



**BEST PRACTICES
POLICIES & PROCEDURES**

Implementing
ALTA Best Practices

OFFICE LOCATION: 5979 VINELAND RD., ORLANDO, FL 32819 TEL. 407-499-2001 WWW.TRADITIONSTITLECO.COM

Contents

Definitions

Chapter 1 LICENSING

ALTA Best Practice 1: Establish and maintain current license(s) as required to conduct the business of title insurance and settlement services.

1. Company Policies and Procedures for Implementation and Adherence To Best Practice #1
2. Resources
 - a. EXHIBIT BP#1 – A – CURRENT LICENSE COPIES
 - b. EXHIBIT BP#1 – B – BEST PRACTICE #1 ASSESSMENT CRITERIA CHECKLIST

Chapter 2 ESCROW ACCOUNTS

ALTA Best Practice 2: Adopt and maintain appropriate written procedures and controls for Escrow Trust Accounts allowing for electronic verification of reconciliation.

1. Company Policies and Procedures for Implementation and Adherence To Best Practice #2
2. Resources
 - a. EXHIBIT BP#2 – A - SOFTWARE AND COMPANY RESOURCES FOR BEST PRACTICE #2
 - b. EXHIBIT BP#2 – B - ESCROW / TRUST ACCOUNT INFORMATION AND AUTHORIZATIONS
 - c. EXHIBIT BP#2 – C - BEST PRACTICE #2 ASSESSMENT CRITERIA CHECKLIST

Chapter 3 PRIVACY AND PROTECTION OF NON-PUBLIC PERSONAL INFORMATION

ALTA Best Practice 3: Adopt and maintain a written privacy and information security program to protect Non-public Personal Information as required by local, state and federal law.

1. Company Policies and Procedures for Implementation and Adherence To Best Practice #3
2. Resources
 - a. EXHIBIT BP#3 – A - PRIVACY AND PROTECTION OF NON-PUBLIC PERSONAL INFORMATION CHECKLIST
 - b. EXHIBIT BP#3 – B - THIRD PARTY SERVICE PROVIDERS WITH ACCESS TO NPI
 - c. EXHIBIT BP#3 – C - BEST PRACTICE #3 ASSESSMENT CRITERIA CHECKLIST

Chapter 4 REAL ESTATE SETTLEMENT PROCEDURES

ALTA Best Practice 4: Adopt standard real estate settlement procedures and policies that help ensure compliance with Federal and State Consumer Financial Laws as applicable to the settlement process.

1. Company Policies and Procedures for Implementation and Adherence To Best Practice #4
2. Resources
 - a. EXHIBIT BP#4 – A – BEST PRACTICE #4 ASSESSMENT CRITERIA CHECKLIST

Chapter 5 TITLE POLICY PRODUCTION

ALTA Best Practice 5: Adopt and maintain written procedures related to title policy production, delivery, reporting and premium remittance.

1. Company Policies and Procedures for Implementation and Adherence To Best Practice #5
2. Resources
 - a. EXHIBIT BP#5 – A – BEST PRACTICE #5 ASSESSMENT CRITERIA CHECKLIST

Chapter 6 PROFESSIONAL LIABILITY INSURANCE

ALTA Best Practice 6: Maintain appropriate professional liability insurance and fidelity coverage.

1. Company Policies and Procedures for Implementation and Adherence To Best Practice #6
2. Resources
 - a. EXHIBIT BP#6 – A – PROFESSIONAL LIABILITY INSURANCE AND FIDELITY BOND
 - b. EXHIBIT BP#6 – B – BEST PRACTICE #6 ASSESSMENT CRITERIA CHECKLIST

Chapter 7 ADDRESS CONSUMER COMPLAINTS

ALTA Best Practice 7: Adopt and maintain written procedures for resolving consumer complaints.

1. Company Policies and Procedures for Implementation and Adherence To Best Practice #7
2. Resources
 - a. EXHIBIT BP#7 - A – BEST PRACTICE #7 ASSESSMENT CRITERIA CHECKLIST

**POLICIES AND PROCEDURES MANUAL
FOR
TRADITIONS TITLE & ESCROW, LLC (hereinafter “Company”)**

It is the intent of this Company to be in full compliance with state and federal laws related to every area of our business. The procedures established herein are to be utilized as minimum controls for the operation of the business and for the education of staff in order to (1) follow federal and state consumer protection laws, (2) protect entrusted consumer funds, and (3) protect consumer and/or client non-public personal information. In addition, it is the intent of this Company to embrace the “Title Insurance and Settlement Company Best Practices” (“Best Practices”) standards recommended by the American Land Title Association (ALTA) to illuminate the level of professionalism, promote quality, ethical and professional service, provide for appropriate employee training and exceed all legal and regulatory standards. The Company already has procedures and policies in place to achieve all of these objectives, which are further detailed and enumerated in the following manual.

DEFINITIONS

1. **Background Check:** A background check is the process of compiling and reviewing both confidential and public employment, address, and criminal records of an individual or an organization. Background checks may be limited in geographic scope. This provision and use of these reports are subject to the limitations of federal and state law.
2. **Company:** Traditions Title & Escrow, LLC, being the entity implementing the best practices.
3. **Escrow:** A transaction in which an impartial third party acts in a fiduciary capacity for the seller, buyer, borrower, or lender in performing the closing for a real estate transaction according to local practice and custom. The escrow holders have fiduciary responsibility for prudent processing, safeguarding and accounting for funds and documents entrusted to them.
4. **Escrow Trust Account:** An account to hold funds in trust for third parties, including parties to a real estate transaction. These funds are held subject to a fiduciary capacity as established by written instructions.
5. **Federally Insured Financial Institutions:** A financial institution that has its deposits insured by an instrumentality of the federal government, including the Federal Deposit Insurance Corporation (FDIC) and National Credit Union Administration (NCUA).
6. **Licenses:** Title Agent or Producer License or registration, or any other business licensing requirement as required by state law, or a license to practice law, where applicable.
7. **Non-public Personal Information:** Personally identifiable data such as information provided by a Consumer on a form or application, information about a Consumer’s transactions, or any other information about a Consumer which is otherwise unavailable to the general public. Non-Public Personal Information (NPI) includes first name or first initial and last name coupled with any of the following: Social Security Number, driver’s license number, state-issued ID number, credit card number, debit card number, or other financial account numbers.
8. **Positive Pay or Reverse Positive Pay:** Any system by which the authenticity of a check is determined before payment is made by the financial institution against which the check is written.

