



POLICY NAME: Clean Desk Policy	Business Unit: Records Management (ERM)
PAGE: 1 of 6	REPLACES POLICY DATED: November 21, 2023
EFFECTIVE DATE: June 14, 2024	REFERENCE NUMBER: RM.02
POLICY OWNER: Jeffrey De Marco, AVP Counterparty Risk and Records Management	
APPROVED BY: ECOC Voting Members	

Purpose

The purpose of this Clean Desk Policy is to establish the minimum requirements for maintaining a Clean Desk at Radian Group, Inc. (herein referred to as “Radian”). The intent of this policy is to ensure that Confidential Records that exist in any area utilized by Radian Personnel to conduct business activities are secured. A Clean Desk Policy is a key part of standard records governance controls.

Scope

This policy applies to all Radian Personnel of Radian Group Inc., its affiliates, and subsidiaries (“Company”) and anywhere Radian business activities are conducted.

Roles and Responsibilities

The party responsible for the content of this document is the Records Management Team within Enterprise Risk Management (ERM).

Governance and Oversight

Records Management Team

The Records Management Team has various responsibilities, including:

- (1) owning and updating the Clean Desk Policy, including obtaining input from Radian Legal;
- (2) providing overall direction for the Clean Desk Standards;
- (3) managing the development, implementation, and ongoing maintenance of materials and tools to support compliance with the Clean Desk Policy;
- (4) monitoring and reporting on compliance with the Clean Desk Policy;
- (5) educating Radian Personnel on their responsibilities related to Confidential Records in their Workspace; and

Radian Group Inc.

- (6) serving as a programmatic interface to Business Unit Compliance Leads, Records Management Liaisons, executive management, the Enterprise Compliance Office, Legal and Internal Audit.

Enterprise Compliance Oversight Council (ECOC) Voting Members

The ECOC Voting Members provide oversight of the Clean Desk Policy, including approving the Clean Desk Policy and reviewing and consulting on Clean Desk related Compliance issues.

All Radian Personnel

The Clean Desk Policy is referenced in the Code of Conduct and Ethics (Code), which is acknowledged by all Radian Personnel annually; therefore, a violation of this policy may be considered a violation of the Code.

Radian Personnel has the responsibility to:

- (1) be familiar with and, where appropriate, understand, Radian's Clean Desk requirements and consult Radian's Clean Desk Policy and Clean Desk Standards;
- (2) comply with the requirements in the Policy as they relate to Confidential Records they create, use, and manage;
- (3) maintain their Workspaces in compliance with this Policy;
- (4) retain, store, and dispose of all Confidential Records in accordance with the Records Management Policy;
- (5) submit requests to the Records Management Team for guidance, and
- (6) at times, if appointed by Records Management or a manager, conduct a Workspace inspection according to the Clean Desk Standards.

Business Unit Compliance Leads

Business Unit Compliance Leads will support and promote Clean Desk compliance in their respective areas. They will also report compliance issues to the Enterprise Compliance Office (ECO) and assist in resolving Clean Desk related concerns or compliance issues raised.

People Business Partners

People Business Partners will partner with People Leaders and Legal to guide them on providing feedback to and taking actions to address non-compliance with this Policy, up to and including disciplinary actions.

Key Terms – *See Appendix*

Policy

Radian Personnel are responsible for maintaining a Clean Desk when not physically occupying a Workspace and for the security of Confidential Records in their possession. This includes but is not limited to the following provisions:

1. Confidential Records shall not be left unattended when not in use.
2. Confidential Records shall be secured in a closed desk drawer, filing cabinet, or otherwise secured behind a closed door when not in use.
3. All Workspaces, excluding secured rooms, shall be cleared of Confidential Records before the end of the workday.
4. Confidential Records shall be removed from all shared spaces, such as conference or meeting rooms, at the immediate conclusion of a meeting.
5. Confidential Information on a whiteboard shall be thoroughly erased or concealed when left unattended; provided, however that a secured room where the whiteboard is not visible from a public area will not be considered unattended.
6. Electronic device screens shall be locked by employees when left unattended such that no other person may access or read Information from the device.
7. Computers/workstations used by Radian Personnel that contain Confidential Information shall be protected with the password enabled when left unattended.
8. Passwords are not permitted to be accessible to anyone other than those approved; this includes keeping them secure and not posted or shared to avoid unauthorized use.
9. Electronic mass-storage devices that contain Confidential Information, such as CD, DVD, USB drives, or external hard drives, shall be secured when not in use.
10. Printouts or copies of Confidential Information shall be immediately removed from copy/print/fax areas and devices.
11. Keys, access cards, and any device used by Radian Personnel to access Confidential Records shall be kept secure to prevent unauthorized use.
12. All Confidential Records shall be managed in accordance with the Records Management Policy and Information Handling Policy.
13. All Confidential Records shall be disposed of in accordance with the Records Management Policy and Enterprise Records Retention Schedule.

