

## EXHIBIT A SIGNING AGENT'S PROFESSIONAL EXPECTATIONS

The purpose of this document is to share what is expected of signing professionals supporting The Closer, LLC real estate transactions. Each stage of the real estate transactions leaves an impression on the borrower and the signing experience is no exception. Preparedness, professionalism and presentation, among other important attributes, help establish the confidence the borrower has in the signing professional's abilities and ultimately reflect back on our company brand.

### **GENERAL**

The signing professional is expected to perform his/her duties as established by the law and other governing bodies.

Misconduct in any form, to include the mishandling of borrower Closing documents, is not tolerated and will require corrective action. Corrective action includes, but is not limited to:

- Waiver of negotiated signing fees.
- Removal of signing professional from supporting future The Closer, LLC signings for not complying with guidelines on 3 separate occurrences.
- Removal of signing professional from supporting future The Closer, LLC signings at the request of the Title Company or Lender.

### **COMMUNICATION WITH THE BORROWER**

When establishing contact with the borrower it is important that the signing professional properly introduces himself/herself in a manner that assures the borrower of the representative's identity and legitimacy.

- Introduction: "Hello, my name is John Smith with (XYZ Company) and I am handling the signing of your loan with [bank name]".
- If the signing professional receives the borrower's voicemail, the representative should leave a clear message to include their name, role, purpose, and call back number.
- The call back number for the signing professional should have voicemail with a recorded message stating their first and last name, role as notary/attorney, and a professional message.
- The signing professional should confirm with the borrower the signing logistics (date, time, location, copy of ID) and that all parties required to sign the Closing documents will be present at the signing table.

### **PREPARATION FOR THE SIGNING**

Careful preparation for a signing is essential to a positive signing experience. The signing professional should ensure they have everything they need prior to arriving at the signing.

- Obtain directions to the signing location from a reliable resource (borrower, MapQuest, Google maps).
- Print 2 copies of the Closing documents before the signing. One is for execution. The other is for the borrower's records. An electronic copy of the Closing documents is NOT permitted unless the borrower requests it and you should contact The Closer, LLC to facilitate that request.
- Make sure the Closing documents you have are for the borrower you are meeting prior to arrival at closing. If an error is found on the Closing documents you should contact The Closer, LLC immediately.
- Do NOT make corrections to Closing documents without getting approval from The Closer, LLC. Be organized. Have the Closing documents ready to present to the borrower and have plenty of Black and Blue ink pens as required.

### **PUNCTUALITY**

Punctuality is another important aspect of the signing experience and it shows the borrower that their time is valuable.

- BE ON TIME!
- Stay in touch. The signing professional should notify the borrower PRIOR to the scheduled appointment time and advise them of your delay even if the anticipated arrival time is 1 minute past the scheduled appointment time. Preferably, notification to the borrower should occur at least 30 minutes prior to the scheduled appointment time. The signing professional should also notify The Closer, LLC if he or she will be delayed.
- DO NOT OVERBOOK. The signing professional should always leave plenty of time to print, review, and travel to their next signing appointment.
- Do not reassign. If you are unable to make a scheduled appointment, the signing professional should contact The Closer, LLC to discuss options for rescheduling. Do not take it upon yourself to send someone else to your appointment.

### **APPEARANCE AND HYGIENE**

The signing professional should project a professional, well groomed image to include a neat appearance and good personal hygiene. Both business attire and business casual attire are appropriate (Please review the Signing Agent Dress Code – Exhibit B). Smokers should be conscious of the sensitivity of non-smokers as well as the lingering affect that smoking may have on clothing, hair and skin.

### **COURTESY**

The signing professional should always depict professional and respectful behavior during the signing regardless of the signing location (borrower's home, bank branch, borrower's work, etc.) and the informality reflected in the environment.

- Do NOT bring any guests (child, friend, spouse, pet) to a signing. Have your fellow travelers wait outside in your vehicle.
- Park on the street. Never park in the borrower's driveway.
- Use designated walkways and paths to get to the front door. Do not walk on lawns or flower beds. Be careful of tracking any items on your shoes into their homes.
- Introduce yourself as a signing professional at the request of the Lender and the Title Company.
- Be prepared to allow the borrower to review your identification and credentials.
- Greet the borrower with a handshake and wait to be invited in the home. Once inside suggest the most appropriate place to conduct the signing such as a kitchen or dining room table.
- Be respectful of the banking center and their personnel. Make contact with them upon arrival to identify what space is available for the signing.

### **CONDUCT DURING SIGNING**

Each borrower's prior involvement with the signing process will be different. Some have participated in many signings, while others may be completing their first. The borrower may have many concerns or have lots of questions. The signing professional should be prepared to respond appropriately to include calling The Closer, LLC for assistance or help directing the borrower's questions to the appropriate Title or Lender representative. The signing professional's confidence, control, and preparation can influence the direction of the signing.

- Focus complete attention on the borrower and signing activity at hand.
- Do not accept calls during a closing unless it's in regards to the closing at hand.

