OPTIMUM FIRST MORTGAGE

Built for our team. Built for our borrowers.

EMPLOYEE HANDBOOK

2026 EDITION

◆ ◆ ◆

Optimum First Inc. DBA Optimum First Mortgage
7755 Center Avenue, 9th Floor, Huntington Beach, CA 92647
(877) 816-7846 · www.optimumfirst.com · NMLS #240415
Human Resources · hr@optimumfirst.com · (949) 216-6841 ext. 296

Effective 2026
Confidential · Internal Use Only

Table of Contents

Use this Table of Contents to navigate the handbook. Page numbers refer to the printed PDF version.

1. Introduction 3
2. Equal Employment Opportunity & Anti-Harassment 4
3. General Employment Policies 6
4. Compensation, Timekeeping & Pay 10
5. Time Off & Leaves of Absence 13
6. Standards of Conduct 19
7. Health, Safety & Workplace Violence Prevention 21
8. Technology, Communication & Privacy 23
9. Mortgage Industry Compliance 25
10. Training, Development & Required Notices 26
Acknowledgment of Receipt 27

1. Introduction

1.1 Welcome Message

Welcome to Optimum First Mortgage.

We are truly excited to have you join our team. At Optimum First Mortgage, we believe that our people are the foundation of everything we do. Every loan we close, every borrower we serve, and every relationship we build is a direct reflection of the dedication, character, and professionalism of our team.

Our mission is simple—but meaningful: to deliver exceptional service to our borrowers while fostering an environment where our team members can grow, succeed, and take pride in their work. We are committed to doing business the right way, with integrity, accountability, and respect at the center of every decision we make. That commitment is not just a standard—it is part of who we are.

No matter your role, your contribution matters. The experience we create for our clients is built step by step by each person in this organization. We encourage you to take ownership of your work, support your teammates, and continually look for ways to improve both yourself and the company as a whole.

This handbook is designed to provide you with the policies, guidelines, and resources to help you succeed here. Please take the time to review it carefully, and don't hesitate to reach out to your manager or our Human Resources team with any questions.

We are proud to have you with us and look forward to the impact you will make.

Sincerely,

Matthew Dohman/CEO & Robert Drenk/COO

Optimum First Mortgage

1.2 Handbook Disclaimer

This handbook supersedes any prior handbook, policy, or practice. It is a general guide. It is not a contract of employment and does not create any promise of continued employment, any specific term of employment, or any specific procedure that must be followed before discipline or termination.

Employment with Optimum First Mortgage is at-will. Either the employee or the Company may end the employment relationship at any time, with or without cause and with or without advance notice. Only the President may modify the at-will status, and only in a written agreement signed by both the President and the employee.

The Company may interpret, modify, suspend, or cancel any policy, practice, or benefit described in this handbook at any time, with or without notice, except for the at-will employment policy.

1.3 Changes in Policy

The Company reserves the right to revise, supplement, or rescind any policies or any portion of the handbook from time to time as the Company deems appropriate, in its sole and absolute discretion. The only exception is the policy of at-will employment, which may only be changed as described in Section 1.2.

Employees will be notified of material changes. Any employee who is unclear on a policy or procedure should consult Human Resources.

1.4 Company Values

We hold ourselves to the following commitments:

- Treat every employee, borrower, and partner with respect and fairness.
- Do the right thing for the borrower, the regulator, and each other — every time.
- Communicate openly. Encourage questions, ideas, and good-faith concerns.
- Invest in training so every employee can succeed in their role.
- Earn trust through consistent quality and full regulatory compliance.

2. Equal Employment Opportunity & Anti-Harassment

2.1 Equal Employment Opportunity

Optimum First Mortgage is an Equal Opportunity Employer. We base employment decisions on qualifications and the ability to perform the essential functions of a job. We do not discriminate in any aspect of employment on the basis of race, color, religion (including religious dress and grooming practices), creed, sex, gender, gender identity, gender expression, sexual orientation, pregnancy, childbirth, breastfeeding or related medical conditions, reproductive health decision-making, national origin, ancestry, immigration status, citizenship, age (40 and over), disability (mental and physical), genetic information, marital status, registered domestic partner status, medical condition, military or veteran status, political affiliation, status as a victim of domestic violence, sexual assault or stalking, traits historically associated with race (including hair texture and protective hairstyles such as braids, locks, and twists), or any other basis protected by federal, state, or local law.

This policy applies to recruitment, hiring, training, promotion, compensation, benefits, transfers, layoff, return from layoff, discipline, termination, and all other terms and conditions of employment.

The Company provides reasonable accommodations to qualified individuals with disabilities, for sincerely held religious beliefs, for pregnancy and related conditions, and as otherwise required by law, unless doing so would create an undue hardship. Employees who need an accommodation should contact Human Resources.

2.2 Anti-Harassment, Anti-Discrimination, and Anti-Retaliation

The Company is committed to a workplace free of unlawful harassment, discrimination, and retaliation. Conduct that violates this policy is prohibited whether it occurs on Company premises, at a Company-sponsored event, on a business trip, or while conducting Company business off-site or remotely.

What is prohibited

Prohibited conduct includes harassment based on any characteristic listed in Section 2.1. Sexual harassment includes, but is not limited to:

- Unwelcome sexual advances, requests for sexual favors, or other verbal, visual, or physical conduct of a sexual nature.
- Conditioning any employment benefit (or threatening to take adverse action) based on submission to or rejection of sexual conduct.
- Verbal conduct: sexual jokes, slurs, comments about an individual's body, sexually explicit emails, texts, or voicemails.
- Visual conduct: leering, suggestive or obscene messages, posters, cartoons, drawings, or gestures.
- Physical conduct: touching, assault, blocking movement, or otherwise interfering with normal work.
- Retaliation for opposing harassment or for participating in any investigation or proceeding.

This policy applies regardless of the gender, gender identity, gender expression, or sexual orientation of those involved.

How to report

Employees who experience or witness conduct they believe violates this policy should report it as soon as possible. There is no requirement to report to your manager first. Reports may be made to:

- Your direct manager
- Human Resources, Human Resources Manager — (949) 216-6841 ext. 296 — hr@optimumfirst.com

Employees may also file an external complaint with the California Civil Rights Department (CRD) at calcivilrights.ca.gov or 1-800-884-1684, or with the U.S. Equal Employment Opportunity Commission (EEOC) at eeoc.gov. The CRD requires complaints within three (3) years of the conduct; the EEOC generally requires complaints within 300 days.

Investigation

The Company will conduct a timely, impartial, and thorough investigation by qualified personnel. Confidentiality will be maintained to the extent practical and consistent with conducting a fair investigation. The Company will document the investigation and communicate the outcome to the complainant and respondent.

Anti-retaliation

The Company strictly prohibits retaliation against anyone who in good faith reports harassment, discrimination, or other unlawful conduct, or who participates in an investigation. Anyone found to have engaged in prohibited conduct or retaliation will be subject to discipline, up to and including termination.

2.3 Whistleblower Protection

Consistent with California Labor Code §1102.5, federal law, and our commitment to integrity, the Company prohibits retaliation against any employee who:

- Reports, in good faith, a suspected violation of any state or federal law or regulation.
- Reports concerns about accounting, internal controls, fraud, or auditing matters.
- Refuses to participate in an activity the employee reasonably believes is unlawful.
- Provides information or testimony in an investigation or proceeding.
- Discusses wages, working conditions, or other concerns protected by the NLRA.

