



Regulatory Change Management Policy

INTRODUCTION

Wishes monitors new and changing laws, regulation, guidance and industry standards to ensure appropriate and timely implementation of changes impacting our business.

The scope of Wishes Regulatory Change Management Program includes all relevant legislative and regulatory changes that impact our technology and business activities. This Regulatory Change Management Policy does not include the process for making technical changes to our systems or technology.

GOVERNANCE AND OVERSIGHT

The Board of Directors is responsible for creating a culture of compliance and ensuring appropriate resources are provided to review, analyze and implement applicable regulatory changes that impact Wishes business operations. The Board will formally adopt this policy on at least an annual basis as part of the Compliance Management Program.

Senior Management is tasked with implementing applicable regulatory changes in a timely and effective manner, ensuring the control environment is designed in a way as to encourage compliance with all laws, regulations, guidance and industry standards. Management is responsible for ensuring the Board is provided adequate information on regulatory change activities through periodic reporting and issue escalation, should material defects be identified.

POLICY STATEMENT

It is Wishes policy to monitor new and changing laws, regulations, guidance and industry standards and ensure appropriate and timely implementation of applicable changes.

CHANGE MANAGEMENT PROGRAM

To effectively manage regulatory change, Wishes has developed this Change Management Program that assures awareness of the current regulatory environment and identifies changes,

assesses the impact of any change and provides for implementation and validation of any resulting changes to our technology, products or services.

To facilitate the Regulatory Change Management Program, Wishes maintains an inventory of regulatory changes. As applicable, regulatory changes are identified and communicated throughout the organization, the following information is maintained and shared with impacted areas:

- Date of Review
- Agency/Source of change
- Law/Regulation/Guidance impacted
- Summary of Change
- Product/Feature Affected
- Business Lead for Implementation
- Action Required, if any
- Action Owner
- Estimated Due Date
- Completion Date
- Validation Date

Change Identification

To ensure that regulatory changes are appropriately identified, Wishes will:

- Maintain an inventory of applicable regulations affecting the company either directly or indirectly (See **Regulatory Risk and Control Assessment**);
- Monitor regulatory publications for new and updated requirements;
- Review news of regulatory changes and compliance breaches;
- Evaluate regulatory enforcement activity; and
- Maintain relationships with regulators, industry peers, advisors and customers.

Impact Analysis

Wishes will, in consultation with internal/external counsel or compliance professionals when appropriate, review and interpret new and updated regulatory requirements.

The impact analysis, in addition to identifying the consequences of noncompliance, is designed to identify the gap between current business processes and system controls and those required under new or updated requirements. Wishes ensures all appropriate stakeholders participate in the development of changes to our products, services, business practices, and technology, to facilitate compliance with applicable requirements.

Implementation

Changes to Wishes products, services, business practices and technology are implemented by the Action Owner with proper approval of Senior Management.

INTERNAL CONTROLS

The Compliance team is responsible for ensuring adherence to this policy by maintaining the regulatory change management information. On a quarterly basis, or more frequently when necessary, the Compliance Officer or his/her designee will update the tracking sheet. The Compliance team is responsible for ensuring changes are effectively communicated across the organization and appropriate controls are implemented to ensure compliance with the update.

VERSION CONTROL

Version 1.1

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