9. **Settlement:** In some areas called a “closing” or “consummation” The process of completing a real estate transaction in accordance with written instructions during which deeds, mortgages, leases and other required instruments are executed and/or delivered, an accounting between the parties is made, the funds are disbursed and the appropriate documents are recorded.
10. **Trial Balance:** A list of all open individual escrow ledger record balances at the end of the reconciliation period.
11. **Three-Way Reconciliation:** A three-way reconciliation is a method for discovering shortages (intentional or otherwise), charges that must be reimbursed or any type of errors or omissions that must be corrected in relation to an Escrow Trust Account. This requires the escrow trial balance, the book balance and the reconciled bank balance to be compared. If all three parts do not agree, the difference shall be investigated and corrected.

**CHAPTER 1
LICENSING**

Best Practice #1: Establish and maintain current license(s) as required to conduct the business of title insurance and settlement services.

Purpose: Maintaining state mandated insurance licenses and corporate registrations (as applicable) helps ensure the Company remains in good standing with the state.

Company Policies and Procedures for Implementation and Adherence to Best Practice #1:

- 1. The Company establishes and maintains the following:**
 - a. Applicable business License(s) as listed on Exhibit A.
 - b. Compliance with Licensing, registrations, or similar requirements with the applicable state regulatory department or agency.
 - c. Compliance with ALTA's Policy Forms Licensing requirement.

- 2. All required licenses, state regulatory licenses, registrations or similar requirements and ALTA forms licenses are obtained in a timely manner and documented in a log which includes at a minimum licensee, license type, license number, expiration/renewal date.**

- 3. The log is reviewed and updated at a minimum of monthly to ensure accurate and timely tracking and renewal of licenses.**

- 4. The Principals and Employees of the Company:**
 - a. Maintain the necessary qualifications and requirements to obtain and maintain each state required license.
 - b. Pay, in a timely manner, any and all fees necessary to maintain each required license.
 - c. Perform any and all professional training necessary to maintain each required license.

- 5. Each Licensee that fails to perform all of the requirements necessary are be prohibited from performing such functions for which the license is required, until such time as the license is restored.**

PLEASE REFER TO THE BP#1 EXHIBITS FOR INCLUSION AS APPROPRIATE

Confirmed	Assessment Criteria
<input checked="" type="checkbox"/>	<i>Maintain applicable business license(s) and compliance with licensing, registration, or similar requirements with the applicable state regulatory department or agency</i>
<input checked="" type="checkbox"/>	<i>Maintain an electronic or hard-copy folder with up-to-date licensing information</i>
<input checked="" type="checkbox"/>	<i>If an ISSUING AGENT of title insurance, maintain a current license for the continued use of ALTA's policy forms.</i>

CHAPTER 2 ESCROW ACCOUNTS

Best Practice #2: Adopt and maintain appropriate written procedures and controls for Escrow Trust Accounts allowing for electronic verification of reconciliation.

Purpose: Appropriate and effective escrow controls and staff training help title and settlement companies meet client and legal requirements for the safeguarding of client funds. These procedures help ensure accuracy and minimize the exposure to loss of client funds. Settlement companies may engage outside contractors to conduct segregation of trust accounting duties.

Company Policies and Procedures for Implementation and Adherence to Best Practice #2:

In addition to following all applicable laws concerning trust accounting, the Company shall follow all of the following policies and procedures regarding Escrow and/or Trust Accounts:

1. Authorized Employees Only

- a. Only those employees whose authority has been defined to authorize bank transactions may do so. Transactions are to be conducted by authorized employees only.
- b. Appropriate authorization levels are set for employees by the Company and reviewed for updates annually.
- c. All employees with access to entrusted funds or NPI undergo pre-hire criminal background checks going back a minimum of five years.
- d. At least every three years, employees with access to entrusted funds or NPI undergo subsequent criminal background checks going back a minimum of five years.
- e. Ongoing annual training is performed for all employees with access to entrusted funds or NPI regarding the proper management of the Escrow and/or Trust Accounts.
- f. Former employees are immediately deleted as listed signatories on all bank accounts, including removing all computer access privileges to the Company network and/or any online banking functions.
- g. Company has an established list of personnel authorized to sign checks and initiate wire transfers with specific transactional limits. Limits are reviewed at least annually.
- h. Access to all company computers and programs to include banking portals are password protected and each user has a unique login that is confidential.

2. Trust Accounts Maintained At Insured Banks

- a. The Company maintains all Escrow and/or Trust accounts at federally insured financial institutions.
Banks: <http://research.fdic.gov/bankfind/>
Credit Unions: <http://researchcu.ncua.gov/views/findcreditunions.aspx>
- b. If directed in writing by the beneficial owner of certain funds to be held in trust, the Company may put those funds (and only those funds) in a separate trust account with an institution designated by the beneficial owner of said funds.

3. Separation of Accounts and Duties

- a. Regardless of how many Escrow / Trust Accounts are maintained by the Company:
 - i. Company funds and entrusted funds are NOT commingled.
 - ii. Operating accounts are separately maintained from all entrusted funds.
 - iii. Escrow / Trust accounts are separately maintained from all Company funds and properly identified, including, but not limited to, checks, deposit slips, ledgers, statements and all related supporting documentation.
- b. Escrow funds or any other funds which the Company maintains under a fiduciary duty to another are NOT commingled with an employee's, manager's or principal's personal account.
- c. Escrow Trust Accounts are properly identified as "escrow" or "trust" accounts.
- d. The Escrow / Trust account reconciliation authority and function is performed by someone who does not possess check signing and wire initiation authority and functions.

4. General Governing Rules for funds transfers

- a. International Wire Blocks, to prevent any wires from the Escrow / Trust accounts without additional authorization, are used where available.
- b. Automated Clearing House Blocks to prevent any ACH Transactions from the Escrow / Trust Account without additional authorization are used where available.
- c. Positive Pay and/or Reverse Positive Pay to verify the issuance of a check at the bank before clearing said check is used where available.
- d. Treasury management and bank fees are paid from the company's operating account.

5. Disbursement of funds and wire transfers

- a. Only those employees authorized by the company make any disbursement of funds by check writing or wire transfer.
- b. Unless initiated by a principal or owner of the Company, all wire transfers from the Escrow Trust account are initiated by a separate employee than the approver and each transfer is reviewed and approved by another authorized account signatory before funds are released from the account.

6. Reconciliation of Escrow Trust Accounts

- a. Outstanding file balances are documented.
- b. Reconciliation standards:
 - i. All Escrow / Trust Accounts are reconciled monthly.
 - ii. Receipts and disbursements are reconciled every day.
 - iii. Opening balance for the month matches the ending balance for the prior month's reconciliation or explanation and documentation accompanies the reconciliation.
 - iv. On at least a monthly basis, Escrow / Trust Accounts are prepared with Trial Balances ("Three-Way Reconciliation"), listing all open escrow balances.

