

**GOVERNMENT OF PUERTO RICO
PUERTO RICO PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

NEPR

Received:

Nov 17, 2025

4:34 PM

IN RE: REQUEST FOR CERTIFICATION
BY PALMETTO SOLAR LLC

CASE NO. NEPR-CT-2025-0011

SUBJECT: Resolution and Order regarding
*Motion to Request Certification and Request for
Confidential Treatment* filed by Palmetto Solar
LLC

**MOTION IN COMPLIANCE WITH OCTOBER 17 RESOLUTION
AND ORDER AND REQUEST FOR CONFIDENTIAL TREATMENT**

TO THE HONORABLE ENERGY BUREAU:

COMES NOW, Palmetto Solar LLC ("Palmetto"), represented by the undersigned legal counsel, and respectfully submits the following:

1. On September 29, 2025, Palmetto filed before the Energy Bureau of the Puerto Rico Public Service Regulatory Board ("Energy Bureau") its *Motion to Request Certification and Request for Confidential Treatment* ("September 29 Motion") with several documents corresponding to its request for certification as an Electric Power Service Company.
2. On October 17, 2025, the Energy Bureau issued a Resolution and Order (the "October 17 R&O") whereby it certified Palmetto as an Electric Service Company and ordered Palmetto to submit a model customer bill and a procedure for customer objections within 30 days, as well as public/redacted versions of documents for which confidential treatment is sought within 10 days.
3. On October 24, 2025, Palmetto partially complied with the October 17 R&O and submitted a redacted version of the documents for which confidential treatment was sought.

Confidential Treatment Requested

4. In compliance with the other directive of the October 17 R&O, Palmetto respectfully submits the requested model customer bill and procedure for customer objections. (**Attachment 1**).
5. Palmetto hereby respectfully requests that confidential treatment be afforded to this motion and its corresponding attachments. Section 6.15 of Act No. 57 of May 17, 2014, as amended, also known as the “Puerto Rico Energy Transformation and RELIEF Act” (22 L.P.R.A. § 1054n), provides:

If a person having the obligation to submit information to the Energy [Bureau] understands the information to be submitted is privileged or confidential, [such person] may request said [Bureau] to give [privileged or confidential] treatment subject to the following:

(a) if the Energy [Bureau], after due evaluation, understands the information should be protected, it shall find a way to grant this protection in the manner that impacts less the public, transparency and the rights of the parties involved in the administrative proceeding under which the alleged confidential document is being filed.

(b) To such effects, the Energy [Bureau] may grant access to the document, or to portions of the document that are privileged, only to counsel and external consultants involved in the administrative proceeding after execution of a confidentiality agreement.

(c) The Energy [Bureau] shall keep documents presented before it completely out of public scrutiny only in exceptional cases. In such cases, the information shall be duly safeguarded and delivered exclusively to Energy [Bureau] personnel on a need-to-know basis, under non-disclosure rules. However, the Energy [Bureau] shall order that a non-confidential version for public review be submitted.

(d) Any claim of privileged or confidential information by a person under the jurisdiction of the Energy [Bureau] must be ruled in an expedited manner by the [Bureau] through a resolution to such effects, before any confidential information alleged by a party is disclosed.

Confidential Treatment Requested

6. In turn, Section 1.15 of the Amendment to Regulation No. 8618 on Certification, Annual Fees, and Operational Plans for Electric Service Companies in Puerto Rico, Regulation 8701 of the February 17, 2016 ("Regulation 8701").provides that when a person who is required to submit information to the Energy Bureau considers such information to be privileged or confidential, the person shall identify the information it deems privileged or confidential, request the Energy Bureau to protect such information, and present arguments supporting the privilege or confidentiality claim. The Energy Bureau shall evaluate the petition and, if it concludes the information merits protection, it shall proceed pursuant to Section 6.15 of Act 57-2014.
7. Palmetto respectfully requests that all the information contained in this motion and attached hereto be kept confidential in accordance with Section 1.15 of Regulation 8701. In compliance with the process to designate confidential information, Palmetto hereby includes redacted versions of the documents for which confidential treatment is sought. These documents have sensitive information, otherwise not available to the public, which Palmetto prefers not to disclose and that could place Palmetto at a competitive disadvantage.
8. Palmetto respectfully requests that this Honorable Energy Bureau only grant access to said information to internal Energy Bureau personnel, counsel, and consultants subject to the execution of a confidentiality agreement.

WHEREFORE, Palmetto Solar LLC respectfully requests that the Honorable Bureau take notice of this *Motion in Compliance with October 17 Resolution and Order and Request for Confidential Treatment*, declare Palmetto in compliance with the October 17 R&O, authorize Palmetto to offer energy services, and afford confidential treatment to this motion and its corresponding attachment.

Respectfully submitted, on November 17, 2025.

Confidential Treatment Requested

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ATTACHMENT 1



LIGHTREACH
(DBA OF PALMETTO LIGUETO PR
SA LLC)
P.O. BOX 78843
PHOENIX, AZ 85062-8843

Statement Date	10/01/2025
Account Number	1234567890
Amount Due	\$23.00
Billing Statement	

Please make corrections to address below



B_BCSTMTS_PLMETO_AP ▲ 0 0 2 9 7 2
Sample Customer
Address
Quebradillas PR 00678

Make Checks
Payable to:

LIGHTREACH
(DBA OF PALMETTO LIGUETO PR SA LLC)
P.O. BOX 78843
PHOENIX, AZ 85062-8843

37810100052176197836620000000000000000

If mailing in payment, please detach and return remittance with payment

Statement Date	Account Number		Amount Due	Due Date
10/01/2025	1234567890		\$23.00	10/31/25

Date	Description	Balance
	POWER PURCHASE AGREEMENT	\$23.00
	STATEMENT FEE	\$0.00
	AUTOPAY DISCOUNT REVERSAL	\$0.00

** Go to home.palmetto.com to setup your account on SurePay auto-pay today and save \$15 a month **

Your LightReach Solar Overview:

Solar System Size: 6 kW

Year 1 Estimated Production: 9000 kWh kWh Rate:

\$0.0562/kWh

Term: 20 years

Protect Plan Palmetto Protect Performance powered by Omnidian

Late fees will be assessed based on the terms of your agreement if payment is not received.

If you have any billing questions please reach out to billing@golightreach.com, for any other questions please reach out to help@golightreach.com.

Terms & Instructions

** Bank transfers, Checks or ACH payments can take up to 5-7 business days **

** The ACH information you provided in the Palmetto App or the web payment portal below will be used to make your payment automatically **

** If you pay by credit card, a pass through processing fee will be added to your Monthly Payment that is not for the benefit of Palmetto **

** If the contact information we have on file for you has changed, then please contact us to update our records **

For Payments & Billing Inquiries		For Correspondence Only:
Palmetto Toll Free	(855) 339-1831	LIGHTREACH (DBA OF PALMETTO LIGUETO PR SA LLC) 4343 N. SCOTTSDALE RD. #270 SCOTTSDALE, AZ 85251
Billing Fax	(480) 636-4997	
Palmetto Email	help@golightreach.com	
Billing Email	billing@golightreach.com	
Web Payments	home.palmetto.com	
Palmetto Hours of Operation	9am to 9pm EST Monday through Friday	

Billing Statement Addendum

Due Date: 10/31/2025

Right to Object:

Customers have the right to dispute the bill within thirty (30) days of receipt, pay the amount corresponding to the average of undisputed bills for the previous six (6) months, and request the electric power service company conduct an investigation. Customer may perform the foregoing without any interruption to its service. If there is not a billing history of at least six (6) months' worth of non-objected bills, the customer must pay an amount equal to the average of the preceding non-objected bills. In cases where the objected bill is the first bill the company has issued to the customer, the customer shall be exempt from payment at the time of filing the request for investigation or objection.

