

PFN Lending Group Inc. dba Priority Financial Network

Revised April 10, 2025

DO-NOT-CALL (CONTACT) Policy & Procedures Manual

Policy Statement

The Federal Communications Commission (FCC) has established a national "Do-Not-Call" registry and other regulations pursuant to the Telephone Consumer Protection Act (TCPA). The impact of the FCC regulations is to prohibit all commercial telemarketers from calling any phone number on the registry without being subject to financial penalties.

For those numbers not on the registry, the regulations set a maximum rate on the number of abandoned calls (those outbound calls that connect with a recipient but are disconnected before any conversation occurs) and require telemarketers to transmit caller ID information. The regulations also modify the FCC's unsolicited facsimile advertising requirements, which in turn were modified by the Junk Fax Prevention Act.

Priority's Policy – Do Not Contact

PFN Lending Group, Inc., dba Priority Financial Network ("Priority") is committed to honoring the requests of its current and prospective customers. In support of this commitment and pursuant to regulations set forth by the Federal Communications Commission ("FCC"), the Company's Board of Directors has adopted the following policy. This policy statement will be provided to our customers upon request.

Priority has expanded the Do Not Call list to "Do Not Contact" ("DNC") as we have received complaints from consumers due to unwanted emails, which follow the same TCPA regulations.

Priority maintains a record of the name and contact telephone number(s) for consumers who do not wish to be called. If a consumer does not want to receive sales calls from Priority, they may request Priority to place their telephone number(s) on the Company's "Do-Not-Contact" list. In compliance with federal and state laws, a telephone number will be removed within 30 days, from any sales programs that are currently underway and from future sales campaigns.

1. The request can be in writing or by phone, and must include, at a minimum, any telephone number(s) the consumer is requesting be placed on the Priority "Do-Not-Contact" list.

2. A consumer will remain on the Priority "Do-Not-Contact" list for five years, unless a request is made to have the name and phone number removed.
3. If a telephone number ever changes, a consumer must give Priority the new information for the "Do-Not-Contact" status to remain in effect.
4. The same steps, 1 through 3 above, apply to emails.
5. A text message is considered a call per the TCPA.

When Priority solicits prospective customers, we also honor "Do-Not-Call" requests on behalf of consumers listed on the National Do-Not-Call Registry maintained by the Federal Trade Commission and various state-agency lists. Many State's "Do-Not-Call" regulations permit companies to contact their own customers even though they are on these "Do-Not-Call" lists.

Therefore, a customer may be contacted by us even though they are on a state or the national "Do-Not-Call" list. If a consumer does not wish to be contacted by Priority even though they are a customer, they may be placed on the Priority's "Do-Not-Contact" list and the request will be honored for Priority's solicitations/advertising. Contact with a borrower for issues regarding their existing loan originated by Priority may continue in order to properly service the loan as needed.

Being on the Priority's "Do-Not-Contact" list means that a consumer will not receive sales/marketing calls, texts, faxes or emails by anybody representing Priority (or a dba of Priority).

Corporate/Servicing may still contact a consumer, however, for non-solicitation purposes. This would include things like surveys, billing, and other service-related matters.

All employees that engage in outbound telephone solicitation are trained in this policy and are made aware of these procedures before they are allowed to place calls to consumers.

General Requirements

TCPA provides consumers with options to avoid unwanted telephone solicitations and addresses the following:

1. A safe harbor exists for an inadvertent violation of this requirement if the telemarketer can demonstrate that the violation was an error and

that its routine practices include:

- A. Written procedures;
 - B. Training of personnel;
 - C. Maintenance of a list of telephone numbers excluded from contact;
 - D. Use of a version of the national Do-Not-Call registry obtained no more than three months prior to the date any call is made (with records to document compliance); and
 - E. Process to ensure that it does not sell, rent, lease, purchase or use the Do-Not- Call database in any manner except in compliance with regulations.
2. Companies must maintain company specific Do-Not-Call lists reflecting the names of customers with established lending relationships who have requested to be excluded from telemarketing. Such requests must be honored for five years.
 3. Telemarketing calls can only be made between the hours of 8:00 a.m. and 9:00 p.m. (local time at the called party's location).
 4. All telemarketers must comply with limits on "abandoned calls" and employ other consumer- friendly practices when using automated telephone dialing equipment. A telemarketer must abandon no more than three percent of calls answered by a person and must deliver a prerecorded identification message when abandoning a call. Two or more telephone lines of a multi-line business are not to be called simultaneously. Telemarketers must disconnect an unanswered telemarketing call prior to at least 15 seconds or four rings. All businesses that use auto-dialers to sell services must maintain records documenting compliance with call abandonment rules.
 5. All prerecorded messages, whether delivered by automated dialing equipment or not, must identify the name of the entity responsible for initiating the call along with the telephone number of that entity that can be used during normal business hours to ask not to be called again. Note: Priority does not use prerecorded messages or auto-dialers.
 6. All telemarketers must transmit caller ID information when available and must refrain from blocking any such transmission(s) to the

consumer.

7. Unsolicited fax transmissions must be preceded by the advertiser's receipt of the express written permission and signature of the intended recipient. There is no exception for an "existing business relationship," nor can the express permission be conveyed through a "negative option." Businesses that advertise by fax are required to maintain records demonstrating that recipients have provided express permission to send fax advertisements.

In the event of any question regarding the provisions of applicable law or this Do-Not-Contact Policy and Procedures, contact the Compliance Department for guidance – compliance@priorityfinancial.net.

Management reviews the policy with its employees on a regular basis. The methods and procedures in this “Do-Not-Contact” policy are reviewed by Priority on an annual basis. It is the policy of Priority to adhere to all the provisions of these regulations by implementing this policy and subsequent procedures.

Removal Requests and Complaints

Customers requesting to be placed on Priority’s “Do-Not-Contact” list, as well as Priority’s “Opt-Out” list may do so by phone (818-226-1300), by e-mail to consumerfeedback@priorityfinancial.net or compliance@priorityfinancial.net or by US Mail to Priority Financial Network, 5016 N Parkway Calabasas, Suite 200, Calabasas, CA 91302-2598.

Complaints shall be forwarded by any Priority employee or contractual third-party entity to the Compliance Manager and handled in accordance with the Company’s complaint policy.

If a consumer requests a copy of Priority Financial Network’s “Do-Not-Call” policy, a copy of this Do Not Contact policy will be sent via U.S. mail or email within 30 days.

Prior Express Consent vs. Prior Written Consent

In general, the FCC has found that a borrower/applicant releasing their phone number to Priority implies prior express consent to be contacted “regarding” that transaction, absent contrary instructions.

Prior express written consent requires a signature on a written agreement

that clearly and conspicuously discloses that:

- The user of the phone number agrees to receive autodialed and prerecorded telemarketing calls and/or texts to a specific number from a specific caller
 - Priority requires all borrowers to sign a Borrower Contact Consent Form with all loan closing documents.
 - Priority does not use prerecorded messages or auto-dialers.
- Their consent is not a condition for purchase (obtaining a loan). Prior express written consent can be revoked at any time through any reasonable means. Electronic signatures are permissible so long as they are obtained in compliance with the E-SIGN Act.
 - Priority requires all applicants to sign an eConsent Form at the beginning of all loan transactions.