IMPORTANT: Three Way Reconciliation documentation at a minimum includes bank statement, reconciliation sheet/summary page with book balance, outstanding deposits list/deposits in transit, open escrow file listing or trial balance and outstanding disbursements list all as of the reconciliation date. All amounts should equal between the book balance, reconciled bank balance and trial balance.

- v. Within TEN (10) days of the receipt of the bank statement, the Company performs the Three-Way Reconciliation.
 - vi. Within TEN (10) days of the discovery of an open exception, the Company resolves any and all open exceptions or documents reasons for the exception remaining open.
 - vii. Within TEN (10) days of the completion of the Three-Way Reconciliation, the Company resolves any and all open exceptions or documents reasons for the exception remaining open.
 - viii. In no event, shall an exception remain unresolved or unexplained from one Three-Way Reconciliation to the next.
 - ix. Within TEN (10) days of the completion of the Three-Way Reconciliation, the monthly Reconciliation is reviewed by a manager or supervisor of the Company who does not have check signing and wire initiation authority.
- c. The results of the Three-Way Reconciliation are available and electronically accessible by the Company's contracted title underwriter.

PLEASE REFER TO THE BP#2 EXHIBITS FOR INCLUSION AS APPROPRIATE.

A. Trust Accounting Requirements

a. RAMQUEST – COMPLETE CLOSING ENTERPRISE

Contact: (800)-542-5503

b. COLEMAN & ASSOCIATES

Janet Coleman

Contact: 707-485-8400

B. Criminal Background Check Solutions

a. Hollis Kendall Agency

Walt Kendall

Contact: 407-884-1895

BANK/FINANCIAL INSTITUTION:

AXIOM BANK

258 Southhall Lane, Suite 400

Maitland, Florida 32751

Account Name: Traditions Title & Escrow, LLC -

Escrow Account

Account #: 2100928676

Bank Contact: Trisha Delatte (321)316-4394 tdelatte@axiombanking.com**Authorized Account Signatories:**

Stacy Collins

Edward Storey III

Wire Transmittal Approval Authorization:

Stacy Collins

Edward Storey III

Exhibit BP#2 – C

Confirmed	Assessment Criteria
<input checked="" type="checkbox"/>	Maintain written procedures and controls for escrow accounts, hiring and training, and at a minimum, cover all sections of Best Practice #2.
<input checked="" type="checkbox"/>	List all active and inactive escrow accounts; including signatories, wire initiators and approvers, and verification that employee is in active status.
<input checked="" type="checkbox"/>	Maintain documentation that all active employees have had background checks and training on escrow account management.
<input checked="" type="checkbox"/>	Confirm that access to signatory stamps is limited to authorized signers.
<input checked="" type="checkbox"/>	Three way reconciliations are completed within 10 business days of closing day of the bank statement.
<input checked="" type="checkbox"/>	Monthly reconciliations are prepared by someone who does not have check signing or writing authority.
<input checked="" type="checkbox"/>	Reconciliations are reviewed and signed off by management or a supervisor.
<input checked="" type="checkbox"/>	Reconciliations, bank statements and supporting documentation are accessible electronically by the Company's contracted underwriter(s).
<input checked="" type="checkbox"/>	Accounts are in balance, contain all supporting reports and a proper three way reconciliation is being produced.
<input checked="" type="checkbox"/>	Confirm that escrow or trust accounts are clearly labeled as an escrow account.
<input checked="" type="checkbox"/>	Confirm that all other documents (e.g. statements) are clearly labeled by the bank.
<input checked="" type="checkbox"/>	Confirm that escrow checks, deposit slips and other related records maintain associated file numbers.
<input checked="" type="checkbox"/>	For inactive / dormant accounts, confirm senior management approval is obtained for any disbursement of funds.
<input checked="" type="checkbox"/>	For all active trust accounts, confirm the following: Agree opening bank and book balances to ending balance on prior month's reconciliation or differences are identified.
<input checked="" type="checkbox"/>	Investigate and resolve unusual bank activity (bank charges, insufficient fund charges and negative daily balances.
<input checked="" type="checkbox"/>	Confirm all bank charges are funded by the Company's operating account within 30 days of reconciliation.
<input checked="" type="checkbox"/>	Identify, investigate and resolve outstanding deposits.
<input checked="" type="checkbox"/>	Identify, investigate and resolve outstanding checks, particularly those that are time sensitive (payoffs, recording clerk, tax collector, hazard insurance, underwriter checks or other high risk items).
<input checked="" type="checkbox"/>	Identify, investigate and resolve significant file shortages, dormant funds, or miscellaneous funds.
<input checked="" type="checkbox"/>	Clearly document and determine validity of adjustments needed to bring the account in balance.
<input checked="" type="checkbox"/>	Confirm that no operating and escrow funds are comingled.
<input checked="" type="checkbox"/>	Review disbursement registers or cancelled checks to confirm no questionable activity.
<input checked="" type="checkbox"/>	Document and maintain record of activity for all interest-bearing accounts.
<input checked="" type="checkbox"/>	Confirm that all escrow trust accounts are maintained at Federally Insured Financial Institutions, unless otherwise directed.
<input checked="" type="checkbox"/>	Confirm a settlement statement, file ledger (disbursement statement), proof of incoming and outgoing funds and any other supporting documentation are maintained in each file.

CHAPTER 3
PRIVACY AND PROTECTION OF NON-PUBLIC PERSONAL INFORMATION

Best Practice #3: Adopt and maintain a written privacy and information security program to protect Non-public Personal Information as required by local, state and federal law.

Purpose: Federal and state laws (including the Gramm-Leach-Bliley Act) require title companies to develop a written information security program that describes the procedures they employ to protect Non-public Personal Information. The program must be appropriate to the Company's size and complexity, the nature and scope of the Company's activities, and the sensitivity of the Consumer information the Company handles. A Company evaluates and adjusts its program in light of relevant circumstances, including changes in the Company's business or operations, or the results of security testing and monitoring.

Company Policies and Procedures for Implementation and Adherence to Best Practice #3

1. Physical security of Non-public Personal Information

The Company:

- i. Restricts access to Non-public Personal Information to authorized employees who have undergone Background Checks at hiring.
- ii. Prohibits or controls the use of removable media.
- iii. Uses only secure delivery methods when transmitting Non-public Personal Information.
- iv. All areas containing Non-public Personal Information are only assessable to employees with authorized access and have keyed and coded entry at all entrances.

2. Network security of Non-public Personal Information

The Company:

- i. Maintains and secures access to Company information technology.
- ii. Developed and maintains guidelines for the appropriate use of Company information technology.
- iii. Ensures secure collection and transmission of Non-public Personal Information.
- iv. All information is stored in Ramquest Software and the OP2 Operating Platform and is only accessible by authorized users.
- v. Each authorized user has unique log in credentials and passwords to track all access to NPI.