Employees should report concerns to their manager or Human Resources. Concerns about senior leadership or about Human Resources may be reported directly to the President. Anonymous reports may be submitted in writing to HR.

2.4 Reasonable Accommodation Procedure

The Company engages in a timely, good-faith interactive process to identify reasonable accommodations for employees and applicants with disabilities, pregnancy-related conditions, sincerely held religious beliefs and practices, and other situations protected by law.

Employees who needs an accommodation should contact Human Resources as soon as the need becomes known. The Company will work with the employee to understand the request and identify appropriate options.

Employees are expected to cooperate in the interactive process, including providing timely responses and any supporting documentation as permitted by law. Failure to participate or delays in providing requested information may impact the Company’s ability to move forward with the request.

The Company will evaluate each request on a case-by-case basis. While the Company will make reasonable efforts to provide accommodation, not all requests may be granted, particularly if the accommodation would create an undue hardship or does not meet legal requirements.

The Company will communicate decisions and next steps to the employee once the review process is complete.

2.5 Lactation Accommodation

The Company provides reasonable break time and a private location for employees to express breast milk in accordance with California law.

Employees who need lactation accommodation should notify Human Resources or their manager. The Company will respond promptly and work with the employee to provide an appropriate accommodation.

The lactation space will be private, not a bathroom, and shielded from view and free from intrusion. It will include a place to sit, a surface for personal items, and access to electricity.

Employees may take reasonable break time as needed. When possible, lactation breaks should run concurrently with existing meal and rest breaks. Additional break time may be unpaid.

Employees have the right to request lactation accommodation without fear of retaliation or discrimination. If the Company is unable to provide a compliant space, the Company will provide a written response.

Employees who believe their rights under this policy have been violated may contact Human Resources or file a complaint with the California Labor Commissioner.

This policy is provided to employees at the time of hire, when an employee inquires about parental leave, and upon return from parental leave.

3. General Employment Policies

3.1 Immigration Law Compliance (I-9 / E-Verify)

The Company employs only individuals who are authorized to work in the United States and complies with all applicable federal immigration laws. The Company does not unlawfully discriminate on the basis of citizenship, immigration status, or national origin.

All employees are required to complete Form I-9 and provide valid documentation verifying identity and work authorization on or before the third business day of employment. Failure to provide the required documentation within the required timeframe may result in termination of employment.

Former employees who are rehired must complete a new Form I-9 unless a valid and compliant I-9 is already on file and re-verification is not required. The Company will reverify employment authorization as required by law.

The Company participates in the federal E-Verify program. After completion of the Form I-9, employee information is submitted to the Social Security Administration and, if necessary, the Department of Homeland Security to confirm employment eligibility. Participation in E-Verify does not replace the requirement to complete Form I-9.

Required E-Verify notices are posted at Company worksites as required by law

3.2 Employment Classifications

Employees are classified as exempt or non-exempt for wage and hour purposes:

- Non-exempt employees are entitled to overtime pay in accordance with federal and California law.
- Exempt employees are paid on a salary basis and must meet applicable salary and duties tests under federal and California law. Exempt employees are not eligible for overtime compensation.

Employees are also categorized as:

- Full-time: regularly scheduled to work 40 or more hours per week.
- Part-time: regularly scheduled to work fewer than 30 hours per week.

- Temporary: hired for a specific project or limited duration; not eligible for benefit programs unless required by law.

Eligibility for benefits depends on classification and the terms of the applicable benefit plan.

3.3 Background Checks

Employment is contingent upon the successful completion of required background checks conducted post-offer. These checks include, but are not limited to, a Social Security trace, national criminal search, sex offender registry search, and global watch list search. Additional screenings may be conducted as required for licensing under the SAFE Act and Nationwide Multistate Licensing System (NMLS), if applicable.

All background checks are conducted in compliance with the federal Fair Credit Reporting Act (FCRA), the California Investigative Consumer Reporting Agencies Act (ICRAA), and the California Consumer Credit Reporting Agencies Act (CCRAA). Applicants and employees will receive all required disclosures and authorizations prior to the background check, and copies of reports and notices will be provided as required by law.

3.4 Licensing and Certification

Employees whose duties require federal, state, or agency licensing must keep their licenses and certifications current at all times. Mortgage Loan Originators (MLOs) must hold a valid NMLS license and complete required continuing education. Failure to maintain a required license is grounds for reassignment, suspension, or termination. See Section 9 for the mortgage compliance overview.

3.5 Conflict of Interest

Employees must avoid actual or apparent conflicts of interest. Examples include:

- Using Company position, information, or resources for personal benefit or for the benefit of family or friends.
- Holding a financial interest in a competitor, vendor, or counterparty without disclosure.
- Steering borrowers to a particular service provider in exchange for any benefit.
- Outside employment that interferes with the employee's duties or competes with the Company.

Employees must disclose potential conflicts to Human Resources or their manager. This policy does not restrict an employee's right to discuss or act together to improve wages, benefits, and working conditions under the National Labor Relations Act.

3.6 Outside Employment

Employees may hold outside employment provided it does not interfere with their job duties, create a conflict of interest, compromise borrower confidentiality, or violate any licensing or compensation regulation (including the Loan Originator Compensation rule under Regulation Z).

3.7 Personnel Data Changes

Employees are responsible for ensuring their personal information is accurate and up to date in ADP. Updates should be made as soon as changes occur.

This includes, but is not limited to:

- Legal name and preferred name
- Mailing address
- Phone numbers
- Emergency contacts
- Tax withholding (W-4 / DE-4)

- Direct deposit information
- Beneficiary designations
- Professional licenses and certifications

Failure to maintain accurate and current information may result in delays or issues related to payroll, benefits, tax reporting, or emergency notifications. The Company is not responsible for issues that arise due to outdated or incorrect information.

Employees who need assistance updating their information in ADP should contact Human Resources for support.

3.8 Access to Personnel Files

Under California law, current and former employees (and their authorized representatives) may inspect and receive a copy of their personnel records and any documents they signed relating to employment. Requests should be made in writing to Human Resources. The Company will provide access within 30 calendar days of the request (or 35 days if the request is by an authorized representative). Payroll records (Labor Code §226) will be made available within 21 calendar days of a written request.

Files may be inspected at a mutually agreeable time on Company premises or, at the Company's option, by providing a copy. Files relating to active criminal investigations and letters of reference are excluded by law.

3.9 Employee Privacy & CCPA / CPRA Notice at Collection

The Company complies with the California Consumer Privacy Act, as amended by the California Privacy Rights Act (together, "CCPA"). Since January 1, 2023, employees, applicants, contractors, and their household members are protected as "consumers" under CCPA. This Section serves as the Company's Notice at Collection. A separate written Notice at Collection is also provided to all employees and applicants at hire and is available from Human Resources on request.

