



INTEGRITY IS AT HOME HERE

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A MESSAGE FROM OUR CEO

At Stewart, we are committed to becoming the Premier Title Services Company. That is the mission and vision that unites and drives our people every day to uphold our reputation, serve our customers with excellence and remain open to new thinking that fuels innovation.

Our success over the past 130-plus years has been built on a foundation of values and principles that we call our Stewart DNA. These are the attributes we hold ourselves and each other to, ensuring that we operate with the highest standards of integrity, responsibility and respect.

As you review our Code of Business Conduct and Ethics, understand it is not only a reflection of our past but a blueprint for how we will continue to thrive in the future. It is our commitment to

always doing the right thing and maintaining the highest ethical standards and practices in all aspects of our work, protecting our people and serving our customers.

In following our Code, we are ensuring integrity is at home here by reinforcing our reputation for honesty, fairness and trustworthiness that our customers expect. We encourage our employees to speak up without fear of retaliation or retribution. Our integrity has made us a trusted name in the title industry for more than a century.

A handwritten signature in black ink, appearing to read 'Fred Eppinger'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Fred Eppinger
Stewart CEO

OUR CULTURE AND VALUES

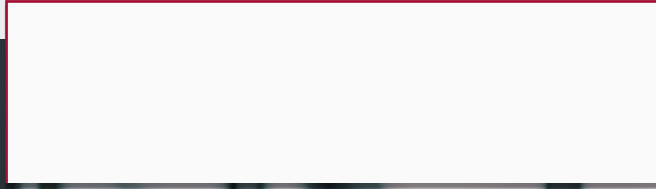
Founded in 1893 and based in Houston, Texas, Stewart Information Services Corporation is a customer-focused, global title insurance and real estate services company. We also provide loan-related and insurance services as well as property information and technology to streamline the real estate process.

Integrity is at home here. Acting with integrity is what we expect of everyone working for or with Stewart. It's a key part of our success and serves as the foundation of our reputation and trustworthiness. Our commitment to our customers and to protecting property ownership around the world begins with maintaining core values that make us the Premier Title Services Company.

Click each Value for more information



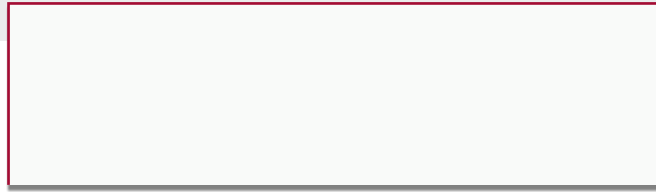
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WE ARE ACCOUNTABLE

We are accountable for our actions and decisions. This means:

- ▶ We understand and carry out our responsibilities under our Code.
- ▶ We are open and transparent.
- ▶ We act like business owners.
- ▶ We take responsibility for outcomes and performance.
- ▶ We deliver on our promises.
- ▶ We learn from our mistakes.



OUR CODE OF CONDUCT

Our Code of Conduct is Stewart's commitment to ethical and legal conduct. It sets our expectations for conduct when acting on Stewart's behalf.

We want everyone to know that Stewart takes ethics and the law seriously, and we expect the same of anyone who works for us or on our behalf. By championing compliance, we maintain the trust of our customers, investors, business partners and other stakeholders.

We use our Code as a:

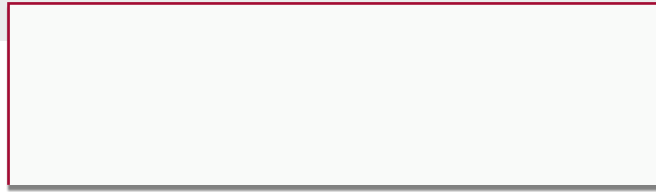
- ▶ **Guide** for acting ethically and legally
- ▶ **Reference** for ways to report concerns or violations, or where to get advice
- ▶ **Learning tool** for understanding expectations and our responsibilities at Stewart

Our Code applies globally to every employee, officer and director of Stewart Information Services Corporation, Stewart Title Guaranty Company, Stewart Title Company and members of the Stewart family of companies (collectively "Stewart"). The relationship each of us has with Stewart depends on following it. We also expect our vendors, service providers, subcontractors, and sub-tier suppliers to comply with the Stewart Supplier/Vendor Code of Conduct.



Our Code applies to conduct that relates in any way to, or may directly or indirectly reflect on or affect, Stewart's business, reputation, employees, customers, vendors or competitors, or that identifies our affiliation with Stewart, no matter the location. This includes working remotely from home or elsewhere, traveling for business, during company social functions or at business dinners and the like. As representatives of Stewart, we should always be aware of how we are presenting ourselves publicly, even when we are not acting in an official capacity. Our Code should drive both our public and private conduct, especially if our actions could reflect poorly on Stewart.

Our Code is administered by the Chief Compliance Officer and may be amended or modified at any time by the Board of Directors. Any waivers of our Code for executive officers or directors may be made only by the Board of Directors or a committee of the Board of Directors.



