Policies and Procedures
Licensing

Purpose	To document mandated insurance licenses and corporate registrations (as applicable) so that **Property Transfer Services Inc.** is able to remain in good standing with each state(s) in which they conduct business.
Scope	These policies and procedures are for all of **Property Transfer Services Inc.** (Hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	**Licensing** The Company maintains active agency (business entity) licenses as well as agent (employee, owner, and producer) licenses. When necessary, the Company also maintains active non-resident state licenses. The following people are licensed in accordance with state specific regulations: • Persons who give rate quotes • Persons who discuss coverage and exceptions • Persons who make underwriting decisions • Persons who sign commitments • Persons who sign policies A tracking report (attached) is maintained by Christine Rafi as a monitoring control and periodically reviewed by owner Michael Rapf to help ensure the appropriate business professionals are licensed and renewed when necessary. Licensed individuals, along with their active licenses, have been communicated to each underwriter. The underwriter is notified when a license becomes inactive. Licensed individuals maintain the necessary continuing education requirements including any necessary ethics requirements. Documentation is maintained to evidence the requirements have been met. The Company maintains and has on file the appropriate American Land Title Association Policy Forms License.

Contact Officer	Christine Rafi
Date Approved	*05/27/2015*
Date of Commencement	*04/04/2015*
Amendment Dates	
Date for Next Review	*09/2015*
Related References and Links	• *License Monitoring Tracking Report' is located in PTS network drive in a folder entitled "Best Practices", sub folder" Licensing"* • *Completed continuing education materials for each licensee are located in PTS network drive in a folder entitled "Best Practice", subfolder "Licensing Education"* • *Copies of the active licenses (agency and agent) are kept in electronic copy on the PTS network drive in a folder entitled "Best Practice", subfolder" License Copies". Hard copies are also kept in Managements files drawer in folders entitled "Employee & Agent Licenses"*

Policies and Procedures
Escrow/Trust Accounting

Purpose	Document escrow/trust internal controls are in place to meet requirements for the safeguarding of client funds and to minimize the exposure to loss of client funds.
Scope	These policies and procedures are for all of **Property Transfer Services Inc.** (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	**Escrow funds and operating accounts are separately maintained.** The Company maintains (3 "Settlement Trust Accounts" 1 NJ, 1, PA, 1, FL) for real estate and mortgage loan transactions. Escrow/trust funds The Company maintains under a fiduciary capacity are not commingled with The Company's operating funds or an employee or manager's personal account. **Escrow/Trust Accounts Trial Balance Reports.** A trial balance report depicting the balance of a particular customer's funds can be produced for each escrow/trust account at any time. This report depicts all individual customer file balances that do not have a zero balance. On a monthly basis, Core Financial Outsourcing, Inc. reconciles the trial balance report to the bank balance and reconciled book balance, creating "three way" reconciliation. (In Florida Brad Thom) Trial balance reports are produced for each escrow/trust account maintained by The Company, including recording accounts and underwriter premium accounts. **Escrow/Trust Account Reconciliations** It is the responsibility of Core Financial Outsourcing, Inc. to reconcile the escrow/trust accounts. Account receipts and disbursements activity are reconciled daily (two-way). A three-way reconciliation between the bank records, book records, and trial balance is performed. This reconciliation is completed within 10 of days after receipt of bank statement. (In Florida Brad Thom) A listing is kept of all escrow/trust accounts. This listing includes underwriter

premiums accounts, recording accounts and dormant accounts.

Escrow/trust account reconciliations are performed by a third party accounting firm that does not have check signing authority or the capability/authority to perform wire transfer transactions.

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

Escrow/trust account reconciling items are clearly noted on the reconciliations. These reconciling items are followed up and addressed by Operations Manager Lisa Logan within 10 days of completion of the reconcilement so as to not carry over on the reconciliations from month to month.

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

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

Dormant file balances.

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

Banking Transactions conducted by authorized employees.

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

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

	Positive pay, ACH Blocks, and international wire blocks are used. The "Positive Pay" feature offered by our financial institutions is used on escrow/trust accounts. Ed Knell reviews the positive pay exception report (end of month when we receive bank statements) All positive pay reports are maintained and any exceptions are documented and explained. ACH blocks and international wire blocks are placed on all escrow/trust accounts to prevent unauthorized users from withdrawing funds from the escrow/trust account. **Background checks.** Before an individual is hired, a background check (criminal and credit) is performed by Intelius Search. Every two years a background check (including criminal and credit) is performed on existing employees who have access to escrow/trust account funds. **Escrow/trust account training.** The Company provides escrow/trust account training annually and as needed to individuals handling customer funds and conducting escrow/trust account reconciliations. This training is conducted by Old Republic National Title. All training and continuing education is tracked and maintained by Operations Manager - Lisa Logan.