Objection Filing Methods:

Customers may file objections by any of the following methods:

1. Emailing billing@golightreach.com
2. Calling Palmetto Customer Support at (855) 339-1831
3. Mailing a written objection to Palmetto, P.O. Box 78843, Phoenix, AZ 85062-8843

Customer Service Contact Information:

Palmetto Customer Service
Email: help@golightreach.com
Phone: (855) 339-1831
Hours: Monday–Friday, 9:00 AM to 9:00 PM EST

Puerto Rico Energy Bureau and Independent Consumer Protection Office Contact Information:

Puerto Rico Energy Bureau (PREB)

Address: World Plaza Building, 268 Ave. Muñoz Rivera, Suite 202 (Plaza Level), San Juan, PR 00918
Telephone: (787) 523-6262
Email: nepr@energia.pr.gov
Website: <https://energia.pr.gov>
Business hours: Monday–Friday, 7:30 a.m.–4:00 p.m. (excluding holidays)

Independent Consumer Protection Office (OIPC)

Physical Address: 268 Ave. de la Constitución, San Juan, PR 00918
Mailing Address: 500 Ave. Roberto H. Todd, San Juan, PR 00907-3941
Telephone: (787) 523-6962
Fax: (787) 523-6961
Email: info@oipc.pr.gov
Website: <https://oipc.pr.gov>
Business hours: Monday–Friday, 8:30 a.m.–5:00 p.m.

Your account is set up on auto-pay. Payments will be automatically debited using the information you provided in the Palmetto App or payment portal. If your payment date falls on a weekend or holiday, it will process the next business day. Please be sure you have sufficient funds available.

Your LightReach Solar Overview

- **System Size:** 16.20 kW
- **Year 1 Estimated Production:** 23,904 kWh
- **kWh Rate:** 16.20 kW
- **Term:** 25 years

Billing + Support

- If payment isn't received, late fees may apply as outlined in your agreement.
- For billing questions: billing@golightreach.com
- For everything else: help@golightreach.com

Helpful Notes

- Bank transfers, checks, or ACH payments can take up to 5–7 business days.
- Credit card payments include a pass-through processing fee (this goes to the processor, not Palmetto).
- Need to update your contact info? Reach out and we'll get our records updated.

1.

BILLING AND COLLECTIONS POLICY

Version 4- May 2025

PURPOSE OF THE POLICY

Detail guidelines to support the successful billing, collection, delinquency, default and recovery process to support the customer base.

INTRODUCTION

A wide range of activities are needed to effectively and efficiently service consumer loans, including providing customer service to respond to customer requests, payment processing, telephone collections, record keeping, and advanced collections including legal action and bankruptcy. At the same time, a number of federal and state requirements apply to the servicing and collections of consumer accounts, providing direction to account servicers on issues such as late fees, calling times and collection efforts, and payment posting times.

Servicemembers Civil Relief Act: The Servicemembers Civil Relief Act of 2003 (“SCRA”) was signed into law on December 19, 2003, amending and replacing the Soldiers’ and Sailors’ Civil Relief Act of 1940, and is codified at 50 U.S.C. 3901 et seq. It was further amended December 10, 2004, by the Veterans Benefits Improvement Act of 2004. The law protects members of the Army, Navy, Air Force, Marine Corps and Coast Guard, including members of the National Guard, as they enter military service (active duty), as well as commissioned officers of the Public Health Service and the National Oceanic and Atmospheric Administration engaged in active service. The SCRA provides the benefit of interest rate adjustments and the prohibition of certain collection activities for active duty military.

Military Lending Act: The Military Lending Act (MLA), enacted in 2006 and implemented by the Department of Defense (DoD), protects active duty members of the military, their spouses, and their dependents from certain lending practices. These practices could pose risks for service members and their families, and could pose a threat to military readiness and affect service member retention.

The DoD regulation implementing the MLA contains limitations on and requirements for certain types of consumer credit extended to active duty service members and their spouses, children, and certain other dependents (“covered borrowers”). For covered transactions, the MLA and the implementing regulation limit the amount a creditor may charge, including interest, fees, and charges imposed for credit insurance, debt cancellation and suspension, and other credit-related ancillary products sold in connection with the transaction.

The Fair Debt Collections Practices Act- Under the Act, the term "debt collector" means any person who uses any instrumentality of interstate commerce or the mails in any business the principal purpose of which is the collection of any debts, or who regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another. The term

includes any creditor who, in the process of collecting his own debts, uses any name other than his own which would indicate that a third person is

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collecting or attempting to collect such debts. The term does not include any officer or employee of a creditor while, in the name of the creditor, collects debts for such creditor. The requirements of the FDCPA are designed to regulate third-party collection agencies, however, are generally accepted as best practice for collection efforts of parties collecting their own debt as well.

GOVERNANCE AND OVERSIGHT

Senior Management is responsible for oversight of Palmetto's compliance with these requirements. Senior Management will formally adopt this policy on at least an annual basis as part of Palmetto's Compliance Program.

POLICY STATEMENT

It is Palmetto's policy to comply with all applicable regulations covering our products and business practices. Specifically, Palmetto will comply with all applicable elements of regulations governing servicing and collections, including MLA/SCRA, the Fair Credit Reporting Act and elements of FDCPA.

Customer Account Setup

1. During the application process, Customers provide consent to obtain credit reports in writing or verbally. Audio recording of the verbal consent will be retained.
2. During the application process, Palmetto will establish a Palmetto account for the customer. This Palmetto account will be used by the customer throughout their contracting, installation, and solar production lifecycle to provide information, check project status, view billing information, and make payments.
3. During the account establishment process, the customer will complete Payment method and, where allowable by applicable law and regulations, automatic payment authorization
 - i. Where a state requires a consumer payment choice, Palmetto will provide payment options in addition to auto debit, including check payment. The decision made to extend financing to the customer is not based on the customer's decision to pay through automatic payments.
 - ii. All convenience fees associated with electronic payment are for the benefit the merchant acquirer and not Palmetto. This is largely attributable to credit card interchange fees.