3. Disposal of Non-public Personal Information

The Company:

- i. Adheres to Federal law which requires companies that possess Non-public Personal Information for a business purpose to dispose of such information in a manner that protects against unauthorized access to or use of the information.
- ii. Electronic information is stored and disposed of through secure systems.
- iii. Paper documentation containing NPI is destroyed by shredding and is removed from site to be disposed of.

4. The Company has an established Disaster Recovery Plan.

5. The Company exercises appropriate management and training of employees to ensure compliance with the Company's information security program.

6. The Company has oversight of service providers to help ensure compliance with the Company's information security program.

The Company

- i. Takes reasonable steps to select and retain service providers that are capable of appropriately safeguarding Non-public Personal Information.

7. Audit and oversight procedures are in place to ensure compliance with the Company's information security program.

The Company

- i. Reviews the privacy and information security procedures to detect the potential for improper disclosure of confidential information.

8. Notification of security breaches to customer and law enforcement

The Company

- i. Posts the privacy and information security program on all Company websites and provides program information directly to customers in useable form. When a breach is detected, the Company has a program to inform customers and law enforcement as required by law.

PLEASE REFER TO THE BP#3 EXHIBITS FOR INCLUSION AS APPROPRIATE

General

1. Traditions Title & Escrow, LLC is responsible for all documentation and maintenance of all NPI policies and procedures.
2. Have you identified those individuals within your firm, and any vendor or other party who may provide a service to your company, who may have access to NPI? Yes No
- a. If YES, list: CopiSolutions (the company's IT provider); and
- b. Coleman and Associates (accounting and reconciliations)
3. Do you have an information security program/policy to protect NPI? Yes No
- a. Is it updated annually? Yes No
- b. Does the information security program/policy include:
- i. Locations, systems, and methods for storing, processing, transmitting, and disposing of its customer information? Yes No
- ii. Potential internal and external threats that could result in unauthorized disclosure, misuse, alteration, or destruction on Non-public Personal Information or customer information systems and assessments of the likelihood and potential damage to the Company and its customers of these threats? Yes No
- iii. Procedures for monitoring, detecting attacks/intrusions and responding to incidences? Yes No
- c. Does it include a disaster recovery plan? Yes No
- i. If YES, does it include a procedure for data and system backup and business resumption to protect against destruction, loss, or damage of information from potential environmental hazards, such as fire and water damage or technological failures? Yes No
- d. Is the program/policy tested by a qualified independent staff? Yes No
- i. Does it include in the testing?
1. Management's documented approach for testing the information security program and evidence of testing? Yes No
2. Frequency of testing of the information security program? Yes No
3. Documentation of approach for tracking and remediating exceptions and/or control gaps? Yes No
- e. Does it limit access to information systems containing NPI to authorized users only? Yes No
- f. Does it include a provision for immediate removal of access by terminated employees? Yes No
- g. Does it include five year background check upon hiring or within the three years on all employees? Yes No
- h. Have employees been trained on this program/policy? Yes No
- i. Do employees sign an acceptable use of information technology asset agreement annually? Yes No
- j. Does it include policies and procedures over record retention and disposal? Yes No
- k. Is access to the program/system password protected and require password updates regularly? Yes No
- l. Does each user have their own credentials and password? Yes No
4. Do you provide a Privacy Policy to customers? Yes No
- a. Is a privacy statement also included on your company website? Yes No
- i. If YES, does the statement clearly disclose what NPI is obtained on the site? Yes No

Physical

5. What type of physical security does your office have to limit access to NPI to authorized personnel?

Locked Building
 Burglar Alarm

Locked Offices
 Shredding of NPI

6. Do you have off-site storage of physical files? Yes No
- If YES, is it: *(Check as appropriate)*
- | | |
|---|--|
| <input type="checkbox"/> Secure Storage Company | <input type="checkbox"/> Self-Storage Facility |
| <input type="checkbox"/> Owned | <input type="checkbox"/> Leased |
| <input type="checkbox"/> Alarmed | <input type="checkbox"/> Locked |

Digital

7. Website:
- a. Does your company or firm have a website? Yes No
- b. If YES, is any NPI collected through your firm website? Yes No
- i. If YES, is the connection for collection of NPI encrypted? Yes No

8. Computers:
- a. How many computers do you have in your office (not counting servers)? ³
- i. Do only authorized personnel have access to Company hardware? Yes No
- ii. Is only authorized software installed on Company hardware? Yes No
- b. How many computer servers do you have in your office? ¹
- i. Are settings in place for restriction of removable media? Yes No
- c. Do you have a separate computer exclusively for online banking functions? Yes No
- d. Are the computers at your firm configured as part of a Local Area Network (LAN)? Yes No
- e. Are the internal hard drives in the computers encrypted? Yes No
- f. Are there restrictions for the use of removable media (ex. USB, CD/DVD drives)? Yes No
- g. Do you have procedures for monitoring, detecting and responding to attacks/intrusions? Yes No
- i. Do you perform an independent third party network security assessment annually that includes intrusion detection and penetration testing and act on the recommendations of the service provider? Yes No
- h. Are computers set to "go dark" after a set time period of inactivity, requiring password to restart? Yes No

9. Computer Back Ups:
- a. Are your computers backed up regularly? Yes No
- i. If YES, how often? Daily Monthly
- ii. If YES, how long are backups saved? Daily Weekly Monthly Annually
- b. Are your servers backed up regularly? Yes No
- i. If YES, how often? Weekly Monthly
- ii. If YES, how long are backups saved? Daily Weekly Monthly Annually
- c. Are backups secured in an off-site location? Yes No

10. Internet Connection:
- a. Are your computers connected to the internet? Yes No
- If YES:
- i. Are they protected by a Firewall? Yes No
- ii. Are your computers protected from computer viruses and malware? Yes No
- iii. Are your servers protected from computer viruses and malware? Yes No
- iv. How often is the virus and malware protection software updated? Hourly Daily Weekly Monthly Annually
- v. Is the virus protection update process automated? Yes No

11. Passwords:
- a. Are all computers at your company or firm password protected? Yes No
- If YES:
- i. Does each user have a separate login account and kept secret and secure? Yes No
- ii. Are the passwords complex? Yes No
(e.g. at least 8 characters, with capital and lower case letters, and numbers)
- iii. How often are the passwords changed? Monthly Quarterly Annually Never

12. Email:

a. Do you have email? YES

i. If YES, is there a central account?

1. If NO, is there a separate email for most of the people in your firm?

ii. If YES, is it a firm specific email (e.g. you@yourcompany.com)

1. If YES, is it housed on site (e.g. Microsoft Exchange Server)

iii. If YES, does your firm send NPI over email

iv. If YES, does your firm have encrypted email?

