

Consumer Protections **Dividend Shield**

Dividend is committed to comprehensive and encompassing consumer protections.

Consumer Protections is Part of Dividend's DNA

Since our founding in 2014, the Dividend family of companies has always put consumer protection first. Dividend's roots are in consumer lending through our licensed lending company, Dividend Solar Finance, we provide financial products in 24 states. In 2016, Dividend expanded its product offering by adding residential PACE to its suite of products. For all the products that Dividend offers, we utilize systems and processes that promote our corporate values and that are based on regulatory compliance and industry best practice consumer protection standards.

Incorporating Industry Best Practices

Dividend has taken care in the development of its residential PACE program, incorporating industry best practices from PACENation, the Solar Energy Industries Association (SEIA), and the Department of Energy (DOE). For more information please see the following resources:

- PACENation - <http://pacenation.us/pacenation-sets-new-standards-consumer-protections>
- SEIA - <http://www.seia.org/policy/consumer-protection>
- DOE - <https://energy.gov/eere/slsc/downloads/updated-guidelines-residential-pace-financing-programs>

Emphasis on Customer Understanding and Disclosures

Dividend provides state legislation-compliant disclosures in plain English and in straightforward documents to promote homeowners' understanding of financing terms and conditions. **Dividend performs verification calls on 100% of our projects.** Prior to closing any project with a consumer, we speak to the homeowners by phone, reviewing key terms including, but not limited to, repaying a PACE assessment on the property tax bill, PACE impacts on home refinance or sale, and counseling customers to obtain professional tax advice.

Checks and Balances for Partner and Project Quality

Each contractor undergoes a throughout vetting process to ensure its reputation and installation workmanship meet our quality assurance standards. This process includes confirming licensing, insurance, and experience, and reviewing any prior negative homeowner experiences reported. Once a partner passes due diligence, prior to allowing them to offer PACE, we require that all their sales people take and pass our mandatory residential PACE training. Dividend controls successful project execution using a detailed list of eligible energy and water efficient products and services, reviewing project details for discrepancies in pricing or scope, and withholding funding until a homeowner signs off that the work has been satisfactorily completed. Eligible improvements are based on applicable state law and the US Department of Energy, the Environmental Protection Agency, non-profit trade associations, and other federal and state government agencies. Dividend maintains a partner complaint management system which will assist customers in remedying issues with installers and which will have problem installers removed from our network.

Guiding Marketing and Homeowner Communications

Dividend takes care to properly communicate and disclose the program features and benefits in its marketing to homeowners. We are clear with customers about the impacts of having a PACE assessment placed on their home. Dividend is cautious about not representing PACE as a government program, overstating potential tax advantages, energy savings, and we are candid about the potential impacts the assessment could have on a home mortgage or on the ability for customers to sell their home.