

## Management, Organization Structure, Personnel and Training

- Does a written up to date organizational chart exist?
- What is the process for updating the organizational chart for either personnel changes or realignment of functional responsibilities? Please explain how such updates are communicated/provided to employees.
- Does a written up to date employee handbook exist?
- What is the process for updating the employee handbook? Please explain how such updates are communicated/provided to employees.
- What is the process for and/or how does the company determine it has sufficient personnel to handle its current workload/volume, as well that it anticipates over the next 12 months? If you have a written process, you can upload the process on the next question.
- Identify/describe any organizational changes recently completed, in process, or being planned and the reasons for such changes.
- Please provide the current ratio and the 12 month average ratio for the following: Supervisor to Staff:    Supervisor to File:        Staff to File:
- Provide the average turnover rate for (i) staff and (ii) managers/supervisors for the last 12 months.
- Provide the average tenure for (i) staff and (ii) managers/supervisors for the last 12 months.
- Identify any default-related and REO related trade or industry groups in which the company is a member
- Is there a documented hiring/background screening procedure?
- Is there a documented diversity policy or program?
- Is there a documented drug testing policy?
- Does the company have any written policies or procedures for determining who serves as a company spokesperson or representative to the media or community?
- Are there documented supervision processes associated with the day to day work of each key position?
- Are there documented processes associated with the monitoring and/or supervision of the work load or volume of each key position and/or employee, as well as any adjustments thereto?
- Are there documented processes associated with identifying and correcting performance issues and/or terminating employees?
- Please describe the company's training program, policy, requirements and/or procedures. Be sure to include or address (i) the type of training (HR policies, specific job requirements, ethics, etc.), (iii) the frequency of each type of training, (iv) training materials and (v) documentation (logs) verifying or tracking participation.
- Does the company have a process for tracking the licensing and/or certification requirements and changes thereto, associated with any position or employee within the company?
- Please provide copies of biographies/resumes for all key employees at the company.

Strictly Confidential

- Please provide the total number of matters referred, matters completed and matters pending in the following areas for the past 24 months: foreclosure, bankruptcy, loss mitigation, evictions and/or REO related legal services. You may upload any responsive documents in the next question.

## **Audit, Internal Controls and Operational Processes/Procedures**

- Has the company been audited, certified, or undergone a quality control review within the past 2 years?
- Please describe the nature of the audit, certification or quality control review, the type and scope, and the specific processes or items covered, as well as negative findings and any corrective actions suggested and/or taken by your company.
- Does your company have written internal quality control policies/procedures?
- Please describe how the written internal quality control policies/procedures are updated for changes and are communicated or provided to all applicable employees.
- Does the company have a written data retention policy?
- Does the company have any written work flowcharts, processes and procedures associated with any service/deliverable provided by the company to or on behalf of the client, including those used to track and report the company's adherence to any contractual, investor and/or regulatory requirements associated with the provision of such services/deliverables (i.e., fees, timelines, volumes, delays, etc.)?
- Does the company have any written metrics or reports it utilizes in monitoring its adherence to the work flowcharts, processes, or procedures associated with any service/deliverable?
- Does the company have any written payment/invoicing work flowcharts, processes and procedures, including those associated with the assessment/payment of vendor fees and costs and the treatment of any excess fees and costs paid?
- Does the company have any metrics or reports it utilizes in monitoring its adherence to the payment/invoicing work flowcharts, processes, or procedures?
- Provide sample invoices from the past 12 months from vendors together with back up supporting the fees and costs contained therein.
- Does the company have any written policies/procedures related to loss mitigation and/or communication with borrowers?
- Please describe or explain how the company monitors its compliance with such policies/procedures related to loss mitigation and/or communication with borrowers.
- Are there documented expectations relating to timeline management associated with each key position?
- Are the documented expectations related to time management monitored and/or measured (via reports, etc.)?

## Corporate Governance, Legal and Corporate Liability

- Describe or provide any information which would tend to establish the company's culture in the areas of ethics, integrity, honesty, quality, training and supervision. You may upload any responsive documents in the next question.
- Does the company have any written policies or procedures related to company ethics and/or ethics particular to any position?
- Does the company have a written Whistleblower policy/procedure?
- Describe any complaints received by the company within the last 24 months, how such complaints were reported, investigated and resolved.
- Within the last 12 months have any litigation or liability claims been brought against your company or any employee of your company?
- Within the past 12 months, has your company or any of its employees (including contract lawyers or local counsel) ever been investigated or been given notice of an investigation, inquiry, or subpoena by any governmental agency or representative, judicial agency or representative, regulatory agency or representative, licensing agency or representative, or consumer group?
- Within the past 12 months, has your company or any of its employees (including contract lawyers or local counsel) been sanctioned by any court or regulatory body?
- Within the last 12 months have any criminal charges, convictions, or pleas been brought against any employee, manager, executive, chief officer, or board member within your company (other than for minor traffic or parking)?
- Within the last 12 months have there been any criminal charges, convictions or pleas brought against any secretary or other staff member within your company which specifically relate to embezzlement, fraud, misappropriation of funds, perjury, forgery, extortion, identity theft, cybercrime or money laundering?
- Within the last 12 months has your company been penalized for or discovered as committing any billing irregularities?
- Within the last 12 months has your company been served with a subpoena(s) that names your company in any manner associated with any investigation by any Federal, State or Local authorities regarding your company's invoicing practices, or the invoicing practices of any partially or wholly owned affiliated companies?
- Within the last 12 months have any news stories (local or national), articles, etc., or any claims or assertions been written, published or otherwise disseminated about your company or any of its employees (including, but not limited to, on the internet)?
- Does the company have a process for monitoring and reporting any litigation, investigation or disciplinary action brought or threatened against the company or any employee of the company?

