

Colony Ridge Nondiscrimination Policy and Complaint Procedure (NPCP)
Adopted pursuant to Settlement Agreement ¶J31

1. Purpose and Scope

This Nondiscrimination Policy and Complaint Procedure (“NPCP”) establishes Colony Ridge’s commitment to fair, equitable, and nondiscriminatory practices in all lending, credit, and residential land-sale activities. This policy applies to all employees, contractors, agents, and representatives involved in marketing, underwriting, servicing, collections, customer service, or any other aspect of consumer interaction.

2. Commitment to Equal Access

Colony Ridge strictly prohibits discrimination in any aspect of lending, credit evaluation, financing, or residential land sales. All decisions must be based solely on legitimate, nondiscriminatory business criteria.

The organization complies fully with:

- **The Fair Housing Act (FHA)**, which prohibits discrimination in housing-related transactions based on race, color, national origin, religion, sex (including sexual orientation and gender identity), familial status, or disability.
- **The Equal Credit Opportunity Act (ECOA)**, which prohibits discrimination in any credit transaction based on race, color, religion, national origin, sex, marital status, age (provided the applicant has legal capacity), receipt of public assistance income, or the good-faith exercise of rights under the Consumer Credit Protection Act.

Discrimination is prohibited in all aspects of the credit and land-sale process, including but not limited to: advertising, marketing, application intake, credit evaluation, pricing, terms, servicing, collections, and foreclosure activity.

3. Advertising and Consumer Materials

To ensure equal access and clear communication, applicable advertisements, disclosures, contracts, notices, and consumer-facing materials used in sales or lending must be provided in both English and Spanish. Marketing content must be inclusive, accurate, and free of any language or imagery that could discourage or exclude protected classes.

4. Reporting Alleged Discrimination

Any consumer, applicant, or employee may report suspected discrimination. Reports may be made verbally or in writing and may be submitted anonymously, although contact information is encouraged to allow follow-up.

How to File a Complaint

Complaints may be submitted to Compliance Specialist Doug Foster using the following:

- **Telephone:** (281) 399-5263 (Customer Service will route your message to Doug Foster)
- **Email:** dfoster@colonyridge.com

The complaint should include, to the extent possible: the name and contact information of the complainant, date(s) of the incident, description of the alleged discriminatory conduct, names of any involved employees or witnesses, and any supporting documents.

5. Complaint Review Process

1. Acknowledgment:

The Compliance Specialist will acknowledge receipt of the complaint within three business days.

2. **Investigation:**

The Compliance Specialist will review all relevant documents, interview involved personnel, and gather any necessary information.

3. **Written Response:**

A formal written response will be provided within two weeks of receiving the complaint. If additional time is required due to complexity, the complainant will be notified in writing with an updated timeline.

4. **Corrective Action:**

If a violation is substantiated, appropriate corrective measures—including employee training, disciplinary action, or policy adjustments—will be implemented promptly.

5. **Non-Retaliation:**

Retaliation against any person who files a complaint or participates in an investigation is strictly prohibited.

6. Employee Responsibilities

All employees must follow this NPCP at all times, treat all consumers fairly and respectfully, report any suspected discriminatory conduct immediately, and cooperate fully with compliance investigations.

7. Policy Administration

The Compliance Department is responsible for maintaining this policy, ensuring staff training, and monitoring compliance with FHA, ECOA, and all applicable federal and state laws.