

Social Media, Internet and Email Policy and Procedures

PURPOSE: To ensure appropriate use of Company-provided Internet access and Internet e-mail by Company staff. Our Social Media Officer is Megan Ennis.

APPLICABILITY: This policy applies to all staff of the Company who utilize the internet, e-mail, and computers on Company premises, or who utilize Company-sponsored/provided internet sites, services, software, or e-mail off of Company premises.

BACKGROUND: In the interest of providing current technology for the use of employees who are required to research corporate issues or communicate with others through electronic mail services, the Company has authorized and paid for Internet access for many of the staff members. This allows users to access many other non-work related computer information sites once an individual is connected to the service through their computer.

POLICY: It is essential for each social media/internet/e-mail user to recognize his/her responsibility in having access to vast services, sites, systems and people. The user is ultimately responsible for his/her actions in accessing network services and the Internet.

Social Media. We define social media as forms of electronic communication through which users create online communities to share information, ideas, personal messages, and other content (such as video, blogs, wikis, photos, podcasts, social networking, mashups and virtual worlds).

All employees should be aware of their employment association in online social networks. If staff identifies himself or herself as a our employee or has a public facing position for which association with us is known to the general public, he or she must be certain that his or her profile and related content is consistent with how he or she wishes to be presented as our professional.

Published content is persistent in the public domain. When staff is representing us in an official capacity, we are responsible for the content published on blogs, wikis or any other form of user-generated media. Staff must assume communications are public domain, available for publishing or discussion in all forms of media.

Internet. Internet service provided by the Company be used for business purposes or e-mail (electronic mail). The Company understands that some personal use of e-mail or internet browsing/shopping may occur from time to time, and has no restrictions as such when this activity is performed during non-paid hours, using the same professional/business protocols as described in this policy.

Any improper use of the internet service provided by the Company for viewing, downloading or accessing information (offensive, lewd, pornographic, violent, et al.) not needed for Company business, for sending documents or other proprietary material that result in damage to the Company, or for spending excessive company-paid time using the Internet for personal purposes may be subject to discipline up to and including termination.

E-mail. Using e-mail to send messages outside the Company makes the sender an official representative of the Company. Generally, e-mail is to be used for official communications only (again, some use of e-mail for personal issues is acceptable when done on non-paid time using the same professional/business protocols as described in this policy). **Securing an email is very difficult. Securing an email requires special software and training. Transferring sensitive documents should never be done with email unless it's password protected.**

Use of e-mail provided by the Company expressly prohibits the following:

- Dissemination or printing of copyrighted materials, including articles and software, in violation of copyright laws.
- Sending, receiving, printing or otherwise disseminating proprietary data, trade secrets or other confidential information of the Company in violation of Company policy or proprietary agreements.

- Offensive or harassing statements or language including disparagement of others based on their race, national origin, sex, sexual orientation, age, disability, religious or political beliefs.
- Operating a business, usurping business opportunities or soliciting money for personal gain, or searching for jobs outside the Company.
- Sending chain letters.
- Gambling or engaging in any other activity in violation of local, state or federal law.
- Transmitting documents/pictures containing pornographic or other sexually explicit materials.
- "Spams" or anonymous mailings
- Propaganda (religious or political doctrine)

As an official communication tool, it is subject to the same standard of professionalism and prohibition of discriminatory or inflammatory remarks/jokes/photographs or any other medium, as required in all other conduct of Company business.

** Under United States law it is unlawful to transmit unsolicited advertisements to other fax machines or computers. The law allows individuals to sue the sender of such illegal "junk mail" for \$500 per copy. Most states will permit such actions to be filed in Small Claims Court. Keep this in mind as you plan your marketing approaches.*

Downloads and E-mail Attachments. Downloads of software, shareware, graphics, documents, etc., are the heart and soul conveniences of the Internet. Since so many computer viruses are spread through these downloads, the Company **highly recommends** that all computers are installed with a good virus protection program. All users should get the approval of their managers before downloading any software onto Company-owned computers. If a virus is encountered with a stand-alone PC (non-networked), only the files on that PC may be damaged. If a virus is encountered with a networked PC, chances are very good that all PC's linked to the network will be damaged.

Company management reserves the right to monitor employee e-mail and Internet usage. As a general rule, the Company will make every effort to keep employee e-mails private. There may come a time, however, where access to e-mail messages may become a necessity (such as unexpected employee absences, or to conduct investigations where illegal activity is suspected). The Company reserves the right to view saved e-mail messages without verbal or written notice.

If, at any time, the Company chooses to install Internet monitoring devices, users will be notified in advance, in writing.

Personal Web Pages, Web Sites and Links. Personal web pages or web sites created using the company name in any variation within the domain name or within web pages is strictly prohibited. Also prohibited are any web sites or personal pages of any future divisions, affiliated companies or subsidiaries of the above, or any name variation thereof. Links or key words for search engines (included in the unseen html code used to create web pages) that are included with personal web pages or web sites are also strictly prohibited. Exceptions will be considered in writing to the President. Links by other companies to the Company web site is not prohibited.

PROCEDURES:

Adding new staff

All new personnel will be assigned a Company e-mail account by the IT supervisor.