Contact Officer	Operations Manager - Lisa Logan
Date Approved	*O5/27/2015*
Date of Commencement	*O4/04/2015*
Amendment Dates	
Date for Next Review	*09/2015*
Related References and Links	• *Policies and procedures relating to escrow accounting and trust accounts are located in PTS network drive in a folder entitled "Best Practices", sub folder Escrow Accounting"* • *Banking agreements and wire transfer user reports are located in PTS network drive in a folder entitled "Best Practices" sub folder Bank and Wire reports.* • *Escrow Account Info is located in PTS network drive in a folder entitled "Best Practices", sub folder" Escrow Account Info.*

Privacy and Information Security

Purpose	Document a privacy and information security program (policies and procedures) to help ensure **Property Transfer Services Inc.** maintains written protocols for the protection of data and Non-public Personal Information (NPI).
Scope	These policies and procedures are for all of Property Transfer Services Inc. (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	The Company has a formal privacy and information security program that is appropriate with the size and complexity, the nature and scope of the Company's activities and the sensitivity of the information in the Company's possession. As part of this program, The Company maintains a Privacy Policy Notice (see attached) that is posted on The Company's website and provided to customers and consumers for each order processed. Additional information about The Company's privacy and information security program is available to consumers and customers upon request. The Company policies associated with the privacy and information security program are given to all employees and the employees must acknowledge in writing that they have read and understand such policies. It is the responsibility of Christine Rafi (Head of Operations) to help ensure The Company has received all employee acknowledgements. The Company makes an annual assessment of the standards and requirements affiliated with The Company's information security program, including those set out in this policy and procedure document. This assessment is conducted by Old Republic National Insurance Company and a formal report on compliance is issued to The Company management. **Physical Security of NPI** The Company utilizes Old Republic National Title Insurance Co. as the information provider for background and credit checks. The Company individuals who have access to NPI is restricted to authorized principals and employees who have undergone a formal background check and credit report process which identified no irregularities.

Removable media devices, including but not limited to external hard drives, compact discs, magnetic tapes and USB/flash drives are issued by the Company with the approval of Management The use of removable media devices is prohibited unless President has authorized such use. Removable media is kept in a secure area and accounted for by Management when not in use.

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

Network Security of NPI

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

Access to The Company's information technology computers and network is secured by individual and unique passwords. The Company utilizes a computer application that prompts employees to change passwords in regular frequency specify frequency, 30 days. All The Company's computers no mater, desktop or laptop run a "screen timeout" application causing automatic system sign off when the system detects no activity for a period of 5 minutes.

Disposal of NPI

The Company has defined and communicated to employees the types of data/information that falls into the NPI category. Any NPI data is disposed of accordingly. Paper records by shredding. Small shredders are available throughout the office. When needed Shred IT is call for large jobs and documented as to when and how much was disposed. When disposing of computers and portable storage devices, The Company uses a software application to erase/wipe clean the device.

Disaster Management Plan for NPI

The Company has a documented disaster management plan to help ensure adequate back-up, recovery and business continuation procedures. The plan also includes required procedures for notification and response to security incidents and breaches. The plan is called PTS IT Disaster Management Plan.   The Company also maintains insurance coverage E&O coverage, Fidelity and Surety Insurance, the policies are available at anytime and keep

	in the office under Insurance Coverage. The disaster management plan is reviewed on an annual basis by Senior Management and Mike Rapf (President) and updated as appropriate. **Security Practices of Independent Service Providers** If independent service providers for The Company receive NPI from The Company, The Company shares this policy document with the service provider and/or conducts appropriate due diligence of the NPI security measures of the service provider before transmitting any NPI data. Service providers are aware they must notify The Company regarding NPI security breaches of NPI data that has been transmitted. If security breaches occur, proper notification is provided to consumers and law enforcement in accordance with The Company's privacy and information security program and disaster management plan.

