



Enterprise Risk Management

Internal Allegations Policy

Overview

It is the policy of loanDepot, Inc. ("LDI") and its direct and indirect subsidiaries, affiliates, and joint ventures (collectively hereinafter referred to as the "Company") to enable employees, business partners, and other stakeholders to report actual or suspected illegal, fraudulent, or unethical conduct and to protect them from unlawful retaliation for making good faith reports.

Definitions

Covered Person: All employees, directors, agents, independent contractors, consultants, and contingent workers who work for or are associated with the Company.

Complainants: A Covered Person who submits a "Complaint," as that term is defined herein.

Investigation Participants: Covered Persons who are interviewed or asked to provide information or otherwise participate in an investigation of a Complaint, including employees who are the subject of the investigation.

Complaints: Complaints or concerns regarding accounting, internal auditing controls, auditing matters, of the Company as well as other wrongful activity that should be reported to the Company including, but not limited to, the following:

- Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company
- Fraud or deliberate error in the recording or maintaining of financial records of the Company
- Deficiencies in or noncompliance with the Company's internal accounting controls
- Misrepresentations or false statements to or by a senior officer of the Company or an accountant regarding a matter contained in the financial records, financial reports, or audit reports of the Company
- Deviation from full and fair reporting of the Company's financial condition
- Illegal conduct
- Fraud
- Unfair or unethical conduct
- Mismanagement
- Conflicts of interest
- Inappropriate relationships
- Unfair, Deceptive, or Abusive Acts/Practices
- Discrimination or harassment
- Theft or misappropriation of Company assets
- Abusive or deceptive miscommunication
- Unsafe or dangerous actions or practices, and

- Other wrongful conduct that may affect the security, soundness, or reputation of the Company.

Policy

The Company's Internal Allegations Policy ("Policy") relates to all Complaints and applies to all Covered Persons. The purpose of this Policy is to create an environment in which suspected wrongdoings, unethical conduct, or illegalities are reported to the Company in a timely fashion, without fear of retaliation, and to alert the Audit Committee to possible issues before they have serious consequences to the Company.

This Policy shall be provided to employees at time of hire and made generally available via the Company's intranet.

Notice

This Policy and the accompanying provisions set forth herein serve to notify Covered Persons of LDI of the following:

- All complaints covered under this policy will be handled as required by law, with disclosure on a "need to know" basis for other stakeholder involvement for investigation purposes;
- If a Complainant brings his or her complaint to an outside regulator or other governmental entity, he or she may be protected pursuant to the terms of the Policy;
- It is both illegal and against LDI's policy to discharge, demote, suspend, threaten, intimidate, harass or in any manner discriminate against Complainants and Investigation Participants in retaliation for making a Complaint or disclosing information relating to a Complaint in good faith.

Information Regarding Third-Party Reporting Service

The Company provides a link to the Third Party Hotline (with option to report anonymously) internally on our main Intranet Homepage, alongside the other most importantly accessed links.

Responsibilities and Rights of Complainants and Investigation Participants

Responsibilities

Complainants have a responsibility to act in good faith and have a reasonable belief regarding the validity of Complaints. The motivation of a Complainant is irrelevant to the consideration of the validity of the Complaint. However, the intentional filing of a false Complaint, whether orally or in writing, may itself be an improper activity and one that may result in disciplinary action.

A Complainant has a responsibility to be candid and set forth all known information regarding the Complaint. Covered Persons who are interviewed or asked to provide

information or otherwise participate in an investigation of Complaint, including employees who are the subject of the investigation, have a duty to cooperate fully and assist in the investigation.

Complainants are not to act on their own in conducting any investigative activities, nor do they have a right to participate in any investigative activities other than as requested. A Complainant shall refrain from obtaining evidence relating to a Complaint for which the Complainant does not have a right of access.

The Company will use reasonable best efforts to promptly investigate each Complaint and keep a summary of the outcome of any investigation.

This Policy does not limit Covered Persons from reporting alleged violations relating to accounting or auditing matters to proper governmental and regulatory authorities.

Rights

Complainants and Investigation Participants are entitled to protection from retaliation for making a Complaint or disclosing information relating to a Complaint in good faith. The Company shall not discharge, demote, suspend, threaten, harass, or in any manner discriminate against a Complainant or Investigation Participant in the terms and conditions of employment based upon any lawful actions of such Complainant or Investigation Participant with respect to good faith reporting of Complaints. It is a serious violation of the policies of the Company, and under certain circumstances a violation of federal or local law, for any supervisor, manager, director, or officer of the Company to initiate or encourage reprisal against an employee or other person who in good faith reports a known or suspected violation of criminal law or any other matter that may be reported under this policy. A Complainant's right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the Complaint or an ensuing investigation.