Merchant Acquirer Partner

Palmetto utilizes 3rd party services to validate bank accounts, process customer payments, and deposit cash to a collections account. These services will handle the following:

1. Validation of customer provided bank account information. If the customer provides a bank not covered on the service's platform, Palmetto will validate via micropayment validation, voided check or bank letter submission, or other NACHA-compliant processes.
2. Daily automated collection runs of customer payments per the customer contract and billing authorizations.
3. Provide real-time data on payments, missed payments, or rejected debits to reconcile with contractual obligations. Reconciliation will be handled monthly with reporting out to the servicing and collections team.
 - a. The reconciliation of the customer activity file will be done on automated basis
 - a. Palmetto will reconcile the collection data with accounts receivable for open customer accounts. In event there is not a match, Palmetto will pass the un-applied accounts receivable to a suspense account and manually review for action.
4. Palmetto will review the suspense account weekly for any open AR, failed payment reports, and outstanding AR past due. These reports will be generated and submitted to AR, Service, and Finance/Treasury

Account Billing Process

1. Customers will be on constant payment terms as defined in their contracts, which will allow a timely process of billing and collection of customer monthly payment. These are typically as follows, but may vary and are defined in the customer contract:
 1. Monthly billing cycle period
 2. 20 day payment grace period before late fees apply.
2. Palmetto will generate a contractual payment schedule to the billing service once the project has reached the billing trigger defined in their contract. The billing service will use the contractual payment schedule to process daily debit and settlement of customer payments which is based on a set payment schedule based on billing terms. Bill statements (i.e., customer invoices) are automatically generated using the customer contractual payment schedule data from the billing service that ties to a particular payment period
3. Where a customer opts-out of automatic payments, the customer will have the ability to make one-time payments via the payment methods defined in their contract through the their Palmetto account or by calling the billing subservicer to make a payment via phone
4. Customers can log in to their Palmetto account to view any previously billed amounts, current amounts, and bill statements (i.e., current customer invoice).
5. Bill statements are typically made visible to customers on their account at least 30 days prior to a payment due date. Customers are notified that their statement is now ready to be reviewed according to their communications preferences as established in their contract or in the Palmetto account.

6. For automatic payment accounts, the bill statement will indicate that no additional customer action is required and will show the date upon which payment will be automatically processed. For non-auto debit accounts, the bill statement will highlight the due date of the payment as well as policies related to late payments.
7. In the case that a customer account requires a special or manually generated bill statement or invoice, designated financial operations staff will utilize the services manual invoicing capabilities to generate a bill statement and send it to the customer. The customer will have the ability to pay the bill statement leveraging any of the payment methods outlined in #4 above.

Tax Policy

Depending on customer location, the transaction may be subject to sales and use tax and property tax.

When applicable, sales tax will be levied on customers based on Palmetto's determination of sales tax applicability and calculated based on sales tax matrices in the billing service's platform. The billing service will update tax rates on a quarterly basis. The sales and use tax analysis will be refreshed each year and the sales tax calculator will be reconfigured as necessary. The company uses a free version of Avalara software to extract rates based on a third party provider's matrixed studies analyzing taxability and exemptions depending on the type of transactions involved.

Cash collected will be remitted to the appropriate authorities based on the accrual method. Remittances to jurisdictions occur on an accrual basis.

The company utilizes a third party for sales and use tax return processing (The third party is responsible for registrations, filings, and payments for sales and use tax with the appropriate jurisdictions, subject to review by either the Accounting Manager or the Tax Director at Palmetto.

The company uses a third party for property tax filing services. The third party is responsible for registrations and filings of property taxes with the appropriate jurisdictions. Payments are made by Palmetto, after a review by both the Tax Director and the third party. Remittances to jurisdictions occur on an accrual basis.

Customer and System Onboarding

1. A digital customer file is created in LightReach. LightReach is the source of truth for the customer origination process, fulfillment, and operations details. This includes all data regarding the system design, the customer approval process, payment activity associated with a customer account, and asset performance. LightReach will provide all the customer facing record information that will be viewed within the customer application.
2. Required financial details from the digital customer file are replicated in Palmetto's accounting platform, which is the system of record for accounting and audit. The file

within the accounting system will have details on status from the sale through fulfillment and operations including invoice, billing, etc.

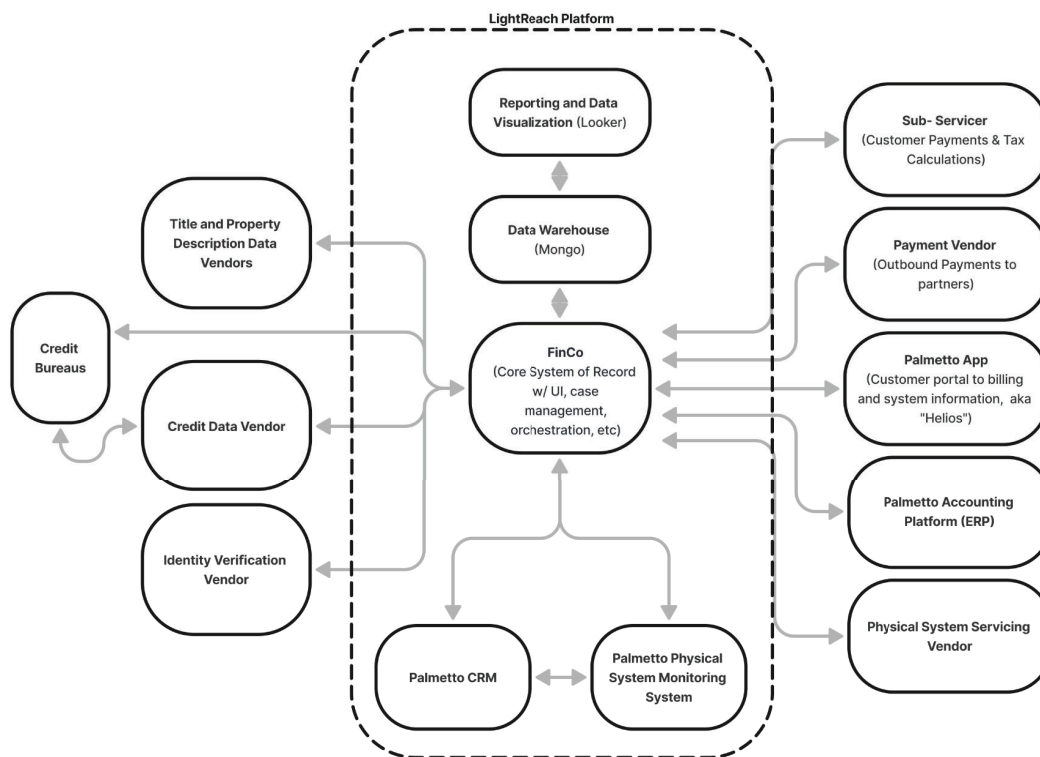
UCC Filing Overview & Process:

Prior to system activation, Palmetto will file a UCC fixture filing to provide notification of solar asset ownership. The process will be through:

1. Palmetto will use a 3rd party vendor to handle all UCC filing/Notice of Independent Solar Energy Producer Contract, monitoring, and record keeping
2. The vendor will file the UCC and NOIEPC forms upon installation of system
 - a. UCC filing date and lapse date will be recorded within LightReach
 - b. The vendor will be tracking the UCC filing, alongside the Palmetto, and will handle the extensions, with Palmetto monitoring to ensure completion. UCC filings will be extended every 5 years until the termination of the agreement.
 - c. . Palmetto policy and process associated with system removal and transfer are outlined in further sections

Reporting infrastructure below outlines the data flows and integration of systems internally. We have the ability to add and remove systems seamlessly through API integration endpoints.

