HealthEquity

Crisis Communication Plan

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Approved by:	Executive Sponsor
Business unit:	HealthEquity, Inc.
Owner:	Executive Sponsor
Executive sponsor:	CCO (Chief Customer Officer)

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1 PURPOSE AND SCOPE

The HealthEquity, Inc. ("Company") *Crisis Communications Plan* ("Plan") sets forth the Company's approach to organizing an enterprise communications response to an incident that disrupts business operations. This Plan applies to all Company affiliates and subsidiaries unless a separate plan or program is approved for the specific entity.

The goals of this Plan include:

- Avoid or minimize damage to the Company's profitability, reputation, and ability to operate.
- Define roles and responsibilities for the Crisis Communication Team when dealing with any event that can have an adverse impact on the Company, its partners, clients, members, executives, team members, and the general public.
- Provide a framework for how the Company responds to escalating incidents or crises requiring an organized and structured communications approach to engaging the Company and its key stakeholders.
- Prepare key personnel to communicate in the event of a crisis.
- Provide the procedures necessary to ensure in a timely manner, the right information is developed, approved and delivered at the right time to the right stakeholders.

1.1 Crisis Situations

The following situations are examples of events that apply to activation of this Plan.

- Data incident of the Company's systems, or that of a health plan partner, employer, third-party administrator, or vendor systems
- Company IT system or network failure
- Natural disaster and related impacts
- Team member violence/active shooter/bomb threat
- Resignation or firing of executive team member requiring legal disclosure
- Death of an executive team member
- Public litigation (lawsuit, embezzlement, corporate fraud, team member fraud, federal/state investigation)

1.2 Communication Coordination Overview

This Plan lays out the general procedure for coordinating communications materials, messaging, and personnel regardless of the severity of the incident the Company confronts.

This Plan will be used by the Company in response to any major incident of concern to the enterprise. The personnel and subject matter experts noted here have the same roles and responsibilities when responding to any incidents where the Company directs communications action occur. This Plan and its members can be expected to support any incident communications requirements that may arise regardless of which Company subsidiary impacted or how those

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incidents are rated on our P5-P1 incident severity scale. This Plan aligns to the Crisis Management Plan, the Major Incident Response process and the Cyber Incident Response Plan.

2 DEFINITIONS

When used in the context of this Plan, the following definitions apply:

Term	Definition
Crisis Management Team (CMT)	• The CMT consists of key business leaders (e.g., Product, Client Services, Member Services, Legal, People Team, Risk Management, Compliance, Operations and Security & Technology), and the appropriate business owners of critical functions, who are responsible for facilitating decision making, communication, response and recovery operations during a crisis. • Members of the CCT (defined below) are also members of the CMT. • The CMT will expand as necessary to include incident managers responsible for the specific incident and relevant business leadership. • The Crisis Leader relies on the Crisis Communications Team Lead to advise and lead the development and implementation of the Company's communication needs.
Crisis Communications Team (CCT)	• The team of diverse functional experts organized to support the development, management, and dissemination of communications, messages, and information to support the response and recovery of Company platforms, products, and services.
Crisis Communications Team Lead	• Leads the CCT as part of an Incident Response Team. Reports to the Incident Commander during incidents or Crisis Leader during a crisis. • Serves as part of the Service Recovery Team, and may utilize Service Recovery Project Managers to facilitate internal coordination based on severity levels. • Coordinates with the Business Resilience Program to execute requirements and planning.
Business Resilience Policy	• The policy that governs the creation, management, and training to the Crisis Communications Plan.
Business Resiliency Management Program	• Serves as the Company's Program Manager to direct, govern, and assure alignment across the incident management processes. • Includes the standards and processes used to manage Business Continuity, Crisis Management and Disaster Recovery.
Incident	• A negative event impacting the Company that an incident response team is tasked to address.
Incident Severity Scale	• The Company has aligned its incident severity scales around the P5 (low impact incident) to P1 (higher impact/severity) as well as a "Crisis" level to ensure alignment of all teams and resources should an incident commander declare the need for additional support.

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Authorized Spokesperson	• Only authorized personnel are approved to speak on the Company's behalf. All other employees are not authorized to communicate during an incident. • Authorized spokespersons who may speak on behalf of the Company are listed in Exhibit A of the Regulation FD Policy. • Additional designated spokesperson(s) can be added through coordination with the General Counsel.

3 RESPONSIBILITIES

The responsibilities of the teams and individuals primarily involved in implementing this Plan are listed below. Some CCT members also have other responsibilities during a crisis that they will execute concurrently with responsibilities noted here.

