

PYA, P.C. ("PYA") performed the assessment procedures enumerated in the American Land Title Association ("ALTA") Best Practices Framework: Assessment Procedures dated October 7, 2016 ("Procedures"). These Procedures were agreed to by the Company to assist it in evaluating compliance with the ALTA Title Insurance and Settlement Company Best Practices, dated October 7, 2016 ("Best Practices"). Additionally, PYA performed an information technology security assessment according to Gramm-Leach-Bliley Act ("GLBA"); for the results of this security assessment, see our separate report dated May 1, 2019.

Procedures executed related to the following ALTA Best Practices:

**Pillar 1 - Licensing** 

Pillar 2 - Escrow Accounting Procedures

☑ Pillar 3 - Privacy & Information Security

**Pillar 4 - Settlement Procedures** 

Pillar 5 - Title Policy Production & Delivery

☑ Pillar 6 - Professional Liability Insurance Coverage

Pillar 7 - Consumer Complaints

Our assessment of such Procedures rendered a conclusion of:

## **Optimized**

as of May 1, 2019

PYA, P.C.

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The scope of PYA's engagement was performed according to AICPA consulting standards. PYA's scope was limited to performance of the Procedures. We neither express an opinion regarding (i) the sufficiency of the Procedures for any particular purpose, nor (ii) compliance with the Best Practices.

This certificate is intended solely for the use of the Company. It is not intended to be relied upon by anyone other than the Company itself. Use of or reference to this certificate other than by the Company is at the user's sole responsibility and risk.

PYA Assessment Verification Status. Verify at www.pyabestpractices.com/verify: 2X55-A3QW-QVQQ-JW