Policy Details

Section I – Office Workspace Inspections

Inspections will be conducted throughout Radian offices to ensure that a Clean Desk is maintained. In the ordinary course, People Leaders are expected to observe Workspaces for people in their organization to ensure compliance with this Policy. In addition, Inspection Ambassadors will conduct inspections on behalf of Records Management as follows:

- An Inspection Ambassador is anyone who is authorized or appointed by Records Management to inspect a Workspace.
- Inspection Ambassadors will periodically inspect Workspaces.
 - Inspections may be modified or placed on hold as a policy exception, for example during periods where nearly all Radian Personnel are working remotely or if other events occur that may delay or prevent inspections.
- For details on Workspace inspections, see the Clean Desk Standards.

Section II – Remote Workspace Adherence

All Radian Personnel who work remotely outside of a Radian office for any period of time must apply this Policy to their remote Workspace. For details on remote Workspace adherence, see the Clean Desk Standards.

Exceptions to this Policy

Exceptions to this policy must be sent to the Records Management Team. No actions that violate this policy should be taken without a documented response that includes a recommendation or specific approval from the AVP, Counterparty Risk and Records Management, SVP ERM, Chief Legal Compliance Officer, or General Counsel.

References

- Records Management Policy
- Records Management Standards
- Clean Desk Standards
- Information Classification Policy
- Information Handling Policy

Revision History

Revision	Date	Description	Author
1.1	March 5, 2019	Minor Edits; clarified scope	L. Burke
1.2	March 7, 2019	Removed references to Code of Conduct and Sensitive Information	B. Cohen
1.3	March 12, 2019	Minor edits	L. Burke, R. Lento
1.4	December 11, 2019	Formatting	B. Cohen, J. Schieber
1.5	October 21, 2021	Material edits for alignment with related policies, to include Confidential and Restricted Information, and to add a Walkthrough (inspection) exemption during periods where personnel are primarily working remotely.	J. Schieber
1.6	November 21, 2022	Minor edits for ownership	J. De Marco
1.7	November 21, 2023	Annual Review	J. De Marco
2.0	June 14, 2024	Changes made to inspections to reflect the current work environment, addition of new Roles and Responsibilities, alignment of content with Information and Data policies, updating of Key Terms & Definitions, and changes in the policy format to meet ECOC guidelines.	J. De Marco

Appendix

Term, Acronym or Abbreviation	Definition
<i>Clean Desk</i>	The establishment of a Workspace clear of Confidential Records. A Clean Desk does not have unattended Confidential physical paperwork, files, folders, computers with accessible information, removable electronic media storage or other mechanism of storing or presenting information.
<i>Confidential Information</i>	All Information that has not been released for public disclosure should be considered as at least Confidential Information. Confidential Information includes: Information whose loss or unauthorized disclosure might result in the impairment of Radian's operations or security, cause financial or reputational damage, or lead to possible legal liability, but does not meet the definition of Restricted Information. See Information Handling Policy for additional details.
<i>Confidential Records</i>	All Records or Company Records with Information that has not been released for public disclosure should be considered Records with Confidential Information.
<i>Information</i>	All information in all formats that is generated or received by the Company in connection with transacting its business, including but not limited to paper documents, e-mail, Web files, text files, messaging, handwritten notes, sound and movie files, PDF documents, data and databases, and all Microsoft Office or other formatted files, and information stored on and off company premises. See Information Handling Policy for additional details.
<i>Radian Personnel</i>	Radian Personnel is defined as: (i) employees (including full and part time employees and contract underwriters); (ii) temporary staff; (iii) consultants and vendors who are granted access to Radian's information systems and/or data as part of providing services to Radian; and (iv) others working on Radian's behalf.
<i>Records or Company Records</i>	Records or Company Records are all data and documents preserved in paper, photographic, electronic, or any other permanent or quasi-permanent format that have been received, collected, processed, or generated in connection with the Company's business. This includes, but is not limited to, paper documents and electronic Information. Electronic Information includes all documents, Information, and data, including all Records stored in an electronic medium (e.g., computer hard drives, e-mails, voicemails, disks, tapes, websites, intranet, extranet, databases), regardless of the software used to generate the document or item (e.g., Excel, GuardianPro, Word, Workday, etc.).
<i>Workspace</i>	An area utilized by Radian Personnel to conduct business activities which may be in a Radian office, a personal residence, or a public or semi-public area (e.g., a hotel lobby, airport, coffee shop, customer's office, etc.). Workspaces include the desk surface, adjoining surfaces, associated cabinets, whiteboards, shelves, and similar spaces.