Everyone's Responsibilities

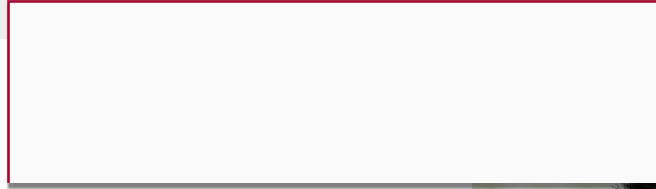
Regardless of our position, function or location, we all must:

- ▶ **Review and understand** our Code
- ▶ **Comply with our Code** and all applicable Stewart policies, as well as all applicable laws and regulations, and report any suspected violations
- ▶ **Follow the laws and regulations of our localities**, and notify a Compliance Officer at ethics@stewart.com if they seem to conflict with our Code or our policies

Unique Responsibilities of Managers

Our managers must:

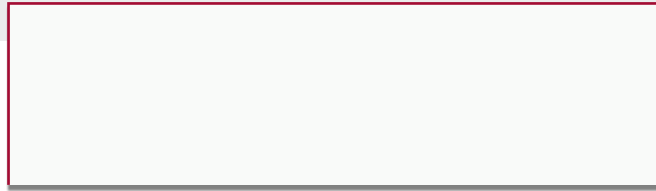
- ▶ **Serve as a role model** for conduct that complies with our Code and aligns with our values
- ▶ **Help ensure compliance** among direct and indirect reports by encouraging them to raise concerns and ask questions. Remind them not to fear retaliation for good faith reports.
- ▶ **Ensure that all team members complete required trainings** on our Code and policies, and review with them any policies and procedures that apply to their roles



CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with our Code or policies can result in discipline, up to and including termination of employment. If the incident is also a violation of the law or regulations, it could lead to civil or even criminal penalties.





WE MAKE ETHICAL DECISIONS

If you are uncertain about a decision or action, ask yourself would it:



Violate the Code or
any of our policies?



Violate any applicable
laws or regulations?



Result in improper influence
or unfair advantage?



Be contrary to Stewart's
best interests?



Cause you or Stewart
reputational harm?



Cause harm to others or
the environment?



Be dishonest or cause others
to distrust you if revealed?



Lead others to question your
judgment or reconsider
working with you or Stewart?

If the answer to any of these questions is **“yes,”** take a step back and reconsider the action or decision. Then seek the guidance of a manager, a Compliance Officer (ethics@stewart.com) or the Legal Department (compliance@stewart.com), or raise your concern through EthicsPoint at (866) 384-4277 or www.ethicspoint.com (anonymously, if preferred).



ETHICS AND COMPLIANCE AT STEWART

Stewart's ethics and compliance program involves a structured approach that promotes legal and ethical conduct across the organization. The framework includes these elements:

- ▶ **Oversight:** The compliance committee, composed of representatives from various business units and departments, meets quarterly to discuss and address relevant topics.
- ▶ **Code of Conduct and Policies:** A well-defined Code of Conduct and related policies cover a wide range of compliance topics, including conflicts of interest, antitrust, insider trading and data security.
- ▶ **Education and Training:** The program emphasizes continuous education and training for employees to ensure understanding and compliance.
- ▶ **Enforcement Mechanisms:** These include investigative procedures and resources for monitoring, auditing and reporting, as well as disciplinary and response prevention measures.



Among the compliance program's primary goals is fostering a strong ethical and law-abiding culture to attract talent and retain our employees. Another focus is minimizing reputational, financial, legal and regulatory risks, while adding shareholder value by promoting integrity.

The program emphasizes continuous improvement, which may include policy and Code of Conduct updates, as well as risk assessments that measure the program's effectiveness.

We
Speak Up



WE SPEAK UP



HOW TO REPORT CONCERNS

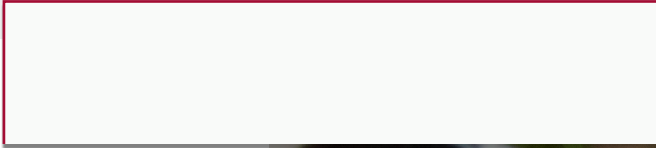
We speak up against disrespectful, unethical or unlawful conduct without fear of retaliation. Stewart takes all reasonable steps to investigate suspected misconduct and does not tolerate retaliation against those who do speak up in good faith.

We report violations, or suspected ones, whether they may have been committed by colleagues, supervisors, officers, directors, vendors, contractors, consultants, customers or anyone else who has a business relationship with Stewart. We consult with a Compliance Officer if we have any questions or concerns regarding a Code-related matter.

Available reporting resources include:

- ▶ Human Resources or any member of management
- ▶ A Compliance Officer at ethics@stewart.com
- ▶ Legal Department at compliance@stewart.com
- ▶ EthicsPoint at (866) 384-4277 or www.ethicspoint.com (anonymously, if preferred)

To the fullest extent possible, Stewart will protect the privacy and confidentiality of everyone involved in any investigation.



WHAT HAPPENS WHEN WE REPORT AN ISSUE?