System Map & Data Flow



Collections Policy:

Outbound Call Attempts

When talking to the borrower, Palmetto employees will emphasize to the borrowers the importance of making payments by their due dates. If the borrower is in a position to bring the account current, Palmetto will make arrangements to collect payment on a date that is certain.

Palmetto will adhere to the spirit of the FDCPA by following telephone best practices and not conduct any activities that are included in prohibited activities identified in the FDCPA.

Outbound calls will be made between 8am-9pm in the customer's local time on M-F. Outbound calls made on Saturday will adhere to 9am-3pm PST. Outbound calls will not be made on Sundays.

Collector Assignments

Calls are made to the telephone on record/file for customer or otherwise provided by customer. If a customer has indicated that he/she has engaged an attorney, Palmetto will make notes in file

and escalate to legal who will make determination whether continued correspondence will be completed through the customer or the customer's attorney.

Prohibited Activities

Palmetto's collections will never:

- Use or threaten to use violence to physically harm a person or his or her reputation or property;
- Use obscene or profane language or other language to abuse the customer;
- Cause a person's telephone to ring or engaging any person in telephone conversations repeatedly or continuously with intent to annoy, abuse, or harass; or
- Use any other false representation or deceptive means to collect information or attempt to collect any debt.

Communications with Borrowers

Palmetto believes in proactive and early intervention efforts to minimize delinquencies. Payment reminders will be sent to the borrower after the due date has passed if the borrower's payment has not been received.

Palmetto's collection policy is mirrored after current industry standards that provides the consumer the ability to make payment in a timely fashion, while Palmetto & its 3rd party service providers work through the collection process in the event of delinquency.

Upon a past due payment, Palmetto will follow the following collection policy:

1-30 days Delinquent	<ul style="list-style-type: none"> ● If auto-debit payment failure occurs, phone call and if needed and customer is enrolled in e-statements, email within 5 days of failure ● Customer contact via phone & email ● Palmetto service organization will a call to customer after 30 days ● Late fee is assessed at 30 days past due of \$25
31-60 days delinquent	<ul style="list-style-type: none"> ● Collections letter sent stating total past due and remind customer of contract obligations & potential remedies if payment not received ● @ 31 day email past due issued, with collection team following up with courtesy phone call ● Use skip tracing if contact info is no longer valid ● Post day 60, late fee assessed for missed payment of \$25.00 ● If customer is reached, discuss payment options to collect past due amounts
61- 120 days delinquent	<ul style="list-style-type: none"> ● @ 61 days DQ Customer contact via phone 2nd past due collection letter alerting customer of past due balance ● @90 days mail breach of contract notice sent to customer requesting payment and notifying of transfer to third party collection agency in 30 days

	<ul style="list-style-type: none"> • If customer is reached, discuss payment options to collect past due amounts
121-150 day delinquent	<ul style="list-style-type: none"> • @ 120 DQ begin the process of transferring outstanding collections to 3rd party servicer • Final outstanding amounts including late fees provided to 3rd party service party • Collection agency may report the the outstanding balance and debt to credit report bureau after non-payment for 60 days • Collection agency will follow its process to engage consumer based consumer privacy and collection policies • @120 days Palmetto records outstanding amounts as bad debt • Palmetto Collection team engages with collection agency with status updates on process of claim around outstanding balances providing internal reporting on bad debts on monthly basis

Late Payments & Fees

Late payments will be assessed at a rate consistent with market standards. Customers will be afforded a 20 day grace period before a late fee is assessed. Palmetto may allow the servicer to make up to two late fee waivers when requested from the borrower.

\$25 returned check fee (or lower amount as required by law) for any check or withdrawal right that is returned or refused by bank

A wide range of activities are needed to effectively and efficiently service consumer financial obligations, including providing customer service to respond to customer requests, payment processing, telephone collections, record keeping, and advanced collections including legal action and bankruptcy.

- Federal and state requirements apply to the servicing and collections of consumer accounts, providing direction to account servicers on issues such as late fees, calling times and collection efforts, and payment posting times
- Palmetto will comply with all applicable rules and regulations including the Fair Debt Collections Practices Act, the Military Lending Act, the Servicemembers Civil Relief Act, and the Fair Credit Reporting Act.

Inbound Call Coverage: Palmetto's subservicer will provide coverage to answer, address and escalate inbound calls for customer service and early stage collections outlined above in the policy.

Bankruptcy

If a customer contacts in writing admitting to insolvency, including evidence of bankruptcy filing, Palmetto Finance Operations or our sub-servicer will put their account in "bankruptcy" status in the billing system, which will prevent the customer from being contacted regarding their

past due balance, if applicable. Any amounts uncollected from a customer in bankruptcy status will be written off.

Our 3rd party servicer utilizes a monitoring service for updated bankruptcy status for customers.

Servicing & Collections

Palmetto will sub-contract with a 3rd party servicer managed and overseen by the Palmetto Finance Operations team that reports to Accounting within Palmetto. The 3rd party servicer to support delinquent collections will follow Palmetto's policies and procedures with regard to servicing and collecting on customer's financial obligations.

1. All collection & 3rd party servicers who engage in the collection on behalf of Palmetto for outstanding debts will follow Fair Debt Collections Policy Act to eliminate abusive, deceptive, and unfair debt collection practices.
 1. The policy places guardrails to ensure fair debt collection policies, in which Palmetto process to ensure appropriate compliance will ensure the following:
 1. For communications with a consumer or third party in connection with the collection of a debt, the term consumer is defined to include the borrower's spouse, parent, guardian, executor, or administrator
 2. only to the collection of debt incurred by the consumer primarily for personal, family, or household purposes, in this case residential solar, storage, or other Palmetto provided household services
 3. may only engage the consumer with collection of debt after 8 am and before 9 PM, local time

Transfer of Service Process

1. Intake of Request- Customers who are selling their home or requesting a system buyout initiate the process through a call, chat or email to Palmetto's customer experience team
 - a. CX follows a standard script to gather preliminary information and set expectations for the customer about the transfer process
 - b. CX creates a Transfer Case which is used to manage the customer experience through the transfer process
 - c. CX alerts the Finance Operations team of the customer's request
2. Transfer Process Begins
 - a. The Finance Operations team will schedule a call with the current customer where they explain the process and give more in depth information to the customer about transfer of service and buy out options.
3. Transfer to a new Customer
 - a. If the customer opts to transfer service to the new homeowner, the Finance Operations team will engage the prospective new customer, and qualify them for system ownership through the Sabal platform
 - i. If they do not qualify, Finance Operations will re-engage the homeowner and initiate the buyout process.

- b. Qualification standards for customers taking ownership of the system through transfer should match those of new originations, including credit approval, ID verification, ACH setup, and title change which may necessitate temporary suspension of the UCC filing.
 - c. The Finance Operations specialist will then prepare a transfer agreement amending the contract
 - d. Any outstanding account balances must be paid before or at the time of service transfer.
 - e. Upon execution of the transfer agreement, the account transfer is initiated in the billing system, and the helios system management platform.
 - f. Once account transfer is complete, the service transfer case is closed, the new customer will be placed in service, and a UCC-Financing statement is filed with the updated homeowner information.
4. Buyout
 - a. If the new homeowner is unable to qualify for transfer of service or the existing customer initiates the buyout process, the specialist will create a buyout quote and contract amendment and send it to the existing customer.
 - b. Upon account removal from service, the UCC filing is amended, and the service transfer case is closed.
5. Unsuccessful Buyout
 - a. If the customer is unable to transfer service to a new owner or complete a system buyout, the account would either remain in service with the customer continuing to make payments, or the customer enters into the collections process as described in the collections policy section.