- Place cell phones, pagers, and other electronic devices on silent or off mode.
- Witness the borrower signing. Do not leave the borrower to sign alone for any reason.
- Present the entire Closing document for review and signature. It is never acceptable to present the signature pages only.
- Be patient. Borrowers should not be rushed through the signing process.
- Be prepared to speak to the general functionality of a Closing document in the package.
- Borrower should direct loan specific questions to their bank representative if they have questions regarding the details of the loan. Any opinion/response from the signing professional may confuse the borrower or imply a promise or commitment outside the scope of the transaction.
- Contact The Closer, LLC immediately if the borrower refuses to sign any Closing documents.
- Respect the importance of this transaction to the companies you represent. Do NOT engage in conversation with the borrower that may discredit either the Lender, Title Company, or The Closer, LLC.
- Do not provide advice of any sort to the borrower or any party involved in the transaction.
- Do not engage in personal conversation with the borrower at any time. No discussion outside of closing is appropriate.
- Avoid small talk of all kinds. Sports, Religion, Politics, News events, or comments on the borrower's home should be avoided at all costs.
- Never use foul language or slang while speaking to a borrower.
- Double and triple check Closing documents for accuracy, missing signatures, or stamps.
- Thank the borrower for their time.
- Forward the executed Closing documents immediately to the appropriate party following the signing.
- The security and protection of borrower information is a priority. The transporting and transmission of the closing package and all related Closing documents/information should be handled with extreme care. Please refer to the Privacy and Breach Event Guidelines (Exhibit C) for further instructions.

## EXHIBIT B SIGNING AGENT DRESS CODE

### **ACCEPTABLE DRESS CODE**

Business Attire:

Business suits – men’s & women’s

- Business slacks
- Skirts/Dresses (to the knee or below)
- Dress shirts with tie
- Blouses
- Dress shoes

Business Casual Attire:

- All of the above plus
- Pants:
  - Tailored slacks, dockers, or khakis
  - Capris/Crop pants (must be 4” below the knee)
  - Split skirts (to the knee or below)
- Shirts:
  - Dress shirt without tie
  - Polo shirt (must have collar)
  - Sweaters
  - Sleeveless blouses/dresses (must cover the shoulders, back, and midriff at all times)
- Shoes:
  - Casual dress shoe
  - Sling back/Open-toe shoes

### **UNACCEPTABLE DRESS CODE**

Standards

- No writing and/or logos on any clothing
  - Exception is a small logo such Polo, Nike Swoosh, Lacoste over the chest or on a pocket
- No clothing where undergarments are seen
- No bare backs, cleavage, midriffs or hips
- Nothing too tight, too baggie, too low, or too sparkly
- No rips, tears, holes or shredding of any kind



**UNACCEPTABLE DRESS CODE (cont)**

- No distracting facial piercings or exposed body piercings
- No inappropriate, distracting or obscene tattoos (must be covered)
- No hair styles/color that are distracting (example Mohawks, unnatural colors)
- No footwear with straps between the toes (example flip-flops/thongs)

**UNACCEPTABLE ATTIRE**

- No camouflage
- No skorts
- No mid-calf pants for men
- No overalls
- No head scarves
- No jogging/exercise apparel
- No leggings, stirrup pants, spandex or cycling pants/shorts.
- No halter or tube tops
- No jeans
- No shorts
- No sneakers

## EXHIBIT C PRIVACY BREACH AND EVENT GUIDELINES

### DEFINITION OF PRIVACY EVENT

A privacy event is the unauthorized or inappropriate access or use of borrower information that is provided to signing professional (the "Privacy Event").

- This includes unauthorized or inappropriate access or use of borrower information.
- Information may be in any form (e.g. electronic, paper, verbal, etc.).

Though requirements vary by county, borrower information generally means:  
A borrower's name, address, telephone number or email address in conjunction with;

- A national identifier (e.g. social security number);
- Driver's license number;
- Account number;
- Credit or debit card number;
- Personal identification number (PIN) or password that would permit access to an individual's account;
- Health or medical information;
- Biometric data (e.g. finger print, iris scan);
- Any combination of elements that would allow access to someone's data;  
or
- Any combination of elements that could reasonably lead to identity theft.

### Steps to take during a Privacy Event

- Signing professional must notify The Closer, LLC immediately upon discovery.
  - Call 877.245.8807
- The signing professional must immediately gather information about the Privacy Event including root cause, information on all parties involved or impacted (signing professional, borrower, associates), data elements exposed, dates and locations.
- Do not implement any corrective action, such as corrected mailings, communication with borrowers, media, law enforcement, or regulatory bodies without The Closer, LLC 's approval.
- Cooperate with The Closer, LLC, Lender, or Title investigations by participating in meetings as requested and providing timely responses to data requests.
- Implement process improvements (if necessary), to prevent future occurrences

### **GUIDELINES FOR HANDLING BORROWER DATA**

All data containing borrower information must be sent securely at all times:

- Email channels must be encrypted.
- Secured platforms are the preferred method of data sharing.
- No data should be stored/retained onto laptops or removable media.
- Signing professional must permanently delete closing documents once the signing is complete (i.e. do not retain on laptop or removable media).

#### Closing Document Security

- All Closing documents must remain in possession of signing professional and be secured at all times.
- Never leave unauthorized closing documents at a borrower's home (i.e. another borrowers' closing documents).
- Secure data when in transit (lock cars and doors at all times).
- Do not leave the closing documents in a visible location. Closing documents should always be inside a brief case, bag, or trunk.
- Secure every attachment to closing documents or data/devices holding closing documents.
- Properly dispose of files that have sensitive information on them, i.e. shredding.
- Always double check the accuracy and security of your work.

#### Faxing Closing Documents

- Do not hand loan closing documents to be faxed to another party unless that party has express rights and permissions to so.
- Ensure faxing is to a secure location and the recipient is available to receive the data.
- Confirm fax number before sending is accurate.
- Ensure cover sheet is used.

#### Shipping

- Use secure methods of delivery for shipping.
- Ensure Closing documents are being shipping are only for that intended recipient.
- Do not co-mingle Closing documents.
- Ensure that all Closing documents are in a sealed secure shipping package.
- Verify the Ship To address and phone number.
- Retain shipping tracking information.
- Drop loan package in a drop box. Do not leave it in someone's care to be picked up.

