



October 1, 2015



The American Land Title Association (ALTA) has worked with the regulators and come up with the concept of the seven "Pillars of Best Practices". Closing agents are encouraged by ALTA on its website to implement the "Pillars of Best Practices" by preparing a written Best Practices Manual documenting the company's specific practices and policies that show compliance with each pillar or area.

As a part of our Vender Management Program, Freedom will be requiring the Closing Agents' Best Practices Manual be adopted. As such we are requiring validation and certification that support adherence to each "pillar" or area of Best Practice as follows:

No.1: Closing agent must establish and maintain current licenses(s) as required to conduct the business of title insurance and settlement service.

No.2: Closing agent must adopt and maintain appropriate written procedures and controls for escrow trust accounts allowing for electronic verification of reconciliation.

No.3: Closing Agent must adopt and maintain a written privacy and information security program to protect non-public Personal Information as required by local, state and federal law.

No.4: Closing agent must 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.

No.5: Closing agent must adopt and maintain written procedures related to title policy production, delivery, reporting, and premium remittance.

No.6: Closing agent must maintain appropriate professional liability insurance and fidelity coverage.

No.7: Closing agent must adopt and maintain written procedures for resolving consumer complaints.

In order to comply with our Vendor Management requirements, please submit one or more of the following two items: 1) a copy of your ALTA Best Practices Manual (or similar); or 2) an independent audit report or SSAE16 report/similar of compliance with ALTA Best Practices Manual. In addition, please complete the Freedom Certification & Acknowledgment form for compliance with ALTA Best Practices procedures and controls.

We appreciate your cooperation in advance of our request. Please return the attached certification form as well as ALTA Best Practices independent audit report or procedure manual to the following address:

Freedom Mortgage Corporation, Attn. Sara Davis/Vendor Management, 10500 Kincaid Drive, Fishers, IN 46038 or email at sara.davis@freedommortgage.com.

If any questions, please contact Yvette Binn-Graham, Esq, Legal Department at 800-220-3333 x2448 or Yvette.binn-graham@freedommortgage.com.

Sincerely,



Sara Davis
VP Vendor Management