Vendor Monitoring

Palmetto has set up weekly and monthly cadence between Palmetto Financial operations team and our vendor review weekly & monthly activity, data integrations & continuity, along with open items to ensure tight and consistent check & balances.

- Data Validation - We have ongoing monitoring of accounts that reached PTO + 30 days and do not have Concord billing started through our data reporting tool.
- Inbound Call Handling Audits - Monthly audits are completed by Palmetto, in which a selection of inbound Concord calls will be reviewed and feedback will be provided. Weekly calls with Concord Call Center to discuss issues and provide feedback of any identified issues.
- Outbound Collections Activities Audits - Monthly audits are completed by Palmetto, in which a selection of outbound Concord calls will be reviewed and feedback will be provided. Weekly calls with Concord Call Center to discuss issues and provide feedback of any identified issues.
- Late Stage Collections - All accounts that are eligible for late stage collections are approved by Palmetto before going into third party collections.

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- Email Monitoring - Palmetto will respond to Concord emails regarding customer inquiries within 2 business days.
 - Metrics - Concord will be measured primarily by our collections rate, but also by reviewing weekly call conversion and payment conversion rates. We track all open requests with Concord for improvements and reporting and discuss in bi-weekly meetings.

Complaint Management Policy

Version 1, February 2024

INTRODUCTION

The purpose of this Customer Complaint Policy (“Policy”) is to ensure customer complaints are handled promptly and consistently, and that potential issues are escalated, reviewed and addressed in a timely manner. Palmetto uses feedback from customers to ensure products, services, systems, and personnel are operating as intended and ensures corrective action is taken to resolve individual complaints as well, using the information to determine if there is a broader risk to the company through a systemic error or failure in policy.

This addresses regulatory and legal complaints as well as complaints about products or services offered by Palmetto.

For the purpose of this policy, legal and regulatory complaints are complaints in which any of the following apply:

1. A customer has filed a complaint through a federal or state regulatory agency or through any rating agency. These complaints may be received directly from the agency, such as the CFPB, the FTC, State regulators, Attorneys General, etc., or may be received from the customer with the agency copied on the communication.
2. A customer has retained or is threatening to retain an attorney in connection with a complaint against or dispute with the company.
3. A customer has raised questions or concerns that Palmetto’s products, services or practices may violate applicable laws, rules, or regulations imposed by any government agency or authority.
4. A customer has indicated that they have been discriminated against or misled on a material issue related to a product or service offered by Palmetto.

A customer may register a complaint about Palmetto to a variety of regulatory agencies. These agencies will submit a notification to Palmetto for a response. This type of correspondence shall be directed to and handled by Legal and the Customer Service teams. All legal and/or regulatory complaints require a written response.

If a customer files a complaint directly with Palmetto indicating they have been discriminated against, misled on material issues related to Palmetto’s products or services or that Palmetto’s practices may violate applicable laws, rules or regulations, the complaint must be directed to and handled by Legal. Additionally, if a customer claims they are a victim of possible fraud, identity theft, breach of information, financial loss or criminal activity, the complaint must be escalated to Legal.

If the customer has involved an attorney, employees of Palmetto may not discuss the situation with the customer’s attorney; rather, all communication must be handled through Palmetto’s in-house or external legal counsel. In some instances the customer’s attorney allows for direct communication with the customer. In such cases Palmetto may only contact such customers after written authorization from the customer’s attorney.

Product or Service complaints are complaints in which a customer has raised concerns about the quality, nature, cost or timeliness of delivery of Palmetto's products or services. These types of complaints are handled by Customer Service, or respective business area management if deemed necessary. If the complaint is able to be resolved over the phone, a written response is not required.

Inquiries are general questions related to Palmetto's products, services or processes and are not subject to the requirements of this policy. Employees are the first point of contact with the customer and are empowered and encouraged to resolve the inquiry in a timely manner. Inquiries such as those about product availability or questions related to specific attributes, even if communicated in a negative manner, are not required to be logged on the CRM.

GOVERNANCE AND OVERSIGHT

The board of directors delegates responsibility of monitoring and responding to complaints to Senior Management. In turn, Operations is responsible for oversight of Palmetto's compliance with the requirements of this policy.

Operations is responsible for oversight of the complaint management and response function as well for maintaining a central repository of complaints, responses and supporting documentation. Additional duties are identified throughout this policy document.

POLICY STATEMENT

It is Palmetto's policy to comply with all laws and regulations related to customer complaints and to fully investigate and ensure a timely and accurate response to all complaints received. Palmetto will conduct a root cause analysis on all complaints to determine the overall effectiveness of controls and ensure systemic issues are identified and resolved.

COMPLAINT PROCESS AND RESOLUTION

In order to effectively implement this policy, Palmetto has created the following Customer Complaint Procedures. These procedures provide detailed instruction in the following processes:

- Processing a complaint
 - Investigation of complaint
 - Written responses
 - Complaint tracking
 - Escalation of complaint
 - Monitoring of issue resolution

Processing a Complaint

When a Palmetto employee receives a complaint, whether it is of a legal and/or regulatory nature or a product/service complaint, the employee will complete the CRM with the following information:

- Complainant Name
- Date of complaint
- Detailed description of the complaint
- Resolution taken, if successfully resolved without escalation
- Monetary remediation, if applicable

Legal and/or regulatory complaints, defined above, should be escalated to Legal for processing. Product or service complaints may be resolved by the first point of contact with the customer and not require the same steps, listed below, as legal or regulatory complaints.

Investigating a Complaint

Depending on the type of complaint, an investigation will be performed by the appropriate Palmetto employee or department. The investigation should include, at a minimum, the following activities:

- Gather and review all documents relevant to the complaint.
- Interview any employees involved in the events surrounding the complaint.
- Document the results of the investigation of the complaint in a folder identified by the customer's name.
- Determine where additional time and/or information is required to investigate and formulate a response.
- Based upon the results of the investigation, determine what corrective action, if any, is required.
- Prepare a response to the customer and/or the agency submitting the complaint.

Written Responses

All legal or regulatory complaint responses must be in writing and sent to the customer and/or agency within seven days of receipt of the complaint.

Written responses may either be the final response detailing steps taken to resolve the issue or may be an acknowledgment setting a reasonable response time to investigate and resolve the complaint. At a minimum, all complaint responses will contain the following information:

- A statement that Palmetto has reviewed the complaint.
 - A description of the complaint made by the customer.
 - The desired resolution of the complainant.
 - A response to the complaint, which may result in remedial action or denial of the complaint, as follows:
 - If Palmetto takes remedial action as a result of the complaint, the written response must include a statement and description of the action taken.
 - If the response does not include remedial action, or is otherwise a denial of the complaint, the written response will include a statement that describes the reasons for the denial.

