

Supplier Code of Conduct

Intent

Stewart Information Services Corporation and its affiliates ("Stewart Title") are committed to conducting its business in an ethical, legal, and socially responsible manner. Stewart Title expects its suppliers to share this commitment and, therefore, has established this Supplier Code of Conduct. Although there may be different legal and cultural environments applicable to its suppliers, suppliers must meet the following minimum requirements to do business with Stewart Title:

1. Compliance with Laws, Regulations, and Published Standards

Suppliers must comply with all laws, codes, or regulations of the countries, states, and localities in which they operate. This includes, but is not limited to, laws and regulations relating to environmental, occupational health and safety, and labor practices. In addition, Stewart's suppliers must require their suppliers (including temporary labor agencies) to do the same. Suppliers must adapt their practices to any published standards for their industry.

2. Environmental Practices

Suppliers shall comply with all environmental laws and regulations applicable to their operations worldwide. Such compliance shall include the following items:

- Monitoring, controlling, and treating discharges generated from operations
- Obtaining and maintaining environmental permits and timely filing of required reports
- Proper handling and disposition of hazardous materials.

3. Occupational Health and Safety Practices

Suppliers shall provide their employees with a safe and healthy working environment to prevent accidents and injury to health arising out of, linked with, or in work or because of the operation of the supplier. Suppliers shall provide:

- A system for injury and illness reporting
- Clean and safe facilities
- Medical treatment and/or compensation to injured/ill workers arising because of working for supplier
- Occupational health and safety training.

4. Labor Practices

Stewart Title expects its suppliers to adopt sound labor practices and treat their workers under applicable laws and regulations. In addition, suppliers must comply with the following standards:

- Minimum Wages. Suppliers shall provide wages for regular and overtime work and benefits that meet or exceed applicable legal requirements.
- No Discrimination. Suppliers shall not discriminate in its employment practices on the basis of race, color, religion, sex, age, physical disability, national origin, creed, or any other basis prohibited by applicable law.
- Treatment of Employees. Suppliers shall treat each employee with dignity and respect. Supplier's workers shall not be subject to threats of violence, physical punishment, confinement, or other form of physical, sexual, psychological, or verbal harassment or abuse.
- Working Hours. Suppliers shall not require workers to work more than the maximum hours of daily labor set by applicable laws.

5. Ethical Business Practices

Stewart Title expects its suppliers to conduct their businesses under the highest standards of ethical behavior and under applicable laws and regulations. Suppliers are expected to conform to these requirements in each of the following areas:

- Fair Trade Practices. Suppliers shall not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of antitrust laws or other applicable laws.

- Bribery, Kickbacks, and Fraud. No funds or assets of the supplier shall be paid, loaned, or otherwise disbursed as bribes, kickbacks, or other payments designed to influence or compromise the services performed for Stewart Title.
- Foreign Corrupt Practices Act. While laws and customs vary throughout the world, all suppliers must comply with foreign legal requirements, United States, and local laws that apply to foreign operations, including the Foreign Corrupt Practices Act. The Foreign Corrupt Practices Act makes it unlawful to give anything of value to foreign government officials, foreign political parties, party officials, or candidates for public office to obtain or retain business.
- Stewart Title Policies and Procedures. Suppliers must comply with Stewart Title's policies and procedures available on www.stewart.com.
- Intellectual Property Rights. Suppliers shall respect the intellectual property rights of others, especially Stewart Title, its affiliates, and business partners. Suppliers shall safeguard and maintain confidential and proprietary information of Stewart Title and shall use such information only for the purposes specified for use by Stewart Title. Suppliers shall observe and respect all Stewart Title patents, trademarks, and copyrights, and comply with all requirements on their use as established by Stewart Title.
- Confidential Information. Suppliers shall not store personal non-public information or transmit confidential or proprietary information of Stewart Title via the Internet unless such information is encrypted under minimum standards established by Stewart Title. Encryption will secure any sensitive information transferred to or from the hosted system over the Internet. All such sensitive information will be encrypted with industry accepted strong encryption algorithms when stored in structured or unstructured areas. Stewart Title prefers AES 256, if configurable.

6. Export Sanctions/Terrorism Activities

Suppliers must abide by all economic sanctions or trade embargoes that the United States has adopted, whether they apply to foreign countries, political organizations, or particular foreign individuals and entities.

Suppliers shall not directly or indirectly engage in or support any terrorist activity. Suppliers, their affiliates, and any officer or director of the supplier and affiliates shall not be included on any lists of terrorists or terrorist organizations compiled by the United States government or any other national or international body, including but not limited to:

- The U.S. Treasury Department's Specially Designated Nationals List
- The U.S. State Department's Terrorist Exclusion List
- The United Nations List Pursuant to Security Council Resolution 1390 (2002) and Paragraphs 4(B) or Resolution 1267(1999) and 8(C) of Resolution 1333 (2000)
- The European Union List Implementing Article (2)(3) of Regulation (EC) No. 2580/2001 on Specific Restrictive Measures Directed Against Certain Persons and Entities with a View to Combating Terrorism.

7. Solicitations by Suppliers

All suppliers shall comply with all guidelines issued by Stewart Title relating to access to Stewart Title data, facilities, offices, and employees. No supplier shall use Stewart Title's computer system, including its electronic mail system and internet site, to send unsolicited electronic mail messages to the Stewart Title community. Suppliers must receive prior written authorization from Stewart Title's Procurement Department to hold trade shows, demonstrate products, utilize Stewart Title resources, or make unsolicited calls on Stewart Title personnel.

8. Monitoring and Compliance

Suppliers shall conduct audits and inspections to ensure their compliance with this Supplier Code of Conduct and applicable legal requirements. If a supplier identifies areas of non-compliance, the supplier shall notify the Procurement Department of its plans to remedy any such non-compliance.

Stewart Title or its representatives may engage in monitoring activities to confirm supplier's compliance to this Supplier Code of Conduct, including on-site inspections of facilities, use of questionnaires or report cards, review of publicly available information, or other measures to assess supplier's performance.

Any Stewart Title supplier that learns of violations of this policy must notify EthicsPoint at (866) 384-4277 or at www.ethicspoint.com. The reporting tool is staffed by our vendor partner, EthicsPoint, guarantying anonymity. Stewart Title reserves the right to conduct supplier compliance audits each year using both internal personnel and auditors. Notwithstanding any term or condition found in an agreement between Stewart Title and the supplier,

Stewart Title reserves the right to disqualify any potential supplier or terminate any agreement with any supplier found to violate this Supplier Code of Conduct without liability to Stewart Title.

Application/Exclusions

This Supplier Code of Conduct is a general statement of Stewart Title's expectations regarding suppliers. This policy should be read to include any supplier obligations as set forth in any:

- Request for proposal or other solicitation;
- Agreements by and between Stewart Title and the supplier. If a conflict arises between this policy and any Stewart Title solicitation document or applicable agreement, the Stewart Title solicitation or agreement shall control, but only by referencing and superseding this policy.

No exclusions apply to this policy unless approved in writing by the Stewart Title's Corporate Controller.