Contact Officer	Head of Operations- Christine Rafi
Date Approved	*05/27/2015*
Date of Commencement	*04/04/2015*
Amendment Dates	
Date for Next Review	*09/2015*
Related References and Links	*Internal Company Policies:* • *Specific privacy and information security program policies are located in PTS network drive in a folder entitled "Best Practices", sub folder" Internal Policies.* • *The Company's information on security program and Disaster Management Plan are keep in Management of PTS's folder entitled" Information Security" and "Disaster Recovery"* • *The Company's "Privacy Policy Notice" document is kept on the PTS Title, network drive so that employees may access it and utilize as necessary.*

Policies and Procedures
Document Recordation / Title & Settlement Pricing

Purpose	Document recordation and rate/pricing procedures and policies to assist **Property Transfer Services Inc.** in compliance with applicable contractual obligations and Federal and State Consumer Financial Laws.
Scope	These policies and procedures are for all Property Transfer Services Inc. (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	**Pricing Procedures** **The Company utilizes rate manuals and online calculators, as appropriate to ensure correct fees are being charged for title insurance policy premiums, state-specific fees and endorsements.** Employees are aware of contractual and statutory rate and pricing requirements. Title insurance policy premiums, state specific fees and endorsements are calculated in accordance with the title insurance underwriter or regulatory or promulgated rate manual through The Company's software and/or through the use of title insurance underwriter rate calculators. All applicable rate discounts, such as Simultaneous Issue, Reissue, Refinance, and Substitution rates are calculated in accordance with the requirements in the rate manual. When rate change bulletins are received, Head of Compliance, Christine Rafi will communicate these rate changes to the appropriate parties and will test the accuracy of such changes and report the results to Company Management. Throughout the year a representative sample of closed files is subject to a post-closing review by Head of Operations Christine Rafi to conclude if fees were correctly charged.

	Recording Procedures **Submit or ship documents for recording to the county recorder (or equivalent) or the person or entity responsible for recording within 3 business days of settlement**. After review of county specific recording requirements documents are submitted for recordation by Nadine Vachna (Post Closing Department NJ & PA, Nicole Bensema FL.). When available and economically feasible, document recordation will be processed electronically via E-recording. When E-recordings cannot be utilized or are not available and when The Company does not utilize an employee, documents will be shipped for recording. The Company ships documents using UPS and tracks all packages and maintains tracking information. **Timely responses to recording rejections and verify recording is filed of record.** Nadine Vachna maintains a Recording Log to monitor all recordings. After documents are sent for recordation, The Company maintains contact with the appropriate personnel and parties to resolve any problems. The Company updates the Recording Log with information about outstanding recordings and rejected recordings, status and resolution. After documents are recorded, detailed information such as book, page, instrument number, time and date are included in the transaction file. Each week Nadine Vachna Head of Closing NJ/PA and Nicole Bensema, Operations, in FL. reviews and signs off on the Recording Log.

Contact Officer	*Head of Closing- Nadine Vachna*
Date Approved	*05/27/2015*
Date of Commencement	*04/04/2015*
Amendment Dates	
Date for Next Review	*09/2015*
Related References and Links	• *Recording Log is located in located in PTS network drive in a folder entitled “Best Practices”, sub folder” Document Recording Log* • *Rate Manuals are located in located in PTS network drive in a folder entitled “Best Practices”, sub folder” Rate Manuals.* • *Post-Closing Reviews are located in located in PTS network drive in a folder entitled “Best Practices”, sub folder” Post Closing*

Title Policy Production/Premium Remittance

Purpose	Maintain written procedures related to title policy production, delivery, reporting and premium remittance to the insurer to help ensure **Property Transfer Services Inc.** meets its legal and contractual obligations.
Scope	These policies and procedures are for all of Property Transfer Services Inc. (hereafter referred to as “The Company”) locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	**Policy Inventory** The Company receives its policy inventory directly from the insurer. A Policy Inventory Report is maintained to track and monitor all of the paper and/or electronic policy numbers allocated to The Company. When policies are issued to customers, they move into an ‘issued’ status within the Policy Inventory reports. . The following items are included in the Policy Inventory report: • The date paper and/or electronic policies are received by or allocated to The Company • The file number associated with each policy number • Unused policies • Voided policies • Policy numbers assigned, but not yet reported to the insurer • Policy issued, but not yet reported to the insurer In addition to the Policy Inventory report, The Company has a tracking system that identifies files that have closed for which policies have not been issued. Paper policy stock is kept locked up. Electronic policy stock is limited to authorized users with login and passwords. Policy inventory duties have been clearly defined and are the responsibility

