

# Pickford Services Company

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## COMPLAINT RESOLUTION POLICY

### INTRODUCTION

At Pickford Services Company, Pickford Escrow Company, and The Escrow Firm (collectively the "Company") we want to provide the best possible service to our customers. Despite our efforts, there are occasions when a customer is not completely satisfied and complains. That complaint can be written or verbal and should be handled as expeditiously as possible to bring the matter to a resolution.

A complaint is any oral or written document expressing dissatisfaction with our Company or an employee. A complaint can also include any written inquiry from the California Department of Business Oversight, the Consumer Financial Protection Bureau ("CFPB"), or an attorney representing a consumer.

Complaints are received through an outward-facing contact on the Company's websites, through emails or through mail. When consumer feedback is entered in the contact form on the website, the contents of the form are sent to [info@pickfordescrow.com](mailto:info@pickfordescrow.com), which is a distribution group that points to the regional Directors of Operations. The regional directors are then responsible for directing the complaint to the appropriate office, and ensuring that it is entered into the Company's complaint resolution software program for tracking all complaints.

### RECEIVING COMPLAINTS

Given today's advances in technology, complaints can be received by anyone in the Company and in a variety of manners:

**Mail:** Every Company office has a post office address to which correspondence can be received. All mail delivered to this address is collected and processed by appropriate Company personnel. Any complaints should also be forwarded to the Legal Department including but not limited to complaints from state regulatory agencies.

**Email:** Every Company employee has access to email and all customers should be provided with an email contact for the Company so as to enable the customer to communicate.

**Website:** The Company website has a complaint resolution portal by which a customer can send a complaint.

# Pickford Services Company

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**Complaint Process:** Complaints that are received by the Company are addressed as expeditiously as possible through the Legal Department.

**Initial Complaint:** Upon receipt of a complaint, the Legal Department personnel will record the complaint noting the following information as it becomes available:

- Description of Complaint
- First and Last Name of Claimant
- Date Received
- Branch office and escrow officer involved
- Refer the Complaint to the appropriate person for investigation and response
- Follow up on response
- Confirm Complaint has been resolved

**Process after Initial Complaint:** After the complaint has initially been processed the following process is followed:

1. If the complaint relates to a matter that can be resolved on the local branch office level, it is first forwarded to the Legal Department for advice and then can be handled at the branch level. These matters include, but are not limited to, paperwork errors, copies of documents, corrective documents, or documents that have not been recorded.

2. If the Complaint relates to any other matter, it is assigned to an attorney in the Legal Department for review and investigation with appropriate Company personnel. The attorney will prepare and submit the response to the appropriate regulatory body/complaining party.

3. If the Complaint relates to Company personnel, the Human Resources Department must be notified immediately along with the Legal Department. All future correspondence and action will be taken by the Human Resources Department and/or the Legal Department. Branch level employees are not permitted to handle employee matters without first consulting with the Human Resources Department.

## **Responses to Complaint:**

All complaints will be responded to without exception. Responses to complaints will be written in a clear, concise manner to address each of the concerns contained in the complaint. The timeliness of submitting responses is monitored by the Legal

# Pickford Services Company

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Department to ensure complaints are responded to in a timely fashion. A copy of the response is maintained in the complaint file. All written responses should be made within seven (7) days of receipt except for regulatory responses which are governed by the timeline established by the regulatory agency.

## **Closed Complaint Files:**

Upon resolution of a complaint, the complaint file is closed and will be maintained by the Company in accordance with the Company's record retention policy and all applicable laws.