



## **Radian Group Inc.**

### **Workplace Conduct Policy**

#### **Purpose**

The purpose of the Workplace Conduct Policy, which is part of Radian's Code of Conduct and Ethics (the "Code"), is to further enhance the Code, to advise you of your responsibilities for workplace conduct, to establish clear guidelines for workplace conduct, and to enhance overall understanding of appropriate workplace conduct.

#### **Scope**

This Policy covers all employees and officers of the Radian Group Inc., its subsidiaries, and controlled affiliates ("Radian", the "Company" or "We"), whether full-time, part-time, temporary or contract and all directors. The obligations of the directors are the same as those of Radian employees under this Policy. (Any reference to "you" in this Policy includes all these individuals.)

#### **Policy**

##### **Equal Employment Opportunity**

Radian recognizes the freedom, rights, and dignity to which each individual employee and applicant for employment is entitled. It is a violation of this Policy and applicable laws to make employment decisions based upon your or an applicant's race, creed, color, age, gender identity or expression, marital status, national origin, ethnic heritage, religion, sexual orientation, or veteran status. It is also a violation of this Policy and applicable laws to retaliate against you or an applicant for making any complaint about, or for opposing, any allegedly discriminatory conduct, when the individual making the complaint or opposing the conduct does so on a good-faith belief that he or she is complaining about or opposing unlawful practices and such individual expresses his or her complaints or opposition in a reasonable manner. If you have doubts about whether any complaints or expressions of opposition are protected, you should assume that they are protected, unless you are informed by the Human Resources Department, the Legal Department, or the Chief Compliance Officer that such conduct is not protected.

Radian is committed to providing equal employment opportunities. Each department manager is responsible to ensure that this Policy is followed.

##### **Nepotism and other Personal Relationships**

No two employees who are in a personal relationship with each other can be in a direct or indirect reporting relationship. Furthermore, individuals in personal relationships may not work in the same department or in positions that may compromise internal audit separation of responsibilities objectives. No exceptions to this policy will be permitted without the advance review and approval of the Human Resources Department and the Executive Leader. For purposes of this section, a "personal relationship" includes a spouse, parent, step parent, parent-in-law, child, step child, sibling, sibling-in-law, aunt, uncle, grandparent, grandchild, legal guardian, niece, nephew, fiancé/partner of any gender, or a person with whom one has a romantic relationship. This policy is intended to ensure fair and equitable treatment of you and to avoid potential conflicts of interest, criticism, and employee morale problems. You are encouraged to seek guidance from the Human Resources Department about potential conflicts caused by



these types of relationships.

## **Harassment**

Radian is committed to maintaining a work environment that is free of any form of employee harassment based on gender, race, creed, color, religion, national origin, ethnic heritage, age, marital status, sexual orientation, gender identity or expression veteran status or any other unlawful basis.

Harassment is unacceptable in Radian's offices or in other work-related settings such as business trips, business meals and business-related social events. Harassment can be perpetrated by a fellow employee, a supervisor or a non-employee who conducts business with the Company (such as a vendor or customer).

Experience has shown that harassment can occur not only when one individual deliberately intends to harass or "pick on" another person, but also when individuals believe they are "just kidding," or when they make jokes or commit pranks that they think are funny but do not realize are offensive to others. If you overhear such statements or witness such conduct, you may be initially reluctant to "make an issue" out of such behavior, and thus the offending party perhaps might believe incorrectly that no one was offended by his/her conduct. These problems can be avoided if you use discretion, good taste, common sense, and basic courtesy at all times in and outside the workplace.

Thus, this Policy strictly prohibits any kind of banter or jokes in or outside the workplace that are of a racial, ethnic, sexual, or religious nature, or that pertain to such subjects as disabilities, sexual orientation, gender identity or expression, or a person's personal characteristics or background. Claiming that other employees were participating in such conduct or that no one complained or seemed offended at the time will not be an acceptable defense under this Policy.

All officers, managers and supervisors are responsible for implementation of this Policy and for ensuring that all employees they supervise have knowledge of and understand the Policy. Radian requires the reporting of all incidents of harassment. The initiation of a complaint, in good faith, shall not, under any circumstances, be grounds for discipline. It is a violation of this Policy and applicable law for an individual to be disciplined or otherwise disadvantaged as a result of the good-faith resort to the complaint procedure.

California employees who believe they have been subjected to sexual harassment may also contact the local office of:

The California Department of Fair Employment and Housing ("DFEH") at 611 West Sixth Street, Suite 2850, Los Angeles, CA 90017 Tel. (213) 439-6751; or

The California Fair Employment and Housing Commission ("FEHC") at 455 Golden Gate Ave., Suite 14500, San Francisco, CA 94102

to file a claim within one year of the harassment instead of following the complaint procedures outlined here. The DFEH and/or FEHC serve as neutral fact finders and will attempt to assist the parties to voluntarily resolve their disputes. If the DFEH or FEHC is unable to obtain voluntary resolution and finds that harassment has occurred, such agencies may award reinstatement or monetary damages.

Harassment can take any form. Some examples are discussed below.



### **Verbal or Visual Harassment**

This includes derogatory or vulgar remarks about a person's race, creed, color, age, gender, marital status, national origin, religion, ethnic heritage, sexual orientation, gender identity or expression, veteran status, physical or mental disability or physical appearance; threats of physical harm and production and/or distribution of graphic material having such effect.