Tracking of Complaints

All complaints will be recorded on the CRM.

In addition to the information described above, the CRM also contains the following fields, to be completed by the employee or department responding to the complaint:

- Date of Palmetto Response
- Comments/Note
- Whether the complaint has been fully resolved

- Palmetto actions to correct any systematic error

Escalation of Complaints

In the event that the first point of contact of an employee is unable to resolve a product or service related complaint, the complaint should first be escalated to the appropriate business manager. Responses to escalated complaints will be in verbal and writing and sent to the customer expeditiously after receipt of the complaint. If the business manager needs assistance in investigating or preparing the response, Legal may be called on for assistance.

All legal and or regulatory based complaints must be escalated immediately to Legal.

Legal will periodically review the legal escalations worksheet to determine if complaints are being appropriately investigated and responded to within the timelines set forth in this policy.

Additional monitoring will be conducted on resolution for those items that are resolved without being escalated to Legal. Results of this monitoring will be communicated to Senior Management.

SOCIAL MEDIA COMPLAINTS

Palmetto utilizes software technology to proactively monitor social media sites for any unlogged complaint related to Palmetto's business practice or products or services. If Palmetto finds a complaint registered on social media, Palmetto may attempt to communicate directly with the complainant. If the complainant is not able to be reached or doesn't respond, no further action is required.

REPORTING

At least monthly, a report of escalated complaints and trend analysis will be prepared by Legal and communicated to Senior Management. This report will be used as a tool to assess the needs for additional training, amendments to audit scope and/or the need for new or revised procedures.

TRAINING

All employees who have exposure to or may encounter customer complaints in their line of business will receive training at onboarding and annually or as business processes around complaints are updated.

RECORD RETENTION

Palmetto will retain customer complaint records in its CRM.

CUSTOMER SUPPORT

Version 2 - February 2024

PURPOSE OF THE POLICY

This policy provides an overview and guidelines today to support customer engagement during installation and post install to ensure a quality consumer experience, while driving to address any asset issue quickly and efficiently. The focus items of the policy include:

1. Customer experience management from point of sale through the solar asset being deployed to in service.
2. Customer support over the lifetime of the asset
 - a. Contact center process and policy
2. Additional support functions for platform members
 - a. Sales Partner Support
 - a. Build Partner Support
2. Organizational overview

Client Experience through System Fulfillment

Clients supported directly by +50 FTE, with plans to hire in accordance with volume, maintaining a 100 project:1 Customer Lead Ratio. Additional support is provided through back of house teams managing specific solar tasks such as document processing, and engineering functions.

1. Overview and Introduction
 - a. Palmetto takes a long view on platform experience, and has been highly focused on client experience since company inception. Through a combination of skilled project managers, best in the space consumer technology, and planning for the full lifetime of the customer, we aim to provide a quick, high quality installation and thoughtful support for the customer and their asset once the asset is activated, and goes in service.
 - a. We believe that solar is a personal journey, and have taken steps through a combination of staffing and technology to provide a journey that is both curated and structured, designed to meet the customer where they want to engage.
 - a. We also understand that solar is complex, with numerous 3rd party vendors and approvals. Thus have anchored our customer experience in personalized support from the CX team, and a mobile application that provides project status and insights from point of sales through the lifetime of the customer relationship with Palmetto.
2. Engagement throughout fulfillment journey
 - a. Every Palmetto customer is assigned a Customer Lead, who acts as their point of contact and project manager from point of sale through system activation. The Customer Lead is responsible for both proactive engagement with the customer, as well as internal project management to help facilitate:
 - . Receipt of all required documentation
 - . Amendments to contractual terms and project scope

- . Internal and external project management to ensure prompt and high fidelity project execution
- a. Key Touchpoints throughout the fulfillment journey include
 - . Welcome Call: Introduction to Palmetto, clarification of project scope, and expectation setting.
 - . Final Design Review: Verification of project scope upon completion of professional engineering and prior to 3rd party approvals
 - . Completion of Install: Touchbase to confirm customer satisfaction upon completion of installation, and resolution of any remaining construction related customer requests.
 - . Activation: Customer walked through system activation and expectation setting for their inservice system. This includes a soft handoff to the CX team who owns customer engagement from activation to end of asset life.
 - . Proactive journey updates: Variable touchpoints throughout customer fulfillment journey, ensuring customer awareness of progress and re-engagement should additional customer approvals be required.
- a. Technology Enablement
 - . In addition to the curated support of the Palmetto Customer Lead, all Palmetto customers are equipped with the Palmetto Consumer Application which includes the following feature functionality:
 1. Point of Sale Enablement
 - a. The mobile application facilitates communication with Palmetto, as well as the ability for customers to provide palmetto information about the asset site, such as photos detailing site conditions, and metadata about the site, such as roof age, electrical information, and preferred aesthetics.
 - a. The consumer application also serves as a documentation portal and repository for customer documentation
 2. Journey Status Updates
 - a. Order Status- Within the application, the customer is able to track the status of their order, with detailed information about the current step of the process, visibility into completed steps, and a roadmap for remaining project steps
 - . Upon system activation, the tracker is replaced with a monitoring portal.
 - a. Proactive Communication- Customers are kept abreast of project milestone progression through a combination of automated email and sms notifications. They are able to engage with these communication channels and reach their customer lead and the Palmetto CX team through SMS and Email.
 - a. Communication Hub- Housed within the application is a communication portal, which gives customers one touch access to Palmetto's customer support teams through SMS, Phone, Email, and live Chat.

- a. Scope of Work- The application sends customers emails with links to a landing page which details project scope and design. This is updated should the scope and design change as a result of the fulfillment process or customer preference.
- 2. Insights and Engagement post activation
 - a. Upon activation, asset production and consumption is surfaced in the application. The customer is able to view this data over varying periods of time, and weather data is overlaid with general system performance.
 - a. System performance alerts are also displayed in the application, giving customers visibility into performance issues that Palmetto is working to resolve.
 - a. Customers also have the ability to connect their utility history within the application, providing them detailed insights about their home energy ecosystem. By importing electricity bill data, customers are able to see exactly how much power they consume from the grid compared to system production. This is limited to customers with a supported utility.
- 2. Process and policies
 - a. Introduction: Palmetto's clean energy operating platform is designed to maintain an accurate system source of truth and customer system of record from point of sale through the system life cycle. All changes to documentation and system design are systematized and version controlled.
 - a. Contract Modifications: Contract and Design modifications are handled through the clean energy platform "change request" feature, which routes amendments based on the details of the change in scope. Changes are categorized into the segments below, and all are entered, tracked and completed within the change request feature. There are thresholds and allowable variance prescribed by the business for each, which are meant to protect value to the customer while also allowing for operational flexibility and ease of execution on the customers behalf. Furthermore, all system specifications and changes to those specifications are organized within a "Local Requirement" framework, which ensures that all assets are adherent to local, state and federal requirements, and are fully compliant with all governing bodies.
 - . System Size Changes: Adjustments to the system resulting in an aggregate change in size of system wattage.
 - . System Production Changes: Adjustments to the system which result in a modeled change in year 1 production.
 - . Customer Account Changes: Customer record changes, including adding or removing a cosigner/borrower, or adjustment to customer contact information.
 - . System Price Changes: Changes in total price, which may include changes as a result of system size or expected production change, as well as

