Boxwood Mortgage LLC

Office of Foreign Assets Control (OFAC) Compliance Policy

1. Purpose

To ensure compliance with all sanctions programs administered by the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) and to prevent Boxwood Mortgage LLC from conducting business with prohibited persons, entities, or countries.

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2. Policy Statement

Boxwood Mortgage LLC will comply with all applicable OFAC regulations and sanctions programs and will not knowingly conduct business with any person, entity, or organization identified on OFAC sanctions lists, including the Specially Designated Nationals and Blocked Persons List (SDN List).

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3. Individuals Subject to Screening

At a minimum, the following parties shall be screened:

- Borrowers
- Co-borrowers
- Guarantors
- Sellers
- Business entities involved in the transaction
- Any additional parties required by investors, lenders, warehouse banks, or applicable law

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4. Timing of Screening

OFAC screening shall be performed:

- At application or loan submission;

- Prior to closing;
- Prior to funding, if required by the investor or lender.

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5. Sources Used for Screening

Boxwood Mortgage LLC may utilize:

- LOS integrated OFAC screening;
- Investor or lender OFAC screening systems;
- Settlement agent screening;
- The U.S. Treasury OFAC Sanctions List Search tool.

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6. Potential Matches

If a potential OFAC match is identified:

- Loan processing shall immediately cease.
- The Compliance Manager shall review the potential match.
- Additional identifying information shall be obtained as necessary.
- Funding or closing shall not occur until the match is resolved.
- Confirmed matches shall be handled in accordance with OFAC requirements and applicable law.

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7. Responsibilities

Geroldine "Patti" Contrasto, President and Compliance Manager, is designated as the OFAC Compliance Officer and is responsible for:

- Oversight of the OFAC Compliance Program;
- Employee training;
- Annual review of procedures;
- Maintenance of records.

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8. Training

Employees involved in origination, processing, underwriting, or compliance shall receive OFAC training upon hire and periodically thereafter.

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9. Record Retention

Documentation of OFAC screening and any investigations relating to possible matches shall be maintained in accordance with the Company's Record Retention Policy and applicable federal and state regulations.

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10. Program Review

This policy shall be reviewed annually and updated as necessary to reflect regulatory changes and operational risks.

Approved this July 2026.

Geroldine "Patti" Contrasto

President and Compliance Manager

Individual NMLS #294661

Boxwood Mortgage LLC

Company NMLS #1824674

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