RESOLUTION NO. 26-07

A RESOLUTION OF THE EAST LOOP COMMUNITY IMPROVEMENT DISTRICT REPEALING RESOLUTION NO. 18-003; APPROVING A COMPLIANCE REPORTING POLICY; AND AUTHORIZING CERTAIN ACTIONS IN CONNECTION THEREWITH

WHEREAS, pursuant to the Community Improvement District Act, Sections 67.1401 to 67.1571 of the Revised Statutes of Missouri, as amended (the ***"CID Act"***), the East Loop Community Improvement District (the ***"District"***) was formed on June 30, 2016, by Ordinance No. 70322 (the ***"Ordinance"***) passed by the Board of Aldermen of the City of St. Louis, Missouri; and

WHEREAS, pursuant to the Ordinance, the District was established for the purpose of undertaking certain public improvements and providing various services within the boundaries of the District through the imposition of, among other things, a special assessment pursuant to Section 67.1521 of the CID Act; and

WHEREAS, on August 16, 2018, the Board of Directors of the District adopted Resolution No. 18-003, approving a compliance reporting policy; and

WHEREAS, the District desires to repeal Resolution No. 18-003 in its entirety and approve a new compliance reporting policy.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE EAST LOOP COMMUNITY IMPROVEMENT DISTRICT, AS FOLLOWS:

Section 1. Repeal of Resolution No. 18-003. Resolution No. 18-003 is hereby repealed in its entirety.

Section 2. Approval of Compliance Reporting Policy. The Board of Directors of the District hereby approves the Compliance Reporting Policy set forth as **Exhibit A**, attached hereto and incorporated herein by reference.

Section 3. District Officers to Execute Resolution. The Chair or Vice Chair of the Board of Directors of the District is hereby authorized and directed to execute this Resolution for and on behalf of and as the act and deed of the District and the Secretary or Assistant Secretary of the Board of Directors of the District is hereby authorized and directed to attest to this Resolution.

Section 4. Further Authority. All actions heretofore taken by the authorized representatives, agents and employees of the District in connection with the transactions contemplated by this Resolution are hereby ratified and confirmed, and the District shall, and the representatives, agents and employees of the District are hereby authorized and directed to, take such further action and execute and deliver such other documents and instruments as may be necessary or desirable to carry out and comply with the intent of this Resolution.

Section 5. Severability. The sections, paragraphs, sentences, clauses and phrases of this Resolution shall be severable. If any such section, paragraph, sentence, clause or phrase of this Resolution is found by a court of competent jurisdiction to be invalid, the remaining portions of this Resolution are valid, unless the court finds the valid portions of this Resolution are so essential to and inseparably

connected with and dependent upon the void portion that it cannot be presumed that the District has enacted the valid portions without the void one, or unless the court finds that the valid portions, standing alone, are incomplete and are incapable of being executed in accordance with the legislative intent.

Section 6. Governing Law. This Resolution shall be governed exclusively by and construed in accordance with the applicable laws of the State of Missouri.

Section 7. Effective Date. This Resolution shall take effect and be in full force upon its passage by the District's Board of Directors and shall remain in effect until amended or repealed by the District's Board of Directors.

Passed this 27th day of October, 2026.

I, the undersigned, Chair of the East Loop Community Improvement District, hereby certify that the foregoing Resolution was duly adopted by the Board of Directors of the District at a meeting held, after proper notice, on October 27, 2026.

East Loop Community Improvement District
STATE OF MISSOURI

EAST LOOP COMMUNITY IMPROVEMENT DISTRICT

Chair, Board of Directors

WITNESS my hand and official seal this 27th day of October, 2026.

ATTEST:

Secretary, Board of Directors

EXHIBIT A

COMPLIANCE REPORTING POLICY

(Attached hereto.)

COMPLIANCE REPORTING POLICY

The purpose of this policy is to establish a method of reporting within the East Loop Community Improvement District (the ***"District"***) in order to minimize the risk of internal and external fraud as well as the theft of District assets or fraudulent financial reporting.

Reporting Suspicious Activities and Response to Report

Employees and others have an obligation to report criminal conduct and/or suspicious activity without fear of retaliation or reprisal. Reports may be presented to the Executive Director or any member of the Executive Committee of the Board of Directors (i.e., the Chair, Vice Chair, Secretary or Treasurer), each of whom is hereinafter referred to as the Compliance Officer (CO), in person, or individuals may file a written report. Employees can anonymously file complaints or concerns or report suspicious activities in a written report placed in the CO's in-box. The confidentiality of employees or others who submit reports of wrongdoing or suspected wrongdoing will be protected. However, employees and others must clearly understand that they have no absolute guarantees regarding confidentiality once the investigative report is turned over to appropriate law enforcement agencies.

Reports to the District must contain: the date on which the criminal conduct and/or suspicious activity occurred if known, a description of the activity and the name(s) of anyone involved in the activity. The District will receive and document reports, and will document their disposition. All reports of criminal conduct and/or suspicious activity received by the CO will be date-stamped upon arrival. The CO will review and investigate the complaint within 30 days from receipt of the complaint. If greater time is necessary to review and investigate the complaint, the CO shall make note of the reasons for the delay.

After an offense has been detected, the District will take reasonable steps to respond appropriately to the offense and to prevent further similar offenses, including any necessary modifications to policies or procedures to prevent and detect violations of law.

Employees will be held responsible and accountable for their knowingly failing to report suspected offenses or circumstances pertaining to this policy.

When reporting criminal conduct, it should be understood that the District does not tolerate any wrongdoing or fraudulent misconduct of any magnitude. Therefore, employees and others are encouraged to report conduct or suspicious activity regardless of the dollar amount.

No Reprisal by the District for Reporting Suspicious Activities

It is the policy of the District that no employee shall be subject to recrimination or any other form of punishment on the basis that they reported what was reasonably believed to be an act of wrongdoing or a violation of policies or procedures of the District. However, an employee will be subject to disciplinary action if the District reasonably concludes that the report of wrongdoing was knowingly fabricated by the employee or was knowingly distorted, exaggerated or minimized to either injure someone else or to protect the reporting party or others. An employee whose report of misconduct contains admissions of personal wrongdoing will not, however, be guaranteed protection from disciplinary action. The weight to be given the self-confession will depend on all the facts known to the District at the time it makes its disciplinary decisions. In determining what, if any, disciplinary action may be taken against an employee, the District will take into account an employees own admission of wrongdoing; provided, however, that the reporting employee's conduct was not previously known to the District or its discovery was not imminent and that the admission was complete and truthful.