobby of every branch office in an MSA (other than branches in the MSA of the home office) and responding to written requests within fifteen (15) calendar days.

The disclosure statement must remain available to the public for five (5) years, and an institution must post a notice about its availability in the lobby of its home office and each branch office located in an MSA.

Resubmission

If, upon external audit or examination by a regulatory authority, Cranbrook Loans Group, Inc.'s sample LAR is found to contain a certain number of errors exceeding the CFPB's Resubmission Thresholds Cranbrook Loans Group, Inc. will correct and resubmit its data.

Currently for institutions that have a total of less than 100,000 loans or applications on their annual LAR:

- Cranbrook Loans Group, Inc. must correct and resubmit its entire LAR if 10% or more or of the entries in the sample contain errors, and
- Cranbrook Loans Group, Inc. must correct and resubmit an individual data field in the LAR if there are errors in that field with 5% or more of the entries in the sample.

Cranbrook Loans Group, Inc. can be required to correct and resubmit data even if the 10% or 5% thresholds are not reached if the errors would make analysis of the data unreliable.

Procedures

Cranbrook Loans Group, Inc. designates Michael Ayoub as the HMDA Compliance Director. The HMDA Compliance Director will be responsible for implementing Cranbrook Loans Group, Inc.'s Policies and Procedures. The HMDA Compliance Director will also be responsible for overseeing the data entry and updates for Cranbrook Loans Group, Inc.'s HMDA reporting (if applicable).

Cranbrook Loans Group, Inc. is a mortgage broker and/or non-delegated correspondent company. We do not make credit decisions on our loans but rely on the expertise of our credit lenders. When multiple creditors exist on a transaction, generally the financial institution making the credit decision reports the loan to HMDA and not the mortgage broker/ non-delegated correspondent. Accordingly, Cranbrook Loans Group, Inc. generally does not report HMDA data but has established these procedures to facilitate the accurate collection and transfer of data to the investor/credit lender.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Cranbrook Loans Group, Inc., if required to submit HMDA data, will maintain a reporting system which is commensurate with our size and volume.

These procedures will be reviewed annually by the HMDA Compliance Director to ensure continuing compliance with the regulatory framework.

Cranbrook Loans Group, Inc., if required to submit HMDA data, will implement internal, pre-submission HMDA audits quarterly to test for and evaluate reported data accuracy. These audits will include transactional analysis of the data to be reported, written reports reflecting the findings of the audit and recommendations for corrective actions, if needed. The HMDA Compliance Director will be responsible for overseeing the internal audits.

Cranbrook Loans Group, Inc., if required to submit HMDA data, will undertake prompt corrective action in response to previously identified deficiencies in its HMDA and Regulation C compliance procedures.

Corrective actions include, but are not limited to:

- Providing personnel with more HMDA Regulation C training.
- Improving internal controls over the reporting process.
- Increasing the frequency of pre-submission internal data audits; and/or
- Appointing additional Compliance Director to assist in ensuring accurate reporting.

Cranbrook Loans Group, Inc. will provide, at a minimum, annual training to its employees/contractors on HMDA and Regulation C reporting requirements. Employees/contractors will be required to sign and date a Certificate of Completion for Cranbrook Loans Group, Inc. HMDA training.

MLOs

The HMDA Compliance Director and senior management will further remain abreast and informed of regulatory changes that may have occurred since prior examinations and/or prior data collection and reporting cycles (if required to submit HMDA data). The HMDA Compliance Director will provide senior management with updates on the HMDA regulatory framework.

MLOs employed by Cranbrook Loans Group, Inc. must be familiar with data collection requirements, particularly consumer demographic information:

- MLO must ask the consumer for this information.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- MLO must inform the consumer that federal law requires this information to be collected to protect consumers and to monitor compliance with federal statutes that prohibit discrimination against consumers on these bases.
- MLO cannot require the consumer to provide this information.
- If the application is taken 'in person' MLO must note the ethnicity, race, and sex based on visual observation or surname. 'In person' includes electronic media with a video component.
- MLO must note that the ethnicity/race/sex was collected based on visual observation or surname (individual indicators exist for ethnicity, race, and sex).
- MLO must Inform the consumer that if the information is not provided where the application is taken in person, MLO is required to note the information based on visual observation or surname.
- If the consumer begins an application by mail, internet, or telephone, and does not provide the requested information on the application but does not check or select the "I do not wish to provide this information" box on the application, and the consumer meets in person with the MLO to complete the application, MLO must request the consumer's ethnicity, race, and sex.