## Strictly Confidential

- What is the legal structure and organization of the company?
- In which state was the company founded/incorporated?
- In which state(s) is the company authorized, licensed and/or certified to do business?
- Please list all owners/shareholders/partners of the company over the last 24 months, together with their period and percentage of ownership.
- Please attach current certificate(s) of insurance in the name of the company, or any individual employee of the company/acting in his/her professional capacity as an employee of the company (other than individual life, health or dental policies).
- Have any claims been made within the last 24 months under any policies provided?

## Financial

- Please provide 2013 year end audited Financial Statements (Balance Sheet, Income Statement, P&L and Cash Flow) for your company.
- Please provide interim Financial Statements (Balance Sheet, Income Statement, P&L and Cash Flow) for your company no more than 60 days old.
- Please provide the total revenues paid in the past 12 months to any entities in which your company or any of your company's shareholders own any interest(s).
- Has your company's gross and/or have your average monthly revenue dropped by more than twenty-five percent (25%) since the Balance Sheet date of the Financial Statement provided?
- Do any "Contingent Liabilities" exist that are not recorded on the most recent Balance Sheet due to various reasons including but not limited to the inability to estimate the value or because they occurred subsequent to the Balance Sheet date of the Financial Statement provided?
- Are all Federal, State, and local tax obligations, including but not limited to income taxes, payroll taxes (income tax withheld, social security and Medicare tax withheld and employer matching, federal and state unemployment tax, etc.) real estate taxes and others as applicable that are currently due based upon the return due date 100% paid?
- Do you have any outstanding tax liens?

## Vendor/Subcontractors

- Does your company have written vendor/subcontractor policies and procedures?
- What is the process for updating the written vendor/subcontractor management policies and procedures? Please explain how such updates are communicated/provided to employees.

Strictly Confidential

- Please provide a list with the names, addresses (of all primary locations if more than one) and description of goods and/or services provided for all key or primary vendors and subcontractors utilized by the company within the last 12 months, and if no longer used, the reasons why the company discontinued such use.
- For each key or primary vendor and subcontractor identified, state whether a written agreement with the company exists for the provision of such goods and/or services, and for each agreement whether the following areas are addressed and/or provisions are included and clearly defined/described: Scope of the relationship, description of services and/or deliverables; Obligation to keep confidential all information identified as such by the company; Obligation to maintain a minimum level of malpractice and/or errors and omissions insurance; Obligation to meet certain performance measurements/benchmarks, service levels, quality requirements and/or specific time frames; Obligation to meet certain information security requirements; Obligation to conduct background screening on personnel; Obligation to maintain certain records or data for a minimum amount of time, and allow the company an opportunity to audit such records or data; and, Obligation to maintain business continuity, recovery and contingency plans. Responsibilities for providing/receiving information and communications; Fees, costs and compensation; Intellectual Property rights, ownership and licenses; Indemnification and Limits of Liability; Dispute Resolution; Default and Termination
- Please attach a sample vendor/subcontractor agreement evidencing the above terms and conditions.
- Please explain how the company verifies its adherence to the above provisions/obligations in its agreement.
- Please attach any documents showing the due diligence conducted in connection with the selection and ongoing monitoring of any key vendor/subcontractor to the company.
- Has the company conducted an audit of any of its third party vendors within the past 2 years?
- Please provide the names of the companies that were audited, the type and scope, and the specific processes or items covered as well as any negative findings and any corrective actions suggested by your company and/or taken by your third party vendor company. You may upload responsive documents in the next question.
- Does the company, or any company employee, owner, principal or individual affiliated with the company have any relationship, financial or otherwise with any of the company's vendors or subcontractors or any its employees, owners, or principals?
- Please explain or describe the relationship.
- With the last 12 months, has the company conducted a "fees and costs" analysis evidencing the reasonableness of the fees and costs of its vendors which are passed through to any GSE's?
- Do any of the company's third party vendors have access to client systems, data or processing facilities?

