

ALTA Best Practice Framework

The ALTA Best Practices Framework has been developed to assist lenders in satisfying their responsibility to manage third party vendors. The ALTA Best Practices Framework is comprised of the following documentation needed by a company electing to implement such a program.



ALTA Mission Statement

ALTA seeks to guide its membership on best practices to protect consumers, promote quality service, provide for ongoing employee training, and meet legal and market requirements. These practices are voluntary and designed to help members illustrate to consumers and clients the industry's professionalism and best practices to help ensure a positive and compliant real estate settlement experience. These best practices are not intended to encompass all aspects of title or settlement company activity.

ALTA is publishing these best practices for the mortgage lending and real estate settlement industry. ALTA accepts comments from stakeholders as the Association seeks to continually improve these best practices. A formal committee of ALTA members regularly reviews and makes improvements to these best practices, seeking comment on each revision.

eTitle Insurance Agency supports ALTA's Mission Statement and our insurance and settlement services are provided in accordance with these standards.

1. Best Practice: 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.

eTitle Insurance Agency procedures to meet this best practice:

- We will establish and maintain applicable Business Licenses (see attached [Exhibit A](#)).
- We will establish and maintain compliance, with licensing, registration, and other State of Utah Insurance Department laws/rules, by keeping a licensing checklist, including type of employee license/s, location, continuing education and appointments (see attached [Exhibit B](#)).
- We will Review the licensee checklist, on a monthly basis, for compliance, expiration dates and removal of former or inactive employees.
- We will establish and maintain appropriate compliance with ALTA's Policy Forms Licensing requirement.

2. Best Practice: 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.

eTitle Insurance Agency procedures to meet this best practice:

- Escrow funds and operating accounts are separately maintained.
 - Our Escrow Officers and Assistants will restrictively endorse the back of every check, write our file no. on the front of check, will not deposit Earnest Money checks until we have a file no. and type our file no. online when sending wires to ensure that all escrow funds, or other funds, the Company maintains, under a fiduciary duty, are not commingled with the Company's operating account, employee or manager expense account.
- Escrow Trust Accounts will be prepared with Trial Balances.
 - We will apply every credit and debit to a file number to ensure our Escrow Trust Accounts can be prepared with Trial Balances ("Three-Way Reconciliation"), on at least a monthly basis. The Trial Balance reflects all open escrow balances.
- Escrow Trust Accounts will be reconciled.
 - On at least a daily basis, we will reconcile receipts and disbursements of the Escrow Trust Account.
 - On at least a monthly basis, we will perform a Three-way reconciliation of the bank statement, check book and Trial Balances.
 - We will segregate duties to ensure reconciliations are conducted by someone other than those with signing authority.
 - Management will review results of the reconciliation and allow electronic access by the Company's contracted underwriter(s).
- Escrow Trust Accounts will be properly identified.
 - Accounts will be identified as "escrow" or "trust" accounts. We will request that the bank place the appropriate identification on all account-related documentation including bank statements, bank agreements, disbursement checks and deposit tickets.
- Outstanding file balances will be documented and reconciled.
- Transactions will be conducted by authorized employees only.
 - Only those employees whose authority has been defined to authorize bank transactions may do so. Appropriate authorization levels are set by the Company and reviewed for updates annually. Former employees are immediately deleted as listed signatories on all bank accounts.
- Unless directed by the beneficial owner, Escrow Trust Accounts will be maintained in Federally Insured Financial Institutions.
- We will Utilize Positive Pay or Reverse Positive Pay, Automated Clearing House blocks and international wire blocks, if available.
 - PeopleTrail or other appropriate third party will provide our background checks.
 - We will explain Positive Pay to clients who take our check to their bank and want cash.
 - Background Checks will be completed in the hiring process. At least every three years, we will obtain Background Checks, going back five years, for all employees who have access to customer funds.
- Ongoing training will be conducted for employees in management of escrow funds and escrow accounting.

