



OKLAHOMA Water Resources Board

CONTINUING DISCLOSURE POLICY For New and Existing Bond Issues

OKLAHOMA WATER RESOURCES BOARD

This Disclosure Policy sets forth the process the Oklahoma Water Resources Board, Financial Assistance Division, will use to comply with its continuing disclosure obligations under the Securities and Exchange Commission (SEC) Rule 15c2-12 for its current outstanding bonds and for bonds it may issue in the future. The Municipal Securities Rulemaking Board (MSRB) through their online portal and Dataport, EMMA, the Electronic Municipal Market Access system, prescribe the method and form for online reporting of required information by CUSIP number.

The Oklahoma Water Resources Board will designate a Disclosure Officer to monitor its disclosure obligations.

Official Statement Preparation for Debt Issues in the Primary Market

The Official Statement is a document of the Issuer, and the Disclosure Officer should be involved in its preparation, along with the Financial Assistance Division (FAD) Attorney. The Disclosure Officer and FAD Attorney of the Oklahoma Water Resources Board will determine the information to be disclosed in the Official Statement to fairly present a description of the source of repayment and security for debt being offered. This includes the financial information and operating information to include. A time schedule for Official Statement preparation and information verification process should be established based on the schedule for each financing. Sufficient time and care should be taken to review accuracy and avoid material omissions. The Oklahoma Water Resources Board will provide final approval of the Official Statement prior to its publication.

Continuing Disclosure on Existing Debt Issues

In connection with each bond offering's Official Statement is a Continuing Disclosure Agreement (CDA) executed by the Oklahoma Water Resources Board in which the Oklahoma Water Resources Board agrees to make publicly available certain updated

financial information and operating data, as well as the annual audit no less than annually or as set forth in the Official Statement or other legal documents, as well as timely notice of specified Disclosure Events. Continuing Disclosure filings are required for each of the Oklahoma Water Resources Board's security types. The annual deadline in which Oklahoma Water Resources Board is required to make these filings is specified in the CDA in each Official Statement.

The Oklahoma Water Resources Board is required to adhere to its CDAs for so long as it has debt or bond obligations outstanding that are subject to continuing disclosure reporting. This continuing disclosure is to be made electronically to the MSRB at EMMA in the manner and form prescribed. EMMA serves as the centralized online official source for Official Statements for new issues of municipal securities and for continuing disclosures for outstanding issues.

Timely EMMA filings are required to meet CDA requirements and are a transparent way to communicate with investors and the public the Oklahoma Water Resources Board's required financial and operational information in a disciplined and uniform way.

Failure to file on EMMA the required financial information, annual audit or ACFR and Disclosure Event notices within the prescribed time and failure to disclose such failure in the future official statements may limit access to the capital markets or result in SEC enforcement actions.

Annual Report

The Oklahoma Water Resources Board Disclosure Officer is responsible for preparing the annual continuing disclosure information and filing or causing such information to be filed on a timely basis with EMMA. While the Oklahoma Water Resources Board retains responsibility for the timely preparation of the Annual Report and accuracy of information, and any Disclosure Event filings on EMMA, it may hire a dissemination agent to assist with its filings.

The Oklahoma Water Resources Board will establish or cause to be established an account on EMMA on which to maintain and monitor its continuing disclosure reporting. The Disclosure Officer will update and maintain this account as needed. The filings on EMMA will follow the prescribed format and method determined by the MSRB and the EMMA Dataport.

For the Oklahoma Water Resources Board, the annual financial information includes audited financial statements and other financial information, tables and operating data included within text, tables, charts, or other materials in the Official Statements for each outstanding bond issue.

The audited financial statements, tables and operating data, and financial information are due to be filed on EMMA no later than 180 days following the end of the fiscal year as

provided in each bond issue's CDA which would be December 27. If audited financial statements are not available prior to the designated due date, the required financial information and tables will be filed by the due date. Unaudited financials could be filed if the audit is not available by the deadline with a statement that the audited financial statements are not available at the time of filing and will be posted as soon as available. Once the audited financial statements are available, they will be filed within 10 days after receipt on EMMA in order to comply with Rule 15c2-12.