Categories of personal information we collect

Depending on your role and the stage of your relationship with the Company, we may collect the following categories of personal information about you:

- Identifiers — name, alias, postal address, email, phone, Social Security number, driver's license, passport, signature, government ID numbers, online identifiers, IP address.
- Customer records (Cal. Civ. Code §1798.80(e)) — bank account, financial account, tax filings, medical information related to leave or benefits.
- Protected classifications — age, race, color, national origin, ancestry, citizenship, marital status, sex, gender, gender identity, sexual orientation, religion, disability, military / veteran status, genetic information, pregnancy.
- Commercial information — business expenses and reimbursements, benefits elections.
- Internet or other network activity — interactions with Company systems, applications, devices, and websites.
- Geolocation — location information from Company devices, badge / facility access records.
- Audio or visual information — photographs, video recordings (e.g., CCTV on Company premises), voicemail, training recordings.
- Professional or employment-related information — title, hire date, compensation, performance evaluations, disciplinary records, training records, NMLS license details.
- Education information — degree, transcripts, certifications.
- Inferences — characteristics, preferences, or abilities derived from the categories above to evaluate your suitability for your role.

- Sensitive personal information — Social Security number, driver's license / passport / state ID, financial account credentials, precise geolocation, racial or ethnic origin, religious beliefs, contents of mail / email / texts (where lawfully reviewed), genetic data, biometric data, health information, sex life / sexual orientation.

Sources of personal information

We collect personal information directly from you (your application, onboarding documents, ongoing communications), from third parties you authorize (former employers, references, schools, background-check vendors, NMLS), from benefit and payroll providers (such as ADP), from your use of Company systems and devices, from public records, and from monitoring of Company premises and equipment.

Business and commercial purposes for collection

We collect and use personal information for the following business purposes:

- Recruiting, evaluating, and onboarding employees and contractors.
- Administering the employment relationship — compensation, benefits, leaves of absence, retirement, performance management, training, and discipline.
- Complying with federal, state, and local law — including SAFE Act / NMLS licensing, Bank Secrecy Act, equal opportunity, wage-and-hour, payroll tax, immigration verification, and Cal/OSHA.
- Information security, fraud prevention, and protection of Company and borrower property.
- Maintaining business records and complying with audit, litigation, and regulatory requirements.
- Quality assurance, training, and operational improvement.

We do not use or disclose sensitive personal information for any purpose other than those permitted by Cal. Civ. Code §1798.121 and as necessary to perform the services described above.

Categories of third parties with whom we share personal information

- Service providers and contractors — payroll and timekeeping (ADP), benefits providers, retirement plan recordkeeper, background-check vendor, IT and security vendors, outside counsel and auditors.
- Government agencies — IRS, EDD, SSA, DHS, DFPI, NMLS, DOL, Cal/OSHA, and other agencies in response to lawful requirements, subpoenas, or court orders.
- Insurance carriers — for workers' compensation, group health, and liability matters.
- Successors in interest — in connection with a merger, acquisition, or reorganization, subject to confidentiality.

The Company does not sell employee personal information and does not share employee personal information for cross-context behavioral advertising, as those terms are defined under CCPA.

Data Retention

Personal information is retained for as long as needed to fulfill the purposes described above and to comply with the Company's Document Retention Policy and applicable legal, regulatory, tax, and litigation-hold requirements. Examples include I-9 records (the later of three years after hire or one year after termination), payroll records (at least four years), workers' compensation records, and other personnel records per the Company's retention schedule.

Your rights under CCPA / CPRA

- Right to know — request that we disclose the categories and specific pieces of personal information we have collected about you, the sources, the purposes, and the categories of third parties with whom we share it.
- Right to delete — request deletion of personal information, subject to legal and operational exceptions (e.g., tax, payroll, compliance, or litigation-hold requirements).

- Right to correct — request that we correct inaccurate personal information.
- Right to limit use of sensitive personal information — direct that we limit use of sensitive personal information to what is necessary to provide the services or perform our obligations.
- Right to non-discrimination — exercise your rights without retaliation or adverse action.

How to exercise your rights

To submit a request, contact Human Resources at hr@optimumfirst.com or (949) 216-6841 ext. 296. We may require you to verify your identity before processing your request. We will respond within the timeframes required by CCPA (generally 45 days, extendable by another 45 days for complex requests). You may also designate an authorized agent to make a request on your behalf; the Company may require proof of the agent's authority and direct verification of your identity.

3.10 Termination of Employment

Employment with the Company is at-will. Common circumstances of termination include resignation, dismissal, layoff, and retirement.

Employees who resign are asked to provide at least two (2) weeks of written notice, although the Company is not obligated to retain an employee through the notice period.

Final pay is provided as required by California law:

- Involuntary termination: all wages, including accrued unused vacation, are paid immediately at the time and place of separation.
- Voluntary resignation with at least 72 hours' notice: final pay is provided on the last day of work.
- Voluntary resignation with less than 72 hours' notice: final pay is provided within 72 hours of separation.

Separating employees must return all Company property, including keys, badges, computers, mobile devices, and any documents containing borrower or Company information. Continuation of group health coverage under COBRA / Cal-COBRA will be offered to eligible employees.

4. Compensation, Timekeeping & Pay

4.1 Pay Periods and Paydays

Employees are paid on a semi-monthly basis, with paydays on the 5th and 20th of each month.

If a scheduled payday falls on a weekend or holiday:

Saturday: employees will be paid on the preceding Friday

Sunday: employees will be paid on the preceding Monday

Holiday: employees will be paid on the preceding business day or as otherwise required by applicable law

Employees may access pay stubs, tax forms, and manage direct deposit information through ADP Workforce Now or the ADP Mobile app.

4.2 Direct Deposit

All employees are encouraged to elect direct deposit through the ADP self-service portal. Employees receive an itemized electronic wage statement each pay period through ADP. Itemized wage statements include the nine items required by Labor Code §226 (gross wages, total hours for non-exempt employees, deductions, net wages, pay period, employee name and last four of SSN/ID, employer name and address, and applicable hourly rates).

4.3 Timekeeping (Non-Exempt Employees)

Non-exempt employees must accurately record all hours worked using ADP Time & Attendance. This includes:

- Clock-in at the start of the shift and clock-out at the end of the shift.
- Start and end of each meal period.
- Any time spent on work-related communication outside of regular hours (e.g., responding to emails or calls).

Working off the clock is strictly prohibited. Falsifying time records — including punching for another employee — is grounds for immediate termination.

Employees must review and approve their time records at the end of each pay period. If a time-record error is discovered, the employee should notify their manager and Human Resources promptly so corrections can be made.

4.4 Overtime (California)

Non-exempt employees may not work overtime without prior written authorization from their manager. Even unauthorized overtime that is worked will be paid in accordance with California and federal law, but unauthorized overtime is grounds for discipline.

Overtime is paid at the following rates:

- 1.5x the regular rate for hours worked over 8 in a workday or over 40 in a workweek.
- 2x the regular rate for hours worked over 12 in a workday.
- 1.5x the regular rate for the first 8 hours worked on the seventh consecutive workday in a workweek.
- 2x the regular rate for hours worked over 8 on the seventh consecutive workday in a workweek.

4.5 Meal Periods (Non-Exempt Employees)

California law requires the Company to provide non-exempt employees with the following meal periods:

- An uninterrupted, duty-free 30-minute meal period to begin before the end of the 5th hour of work.
- A second 30-minute meal period to begin before the end of the 10th hour of work when an employee works more than 10 hours in a day.

Employees must record the start and end of each meal period in ADP using START MEAL and END MEAL. Punches must reflect the actual time the meal began and ended.

ADP system restriction

To support compliance, ADP prevents employees from clocking back in until a full 30 minutes have passed. This is designed to prevent shortened meal breaks, reduce missed or late lunches, avoid meal premiums, and maintain compliance with California law.