3. Best Practice: 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 customer 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.

eTitle Insurance Agency procedures to meet this best practice:

- Physical security of Non-public Personal Information.
 - We will restrict access to Non-public Personal Information to authorized employees who have undergone Background Checks at hiring (People Trail provides our background checks).
 - We will employ a clean-desk policy. Employees will utilize locking filing cabinets, safes and desks. Customers/clients will not be left alone in our offices.
 - We will prohibit or control the use of removable media (**USB drives, CD/DVD, SD cards can only be used on our public use group of computers/closing room computers**).
 - We will use secure delivery methods when transmitting Non-public Personal Information. E-mails attachments will be password protected using our custom electronic file storage system.
- Network security of Non-public Personal Information.
 - We will maintain secure access to Company information technology.
 - Employees will follow company computer use policies as outlined on Pages 17 & 18 in the employee manual (see attached [Exhibit C](#)).
 - Employees will not share computer passwords.
 - We have and will continue to develop guidelines for the appropriate use of Company information technology.
 - We will ensure secure collection and transmission of Non-public Personal Information.
- Disposal of Non-public Personal Information.
 - We will follow Federal law that requires companies that possess Non-public Personal Information for a business purpose, to dispose of such information properly in a manner that protects against unauthorized access to or use of the information.
 - We will place paper in Certified Shredding bins, every night, and continue to retain. Certified Shredding Inc. or other, licensed and bonded, document Destruction Company, to empty Recycle bins.
 - Employees will follow company privacy policies as outlined on page 23 in the employee manual (see attached [Exhibit D](#)). Generally, we do not keep copies of credit reports, loan applications and tax returns. However, we will read and follow, Lender Instructions on each closing.
- Establish a disaster management plan. Our plan includes:
 - Maintain a backup set of company data, and computer systems, at our Riverwoods branch office (33 miles south of our Fashion Place, primary, office).
 - Re-route the data connection, for all offices, to the Riverwoods Office.
 - Distribute employees among each functioning office.
 - Goal of 70% normal operations.
- Appropriate management and training of employees to help ensure compliance with Company's information security program.
 - Our employees will read and understand computer use and privacy policies.
 - We will review ALTA Best Practices and information security program at semi-annual, in-house, company sponsored Continuing Education Seminars.
- Oversight of service providers to help ensure compliance with a Company's information security program.
 - We will take reasonable steps to select and retain service providers that are capable of appropriately safeguarding Non-public Personal Information.
 - We will ask our Service Providers to agree to our privacy and information security programs.
- Audit and oversight procedures to help ensure compliance with Company's information security program.
 - We will have semi-annual reviews of privacy and information security procedures to detect the potential for improper disclosure of confidential information.
- Notification of security breaches to customers and law enforcement.
 - We will post our privacy and information security program on company websites. We will also provide program information directly to customers in other useable forms as requested.
 - When a breach is detected, employees will immediately inform management and the company will immediately inform customers and law enforcement as required by law.
 - Ben Franklin taught, "An ounce of prevention is worth a pound of cure."

4. Best Practice: 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.

eTitle Insurance Agency procedures to meet this best practice:

- Recording procedures.
 - We will maintain our duty as an objective third-party fiduciary and review legal and contractual requirements/instructions to determine Company obligations to record documents. We will incorporate such requirements/instructions with our recording instructions checklist.
 - We will follow our in-house recording instruction checklist (see attached [Exhibit E](#))
 - We will submit or ship documents for recording to the county recorder (or equivalent) or the person or entity responsible for recording within two (2) business days or the later of (i) the date of Settlement, or (ii) receipt by the Company if the Settlement is not performed by the Company.
 - We will track shipments of documents for recording.
 - We will ensure timely responses to recording rejections.
 - We will follow up on rejected recordings to prevent unnecessary delay.
 - We will verify that recordation actually occurred and maintain a record of the recording information for the document(s).
 - We will save a copy of all recorded documents in our electronic file system.
- Pricing procedures.
 - We will maintain written procedures to help ensure that customers are charged the appropriate/applicable title insurance premium and other rates, including our filed escrow fees, for services provided by the Company. These premiums and rates are determined by a mix of legal and contractual obligations.
 - We will utilize rate manuals and, our, online calculators, as appropriate, to help ensure correct fees are being charged for title insurance policy premiums, state-specific fees and endorsements.
 - We will avoid junk fees and use our “best efforts” to charge a single, bundled settlement/closing fee.
 - We will ensure discounted rates are calculated and charged when appropriate, including refinance or reissue rates.
 - We will review 1200 section on HUD for RESPA compliance recording amounts (\$14.00 for Deed and \$40.00 for Deed of Trust).
 - We will keep a written log to account for escrow charges above our minimum filed fees.
 - Before closing, check to make sure we are using the correct underwriter, policy and charges.
 - We will quality check files after Settlement to help ensure consumers were issued the appropriate policy and charged our filed fees.
 - We will provide timely refunds to consumers when an overpayment is detected.
 - We will store your closed files in our electronic file system