Any questions about the requirements to collect this data should be directed to the Compliance Director.

Quality Control Plan

Overview

Mortgage brokers, correspondents, and lenders must have established quality control and compliance procedures in order to abide by the expectations of government agencies, secondary market investors, and to ensure that the integrity of their lending operation is not compromised. However, the quality control process of a wholesale lender, a mortgage broker, and a non-delegated correspondent lender differs. Mortgage brokers and non-delegated correspondent lenders do not make underwriting decisions but must still participate in the quality control review of loans they originate. Any deficiencies, errors, or fraud discovered in a quality control review must be addressed by all parties.

As a mortgage broker and non-delegated correspondent lender, many elements of a standard quality control plan do not pertain to our operations. Therefore, this quality control plan evaluates Cranbrook Loans Group, Inc.'s origination and processing functions by performing both pre- and post-closing reviews that are conducted by an employee or by an outside firm specializing in mortgage quality control reviews. This quality control plan is designed to monitor internal components of the organization to

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

ensure quality standards when originating a loan. Cranbrook Loans Group, Inc. guards against errors, omissions, and fraud by training all staff to follow company procedures and the law.

A successful quality control program will reduce loan repurchases and defaults by identifying possible areas of deficiency, including errors and omissions, unacceptable patterns or trends, as well as fraud and intentional violations of regulations. When the quality control program does identify an issue, prompt, appropriate, corrective action is initiated. This can include addressing the issue with those involved and providing additional training to ensure that the same mistake is not made again, or by others. The goal of the quality control program is to ensure quality loan originations by the company, not to discipline staff. In addition, we strive to achieve 100% compliance with state and federal requirements.

Objective

The objective of our quality control plan is to ensure that all loans originated by Cranbrook Loans Group, Inc. are of a quality acceptable to our lending partners, clearly document all the conditions required to close the loan, and are in compliance with applicable state and federal laws. Quality control reviews will be independent. They will not be conducted by the originator or underwriter. A pre-close review is completed on all loan files prior to loan submission. Recommended corrections and/or revisions are communicated to operations and loan production staff, so that any changes can be made before sending the loan to a lender. Additional reviews occur as the loan progresses to closing, ensuring complete and accurate information is provided to the lender. It is critical that Cranbrook Loans Group, Inc. engage in a comprehensive review of each transaction prior to closing to ensure the borrower in not overcharged, and the file contains all necessary documentation.

Pre-Close Reviews

As part of our pre-close processes, information and documentation related to a loan file are reviewed to ensure a complete and accurate submission is made to the lender. The following aspects of the loan origination process are verified that they have been properly completed:

- Data is accurate and supported with documentation in the loan file.
- All required initial state and federal disclosures include all required content, have been provided timely, are signed by all required parties, and retained in the loan file with evidence of the date of delivery.
- Fees disclosed to the borrower are made in good faith with the best information available at the time of disclosure.
- All fee changes are documented with a valid change of circumstance and retained in the loan file with a copy of the revised disclosure.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- All information/documentation has been provided to the underwriter to clear all conditions.
- The borrower's ability to repay the loan has been properly calculated and supported with appropriate documentation, as outlined by Regulation Z.
- The identity of the borrower(s) has been verified and documented, including retaining a copy of their driver's license or ID, recording their social security number.
- The MLO was properly licensed at the time he/she originated the loan.

In addition, anyone completing any phase of a pre-close review should always keep an eye out for any suspicious information or documentation that may indicate potential fraud or wrongdoing. Concerns should be addressed following the procedures established for reporting suspicious activity internally.