## Data and Information Security, Privacy Protection, Business Continuity and Information Technology

- Does the company have in-house technical expertise or readily available technical support?
- Do any single points of failure exist on the company's network?
- Are network devices redundant throughout the company's network?
- Are up-to-date network diagrams maintained and restricted?
- Does the company use a private IP addressing scheme?
- Is unbound transmission media (e.g. radio, Satellite, WAP, etc.) used to transfer sensitive information?
- Does the company have multiple data centers/locations?
- Does the company have any written policies/processes related to infrastructure change management?
- Please attach any policies/procedures related to infrastructure change management.
- Are there standardized forms for changes and requests?
- Does the company have or use a development network or environment separate and apart from its production environment?
- Does the company use mechanisms to test and certify systems or applications before installing them in the production environment?
- Is there a process for emergency changes?
- Are automatic alerts generated when critical systems become unavailable?
- Does the company have a process in place to perform follow-up and root cause analysis for system outages?
- Does the process include a way to implement permanent fixes for known problems?
- Does the company have a mechanism in place to track outages and production issues?
- Is there a single point of contact or department that can answer questions related to system outages or perform follow up on behalf of each client?
- Does the company have intrusion detection systems installed at all critical junctures of the network?
- Does the company retain raw log files for a minimum of 1 year?
- Does the company maintain a current and accurate network diagram?
- Does the company have SPAM filtering implemented on all mail servers?
- Does the company review firewall and router rule sets every six months?
- Is network access restricted to only approved or company supplied devices?
- Does the company deploy mainstream anti-virus (AV) software on commonly affected systems which is kept current (updated) and are generating audit logs?
- Can AV be disabled by an unauthorized party?
- Does the company have a continuous process that is used to identify and remedy vulnerabilities, in a timely manner, on all assets both prior to and after deployment into production?

## Strictly Confidential

- Does the company have a comprehensive process for requesting, approving, granting, modifying and removing accesses and specific privileges to all systems and data?
- Does the company prohibit the use of shared or generic accounts?
- Does the company assign all users a unique ID, and are the users prohibited from sharing their user names and passwords?
- Does the company use two-factor authentication for all remote access (network-level access originating from outside the network) to the network by employees, administrators, and third parties?
- Does the company immediately revoke access for any terminated users and remove inactive user accounts every 90 days?
- Are all passwords required to be of a minimum length & complexity, i.e. at least eight alpha / numeric & special characters?
- Does the company require that all passwords be changed every 90 days and that they cannot be the same as the last 4 passwords used?
- Does the company enforce a 30 minute lock out period after 6 failed login attempts?
- Does the company require users must re-enter the password, if a session has been idle for more than 15 minutes?
- Does the company restrict access to the master cryptographic keys to the fewest number of custodians necessary and are these keys securely stored and distributed?
- Are all cryptographic keys changed on a regular basis & does the company have a process to replacing keys suspected of being compromised?
- Does the company encrypt laptop hard drives that contain client data with whole disk encryption?
- Does the company use encryption to render all restricted and confidential information unreadable while at rest (for example in databases, on portable digital media, backup media, in logs, on laptops etc.), and while in transit?
- Does the company encrypt all non-console administrative access using SSH, VPN, or SSL/TLS for web based management and other non-console administrative access?
- Does the company control and monitor access to all locations that contain restricted and confidential information?
- Does the company require personal firewall software on any mobile and/or employee- owned computers with direct connectivity to the Internet (for example, laptops used by employees), which are used to access the organization's network?
- Does the company have acceptable use policies for critical employee-facing technologies (for example, remote-access technologies, wireless technologies, removable electronic media, laptops, personal data/digital assistants (PDAs), e-mail usage and Internet)?
- Does the company maintain a comprehensive centralized Inventory of all assets within the company's environment and to whom those assets have been issued or who is responsible for the management of those assets?
- Has the company established a process to ensure that before any access to Restricted or Confidential data is granted to any 3rd party, that the 3rd party is vetted appropriately (i.e. that

## Strictly Confidential

the necessary legal agreements have been signed, that the purpose and scope of the access / data sharing is understood and approved), that the risks are known and accepted or remediated)?

- Does the company build and maintain comprehensive data maps and data flow diagrams that detail where all restricted and confidential data (NPI, PII etc.) resides at rest and flows within the company's environment?
- Is the company PCI compliant?
- Does the company destroy or erase media containing restricted or confidential data when it is no longer needed for business or legal reasons?
- Does the company have a comprehensive incident response program?
- Please attach all of the company's Information Technology and Security policies and procedures, including those responsive to any of the foregoing IT related questions.
- Does the company have written standards, policies, processes or procedures that ensure confidential and restricted information is collected, used, stored, transmitted, shared and destroyed securely (Data Privacy and Protection)?
- Does the company have current, written business continuity/disaster recovery plans, policies, processes or procedures?
- Does the plan include a schedule of required tests?
- Do physical security and environmental controls exist in the building and data center which house client systems or data?
- Please describe the security for each of the company's server rooms (e.g., fasteners, mag locks, cameras, etc.). You may upload responsive documents in the next question.
- Are there firewalls in use for both internal and external connections?
- Does the company have a removable media policy or program (CDs, DVDs, tapes, disk drives)?
- Is consumer/customer data that can be classified as non-public information (NPI), personally identifiable information (PII), or sensitive customer financial information transmitted, processed or stored by the company on behalf the client?
- Please describe the type of data and how and where it is stored or transmitted.
- Is such data transmitted to or received from countries outside the United States?
- Does the company utilize Cloud Services?
- Is the company capable of segmenting and separating client data?
- Is customer data encrypted?