



Pillar #1 Policies and Procedures

Licensing

<p>Purpose</p>	<p>To document mandated insurance licenses and corporate registrations (as applicable) so that Safe Harbor Title Company is able to remain in good standing with each state(s) in which they conduct business.</p>
<p>Scope</p>	<p>These policies and procedures are for all of (Safe Harbor Title Company hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.</p>
<p>Procedures</p>	<p>Licensing</p> <p>The Company maintains active agency (business entity) licenses as well as agent (employee, owner, producer, notary) licenses. When necessary, the Company also maintains active non-resident state licenses.</p> <p>The following people are licensed in accordance with § 38.2-1822 of the Code of Virginia, as amended, subsection A:</p> <ul style="list-style-type: none"> • Persons who give rate quotes • Persons who discuss coverage and exceptions • Persons who make underwriting decisions • Persons who sign commitments • Persons who sign policies <p>A tracking report (attached) is maintained by Safe Harbor Title Company as a monitoring control and periodically reviewed by Management to help ensure the appropriate business professionals are licensed and renewed when necessary.</p> <p>Licensed individuals, along with their active licenses, have been communicated to each underwriter. The underwriter is notified when a license becomes inactive.</p> <p>Licensed individuals maintain the necessary continuing education requirements including any necessary ethics requirements. Documentation is maintained to evidence the requirements have been met.</p> <p>The Company maintains and has on file the appropriate American Land Title Association Policy Forms License.</p>
<p>Attachments</p>	<p>Attached are the following:</p> <p>A. Tracking Report</p>

	<ul style="list-style-type: none"> B. ALTA Certificate of Membership C. VLTA Certificate of Membership D. Company License E. Employee's Licenses
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Contact Officer	<i>Melissa M. Canavos, President</i>
Date Approved	<i>May 1, 2016</i>
Date of Commencement	<i>May 1, 2016</i>
Amendment Dates	<i>No amendments</i>
Date for Next Review	<i>November 1, 2016</i>
Related References and Links	<ol style="list-style-type: none"> 1. <i>All original documentation is kept on file with Management and reviewed periodically for accuracy.</i>

Pillar #1 Policies and Procedures
<h1 style="margin: 0;">Licensing</h1> <h2 style="margin: 0;">Attachment A – Tracking Report</h2>

Safe Harbor Title Company
Date Updated: May 1, 2016

Objectives:

1. **To actively monitor all agency and agent licenses to ensure they are current.**
2. **To actively pursue additional licenses where necessary or encourage additional employees to become licensed.**
3. **To provide a consistent method of communicating new and expired licenses with underwriters.**

Note: Copies of actual licenses retained include but not are limited to insurance producer, closer, abstractor and notary.

Note: Copies of actual licenses are kept electronically in the safeharbortitle(\\safeharbor1113\shares)(Z:) drive.

Note: Copies of all completed continuing education materials for license renewals are kept electronically in the safeharbortitle(\\safeharbor1113\shares)(Z:) drive.

Name/Entity	State	License Type	License #	Expiration
Cindy K. Balsly	VA	Title Insurance	585655	Perpetual
Angela D. Molin	VA	Title Insurance	590996	Perpetual
Gail E. Markey	VA	Title Insurance	517933	Perpetual
Kenitra L. Newton	VA	Title Insurance	503293	Perpetual
Melissa M. Canavos	VA	Title Insurance	571820	Perpetual
Safe Harbor Title Co	VA	Title Insurance	104652	Perpetual
Safe Harbor Title Co	VA	Settlement Agent	104652	06/30/2018