<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No

SOFTWARE PROVIDER:

RamQuest, Inc.
5801 Tennyson Parkway, Suite 500
Plano, Texas 75024
Phone: 800-542-5503
Current Software: Complete Closing Enterprise

TECHNICAL SUPPORT/MAINTENANCE:

CopiSolutions
1712 Lee Road
Orlando, FL 32810
Tel. 407-401-9696

RamQuest, Inc.
5801 Tennyson Parkway, Suite 500
Plano, Texas 75024
Phone: 800-542-5503
Current Software: Complete Closing Enterprise

RECONCILIATION SERVICES:

Coleman & Associates
1911 Gulf Beach Blvd.
Tarpon Springs, FL 34689
Tel. 727-485-8400

Confirmed	Assessment Criteria
<input checked="" type="checkbox"/>	<i>Develop, document and maintain an Information Security Program / Policy to protect its NPI, ensuring it is updated at least annually.</i>
<input checked="" type="checkbox"/>	<i>Confirm employees are trained on the Company's Information Security Program / Policy.</i>
<input checked="" type="checkbox"/>	<i>Develop, document and maintain an Information Security Risk Assessment, including the risk ranking of information systems.</i>
<input checked="" type="checkbox"/>	<i>Verify that Information Security Risk Assessment includes locations, systems and methods for storing, processing, transmitting and disposing of its Consumer information.</i>
<input checked="" type="checkbox"/>	<i>Verify that Information Security Risk Assessment identifies internal and external threats that could result in unauthorized disclosure, misuse, alteration or destruction of Non-public Personal Information or Consumer information systems and assess the likelihood and potential damage to the Company and its Consumers.</i>
<input checked="" type="checkbox"/>	<i>Confirm and document that key controls, systems and procedures of the Information Security Program are regularly tested by qualified independent staff in accordance with the risk assessment.</i>
<input checked="" type="checkbox"/>	<i>Confirm and document that Information Security Program includes management's approach for testing and tracking remediation and evidence and frequency of testing.</i>
<input checked="" type="checkbox"/>	<i>Confirm and document that employees complete an acceptable use of information technology assets agreement on a periodic basis.</i>
<input checked="" type="checkbox"/>	<i>Review and document the policies and procedures to verify logical access to information systems containing Non-public Personal Information is restricted to authorized persons only.</i>
<input checked="" type="checkbox"/>	<i>Retain documentation in employee's files regarding access and approval to systems.</i>
<input checked="" type="checkbox"/>	<i>Develop, document and maintain a process for removing access to Non-public Personal Information for terminated employees.</i>
<input checked="" type="checkbox"/>	<i>Confirm that administration access rights to systems containing Non-public Personal Information are not assigned to personnel performing business transactions within the system.</i>
<input checked="" type="checkbox"/>	<i>Periodical review by management of employee access to confirm that only required employees have access to information systems necessary to perform job functions.</i>
<input checked="" type="checkbox"/>	<i>Develop, document and maintain logical access controls which include unique user id's and complex passwords.</i>
<input checked="" type="checkbox"/>	<i>Develop, document and maintain policies regarding the use of removable media (USB, CD, DVD).</i>
<input checked="" type="checkbox"/>	<i>Provide encryption of electronically transmitted or stored Non-Public personal Information.</i>
<input checked="" type="checkbox"/>	<i>Document and maintain procedures for monitoring, detecting attacks / intrusions into Consumer information systems and responding to incidents. If outsourced, document evidence of management review.</i>
<input checked="" type="checkbox"/>	<i>Document employee access to physical locations containing Consumer information (buildings, computer facilities, record storage facilities).</i>
<input checked="" type="checkbox"/>	<i>Document and maintain a Clean Desk Policy.</i>
<input checked="" type="checkbox"/>	<i>Document and maintain Change Management Procedures when technology and business functions change.</i>
<input checked="" type="checkbox"/>	<i>Develop procedures for system modifications (hardware and software), ensuring that the changes are documented, tested and approved.</i>
<input checked="" type="checkbox"/>	<i>Develop, document and maintain procedure for data and system backup and business resumption (Disaster Recovery Plan).</i>
<input checked="" type="checkbox"/>	<i>Document all third party providers who have access to Non-Public personal Information and your process for selecting your third party.</i>
<input checked="" type="checkbox"/>	<i>Establish controls to monitor security procedures of service providers to safeguard Consumer information.</i>
<input checked="" type="checkbox"/>	<i>Document the process for providing Privacy Policy to Consumers.</i>
<input checked="" type="checkbox"/>	<i>Confirm that Privacy Policy is included on the Company's website, if applicable.</i>
<input checked="" type="checkbox"/>	<i>Confirm that the website's privacy statement accurately discloses what Non-public Personal information is obtained on the site.</i>
<input checked="" type="checkbox"/>	<i>Develop, document and maintain policies and procedures for record retention and disposal.</i>
<input checked="" type="checkbox"/>	<i>If document / electronic media disposal services are provided by a third party, obtain evidence of the contract agreement / SLA and a recent document disposal certificate from the vendor.</i>

CHAPTER 4
REAL ESTATE SETTLEMENT PROCEDURES

Best Practice #4: Adopt standard real estate settlement procedures and policies that help ensure compliance with Federal and State Consumer Financial Laws as applicable to the settlement process.

Purpose: Adopting appropriate policies and conducting ongoing employee training helps ensure the Company can meet state, federal, and contractual obligations governing the Settlement.

Company Policies and Procedures for Implementation and Adherence to Best Practice #4:

1. Recording Procedures

The Company:

- a. Reviews legal and contractual requirements to determine Company obligations to record documents and incorporate such requirements in its written procedures.
- b. Submits documents electronically for e-recording or ships documents for recording to the county recorder or the person or entity responsible for recording within two (2) business days of the later of (i) the date of Settlement, or (ii) receipt by the Company if the Settlement is not performed by the Company.
- c. Tracks shipments of documents for recording.
- d. Ensures timely responses to recording rejections.
- e. Addresses rejected recordings within two (2) business days to prevent unnecessary delay.
- f. Verifies that recordation actually occurred and maintains a record of the recording information for the document(s).

2. Pricing Procedures

The Company:

- a. Customers are charged the correct title insurance premium and other rates for services provided by the Company according to the promulgated rates set by the State of Florida.
- b. Utilizes rate manuals and online calculators, as appropriate, to help ensure correct fees are being charged for title insurance policy premiums, state-specific fees and endorsements.
- c. Ensures discounted rates are calculated and charged when appropriate, including refinance and reissue rates.
- d. Performs quality checks files after Settlement to ensure consumers were charged the Company's established rates and the proper regulatory rate set by the state.
- e. Provides timely refunds to consumers when an overpayment is detected.