Meal premiums

A meal premium of one additional hour of pay at the employee's regular rate is automatically issued under Labor Code §226.7 when any of the following occurs:

- A meal break is missed.
- The meal break is taken late (begun after the end of the 5th hour).
- The meal break is less than 30 minutes.
- The meal break is interrupted.

Meal premiums are required by law and cannot be waived or removed.

Meal-period waivers

In limited circumstances, an employee and the Company may mutually agree in writing to waive a meal period:

- The first meal period may be waived if the total workday is no more than six hours.
- The second meal period may be waived if the total workday is no more than twelve hours and the first meal period was not waived.

Waivers must be in writing and may be revoked by the employee at any time.

Employee responsibilities

- Take your meal break before the end of the 5th hour.
- Take the full 30 minutes.
- Use START MEAL and END MEAL accurately in ADP.
- Notify a manager immediately if you are unable to take a timely meal break.

Repeated violations — including late lunches, early returns, or skipped meal breaks — may result in progressive discipline, up to and including termination.

Escalation Policy for Missed Punches or Timekeeping Violations

- 1st Violation: Email warning to employee.
- 2nd Violation: Email warning to employee and manager.
- 3rd Violation: Email to employee, manager, and Ruben.
- 4th Violation: Formal write-up and mandatory meeting with Robert or Matt.
- 5th Violation: Suspension and/or termination at management discretion.

4.6 Rest Periods (Non-Exempt Employees)

Non-exempt employees are entitled to paid rest periods based on the following schedule:

- One 10-minute rest period for shifts of 3.5 to 6 hours.
- Two 10-minute rest periods for shifts of more than 6 and up to 10 hours.
- Three 10-minute rest periods for shifts of more than 10 and up to 14 hours.

Rest periods should be taken in the middle of each work period where practicable. Employees must be relieved of all duty. Missed or interrupted rest periods entitle the employee to an additional hour of pay at the regular rate under Labor Code §226.7. Employees who are unable to take a rest period should notify their manager immediately.

4.7 Pay Transparency (SB 1162)

Consistent with California's pay transparency law, pay scales are included in internal and external job postings. Current employees may request the pay scale for their current position from Human Resources.

4.8 Payroll Deductions and Garnishments

Mandatory deductions include federal and California income tax withholding, Social Security, Medicare, and California State Disability Insurance (SDI). Voluntary deductions may include health insurance premiums, 401(k) contributions, and other authorized items.

The Company complies with court-ordered garnishments and other lawful wage withholding orders. The Company does not retaliate against any employee whose wages are subject to garnishment.

If you believe an improper deduction has been made from your pay, contact Human Resources immediately. We will investigate and, if appropriate, promptly reimburse the deduction.

4.9 Pay Corrections

The Company makes every effort to ensure correct pay. If you discover an error, contact Payroll immediately so corrections can be made in the next pay cycle or, in the case of underpayment, as required by law.

5. Time Off & Leaves of Absence

The following policies describe the leaves available to eligible employees. Where multiple leaves cover the same absence, leaves generally run concurrently to the extent permitted by law. Contact Human Resources before taking leave whenever possible.

5.1 Vacation Leave

Effective dates and transition

This Vacation Policy is a conversion of the Company's prior vacation policies. The effective dates are:

- New Hires: effective for all employees hired on or after March 16, 2026.
- Current Employees: replaces the existing vacation policy effective January 1, 2027.

Until January 1, 2027, current employees continue under the existing vacation policy. On January 1, 2027, all prior vacation policies are superseded in full.

Purpose

The Company provides Vacation Leave to eligible employees for vacation, personal matters, and other needs while complying with California law.

Eligibility

Vacation does not accrue during the first 90 days of employment. Beginning on the 90th day of continuous employment, eligible employees begin accruing vacation in the amount specified in their offer letter. Employees must be full-time to participate.

Accrual rates and caps

Vacation accrual rates and maximum accrual caps are based on employee classification and length of service, as outlined in the table below:

Classification	First Year Accrual	Post-Anniversary Accrual	Maximum Cap
Non-Exempt	2.67 hrs/pay period (48 hrs/yr)	3.33 hrs/pay period (80 hrs/yr)	144 hrs
Exempt / Managerial	4.44 hrs/pay period (80 hrs/yr)	4.66 hrs/pay period (112 hrs/yr)	180 hrs
Exempt / Director Level	5.33 hrs/pay period (96 hrs/yr)	6 hrs/pay period (144 hrs/yr)	216 hrs

Rollover and cap

Unused vacation will roll over from year to year. However, employees may not accrue more than one and one-half (1.5) times their applicable annual vacation accrual rate based on employee classification. Once an employee reaches the maximum balance, vacation will stop accruing until the balance falls below the applicable cap.

Usage

Vacation may be used for vacation, personal time, or other personal matters. Employees are required to submit vacation requests in advance whenever possible in their ADP portal. Vacation usage must be approved by the employee's supervisor and may be subject to scheduling and business needs.

Payout upon separation

In accordance with California law, all accrued but unused vacation hours will be paid to the employee upon separation of employment, whether voluntary or involuntary, at the employee's final rate of pay.

5.2 Paid Sick Leave

Frontload

The Company provides forty (40) hours of paid sick leave each year to eligible employees. Sick leave is frontloaded annually rather than accrued.

Eligibility

All employees — including full-time, part-time, and temporary — who work in California for the Company for 30 or more days within a year of hire are eligible. Employees become eligible to use sick leave after completing 90 days of employment, consistent with the California Healthy Workplaces, Healthy Families Act (as amended by SB 616).

Part-time employees receive sick leave on a pro-rated basis as required by California law. Specifically, part-time employees frontloaded with paid sick leave receive an amount that meets or exceeds the statutory minimum (5 days or 40 hours, whichever is greater).

Permitted uses

Sick leave may be used for:

- Diagnosis, care, or treatment of an existing health condition of the employee or a family member.
- Preventive care for the employee or a family member.
- Absences related to domestic violence, sexual assault, or stalking (including obtaining services, counseling, or safety planning).

Family member

Family member includes child, parent, spouse, registered domestic partner, grandparent, grandchild, sibling, parent-in-law, or a designated person (one per 12-month period) as permitted by California law.

Increments

Paid sick leave may be taken in minimum increments of two (2) hours.

Carryover and payout

Because the Company frontloads the full annual amount each year, unused sick leave does not carry over beyond the employee's anniversary date. Unused sick leave is not paid out upon separation, as permitted by California law.

Non-retaliation

The Company strictly prohibits retaliation against any employee for requesting or using paid sick leave.

5.3 Reproductive Loss Leave (SB 848)

Eligible employees may take up to five (5) days of reproductive loss leave following a failed adoption, failed surrogacy, miscarriage, stillbirth, or unsuccessful assisted reproduction. Up to twenty (20) days may be taken in a 12-month period in the event of multiple losses. Leave does not need to be taken consecutively but must be completed within three (3) months of the event.

To be eligible, an employee must have been employed for at least 30 days. Leave is unpaid; however, employees may use accrued paid time off (including vacation or, where applicable, sick leave) during the leave. The Company maintains confidentiality regarding any information related to the leave and prohibits retaliation against employees who request or use this leave.