Maintenance

- ❖ Check e-mail frequently (but no less than once per day).
- ❖ Delete unwanted messages immediately since they take up storage on the computer system (also run the utility from Outlook to empty deleted mailbox by going to Tools, then choosing Empty Deleted Items). Print or store on diskette or harddrive those messages and/or attachments that fall under record keeping guidelines.
- ❖ Keep downloaded files to a minimum. Downloaded files should always be virus checked. Files should be downloaded to your personal computer's hard drive or to diskettes. It is the user's responsibility when downloading programs to check for copyright or licensing agreements. If the program is beneficial to your use, pay any authors registration fee. If there is any doubt, don't copy it. Support for any downloaded programs should be requested from the originator of the application.
- ❖ Routinely and frequently virus-scan you system, especially when receiving or downloading files from other systems to prevent the spread of a computer virus. **Note to office managers: in order for anti-virus software to be effective, it must be upgraded with the latest*

Citrus Lending Inc.
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WWW.CITRUSLENDING.COM
NMLS ID: 326484

SAFE ACT Policies and Annual Certification Procedure

Covered financial institutions that employ one or more MLOs must adopt and follow written policies and procedures to carry out their SAFE Act responsibilities. Our Company falls into the class of companies required to comply.

The requirement to adopt and follow policies and procedures applies to all covered financial institutions that employ individual MLOs, where MLOs act within the scope of their employment, and regardless of the application of any de minimis exception to their employees.

The SAFE ACT also requires us to conduct annual independent compliance tests to ensure compliance with the regulation.

Our policies and procedures will be appropriate to the nature, size, complexity, and scope of the institution's mortgage lending activities, and apply only to those employees acting within the scope of their employment at the institution.

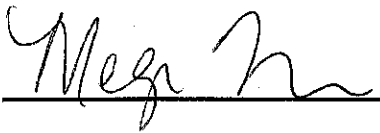
Here is what we require to be compliant with the SAFE ACT:

- We have identified Megan Ennis as the person responsible for administering SAFE ACT policies and procedures.
- We will establish a process for identifying which employees of our company that must be registered;
- We will require that all employees who are MLOs be informed of the registration requirements of the SAFE Act and SAFE Act regulation, and instructed on how to comply. This will be done as part of the job offer process;
- We have established procedures to comply with the SAFE Act regulation's unique identifier requirements whereby the identifiers are obtained through registration with the NMLS;
- We have established reasonable procedures for confirming the adequacy and accuracy of MLO employee registrations, including updates and renewals, by comparisons our records with those of the NMLS;

- We have established a monthly procedure for spot checking continuing compliance with registration and renewal requirements and procedures;
- We have utilized an outside firm for annual independent testing for compliance with the SAFE Act regulation by institution personnel or an outside party;
- We will act quickly where an employee fails to comply with the registration requirements of the SAFE Act regulations or the institution's related policies and procedures, including prohibiting such employees from acting as MLOs or other appropriate disciplinary actions;
- We have a new hire procedure for reviewing employee criminal history background reports received pursuant to the regulation, taking appropriate action consistent with applicable federal law and implementing regulations with respect to the reports, and maintaining records of the reports and actions taken with respect to applicable employees; and
- We will verify that any third party with which the institution has arrangements related to mortgage loan origination has policies and procedures to comply with the SAFE Act and SAFE Act regulation, including appropriate licensing and/or registration of individuals acting as MLOs.

Attached to this policy is a copy of the FDIC Compliance Manual V-14 as specific reference to any other requirements we may have in our effort to properly enforce the SAFE ACT.

Accepted for the Company:



Name

9/11/15

Date

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Hard Money Lending Using Borrower's Principal Residence to Finance his Business

From time to time a borrower may request a loan against his principal residence to use the proceeds for a qualified business purpose. When this takes place, we will take extra caution to be sure our borrower understands that this type of loan product will fall outside the protections of our Regulation Z, our Qualified Mortgage Policy, and HOEPA. To insure their understanding, we will have them execute this affidavit at application, and again at closing.

"An exception in Regulation Z allows you to use your principal residence to finance your business. The exception states:

Section 226.3 of Reg Z entitled "Exempt Transactions" begins with: "This regulation does not apply to the following:" Section 226.3(a) follows and is entitled "Business, commercial, agricultural, or organizational credit." Section 226.3(a)(1) simply provides: "an extension of credit primarily for a business, commercial or agricultural purpose." An extension of credit against a principal residence primarily for a business, commercial, or agricultural purpose is exempt from Reg. Z. Examples of true business-purpose credit include loans to expand a business, even if it is secured by the borrower's residence or personal property.

I, _____, hereby certify that I will use all the proceeds of this hard equity loan product for a business, commercial, or agricultural purpose. I understand this loan will be secured by my principal residence and is exempt from the QM and HOEPA protections usually available to me. I accept this risk to my principal residence knowingly. I indemnify my broker/lender from any claims real or imagined that might arise at any time from anyone regarding my acceptance of this loan product"

Signed, this _____ of _____:

Borrower Name and Date

Broker or Lender Witness and Date

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