5. Best Practice: 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.

eTitle Insurance Agency is an issuing agent for First American Title and Fidelity National Title and maintains the following procedures to meet this best practice:

- Title policy production and delivery.
 - We will issue and deliver title policies, within 30 days of the later of (i) the date of Settlement, or (ii) the date the terms and conditions of title insurance commitment are satisfied and will meet statutory, regulatory or contractual obligations.
 - We will upload First American policy copies to First American Title Agent Net website.
 - eTitle Insurance Agency will keep Fidelity National Title policy copies.

- We will provide complete and accurate information in your recording package and recording checklist (see attached [Exhibit E](#))
- We will resolve post-closing issues within 30 days of closing.
- Premium reporting and remittance.
 - We will report any premiums from title insurance policies to the underwriter in a timely manner and meet statutory, regulatory or contractual obligations.
 - We will report policies (including a copy of the policy) to underwriter by the last day of the month following the month in which the insured transaction was settled.
 - We will remit premiums to underwriter by the last day of the month following the month in which the insured transaction was settled.

6. Best Practice: 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.

eTitle Insurance Agency procedures to meet this best practice:

- We will maintain and comply with all requirements for professional liability insurance/errors and omissions insurance and fidelity coverage as directed by Utah State law and Underwriting Requirements.
- We will maintain copies of our insurance policies, as part of our Lender Approval Packet, on the home page of our web site. (click here for a copy of the [Lender Approval Packet](#))

7. Best Practice: 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.

eTitle Insurance Agency procedures to meet this best practice:

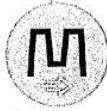
- Consumer complaint intake documentation and tracking.
 - Customers may contact the office, escrow, title officer or employee with whom they have transacted business or been in contact. Customers are also welcome to contact Canyon Anderson, Vice President, at (801) 288-8818 or canderson@backmantitle.com
 - Upon receipt of a verbal or written complaint:
 - 1) Employees go to our web site / contact us / complaint resolution and enter a summary of the complaint into our web form.
 - 2) An entry is created in the Complaint Log for tracking purposes.
 - 3) An e-mail is sent to Canyon Anderson (single point of contact) and a Complaint Reference ID Number is assigned.
 - 4) Employees talk to their manager/supervisor for determination on who will be responsible for response and resolution.
 - 5) Email notifications are sent to the client to notify them of status changes and resolution of the complaint.

EXHIBIT A – Business Licenses

MUST BE POSTED IN A CONSPICUOUS PLACE

17 0014488

Amount Paid \$: 124.00



Murray City Corporation
4646 South 500 West, Murray, UT 84123

Account #: 0014488

Date Issue: 04/12/16

Expires: 04/30/17

BUSINESS LICENSE

**ETITLE INSURANCE AGENCY, LLC
IS AUTHORIZED TO CONDUCT BUSINESS**

AS: INSURANCE AGENTS, BROKERS & SERVICE

AT: 167 E 6100 S.

David Ted Eyre

Mayor
Jennifer Kennedy

Recorder

EMPLOYEES: 4

Licenses are non-transferable from neither location nor ownership and are valid only as shown above.