Stewart investigates suspected violations of our Code or policies as appropriate and necessary. Everyone involved must cooperate fully with any internal or external investigation.

Reporting a violation does not mean that one has occurred. The company investigates each concern and acts as appropriate. We keep our investigations as confidential as possible, and only share information on a need-to-know basis.



WE DO NOT TOLERATE RETALIATION

We do not tolerate retaliation against anyone for speaking up or reporting concerns or violations in good faith. Our “no retaliation policy” extends to investigations and all other legally protected activities.

Why It Matters

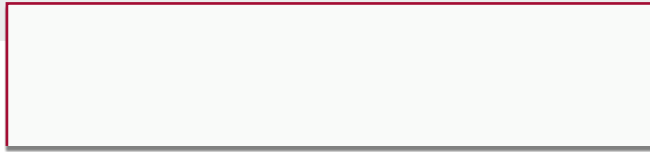
Everyone should feel free to speak up in good faith without the fear of punishment. Having a strong policy against retaliation helps us uphold the values of our Code by encouraging each other to speak up.

Bringing It Home

We avoid retaliation when we:

- ▶ **Do not treat** those who speak up or engage in other protected activity any differently than before
- ▶ **Report** retaliation that we experience or suspect may be taken against someone else
- ▶ **Recognize** that speaking up is at times necessary, and support the processes to handle possible Code violations even when we disagree that they have occurred





Building Our Understanding

- ▶ **Retaliation** means treating someone differently after that person has engaged in a protected activity, like reporting concerns or violations in good faith or participating in an investigation. An act of retaliation may be severe and obvious, such as demoting someone or terminating their employment. It may also take subtler forms, such as issuing undesirable assignments or inaccurate reviews or keeping the person out of meetings or training sessions.
- ▶ **Good faith** means that an accusation or report is made because the person sincerely believes a violation or something inappropriate has occurred. The person may turn out to be wrong about the facts or that the conduct was a violation, but so long as the report was honest, it's in good faith.

Know the Code

Question: Ever since one of our colleagues reported a suspected violation, my team has been divided over the issue. Some team members refuse to cooperate with them and have tried to make things difficult for them because the coworker made the report. Could this be retaliation?



Resources

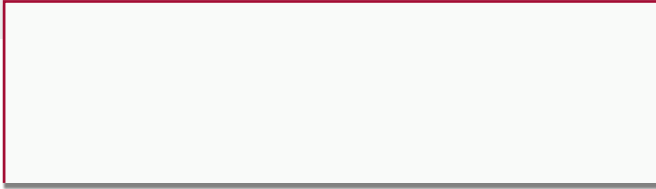
Stewart Employee Policies



WE VALUE OUR PEOPLE

This is how we show we value our people:

- ▶ Treat each other with respect and dignity.
- ▶ Look out for each other so the work environment is safe and healthy.
- ▶ Ensure the working conditions are fair and meet or exceed legal standards.



WE EMBRACE INCLUSION AND BELONGING

We are committed to an inclusive workplace that fosters a deep sense of pride, passion, respect and belonging.

Why It Matters

Inclusive workforce practices help us to cooperate with each other more effectively. They can also make us understand our customers better and serve them more effectively.

Bringing It Home

Inclusive workforce practices include:

- ▶ **Recruiting** from a broad spectrum of potential candidates
- ▶ **Providing equal opportunity** in hiring and promotion
- ▶ **Using inclusive** approaches to team building, professional development and social events
- ▶ **Fostering a sense of belonging** among all team members and maximizing the value of diverse talents and life experiences

Building Our Understanding

We foster inclusion and belonging in these ways:

- ▶ **Openness** – We regard our workforce’s diverse backgrounds and life experiences as assets to learn about and grow from, rather than as obstacles to overcome. We welcome diversity among our colleagues and customers alike.

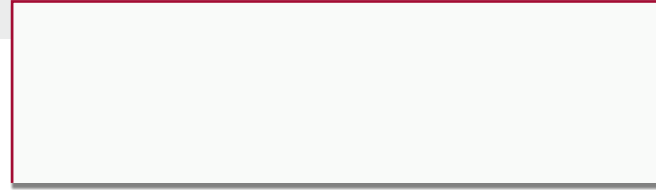
- ▶ **Language and Culture** – In our communications, we are mindful about including people’s various cultural backgrounds, familial relationships and gender identities. This includes using people’s preferred pronouns and taking care to pronounce names correctly.
- ▶ **Accommodation** – We provide reasonable accommodation, for example, to persons with disabilities and for religious practices, military obligations, pregnancy and lactation.

Know the Code

Question: A coworker asked for time off to observe a religious holiday not marked on the official company calendar. Does this mean we cannot honor their request?



Resources
[Sustainability](#)



WE PREVENT HARASSMENT, DISCRIMINATION AND BULLYING

We do not tolerate any form of unlawful discrimination, harassment or bullying.