PLEASE REFER TO THE BP#4 EXHIBITS FOR INCLUSION AS APPROPRIATE.

Confirmed	Assessment Criteria
<input checked="" type="checkbox"/>	<i>Submit or ship document for recording within 2 business days of settlement or receipt of necessary documents if settlement is not performed by the company.</i>
<input checked="" type="checkbox"/>	<i>Maintain a tracking log of documents shipped for recording and rejected recordings ensuring that documents are shipped timely and rejections are addressed timely.</i>
<input checked="" type="checkbox"/>	<i>Maintain written procedures to ensure that customers are charged the correct title insurance premium and other rates for services provided by the company.</i>
<input checked="" type="checkbox"/>	<i>Utilize rate manuals and online rate calculators, as appropriate, to ensure correct fees are being charged for title insurance policy premiums, state-specific fees and endorsements.</i>
<input checked="" type="checkbox"/>	<i>Ensure discounted rates are calculated and charged when appropriate.</i>
<input checked="" type="checkbox"/>	<i>Quality check process is in place after Settlement to ensure consumers were charged the company's established rate.</i>
<input checked="" type="checkbox"/>	<i>Process in place to ensure timely refunds are provided to consumers when an overpayment is detected.</i>

CHAPTER 5
TITLE POLICY PRODUCTION

Best Practice #5: Adopt and maintain written procedures related to title policy production, delivery, reporting and premium remittance.

Purpose: Adopting appropriate procedures for the production, delivery, and remittance of title insurance policies helps ensure title companies can meet their legal and contractual obligations.

Company Policies and Procedures for Implementation and Adherence to Best Practice #5:

As an Issuing Agent:

1. Policy Issuance

The company maintains the following policies and procedures for title policy production and delivery and underwriter remittance:

- a. Title insurance policies are Issued at the time of closing and delivered to customers generally within one (1) week if not delivered at the time of closing, but no later than thirty (30) days of the later of (i) the date of Settlement, or (ii) the date that the terms and conditions of the title insurance commitment are satisfied.
- b. Files are kept by post-closing department until recording is returned properly filed of record. Upon receipt of recording the file is reviewed to insure that policy has been issued and recorded documents are mailed out.
- c. File is reviewed to assure all outstanding items as shown on the commitment have been satisfied.
- d. File is checked for any outstanding file balance overage and brought to zero balance and file is locked to limit any future, unauthorized access.

2. Underwriter Reports and Remittance

By the last day of the month following the month in which an insured transaction was settled, the Company:

- a. Reports to the title insurance underwriter all of the policies issued during the current month.
- b. Remits to the title insurance underwriter all of the premiums and fees collected and due to the title underwriter.

PLEASE REFER TO THE BP#5 EXHIBITS FOR INCLUSION AS APPROPRIATE:

Confirmed	Assessment Criteria
<input checked="" type="checkbox"/>	<i>Maintain written procedures related to title insurance policy production, delivery, reporting and premium remittance.</i>
<input checked="" type="checkbox"/>	<i>Title insurance policies are issued and delivered to customers in a timely manner to meet statutory, regulatory or contractual obligations.</i>
<input checked="" type="checkbox"/>	<i>Title insurance policies are issued and delivered within 30 days of the later of the (i) date of Settlement, or (ii) the date that the terms and conditions of title insurance commitment are satisfied.</i>
<input checked="" type="checkbox"/>	<i>Title insurance policies (including a copy of the policy) are reported to the underwriter by the last day of the month following the month in which the insured transaction was settled.</i>
<input checked="" type="checkbox"/>	<i>Title insurance premiums are remitted to the underwriter by the last day of the month following the month in which the insured transaction was settled.</i>

CHAPTER 6
PROFESSIONAL LIABILITY INSURANCE

Best Practice #6: Maintain appropriate professional liability insurance and fidelity coverage.

Purpose: Appropriate levels of professional liability insurance or errors and omissions insurance help ensure title agencies and settlement companies maintain the financial capacity to stand behind their professional services. In addition, state law and title insurance underwriting agreements may require a Company to maintain professional liability insurance or errors and omissions insurance, fidelity coverage or surety bonds.

Company Policies and Procedures for Implementation and Adherence to Practice #6:

The Company

- a. Maintains and shall continuously maintain professional liability insurance or errors and omissions insurance in an amount appropriate given the Company's size and complexity and the nature and scope of its operations. The amount is not less than the amount agreed to in the Company's contractual obligations to its underwriter and state law, if applicable. This includes but is not limited to:
 - i. Professional Liability or Errors and Omissions Insurance
 - ii. Fidelity Bond Coverage– (Protection for Company Against Employee Dishonesty)
 - iii. Surety Bond Coverage
 - iv. Cyber Fraud / Cyber Crime Coverage
 - v. Other coverages required by state law or the title insurance underwriting agreements in effect.
- b. The Company updates and renews all policies annually.
- c. The Company maintains proof that third party service providers listed in this guide carry appropriate insurance to cover the services provided.

PLEASE REFER TO THE BP#6 EXHIBITS FOR INCLUSION AS APPROPRIATE:

THE REFERENCED POLICIES ARE ATTACHED TO THIS EXHIBIT A AND ARE HEREBY INCORPORATED AS PART OF THIS EXHIBIT.

Confirmed	Assessment Criteria
<input checked="" type="checkbox"/>	<i>Maintain professional liability insurance or errors and omissions insurance.</i>
<input checked="" type="checkbox"/>	<i>Maintain and comply with additional requirements for professional liability insurance, errors and omissions insurance, fidelity coverage or surety bonds, as provided by state law or title insurance underwriting agreements.</i>

CHAPTER 7
ADDRESS CONSUMER COMPLAINTS

Best Practice #7: Adopt and maintain written procedures for resolving consumer complaints.

Purpose: A process for receiving and addressing consumer complaints helps ensure reported instances of poor service or non-compliance do not go undiscovered.

Company Policies and Procedures for Implementation and Adherence to Best Practice #7:

1. All Consumer Complaints are reported to a member of management and tracked by management in a secure location.

2. Consumer Complaint Contact and Responsibilities

- a. The complaint contact for the Company is Stacy Collins. The complaint contact is responsible for:
 - i. Supervising the entire Consumer Complaint Process
 - ii. Ensuring that time requirements for addressing consumer complaints are met;
 - iii. Administering and maintaining the Consumer Complaint log;
 - iv. Administering and maintaining the Consumer Complaint files in an orderly and professional manner, including but not limited to:
 - 1) Consumer Complaint Intake Form
 - 2) All correspondence related to the Consumer Complaint; and
 - 3) All supporting documentation related to the Consumer Complaint.
 - v. Investigating the nature and credibility of the Consumer Complaint, including but not limited to:
 - 1) Investigation of the Consumer Complaint;
 - 2) Making a determination as to the validity and credibility of the Consumer Complaint;
 - 3) Making a determination as to the person or persons (inside or outside the Company) that is responsible for the facts and circumstances that led to the Consumer Complaint;
 - 4) Making a determination as to the best possible resolution for the Consumer Complaint; and
 - 5) Pursuing the best possible resolution for the Consumer Complaint; and
 - vi. Informing the Board of Directors and/or principals of the Company of the status of filed, resolved and unresolved complaints on at least a monthly basis.