Notice: this certificate must be posted in a conspicuous place

SALT LAKE CITY CORPORATION

CITY I.D. Number LIC2014-04237

(531390)

This is to certify that the herein-name, having complied with the ordinance in force, related to licenses, is hereby licensed to transact the business of:

Agents' offices, real estate escrow

Commencing Nov 01, 2016
and Ending Oct 31, 2017

COMMERCIAL LICENSE 1
MISC SERVICES 1

Within Salt Lake City, Utah at the address indicated below:

eTITLE INSURANCE AGENCY
170 S MAIN St #135
Salt Lake City, UT 84101-1605

In Testimony Whereof, I have hereunto set my hand:



Attest:

Erin Mansell

Jacqueline M. Bishop

This License is Not Transferable

| | | |
|---|--|---|
| <p>NOTICE: THIS LICENSE MUST BE POSTED IN A CONSPICUOUS PLACE.</p> | <p>CITY OF SOUTH SALT LAKE 220 E Morris Ave South Salt Lake, UT 84115</p> | <p>LICENSE NO.: 003882 DATE ISSUED: 12/15/2015</p> |
| <p>BUSINESS LICENSE</p> <p>The below named person or firm is hereby granted a license to do business in South Salt Lake, Utah, subject to provisions of City Codes, and applicable state or federal regulations.</p> | | |
| <p>NAME: ETITLE INSURANCE AGENCY LLC TO: LUNDBERG & ASSOCIATES 3269 S MAIN ST # 100 South Salt Lake UT 84115</p> | <p>EXPIRATION DATE: 12/31/2016</p> <p>DBA: OWNER: LUNDBERG & ASSOCIATES BUSINESS LOCATION: 3269 S MAIN ST #100 BUSINESS DESCRIPTION: TITLE INSURANCE AND ESCROW CLOSINGS</p> | <p><i>Julie Taylor</i> Business License Officer</p> |
| <p>THIS LICENSE IS NOT TRANSFERABLE</p> | | |

| | | |
|---|--|---|
| <p>NOTICE: THIS LICENSE MUST BE POSTED IN A CONSPICUOUS PLACE.</p> | <p>CITY OF ST. GEORGE 175 E 200 N ST. GEORGE, UT 84770</p> | <p>LICENSE NO.: 00035220 DATE ISSUED: 1/01/2016 EXPIRES: 12/31/2016</p> |
| <p>BUSINESS LICENSE</p> <p>THIS CERTIFIES that the business or individual listed below is hereby granted a license to do business as stated at the specified business location for the year indicated on this certificate.</p> | | |
| <p>NAME: ETITLE INSURANCE AGENCY LLC TO: 382 S BLUFF STE 100 SAINT GEORGE UT 84770</p> | <p>LICENSE YEAR: 2016</p> <p>BUSINESS OWNER: CANYON ANDERSON BUSINESS LOCATION: 382 S BLUFF ST #100 TYPE OF BUSINESS: TITLE & ESCROW COMPAN</p> | <p><i>[Signature]</i> CITY LICENSE OFFICER</p> |
| <p>THIS LICENSE IS NOT TRANSFERABLE BETWEEN OWNERS AND/OR LOCATIONS</p> | | |

EXHIBIT B –Licensing Checklist

| <u>Agent Name</u> | <u>Office Location</u> | <u>License</u> | <u>Active Date</u> | <u>Expiration</u> | <u>CE Compliance</u> | <u>Type of License</u> | <u>Appointed</u> |
|------------------------|------------------------|----------------|--------------------|-------------------|----------------------|------------------------|------------------|
| Andrea J Howell | Murray | 240885 | 5/4/2006 | 8/31/2018 | Compliant | Marketing | Yes |
| Canyon Walker Anderson | Murray | 60688 | 8/10/2000 | 5/31/2018 | Compliant | Title | Yes |
| David W Johnson | St George | 77942 | 3/26/2014 | 6/30/2017 | Compliant | Title & Escrow | Yes |
| Diane C Green | Murray | 57289 | 8/1/2005 | 12/31/2016 | Compliant | Title | Yes |
| H Lane Tait | St George | 73874 | 11/7/2008 | 1/31/2018 | Compliant | Title & Escrow | Yes |
| J Scott Lundberg | South Salt Lake | 76849 | 10/22/1997 | 6/30/2017 | Compliant | Title & Escrow | Yes |
| Jason Canyon Anderson | Murray | 403440 | 2/22/2012 | 6/30/2018 | Compliant | Title | Yes |
| Jim Crockatt | Murray | 68097 | 10/16/1989 | 8/31/2018 | Compliant | Escrow | Yes |
| John H Smith | Downtown | 220479 | 5/4/2006 | 6/30/2017 | Compliant | Marketing | Yes |
| Kevin B Merrill | Layton | 52819 | 8/19/2011 | 7/31/2017 | Compliant | Title | Yes |
| Lorena D Osborn | Murray | 83757 | 12/14/1994 | 4/30/2017 | Compliant | Title & Escrow | Yes |
| Paul D Newton | Murray | 295 | 11/3/1992 | 9/30/2018 | Compliant | Title & Escrow | Yes |
| Ron E Brown | Murray | 89255 | 8/10/2000 | 4/30/2018 | Compliant | Title | Yes |
| Ronda Williamson | Murray | 82461 | 5/10/2004 | 2/28/2017 | Compliant | Escrow | Yes |
| Spring A Johnson | St George | 91624 | 3/26/2014 | 1/31/2017 | Compliant | Escrow | Yes |
| Tiffany A Tripp | Murray | 249390 | 7/7/2008 | 12/31/2016 | Compliant | Title & Escrow | Yes |
| Tina M Perkins | Murray | 52897 | 7/28/1989 | 10/31/2016 | Compliant | Title | Yes |
| William R Feveryear | Provo | 85029 | 5/8/1996 | 1/31/2018 | Compliant | Title & Escrow | Yes |

