



**Compliance Policy HR05:
Business Standard Code of Conduct**

Effective Date: 01/01/2018

Scope

This business standard (“Standard”) is applicable to Dividend Finance, LLC and all its affiliates and subsidiaries (“Dividend” or the “Company”) and affiliated company consultants, contract workers, partners, marketing partners and temporary staff (“Covered Persons”). This Standard covers reporting concerns of violations of laws or regulations and real or perceived wrongdoing; including concerns that arise during the course of doing business. Consultants, partners, installers, vendors, contract workers, and their staff are not Dividend employees, and nothing in this Standard should be construed to the contrary.

Standard

Covered Persons should consistently demonstrate ethical business conduct, professional behavior, adherence to acceptable business principles, personal integrity, and compliance with applicable laws and regulations. Additionally, Covered Persons must adhere to all compliance requirements and other terms contained in their applicable agreement with Dividend.

It is Dividend’s policy to comply with all applicable laws and regulations relating to its lending business as well as workplace conduct. This Standard sets forth requirements for appropriate conduct in the workplace and compliance with applicable standards of professionalism for Covered Persons. The conduct of Covered Persons will be judged by whether such conduct complies with applicable laws, regulations, and Dividend policies. This Standard is not intended to describe every such law, regulation, or Company policy that may apply to Covered Persons; rather it is intended to provide general guidelines and reporting process.

General Guidelines for Professional Conduct

The following is a non-exhaustive list of types of conduct that are prohibited. Covered Persons must also consult the Employee Handbook for additional guidance, particularly for Covered Persons located or visiting a Dividend office.

- Discriminatory, harassment and/or discourteous conduct toward customers, employees, vendors or others;
- Failure to adhere to accepted industry standards for specific professions (e.g., sales, credit operations, IT and accountants);
- Discrimination on the basis of any legally-protected attribute, status, or characteristic, including but not limited to, race, color, national origin, ethnicity, gender, gender identity, sexual orientation, religion, age, marital status, disability, and disabled veteran or veteran of war;
- Harassment of any kind, including sexual harassment;
- Workplace violence or threats of violence;
- Intimidation or retaliation that violates the Compliance Reporting and Non-Retaliation Policy; and

This policy is pending approval by the Office of the General Counsel and Board.
December 28, 2017

- Any conduct that fails to promote a professional environment or that portrays Dividend in an unprofessional or unscrupulous manner.

Customer Confidence in Products and Workmanship

Dividend strives to provide world class service and promote a more sustainable and equally distributed resource future through technology-enabled financial innovation. Dividend will never compromise this mission; instead Dividend will strive to focus on our customers through people first (Relationship Matters Most), creating wins for all, quality-focused obsession by exceeding industry standards, challenging the status quo through change, and fulfilling our customers' core objectives. Dividend's Code of Conduct surpasses state and federal standards for its partners, installers, suppliers and vendor through the following tenets:

- Covered Persons shall hold paramount the safety, health and welfare of the public in the performance of their duties.
- Covered Persons shall act in professional manners for each employer or client as faithful agents or trustees.
- Covered Persons shall maintain the highest ethical standards while advertising, selling, installing and servicing guided by the principals of honesty and integrity.
- Covered Persons shall avoid deceptive acts in their solicitation.
- Covered Persons shall offer and honor clear, understandable warranties that comply with all applicable state and federal regulations.
- Covered Persons shall not falsify or permit misrepresentation of their professional qualifications (license status, years in business, etc.) as a contractor.
- Covered Persons shall present honestly the capabilities, performance, and energy savings potential for their products.
- Covered Persons shall employ well-trained sales personnel to provide customers with up-to-date, understandable product information.
- Covered Persons shall quote accurate pricing and well-defined completion dates, and absent any unforeseeable factors, shall strive to fulfill the estimates.
- Covered Persons shall not knowingly quote a project that does not meet solar and other applicable codes or knowingly present bids on work with the intent on profiting from change orders.
- Covered Persons shall perform contracting services only in their area of expertise.
- Covered Persons shall not affix their signatures to any plans or documents dealing with subject matter in which they lack competency.

Professional Obligations

- Covered Persons shall be guided in all their professional relations by the highest standards of integrity.

This policy is pending approval by the Office of the General Counsel and Board.
December 28, 2017

- Covered Persons shall admit and accept their own errors when proven wrong and take appropriate action to correct the error.
- Covered Persons shall observe and foster the highest standard of safety and working conditions for employees.
- Covered Persons shall actively participate in the training and complete required training as mandated by Dividend.

The above tenets apply to behavior in person, via telephone, online (including social media) or directed through a Covered Person’s delegate.

Compliance with Laws and Dividend Policies

Dividend requires compliance with its code of conduct, all applicable U.S. federal, state and local laws and regulations, including laws regulating the onboarding, compensation, discipline, and termination of any Covered Persons or dealings with Dividend consultants and contract workers. Nothing in this Standard is intended to limit or prevent any individual from engaging in activity protected by law (for example, reporting to law enforcement officials any suspected violation of law).

Covered Persons Responsibility for Compliance

Dividend expects Covered Persons to (1) be familiar with (or take appropriate steps to become familiar with) the laws and regulations applicable to the activities they manage or supervise, (2) ensure their direct reports have appropriate training on compliance requirements to perform their job functions, and (3) supervise their direct reports with respect to compliance requirements and activities. If Dividend determines that any Covered Person has violated these Standards, applicable laws or regulations, or any terms of the Covered Person’s applicable services agreement, appropriate disciplinary measures will be taken, up to and including immediate termination the contract or relationship with the Covered Person.

Standard Revision History

Date	Description	Version
01/10/18	Pending Board Approval	

This policy is pending approval by the Office of the General Counsel and Board.
December 28, 2017

This policy is pending approval by the Office of the General Counsel and Board.
December 28, 2017