5.4 Bereavement Leave

Eligible employees may take up to five (5) days of bereavement leave upon the death of a family member, defined as spouse, child, parent, sibling, grandparent, grandchild, domestic partner, or parent-in-law. Bereavement leave need not be consecutive but must be completed within three (3) months of the death.

Bereavement leave is unpaid; however, employees may use accrued paid time off for this purpose.

Employees must work for the Company for at least 30 days before the start of leave. The Company may request documentation (such as a death certificate, obituary, or other written verification) within 30 days of the first day of leave. All information will be kept confidential.

5.5 California Family Rights Act (CFRA)

Eligible employees may take up to 12 weeks of unpaid, job-protected leave in a 12-month period under CFRA.

Eligibility

- Employed by the Company for at least 12 months (need not be consecutive).
- Worked at least 1,250 hours during the 12 months preceding leave.

Reasons for leave

- For the birth of a child, including bonding within 12 months of birth.
- For placement of a child for adoption or foster care, within 12 months of placement.
- To care for a spouse, registered domestic partner, child (regardless of age or dependency status), child-in-law, parent, parent-in-law, grandparent, grandchild, sibling, or designated person with a serious health condition.
- For the employee's own serious health condition.
- For a qualifying exigency related to the covered active duty of a spouse, registered domestic partner, child, or parent in the Armed Forces.

Notice and certification

Employees must provide at least 30 days' advance notice when the need for leave is foreseeable, or as much notice as practicable. Medical certification supporting the need for leave is required.

Benefits and reinstatement

The Company maintains group health benefits during CFRA leave on the same terms as if the employee continued to work. Upon return from leave, the employee is generally reinstated to the same or a comparable position. CFRA leave generally runs concurrently with federal FMLA leave when both apply. Pregnancy Disability Leave (PDL) is separate from CFRA leave for bonding.

5.6 Pregnancy Disability Leave (PDL) & Accommodation

Employees disabled by pregnancy, childbirth, or a related medical condition may take up to four (4) months of leave per pregnancy. Leave may be taken intermittently or as a reduced work schedule as advised by a healthcare provider. PDL runs concurrently with federal FMLA (where applicable) but is separate from CFRA bonding leave.

Reasonable accommodations are available for employees affected by pregnancy and related conditions, including modified work duties, more frequent breaks, transfer to a less strenuous position, time off, and lactation accommodations. The Company maintains group health benefits during PDL on the same terms as if the employee continued to work. Upon return, the employee is reinstated to the same position unless legitimate business reasons unrelated to the leave make that impossible.

5.7 Paid Family Leave (State PFL Benefits)

California's Paid Family Leave program, administered by the Employment Development Department (EDD), provides up to eight (8) weeks of partial wage replacement within a 12-month period for employees who:

- Bond with a new child within the first year of birth, adoption, or foster placement.
- Care for a seriously ill family member.
- Address a qualifying military exigency.

Wage replacement is up to 70 to 90 percent of wages, depending on income, subject to the weekly maximum set by the EDD. There is no longer any requirement to use vacation or PTO before receiving PFL benefits (AB 2123, effective January 1, 2025).

PFL provides wage replacement only; job protection is provided separately under CFRA or other applicable law when the employee qualifies. Information is available from Human Resources or directly from the EDD at edd.ca.gov.

5.8 State Disability Insurance (SDI)

Employees who are unable to work due to a non-work-related illness, injury, or pregnancy may be eligible for State Disability Insurance benefits administered by the EDD. SDI is funded through employee payroll deductions. Information is available from Human Resources or at edd.ca.gov.

5.9 Workers' Compensation

All employees are covered by workers' compensation insurance for injuries and illnesses arising out of and in the course of employment. Report all work-related injuries — no matter how minor — to your manager immediately so a claim can be opened. Failure to report promptly may affect the claim.

5.10 Crime Victims Leave (AB 2499)

Effective January 1, 2025, eligible employees may take leave related to a qualifying act of violence against the employee or the employee's family member. Qualifying acts include domestic violence, sexual assault, stalking, and other crimes that cause physical injury, mental injury, or a threat of physical injury.

Leave may be used to:

- Obtain medical attention or psychological counseling.
- Seek services from a domestic violence shelter, victim services program, or counselor.
- Participate in safety planning, including relocation.
- Seek or obtain civil or criminal legal relief (e.g., a restraining order).
- Attend court or other legal proceedings related to the qualifying act.
- Care for an immediate family member who is the victim of a qualifying act.

Leave is unpaid; employees may use accrued paid time off or paid sick leave. The Company prohibits discrimination or retaliation against employees who are victims (or whose family members are victims) or who exercise rights under this policy. Where possible, employees should provide advance notice. Reasonable safety accommodations are also available upon request.

5.11 Military Leave (USERRA)

Employees who serve in the U.S. uniformed services are entitled to leave and reemployment rights under USERRA and California law. Employees must provide advance notice of military service whenever practicable. Continuation of group health coverage is available during leave subject to plan terms and applicable law.

5.12 Military Spouse Leave

Employees who are spouses of a member of the U.S. Armed Forces, National Guard, or Reserves who is on leave from deployment during a period of military conflict may take up to 10 days of unpaid leave. To be eligible, the employee must work an average of 20 or more hours per week.

5.13 Civil Air Patrol Leave

Employees who are members of the California Wing of the Civil Air Patrol may take up to 10 days of unpaid leave per year to respond to emergency operational missions. Eligibility requires at least 90 days of employment.

5.14 Volunteer Civil Service Leave

Employees who are volunteer firefighters, reserve peace officers, or emergency rescue personnel may take time off to perform emergency duty as well as up to 14 days per year of unpaid leave to attend required training.

5.15 Organ and Bone Marrow Donation Leave

- Up to 30 days of paid leave per year for organ donation.
- Up to 5 days of paid leave per year for bone marrow donation.

Eligibility requires 90 days of employment. Employees must provide reasonable advance written notice and physician verification.

5.16 Jury and Witness Duty Leave

Employees are allowed unpaid time off to serve on a jury or to attend or testify in a court proceeding. Exempt employees will be paid as required to comply with applicable wage and hour laws. Provide a copy of the summons or subpoena to your manager as soon as possible.

5.17 Voting Leave

Employees who do not have sufficient time outside of work to vote may take up to two (2) hours of paid time off to vote on Election Day. Time off should be at the beginning or end of the shift, whichever provides the most time for voting, unless mutually agreed otherwise. Provide at least two working days' notice.

5.18 School Activities and School Emergencies Leave

Eligible employees who are parents, guardians, stepparents, foster parents, grandparents, or those standing in loco parentis to a child in kindergarten through grade 12 (or in a licensed daycare facility) may take up to 40 hours of unpaid leave per year (not to exceed 8 hours in any one calendar month) for the following:

- Participation in school or daycare activities.
- Enrollment or re-enrollment of the child.
- Responding to a child-care or school emergency.
- Addressing the child's suspension.

Leave is unpaid; employees may use accrued paid time off. Reasonable advance notice is required when possible.

5.19 Holidays

The Company observes the following paid holidays. For 2026, the observed dates are:

Holiday	2026 Observed Date
New Year's Day	Thursday, January 1, 2026
Memorial Day	Monday, May 25, 2026

Independence Day	Friday, July 3, 2026
Labor Day	Monday, September 7, 2026
Thanksgiving Day	Thursday, November 26, 2026
Christmas Day	Friday, December 25, 2026

When a holiday falls on a Saturday, it is generally observed on the preceding Friday. When a holiday falls on a Sunday, it is generally observed on the following Monday. For years other than 2026, observed dates will be communicated annually.