EXHIBIT C – Pages 17 & 18 of the Employee Manual

4. You apply for and are available for re-employment within ninety (90) days after discharge from active duty. If you are returning from up to six (6) months of active duty for training, you must apply within thirty (30) days after discharge.

Military Reserves or National Guard Leave of Absence

Employees who serve in U. S. military organizations or state militia groups may take the necessary time off without pay to fulfill this obligation, and will retain all of their legal rights for continued employment under existing laws. These employees may apply accrued PTO time to the leave if they wish, however, they are not obliged to do so.

You are expected to notify your (manager / supervisor / team leader / designated company representative) as soon as you are aware of the dates you will be on duty so that arrangements can be made for replacement during this absence.

Insurance Premium Payment During Leaves of Absence

eTitle Insurance Agency will continue to pay its share of insurance premiums for employee coverage and dependent coverage for a maximum of twelve weeks (12) while you are on a FMLA or Specific Short Term Disability leave of absence. While you are on any other type of unpaid leave of absence from eTitle Insurance Agency, you will be responsible for paying the total premiums for your coverage and that of your dependents. Failure to do so may result in loss of coverage and possible refusal by the insurance carrier to allow your coverage to be reinstated. Please contact the human resource department with questions about how to pay the health insurance premium.

Workplace Policies

This Employee Manual is designed to answer many of your questions about the practices and policies of eTitle Insurance Agency. Feel free to consult with your (manager / supervisor / team leader / designated company representative) for help concerning anything you don't understand.

Company and Department Meetings

On occasion, we may request that you attend a company-sponsored meeting. If this is scheduled during your regular working hours, your attendance is required. If you are a non-exempt employee, and attend a meeting held during your non-working hours, you will be paid for the time you spend traveling to and from the meeting as well as for time spent at the meeting.

Computer Software (Unauthorized Copying)

eTitle Insurance Agency does not condone the illegal duplication of software. The copyright law is clear. The copyright holder is given certain exclusive rights, including the right to make and distribute copies. Title 17 of the U.S. Code states that "it is illegal to make or distribute copies of copyrighted material without authorization" (Section 106). The only exception is the users' right to make a backup copy for archival purposes (Section 117).

Computers, Electronic Mail, Internet, and Voice Mail Usage

eTitle Insurance Agency makes every effort to provide the best available technology to those performing services for eTitle Insurance Agency. In this regard, eTitle Insurance Agency has installed, at substantial expense, equipment such as computers, electronic mail, and voice mail. This policy is to advise those who use our business equipment on the subject of access to and disclosure of computer-stored information, voice mail messages and electronic mail messages created, sent or received by eTitle Insurance Agency's employees with the use of eTitle Insurance Agency's equipment.

This policy also sets forth policies on the proper use of the computer, voice mail, Internet, and electronic mail system and the Internets provided by eTitle Insurance Agency.

eTitle Insurance Agency property, including computers, electronic mail and voice mail, should only be used for conducting company business.

