



COMPLIANCE WITH DISCLOSURES PURSUANT TO SECURITIES LAW POLICY

Policy Number: 3.1008

Subject Area: Business Services and Finances

Adopted: 02/28/2022

Revised: 02/28/2022

The College is responsible for complying in all material respects with the federal securities laws. This policy and the accompanying procedures enable the College to create accurate disclosures with respect to a) Official Statements, b) Annual Financial Information, and c) Municipal Securities Rulemaking Board's ("MSRB") Electronic Municipal Market Access ("EMMA") notices. Collectively, the College refers to these as "Disclosures". The College is responsible for Disclosures prior to the issuance of bonds, notes, certificates, or other obligations and throughout the life of the obligations.

The Vice President of Administrative Services is designated as the officer responsible for the procedures related to Disclosures.

As part of the debt issuance process, the College disseminates documents identified as a) above. These will be referred to as Preliminary and Final Official Statements or Offering Circulars, including supplements or amendments. The reporting of certain information and events throughout the life of an obligation is described as continuing disclosure undertakings ("Undertakings"). These Undertakings include Annual Financial Information or Financial Information as defined in guidance for the Undertakings and are required under Rule 15c2-12 of the Securities Exchange Act of 1934, as amended, and the Securities and Exchange Commission's statements in enforcement actions. This policy and accompanying procedures also apply to notices of material or reportable events as defined in guidance, and other required or voluntary disclosures.

Approved 02/28/22