POLICY · VERSION 6.1 · 2026

Code of Ethics

National Collateral Examiners

A division of Bridgeport Advisors, LLC

Version V6.1 **Effective** 2026 **Applies to** All examiners and personnel

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> Dear Examiner, please read through this Code of Ethics and indicate your acceptance and understanding by signing and dating the acknowledgment on the last page. Thank you.

01 Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, customers and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

02 Examiner Independence and Objectivity

Lenders rely on NCE examinations to make credit decisions. Every examiner must be, and must be seen to be, independent of the borrower under examination.

- An examiner may not perform an examination of a borrower in which the examiner or a close family member holds an ownership interest, a debt or creditor position, employment, a board seat or an advisory role, or with which the examiner has had such a relationship in the past three years.
- Any personal, family, financial or prior business relationship with the borrower, its owners or its officers must be disclosed to the Managing Partner and to the engaging lender before field work begins.
- NCE fees are set by the engagement letter and are never contingent on the results of an examination, the borrowing base produced, or whether a loan closes.
- Examiners may not accept gifts, meals, entertainment, lodging, travel or any other courtesy from a borrower under examination, other than modest working refreshments provided on site.
- Examiners may not solicit or accept any other engagement from a borrower while an examination is in progress, or within twelve months after the report is delivered, without the written consent of the engaging lender.
- Examiners may not make or arrange loans, investments or other financial transactions with a borrower, its owners or its employees.

03 Integrity of Examinations and Reports

An NCE report states what the examiner found. Findings, ineligibles and recommendations are supported by work papers and are never altered to satisfy a borrower, a lender or any other party.

- Examiners will not omit, soften or change a finding at the request of a borrower or lender. Factual corrections supported by documentation are made; requests to change conclusions are declined and noted in the work papers.
- Any limitation on scope, including records not provided, procedures that could not be completed, or information not verified, is disclosed in the report.
- Borrower representations are identified as representations and are not presented as verified facts.
- Work papers support every figure in the report and are retained according to NCE's record retention requirements.
- Any attempt by a borrower to mislead the examiner, withhold records or influence the results is reported to the engaging lender.

04 Respect for the Individual

We all deserve to work in an environment where we are treated with dignity and respect. National Collateral Examiners (NCE), a division of Bridgeport Advisors, LLC, is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

NCE is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to the Managing Partner using the contact information in the Reporting a Concern section of this Code.

05 Create a Culture of Open and Honest Communication

At NCE everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

NCE will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

WHISTLEBLOWER POLICY

Employees are encouraged, in the first instance, to address such issues with their engagement lead, as most problems can be resolved swiftly. If for any reason that is not possible, or if an employee is not comfortable raising the issue with his or her engagement lead, the Managing Partner operates with an open-door policy.

REPORTING A CONCERN

Ethics concerns, suspected violations of this Code, harassment or discrimination complaints, conflicts of interest, security incidents and media inquiries are reported to:

Name Dennis Henry, Managing Partner

Email dennis.henry@ncexaminers.com

Phone 425-442-0893

Reports may be made in writing or by phone and are kept confidential to the extent permitted by law. Reports that involve the Managing Partner may be made directly to the engaging lender's relationship manager.

06 Set Tone at the Top

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At NCE, we want the ethics dialogue to become a natural part of daily work.

07 Uphold the Law

NCE's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law, industry standard or NCE policy, we should seek advice from the appropriate resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

08 Competition

We are dedicated to ethical, fair and vigorous competition. We will sell NCE products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for NCE or the sale of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

09 Anti-Bribery and Corruption

NCE prohibits bribery in every form. No one associated with NCE may offer, promise, give, request or accept anything of value to improperly influence a business decision, obtain or keep business, or secure any improper advantage. This applies to dealings with lenders, borrowers, suppliers, government officials and their representatives. NCE complies with the U.S. Foreign Corrupt Practices Act and all other applicable anti-bribery laws. Facilitation or “grease” payments are not permitted.

10 Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire by improper means a competitor’s trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

11 Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to NCE, its customers, its examinations, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

12 Confidentiality of Lender and Borrower Information

Examiners receive financial statements, customer and vendor lists, bank records, payroll data and other nonpublic information from lenders and borrowers. This information is used only to perform the engagement and is handled under the NCE Security Policies and Procedures, Version 6.1 (2026).

- Lender and borrower information is disclosed only to the engaging lender, or to others the engaging lender authorizes in writing.
- Reports and work papers are delivered only through the secure methods set out in the Security Policies and Procedures.
- Information from one examination is never used in, or disclosed during, another engagement.

- Sample reports used in marketing or proposals are redacted so that no borrower, lender, individual, location or deal term can be identified.
- The duty of confidentiality continues after an engagement ends and after an examiner's association with NCE ends.

13 Securities Trading

Examiners may learn material nonpublic information about borrowers, lenders or their customers that are publicly traded. No one associated with NCE may buy or sell securities of any company while in possession of material nonpublic information about that company, or pass that information to anyone else who may trade on it. This restriction applies until the information has been publicly disclosed.

14 Health and Safety

NCE is dedicated to maintaining a healthy environment. Examiners working at borrower facilities follow the borrower's site safety rules and report any unsafe condition or injury to the Managing Partner immediately.

15 Avoid Conflicts of Interest

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of NCE may conflict with our own personal or family interests. We owe a duty to NCE to advance its legitimate interests when the opportunity to do so arises. We must never use NCE property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with NCE.

Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with NCE.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any NCE transaction.
6. Placing company business with a firm owned or controlled by an NCE employee or his or her family.

7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all NCE employees.

Disclosure and Annual Certification

Any actual or potential conflict of interest must be disclosed in writing to the Managing Partner as soon as it is known, and in every case before accepting an examination assignment. Each examiner and associate re-certifies compliance with this Code and discloses any conflicts annually, and whenever this Code is revised, using the Conflict of Interest Disclosure on the last page.

Gifts, Gratuities and Business Courtesies

NCE is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by NCE was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom NCE does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of NCE or customers, or would cause embarrassment or reflect negatively on NCE's reputation.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our employment are offered because of our positions at NCE. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at NCE to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that NCE maintains or may establish a business relationship with.

Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when NCE is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain NCE business.

Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.

- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Gifts

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom NCE does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than $100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to the Managing Partner.

Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon NCE. An employee may never use personal funds or resources to do something that cannot be done with NCE resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of NCE.

16 Set Metrics and Report Results Accurately

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation of such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform the Managing Partner if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping

We create, retain and dispose of our company records as part of our normal course of business in compliance with all NCE policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with NCE's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any authorized audit, nor interfere with any auditor engaged to perform an internal independent audit of NCE books, records, processes or internal controls.

17 Promote Substance Over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At NCE, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that NCE is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we should do so.

Although NCE's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

18 Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the Managing Partner.

NCE takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

19 Be Loyal

Confidential and Proprietary Information

Integral to NCE's business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential suppliers and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent NCE are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the NCE network and our fellow employees, NCE reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or NCE's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

Media Inquiries

From time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Managing Partner. No one may issue a press release without first consulting with the Managing Partner.

20 Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the NCE guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?

Acknowledgment

I acknowledge receipt of the National Collateral Examiners Code of Ethics, Version 6.1 (2026). I have read each page, understand the company's requirements and agree to abide by them.

Conflict of Interest Disclosure

Check one:

☐ I have no actual or potential conflicts of interest to disclose.

☐ I have the following actual or potential conflicts of interest to disclose:

Signature

Date

Printed Name

Title