

MEMORANDUM

Date: 01 November 2021
To: All Employees
From: Kyle Gunderlock, Chief Executive Officer
RE: Benefits for Employees with Notary Licenses
Employees with Change of Address

Acra Lending (“Acra” or the “Company”), a DBA of Citadel Servicing Corporation, has two (2) points within our employee handbook that are in need of reiteration and a reminder to our employees.

- (1) Multiple employees are individually licensed as Notary Publics.

Acra has a formal policy to reimburse active employees for education expenses and license related fees where the benefit of said licensing is a requirement of an employee’s job function is utilized for the Company’s benefit. This policy includes licensing for Notary Publics where employee is available to the office on a regular, ongoing, and consistent basis.

Unique to Notary Licenses, Acra is agreeable – as it does not conflict with the performance of their employee related duties – for employees to utilize said license separately and on their own time to notarize documents externally. This work should be conducted for others during non-work hours.

However, as a point for clarification, the Company does not separately pay employees to perform notarizations on a per signature basis. This is akin to paying for a separate second job while also performing their regular role.

This memorandum replaces and supersedes any prior arrangements.

- (2) During the past 18-months, in part given the increased opportunity to work for home, many employees have enjoyed the ability to relocate their primary residence while maintaining employment with the Company. Managers have also had the ability to hire from a talent pool that is decentralized and geographically diverse.

Regardless, employees are required to inform the Company in advance of any proposed move. Further, the Company reserves the right to agree or not to any potential move by employee(s). This is necessary given multiple factors including, as example, setting appropriate licensing or jurisdictional tax ramifications for the employee’s withholdings. If an employee's proposed move would be a hardship to the position, the Company will work in good faith with the Employee to evaluate alternatives with the employee including potentially different roles, optional work accommodations, or – where a move is inappropriate and a role cannot be adjusted – resignation / termination of the work relationship.

Given the compliance ramifications, Employees failing to notify Human Resources in advance of their move are subject to disciplinary action.

Employees should reach out to the Human Resources Department directly with any questions regarding these existing policies or the contents of this Memorandum.