

## **CHIMERA INVESTMENT CORPORATION**

### **WHISTLEBLOWER POLICY STATEMENT**

Chimera Investment Corporation (the "Company") is committed to fair, accurate and transparent accounting of its financial matters and expects all employees of the Company and its subsidiaries to act in accordance with the highest ethical standards in the performance of their duties and obligations. The Company also requires full compliance with its Code of Business Conduct and Ethics (the "Code") and its other policies and procedures, and with all applicable laws and regulations, and prohibits violations of applicable laws relating to fraud.

To facilitate the reporting of suspected Violations (as defined below), the Board of Directors of the Company adopted the procedures set forth in this Whistleblower Policy. This Whistleblower Policy is designed to establish policies and procedures for submission of suspected Violations, receipt, retention and treatment of such potential Violations, and the protection of individuals reporting suspected Violations from retaliatory actions.

#### **REPORTING PERSONS PROTECTED**

This policy and the related procedures offer protection from retaliation to individuals (whether employees or outside parties such as vendors, dealers and shareholders) who make any complaint with respect to, or that could give rise to, Violations (such individuals, a "Reporting Person"), provided the complaint is made:

- in good faith;
- in the reasonable belief of the Reporting Person that the conduct or matter covered by the complaint could give rise to a Violation; and
- pursuant to the procedures outlined below.

"Good faith" means that the Reporting Person has a reasonably held belief that the complaint made is true and has not been made either for personal gain or for any ulterior motive.

The protection against retaliation extends beyond the individual who makes the complaint to include anyone who participates in any investigation regarding a violation of applicable law (including laws related to fraud) or the Company's policies with respect to legal and regulatory compliance. The Company prohibits retaliation or the threat of retaliation. Anyone who engages in retaliation or who threatens retaliation against any individual who lodges a complaint or assists with the investigation of a Complaint will be subject to discipline, up to and including termination.

## **SCOPE OF COMPLAINTS**

Everyone at the Company has an obligation to report, in accordance with this Whistleblower Policy, (a) questionable or improper accounting or auditing matters, (b) violations and suspected violations of the Code, and (c) violations of or misconduct with respect to applicable laws and regulations (collectively with (a) and (b), referred to as "Violations"), including, but not limited to:

- illegal or fraudulent activity, including, without limitation, violations of any rule of the Securities and Exchange Commission ("SEC") or the Company's regulators (including State and Federal regulatory and licensing authorities), applicable laws related to fraud or any other laws, rules or regulations to which the Company is subject;
- violations of Company policies or procedures or statutory, regulatory or other requirements for good corporate governance;
- improper or questionable accounting, violations of internal accounting controls or improper auditing matters, including fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- misrepresentations or false statements to or by an officer of the Company or an accountant, consultant or regulatory authority regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- conflicts of interest, dishonest or unethical conduct, or inaccurate disclosures in the Company's SEC reports, regulatory filings and other disclosures;
- any other matter, that in the good faith belief of any employee or director reporting such matter, constitutes illegal or unethical behavior that could cause harm to the business, reputation or public position of the Company;
- any attempt to conceal a potential violation of any law, regulation or Company policy or procedure, or evidence of a potential violation; or
- any retaliation, in any form, resulting from the submission of a suspected violation.

## **CONFIDENTIALITY OF COMPLAINT**

The Company will keep the identity of any Reporting Person confidential to the extent consistent with a fair and thorough investigation, unless such disclosure is required by law, such as where a governmental entity initiates an investigation of allegations contained in the complaint.

## **SUBMITTING COMPLAINTS**

Any person who has complaints or concerns about the Company's compliance with laws and regulations, accounting, internal accounting controls, or auditing matters, or who becomes aware of questionable activities regarding compliance with laws and regulations, accounting or auditing matters, who becomes aware of any violations by any person of applicable law or the Company's policies is strongly encouraged to report such matters to the Company's Audit Committee. Reporting Persons will not be subject to retaliation for failure to report, but the Company is relying on all its employees to assist with maintaining legal compliance and adherence to the Company's policies.