The use of the electronic mail system and the Internet may not be used to solicit for commercial ventures, religious or political causes, outside organizations, or other non-job related solicitations. Furthermore, the electronic mail system and the Internet are not to be used to create any offensive or disruptive messages. Among those which are considered offensive, are any messages which contain sexual implications, racial slurs, gender-specific comments, or any other comments that offensively address someone's age, sexual orientation, religious or political beliefs, national origin, or disability. In addition, the electronic mail system and the Internet shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials without prior authorization.

Although eTitle Insurance Agency provides certain codes to restrict access to computers, voice mail and electronic mail to protect these systems against external parties or entities obtaining unauthorized access, employees should understand that these systems are intended for business use, and all computer information, voice mail and electronic mail messages are to be considered as company records and not private or confidential.

eTitle Insurance Agency also needs to be able to respond to proper requests resulting from legal proceedings that call for electronically stored evidence. Therefore, eTitle Insurance Agency must, and does, maintain the right and the ability to enter into any of these systems and to inspect and review any and all data recorded in those systems. Because eTitle Insurance Agency reserves the right to obtain access to all voice mail and electronic mail messages left on or transmitted over these systems, employees should not assume that such messages are private and confidential or that eTitle Insurance Agency or its designated representatives will not have a need to access and review this information. Individuals using eTitle Insurance Agency's business equipment should also have no expectation that any information stored on their computer - whether the information is contained on a computer hard drive, computer disks or in any other manner - will be private.

eTitle Insurance Agency has the right to, but does not regularly monitor voice mail, Internet usage or electronic mail messages. eTitle Insurance Agency will, however, inspect the contents of computers, voice mail or electronic mail in the course of an investigation triggered by indications of unacceptable behavior or as necessary to locate needed information that is not more readily available by some other less intrusive means.

The contents of computers, voice mail, and electronic mail, properly obtained for some legitimate business purpose, may be disclosed by eTitle Insurance Agency if necessary within or outside of eTitle Insurance Agency

eTitle Insurance Agency's President will review any request for access to the contents of an individual's computer, voice mail, or electronic mail prior to access being made without the individual's consent.

Any employee who violates this policy or uses the electronic communication systems for improper purposes may be subject to discipline, up to and including termination.

Social Media

At eTitle Insurance Agency, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media. This policy applies to all associates who work for eTitle Insurance Agency, or one of its subsidiary companies in the United States.

In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with eTitle Insurance Agency, as well as any other form of electronic communication.

The same principles and guidelines found in eTitle Insurance Agency policies and three basic beliefs apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow associates or otherwise adversely affects members, customers, suppliers,

EXHIBIT D – Page 23 of the Employee Manual

Reporting

While eTitle Insurance Agency encourages you to communicate directly with the alleged harasser, and make it clear that the harasser's behavior is unacceptable, offensive or inappropriate, it is not required that you do so. It is essential, however, to notify your (supervisor / manager / team leader / designated company representative) immediately even if you are not sure the offending behavior is considered harassment. Any incidents of harassment must be immediately reported to a manager or other management representative. Appropriate investigation and disciplinary action will be taken. All reports will be promptly investigated with due regard for the privacy of everyone involved. However, confidentiality cannot be guaranteed. Any employee found to have harassed a fellow employee or subordinate will be subject to severe disciplinary action up to and including termination. eTitle Insurance Agency will also take any additional action necessary to appropriately remedy the situation. Retaliation of any sort will not be permitted. No adverse employment action will be taken for any employee making a good faith report of alleged harassment.

Liability

eTitle Insurance Agency accepts no liability for harassment of one employee by another employee. The individual who makes unwelcome advances, threatens or in any way harasses another employee is personally liable for such actions and their consequences. eTitle Insurance Agency may or may not provide legal, financial or any other assistance to an individual accused of harassment if a legal complaint is filed.

Statement of Privacy Policy

Title V of the Gramm-Leach-Bliley Act (GLBA) generally prohibits any financial institution, directly or through its affiliates, from sharing nonpublic personal information about a consumer with a nonaffiliated third party unless the institution provides the consumer with a notice of its privacy policies and practices, such as the type of information that it collects about the consumer and the categories of persons or entities to whom it may be disclosed.