Why It Matters

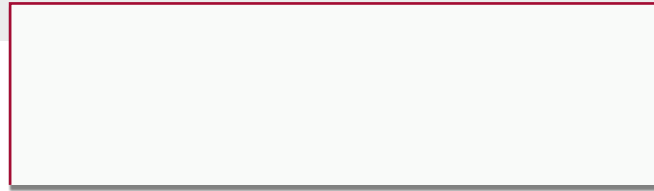
Workplace discrimination and harassment based on certain personal characteristics are typically illegal everywhere we have operations. Keeping this kind of conduct, as well as bullying, out of the workplace is essential to maintaining cooperative and productive work environments.

Bringing It Home

We avoid discrimination, harassment and bullying when we:

- ▶ **Respect** each other and anyone outside Stewart
- ▶ **Care** about how our actions affect others
- ▶ **Appreciate** the value of differing perspectives
- ▶ **Support** each other by calling out conduct that is uncivil or uncooperative





Building Our Understanding

Here are a few terms that we should know:

- ▶ **Protected characteristics** – These are characteristics that, by law in various places, are protected against discrimination. They typically include race, color, national origin, religion, sex, gender identity or expression, sexual orientation, marital status, age and disability.
- ▶ **Discrimination** – This refers generally to employment actions or decisions that are based on a protected characteristic, such as firing someone because of their sexual orientation, age, disability and the like.
- ▶ **Harassment** – This is any kind of unwelcome conduct based on any protected characteristic that could make the work environment hostile to a person. Whether the conduct is considered harassment depends on the effect it has on the other person regardless of anyone's intentions.
- ▶ **Sexual harassment** – This is any kind of unwelcome conduct that is sexual in nature, such as unwanted romantic attention or sexual displays or gestures. It also includes requests for sexual favors in exchange for employment benefits.
- ▶ **Bullying** – This is abusive or hostile conduct that is not necessarily tied to a protected characteristic. It includes humiliation, intimidation or spiteful conduct done for any reason.

Know the Code

Question: Our team is drafting a list of interview questions for job candidates. Some team members say the list contains questions that are inappropriate, such as those that ask whether the candidate is married or has children and where the person grew up. Is there anything wrong with these questions?



Resources

Stewart Employee Policies

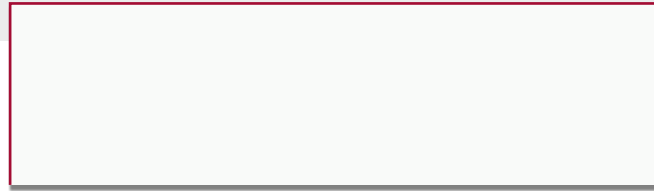


WE KEEP OUR WORKPLACES SAFE, HEALTHY AND SECURE

We keep our workplaces safe by looking out for each other and taking care of our health and well-being.

Why It Matters

Safety, health and well-being are the foundation of a productive and creative work life. Whether we are working from home or from the office, staying healthy plays an essential role in helping us carry out our daily operations.



Bringing It Home

We look after the safety, health and well-being of ourselves and each other by:

- ▶ **Following safety procedures** for any work that may involve a hazard
- ▶ **Reporting injuries and hazards** to mitigate risks and avoid future injuries
- ▶ **Staying home** when we have a contagious illness and taking care of ourselves for quick recovery
- ▶ **Getting help** when we may be struggling with mental illness or an addictive substance, which may include alcohol or drugs, whether illegal or legally prescribed
- ▶ **Reporting substance use** that presents a hazard, such as alcohol or illegal drug use on the job or taking drugs that we have been prescribed whose use may nevertheless present a safety hazard for carrying out specific job duties
- ▶ **Reporting threats of violence** to Security, including verbal threats, the appearance of weapons, or any other conduct that may signal aggressive or violent intentions



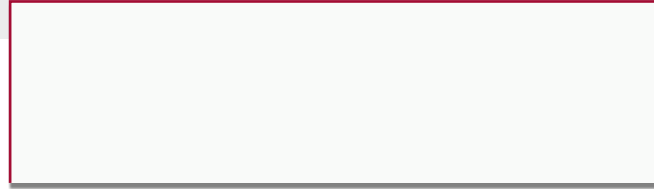
Resources

Stewart Employee Policies



Know the Code

Question: A coworker has been making aggressive remarks and recently mentioned something about bringing a weapon to work. Should I tell someone, even if it seems like they might just be venting?



WE ENGAGE IN FAIR LABOR PRACTICES

We comply with all applicable labor laws and care about the well-being of our employees. We pay fair compensation in compliance with the law.

Why It Matters

Fair compensation and good working conditions help motivate and retain our workforce and keep the workplace safe and healthy. We also must comply with the various laws we're obliged to uphold in this area.