In the event of a crisis, the following CCT members should be engaged. Team members detailed below are responsible as subject matter experts in their functional fields, and if they are unable to perform their functions, are responsible for contacting their department and delegating their responsibilities to other team members.

CCT members can be reached at crisiscommunications@healthequity.com.

3.1 Team Lead

- Coordinate closely with Crisis Leader to ensure communications align with Enterprise intent and scale of incident.
- Ensure appropriate leaders or SMEs are identified and leveraged for incident communications development.
- Leverage pre-defined messages and communications templates when available for the scenario at hand.
- Clarify who speaks when and to whom; internally and externally.
- Determine appropriate communications protocol and cascade, and ensure timely delivery of communications within appropriate channels, to appropriate audiences in line with the service level agreements (SLAs) for the protocol.
- Stand up the appropriate communication channel owners to execute the communications protocol.
- Prepare emergency messaging in advance of incidents as part of ongoing program maturity.
- Ensure that the Company is the first and most trusted source for information related to any crisis event.

NOTE: The Team Leader will designate a backup during an incident to lead the CCT in the Team Leader's absence.

Name	Role	Mobile Phone	Email
Paul Kluding	Crisis Comm Team Leader	904-704-6061	pkluding@healthequity.com

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Bridger McGaw	Crisis Leader and Resiliency Program Director	202-422-7516	bmcgaw@healthequity.com

3.2 Communications Channel Owners

The CCT includes the Company's functional communications experts or communications channel owners. The use of these channels is illustrated through communications procedures managed by channel owners. Communications channels include:

Name	Role	Mobile Phone	Email
Sarah Hipp	Digital Marketing	801-727-6516	shipp@healthequity.com
Atiya Easterling	Public Relations	862-520-9408	aeasterling@healthequity.com
Lindsay Jump	Social Media	402-650-0065	ljump@healthequity.com
Jesse Liszka	Internal Comms	815-978-2965	Jliszka@healthequit.com
Megan Craig	Client Comms	214-783-6752	mcraig@healthequity.com
Alecia Gardner	Member Comms	801-558-8323	agardner@healthequity.com
Richard Putnam	Investor Relations	801-727-1209	rputnam@healthequity.com

- Digital Marketing: Manages marketing communications to external audiences, including email automation process for larger distributions. Also oversees Company website content.
- Public Relations: Coordinates with the external public relations team in development and execution of any communications shared with the media. They also can provide access to media training for any ad hoc spokespersons that may require it.
- Social Media: Monitors social media chatter on all channels. Responsible for posting content on behalf of the organization.
- Internal Communications: Develops messaging and identifies appropriate distribution channels for informing and engaging Company team members.
- Client/Partner/Broker Communications: Manages distribution of communications to external clients, partners and brokers as warranted. Also includes posting Salesforce alerts and creating Client Business Solutions (CBS) Alerts for client-facing teams.
- Member Communications: Provides Member Services teams with information to service Members, either online or through the call center. Includes creation of Scoop pages and other resources as needed.
- Investor Relations: Responsible for communicating to external investment community.

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3.3 Cross-functional Supporting Team Members

The following Functions will be represented within the CCT to ensure their expertise is available in the development or revision of messaging necessary to respond to the incident or crisis facing the Company. These leaders include:

Name	Role	Mobile Phone	Email
Matthew Fleming	Chief Risk & Compliance Officer	202-758-8708	mfleming@healthequity.com
Ryan McArton	Compliance	385-799-5936	rmcarton@healthequity.com
Thor Larson	Legal	801-360-4387	tlarson@healthequity.com
Melissa Householder	Information Security	480-599-0891	mhouseholder@healthequity.com
Abhi Gite	CIO	423-402-5817	agite@healthequity.com
Kate Grimaldi	People Team	630-220-0902	kgrimaldi@healthequity.com
Amanda Riley	Client Services	425-466-3648	ariley@healthequity.com
Kimberly Knott	Enterprise Service Delivery	214-491-9563	kknott@healthequity.com
Kevin Randall	Member Services	801-673-9320	krandall@healthequity.com
Ajit Gaddam	Security (Fraud)	954-798-1872	agaddam@healthequity.com
Kristi Gardner	Fraud	801-706-3186	kgardner@healthequity.com
Kamesh Tumsi	Product	678-799-6748	ktumsi@healthequity.com