3. Consumer Complaint Intake

- a. Every employee is informed and aware that Consumer Complaints may come to the Company in many forms, including but not limited to,:
 - i. Phone Calls
 - ii. Letters (Regular Mail)
 - iii. Certified Mail

- iv. Emails
 - v. Voice Mail
 - vi. Legal Action
- b. If an employee hears something that sounds like a Consumer Complaint, the Complaint Intake Form shall be completed and processed.

4. Consumer Complaint Policy

While not every Consumer Complaint will be the responsibility of the Company, the Company remains dedicated to pursuing a resolution for each Consumer Complaint that is preferable and acceptable to the Consumer and the Company.

PLEASE REFER TO THE BP#7 EXHIBITS FOR INCLUSION AS APPROPRIATE:

Exhibit BP#7 – A [Best Practice #7 Assessment Criteria Checklist]

Confirmed	Assessment Criteria
<input checked="" type="checkbox"/>	<i>Maintain written procedures for resolving consumer complaints which includes a standard complaint form, single point of contact, procedures for forwarding complaints to appropriate personnel and logging and resolution of complaints.</i>
<input checked="" type="checkbox"/>	<i>Establish and maintain a standard consumer complaint form that identifies information that connects the complaint to a specific transaction.</i>
<input checked="" type="checkbox"/>	<i>Establish a single point of contact for consumer complaints.</i>
<input checked="" type="checkbox"/>	<i>Establish and maintain a log of consumer complaints that includes whether and how the complaint was resolved.</i>

Code of Business Conduct and Ethics

This Code of Business Conduct and Ethics covers a wide range of business practices and procedures. It does not address every situation that may arise, but it sets forth basic principles to guide you. We expect all of the employees of Traditions Title & Escrow, LLC, "the Company" to conduct themselves according to this Code and to seek to avoid even the appearance of improper behavior. If a law conflicts with this Code, always comply with the law; however, if a local custom or policy conflicts with this Code, you must comply with the Code. If you have any questions about such a conflict, discuss the situation with your supervisor. Anyone who violates this Code will be subject to disciplinary action up to and including dismissal. If you are in or if you observe a situation that you believe is or may lead to a violation of the Code, follow the guidelines set forth in Sections 13 and 14 below.

1. Compliance with Laws, Rules and Regulations

Obedying the law, both in letter and in spirit, is one of the foundations on which the Company's ethical standards were built. We expect all of our employees to obey the laws of the cities and states in which we do business and all federal laws, including all federal securities laws, rules and regulations. Perceived pressures from supervisors and demands due to business conditions are no excuse for violating the law. Seek advice from your supervisor or other appropriate person if you have any questions about whether you are in compliance with applicable laws and regulations.

2. Conflicts of Interest

A conflict of interest exists when a person's private interests interfere with the Company's interests. For example, a conflict of interest may arise when an employee takes an action or has an interest that could make it difficult for him to perform his job for the Company effectively and objectively. A conflict of interest may also arise when an employee or a member of his or her family, receives an improper personal benefit as a result of his or her position with the Company. There is usually a conflict of interest when a Company employee also works for a competitor, supplier or Consumer. To avoid such conflicts, employees are prohibited from working for or serving as a director of any of our competitors or Consumers. You should try to avoid any business connection, whether direct or indirect, with our competitors and Consumers unless such connection is made on the Company's behalf. The offer or acceptance of entertainment or gifts in a business setting may also result in a conflict of interest, regardless of good intentions. Company employees and their family members should not accept any gift or entertainment in a business context unless (1) it is not a cash gift, (2) it is not excessive in value, (3) it is consistent with customary business practices, (4) it cannot be construed as a bribe or payoff and (5) it does not violate any laws or regulations. Furthermore, Company employees should not offer any gift or entertainment in the business context if it could be construed as a bribe or payoff, or if it is in violation of any laws or regulations. If you are uncertain whether a gift or entertainment is appropriate, discuss it with your supervisor. It is our policy that conflicts of interest are prohibited unless approved by Traditions Title & Escrow, LLC, Company Administrator.

3. Corporate Opportunities

Employees owe a duty to the Company to act in its best interests and advance its legitimate interests when the opportunity arises. Employees may not take for themselves opportunities they discover through the use of Company information, property or position without the prior consent of Traditions Title & Escrow, LLC. Employees may not compete with the Company, directly or indirectly, and they may not use Company property, information or position to obtain an improper personal gain.

4. Competition and Fair Dealing

We seek to outperform our competitors and build long term relationships with our Consumers through honesty, integrity and superior performance. All of our advertising and marketing materials are truthful and accurate. Deliberately misleading statements, false claims and the omission of material facts by our employees are unacceptable.

We only obtain business legally and ethically. Bribes and kickbacks are not acceptable. Our employees may not use illegal or unethical means of obtaining information about our competitors. Stealing proprietary information, possessing trade secrets that were obtained without the owner's consent, and inducing former or current employees of our competitors to make such disclosures is strictly prohibited. To maintain our reputation, compliance with this policy is essential. If you believe that you may have obtained confidential information or trade secrets of another Company by mistake, or have any questions about the legality of methods of marketing or obtaining information, you should discuss the situation with your supervisor immediately.

5. Discrimination and Harassment

The Company is committed to providing equal opportunity in all aspects of employment. Employment decisions are based on business reasons, such as talent, qualifications and achievements, and will comply with local and national employment laws. Our employees are expected to treat each other with respect and fairness at all times.

6. Health and Safety

The Company strives to provide you with a safe and healthful working environment and asks that you help maintain this environment by following safety and health rules and practices. You should immediately report accidents, injuries, and unsafe equipment, practices or conditions to a supervisor. Violence and threatening behavior are not permitted. In order to protect the safety of our employees, Consumers and guests, every employee is expected to report to work in condition to perform their duties and free from the influence of illegal drugs or alcohol. The use of illegal drugs and alcohol in the workplace will not be tolerated.