- changes due to the inclusion or removal of system adders such as electrical upgrades or other necessary or requested site improvements.
- . System Design Changes: Layout or system scope changes, which include amendments to panel layout or balance of system location, or like-for-like adjustments to system hardware such as inverter or panel.
- a. Document Generation
 - . Document generation and collection is managed with Palmetto's document portal. This includes documents required at the point of sale in order to fulfill the ordered system, as well as documentation required on an ad hoc basis.
 - . The document portal is version controlled, and while documents can be archived, system records are maintained throughout the lifetime of the project.
 - . Documentation is systematized, ensuring that in the event system details are amended as the result of a customer requested, or 3rd party mandated change, supporting documentation is changed to reflect accurate system details. This ensures that assets are permitted and interconnected with appropriate documentation.
 - . Palmetto reviews all received documentation to ensure that it meets local requirements and is compliant with local regulations.
- a. Updates to system of record
 - . Updates to the system of record are managed in two primary locations:
 1. Updates to Contract Terms are managed through the Change Request Engine as described above, and are fully systematized to ensure that changes are recorded and verified from an underwriting perspective.
 2. Customer contact information is managed in 3 ways
 - a. Contact information can be updated in the Contact, which acts as the system of record.
 - a. Changes to customer name or address, or the addition or removal of a cosigner is managed through Change Request Platform as described above.
 - a. Changes to system ownership, such as the transfer of property, are managed through the helios platform, which shifts ownership of the asset itself, post deployment to a new owner. These changes are managed through the property transfer policies described in the asset management section, but executed in the Helios Platform.
- a. Local Requirements
 - . Palmetto maintains a national database which captures the following compliance, code, policy and regulatory information in a version controlled, API enabled environment:
 1. State requirements
 2. AHJ Requirements
 3. Utility Requirements
 4. HOA Requirements

5. Financier Requirements
 6. Incentive Requirements
 7. National Requirements
- . This database and its interconnectivity to Palmetto's technology platform ensures that deployed systems are built within all recognized compliance frameworks, which derisks the fleet from future service interruptions as well as delays in deployment and time to inservice. The database also tracks license expiration, allowing Palmetto to proactively maintain all applicable licenses in good standing.
 - . Database maintenance is both active and passive, meaning that Palmetto's operational teams will update requirements in the normal course of their work, and proactively as they research new service areas, or complete audits of existing areas.

Customer Support over lifetime of asset

In-Service Customers are supported directly by ~34 CX team members. Additional customer support comes through escalation and engagement with the fintech and asset management organizations

1. Overview

- a. Inservice assets are supported by CX, Asset Management Teams, and the Financial Operations team, with CX acting as tier 1 support, and managing the majority of inbound customer inquiries. When required, the CX team will elevate inquiries to the Financial Operations or Asset Management teams to assist with specific contract or asset related needs. Customer support will always follow the basic escalation path of:
 - . First Point of customer engagement: Provide self service resources through the Palmetto Platform
 - . Second Point of customer engagement: Direct support through a Palmetto CX Team Member
 - . Third Point - CX Manager and escalation process followed based on case issue
- a. Examples of inquiry types supported by these groups includes:
 - . CX Team
 1. General billing or account related questions, production or asset performance remote troubleshooting, general solar and contractual questions and clarifications.
 2. CX will also own administration of the UCC-1 Filing alongside the portfolio management team
 - . Portfolio & Asset Management
 1. System transfer, relocation, removal or redeployment.
 2. Performance guarantee administration, ownership of asset fleet health.
 3. UCC filling monitoring
 - . Fin Ops

1. Contract amendments, forbearance, collections.
 - a. The CX team composition is hybridized, with a BPO under contract working as tier 1 support, and Tier 2 support composed of Palmetto employees. Alongside, Palmetto is expanding its service support offering by opening a centralized hub in Charlotte, NC which will house additional customer service & asset management members.
2. Engagement and Support Channels
 - a. In-service customers receive omnichannel support through 4 channels. They also have account and support channel access through the Palmetto Consumer Application.
 - a. Inquiry Volume
 - . Palmetto receives around 15,000 unique contacts per month
 - . This translates to a contact rate of around 1 contact for each in-service customer. This contact rate has been declining over recent periods as self service functionality is improved.
 - . Support Channels Include the following:
 - . Chat
 1. Chat is accessible for homeowners from the palmetto.com website, as well as within their consumer application.
 2. Hours of Support
 - a. 9-9 EST Monday-Friday
 - a. 10-5 EST Saturday
 - a. Closed Sunday
 2. Performance
 - a. Average Speed of Answer: 1m
 - a. Average Speed of Resolution: 12m
 - . Phone/SMS
 1. Customers can access the support phone number from the palmetto.com website and within the consumer application. They can also respond to SMS messages sent through our communications platform and engage in ad hoc SMS conversations with Palmetto.
 2. Hours of Support
 - a. 9am-9pm EST Monday-Friday
 - a. Closed Saturday and Sunday
 2. Performance
 - a. Average Speed of Answer: 1m
 - . Email
 1. Customers are able to respond to Palmetto automated emails, and can access support email from the palmetto.com website and within the consumer application. We are in the process of restructuring this team and plan to have email response time centered around 1 day within the quarter, as well as steer volume to more effective channels.
 2. Hours of Support
 - a. 9am-9pm EST Monday-Friday

- a. Closed Saturday and Sunday
 - 2. Performance
 - a. 4 Day First Response
 - a. 6 Day Resolution
 - . After Hours Support
 - 1. Palmetto leverages an answering service vendor to provide after hours escalation support. The service escalates urgent items to Palmetto operations teams to ensure rapid response for time sensitive issues.
- 2. Process and Policy
 - f. Customer Inquiry Process and Policy
 - . Customer inquiries, regardless of communication channel, are all logged within Palmetto's CRM. Inquiries are data tied allowing Palmetto CX leadership to understand inquiry type trends over time. In the event inquiries are escalated, they are tracked through a case system, ensuring customer continuity and issues resolution, regardless of the team who resolved the customer concern.
 - f. Asset Reassignment and Transfer Policy and Procedure
 - . Reassignment and Transfer Process
 - 1. Asset reassignment and transfer is managed by the Palmetto Portfolio & Asset management team. Upon request for an asset transfer due to the sale of a home or other transfer of ownership, the asset management team will open a corresponding case, and take steps to qualify the potential new property owner and property. The detailed policy is highlighted in Section 4 of this document.
 - a. The qualification process will mirror that of a new customer where we will be transferring to a brand new customer - qualifications for credit, suitability of home, and additional checks to ensure transfer is acceptable.
 - a. Where the transfer is associated with an existing customer, Palmetto will do a new assessment to ensure the home meets the contractual obligations that were outlined by Palmetto and home owner in the original customer agreement.
 - . Documentation and Systems
 - 1. The asset management team will originate new customers within Palmetto's Clean Energy Operating platform, and work with customers and representatives such as realtors or lenders to ensure underwriting and qualification is completed in accordance with the standards outlined in this document.
 - 2. Transfer of assets will be completed in both the Fintech Platform and the Helios Dashboard.
 - 3. The asset management team will not transfer/remove any customer contractual obligations until the new customer has been properly

qualified and signed a contract based on asset FMV- protecting the fidelity of the asset.

f. Account Security Policies

. Call Recording

1. Palmetto records all phone calls and preserves all electronic correspondence related to the customer account, in accordance with local and federal laws.
2. Recorded calls and preserved communications are used for quality assurance and team training, as well as review of conversations in the event of account discrepancies or misunderstandings.

