

## Genworth's Compliance Training Program Practices and Procedures

### Compliance Training Purpose

The purpose of compliance training is to educate employees and contractors on the laws, regulations and company policies that apply to their day-to-day job responsibilities.

### Compliance Training Process

Certain compliance training is mandatory and required for all associates. Additional mandatory training is required based on function and role. Methods for employee compliance training are web-based and face-to-face. New training is developed by Genworth Financial or Genworth Mortgage Insurance as needed, based on new regulations and policies. See the "Genworth USMI Training Course Listing" below.

### Integrity First, Genworth's Code of Ethics

All employees are required to complete training on Genworth's Code of Ethics, *Integrity First*. The Code of Ethics provides a general statement of conduct and values intended to provide guidance to all employees and assist them in their obligation to comply with applicable laws and regulations. Every employee is responsible for developing a working knowledge of all the policies in the Code of Ethics and a detailed understanding of the policies that apply to their specific job responsibilities.

### Compliance Monitoring and Oversight

All newly hired Genworth employees are required to complete core compliance training within a prescribed time frame. Existing employees receive annual and biennial courses along with any required job-specific training. The courses are assigned, deadlines are provided and progress is monitored to ensure completion. Using an internal reporting application, incompletes are escalated to immediate manager, then to the Compliance Officer and Human Resources, and ultimately to the Chief Executive Officer. On average, our completion rate for required compliance training is >90%. See the Sample Course Report.

### Compliance Documentation

The following documents are referenced in the discussion above:

- Genworth USMI Training Course Listing
- *Integrity First*, Genworth's Code of Ethics
- Sample Course Report

Last updated 2/4/2019

## Genworth USMI Training Course Listing

Course Name	Audience
<i>Integrity First</i> Acknowledgment	All Employees
<i>Integrity First</i> Training	All Employees (including New Hires)
Anti-Corruption (FCPA & UK Anti-Bribery Act)	Employees in target functions
Competitive Intelligence/Anti-Trust	Employees in target functions
Document Creation / Records Management	All Employees (including New Hires)
Harassment Prevention for Employees	All Employees
California Fair Claims Practices	Employees in target functions; Investigations, Delinquency Reporting, Claims, HOA and Compliance
<i>Integrity First</i> Training for Contractors	All Contractors
USMI Anti-Fraud State Required Training	Employees in target functions; Investigations
USMI Anti-Money Laundering (AML)	Employees in target functions; Lender Servicing, Sales Analytics, Accounting, Finance, Risk
USMI US Fair Lending	Employees in target functions; Account Managers, Sales Training, Underwriting, Customer Relations
USMI Unfair, Deceptive or Abusive Acts and Practices (UDAAP)	Employees in target functions; Marketing, Products, Sourcing, Customer relations
USMI Fraud Awareness	New Hires & Employees in target functions; ActionCenter, Claims, HOA, New Hires
USMI Office of Foreign Assets Control	New Hires
USMI Privacy Refresher	All Employees (including New Hires)
USMI Real Estate Settlement Procedures Act (RESPA)	New Hires & Employees in target functions; Sales
Enhanced Data Security Training	All Employees (including New Hires)
Security Awareness - Modules	All Employees (including New Hires)
USMI Fair Debt Collection Practices Act (FDCPA)	Employees in target functions; HOA

<b>Integrity First and Data Security Acknowledgment (US Only) 2018</b>							
<b>Person Full Name</b>	<b>Person Person No</b>	<b>Person Start Date</b>	<b>Registration Date</b>	<b>Date Marked Complete</b>	<b>Course Target Date</b>	<b>Manager E-mail</b>	<b>Manager's Manager Name</b>
			15-Oct-2018	31-Oct-2018	31-Oct-2018		
			15-Oct-2018	18-Oct-2018	31-Oct-2018		
			15-Oct-2018	15-Oct-2018	31-Oct-2018		
			15-Oct-2018	17-Oct-2018	31-Oct-2018		
			15-Oct-2018	16-Oct-2018	31-Oct-2018		
			15-Oct-2018	15-Oct-2018	31-Oct-2018		
			15-Oct-2018	17-Oct-2018	31-Oct-2018		
			15-Oct-2018	26-Oct-2018	31-Oct-2018		
			15-Oct-2018	25-Oct-2018	31-Oct-2018		
			15-Oct-2018	26-Oct-2018	31-Oct-2018		