City of Los Angeles
Responsible Banking & Investment Monitoring Program
For Investment Banks

Investment banks providing City investment banking services or seeking City
investment banking business must complete and submit this form no later than July
1st of each year to the City Administrative Officer to comply with Chapter 5.1, Section
20.95.1 of the Los Angeles Administrative Code.

Contact Information:

280 Securities

Name of Financial Institution

220 Montgomery St, Suite 1060  San Francisco  CA  94014

Street Address  City  State  Zip Code

Tom Lockard, Co-Founder & Managing Director

Contact Person Name and Title

(415) 218-9965  tlockard@280capmarkets.com

Telephone No.  Email Address

SOCIAL RESPONSIBILITY

Please answer the following questions for the preceding calendar year.

1. Did your firm make monetary donations to charitable programs within the City
limits?

   Yes ___ No  X

   If yes, please complete the attached form, labeled at Exhibit 1.

2. Did your firm provide any scholarship awards to residents of the City of Los
   Angeles?

   Yes ___ No  X

   a. How many scholarships were awarded? _______
   b. What was the total value of the awarded scholarships? _______

3. Does your firm have internal policies regarding utilization of subcontractors
   which are designated as “women owned,” “minority owned,” or “disabled”
   business enterprises? Yes ___ No  X

   If yes, please provide a copy of your policies, labeled as Exhibit 2
CONSUMER PROTECTION

1. Is the financial institution currently in compliance with all applicable consumer financial protection laws?
   Yes _X_ No ___
   If no, please briefly explain: __________________________________________________________
   __________________________________________________________________________________

2. Does the financial institution have policies to prevent the use of illegal predatory consumer adverse sales goals as the bases for evaluation, promotion, discipline or compensation of employees?
   Yes _X_ No ___
   If no, please briefly explain: __________________________________________________________
   __________________________________________________________________________________

3. Does the financial institution encourage and maintain whistleblower protection policies for its employees and/or customers to report suspected illegal practices, including predatory sales goals?
   Yes _X_ No ___
   If no, please briefly explain: __________________________________________________________
   __________________________________________________________________________________

4. In the last five years, has the financial institution been subject to any disciplinary actions such as fines, suspensions, or settlements, undertaken by the Securities and Exchange Commission, the Consumer Financial Protection Bureau, the Municipal Securities Regulation Board, the Financial Industry Regulatory Agency and/or any State regulatory agency?
   Yes ___ No _X_.

5. If the answer to question no. 4 is yes, please provide in separate attachment labeled Exhibit 3, what the violation(s) are, the reason for the enforcement action, what government agencies are involved, the date of the enforcement action, what is the current status, and how were or will the issues be resolved?
   __________________________________________________________________________________
   __________________________________________________________________________________
CERTIFICATION UNDER PENALTY OF PERJURY (*)

I certify under penalty of perjury that I have read and understand the questions contained in this form and the responses contained in the form and on all the attachments. I further certify that I have provided full and complete answers to each question, and that all information provided in response to this form is true and accurate to the best of my knowledge and belief.

Tom Lockard, Co-Founder & Managing Director  4/21/21
Print Name  Title  Signature  Date

(*) Signature must be that of the Head of Public Finance or equivalent corporate executive.

PLEASE SEND THE ORIGINAL SIGNED FORM TO THE ADDRESS BELOW AND EMAIL A COPY TO CAO.DEBT@LACITY.ORG.

Office of the City Administrative Officer
200 North Main St. Room 1500
Los Angeles, CA 90012
Attention: Debt Management Group
Attachment for Question #1 - Responsible Banking Investment Monitoring Program for Investment Banks

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<th>Name of Charitable Organization</th>
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Community Service
It is our intention via our community service program to make an impact in the communities in which we live and conduct business, through partnership with non-profit organizations via both financial support and volunteer work. In 2016, the firm relaunched its internal community affairs effort with an intention to empower our employees to give back to the community by participating in charitable and community philanthropic endeavors.

Targeted Financial Partnerships
Incapital has recently invested in targeted financial partnerships with organizations that provide support in achieving post-secondary success to underrepresented youth. Whether addressing the opportunity gaps faced by children of color in middle and high school, empowering and equipping girls in their pursuit of ambitious careers or helping young black men navigate and overcome difficult circumstances that threaten their future, the programs we support focus on skill development (emotional, social and technical) to better position underrepresented individuals for long-term success.

Targeted Organizations include:
• Gyrl Wonder
• BreakThrough Miami & the Coalition for Black Student Achievement of Palm Beach County
• BAM (Becoming a Man)

The Incapital Legacy™ Platform
We are particularly proud of the work we do as part of our Legacy™ Platform, which provides issuers and financial professionals the opportunity to offer products designed to generate measurable, values-based impact. These products directly support organizations that create positive social change through initiatives focused on strengthening communities (including providing affordable health care, housing & education) and increasing access to capital in underserved communities. Over the past 15 years, Incapital has led the way by distributing more than $2.5 billion of values-based investments that allow our non-profit partners to provide meaningful social impact in diverse, underserved communities.

Featured issuers on the Legacy Platform include:
• Calvert Impact Capital, which launched the Community Investment Note to support organizations creating positive social change.
• Capital Impact Partners, a nonprofit Community Development Financial Institution (CDFI) that provides financing and technical assistance to underserved communities nationwide.
• Century Housing Corporation, a mission-driven, not-for-profit CDFI that finances quality, affordable housing throughout California to provide dignified homes, healthy and hopeful futures, and economic independences to families, veterans, and seniors.
• International Finance Corporation (IFC), the largest international development institution focused on the private sector, supporting private sector development and job creation in developing countries.
• Local Initiatives Support Corporation (LISC) is one of America’s largest organizations supporting projects to revitalize communities and grow local economies.
• The World Bank (IBRD), an international organization that provides project loans and technical assistance to help its 189 member countries apply innovative solutions to create sustainable economic growth.