To the extent possible and permitted under law, Complaints, reports, and investigations related to such Complaints, shall be kept confidential. Disclosure of such Complaints to individuals not connected to the investigation will be viewed as a serious disciplinary offense and may result in discipline, including termination of employment.

Procedures

The Company's primary goal is to ensure that it obtains the information needed to address/correct any alleged wrongdoings taking place. The Company is committed to high standards of ethical, moral, and legal business conduct. In line with this commitment, the Company is determined to:

- Promote an environment of open communication between the management and staff and other stakeholders.
- Encourage interested parties to bring forward ethical and legal violations and/or a reasonable belief that ethical and legal violations have occurred, so that action may be taken to resolve the complaint.

- Effectively communicate that the Company is serious about adherence to its corporate governance policies and that raising internal allegations, when applicable, is an important tool in achieving this goal.
- Provide avenues for employees and other stakeholders to raise concern, including anonymously through the Employee Hotline.
- Reassure employees and other stakeholders that they will be protected from retaliation, reprisals, or victimization for reporting concerns.

Reporting Complaints

Any suspected illegal, fraudulent, or unethical activity should be reported immediately. The Company allows submission of Complaints either orally or in writing. Complaints may be reported anonymously or directly through one of the following methods:

- Discuss with your supervisor or manager
- Discuss with the human resource department
- Discuss with a legal department attorney
- Discuss with the Chief Risk Officer
- Report in Person or by mail:

Attn: Chief Risk Officer
loanDepot
6561 Irvine Center Drive
Irvine, CA 92618

Utilize the Employee Hotline (Managed by a Third-Party Vendor for Privacy if desired)

- **By Phone:** 1-844-995-4898
- **By Computer or Mobile Device:**
<https://secure.ethicspoint.com/domain/media/en/gui/82303/index.html>

To assist in the investigation of a Complaint, the Complaint should provide as much specific information as possible to allow for proper assessment of the nature, extent, and urgency of the matter that is the subject of the Complaint. To the extent possible the following information should be provided

- The alleged event, matter, or issue that is the subject of the Complaint
- The name of each person involved
- If the Complaint involves a specific event or events, the approximate date and location of each event, and
- Any additional information, documentation, or other evidence available to support the Complaint.

Investigation Process

The Enterprise Risk Management Team, under the Chief Risk Officer, has an internal process to oversee and monitor aggregated internal allegations. For complaints received through the Employee Hotline, they will assign the appropriate team to investigate and further report.

The Human Resource Department is typically the primary investigators of Employee Complaints, and the HR Department maintains an internal investigation process/procedure.

Generally, the Human Resources Department will collect the information and investigate the matter as appropriate based on the nature of the matter and may involve other resources and areas in the investigation as necessary, including Legal, IT/IS, Risk or Compliance. Any person to whom an investigation is delegated shall have the appropriate expertise and qualifications to conduct the investigation. Any complaint received from the third-party vendor that alleges wrongdoing by a named HR, Risk or Legal employee automatically blocks access to that employee from seeing any details on the Complaint. A separate internal process is followed in circumstances where allegations implicate normal channels involved with Complaint investigations, including the involvement of the Board and/or outside advisors as necessary. Complaints will be promptly evaluated and investigated, although the seriousness and complexity of the concern can affect the time needed to investigate the matter. In some instances where heightened awareness and sensitivity are required, complaints may be brought to the Board for further review and discussion. This investigation may include hiring outside advisors such as lawyers, accountants, and auditors to conduct procedures under the direction of the Audit Committee. The Company will provide appropriate funding, as determined by the Audit Committee, to compensate any advisor engaged.

After completing an investigation of a Complaint, the investigator shall prepare a report explaining the conclusions and advice with respect to the Complaint and kept in the system of record. The Audit Committee may, in its sole discretion, request a briefing for additional details.

Retention of Complaints

All reports of Complaints will be thoroughly and promptly investigated, and investigation records shall be maintained in the system of record. If a verbal Complaint is made, the receiving manager is responsible for documenting the complaint in writing to be further investigated per the process outlined.

Treatment of Reports

Reports may be submitted anonymously or the person submitting the report may request to remain anonymous by using the employee hotline. The Company shall exercise its best efforts to safeguard the identity of any person who wishes to remain anonymous; however, anonymity cannot be guaranteed given the nature of the investigative process. The Company shall protect Complainants from retaliation, as described in this Policy. Discussions and documentation pertaining to each report will be kept in strict confidence. If a person submitting a report identifies himself or herself, the employee will be informed of the steps needed to address the incident.

Review of Reports

The Enterprise Risk Management team will provide ongoing reporting, at least quarterly to the Enterprise Risk Management Committee and Board Audit Committee on thematic allegations and other issues relating to the internal complaints process. The timing of reporting may be more frequent, as necessary.