Bringing It Home

Stewart engages in fair labor practices by:

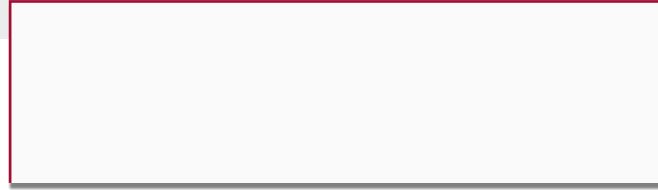
- ▶ **Keeping track of working hours** for non-exempt employees and compensating for overtime in accordance with the law
- ▶ **Providing lunch and other breaks** as required and not allowing work during these times
- ▶ **Providing sufficient training and equipment** to do our work properly and safely
- ▶ **Avoiding excessive working hours** that can jeopardize employee health and cause burnout
- ▶ **Allowing for paid time off** for illness or vacation



Building Our Understanding

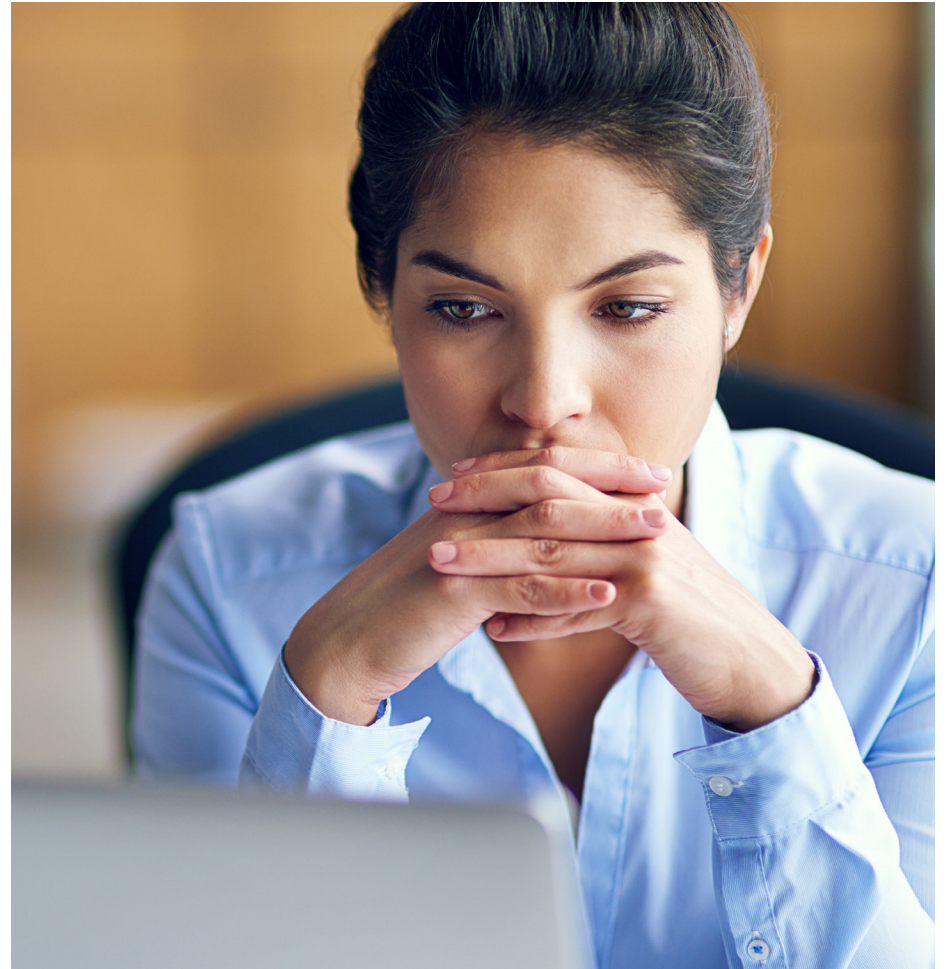
Here are a few terms to understand:

- ▶ **Non-exempt and exempt employees** – These are recognized categories of employees under U.S. federal law. We have special obligations for non-exempt or “hourly” employees that do not apply to exempt ones paid on a salary. These obligations include keeping track of hours worked and paying extra for time that exceeds a certain number of hours. These amounts may vary under state law in the U.S. Other countries where we have operations typically have similar laws that may use different terms. Please check with your local HR representative to understand how these laws might apply to you.
- ▶ **Excessive hours** – The number of hours worked is considered excessive when it becomes a health hazard or when the drawbacks of increasing attention to work start to outweigh the benefits. Everyone needs breaks during the day for eating and rejuvenation as well as time off for illness, vacation and general downtime away from work, including time away from work communication devices outside the office.



Know the Code

Question: A colleague of mine on another team says that their team is consistently pressured to work through lunch, even those who are non-exempt. Non-exempt employees are expected to answer emails or texts on evenings and weekends. They have almost no downtime outside of sleep and are considering quitting. They're afraid to complain, though. Should I speak up?



Resources

Stewart Employee Policies

WE SERVE OUR CUSTOMERS

We serve our customers with integrity,
which means that we:

- ▶ Compete by offering the best possible service and solutions
- ▶ Avoid unfair advantages or improper influences
- ▶ Engage in honest and trustworthy business practices
- ▶ Interact with government officials legally



WE PREVENT BRIBERY AND CORRUPTION

We do not tolerate any forms of bribery or corruption.

