

Policy

COMPANY

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ESG Policy

INTRODUCTION

This Policy outlines the fundamentals of how Mr. Cooper Group (the Company) drives value by promoting strong Environmental, Social, and Governance tenets which strengthen communities and ensure Shareholders, Team Members, Borrowers, and generations to come benefit from the Company's long term approach to responsible operations.

SCOPE

The Company has adopted the Environmental, Social, and Governance Policy which outlines Mr. Cooper Groups dedication to ensuring compliance with regulatory requirements surrounding ESG issues.

STATEMENT

Environmental, Social, and Governance (ESG) Policy

Policy

The Environmental, Social and Governance Policy (the "Policy") outlines the foundational components for Mr. Cooper Group Inc. and its subsidiaries (collectively, "Mr. Cooper Group" or the "Company") and is the overarching parent policy over the ESG Program.

Mr. Cooper Group believes in keeping the dream of homeownership alive and creating a world where everyone can feel at home. The Company is committed to environmental sustainability, Diversity, Equity & Inclusion initiatives, and responsible business practices to create lasting results that will benefit its stakeholders (including Customers, Team Members, and partners) and the communities it does business in. Mr. Cooper Group strives to build environmental sustainability, social responsibility, and effective corporate governance in all aspects of its business.

Definitions

DEI — *Diversity, Equity, and Inclusion*

ELT — *Executive Leadership Team*

ESG — Environmental, social, and governance factors that a company reports on

GHG — Greenhouse Gas Emissions; Emissions including carbon, methane, and other gasses that contribute to global warming

Reporting — The act of disclosing company information to key stakeholders. If the company is publicly traded, this means disclosing this information publicly.

Objective

The objective of this Policy is to formalize the Company's commitment to several of the environmental policies and sustainable business practices that it has dedicated itself to over the years and represents an additional acknowledgment of its responsibility to contribute to creating a more resilient, equitable, and sustainable society. The Policy provides the Officers and Team Members of Mr. Cooper Group direction towards the management of an effective ESG framework.

Scope

The scope of this Policy is based on the Company's commitment to improving how its business decisions and policies address opportunities for sustainability. As the Company looks ahead to the future, it will remain transparent and focused on its ESG efforts.

Statement

Roles and Responsibilities

Board of Directors — The Board of Directors shall provide direction and oversight to ensure Mr. Cooper Group appropriately manages its ESG initiatives and framework. The Executive Leadership Team (ELT) will provide periodic reports to the Board of Directors regarding the implementation of the framework, regulatory reporting and disclosures, and performance to our established goals.

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ELT — The Executive Leadership Team shall be responsible for developing and implementing an effective ESG Framework commensurate with the Company's size and complexity. The Executive Leadership Team is also responsible for assigning members of their team with the appropriate subject matter expertise to the ESG Taskforce based on the reporting requirements and strategic priorities. At a minimum, the ELT will conduct a biennial review of all ESG-related policies, procedures and processes to determine the need for any significant revisions or additions.

ESG Taskforce — The Taskforce is a management working group comprised of key leaders from across the enterprise who meet on a regular cadence to assess the implementation of the ESG Framework by identifying, assessing, and monitoring opportunities and challenges pertaining to ESG.

The duties and responsibilities of the Taskforce include, but are not limited to:

1. Assisting the ELT in ensuring the compliance mandates established continue to be an integral part of the Company's ESG strategy.
2. Providing overall general guidance and expertise to ensure the successful implementation and ongoing support of the ESG Framework.

Executive and Senior Management — Executive and Senior Management are responsible for promoting a friendly ESG culture throughout the Company. This includes managing the resources and activities within the Company's operations that align with the ESG Framework and objectives.

Business Unit Management — Business Unit Management is responsible for implementing Mr. Cooper Group's ESG Policies, Standards, and Procedures in their respective business units.