Pillar #2 Policies and Procedures

Escrow/Trust Accounting

Purpose	Document escrow/trust internal controls are in place to meet requirements for the safeguarding of client funds and to minimize the exposure to loss of client funds.
Scope	These policies and procedures are for all of Safe Harbor Title Company (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	<p>Escrow funds and operating accounts are separately maintained.</p> <p>The Company maintains two (2) escrow accounts for real estate and mortgage loan transactions. Escrow/trust funds The Company maintains under a fiduciary capacity are not commingled with The Company’s operating funds or an employee or manager’s personal account.</p> <p>Escrow/Trust Accounts Trial Balance Reports.</p> <p>A trial balance report depicting the balance of a particular customer’s funds can be produced for each escrow/trust account at any time. This report depicts all individual customer file balances that do not have a zero balance. On a monthly basis, Precision Reconciliation Services reconciles the trial balance report to the bank balance and reconciled book balance, creating a “three way” reconciliation.</p> <p>Trial balance reports are produced for each escrow/trust account maintained by The Company, including recording accounts and underwriter premium accounts.</p> <p>Escrow/Trust Account Reconciliations</p> <p>It is the responsibility of all authorized Escrow Personnel to reconcile the escrow/trust accounts in conjunction with Precision Reconciliation Services. Account receipts and disbursements activity are reconciled daily (two-way). Monthly a three-way reconciliation between the bank records, book records, and trial balance is performed. This reconciliation is completed within 7 business days within receipt of the bank statement.</p> <p>A listing is kept of all escrow/trust accounts. This listing includes underwriter premiums accounts, recording accounts and dormant accounts.</p>

Escrow/trust account reconciliations are performed by **Precision Reconciliation Services** who does not have check signing authority or the capability/authority to perform wire transfer transactions.

Each month escrow/trust account reconciliations are reviewed by Company management and evidence of the review is documented. The escrow/trust account reconciliations are available to the title insurance underwriter at any time requested.

Escrow/trust account reconciling items are clearly noted on the reconciliations. These reconciling items are followed up and addressed by Management and Escrow Personnel within 3 business days of completion of the reconciliation so as to not carry over on the reconciliations from month to month.

Escrow/Trust Accounts are properly labeled and maintained in insured institutions.

Escrow/trust bank accounts are appropriately designated as “escrow” or “trust” accounts. This designation is noted in the original banking agreements as well as on our check stock, deposit slips, and bank statements. Unless mandated by state regulation or directed by a customer with a signed agreement, escrow/trust accounts are maintained with insured financial institutions.

Dormant file balances.

Customer files that continue to hold funds after the settlement date are reviewed periodically to determine if any disbursements have been made. Management approval by Melissa M. Canavos is required for any disbursement from an inactive escrow. An inactive escrow is defined as any escrow which has had no activity for the past six months. This approval is documented and maintained.

Banking Transactions conducted by authorized employees.

Via agreements with financial institutions, The Company management authorizes employees for escrow/trust bank account transactions. Wire transfer initiation and approval levels are set by The Company and reviewed for changes in staff routinely. Former employees are immediately deleted as signatories and authorized wire transfer individuals. A list of authorized individuals is maintained in the Escrow Account Information Report (see attached example). The individual(s) designated as the ‘wire transfer administrator’ to set-up and change online banking permissions has been authorized by management.

Authorized check signers and wire individuals do not maintain the escrow/trust accounting records or perform the escrow/trust account reconciliations.

Positive pay, ACH Blocks, and international wire blocks are used.

The “Positive Pay” feature offered by our financial institutions is used on escrow/trust accounts. Escrow Personnel and Management review the positive pay exception report within 1 business day of receipt. All positive pay reports are maintained and any exceptions are documented and explained.

ACH blocks and international wire blocks are placed on all escrow/trust accounts to prevent unauthorized users from withdrawing funds from the escrow/trust account.

	<p>Background checks.</p> <p>Before an individual is hired, a background check (criminal and credit) is performed by Castle Branch. Every 2 years a background check (including criminal and credit) is performed on existing employees who have access to escrow/trust account funds.</p> <p>Escrow/trust account training.</p> <p>The Company provides frequent escrow/trust account training as new products are available, new procedures are implemented and/or new Escrow Personnel are added to individuals handling customer funds and conducting escrow/trust account reconciliations. This training is conducted by Management, our Financial Institution and/or current Escrow Personnel. All training and continuing education is tracked and maintained by Management.</p>
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Related References and Links	<ul style="list-style-type: none"> • <i>Policies and procedures relating to escrow accounting and trust accounts are kept with Management.</i> • <i>Banking agreements and wire transfer user reports are kept with Management.</i> <ul style="list-style-type: none"> • <i>VA Escrow Regs: http://leg1.state.va.us/cgi-bin/legp504.exe?000+cod+55-525.24</i>