3.4 External Public Relations Partner

The Company contracts with an external public relations firm to provide additional subject matter expertise to augment communications needs. They will provide recommendations and actions back to the core CCT. PR Partners include:

Partner	Name	Mobile Phone	Email
The Ricciardi Group	Mary Glasnapp	312-589-0952	mary.glasnapp@thericciardigroup.com
The Ricciardi Group	Marissa Arnold	612-309-9564	marissa.arnold@thericciardigroup.com
The Ricciardi Group	Meredith Rowley	703-403-2439	meredith@thericciardigroup.com

3.5 Final Communications Content Approvers

All communications and messaging provided by Company vendors, health plan partners, third-party administrators, or anyone speaking on behalf of the Company will be reviewed and

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approved by the CCT. Department leadership will be responsible for approving communications and representing their internal team members and external constituents in the review process.

No communications are authorized to be distributed without approval by these designated approvers.

Name	Role	Mobile Phone	Email
Mike Gathright	Chief Customer Officer*	214-693-0072	mgathright@healthequity.com
Melissa Phillips	Client Services	801-971-3564	mphillips@healthequity.com
Charles Mills	Operations	972-249-6090	cmills@healthequity.com

** Note that the Chief Customer Officer is available for any escalations if needed based on the incident we are responding to and its impact on clients, members, partners, and our reputation.*

4 PROCEDURE

This Plan will be executed in alignment with the Crisis Management Plan and other incident response plans designed for specific business impacting incidents (e.g., Information Technology, Security, Privacy, Natural Disasters, Third-Party Partners, Violent Intruders) to align messages and operations and promote consistent communications.

4.1 Notify Crisis Communications Team Members

The Crisis Communications Team Leader is a member of the CMT, which allows for immediate awareness of any incident that has escalated to the CMT. If a crisis is identified outside of an Incident Response Plan protocol, the Crisis Communications Team Leader will coordinate with the CMT and activate the Crisis Communications Plan. As necessary, the CMT will engage outside vendors/counsel. If applicable, the CCT will engage our Public Relations firm. For example, in coordination with our CMT, the PR team lead would notify our outside PR firm, the Security team could activate our security advisory partner, and the Legal team would notify our outside counsel, if needed. See the contact matrix in this document for the list of members and their contact information.

It is the responsibility of the Crisis Communications Team Leader to alert and engage members of the CCT if an incident warrants activation. Below is an established timeline for initial engagement efforts:

Role	Time to Initial Contact	Time to Escalate	Escalation Notes
Crisis Communications Team Leader	15 Min	15 Min	Try all communication methods before escalating to the backup. Preferred method to contact leader is directly to mobile phone.

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Crisis Communications Team Members	30 Min	30 Min	Try all communication methods to reach team members. Contact via mobile phone if email is not successful.
External Public Relations Team Leader	15 Min	15 Min	Try all communication methods before escalating to the backup.
External Public Relations Team Members	30 Min	30 Min	Try all communication methods to reach team members. Contact via mobile phone if email is not successful.

- Primary Method – Upon activation of the Crisis Communication Plan, the Crisis Communication Team Leader will send a meeting invite and activate the Company's virtual communication command center (as a remote teams meeting). This should be done in a timely manner and within minutes of learning of the incident.
- Teams Unavailable Contingency – If Microsoft Teams is not available, Everbridge ad hoc conferencing capabilities will be utilized. Our People Safety team can support setting up the capability. All inbound and outbound communications must be directed from the CCT, which will ensure consistent and clear messaging. Our Physical Security Director is responsible for Everbridge Communications platform setup, scheduling and works directly with Business Resiliency & CCT to finalize all communications before distribution to intended stakeholders.

4.2 Document Repository

Key communications materials are available for approved communicators to access and amend. Not all Company team members need access to these message repositories. If your role on the CMT or CCT necessitates access and use of these documents, then contact the Crisis Communications Team Lead to secure approval and access.

SPECIAL NOTE: No one is EVER authorized to use the word "breach" in any written documents or communications unless directed by the Legal Department.

4.3 Executing the Plan – Proactive Communications

The process to inform each audience should be carefully reviewed and may follow the recommended order below:

Action Item	Details
Identify Audiences	The CCT will identify all audiences requiring communication by completing the Crisis Communication Plan Checklist (Appendix A). • Audiences may include Company executives and board members, team members, health plan partners, brokers, employers, members, media, vendors, and the general public and/or others as deemed necessary by the CMT.