Why It Matters

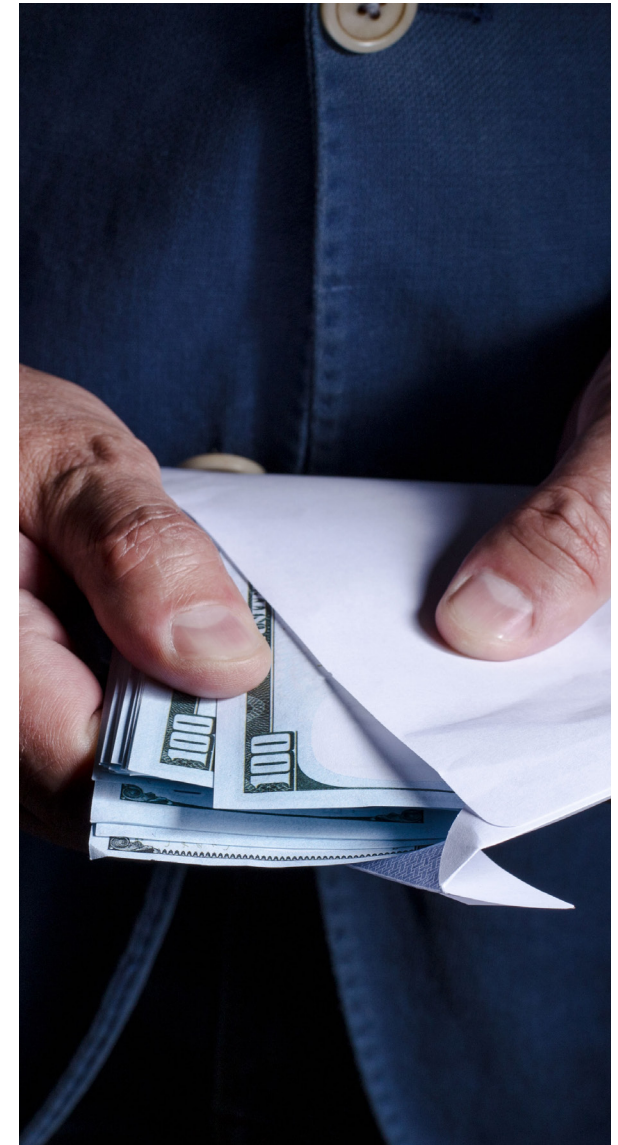
Bribery and corruption can damage our reputation beyond repair. If we allow these to become part of our business practices, either directly or through our partners, our customers may lose trust in our ability to provide superior services or they may stop doing business with us. Bribery and corruption are also serious crimes with severe penalties in most countries.

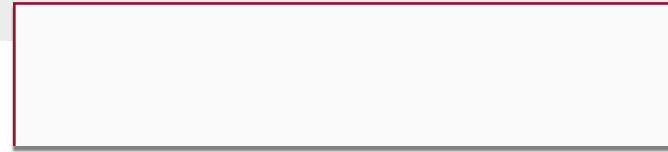
Bringing It Home

We avoid bribery and corruption, following internal accounting controls to ensure the accuracy of our financial statements and **not**:

- ▶ **Giving improper payments** of any kind from Stewart to employees, agents, consultants, professionals or vendors
- ▶ **Misusing funds**, such as escrow funds, or converting funds for personal use
- ▶ **Charging improper fees**, including kickbacks and referral fees or unearned fees
- ▶ **Giving recommendations** to our customers. If asked to recommend an external service provider, such as an accountant, lawyer or real estate agent, we may provide a list of providers but may not recommend any particular one.
- ▶ **Making public endorsements** on Stewart's behalf without the approval of the Chief Compliance Officer.

If we discover any non-compliance with the above, we [report it](#) promptly.





Building Our Understanding

Below are some terms that we should know:

Improper payments – Examples include any payment:

- ▶ For services not needed, not ordered or not supported with documentation
- ▶ Of payroll-related expenditures, bonuses, commissions, awards and noncash gifts given to or by employees without proper approval and documentation
- ▶ Made in cash or with checks drawn on or payable to “Cash” or “Bearer”
- ▶ Made for any reason other than a legitimate business purpose described in supporting documentation
- ▶ Made directly or indirectly to employees of policyholders, customers or vendors, or that appears to be outside of normal business
- ▶ To or from an entity in which an employee or someone close to the employee has an undisclosed interest

Misusing funds includes acts such as:

- ▶ Using escrow funds for any purpose other than as provided in authorized instructions given by the parties to the transaction and received by Stewart
- ▶ Converting Stewart funds or those of a third party being held by Stewart to or for personal use

Kickbacks and referral fees are improper. We must not give or accept a kickback, fee or anything else of value in exchange for referrals of settlement service business. Although settlement service providers may provide discounts or similar incentives to do business with Stewart if permitted by state law, they **must not** offer or give business gift certificates, prizes (such as a chance to win a trip) or even inexpensive items in exchange for referrals. Regulators may view as an illegal referral fee any amount paid to a referral source above fair market value for a service or product (such as renting office space from a broker or lender at above-market rates or paying a disproportionate share of joint advertising). Consult with a [Compliance Officer](#) if you have any questions about what is legally permitted.