1. In compliance with the GLBA, we do not share nonpublic personal information about a consumer with a nonaffiliated third party, unless allowed by law and / or agreed to by the customer.
2. In compliance with the GLBA, our privacy practices regarding nonpublic personal financial information of consumers and customers (as defined by GLBA) are as follows, subject to any exceptions as permitted by law and / or agreed to by the customer.
3. We protect nonpublic personal information of customers and consumers.
4. We allow access on need to know basis only. Only title company personnel who need to know can access the information. Examples may include bookkeepers, title examiners, title underwriter personnel, auditors, closers and their assistants, management, scanning personnel, and claims related investigation personnel, including but not limited to retained counsel.
5. We allow customers and consumers to review their nonpublic personal information that we have collected, and we allow them to provide us with requests for amendment or deletion of such information, to which we will reasonably respond.
6. We require consent from a proper party to the transaction to provide nonpublic personal information relating to that transaction. On closed files, we require a written agreement by a party.
7. We have implemented a security procedure for protection of nonpublic personal information: we allow only authorized personnel to review the information, and we keep closed files in secure storage, with limited access, or we store the files on computer with limited password access.
8. We generally do not keep copies of credit reports, loan applications, and tax returns on consumers and customers.
9. We don't share copies of owner's policies of customers on residential transactions, unless at the request or by agreement of the insured owner.
10. If we share starter title information, clearing or payoff information, we don't share nonpublic personal information, such as sales price (unless it is public information), or social security numbers shown on affidavits of identity.
11. We periodically inform our personnel about our policy.
12. We don't share nonpublic personal information with independent contractors, unless there is a need to process the transaction as allowed by law, and the contractors agree in writing not to further share the information.

EXHIBIT E – Recording Instruction Checklist

**eTITLE INSURANCE AGENCY L.L.C.
RECORDING CHECK LIST**

| | |
|------------------------------|----------------------------|
| Order No. _____ | County: _____ |
| Borrower: _____ | Date to Record: _____ |
| When Recorded Call: _____ | Phone: _____ |
| Hold for Escrow OK _____ | OK to Record: _____ |
| SPLIT CLOSING: YES NO: _____ | Other Title Company: _____ |
| Contact Person: _____ | Phone Number: _____ |
| Their Order Number: _____ | RESPA _____ |

| DOC TYPE | FROM | TO | TIME | ENTRY | BOOK | PAGE |
|----------|------|----|------|-------|------|------|
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| | | |
|--|--------|----------|
| ESCROW RECORDING CHECK LIST, INITIAL EACH BLANK SEPARATELY | Escrow | Recorder |
| 1. Documents are in the proper recording order | _____ | _____ |
| 2. Judgments have been checked for trustors, grantors and grantees | _____ | _____ |
| 3. Trustors', Grantors' & Grantees' names are concurrent with commitment | _____ | _____ |
| 4. Documents have the correct legal description attached | _____ | _____ |
| 5. Valid Trustee on Trust Deed | _____ | _____ |
| 6. Documents are signed correctly | _____ | _____ |
| 7. Acknowledgements & Notary seals are complete, dated and correct | _____ | _____ |
| 8. All Riders attached to Trust Deed | _____ | _____ |
| 9. All requirements have been cleared and written evidence is attached (underwriter approval, home equity letters, payoff checks, etc.) | _____ | _____ |
| 10. If a split closing, include copies of Huds, docs, instructions & clearing info | _____ | _____ |
| 11. Include applicable closing instructions (Lender's instructions, etc.) | _____ | _____ |
| 12. A working copy of the commitment (policy write up) is attached | _____ | _____ |
| 13. Return addresses of beneficiaries & grantees are correct on docs | _____ | _____ |
| 14. Does Customer need to be billed for title work Yes No | _____ | _____ |

| ITEM | AMOUNT | CHARGES |
|---------------------------------|--------|---------|
| Owners Policy Eagle: | \$ | \$ |
| Lenders Policy | \$ | \$ |
| Endorsements (9, 116, 8.1, arm) | | \$ |
| Endorsements Misc.: | | \$ |
| Recording fees | | \$ |
| Reconveyance fee | | \$ |
| Miscellaneous fees: | | \$ |
| Miscellaneous fees: | | \$ |

SPECIAL INSTRUCTIONS AND RECORDER NOTATIONS:
