

## ALTA BEST PRACTICES POLICY

### OUR PLEDGE

At JetClosing, we are proud to announce we have established the “Title Insurance and Settlement Company Best Practices” according to the recent suggestions and guidance provided for by the American Land Title Association (ALTA). ALTA created these Best Practices to help its members highlight policies and procedures the title insurance industry exercises to protect lenders and consumers, while ensuring a positive and compliant real estate settlement experience.

#### We hereby Pledge to continually:

Innovate new business practices and tools to enhance the settlement experience.

Provide ongoing employee training for quality service and regulatory compliance.

Implement written procedures in conformance to these Best Practices on your behalf.

### CONTROL ENVIRONMENT SUMMARY

#### 1 Establish and maintain current License(s) as required to conduct the business of title insurance and settlement services

JetClosing holds all Arizona, Colorado, Nevada and Washington mandated title insurance licenses as a title insurance agency and for requisite individuals dependent upon job responsibilities. Such licenses are reviewed by our underwriters on an annual basis.

JetClosing provides all required corporate governance filings and reports to the states of Arizona, Colorado, Nevada and Washington as a matter of course. We also secure all local business licenses and permits required to do business for all branch locations we maintain.

JetClosing is part of an agreement with ALTA in utilizing all ALTA Forms and affiliated information. JetClosing uses Siron Producer Edge to track and maintain state licensure and continuing education requirements.

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

JetClosing deploys all appropriate and essential procedures and controls related to its Escrow Trust Accounts as required by the states of Arizona, Colorado, Nevada and Washington, the Consumer Financial Protection Bureau, and our underwriters to safeguard your funds. Escrow Controls include, but are not limited to:

- Positive Pay through Wells Fargo Bank.
- Complete separation of escrow responsibilities relating to check signing, wire approvals, and reconciliations.
- Daily two-way reconciliations.
- Monthly three-way reconciliations.

## 3 Adopt and maintain a written privacy and information security program to protect Nonpublic Personal Information as required by local, state, and federal law.

JetClosing maintains an Information Security Policy that comports to federal and state law as well as requirements set forth by our underwriters for holding and securing non-public personal information.

JetClosing has developed a Disaster Management Plan for the company's network, systems, and applications. All transaction data is backed up nightly.

JetClosing retains all NPPI on AWS with state-of-the-art encryption and firewalls designed to protect sensitive materials and provide access only to authorized users.

JetClosing utilizes EchoWorx encrypted email for transmitting non-public personal information.

JetClosing maintains a "Clean Desk" policy for all non-public information stored in its offices.

JetClosing performs employee screening through CheckPoint in the form of background checks in its hiring process and regularly conducts background checks every 3 years. These background checks are available to our underwriters.

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

JetClosing has written procedures that delineate our procedures and checklists (pre-closing and post-closing) for real estate settlements in Arizona, Colorado, Nevada and Washington that adhere to federal, state, and underwriter mandated requirements. All employees are trained and subject to future training on those requirements.

JetClosing provides Pricing Procedures and Controls in the form of underwriter's rate manuals, our production system (ResWare), and/or online calculators to help ensure the correct fees are being charged for title insurance policy premiums, state-specific fees and endorsements as filed with the states of Arizona, Colorado, Nevada and Washington. All credits, discounts, and other pricing accommodations are provided (whenever applicable) pursuant to our underwriter's business rules and filed rates along with our filed settlement fees.

JetClosing administers written Document and Instrument Recording Procedures and Controls for e-recordings, overnight mailers, and desk presentations.

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

JetClosing maintains all requisite procedures for timely issuance of title insurance policies to Owners and Lenders as dictated by federal law, Arizona, Colorado, Nevada and Washington Department of Insurance regulations, and underwriter mandates.

JetClosing also maintains the appropriate systems to timely report issued title insurance policies to our underwriters, remit payment to our underwriters, and overall meet our legal and contractual obligations thereto.

JetClosing tracks transaction status through our production system, which provides a fully auditable file history and reporting capability.

## 6 Maintain appropriate professional liability insurance and fidelity coverage.

JetClosing secures Professional Liability Insurance (Errors and Omission Insurance as an example) that stands by our financial capacity and commitment to provide professional real estate services to our customers. (See attached Exhibit A) Such insurance also includes any mandated coverages called for by our underwriters.

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

JetClosing has developed written procedures to capture, review, and timely address any issues or concerns you may have regarding our services.

JetClosing built consumer complaint reporting as an integrated part of our technology services, providing secure two-way communication between JetClosing and its clients. Complaints are logged, tracked, resolved, and retained in a high-availability system with auditing and reporting capabilities.