Post-Close Reviews

Not all that different from our pre-close reviews, our post-close reviews aim to ensure that Cranbrook Loans Group, Inc. has originated quality loans that comply with the law and that can be demonstrated to a regulator. The selection criteria we use will ensure that well rounded sample of our activity is being reviewed, and at a minimum will cover at least 10 percent of our closed/funded loans. Post-close file reviews will occur monthly and will be completed within 60 days of the loan being selected for review. For example, a post-close review of March's activity must be made by the end of April, and the review must be completed by the end of May. Any reports generated will be provided to senior management within 30 days of the completed review, and no later than 120 days after the end of the month in which the loan closed.

The first step in a post-close review is to determine whether the complete loan file has been obtained from the lender. All states expect a mortgage company to retain its own records and not rely upon those investor partners to be the company's document retention center. Checklists can help accomplish this task; however, reviewers must think outside the box, as the documentation needed can vary from loan to loan.

It is important to remember that each loan file should document how the loan progressed from Point A, Application, to Point F, Final CD. This will include all documentation obtained from the borrower, the initial application and disclosures, everything that happened in the middle, and a signed final closing package. When reviewing the documents it is important to check the following:

- They were not issued with blanks, and contain all required information
- All documents are signed by those parties required, be it, borrowers, MLOs or others

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- The file contains appropriate evidence of the date of delivery of documents and disclosures
- There is no evidence of uncleared, red flags or other suspicious activity

Do not overlook those loans that do not make it to closing, as it is also important to retain complete loan files for denied and withdrawn applications. Cranbrook Loans Group, Inc. will need to be able to demonstrate its compliance with the timing requirements for decisioning loans per Regulation B. To do this, the date of application and denial or withdraw will need to be clearly documented in the LOS or loan file.

A post-close review will also include a review of the data to ensure it's accurate and supported with documentation in the loan file. Changes to fee amounts from LE to CD should be reviewed to ensure they are valid and supported with invoices and change of circumstance documentation, as necessary. All third-party fees should be supported with invoices.

Post-close reviews should ensure that the compensation paid to the company is in compliance with Regulation Z, by reviewing the following aspects related to pricing and compensation:

- The loan file contains the initial LE, any revised LEs, and a rate lock LE or pre-close CD, and the final CD.
- If the loan includes any discount points, the rate sheet or pricing information from the date the rate is locked is in the loan file.
- Any changes in compensation to the company are documented with a valid change of circumstance form and retained in the loan file.
- Review all reductions in company compensation to determine whether there is a tolerance cure applied. Also determine if this was applied to cover an unforeseen pricing increase.
- Ensure that all lender-paid compensation is supported with a current compensation agreement.
- Ensure that borrower-paid compensation is supported by a broker fee agreement, if required by the state.
- Ensure that the amount paid to Cranbrook Loans Group, Inc. is evidenced by either a copy of the check or wire received at closing.

It is equally important to review MLO compensation during a post-close review, as many state regulators find violations in this area during their examinations. Just like the company's compensation cannot vary once it's set, the same is true for the MLO's compensation. A post-close reviewer should ensure that the company can demonstrate the MLO's compensation was supported with a written compensation agreement. If the

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

agreement contains variables that impact the amount of compensation, those variables should also be documented.

For example, if the MLO's compensation can vary based upon lead or referral source, lender or borrower paid compensation, if the MLO used an assistant, or other allowable variations, those should be captured on a spreadsheet or other document that will allow the reviewer or a state regulator to replicate the calculation performed. Often just having a copy of the compensation agreement and MLO's paycheck will not be enough to demonstrate compliance. Performing reviews in this area can help a company spot any deficiencies that need to be corrected before being subject to a state examination.

Reverifications

As a mortgage broker and non-delegated correspondent lender many of the typical items that are reverified during a quality control review fall outside our role of responsibility and those reverifications are performed by the investor; this includes income, employment, credit reports and appraisals.

Additional Scrutinization Required

If at any time Cranbrook Loans Group, Inc. is made aware that any loan the company has originated has entered into early payment default, contains fraud, or is required to be repurchased, additional scrutinization of loans originated by that MLOs and/or branch will occur. This may require reverification of information that the company would not normally pursue.

