

## TrustLink Services and ALTA Best Practice #2 Comparison

ALTA Best Practice #2		TrustLink Services
<p><b>Escrow funds and operating accounts are separately maintained.</b></p> <p>Escrow funds or other funds the Company maintains under a fiduciary duty to another are not commingled with the Company's operating account or an employee or manager's personal account.</p>	✓	Daily 3-way reconciliation by bank account provides transparency.
<p><b>Escrow Trust Accounts are prepared with Trial Balances.</b></p>	✓	Daily 3-way reconciliation
<p><b>Escrow Trust Accounts are reconciled.</b></p> <p>On at least a daily basis, reconciliation of the receipts and disbursements of the Escrow Trust Account is performed.</p> <p>On at least a monthly basis, a Three-Way Reconciliation is performed reconciling the bank statement, check book and Trial Balances.</p> <p>Segregation of duties is in place to help ensure the reliability of the reconciliation and reconciliations are conducted by someone other than those with signing authority.</p> <p>Results of the reconciliation are reviewed by management and are accessible electronically by the Company's contracted underwriter(s).</p>	✓ ✓ ✓ ✓	<p>Daily 3-way reconciliation</p> <p>Daily 3-way reconciliation</p> <p>TrustLink Services is an impartial 3rd Party</p> <p>Management Approval Available. Reconciliation and supporting reports are available electronically 24/7 on MyTrustLink.com</p>
<p><b>Escrow Trust Accounts are properly identified</b></p> <p>Accounts are identified as "escrow" or "trust" accounts. Appropriate identification appears on all account-related documentation including bank statements, bank agreements, disbursement checks and deposit tickets.</p>	✓	Documentation may be uploaded and imaged into TrustLink. Our banking department verifies the account is set up as "escrow" or "trust" when the electronic banking is set up for the daily 3-way reconciliation.
<p><b>Outstanding file balances are documented.</b></p>	✓	TrustLink's Unclaimed Property Service performs due diligence to locate the owners of the funds. If owners cannot be located TrustLink staff prepares the report for the customer to escheat to the State. All correspondence is available in electronic format.
<p><b>Transactions are conducted by authorized employees only.</b></p> <p>Only those employees whose authority has been defined to authorize bank transactions may do so. Appropriate authorization levels are set by the Company and reviewed for updates annually. Former employees are immediately deleted as listed signatories on all bank accounts.</p>	✓	TrustLink Services provides a procedures and controls template for the customer to document the roles and responsibilities of their authorized employees. This document provides a complete template to list all accounts and employees who have access or rights to authorize bank transactions.
<p><b>Unless directed by the beneficial owner, Escrow Trust Accounts are maintained in Federally Insured Financial Institutions.</b></p>	✓	TrustLink's Banking Set-up Team provides information on banks and alerts customers if their bank is not in a Federally Insured Financial Institution.
<p><b>Utilize Positive Pay or Reverse Positive Pay, Automated Clearing House blocks and international wire blocks, if available.</b></p>	✓	TrustLink Services provides Positive Pay service to submit the file to the bank prior to the bank cut-off date. This is documented and tracked in real time.
<p><b>Background Checks are completed in the hiring process. At least every three years, obtain Background Checks going back five years for all employees who have access to customer funds.</b></p>		TrustLink Services does not provide background checks, but can provide contact information on companies who conduct background checks at a negotiated rate with First American. Any of our customers may use that company and receive the negotiated/preferred rate. TrustLink provides a procedures and controls template to document the dates of the background checks to adhere to these Best Practices.
<p><b>Ongoing training is conducted for employees in management of escrow funds and escrow accounting.</b></p>		TrustLink Services provides training to navigate the systems and websites for the trust accounting reconciliation and report processing. The procedures and controls template allows the customer to document employee training and dates completed.