Pillar #3 Policies and Procedures

Privacy and Information Security

<p>Purpose</p>	<p>Document a privacy and information security program (policies and procedures) to help ensure Safe Harbor Title Company maintains written protocols for the protection of data and Non-public Personal Information (NPI).</p>
<p>Scope</p>	<p>These policies and procedures are for all of Safe Harbor Title Company (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.</p>
<p>Procedures</p>	<p>The Company has a formal privacy and information security program that is appropriate with the size and complexity, the nature and scope of the Company’s activities and the sensitivity of the information in the Company’s possession. As part of this program, The Company maintains a Privacy Policy Notice (see attached) that is posted on The Company’s website and provided to customers and consumers for each order processed. Additional information about The Company’s privacy and information security program is available to consumers and customers upon request.</p> <p>The Company policies associated with the privacy and information security program are given to all employees and the employees must acknowledge in writing that they have read and understand such policies. It is the responsibility of management to help ensure The Company has received all employee acknowledgements.</p> <p>The Company makes an assessment annually of the standards and requirements affiliated with The Company’s information security program, including those set out in this policy and procedure document. This assessment is conducted by Castle Branch and a formal report on compliance is issued to The Company management.</p> <p>Physical Security of NPI</p> <p>The Company utilizes Castle Branch as the information provider for background and credit checks. The Company individuals who have access to NPI is restricted to authorized principals and employees who have undergone a formal background check and credit report process which identified no irregularities.</p> <p>Removable media devices, including but not limited to external hard drives, compact discs, magnetic tapes and USB/flash drives are issued by the Company with the approval of management. The use of removable media</p>

devices is prohibited unless management has authorized such use. Removable media is kept in a secure area and accounted for via management when not in use.

Other standard procedures for security of NPI include closing paper files other than the one currently being worked on, stow files away when away from workspace and lock desks and file cabinets at the end of the day. Hardcopy NPI that is transmitted outside The Company is done so using only secured envelopes and/or locked document bags.

Network Security of NPI

At the direction of management, The Company's designated Network Administrator grants appropriate access to The Company's various computer technology applications. The Company's file server(s) or main central processing unit is housed in a locked room. The Company's computer network utilizes up-to-date anti-virus, anti-spyware and data encryption software applications. The Network Administrator is responsible for such software maintenance.

Access to The Company's information technology computers and network is secured by individual and unique passwords. The Company utilizes a computer application that prompts employees to change passwords in regular frequency every 30 days. All The Company's computers no mater, desktop or laptop run a "screen timeout" application causing automatic system sign off when the system detects no activity for a period of 3 minutes.

Disposal of NPI

The Company has defined and communicated to employees the types of data/information that falls into the NPI category. Any NPI data is disposed of accordingly. Paper records by shredding. Small shredders are available throughout the office. Large, secure shredding bins provided by Kodiak and can also be found in the office. When disposing of computers and portable storage devices, The Company uses a software application to erase/wipe clean the device.

Disaster Management Plan for NPI

The Company has a documented disaster management plan to help ensure adequate back-up, recovery and business continuation procedures. The plan also includes required procedures for notification and response to security incidents and breaches. The Company also maintains insurance coverage to include property & equipment coverage, interruption of business coverage and cyber-security coverage for such circumstances. The disaster management plan is reviewed on an annual basis by management and updated as appropriate.

Security Practices of Independent Service Providers

If independent service providers for The Company receive NPI from The Company, The Company shares this policy document with the service provider and/or conducts appropriate due diligence of the NPI security measures of the service provider before transmitting any NPI data. Service providers are aware they must notify The Company regarding NPI security breaches of NPI data that has been transmitted.

If security breaches occur, proper notification is provided to consumers and law enforcement in accordance with The Company's privacy and information security program and disaster management plan.

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Related References and Links	<ul style="list-style-type: none">• <i>Recording Log is kept with Transaction Coordinators.</i>• <i>Rate Manuals are kept online.</i>• <i>Post-Closing Reviews are kept with Operations Management.</i>