### **Physical Harassment**

This includes hitting, pushing, aggressive physical conduct or threats to take such action.

### **Sexual Harassment**

Sexual harassment refers to unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or service; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. Any conduct of the type described above is a violation of this Policy, regardless of whether or not submission to such conduct is made a condition of employment or service.

Depending on the circumstances, sexual harassment may include, for example, unwanted sexual advances; subtle or overt pressure for sexual favors; sexual jokes, flirtations, innuendos, advances or propositions; graphic or suggestive commentary about an individual's body, appearance, sexual prowess or sexual deficiencies; leering, whistling or unwelcome physical contact; suggestive, insulting or obscene comments or gestures; unwelcome gifts; unwelcome questions about a person's sex life, dating relationships or sexual preferences; and the display or distribution in the workplace of sexually suggestive or demeaning objects, pictures, articles or other items.

Radian will not accept as an excuse to a complaint of sexual harassment that an employee was "only joking" or "didn't think the other employee would object."

### **Hostile Work Environment**

Conduct that has the purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile or offensive working environment is a violation of this Policy. If you feel that you may be a victim of, or are aware of, a hostile work environment situation, you should contact the Human Resources Department, Chief Compliance Officer, Chief Human Resources Officer or General Counsel.

### **Employee Safety**

Radian is committed to providing you with a safe workplace.



## **Violence in the Workplace**

Any type of violent behavior including any threats, threatening language or any other acts of aggression or violence made against you, client, visitor or anyone by anyone while on Radian premises or conducting Radian business is absolutely prohibited. Threats of violence include throwing objects, menacing gestures, damaging property, flashing weapons, stalking or verbal or physical abuse. Possession of any firearms, knives, explosives or other weapons or dangerous materials is absolutely prohibited.

If you witness or are the victim of violent behavior or threats of violence, you must report the information to your immediate manager, the Human Resources Department, the Compliance Officer, the Senior Human Resources Executive, or the General Counsel immediately.

If you are aware of a potential risk of violence at Radian from an individual not related to Radian (such as an ex-spouse, partner, boyfriend or girlfriend or any other person), you are strongly encouraged to report that information to your immediate manager or to Human Resources. If you have obtained a protective or restraining order that lists Radian's locations as protected areas, you must provide a copy of the order to the Human Resources Department or General Counsel.

## **Cell Phone Usage**

The need for a cell phone is crucial in the productive day-to-day activities of certain of you at Radian. Although Radian acknowledges the need to have the cell phone accessible to certain of you at all times during the workday, your safety and that of any bystanders must take a priority.

Radian discourages employees from using a cell phone while driving an automobile. If you choose to use a cell phone while driving in an area that allows such use, you must adhere to all state and local laws in this regard. Radian recommends using a hands-free device to mitigate safety concerns and finding a proper parking space prior to using the cell phone. Parking on the side of a road is not acceptable except in the case of genuine emergencies such as an accident or automobile breakdown. As a reminder, proper use of cell phones is only one aspect of safe driving. You should operate the automobile in a safe manner at all times.

## **Substance Abuse**

Radian is committed to providing a safe workplace and to establishing policies that promote and encourage high standards of employee health and safety. It is impossible to maintain a safe, healthy working environment if you allow the use of alcohol or drugs to interfere with the performance of your job or Radian's operations. The use, sale, purchase, possession, or transportation of illegal drugs on Radian property, during working hours, or while on Radian business is expressly forbidden. The proper use of drugs or medicine prescribed by a licensed physician for you is permitted but must not affect work performance. Similarly, you are expected to be responsible in your use of alcohol, and any excessive use of alcohol is also expressly prohibited. A very moderate use of alcohol may be customarily appropriate when entertaining during a Radian-sponsored event or when entertaining Radian customers, even on Radian premises. At these times, Radian expects all behavior to remain within a prudent and conservative standard of professional, mature behavior.

You are encouraged to seek early assistance if you have drug, alcohol and/or personal problems. Radian offers you confidential access to an outside Employee Assistance Program. Your employment or service with Radian will not be jeopardized because of a request for help with a drug or alcohol abuse problem. If you have a drug and/or alcohol problem and refuse to report to an approved counseling or rehabilitation

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program or leave a treatment program before being released, you may be subject to immediate discharge from employment or service.

Radian reserves the right to require you to undergo a drug or alcohol test when Radian reasonably suspects that you are using drugs or alcohol in violation of this Policy.

Officers, managers, supervisors, and employees who may suspect a violation of Radian's substance abuse provisions of this Policy are expected to inform the Human Resources Department or their managers in a timely fashion. Any violation of the substance abuse provisions of this Policy should be reported to the Chief Compliance Officer, Chief Human Resources Officer or Human Resources Department.

### **Reporting and Investigation**

The workplace conduct requirements and related laws are complex, and employees should involve the Human Resources Department and the General Counsel or the Chief Compliance Officer where appropriate. You may also report such concerns using the Radian "How to Get Help" procedures set forth in the Code and may call the Radian Compliance Hotline at 800-523-1988 x 1700. Radian's commitment to non-retaliation set forth in the Code applies to any report made under this Workplace Conduct Policy.