In the event of a late filing, the Oklahoma Water Resources Board will be required to document for five years in subsequent bond offerings and issues that it failed to timely file the required financial information.

Event Filings (Disclosure Events):

Disclosure Events are defined by SEC Rule 15c2-12 as follows and may be amended from time to time by the SEC:

Within 10 business days of the occurrence of a Disclosure Event the Oklahoma Water Resources Board Disclosure Officer will file on EMMA a Disclosure Event Notice.

Rule 15c2-12 Event Notices

- principal and interest payment delinquencies
- non-payment related defaults, if material
- unscheduled draws on debt service reserves reflecting financial difficulties
- unscheduled draws on credit enhancements reflecting financial difficulties
- substitution of credit or liquidity providers or their failure to perform
- adverse tax opinions, IRS notices or events affecting the tax status of the security
- modifications to rights of security holders, if material
- bond calls, if material
- defeasances
- release, substitution or sale of property securing repayment of the securities, if material
- rating changes
- bankruptcy, insolvency, receivership or similar event of the obligated person
- merger, consolidation, or acquisition of the obligated person, if material
- appointment of a successor or additional trustee, or the change of name of a trustee, if material
- Incurrence of a financial obligation of the obligated person
- Default, event of acceleration, termination event, modification of terms, or other similar events under the terms of a Financial Obligation of the Issuer, any of which reflect financial difficulties.

Additional/Voluntary Event-Based Disclosures

The Oklahoma Water Resources Board may choose to make available additional financial and operational information through a Voluntary Filing on EMMA. Voluntary disclosure is for financial information that is not subject to SEC Rule 15c2-12 that the Board chooses to make public through an EMMA voluntary filing. These voluntary event-based disclosures will be made on EMMA and associated with the Oklahoma Water Resources Board's account on EMMA.

Manner of submission

Submissions on EMMA are to be made in one or more portable document format (PDF) files configured to permit documents to be saved, viewed, printed, and retransmitted by electronic means. Submissions are to include the indexing as prescribed by the EMMA dataport and may be revised from time to time. Disclosure Counsel will review disclosure submissions to EMMA to ensure correct notification and compliance with Continuing Disclosure Documents.

Reporting

At least annually the Disclosure Officer will prepare information to be reported to Board Members on the Oklahoma Water Resources Board's continuing disclosure status. This report will include, but not be limited to, the information filed on EMMA, an update on the requirements to maintain compliance with SEC Rule 15c2-12, and any other regulatory updates that govern the issuance of debt obligations in the municipal bond market as necessary.

Training

The Disclosure Officer will strive to maintain knowledge of regulatory or market changes in obligations that may occur. If requested, the Disclosure Officer will conduct training of employees with responsibilities related to the Oklahoma Water Resources Board's Continuing Disclosure. This training may include a review of Oklahoma Water Resources Board's current Disclosure policy, SEC Rule 15c2-12 and an overview of Oklahoma Water Resources Board's obligations under federal securities laws.

The Disclosure Officer may arrange for a presentation, upon request, to the Board Members on their roles and responsibilities and potential liabilities in connection with the issuance of debt obligations. This may include information for issues in the primary market as well as ongoing continuing disclosure under applicable federal and state laws.

Investor Relations

The Oklahoma Water Resources Board may maintain an investor information section of its website. Items that are material to the Oklahoma Water Resources Board's securities will be included for the purpose of reaching the investing public. The Oklahoma Water Resources Board will take all reasonable measures to ensure that the information

conforms to applicable internal policies and federal, state, and local laws. Information included on its website should refer to or link to its EMMA filings as appropriate. An annual review of the website is required to ensure the most up-to-date information is available to investors.

The Oklahoma Water Resources Board will strive to ensure that all information regarding outstanding debt or other disclosable events, if subject to a disclosure obligation, will be publicly disseminated in a manner by which all may have equal and timely access. The purpose is to ensure that pertinent information is distributed in such a manner that no advantage will be gained from early access to information.

Documenting Compliance with Continuing Disclosure Policy

At least annually the Oklahoma Water Resources Board will review this policy to ensure compliance with SEC Rule 15c2-12 requirements and other voluntary continuing disclosure commitments. The Disclosure Officer will be responsible for making any changes or updates as needed to this policy.