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Develop General Holding Statement	The CCT will develop a general holding statement based on initial crisis information available. • The holding statement will summarize the incident and provide any action items the Company is taking to address the incident and resources for support and direction on additional communications. • This statement will be used to craft consistent messaging to a variety of channels and audiences and will evolve as more information becomes available.
Verify Required Approvers and Review Cadence	The CCT and CMT will verify the list of reviewers for all communications based on the incident, as well as the appropriate timing of reviews. See Communications Approval Procedure in Appendix B.
Review and Revise Key Messages	Based on the holding statement and audiences identified, the CCT will create a comprehensive list of key messages for each audience. • The communication should include an overview of incident (from the holding statement), background for internal Company use only, external talking points, short messages for social channels, email templates for each department (executive team, partner services, employer services, and member services), message center copy, and corporate website copy, if applicable. • All communications should be tailored to fit the needs of the intended audience and approved by the agreed upon reviewers, as described above. When developing talking points for each audience, the CCT will anticipate answers to questions each group may be asked. • Immediate feedback from the team, along with feedback from any subject matter or incident experts, is critical in developing useful talking points for all potentially impacted groups. • Review the possible list of questions with the department and business leads to provide an inclusive list of communication resources and information.
Identify Communication Channels	Communication channels may include email, letters, phone calls, portal, corporate website, social channels, and the media. • Some audiences may be sufficiently addressed via Company messages to the media. However, the CMT and the CCT must identify the most appropriate time and method to communicate to each audience. • In all cases, communication to Company leaders and teammates should be attempted first before communicating news or information externally.
Determine Process to Inform Audiences	The process to inform each audience should be carefully reviewed and may follow the recommended order below: 1. *Company CMT and Incident Response Team briefing* – The CMT will coordinate with the incident manager to prepare an incident summary and provide it to the entire CMT and Incident Response Team. 2. *Company CMT to executive leadership briefing* – The CMT will leverage the incident summary to develop an appropriate executive team communication and send via email.

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	3. *Company spokesperson briefing* – The external PR team, with guidance from the Legal team, will provide a summary of the incident and talking points to the designated spokespersons directly. • Spokespersons will be trained to provide approved critical facts and responses to questions from external parties, while maintaining Company brand and consistent messaging. 4. *Company board members* – Any non-security related incident communication to the board will be sent to CMT, executive leadership, and chair of the audit and risk committee, who will vet the incident before communicating to the rest of the board. 5. *Health plan partners and third-party administrators* – In coordination with partner facing and Sales leadership, and contractual obligations, the Company will alert health plan partners prior to any notification of individual employers. • Notifications to health plans will be determined by the CCT depending on the incident. • Partner relationship managers (PRMs) will be responsible for fielding and responding to inquiries from their assigned partners. • Daily meetings will occur throughout the incident led by PRM leadership to maintain consistent messaging and provide updates. • NOTE: CCT will ensure that all team members who are assigned to manage relationships with health plan partners or third-party administrators are copied on all emails and included on any correspondence between the Company and partners/brokers. 6. *Brokers and consultants* – The Company will notify brokers and consultants after health plan partners have been communicated to and prior to communicating to employers. • Communications will be sent via methods outlined in the crisis communications checklist. 7. *Employers* – Employers will be notified of incidents after health plans and brokers. • All communications methods are outlined in the crisis communications checklist. • Account executives and service delivery managers will be responsible for responding and answering questions from employers. • Training for AE/SDMs will be provided in accordance with #2 above. • Account executives will be default contacts for groups who have one assigned, unless designated otherwise by the AE. • Employer services will be notified and provided with training to respond to inquiries from non-managed groups. • NOTE: CCT will ensure that all team members who are assigned to manage relationships with employers (AE/SDM/Sales) are notified of all communications between the Company and employer. 8. *Members* – Individual members will be informed of the incidents after all health plan partners, brokers, and employers are notified and prior to any media or public notification. • Communications will be approved and sent from the CCT.

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	• The list of members who will receive these communications will be compiled in coordination with the Incident Response Team. • All questions and inquires will be directed to Member Services or established hotline. Education alerts to members services will be drafted by Member Services leadership and approved by the CCT. • Talking points will be provided to the Member Services team to ensure consistent messaging is provided to members who contact the Company. • Client and member services review must occur BEFORE member communications. 9. *Media and General Public* – If required, the external PR partner will draft media notifications and communications to report incidents to the media and general public. • These communications will be reviewed and approved by the CCT. • The Director of Investor Relations will also be notified, and any additional investor-related communications will be drafted, if needed.