5.20 401(k) Retirement Plan

The Company sponsors the Optimum First Inc 401(k) Profit Sharing Plan and Trust to help employees save for retirement. The plan is administered through ADP and is subject to the terms of the official plan document. If there is any conflict between this handbook and the plan document or Summary Plan Description (SPD), the plan document controls.

Eligibility

Employees are eligible to participate on the next plan entry date after meeting all of the following:

- Have reached 21 years of age.
- Have completed 12 months of service.
- Have completed at least 1,000 hours of service in those 12 months.

Employee Contributions

Eligible employees may contribute 1% to 90% of pay on a pre-tax and/or Roth (after-tax) basis each pay period, subject to IRS limits. Employees may also elect a flat dollar amount per pay period. Highly Compensated Employees may be subject to a lower contribution cap as required by IRS rules.

Catch-Up Contributions (Age 50+)

Employees who are age 50 or older by December 31 of the contribution year may make additional catch-up contributions above the regular IRS limit:

- Standard catch-up (age 50+): up to the IRS limit in effect for the year.
- Enhanced catch-up (ages 60–63): a higher catch-up limit applies, as set by the IRS each year.

Under the SECURE 2.0 Act, if you earned more than $145,000 (indexed) in Social Security wages from the Company in the prior year, any catch-up contribution you make must be made as a Roth (after-tax) contribution.

Employer Contributions

The Company may make discretionary profit-sharing contributions to the plan each year. Eligibility for, and the amount of, any employer contribution is determined in accordance with the plan document.

Vesting

Employee contributions and amounts you roll into the plan are 100% vested at all times. Discretionary employer profit-sharing contributions vest according to the following 6-year graded schedule:

Years of Service	0	1	2	3	4	5+
Vested %	0%	20%	40%	60%	80%	100%

Loans, Rollovers, and Withdrawals

- Rollovers: rollovers from prior qualified plans or IRAs are accepted, even before you meet the plan's age and service requirements.

- Loans: up to 3 outstanding loans at any time; minimum loan amount $500; maximum repayment period generally 5 years (longer for the purchase of a primary residence). Interest rate: Prime + 2%. A fee may apply.
- In-service withdrawals: generally available beginning at age 59½. Hardship and other special withdrawals are subject to plan rules.
- Required Minimum Distributions begin at the age set by IRS rules.

Enrollment and Account Management

The plan is not automatic — eligible employees must affirmatively elect to enroll. Once eligible, employees enroll, change contributions, review balances, name beneficiaries, and manage investments through the ADP retirement plan portal and the ADP Mobile Solutions app. Investment options include target-date funds and a self-directed lineup. Eligible employees may change their contribution or investments at any time.

Where to Get More Information

Complete plan details — including employer contribution formulas, fees, distribution options, and beneficiary procedures — are in the plan's Summary Plan Description (SPD) and 401(k) Plan Guide. Both are available from Human Resources and through the ADP portal.

5.21 Health Insurance and Other Benefits

The Company offers group health, dental, vision, and other benefits to eligible employees. Eligibility begins on the first day of the month following completion of the 60-day of employment. Plan details — including coverage tiers, premiums, and the network — are described in the SPD and benefits guide available through HR and the ADP self-service portal. Plan documents control over any summary description.

6. Standards of Conduct

6.1 General Standards of Conduct

All employees are expected to act professionally, ethically, and in compliance with the law. The following are examples of conduct that may result in discipline, up to and including termination:

- Theft, fraud, or misappropriation of Company, borrower, vendor, or coworker property.
- Falsifying records, including timekeeping, loan documents, or business records.
- Reporting to work impaired by, or using, possessing, or distributing alcohol or illegal drugs on Company premises or while on Company business.
- Workplace violence or threats — see Section 7.
- Discrimination, harassment, or retaliation in violation of Section 2.
- Insubordination or refusal to perform reasonable, lawful job duties.
- Unauthorized disclosure of confidential or non-public information.
- Negligence or improper conduct causing damage to property.
- Conduct that violates federal or state mortgage regulations or licensing requirements.
- Excessive absenteeism or tardiness without authorization.

This list is illustrative, not exhaustive. The Company reserves the right to determine appropriate discipline based on circumstances. This policy does not restrict any employee's rights under the National Labor Relations Act.

6.2 Disciplinary Process

Discipline is intended to correct behavior fairly and promptly. Depending on the nature and severity of the conduct, discipline may include verbal warning, written warning, performance improvement plan, suspension

(with or without pay), or termination. The Company reserves the right to skip steps and proceed to immediate termination for serious misconduct, including but not limited to violence, theft, falsification, breach of borrower confidentiality, gross insubordination, and serious safety violations.

6.3 Attendance and Punctuality

Regular attendance and punctuality are essential. Employees are expected to be at their workstation, ready to work, at their scheduled start time and to complete their full shift. All time off must be requested in writing in advance per the applicable leave policy.

Schedule changes — including leaving early or arriving late — must be approved in advance by your manager.

Expectations

- Be present and ready to work at your scheduled start time.
- Complete your full shift unless prior approval is obtained.
- Request any time off in writing and in advance per the Vacation and Sick Leave policies.
- Notify your manager immediately if illness or emergency prevents you from working as scheduled.

Consequences for non-compliance

- Verbal warning for first violation.
- Written warning for repeated violations.
- Further incidents may result in suspension or termination.

If an employee fails to notify their manager for three consecutive scheduled workdays, the Company may treat the absence as a voluntary resignation, subject to any extenuating circumstances and applicable leave laws.

6.4 Confidentiality

Employees must safeguard Company and borrower confidential information. Confidential Information includes (but is not limited to) borrower personal information (NPI), loan files, customer lists, pricing, business plans, vendor information, marketing strategies, financial data, trade secrets, software, and any other information that is not publicly available. Borrower NPI is also protected by the Gramm-Leach-Bliley Act (GLBA) — see Section 9.

Employees may not access, copy, share, or use Confidential Information except for legitimate business purposes consistent with their role. The duty of confidentiality continues after employment ends. Wages and other terms and conditions of employment are not Confidential Information.

6.5 Alcohol, Drugs, and Impairment at Work

The Company is committed to a safe workplace and a productive workforce. The Company does not conduct drug or alcohol testing of employees.

Prohibited on the job

- Reporting to work impaired by alcohol, cannabis, illegal drugs, or any substance that affects safe or effective job performance.
- Consuming, possessing, selling, distributing, or being under the influence of alcohol or illegal drugs on Company premises, in Company vehicles, or while conducting Company business.
- Using, possessing, or being under the influence of cannabis on Company premises or during working time.

Off-duty cannabis (AB 2188)

Consistent with California law, the Company does not discriminate against employees because of their lawful off-duty, off-premises cannabis use. This does not permit being impaired at work.

Prescription and over-the-counter medication

Use of legally prescribed and over-the-counter medications is permitted when taken as directed and provided the medication does not impair safe and effective performance. Employees should inform their manager or Human Resources if a medication may impair their job performance, or if they need an accommodation.

What to do if you observe impairment

If you observe a coworker who appears impaired at work and the situation may affect safety or borrower service, notify your manager or Human Resources immediately. The Company will address the situation through observation-based, fact-specific evaluation rather than testing.