Documenting Pre- and Post-Close Reviews

Because the quality control reviews are more a part of our origination process, rather than a separate review, formal quality control reports are not generated. Any issues are immediately addressed and may be documented in emails that have been sent to clear up any issues before submission or closing. Cranbrook Loans Group, Inc. may use checklists or other documents to help complete the reviews. Any documentation used or generated to complete a review will be retained in compliance with state or federal law.

Additional Compliance Reviews

In addition to loan file reviews, Cranbrook Loans Group, Inc. must complete reviews of business systems, processes, and functions to ensure all are operating as expected and in compliance with applicable laws and regulations. The frequency in which these should be completed can vary based upon the risks posed and results of prior reviews of these areas. The goal is to not burden the company with compliance reviews, but

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

rather to provide Senior Management with information to better understand how well the company is performing in various operations/areas.

Branch or Remote Work Location Audits

If Cranbrook Loans Group, Inc. has branches or employees/contractors that work remotely, each year the company should complete a review of the location to ensure that it remains in compliance with any state or federal laws. The review should ensure that, if required, it is licensed, managed by a licensed person or qualified individual. There should also be a review of compliance with information security procedures. Additional elements of the audit will vary depending on the makeup of the branch or remote work location. The results of the audit should be documented and provided to Senior Management.

Quarterly Review of the Loan Origination System

When completing quarterly mortgage call reports, Cranbrook Loans Group, Inc. should review its LOS to ensure it is maintained and updated with complete and correct information prior to filing the reports. Taking this step will help ensure the reports submitted by the company are accurate and can be verified during a state compliance examination.

Consumer Complaints

While Cranbrook Loans Group, Inc. always strives to provide the best service possible while originating loans that meet the needs of our clients, but from time to time, something may occur that causes a consumer to complain. At least annually, Senior Management should review the consumer complaint response process to ensure that any complaints were handled appropriately by thoroughly responding to the consumer's concerns in a timely manner. Any deviations from company policy should be addressed with those involved. Senior Management should consider if additional company-wide training should be provided.

Staff and Management Training

On an annual basis, Cranbrook Loans Group, Inc. should review the training practices of the company to ensure that its employees/contractors are completing the required training and the company is retaining appropriate records. Some federal regulations require topic-specific training, such as AML-BSA, and Information Security. In addition, state regulators will want to see evidence that everyone is appropriately trained for their role within the organization. This includes everyone from Senior Management to front-line workers. The training requirements must extend beyond the continuing education requirements to maintain an MLO license, as some staff members are not licensed and subject to continuing education. Individuals holding specific roles, such as AML Compliance Director, or Information Security Director are required to take additional

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

training to ensure they can function successfully in the role. An annual training review should encompass the following elements:

- Evidence of the topics covered
- Who provided the training, method of delivery, and date it occurred
- Who attended the training
- Records of any completion certificates or test results are maintained

By taking time to review this area each year, Cranbrook Loans Group, Inc. can have confidence that it has a properly trained team and the records to support it.

A robust quality control program within a mortgage company will help detect issues that need correction, reduce compliance risks, and ensure functional areas of operation are in compliance with state and federal law leading to quality loans being originated and the company's success.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Appendices

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Exhibit A - Employee/Contractor Suspicious Activity Notification

Loan Information:

Loan Number: _____
Borrower Name: _____
Subject Property Address: _____
Status:
____Application ____Processing ____Submittal ____Approved/Suspense/Denial
____Resubmittal

Suspects or Individual Involved:

Names of all suspects and individuals involved: (i.e., employee, real estate agent, attorney, appraiser, title agent, client, etc.)

_____ ID in file: Yes/No
_____ ID in file: Yes/No
_____ ID in file: Yes/No
_____ ID in file: Yes/No

Suspicious Activity:

Select the category (or categories) that best describe the suspicious activity:

___ Appears to involve funds derived from illegal activity or funds may be intended or conducted to hide or disguise funds or assets derived from illegal activity.
___ Appears a part, or all, of the transaction is deigned, whether through structuring or other means, to evade the requirements of the Bank Secrecy Act.
___ There does not appear to be a lawful purpose, and there is no reasonable explanation for the transaction after examining the available facts.