ESG Framework

Mr. Cooper Group's ESG Framework provides a structured approach to managing ESG activities. The framework consists of the following three pillars:

Sustainable Environment

- Climate Risk Management
- Greenhouse Gas Emissions
- Consumption and Waste Reduction

Diverse and Inclusive Communities

- Diversity, Equity, Inclusion, and Belonging
- Community Engagement
- Social Impact

Sound and Strong Business Practices

- Board expertise and oversight
- Risk Management

Policy

- Reporting and Disclosures
- Privacy and Data Security

Sustainable Environment

Mr. Cooper Group is committed to integrating environmental stewardship in its operations, activities, and risk management processes. The Company is responsible for minimizing its operation's energy, carbon, water, and waste impacts and recognizing that these impacts occur not just in the operations of its portfolio but also throughout the entire value chain. As a result, Mr. Cooper Group strives to reduce the environmental effects across the full life cycle of its buildings and corporate operations.

The Company is committed to driving down its energy and carbon impacts, as it believes climate change is one of the greatest risks to our world and knows that buildings contribute significantly to global greenhouse gas (GHG) emissions. Mr. Cooper Group is committed to environmentally sustainable initiatives that deliver near-term efficiency, value, and health for its business, customers, and community.

Mr. Cooper Group also recognizes the impact the climate and environment can have on homeownership and is committed to educating homeowners on how to best navigate climate-related events.

Diverse and Inclusive Communities

Mr. Cooper Group believes diversity, equity, and inclusion is the foundation of a healthy culture. The Company is committed to fostering a workplace where every team member can flourish — and giving them the tools and resources to help their communities thrive.

Refer to the Diversity, Equity, and Inclusion Policy.

Strong and Sound Business Practices

Mr. Cooper Group views good governance as essential to creating and preserving value for our shareholders and other stakeholders. This includes a sound approach to corporate governance that complies with all applicable laws, rules, regulations, and policies and unwavering adherence to its values.

Good corporate governance supports the long-term interests of Mr. Cooper Group's many stakeholders and ensures that its ESG data is reliable and accurate. At Mr. Cooper Group, the Board of Directors provides strategic oversight of the ESG program and receives periodic reports from the ELT. Mr. Cooper Group has an effective and highly skilled Board of Directors with three committees: Audit and Risk, Compensation, and Nominating and Corporate Governance. The Company promotes Board independence and embraces Board diversity in all facets, including skills, experience, gender, ethnicity, and race. The ELT sets strategy and oversees the execution of Mr. Cooper Group's ESG initiatives and activities periodically provides the Board with relevant updates.

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Mr. Cooper Group's longstanding dedication to the preservation of fundamental rights and human dignity in our workplace and beyond is embedded in its daily operations and activities. The Company holds human rights to be an essential component of its business. Mr. Cooper Group supports internationally recognized human rights principles that promote and protect human rights.

Refer to Human Rights Policy.

ESG Risk Management

Integration of ESG in Enterprise Risk Management (material risk exposures, including climate and sustainability related and other ESG risks and related monitoring and mitigation strategies) is crucial to the success of the Company's ESG initiatives. ESG-related risks when and as directed by the Federal Housing Finance Agency and Federal Housing Authority shall be considered in the overall risk appetite program. Such considerations will ensure that the enterprise risk appetite is adjusted based on all threats (and is, therefore, a holistic reflection of the current risk posture) instead of just standard financial or business risks.

ESG Reporting and Disclosures

ESG reporting requires a comprehensive analysis of Mr. Cooper Group's performance in terms of identified ESG risks, opportunities, and other factors that may impact its Customers, Investors, stakeholders, and Team Members. The ESG report is a compilation of sustainability reports that demonstrate Mr. Cooper Group's ability to meet the requirements or achieve goals related to its ESG Framework. ESG reports shall cover internal and external disclosure of data covering business operations related to critical elements of the ESG Framework. The reports enable the measurement of success or progress in key corporate strategies and the impacts of corporate practices as it relates to ESG. The reports shall describe why data is measured, how it is measured, why it is disclosed, and how it is being disclosed. The following departments will be responsible for ensuring that required reports are produced timely:

- The Accounting Department shall be responsible for SEC-related reporting and disclosures in a timely manner.
- The Communications Department shall be responsible for publishing the ESG report biennially.

Internal Audit Program

This Policy and the ESG Framework are subject to review by the Company's Internal Audit program. Internal Audit operates independently of the business operations.

Policy Approval

This Policy will be reviewed and approved by the Board of Directors annually after the program has been fully implemented.