

ALTA Best Practices Policy

At Harlan and Associates, 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. While we have historically maintained the vast majority of these business practices in conducting our day-to-day business and also understanding that these ALTA guidelines are strictly voluntary, Harlan and Associates has chosen to ratify and embrace the sum total of these Best Practices on behalf of our customer's and business partner's real estate transactions.

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We hereby Pledge to innovate new business practices and tools to enhance the settlement experience, provide ongoing employee training for quality service and regulatory compliance, and implement written procedures in conformance to these Best Practices on your behalf.

The Seven Effective Habits of Highly Successful Best Practices:

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

Harlan and Associates holds all licenses as a title insurance agency and for requisite individuals dependent upon job responsibilities. Such licenses are reviewed by our on an annual basis.

Harlan and Associates provides all required corporate governance filings and reports to the State of Georgia as a matter of course. We also secure all local business licenses and permits required to do business.

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

Harlan and Associates deploys all appropriate and essential procedures and controls related to its Escrow Trust Accounts as required by the State Bar of Georgia, the Consumer Financial Protection Bureau, and our underwriters to safeguard your funds. All Escrow Trust Accounts are reconciled daily.

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.

Harlan and Associates 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. Harlan and Associates has developed a Disaster Management Plan for the company's network, systems, and applications. This Plan is exclusive of the company's routine upgrade and maintenance policies.

Harlan and Associates utilizes encrypted email for transmitting non-public personal information.

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

Harlan and Associates performs employee screening in the form of background checks in its hiring process and regularly conducts background checks every year. These background checks are available to our underwriters and our underwriters may institute random background checks on our employees as well.

Best Practice 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.

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

Harlan and Associates maintains training for Mortgage Fraud Awareness and Prevention that includes, but is not limited to, constructing a proprietary Fraud Alert System built on data and information routinely provided to us by our underwriters.

Harlan and Associates provides Pricing Procedures and Controls in the form of underwriter's rate manuals, our production system, and online calculators (as appropriate) to help ensure the correct fees are being charged for title insurance policy premiums, state-specific fees and endorsements. 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.

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

Harlan and Associates maintains all requisite procedures for timely issuance of title insurance policies to Owners and Lenders as dictated by federal law, and underwriter mandates.

Harlan and Associates 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.

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

We secure 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. Such insurance also includes any mandated coverages called for by our underwriters.

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

Not happy? We welcome receiving any complaint you might have. We have developed written procedures to capture, review, and timely address any issues or concerns you may have regarding our services. You can submit a complaint at our website, call and request a complaint form be sent to you, or simply send company management an email explaining your situation. We want to know about any poor service experience or compliance concern you might have. Your confidence and satisfaction is important to us.