6.7 Dress and Appearance

Employees are expected to maintain a clean, neat, and professional appearance appropriate to their role. Business casual is the standard. Employees who interact with borrowers in person should dress accordingly. The Company will reasonably accommodate dress and grooming consistent with religious beliefs, disability, gender identity and expression, and traits historically associated with race (including hair texture and protective hairstyles such as braids, locks, and twists).

6.8 Solicitation and Distribution

Employees may not solicit other employees or distribute non-work-related literature during working time. Working time is the time an employee is engaged or should be engaged in performing work; it does not include meal periods, rest breaks, or other authorized non-working time. Non-employees may not solicit or distribute on Company premises at any time. This policy is not intended to restrict employees' rights under the NLRA.

6.9 Media Inquiries

Only authorized spokespersons may speak on behalf of the Company. Direct any media inquiry to the President. Do not respond, comment, or speculate. This policy does not restrict employees' rights to discuss working conditions under the NLRA.

6.10 Non-Compete and Restrictive Covenants (AB 1076 / SB 699)

Consistent with California law, the Company does not enforce non-compete agreements, no-poach agreements, or other restrictive covenants that violate California Business & Professions Code §16600 et seq. Reasonable confidentiality and trade-secret protections remain in effect as permitted by law.

7. Health, Safety & Workplace Violence Prevention

7.1 Workplace Safety

The Company is committed to providing a safe workplace. Employees must follow safety rules, use protective equipment, and report unsafe conditions to their manager or Human Resources immediately. The Company complies with Cal/OSHA, the federal OSH Act, and other applicable safety laws. The Company maintains an Injury and Illness Prevention Program (IIPP) as required by California law.

7.2 Workplace Violence Prevention Plan (SB 553 / Labor Code §6401.9)

Effective July 1, 2024, California Labor Code §6401.9 requires nearly all California employers to establish, implement, and maintain a written Workplace Violence Prevention Plan ("WVPP"). The Company has adopted a WVPP that complies with §6401.9 and applies to all employees, regardless of role, work location, or full-time / part-time status.

The WVPP is a separate written document. It is available to every employee from Human Resources and on the Company's HR portal in ADP. Employees are required to review the WVPP and complete the related training.

What the WVPP covers

Consistent with §6401.9, the Company's WVPP contains:

- Names and titles of personnel responsible for implementing the plan.
- Procedures for active employee involvement in developing and implementing the plan, including how employees may submit suggestions.
- Methods for coordinating with other employers when employees share a worksite.
- Procedures to accept, respond to, and investigate reports of workplace violence — and to prohibit retaliation against anyone who reports.
- Procedures for emergency response, including alerting employees of an immediate threat, evacuation or sheltering, and obtaining help from law enforcement.
- Procedures for identifying and evaluating workplace violence hazards, including periodic inspections.
- Procedures for correcting workplace violence hazards in a timely manner.
- Procedures for post-incident response and investigation.
- Procedures for training employees at hire, annually, and whenever new hazards are identified or the plan is materially changed.
- Procedures for reviewing the effectiveness of the WVPP at least annually, after any significant incident, and whenever a deficiency becomes apparent.

Types of workplace violence covered

- Type 1: Violence committed by a person who has no legitimate business at the workplace.
- Type 2: Violence directed at employees by customers, clients, borrowers, or visitors.
- Type 3: Violence against an employee by a present or former employee or manager.
- Type 4: Violence committed by a person who does not work for the Company but has or had a personal relationship with an employee (including domestic violence that follows an employee to work).

Zero tolerance

Workplace violence of any kind — including physical assault, threats, intimidation, brandishing or use of weapons, stalking, harassment, and damage to property as an act of intimidation — is prohibited. Unauthorized firearms and weapons are prohibited on Company premises, in Company vehicles, and at Company events, regardless of any license to carry.

Reporting workplace violence

All threats, incidents, and concerns must be reported immediately. If you are in immediate danger, call 911 first. Reports may be made:

- Verbally or in writing to your direct manager.
- To Human Resources at (949) 216-6841 ext. 296 or hr@optimumfirst.com.

Employees who report in good faith are protected from retaliation. Any retaliation will be treated as a separate violation of policy.

Violent Incident Log and recordkeeping

The Company maintains a Violent Incident Log for every workplace violence incident, capturing date, time, location, who was involved, the type of incident, the consequence, and any corrective action. The Company maintains records as follows, per §6401.9:

- Records of hazard identification, evaluation, and correction: at least 5 years.

- Training records (employee name, date, training contents, name and qualifications of the trainer): at least 1 year.
- Violent incident logs and records related to incidents: at least 5 years.

Training

All employees receive workplace violence prevention training at hire and at least annually thereafter. Training covers the WVPP, the types of workplace violence the Company has identified, how to report concerns, how to respond to violent incidents, and any new or emerging hazards.

7.3 Heat Illness Prevention (Indoor)

Cal/OSHA's indoor heat illness rule applies when indoor temperatures reach the regulatory thresholds. The Company will provide cool-down areas, access to water, rest, and acclimatization as required. Employees should report symptoms of heat illness to their manager immediately.

7.4 Emergency Response

The Company maintains an emergency response plan including procedures for fire, earthquake, medical emergency, and active threat. Emergency exit routes and procedures are posted. Participate in drills. In an actual emergency, follow management's directions and call 911 if a life is at risk.

7.5 Security and Facility Access

Access to Company facilities is limited to employees and authorized visitors. Employees are responsible for the safekeeping of keys, badges, and access credentials and must report loss or theft immediately. The last employee to leave is responsible for securing doors, setting the alarm, and turning off non-essential equipment. Employees may not be on Company property outside of business hours without prior authorization.

7.6 Visitors

All visitors must sign in at reception and remain accompanied by an employee. Visitors are not permitted in work areas containing borrower information or other confidential materials except as necessary for legitimate business and with appropriate safeguards.

7.7 Smoking

Smoking, vaping, and the use of tobacco products are prohibited inside Company facilities and within 25 feet of any entrance, exit, or operable window, consistent with California Labor Code §6404.5.

7.8 Workplace Searches

The Company reserves the right to inspect Company-owned property (desks, lockers, vehicles, computers, email, and other Company systems) at any time. Employees should not have an expectation of privacy in Company property. Personal property brought onto Company premises (purses, briefcases, vehicles parked on Company premises) may be subject to inspection when there is reasonable suspicion of policy violation. Employees are expected to cooperate with reasonable searches.

8. Technology, Communication & Privacy

8.1 Computer, Email, and Internet Use

Company computers, devices, email, internet access, and other Electronic Communication Systems (ECS) are provided for business purposes. Limited personal use is permitted only when it does not interfere with work,

consume meaningful Company resources, or violate any policy. Employees have no expectation of privacy in any use of Company ECS.

Prohibited uses include:

- Discrimination, harassment, or other unlawful conduct.
- Accessing, viewing, or distributing pornographic, obscene, or otherwise inappropriate material.
- Unauthorized disclosure of confidential information, including borrower NPI.
- Pirating software, infringing copyright, or violating license agreements.
- Using Company systems for personal financial gain, gambling, or illegal activity.
- Bypassing security controls or downloading unapproved software.

The Company monitors and logs use of Company systems consistent with applicable law. Nothing in this policy is intended to restrict employees' rights under the NLRA.