Unearned fees are improper. We must not pay fees, split fees or receive fees for services not actually performed. Examples include the following:

- ▶ A borrower may not be charged a fee for sending documents via courier when the borrower personally picked up the documents.
- ▶ A title agency that does not perform the usual agency tasks, such as examination of title, cannot be paid its usual fee.

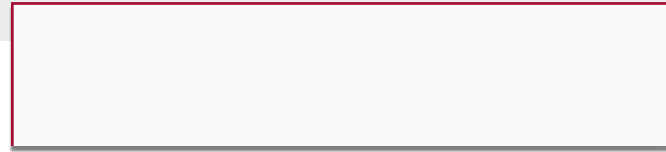
Truth in Lending Act-Real Estate Settlement Procedures Act Integrated Mortgage Disclosures – These disclosure requirements apply to all closed-end consumer mortgage loans secured by real property purchased primarily for personal, family or household purposes. These include construction loans, loans on 25 acres or more of vacant land or single-family residence loans. We must preserve and retain evidence of compliance with this rule in the files of the title insurance company, direct operation or title insurance agencies.

State Laws – Certain states may have rules that go beyond the federal requirements for mortgage disclosures. For questions about state laws governing settlement practices, contact any [reporting resource](#).

Know the Code

Question: A real estate agent wants to leave their business cards at my office for customers to take if they are interested. Is this OK?





WE CONDUCT INTERNATIONAL BUSINESS WITH INTEGRITY

We do not support boycotts with certain allies of the United States. We do not do business with individuals, entities or countries that have troubled relations with the United States and are under U.S. sanctions.

Why It Matters

Anti-boycott laws promote fair trade with countries allied with the United States, and trade sanctions help control serious international crimes like terrorism and drug and human trafficking. Violations of these laws can lead to severe civil fines and criminal penalties. Crucial business licenses and permits needed for our operations may also be revoked if we violate these laws.

Boycott activity request. We refer any requests to engage in the above to one of our [reporting resources](#).

Trade sanctions compliance. We do not do business of any kind with any governments, countries, regions and organizations, nor any individuals, groups and entities listed under U.S. trade sanctions lists.

Due diligence. We screen potential business partners before doing business with them to ensure they are not barred under trade sanctions.

Stay current. We stay current with U.S. sanctions to ensure that any individuals, businesses or countries with whom we do business have not come under U.S. sanctions.



Bringing It Home

Anti-boycott compliance. We **do not** take actions or enter agreements that could lead to violations of U.S. anti-boycott laws, such as:

- ▶ **Refusing to do business**
 - With or in a boycotted country
 - With nationals or residents of a boycotted country
- ▶ **Discriminating against** other persons based on race, religion, sex, national origin or nationality
- ▶ **Furnishing information** about:
 - Business relationships with or in boycotted countries
 - The race, religion, sex or national origin of another person
 - Business relationships with blacklisted companies or with blacklisted persons
- ▶ **Implementing letters of credit** containing prohibited boycott terms or conditions



Building Our Understanding

The **U.S. Office of Foreign Assets Control (OFAC)** administers and enforces economic and trade sanctions against countries, regimes and individuals involved in terrorism, narcotics or other illegal activities.

Specially Designated Nationals and Blocked Persons List/Foreign Sanctions Evaders Lists are kept by OFAC to enforce U.S. sanctions.

Know the Code

Question: My team is considering doing business with a company based in a country with which we currently have no business. What is my team's obligation here as far as trade sanctions are concerned?



WE COMPETE HONESTLY AND FAIRLY

We compete fairly and deal honestly with customers, suppliers, vendors, competitors and employees. We never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation or any other unfair dealing practices. We comply with all applicable competition laws.

Why It Matters

Competing fairly and complying with competition laws helps to keep a level playing field where we compete through appropriate methods such as higher quality offerings or better pricing, rather than through unfair advantages. This protects everyone by encouraging an innovative marketplace with better products and services at reasonable prices. Violating competition laws can lead to severe civil and criminal penalties against Stewart and any individual involved.



Bringing It Home

We **never** enter or even appear to enter into any agreement or understanding with competitors to:

- ▶ **Fix** or stabilize prices, fees, rates, commissions or other terms of sale, purchase or conditions
- ▶ **Restrict** capacity or output
- ▶ **Refrain** from supplying a product or service
- ▶ **Divide** markets or customers
- ▶ **Exclude** competing firms from the market
- ▶ **Not compete** for the employees of a competitor (known as a “no poach” agreement)

With limited exception, we decide only by ourselves and **do not** discuss with competitors the following:

- ▶ **Prices**, including any pricing submissions to benchmarks or pricing matrices sent to customers
- ▶ **Fees**, spreads, commission rates and terms and conditions
- ▶ **Other matters** of actual or potential competitive significance

Similarly, we make **independent decisions** about matters like:

- ▶ **Markets** or lines of business we will pursue
- ▶ **Customers**, brokers, counterparties and other business partners with whom we engage
- ▶ **Products**, platforms or technologies we will support
- ▶ **Transaction** timing, size or types in which we will participate

Building Our Understanding

- ▶ **Competition laws**, also known as antitrust or free trade laws, aim to protect the marketplace by barring unfair activities, especially competitors entering into agreements or understandings that limit, reduce or eliminate free competition.
- ▶ **Agreements** that are barred by competition laws include any kind of informal agreement or unwritten understanding concerning price or other matters of competitive significance.
- ▶ **Communications with competitors** should be done with great care, whether in person, over the phone or in emails, texts or other electronic communications, to prevent any exchange that could be interpreted as an agreement.