Pillar #4 Policies and Procedures

Document Recordation / Title & Settlement Pricing

<p>Purpose</p>	<p>Document recordation and rate/pricing procedures and policies to assist Safe Harbor Title Company in compliance with applicable contractual obligations and Federal and State Consumer Financial Laws.</p>
<p>Scope</p>	<p>These policies and procedures are for all of Safe Harbor Title Company (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.</p>
<p>Procedures</p>	<p>Pricing Procedures</p> <p>The Company utilizes rate manuals and online calculators, as appropriate to ensure correct fees are being charged for title insurance policy premiums, state-specific fees and endorsements.</p> <p>Employees are aware of contractual and statutory rate and pricing requirements. Title insurance policy premiums, state specific fees and endorsements are calculated in accordance with the title insurance underwriter or regulatory or promulgated rate manual through The Company’s software and/or through the use of title insurance underwriter rate calculators. All applicable rate discounts, such as Simultaneous Issue, Reissue, Refinance, and Substitution rates are calculated in accordance with the requirements in the rate manual.</p> <p>When rate change bulletins are received, the Operations Manager will communicate these rate changes to the appropriate parties and will test the accuracy of such changes and report the results to Company Management.</p> <p>Throughout the year a representative sample of closed files is subject to a post-closing review by one of our National Underwriters to conclude if fees were correctly charged.</p> <p>Recording Procedures</p> <p>Submit or ship documents for recording to the county recorder (or equivalent) or the person or entity responsible for recording within 2 business days of settlement.</p>

	<p>After review of county specific recording requirements documents are submitted for recordation by Underwriter-Approved Title Examiners. When available and economically feasible, document recordation will be processed electronically via E-recording. When E-recordings cannot be utilized or are not available and when The Company does not utilize an employee, documents will be shipped for recording. The Company ships documents using Fed Ex, tracks all packages and maintains tracking information for 12 months.</p> <p>Timely responses to recording rejections and verify recording is filed of record.</p> <p>The Company maintains a Recording Log to monitor all recordings. After documents are sent for recordation, The Company maintains contact with the appropriate personnel and parties to resolve any problems. The Company updates the Recording Log with information about outstanding recordings and rejected recordings, status and resolution. After documents are recorded, detailed information such as book, page, instrument number, time and date are included in the transaction file. Each week Operations Management reviews and signs off on the Recording Log.</p>
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Related References and Links	<ul style="list-style-type: none"> • <i>Recording Log is kept with Transaction Coordinators.</i> • <i>Rate Manuals are kept online.</i> • <i>Post-Closing Reviews are kept with Operations Management.</i>



Pillar #5 Policies and Procedures

Title Policy Production/Premium Remittance

<p>Purpose</p>	<p>Maintain written procedures related to title policy production, delivery, reporting and premium remittance to the insurer to help ensure Safe Harbor Title Company meets its legal and contractual obligations.</p>
<p>Scope</p>	<p>These policies and procedures are for all of Safe Harbor Title Company (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.</p>
<p>Procedures</p>	<p>Policy Inventory</p> <p>The Company receives its policy inventory electronically from the insurer. A Policy Inventory Report is maintained to track and monitor all of the paper and/or electronic policy numbers allocated to The Company. When policies are issued to customers, they move into an ‘issued’ status within the Policy Inventory reports.</p> <p>The following items are included in the Policy Inventory report:</p> <ul style="list-style-type: none"> • The date paper and/or electronic policies are received by or allocated to The Company • The file number associated with each policy number • Unused policies • Voided policies • Policy numbers assigned, but not yet reported to the insurer • Policy issued, but not yet reported to the insurer <p>In addition to the Policy Inventory report, The Company has a tracking system that identifies files that have closed for which policies have not been issued.</p> <p>Paper policy stock is kept locked up. Electronic policy stock is limited to authorized users with login and passwords.</p> <p>Policy inventory duties have been clearly defined and are the responsibility of licensed employees only. We are able to reconcile our policy inventory records with the Insurer’s records.</p> <p>Policy Issuance</p>