Reporting Persons should submit complaints concerning Violations through the Company's "hotline", which is managed and staffed by an outside company, NAVEX Global, Inc.:

- **Toll-Free Telephone: 1-844-864-9715**
- **Website:**  
**<https://secure.ethicspoint.com/domain/media/en/gui/54148/index.html>**
- Reporting Persons who are employees of the Company or its subsidiaries may report Violations on an anonymous basis.
- Reporting Persons who are not employees of the Company or its subsidiaries are required to disclose their identity in any complaints submitted under this policy.

## **INVESTIGATION OF COMPLAINTS**

Upon receipt of a complaint, the Chairperson of the Audit Committee, will launch an investigation. Investigations will be conducted as quickly as possible, considering the nature and complexity of the complaint and the issues raised therein. Any complaints that are received that pertain to subjects outside of the responsibility of the Audit Committee will be forwarded to the Company's Chief Legal Officer for review and possible investigation, depending upon the nature of the complaint. The Chairperson of the Audit Committee may enlist employees of the Company and outside legal, accounting and other advisors, as appropriate, to investigate a complaint.

Following each investigation, prompt and appropriate remedial action will be taken as warranted in the judgment of the Audit Committee. Any actions taken in response to a complaint and conclusions made with regards to a complaint will be timely reported to the Reporting Person, unless such Reporting Person submitted the complaint on an anonymous basis. Because personnel actions are confidential, disciplinary action that

result from the investigation will not be shared with the Reporting Person. The Reporting Person will be fully appraised of whether the investigation revealed legal and/or policy violations and what steps the Company has taken to remedy such non-compliance and mitigate the risk of similar future issues.

A Reporting Person who is not satisfied with the outcome of the initial investigation or the remedial action taken with respect thereto, if any, may submit their written complaint, together with a written explanation of why the investigation or remedial action was inadequate (a "Revised Complaint"), to the Chairperson of the Audit Committee requesting him or her to forward the Revised Complaint directly to the Audit Committee for its review. The Reporting Person should forward the Revised Complaint consistent with the reporting procedure described above.

The Audit Committee will review the Revised Complaint, together with documentation of the initial investigation, and determine if the Revised Complaint merits further investigation. To the extent it deems necessary, the Audit Committee will conduct a subsequent investigation and engage in the same follow up described above.

### **RETENTION OF COMPLAINTS**

The Chairperson of the Audit Committee, or his or her designated representative, will maintain all complaints, tracking their receipt, investigation and resolution. All complaints and reports will be maintained confidentially in accordance with the Company's document retention policy.

### **UNSUBSTANTIATED ALLEGATIONS**

If, after an investigation, a complaint is found to be unsubstantiated and made for malicious or frivolous reasons or otherwise submitted in bad faith, the Reporting Person making the complaint could be subject to disciplinary action.

## **Reporting to Government Agencies**

Nothing in this Whistleblower Policy or the Company's confidentiality obligations prohibits you from reporting possible violations of any law or regulation to any governmental agency or entity, including to the U.S. Department of Justice, the Securities and Exchange Commission, the Congress, and any agency Inspector General, or making other reports under the whistleblower provisions of any law or regulation. You do not need the prior authorization of the Company to make any such reports and you are not required to notify the Company that you have made such reports. Your protection against retaliation extends to complaints lodged

externally as well as internally. *Please also note, that pursuant to the Federal Defend Trade Secrets Act Notice (see below), employees may disclose company confidential and trade secret information to government officials if such disclosure is for the sole purpose of reporting or investigating a suspected violation of law.*

## **Federal Defend Trade Secrets Act Notice**

18U.S.C. § 1833(b) states: "An individual shall not be held criminally or civilly liable under any Federal or State trade secret law for the disclosure of a trade secret that—(A) is made—(i) in confidence to a Federal, State, or local government official, either directly or indirectly, or to an attorney, and (ii) solely for the purpose of reporting or investigating a suspected violation of law; or (B) is made in a complaint or other document filed in a lawsuit or other proceeding, if such filing is made under seal. An individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the trade secret to an attorney of the individual and use the trade secret information in the court proceeding, if the individual—(A) files any document containing the trade secret under seal; and (B) does not disclose the trade secret, except pursuant to court order."

**Adopted: May 30, 2019**