

PICKFORD ESCROW

COMPANY

THE

ESCROW FIRM

October 26, 2023

Baker Tilly US, LLP
18500 Von Karman Avenue, 10th Fl.
Irvine, CA 92612

In connection with your engagement to report on Pickford Services Company's (service organization) description of its escrow system titled "Pickford Services Company's Description of its escrow system" throughout the period of July 1, 2022, to June 30, 2023 (description) based on the criteria for a description of a service organization's system in DC section 200, *2018 Description Criteria for a Description of a Service Organization's System in a SOC 2® Report* (AICPA, *Description Criteria*), and the suitability of the design and operating effectiveness of controls stated in the description throughout the period of July 1, 2022, to June 30, 2023, to provide reasonable assurance that Pickford Services Company's service commitments and system requirements were achieved based on the trust services criteria relevant to security (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy* (AICPA, *Trust Services Criteria*), we recognize that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion about whether the description presents the system that was designed and implemented throughout the period of July 1, 2022, to June 30, 2023 in accordance with the description criteria and whether the controls stated in the description were suitably designed and operating effectively throughout the period to provide reasonable assurance that Pickford Services Company's service commitments and system requirements were achieved based on the applicable trust services criteria.


We confirm, to the best of our knowledge and belief, as of October 26, 2023, the following representations made to you during your examination:

1. We reaffirm our assertion attached to the description.
2. We have evaluated the presentation of the description in accordance with the description criteria and the suitability of the design and operating effectiveness of controls stated therein to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria, and all relevant matters have been considered and reflected in our evaluation and in our assertion.
3. We have disclosed to you any of the following of which we are aware:
 - a. Misstatements (including omissions) in the description.
 - b. Instances in which controls were not suitably designed and implemented.
 - c. Instances in which controls did not operate effectively or as described.

- d. Any communications from regulatory agencies, user entities, or others affecting the presentation of the description or the suitability of the design or operating effectiveness of the controls stated therein, including communications received between the end of the period addressed in our description and the date of your report.
 - e. All other known matters contradicting the presentation of the description or the suitability of the design or operating effectiveness of the controls stated therein or contradicting our assertion.
 4. We acknowledge responsibility for our assertion and for:
 - a. the presentation of the description in accordance with the description criteria and the suitability of the design and operating effectiveness of the controls stated therein to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria.
 - b. selecting the trust services category or categories and criteria to be included within the scope of the examination and determining that the criteria are available to intended users and they are appropriate for our purposes.
 - c. stating the applicable trust services criteria and related controls in the description.
 5. We have disclosed to you any known events subsequent to the period covered by the description up to the date of this letter that would have a material effect on the presentation of the description or on the suitability of the design or operating effectiveness of the controls stated therein or on our assertion.
 6. We have disclosed to you any changes in the controls that are likely to be relevant to report users occurring through the date of this letter.
 7. We have provided you with all information and access that is relevant to your examination and to our assertion, as agreed upon in the terms of the engagement.
 8. We believe the effects of uncorrected misstatements, if any, are immaterial, individually and in the aggregate, to the presentation of the description in accordance with the description criteria or to the suitability of the design or operating effectiveness of the controls stated therein to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria.
 9. We have responded fully to all inquiries made to us by you during the examination.
 10. We have disclosed to you any of the following of which we are aware:
 - a. Actual, suspected, or alleged fraud or noncompliance with laws or regulations affecting the presentation of the description or the suitability of the design or operating effectiveness of the controls stated therein.
 - b. Instances of noncompliance with laws and regulations or uncorrected misstatements attributable to the service organization that may affect one or more user entities.
 - c. All identified system incidents that resulted in a significant impairment of the service organization's achievement of its service commitments and system requirements during July 1, 2022, to June 30, 2023.
 11. We understand that your report is intended solely for the use and information of Pickford Services Company, user entities of Pickford Services Company's escrow system during July 1, 2022, to June 30, 2023, business partners of Pickford Services Company subject to risks arising from interactions with the Pickford Services Company escrow system, practitioners providing services to such user entities and business partners, prospective user entities and business partners, and regulators who have sufficient knowledge and understanding of the following:

- The nature of the service provided by the service organization.
- How the service organization's system interacts with user entities, business partners, subservice organizations, and other parties.
- Internal control and its limitations.
- Complementary user entity and subservice organization controls and how these controls interact with the controls at the service organization to achieve the service organization's service commitments and requirements.
- User entity responsibilities and how they may affect the user entity's ability to effectively use the service organization's services.
- The applicable trust services criteria.
- The risks that may threaten the achievement of the service organization's service commitments and system requirements and how controls address those risks.
- We intend to distribute your report only to those specified parties.

We understand that your examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The examination was designed for the purpose of expressing an opinion about whether, in all material respects, the description is presented in accordance with the description criteria and whether the controls stated therein were suitably designed and operated effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. We also understand that the opinion was based on your examination and that the procedures performed in the examination were limited to those that you considered necessary.



Martha Mosier
President, Pickford Escrow and The Escrow Firm

Appendix - Pickford Services Company

We have prepared the accompanying description of Pickford Services Company's (the "Company" or "Pickford") escrow system titled "Pickford Services Company's Description of its Escrow System" throughout the period July 1, 2022, to June 30, 2023 (description), based on the criteria for a description of a service organization's system in *DC section 200, 2018 Description Criteria for a Description of a Service Organization's System in a SOC 2® Report* (AICPA, *Description Criteria*) (description criteria). The description is intended to provide report users with information about the escrow system that may be useful when assessing the risks arising from interactions with Pickford's escrow system, particularly information about system controls that Pickford has designed, implemented, and operated to provide reasonable assurance that its service commitments and system requirements were achieved based on the trust services criteria relevant to security (applicable trust services criteria) set forth in TSP section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy* (AICPA, *Trust Services Criteria*).

Pickford uses subservice organizations for data center and disaster recovery services. The description indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Pickford, to achieve Pickford's service commitments and system requirements based on the applicable trust services criteria. The description presents Pickford's controls, the applicable trust services criteria, and the types of complementary subservice organization controls assumed in the design of Pickford's controls. The description does not disclose the actual controls at the subservice organizations.

We confirm, to the best of our knowledge and belief, that:

- a) The description presents Pickford's escrow system that was designed and implemented throughout the period July 1, 2022, to June 30, 2023, in accordance with the description criteria.
- b) The controls stated in the description were suitably designed throughout the period July 1, 2022, to June 30, 2023, to provide reasonable assurance that Pickford's service commitments and system requirements would be achieved based on the applicable trust services criteria, if the controls operated effectively throughout that period and if the subservice organizations applied the complementary controls assumed in the design of Pickford's controls throughout that period.
- c) The controls stated in the description operated effectively throughout the period July 1, 2022, to June 30, 2023, to provide reasonable assurance that Pickford's service commitments and system requirements were achieved based on the applicable trust services criteria, if complementary subservice organization controls assumed in the design of Pickford's controls operated effectively throughout that period.

Pickford Services Company

October 26, 2023