	<p>Policies are issued to customers (lender and/or purchaser) within 30 days after the transaction is disbursed. Electronic (or manual) logs (attached) are maintained within the software system to monitor all orders that have closed and disbursed in which final policies have not been issued.</p> <p>If The Company does not perform the settlement/closing, the order is tracked and monitored by the individual licensed agent assigned to the file to help ensure the documents are received within 30 days after disbursement.</p> <p>If a short-form lender's policy is issued, it can be delivered immediately after disbursement; however, monitoring procedures are still in place to help ensure the necessary documents are recorded.</p> <p>Premium Remittance and Policy Reporting</p> <p>In accordance with contractual or statutory obligations on a monthly basis, The Company reports to the insurer all title insurance policies (including endorsements), premiums and other fees as contractually obligated. Reporting is performed using the attached policy register report that has been approved by the insurer or via electronic upload through the insurer's electronic reporting web-based system. Physical copies of the policies are emailed (or mailed) to the insurer.</p> <p>A policy register report is maintained by each office that performs policy production.</p> <p>Premium remittance duties have been clearly defined and are the responsibility of senior licensed title agents in conjunction with Management. We are able to reconcile the premiums and fees we charged to our customers with the premiums and fees remitted to the insurer.</p>
Procedures	<p>Policy Inventory</p> <p>The Company receives its policy inventory directly from the insurer. A Policy Inventory Report is maintained to track and monitor all of the paper and/or electronic policy numbers allocated to The Company. When policies are issued to customers, they move into an 'issued' status within the Policy Inventory reports.</p> <p>The following items are included in the Policy Inventory report:</p> <ul style="list-style-type: none">• The date paper and/or electronic policies are received by or allocated to The Company• The file number associated with each policy number• Unused policies• Voided policies• Policy numbers assigned, but not yet reported to the insurer• Policy issued, but not yet reported to the insurer <p>In addition to the Policy Inventory report, The Company has a tracking system that identifies files that have closed for which policies have not been issued.</p> <p>Paper policy stock is kept locked up. Electronic policy stock is limited to authorized users with login and passwords.</p> <p>Policy inventory duties have been clearly defined and are the responsibility of senior licensed title agents in conjunction with management. We are able to reconcile our policy inventory records with the Insurer's records.</p>

	<p>Policy Issuance</p> <p>Policies are issued to customers (lender and/or purchaser) within 30 days after the transaction is disbursed. Electronic (or manual) logs (attached) are maintained within the software system to monitor all orders that have closed and disbursed in which final policies have not been issued.</p> <p>If The Company does not perform the settlement/closing, the order is tracked and monitored by the licensed title agent assigned to the file to help ensure the documents are received within 30 days after disbursement.</p> <p>If a short-form lender's policy is issued, it can be delivered immediately after disbursement; however, monitoring procedures are still in place to help ensure the necessary documents are recorded.</p> <p>Premium Remittance and Policy Reporting</p> <p>In accordance with contractual or statutory obligations on a monthly basis, The Company reports to the insurer all title insurance policies (including endorsements), premiums and other fees as contractually obligated. Reporting is performed using the attached policy register report that has been approved by the insurer or via electronic upload through the insurer's electronic reporting web-based system. Physical copies of the policies are emailed (or mailed) to the insurer.</p> <p>A policy register report is maintained by each office that performs policy production.</p> <p>Premium remittance duties have been clearly defined and are the responsibility of senior licensed title agents in conjunction with Management. We are able to reconcile the premiums and fees we charged to our customers with the premiums and fees remitted to the insurer.</p>
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Date for Next Review	<i>November 1, 2016</i>
Related References and Links	<ul style="list-style-type: none"> • <i>Policy Registers are maintained electronically on each Underwriters secure website.</i> • <i>The Policy Inventory report is kept electronically on each Underwriters secure website.</i>



Pillar #6 Policies and Procedures

Professional Liability Insurance

Purpose	Document procedures for review of professional liability coverage (errors and omissions insurance, fidelity and surety bond) so that Safe Harbor Title Company has financial capacity to cover its professional services obligations.
Scope	These policies and procedures are for all of Safe Harbor Title Company (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	<p>The Company is required by the Commonwealth of Virginia, as well as our title insurance underwriters, to maintain errors and omissions insurance, fidelity and surety bonds. Management is responsible for tracking and renewing each of these insurance coverages. The Company furnishes copies of all the insurance policies and applicable bonds to their title underwriter(s), including all endorsements, and proof of payment of the current premium.</p> <p>Professional Liability Insurance Coverage - Errors and Omissions</p> <p>The Company carries professional liability insurance for errors and omissions in accordance with The Company’s contractual obligations in the amount of \$1,000,000 per occurrence/\$2,000,000 aggregate issued by Landmark American Insurance Company, a company acceptable to our title insurance underwriter. This comprehensive liability policy has a deductible of no more than \$5,000 per loss. A copy of most current policy is attached.</p> <p>Fidelity Bond Coverage</p> <p>Fidelity coverage is required by the Commonwealth of Virginia, our title insurance underwriters, and as a general good business practice. The Company carries fidelity coverage of \$100,000 issued by Western Surety Company. A copy of most current bond is attached.</p> <p>When requested by the customer or required by state regulation, the Company will issue an insurer’s Closing Protection Letter (CPL) in connection with the settlement funds and issuance of a title insurance policy. This CPL will be issued via the insurer’s automated Closing Protection Letter system. When required by state regulation the Company will set aside funds in a statutory indemnity fund to cover fidelity losses not otherwise covered by the protections afforded by the insurer.</p>