Describe what occurred and list supporting documentation:

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Attestation and Meeting Request:

Do you request a face-to-face meeting with the AML Compliance Director? Yes | No
Additional Comments:

_____

_____

_____

_____

By signing below, you attest that the statements on this notification are true and correct to the best of your knowledge.

Print your name: _____

Signature:_____

Date Submitted: _____

Submit this form to the AML Compliance Director.

*****FOR COMPLIANCE OFFICER USE ONLY*****

SAR Report Case #_____

List all staff members and individuals involved:

_____

_____

_____

_____

Description of follow up action taken:

_____

_____

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Disposition of case:

____ SAR filed Date Filed: _____
____ SAR not filed
____ activity determined to be normal
____ transaction below $5,000
____ other, explain:

Signature of AML Compliance Director ***Date***

Internal Controls:

____ Recorded on SAR Log
____ Appropriate staff notified (never disclose a SAR was filed/content)
____ Appropriate other interested parties notified (never disclose a SAR was filed/content)
____ Added to training, if applicable
____ Policy and Procedures updated, if applicable

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Exhibit B - Employee/Contractor Confidentiality Pledge

The company has adopted a financial privacy policy and an information security policy to preserve the confidentiality of non-public personal information about our customers as required by federal financial privacy laws and regulations. The Company also wishes to stress the need to maintain the confidentiality of information about the Company so that the Company may continue to operate for the betterment of its owners, employees/contractors, and customers. Each employee/contractor is therefore required to acknowledge and agree to the following Employee/contractor Confidentiality Pledge:

Employee/contractor pledges not to disclose any Confidential Information, as defined herein, about the Company and its customers, either directly or indirectly, to any person, firm, or corporation, including other employees/contractors of the Company, without the express authorization of the President of the Company. Pursuant to federal laws and regulations, Confidential Information concerning customers and the Company must remain confidential for all time.

The term "Confidential Information" will mean any information, whether marked "confidential" or not, which (a) relates to any consumer who requests or who may request a mortgage loan from the Company, or (b) has been used, is used, or may be used in the future in connection with the business of the Company, including, but not limited to:

Systems and information designs.

- Accounting methodology.
- Vendors and settlement service providers whose services are utilized by the Company or by the Company's customers.
- Customer lists, lead lists, and other information concerning consumers.
- Loan officer, processor and underwriter notes, title and mortgage information, applications for loans and title insurance taken or received (whether complete or incomplete), loan and title commitments, loan and closing documents, and other information supporting real estate transactions, mortgage loans, and title insurance policies.
- Files pertaining to mortgage loans in the process of being underwritten for credit or title insurance, and closed loan files.
- Marketing techniques.

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors. Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

- Proposed developments.
- Information regarding relationships with other entities involved in the company's business, including but not limited to, real estate brokers, appraisers, credit bureaus, title insurance companies and agencies, mortgage lenders and brokers, creditors, commercial lenders, and surveyors; and
- Information about any employee/contractor concerning salary or other personnel matters.

The undersigned employee/contractor agrees to abide by this Confidentiality Pledge.

_____ _____

Employee Date

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.

Exhibit C - Employee Compliance Manual Certification

COMPLIANCE MANUAL CERTIFICATION

I, _____ certify that I have read, understand, and will follow all Cranbrook Loans Group, Inc. policies and procedures. I understand that if I have questions, at any time, regarding mortgage compliance, I will consult with my immediate supervisor or the Compliance Director.

_____
Type or Print Name

_____ _____
Employee/Contractor Signature Date

This document is confidential and is intended for internal use only. You may not use, reproduce, or transmit this work, in any form or by any means, to any party outside of Cranbrook Loans Group, Inc., its regulators or investors.
Copyright MSource Training & Consulting, Inc. All rights reserved. Revision July 2026.