8.2 Information Security and Borrower Privacy

The Company is subject to the Gramm-Leach-Bliley Act (GLBA) Safeguards Rule and maintains a separate Written Information Security Program (WISP) and Incident Response Plan. All employees must follow the WISP, including:

- Use only Company-approved devices and applications for borrower data.
- Use multi-factor authentication and strong, unique passwords.
- Encrypt borrower NPI in transit and at rest; never email unencrypted NPI.
- Lock screens when stepping away; secure paper documents containing NPI.
- Report suspected security incidents, phishing attempts, or lost devices to IT and HR immediately.
- Complete all required information security training annually.

8.3 Social Media

Employees are responsible for what they post about the Company, its borrowers, or coworkers, even on personal accounts and outside of work hours. The Company is subject to advertising and marketing regulations (including TILA-RESPA, UDAAP, and TCPA).

When posting:

- Do not disclose borrower information or confidential business information.
- Do not make statements that could be interpreted as the Company's official position unless authorized.
- Do not engage in harassment, discrimination, or threats.
- If you discuss the Company, make clear that the views are your own.
- All promotional posts referencing rates, programs, or loan features must be reviewed and approved by Marketing and Compliance before publication. Posts must comply with NMLS, fair lending, and advertising rules.

Nothing in this policy is intended to restrict employees' rights under the NLRA to discuss wages, working conditions, and other terms and conditions of employment.

8.5 Cell Phones and Mobile Devices

Employees should use sound judgment with personal cell phones and mobile devices at work. Personal use should not interfere with productivity. Phones should be silenced during meetings and where calls would be disruptive.

While driving for Company business, employees must comply with California's hands-free and anti-texting laws. Using a handheld device while driving is prohibited. Use a hands-free device for calls and never text or use applications while driving. If a call or task cannot be safely completed while driving, pull over.

8.6 Recording and Videotaping

Employees may not record audio or video of any conversation, meeting, or activity at work without the express consent of all parties involved and Company authorization. This protects confidentiality and complies with California's all-party consent law (Penal Code §632).

8.7 Remote and Hybrid Work

Remote and hybrid work arrangements are not a Company-wide entitlement. They are made available at the Company's discretion based on business needs, the requirements of the role, and individual performance. The Company reserves the right to authorize, modify, or revoke a remote work arrangement at any time.

Any approved remote or hybrid arrangement is subject to the following:

- Employees must have a safe, ergonomic, and private workspace for performing work involving borrower NPI.
- Employees must use Company-approved devices and VPN/secure connections.
- Employees remain subject to all Company policies, including timekeeping, meal and rest breaks, and information security.
- Remote work arrangements may be modified or revoked based on business needs, performance, or compliance considerations.

8.8 Use of Company Property

Company property — including computers, software, data, vehicles, and supplies — is provided for business use. Employees are responsible for the proper care and use of Company property assigned to them. Damage or loss caused by negligence may, to the extent permitted by law, be the employee's responsibility. All Company property must be returned upon separation.

9. Mortgage Industry Compliance

As a California-licensed mortgage company (NMLS #240415), Optimum First Mortgage is subject to extensive federal and state regulation. The Company maintains separate, detailed compliance manuals and policies that govern day-to-day mortgage operations. The summary below highlights key obligations that apply to all employees; the separate compliance manuals control on the details.

9.1 Key Standalone Compliance Programs

The following programs exist as standalone Company documents. Employees in scope are required to read, follow, and complete training on each:

- NMLS / SAFE Act licensing — MLO licensing maintenance, continuing education, and disclosure of regulatory events.
- Bank Secrecy Act / Anti-Money Laundering (BSA/AML) Program — including Customer Identification, red-flag identification, and SAR confidentiality.
- Written Information Security Program (WISP) under GLBA — protection of borrower NPI, access controls, vendor oversight, and incident response.
- Fair Lending policies — Equal Credit Opportunity Act, Fair Housing Act, HMDA, and California fair lending laws.

- RESPA / TILA / TRID procedures — required disclosures and prohibited referral arrangements.
- Loan Originator Compensation Plan — Regulation Z §1026.36, anti-steering, no dual compensation.
- UDAAP guidelines — accurate, clear, non-misleading borrower communications.
- Advertising and Marketing Compliance — Marketing and Compliance review before any external publication; NMLS #240415 required on advertisements where applicable.

Contact the Compliance Department with any questions about which program applies to your role.

9.2 Employee Obligations

Regardless of role, all employees must:

- Follow the policies in the applicable standalone compliance program.
- Complete required compliance training on time.
- Never alter, backdate, or remove documents from a loan file other than in the normal course of business and with the appropriate audit trail.
- Never disclose to a borrower or any third party that a Suspicious Activity Report has been filed or considered.
- Never share borrower NPI outside of approved Company systems.
- Dispose of any document containing NPI by shredding or secure electronic destruction — never in the regular trash or recycling.

9.3 Reporting Compliance Concerns

If you observe or suspect a compliance violation, report it immediately. Reports may be made to your manager, Human Resources, the Compliance Department, or the President. Retaliation against any employee who reports a compliance concern in good faith is strictly prohibited (see Section 2.3).

10. Training, Development & Required Notices

10.1 Required Training

All employees are required to complete the following training, as applicable to their role:

- Sexual harassment prevention training: 1 hour for all non-supervisory employees and 2 hours for managers and other supervisors as defined by California Government Code §12950.1, every two years and within 6 months of hire or promotion (Government Code §12950.1).
- Workplace Safety
- Data Privacy
- Workplace violence prevention training: at hire and annually (Labor Code §6401.9).
- BSA / Anti-Money Laundering training: annually for MLOs, processors, and related roles.
- Information Security / GLBA Safeguards training: at hire and annually.
- Fair lending / UDAAP refresher: annually for client-facing and underwriting roles.
- Role-specific training as assigned by management or Compliance.

Required training is paid working time for non-exempt employees. Failure to complete required training in a timely manner is grounds for discipline.

10.2 Posted Notices

Mandatory federal and state employment notices are posted at each Company location and available electronically through ADP. Employees should review the posters periodically and ask HR if they have questions about any required notice.

Acknowledgment of Receipt

Please read, sign, and return this page to Human Resources. A signed copy will be retained in your personnel file.

I acknowledge that I have received a copy of the Optimum First Mortgage Employee Handbook (2026 Edition). I understand it is my responsibility to read, understand, and comply with the policies in the handbook, and I may ask my manager or Human Resources if I have any questions.

I understand and agree that:

- My employment with Optimum First Mortgage is at-will. Either I or the Company may terminate the employment relationship at any time, with or without cause or notice. No oral or written statement modifies this status except a written agreement signed by the President and me.
- This handbook is not a contract of employment and does not create any promise of continued employment.
- The Company may revise, suspend, cancel, or modify any policy in this handbook at any time, with or without notice, except for the at-will employment policy.
- I have received the policies on EEO; anti-harassment, anti-discrimination, and anti-retaliation; vacation and sick leave; meal and rest periods; workplace violence prevention; CCPA / employee privacy; information security and borrower privacy; and the other policies in this handbook.
- I will protect borrower nonpublic personal information and Company confidential information in accordance with these policies.
- Any prior handbooks, policies, or practices that conflict with this handbook are superseded.

_____ Date: _____

Employee Signature

_____

Printed Name

Return signed acknowledgment to the Human Resources Department · hr@optimumfirst.com · (949) 216-6841 ext. 296