7. Accounting and Public Financial Reporting

Employees will act honestly and ethically. The Company requires honest and accurate record-keeping and information reporting in order to make responsible business decisions. All financial records and accounts must accurately reflect all transactions and events and conform to applicable accounting principles and the Company's system of internal controls. No false or artificial entries may be made and all payments made may be used only for the purpose indicated in the supporting documentation. Many employees regularly use expense accounts and Company credit cards. These must be documented and recorded accurately. If you are not sure whether an expense is legitimate, ask your supervisor or the Accounting Department. All business records and communications should be clear, truthful and accurate. Business records and communications often become public; therefore, you should avoid exaggeration, colorful language, guesswork and derogatory remarks or characterizations of people and companies. This applies to all internal or external communications, including email, internal memos, formal reports and telephone communications. Records should always be retained or destroyed according to the Company's record retention policies. Personnel with accounting or financial reporting responsibilities bear a special responsibility in this respect. Employees are prohibited from taking any action to mislead, fraudulently influence, manipulate or coerce any outside auditor or accountant engaged in the performance of an audit required by laws or regulations. Types of conduct that could constitute improper influence include, directly or indirectly:

- intentionally providing an auditor or accountant with materially inaccurate or misleading statements or analysis;
- intentionally failing to provide any material fact in connection with the conduct of any audit, review, or communications required by laws and regulations;
- influencing an outside auditor or accountant to issue or reissue a report on the Company's or its insurance Company subsidiaries' financial statements that is not warranted in the circumstances, due to material violations of statutory accounting principles, generally accepted auditing standards or other professional regulatory standards;
- influencing an outside auditor not to perform an audit, review or other procedures required by generally accepted auditing standards or other professional standards;
- improperly influencing an outside auditor or accountant to withdraw an issued report; or
- influencing an outside auditor or accountant not to communicate appropriate matters to the Audit Committee of the Company.

8. Confidentiality

Employees may not disclose the Company's confidential information except to another person with a legitimate business need to know or except as required by applicable laws and regulations. Confidential information includes, but is not limited to, business, marketing and service plans, engineering ideas, designs, databases, records, salary information, unpublished financial data and reports, and intellectual property such as trade secrets, patents, trademarks and copyrights. We must protect confidential Consumer and supplier information as carefully as we protect our own by marking confidential information as such, keeping the information secure, and limiting access to those who need to know in order to do their jobs. The obligation to protect confidential information continues even after your employment with the Company has ended.

9. Protection and Use of Company Assets

Employees have a responsibility to protect the Company's assets from theft, carelessness and waste, as these have a direct negative impact on the Company's profitability. Company equipment should not be used for non-Company business, although incidental personal use is permitted. Any suspected incident of theft or fraud should immediately be reported to a supervisor for investigation.

10. Communications with or Payments to Government Personnel or Agencies

All communications made by the Company's employees to government officials must be truthful. Employees interacting with officials should deal strictly with facts. When dealing with governments in any capacity, we must take special care to comply with all legal and contractual obligations. The U.S. Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to any foreign government official or political candidate in order to obtain or retain business. Furthermore, this Act prohibits anyone from making illegal payments to government officials of any country.

11. Waivers or Amendments

Only Traditions Title & Escrow, LLC administrator may waive the application of any part of this Code to an employee or approve an amendment to this Code.

12. Reporting Violations of the Code

Persons covered by this Code must promptly report any violation or potential violation of this Code, including observed illegal or unethical behavior. If you are in doubt as to whether a violation has occurred or about the best course of action, we encourage you to talk to a supervisor. Reports of violations or potential violations of this Code with respect to questionable accounting, auditing, financial reporting or any other violations should be reported to Traditions Title & Escrow, LLC Administrator for investigation. We would prefer you identify yourself to facilitate our investigation of any report. However, you may choose to remain anonymous. If you identify yourself to the recipient of your report, but request that your identity be kept confidential, we will use reasonable efforts to protect your identity. The Company does not permit or tolerate any kind of retaliation against employees, who make good faith reports of violations of this Code.

The Company will not discharge, demote, suspend, threaten, harass, or in any other manner discriminate against any employee for providing information, causing information to be provided, or otherwise assisting in an investigation of any conduct that such person reasonably and in good faith believes constitutes a violation of this Code. Any acts of retaliation against an employee who reports what the employee reasonably believes to be a violation of the Code will be treated by the Company as a serious violation of this Code and could result in dismissal by the Company and/or criminal or civil sanctions. We will also use reasonable efforts to protect the identity of the person about or against whom an allegation is brought, unless and until it is determined that a violation has occurred. Any person involved in any investigation in any capacity of possible misconduct must not discuss or disclose any information to anyone outside of the investigation unless required by law or when seeking his own legal advice, and is expected to cooperate fully in any investigation.

Any use of these reporting procedures in bad faith or in a false or frivolous manner will be considered a violation of this Code. Further, you should not use the Company's reporting procedures for personal grievances or other matters not involving this Code. Persons covered by this Code are expected to cooperate fully in the Company's investigation of complaints.

13. Compliance Procedures

In some situations, it is difficult to know whether the Code is being or will be violated. Since we cannot anticipate every situation that may arise and address it in this Code, the following guidelines will assist you in evaluating whether the Code is being or will be violated: Make sure you have all of the facts. You should be as fully informed as possible in order to make the right decision. Ask yourself whether what you are being asked to do seems unethical or improper. This will enable you to focus on the issue you are facing and the alternatives that are available to you. Remember to use your common sense. If something seems to be unethical or improper, it probably is. Clarify your role and responsibility. In many situations, there is shared responsibility. If your coworkers are informed about the situation, it may be helpful to discuss it with them. Discuss the situation with your supervisor. Often, your supervisor will be more knowledgeable about the issue and will appreciate being brought into the decision-making process. Keep in mind that it is your supervisor's job to help solve problems. If you do not feel comfortable speaking to your supervisor, talk to another member of management. Ask first and act later. If you are unsure of what to do in a certain situation, always seek guidance before you take action. Report violations in confidence and without fear of retaliation. If a situation requires that your identity be kept a secret, your anonymity will be protected. The Company does not permit or tolerate any kind of retaliation against employees for good faith reports of illegal activities or ethical violations by others.

**ACKNOWLEDGEMENT OF CODE
OF BUSINESS CONDUCT AND ETHICS**

This Code of Business Conduct and Ethics covers a wide range of business practices and procedures. It does not address every situation that may arise, but it sets forth basic principles to guide you. We expect all employees of Traditions Title & Escrow, LLC “Company” to conduct themselves according to this Code and to seek to avoid even the appearance of improper behavior.

All employees of the Company are required to certify that they have read and understand the Code of Business Conduct and Ethics within one week of their hire date and on an annual basis thereafter.

By signing below you acknowledge that as of today’s date you are not aware of any violations of the Code of Business Conduct and Ethics, including possible violations of federal securities laws that have not already been reported to the Company.

I certify that I have read and understand the Code of Business Conduct and Ethics.

Employee Signature

Name (Please print)

Location

Date

Received by Human Resources:

Name

Date