



Enact'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 Enact as needed, based on new regulations and policies. See the "Enact Training Course Listing" below.

Integrity First, Enact's Code of Ethics

All employees are required to complete training on Enact'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 Enact 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 the immediate manager, then to the Chief 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:

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

Last updated 6/21/2021

Enact USMI Training Course Listing

Course Name	Audience
<i>Integrity First</i> Acknowledgment	All Employees
Acceptable Use Training	New hires, employees, and contractors
<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
California Consumer Privacy Act	Employees in target functions; Action Center, 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
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
Office of Foreign Assets Control (OFAC)	New Hires
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
USMI 101	New Hires
Social Media 101	New Hires

Integrity First for US Employees - Annual (2020)				
Person Full Name	Person Person No	Date Marked Complete	Course Target Date	Person Business Card Title
		16-Oct-2020	19-Oct-2020	
		22-Sep-2020	19-Oct-2020	
		22-Sep-2020	19-Oct-2020	
		22-Sep-2020	19-Oct-2020	
		08-Oct-2020	19-Oct-2020	
		05-Oct-2020	19-Oct-2020	
		15-Oct-2020	19-Oct-2020	
		07-Oct-2020	19-Oct-2020	
		08-Oct-2020	19-Oct-2020	
		19-Oct-2020	19-Oct-2020	
		02-Oct-2020	19-Oct-2020	
		04-Oct-2020	19-Oct-2020	

Enact Mortgage Insurance underwriters include:
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