4.4 Media

If any media inquiries are received, please refer them to the public relations team at pr@healthequity.com. All critical communication should be through text or phone calls. If an email is sent, it should be followed up with a text or phone call to confirm receipt.

NOTE: If any incident or communication plan requires the Company to rely on an intermediary to direct the timing and method of communication, and/or the communication plan and timing proposed differs from the standard being followed by the Company and other covered entities/intermediaries, then the Chief Customer Officer will approve the deviation from the standard path. For any approved exceptions, these leaders will meet to determine if any information has changed that warrants different consideration.

4.5 Coordinating Communications

The Crisis Leader and Crisis Communications Team Leader will coordinate addressing the audiences listed previously. The CCT should only provide distribution of approved communications to ensure consistency.

Multiple layers of spokespersons could be put in place with consideration for a general corporate spokesperson (provides greater flexibility, cover, and ability to respond more strategically). We will leverage the most appropriate spokesperson at the right time. Putting a high-ranking executive in some situations can bring more attention and scrutiny, where using a general spokesperson demonstrates the Company cares but that it might not be important. Additionally, a general spokesperson is not expected to know all the inner workings of the Company or situation and can speak less specifically. We also need to consider that putting a general corporate spokesperson in charge of providing a detailed response to a serious incident or issue can demonstrate a lack of care or concern. This is where an executive spokesperson is key.

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Team members are subject to the Code of Business Conduct and Ethics, a Confidentiality Agreement, and the Social Media Policy. Any Company team member who discloses information not approved by the CCT may receive disciplinary action, including termination.

4.6 Initial Follow-up Actions

The Company will continue to monitor the situation with the following steps:

A. Continued Monitoring

By continuing to assess the situation and media reports, strategies can be updated, and incorrect information can be immediately addressed. All media reports including media coverage, social media, and any other platforms will be monitored with heightened scrutiny. Any incorrect information will be addressed immediately by the director of PR.

It is important to have an approach and criteria for social response. It can be counterproductive to respond to something that might not be correct but is only hitting a small audience. Often, response will amplify the situation and bring more attention. There must be discretion in when and where to respond on social media.

All messaging will be updated and redistributed to all internal teams immediately with a communication update by the CCT member who is responsible for their area of the business.

B. Continuous Follow-up Actions

The CCT members may outline processes to capture all follow-up items. Any communications drafted and provided externally must be reviewed by the CCT and/or the Legal team. Personal contact through a phone call, letter, thank you card, email, or onsite visit, can provide further opportunities to communicate the Company's key messages first-hand to its critical audiences.

5 PLAN REVIEW

The plan owner will review this Plan annually. Any changes to this Plan will be coordinated with the Business Resilience Program.

6 APPENDICES

Appendix A – Crisis Communication Plan Checklist
Appendix B – Communications Approval Procedure
Appendix C – Communication Principles & Key Concepts

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Appendix A

Crisis Communication Plan Checklist

Following is a checklist to support identification of all audiences requiring communication audiences will include Company executives and board members, team members, health plan partners, brokers, employers, members, media, vendors, and the general public. CCT members will be individually assigned to support the various listed stakeholders, definition of key messages, channels, etc.

Audience	Key Message	Channel	Date/Time	Audience Lead
Board				
Executives (XLT)				
Team members				
Partners				
Brokers				
Employers				
Members				
Media				
Operations Partners (Vendors/Suppliers)				
General Public				
Regulatory Authorities				

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Appendix B

Communications Approval Process

Once the CCT identifies and develops the appropriate communication tactics, the Crisis Communications Lead will work to gain approval based on the following criteria.

Severity Level	Communication Engagement Packages Complete
P5	8 business days
P4	6 business days
P3	4 business days
P2*	2 business days
P1 (CMT)*	1 business day

** Turnaround time for P1 and P2 incidents may be much quicker than 2 business days. Agreement upon turnaround time for reviewers to be determined as part of incident review and severity determination process.*

The communications will be initially reviewed and approved by the CCT members representing the following departments:

- Information Technology
- People Team
- Client/Partner/Broker Services
- Member Services
- Fraud
- Product
- Risk Management

Review turnaround times will be established by CMT incident for the above departments to allow for separate review standards that are set for Legal and Compliance as follows:

Severity Level	Communication Engagement Packages Complete
P5	2 business days
P4	2 business days
P3	1 business day
P2	Within 1 day
P1 (CMT)	Within hours

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Finally, before any communication is disseminated, the following will give final review and approval:

Name	Role	Mobile Phone	Email
Mike Gathright	Chief Customer Officer	214-693-0072	mgathright@healthequity.com
Melissa Phillips	Client Services	801-971-3564	mphillips@healthequity.com
Charles Mills	Operations	972-249-6090	cmills@healthequity.com

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Appendix C
Communication Principles & Key Concepts

Our communications protocols recognize that not all crises are the same, but all incidents may require some sort of special communications preparation and dissemination. When an incident is declared a crisis or has escalated to such a severity and scale so as to overwhelm an incident response team's efforts, and requiring enterprise response, this Plan will be used. When the CMT is activated or our CCT is engaged, our guiding principles help us meet our commitments:

- Be timely in our responses – both to team members and external stakeholders.
- Tailor messages to each intended audience.
- Meet deadlines that we set for ourselves.
- Update information regularly with the appropriate level of detail.
- Provide transparency.
- Share the facts.
- Speak with one consistent and clear voice.
- Communicate accurately about what we know.
- Do not speculate, it erodes trust.

We will use multiple communication channels to reach our audiences with accurate and timely information. The goal is to be open, accountable, and accessible to all audiences, while also being mindful of legal and privacy concerns.

The aim of this Plan is to ensure the right information is communicated at the right time by the right personnel, through approved channels, to the right stakeholders. The nature of the incident will determine the type of communication required, however a principle of "need to know" should be respected internally.

- Attorney Client Privilege – Establish business stance on the information we are providing to partners whether it pertains to the incident, information we are allowed to share with partners, regulations, or any other restrictions that may apply.
- Reporting Requirements – All communications are subject to different government reporting requirements based on the information disclosed and account type.
    - *GLBA.* The Gramm-Leach-Bliley Act (GLBA) applies to any company that is "significantly engaged" in financial activities. In its privacy provisions, GLBA addresses the handling of non-public personal information (NPI), which includes an individual's name and address, his/her interactions with financial institutions, and information related to his/her account(s). As a general rule, the Company is prohibited by the GLBA from sharing NPI with health plans and/or employers. In certain instances, the Company may be able to share NPI if authorized by the account holder or subject to a GLBA exception. Authorization of sharing NPI will be given by the legal and privacy teams only, and the exception must be documented prior to any NPI being shared.

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- *HIPAA.* The Health Insurance Portability and Accountability Act (HIPAA), governs the use of Protected Health Information (PHI). PHI is any individually identifiable health information transmitted in any form or medium that is held by an entity subject to HIPAA or its business associate and is created or received by a covered entity or employer; and relates to past, present, or future physical or mental condition or treatment, provision of healthcare, or payment for healthcare for that individual. Health reimbursement arrangements and limited purpose flexible spending accounts require us to process certain sensitive personal data including PHI. State and federal notification requirements may apply. The legal and privacy teams will identify the organizations requiring notification as outlined in the IRP section 3.6 and will provide the information required for disclosure to said entities.

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Approval Certificate

Docusign Envelope ID: A3345349-8BA3-49FE-8825-6171B644140C

Crisis Communication Plan

APPROVAL

Title	Name	Signature	Date
CCO (Chief Customer Officer)	Mike Gathright	Signed by: Mike Gathright	09/22/2025

REVIEWERS

Title	Name	Signature	Date
SVP, Client Service Experience	Melissa Phillips	Signed by: Melissa Phillips	09/09/2025
SVP, Operations	Charles Mills	Signed by: Charles Mills	09/12/2025
VP, Chief Risk Comp Officer	Matt Fleming	DocuSigned by: Matthew Fleming	09/19/2025
AVP, Business Optimization	Summer Kenney	Signed by: Summer Kenney	09/09/2025
AVP, Head of HQY Compliance	Ryan McArton	Signed by: Ryan McArton	09/10/2025
AVP, Digital Marketing	Leigh Scherer	DocuSigned by:	09/16/2025
AVP, People Partners	Kate Grimaldi	Signed by: Kate Grimaldi	09/09/2025
Dir, Business Resilience	Bridger McGaw	Signed by: Bridger McGaw	09/08/2025
Dir, Privacy	Justin Pingel	Signed by: Justin Pingel	09/09/2025
Sr Mgr, Service Recovery	Kristen Jones	Signed by: Kristen Jones	09/12/2025
Mgr, Enterprise Communications	Paul Kluding	Signed by: Paul Kluding	09/08/2025
AGC, Regulatory and Governance	Thor Larson	DocuSigned by: Thor Larson	09/09/2025

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APPROVED (as to form) GB TL US FS