

CONTINUING DISCLOSURE POLICY

MONUMENT ACADEMY

1. **Purpose.** This Continuing Disclosure Policy (the “**Policy**”) is designed to (a) ensure compliance with the continuing disclosure undertaking of Monument Academy, a Colorado nonprofit corporation (the “**Charter School**”), and the Charter School’s Board of Directors (the “**Board**”) (including the Board’s officers, and Charter School staff in the exercise of their official duties), in connection with the Series 2026 Bonds (as hereinafter defined), compliance with all applicable federal and state securities laws in connection with issuance and disclosure undertakings relating to outstanding bonds issued on its behalf and annual financial information filings, and (b) promote best practices regarding disclosures disseminated to investors and the municipal securities markets by the Charter School. The Charter School currently operates a public charter school known as “Monument Academy” (the “**School**”).

2. **Disclosure.** The controls and procedures set forth herein shall apply to all Disclosure disseminated or communicated by the Charter School. “**Disclosure**” includes any information or communications reasonably likely to reach investors or the securities markets, such as preliminary and final offering documents relating to bonds issued for the benefit of the Charter School, filings made by the Charter School with the Municipal Securities Rulemaking Board or any national repositories (whether required by contract or made voluntarily), press releases which could reasonably be construed as intended for the financial markets, investor calls, rating agency presentations and other communications, and certain postings on the School’s website or any other website maintained by the Charter School.

3. **Disclosure in Connection with Outstanding Series 2026 Bonds.**

a. *Continuing Disclosure Obligations.* The Chair of the Board, or his or her designee (the “**Oversight Officer**”) shall be responsible for overseeing compliance by the Charter School with its continuing disclosure obligations, including but not limited to the compilation and filing of all annual and quarterly financial reports and filing of all annual financial statements of the Charter School on EMMA, as applicable. The Oversight Officer shall also consult with its dissemination agent appointed in connection with the applicable bond issue (the “**Dissemination Agent**”) to determine the materiality of any events and whether an event notice is required to be filed under the circumstances. If a determination is made that an event is material and a notice is required, the Oversight Officer shall work with the Dissemination Agent to prepare a draft of such notice in a timely manner. The Dissemination Agent shall be directed to file such notice in the required repositories once the notice has been approved by the Board or the Oversight Officer. Pursuant to the Continuing Disclosure Agreement, dated as of May 1, 2026 (the “**Continuing Disclosure Agreement**”), by and between the Charter School and Digital Assurance Certification, L.L.C. (“**DAC**”), DAC shall serve as the initial Dissemination Agent in connection with the \$42,935,000 Colorado Educational and Cultural Facilities Authority Charter School Refunding and Improvement Revenue Bonds (Monument Academy Project), Series 2026A and \$1,135,000 Colorado Educational and Cultural Facilities Authority Charter School Refunding and Improvement Revenue Bonds (Monument Academy Project), Federally Taxable Series 2026A (collectively, the “**Series 2026 Bonds**”).

b. *Voluntary Filings.* The Oversight Officer shall evaluate whether an event is appropriate for disclosure by the Charter School on a voluntary basis, based on investor demand or otherwise. Upon a determination that a voluntary notice should be filed, the Oversight Officer shall work with the Dissemination Agent to prepare a draft of such notice. The Dissemination Agent shall be directed to file such voluntary notice in the appropriate repositories once such notice has been approved by the Board or the Oversight Officer.

c. *Press Releases.* Press releases for the School will be prepared by the Oversight Officer. The Oversight Officer shall consult with the Board prior to approving such press release.

d. *Investor Communications.* The Oversight Officer shall be responsible for overseeing the responses to all telephone, email and other inquiries from existing and potential investors in the bonds. All staff of the Charter School shall transfer such inquiries to the Oversight Officer (or delegated staff under his/her supervision). Investors shall be directed to information provided on the School's website or shall be given a written response to any inquiry whenever practicable.

e. *Rating Agency Communications.* All information provided by the Charter School to any rating agency providing a rating for the Series 2026 Bonds, if applicable, shall be reviewed for accuracy and completeness and approved by the Oversight Officer.

4. **Training.** The Oversight Officer shall be responsible for coordinating regular training sessions for staff of the Charter School and its Board members about their obligations under the federal securities laws and regulations and other federal and state laws affecting the issuance of bonds. Training shall be provided for general background and overview purposes and, as applicable, to update staff of the Charter School and Board members concerning recent changes in applicable laws or regulations.

[Signature appears on following page]

[Signature Page to Continuing Disclosure Policy]

Executed this ____ day of _____, 2026.

MONUMENT ACADEMY,
a Colorado nonprofit corporation

By: _____
Name: _____
Title: President