	<p>Surety Bond Coverage</p> <p>Surety bond coverage is required by the Commonwealth of Virginia, our title insurance underwriters, and as a general good business practice. The Company carries surety coverage of \$200,000 issued by Western Surety Company. A copy of the most current bond is attached.</p>
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Amendment Dates	<i>No amendments.</i>
Date for Next Review	<i>November 1, 2016</i>
Related References and Links	<ul style="list-style-type: none"> • <i>Insurance policies are kept electronically with Management as well as with our Insurance Agent, Virginia Commonwealth Corporation.</i> • <i>Copies of our E&O, Fidelity and Surety are attached.</i>



Pillar #7 Policies and Procedures

Consumer Complaints

<p>Purpose</p>	<p>To establish a process for receiving and addressing consumer complaints to help ensure that Safe Harbor Title Company addresses any instances of poor service or non-compliance.</p>
<p>Scope</p>	<p>These policies and procedures are for all of Safe Harbor Title Company (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.</p>
<p>Procedures</p>	<p>Maintain a standard consumer complaint form that identifies information that connects the complaint to a specific transaction.</p> <p>The Company has a standard consumer complaint form (attached) and uses this to record any/all consumer complaints. As circumstances warrant, supporting documents are attached to the complaint form which provide additional information including communications, facts or specific details. Management documents approval on completed consumer complaint forms.</p> <p>Single point of contact for consumer complaints and process for routing consumer complaints to appropriate personnel.</p> <p>Management is the single point of contact at The Company for consumer complaints. The nature of the complaint determines to which appropriate personnel the complaint will be forwarded, if necessary.</p> <p>Log of consumer complaints that includes whether and how the complaint was resolved.</p> <p>The Company maintains a Consumer Complaint Log (attached) with information on all consumer complaints and their status. Company Management will periodically review, date and sign-off on the Consumer Complaint Log.</p>

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Amendment Dates	<i>List the dates the policy has been amended (Day Month Year)</i>
Date for Next Review	<i>May 1, 2015</i>
Related References and Links	<ul style="list-style-type: none">• <i>Reference where Consumer Complaint Form is kept.</i>• <i>Reference where the Consumer Complaint Log is kept.</i>



Settlement Standards

Standard Procedures & Controls for the Settlement/Closing Process

Minimum Control Standards	<ol style="list-style-type: none"> 1) Follow all lender's closing instructions. 2) A signed settlement statement that totals properly and is supported by written instructions for all amounts (i.e., closing instructions, invoices, written payoffs, etc.) is to be included in each closing file. If a settlement requires changes, a copy of the new statement with the changes clearly documented is to be maintained in the file. 3) Include in each closing file an accounting ledger/disbursement sheet that details all receipts (form of payment, date, and amount) and disbursements with date, transaction type, check number, payee, amount, and file's ending balance. 4) All receipts and disbursements are to agree to the final signed settlement statement. 5) All files are to balance to zero. If any balance remains, the date, reason for the balance, and to whom the balance belongs should be clearly documented in the file. 6) All receipts are to be supported by a copy of the check, wire confirmation, or numbered cash receipt, and deposited prior to or on the day of closing. 7) All disbursements are to be made only after "good funds" (according to state requirements) have been established. 8) Ensure that all commitment requirements are satisfied. 9) Record all documents for the transaction (mortgages, deeds, releases, etc.) with the proper authority in a timely manner. 10) Maintain appropriate supporting documentation in all closing files, including, but not limited to the following: <ol style="list-style-type: none"> a. Valid identification of parties to the transaction b. Properly executed affidavits, where required c. Documentation that Privacy statement(s) were provided to the appropriate parties (residential transactions only) d. Documentation that the Patriot Act requirements have been met (Sanctions List) e. FIRPTA (Foreign Investment Property Tax Act) requirements
Other Recommended Controls	<ol style="list-style-type: none"> 1) Any funds held after closing are to be held and disbursed in accordance with a formal escrow agreement executed by the appropriate parties. Include specific instructions as to when and how these funds are to be released in the agreement. 2) Maintain an anti-fraud program.

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