. Customer Verification

1. Palmetto CX agents are trained to validate the caller relation to the account, as well as ensure PII information is not shared with inappropriate parties by using a 2 step verification process based on selected question and answer that match the security profile of the customer.

Additional Support Functions

1. Overview

- a. Palmetto supports a multi sided marketplace, and has established support mechanisms focused on partner success, which in turn ensures an educational and accurate sales process and a high quality and professional installation experience.
2. Sales Member Support is provided by 26 Palmetto employees, organized in the following areas:
 - a. Dedicated inbound resources that are focused on point of sale technical and training support for sales members primarily through chat housed within the sales platform
 - a. Proactive business development team support engaging with sales members to enable portfolio growth and expansion.
 - a. Pipeline management and support through an account services team, which focuses
 - a. Training team ongoing education and product training, with an in-application e-learning library. The training team also maintains a library of policy and process resources accessible to sales members through web application or within the Palmetto Chat Portal.
2. Build Partner Support is provided by 13 employees who assist build partners by providing:
 - a. Compliance and onboarding resources, including a regimented onboarding process, which ensures build partners are compliant with all local and national contractor laws, as well as with Palmetto's quality and insurance standards
 - a. Engagement training and support on a localized level. This includes performance management, as well as enablement resources supporting continuous improvement of build partner quality and capacity
 - a. Technical support or day of installation, and installation completion requirements. The technical support hotline is available by phone 5 days a week, and assists with on the fly design amendments, method of interconnection

changes, code interpretations, equipment changes, and all other ad hoc built partner requests.

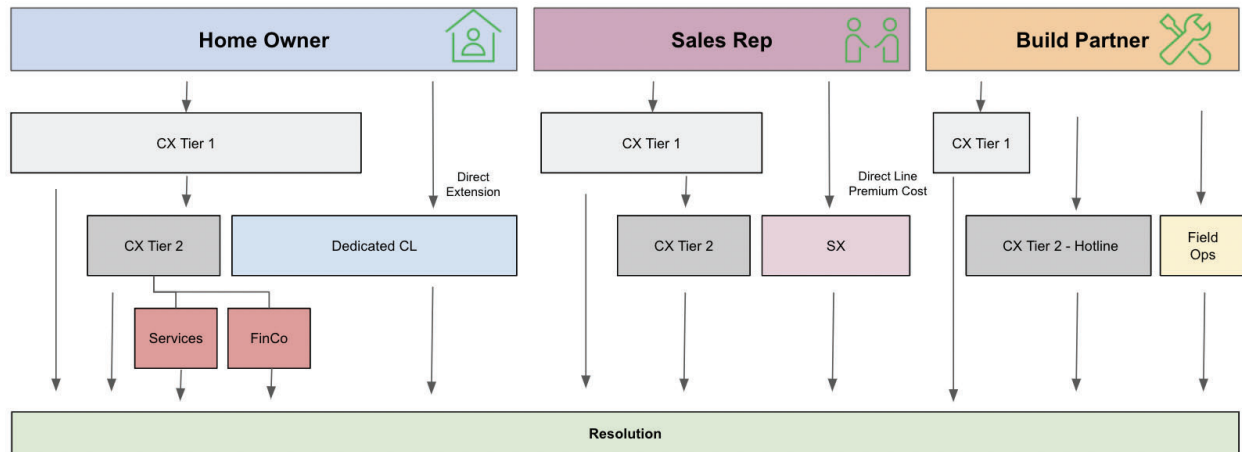
CX Organizational Structure



CX Workflows based on customer based

Palmetto has 3 sets of customer its focuses on to ensure quality customer support:

1. Home Owner, (2) Sales Rep (3) Build Partners
1. Coordinated inbound, standard Tier 1 team
2. Efficient routing and escalation paths
3. Dedicated POC per Customer
4. Training per team to ensure one touch resolution
5. Standard systems for managing phone, email, chat
6. Consistent success metrics & KPIs



CL Assigned at Booking

Guiding Principles. Best Price. Best Service.

Palmetto - Best Service means.

Phased approach + minimize business disruption

- Customer First mindset
- Palmetto to own Customer Relationship. Own our destiny + drive App Adoption.
- Single POC and pathway per Customer.
- Proactive. Prevent issues before they happen.
- Speed to resolution. When issues do arise, resolve them in one-touch.
- Standard escalation routing and severity definition across all functions.
- Emergency on call support + dedicated white glove escalation handling.
- Self serve. Ability for customers to self-solve issues and in-app support.
- Premium support. Service so good, ability to charge a premium.
- Drive efficiencies to reduce opex

Marketing, Advertising and Social Media Policy

INTRODUCTION

Marketing, advertising, solicitation and customer contact are each governed by a broad and complex range of federal, state and local laws, rules and regulations. The laws, rules and regulations create certain restrictions that cover all elements of a company's marketing program, from sourcing customers to the development of print, television, radio, telephone solicitation scripts, electronic media, including internet, email and text messages. Additionally, these rules provide a construct in which the company must provide clear and accurate information related to the products and services offered.

POLICY STATEMENT

Palmetto and its employees are committed to complying with all federal and state requirements in the areas of marketing, advertising, solicitation and customer contact. Palmetto will not prepare or use advertisements that are or could be interpreted as misleading, inaccurate or otherwise misrepresenting Palmetto's products or services, including terms and conditions.

Palmetto will ensure that all advertising, marketing, social media or customer communication and materials are truthful, non-deceptive, reasonable and fair, including all appropriate and required disclosure, and that all disclosures are clear, conspicuous, legible and reasonably understandable.

SUMMARY OF APPLICABLE REGULATIONS

The **Controlling the Assault of Non-Solicited Pornography and Marketing ("CAN-SPAM") Act** and the Federal Trade Commission ("FTC") **CAN-SPAM Rule** make it unlawful to send certain electronic messages that contain false or deceptive information and also provide protections for email users.

The **FTC Telemarketing Sales Rule** (16 C.F.R Part 310) and the **Federal Communications Commission ("FCC") Do-Not-Call Registry**. The Telemarketing Sales Rule states that "No person or entity shall initiate any telephone solicitation to a residential telephone subscriber who has registered his or her telephone number on the national do-not-call registry of persons who do not wish to receive telephone solicitations. Such do-not-call registrations must be honored

Palmetto Marketing, Advertising and Social Media Policy

indefinitely, or until the registration is canceled by the consumer or the telephone number is removed by the database administrator." The FCC maintains the national Do-Not-Call Registry.

The **Telephone Consumer Protection Act ("TCPA")** restricts the use of auto-dialers for advertising and solicitation as well as restricts contact to mobile telephone numbers.