	of the Management and Policy Dept. NJ & PA Natalie Maldonado, Nicole Bensema in FL. We are able to reconcile our policy inventory records with the Insurer's records. **Policy Issuance** Policies are issued to customers (lender and/or purchaser) 30 days after the transaction is disbursed. Electronic (or manual) logs (attached) are maintained within the software system to monitor all orders that have closed and disbursed in which final policies have not been issued. If The Company does not perform the settlement/closing, the order is tracked and monitored by Nadine Vachna (Head of Closing NJ/PA and Nicole Bensema Operations Manager FL.) to help ensure the documents are received 30 days after disbursement. If a short-form lender's policy is issued, it can be delivered immediately after disbursement; however, monitoring procedures are still in place to help ensure the necessary documents are recorded. **Premium Remittance and Policy Reporting** In accordance with contractual or statutory obligations on a monthly basis, The Company reports to the insurer all title insurance policies (including endorsements), premiums and other fees as contractually obligated. Reporting is performed using the attached policy register report that has been approved by the insurer or via electronic upload through the insurer's electronic reporting web-based system. Physical copies of the policies are emailed (or mailed) to the insurer. A policy register report is maintained by each office that performs policy production. Premium remittance duties have been clearly defined and are the responsibility of the Management Team. We are able to reconcile the premiums and fees we charged to our customers with the premiums and fees remitted to the insurer.

Contact Officer	*Head Of Post Closing Natalie Maldonado.*
Date Approved	*05/27/2015*
Date of Commencement	*04/04/2015*
Amendment Dates	
Date for Next Review	*09/2015*

Related References and Links	• *Policy Register reports is located in our underwriter's electronic policy application.* • *Policy Inventory report is located in our title production software application.*

Policies and Procedures
Professional Liability Insurance

Purpose	Document procedures for review of professional liability coverage (errors and omissions insurance, fidelity and surety bond) and so that **Property Transfer Services Inc.** has financial capacity to cover its professional services obligations.
Scope	These policies and procedures are for all Property Transfer Services Inc. (hereafter referred to as "The Company") locations including all satellite offices. These procedures are to be followed by all employees and independent contractors where applicable.
Procedures	The Company is required by their Underwriter and state law to maintain errors and omissions insurance, fidelity and surety bonds (where applicable). Management is responsible for tracking and renewing each of these insurance coverage's. The Company furnishes copies of all the insurance policies and applicable bonds to their title underwriter(s), including all endorsements, and proof of payment of the current premium. **Professional Liability Insurance Coverage - Errors and Omissions** The Company carries professional liability insurance for errors and omissions in accordance with The Company's contractual obligations in the amount of at least $1,000,000 issued by Berkley Assurance Company, a company acceptable to our title insurance underwriter. This comprehensive liability policy has a deductible of no more than $10,000 per loss. A copy of most current policy is attached. **Fidelity Bond Coverage** Fidelity coverage is required by Old Republic Surety Company, for the state of Florida & Pennsylvania. The Company carries fidelity coverage of $50,000 issued by Old Republic Surety Company. A copy of most current bond is attached.

	When requested by the customer or required by state regulation, the Company will issue an insurer's Closing Service Letter (CSL) in connection with the settlement funds and issuance of a title insurance policy. This CSL will be issued via the insurer's automated Closing Service Letter system. When required by state regulation the Company will set aside funds in a statutory indemnity fund to cover fidelity losses not otherwise covered by the protections afforded by the insurer. **Surety Bond Coverage** Surety bond coverage is required by Pennsylvania & Florida, and issued by Western Surety Company issued in the amount of $150,000. A copy of the most current bond is attached.

Contact Officer	*Head of Operations- Christine Rafi*
Date Approved	*05/27/2015*
Date of Commencement	*04/04/2015*
Amendment Dates	
Date for Next Review	*09/2015*
Related References and Links	• *Insurance information is located in PTS network drive in a folder entitled "Best Practices", sub folder" Insurance Policies.* • *Copies of policies are located in a File folder labeled Insurance Policies in Sue VanBergen Head of Operations file drawer.*

Policies and Procedures	
Consumer Complaints	

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

Contact Officer	*Michael Rapf- President*
Date Approved	*05/27/2015*
Date of Commencement	*04/04/2015*
Amendment Dates	
Date for Next Review	*09/2015*
Related References and Links	• *Consumer Complaint Form is located in PTS network drive in a folder entitled "Best Practices", sub folder "Customer Complaints"* . • *Consumer Complaint Log is located in File Folder labeled Customer Complaints in President Michael Rapf file drawer.*