



Joan W. Hartley
Shareholder
Admitted in SC, NC

May 15, 2026

Low-Income Housing Tax Credit Program
South Carolina State Housing Finance and Development Authority
300-C Outlet Pointe Blvd.
Columbia, South Carolina 29210

Re: Development: Worley Senior Apartments
 Address: West Side of Worley Road between Thrift Street and Pinedale Drive,
 Greenville (Greenville County TMS No. 0174010600500)
 Applicant: Worley Senior SC LLC

Ladies and Gentlemen:

This opinion is rendered in compliance with the requirements of the Low-Income Housing Tax Credit Program.

The undersigned is a licensed attorney-at-law, licensed to practice before the highest court in the State of South Carolina. A significant portion of my practice relates to the South Carolina Voluntary Cleanup Program (“VCP”), including tax matters for projects such as the Development, qualifying for the VCP and the South Carolina tax credits pursuant to S.C. CODE ANN. § 12-6-3550 (“South Carolina Brownfields Tax Credits”). We have been engaged as counsel to the Applicant in connection with the eligibility of the Development to participate in the VCP and qualification for the South Carolina Brownfields Tax Credits. I am familiar with the provisions of S.C. CODE ANN. § 12-6-3550 and have advised the Applicant with regard to its applicability to the above-referenced Development.

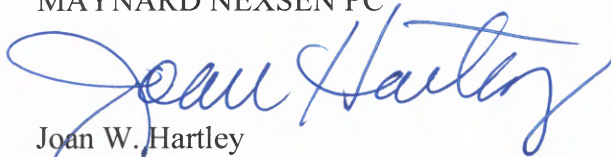
Based upon an independent investigation into the facts and circumstances surrounding the above-referenced Development and conditions on the Property as identified May 6, 2026 Report on the Phase I Environmental Site Assessment conducted by Stantec, and following consultation with the South Carolina Department of Environmental Services, which certifies the South Carolina Brownfields Tax Credits, I am of the opinion that the Development will be eligible for and the Applicant will qualify for the South Carolina Brownfields Tax Credits,

with the estimated amount of such tax credits being listed on the Applicant's application date May 15, 2026.

I am licensed to practice law only in South Carolina and North Carolina and do not purport to be competent on, or generally familiar with, or qualified to express legal conclusions based on, the laws of states other than South Carolina and North Carolina. In this matter, our review is specifically limited to the laws of the State of South Carolina. Our examination is based upon applicable laws, statutes, ordinances, rules and regulations as exist on this date, and we express no opinion as to the effect which any future amendments, changes, additions or modifications thereof may affect the transaction in the future, nor do we offer any opinion as to the suitability of zoning or land use restrictions. We assume no obligation to update or supplement our opinion to reflect any facts or circumstances that may hereafter come to our attention or changes in law, which may hereafter, occur. This examination is provided to you as an opinion only, and not as a guaranty or warranty of the matters discussed herein. This opinion is rendered solely for the benefits of the Authority in making its determination in connection with its consideration of a reservation of the Low-Income Housing Tax Credit for this Development. This opinion may not be relied upon by any person, firm, or entity other than South Carolina State Housing Finance and Development Authority.

Best regards,

MAYNARD NEXSEN PC



Joan W. Hartley

JWH/sw