Know the Code

Question: While we’re attending a trade conference, my team goes out for coffee with a group that includes some of our competitors. The conversation flows to the topic of inflation and the pricing of offerings. What should we do?



WE EXCEL IN OUR MARKETPLACE

We excel through fairness and integrity by:

- ▶ Avoiding undue influences and unfair advantages
- ▶ Trading securities without the use of inside information
- ▶ Working only with business partners who share our values

WE AVOID CONFLICTS OF INTEREST

We do not let personal interests get in the way of our decisions and actions on behalf of Stewart. We avoid even the appearance of a conflict of interest.

Why It Matters

Avoiding conflicts of interest and even the appearance of such conflicts helps us make unbiased decisions that benefit our business. Using good judgment allows us to pursue company goals without distraction or divided loyalty. Doing so builds trust with our colleagues, customers, business partners and communities.

Bringing It Home

We avoid conflicts of interest when we:

- ▶ **Recognize** situations where our personal activities or relationships could interfere with making decisions in the best interests of Stewart
- ▶ **Remove** ourselves from situations that could have even the appearance of a conflict of interest
- ▶ **Disclose** all actual or potential conflicts of interest to management, a Compliance Officer at ethics@stewart.com or EthicsPoint at www.ethicspoint.com or (866) 384-4277
- ▶ **Support** the outcome of a conflict resolution



Building Our Understanding

Common conflicts of interest:

- ▶ **Relatives and Friends** – Hiring friends or family members as employees or suppliers
- ▶ **Personal or Family Financial Interests** – Having a significant personal or family investment in a company with which Stewart does business
- ▶ **Corporate Opportunities** – Taking personal advantage of business opportunities we discover through our employment
- ▶ **Outside Employment** – Engaging in outside work that competes with or interferes with our obligations to Stewart

Below are certain rules we must follow to avoid conflicts of interest:

- ▶ **Honoraria** – Speaking at approved events is considered a part of each of our normal job responsibilities. In these situations, however, we must not request or negotiate a fee or receive any form of compensation from the organization that requested the presentation.
- ▶ **Inventions, Books and Publications** – A Compliance Officer must provide written permission before employees may develop any products, software or intellectual property that are or may be related to Stewart’s current or potential business, unless such products are for Stewart.
- ▶ **Affiliated Business Arrangement Disclosures** – Affiliated Business Arrangement Disclosures (known as “AfBA Disclosures”) are required whenever we refer a borrower to a provider of settlement services:
 - In a one- to four-unit residential transaction **and**
 - When Stewart or an employee has an ownership interest of more than one percent in the provider
- ▶ **Board Members** – Members of the company’s Board of Directors also have an obligation to act in the best interests of the company and not based on personal relationships or benefits. To avoid conflicts of interest, directors are required to disclose to the Chief Legal Officer any personal interest they may have in a transaction involving the company and to recuse themselves from participation in any decision in which there is a conflict or potential conflict between their personal interests and the interests of the company.



Know the Code

Question: We are looking for a company to provide employee contracting services. My sibling owns a company that provides this service. Can I hire my sibling’s company?



Resources

[Conflicts of Interest Policy](#)



WE EXCHANGE GIFTS AND ENTERTAINMENT RESPONSIBLY

We do not offer or accept anything of value with the intent to gain, or in exchange for, any favorable treatment. We win business through superior offerings, not improper influence.

Why It Matters

By avoiding improper influences in gift exchanges, we ensure integrity and trust in all business dealings and prevent conflicts of interest. This protects our reputation and allows us to build lasting, ethical relationships with our customers and business partners. Proper use of gifts also aligns our business practices with industry standards and the law.

Bringing It Home

We avoid improper influences by ensuring that gifts, business meals, entertainment and anything of value that we give or receive, directly or indirectly, are:

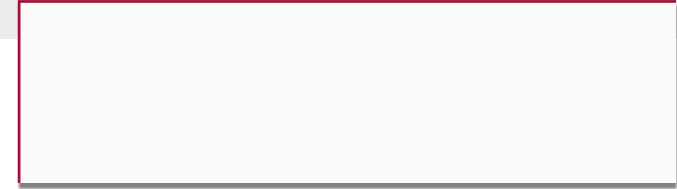
- ▶ In **compliance with all applicable laws** of whatever country we may be in, as well as industry standards
- ▶ **Recorded accurately and transparently** in our financial statements
- ▶ Never in the form of **cash or cash equivalents** (such as a gift card)
- ▶ Never offered or accepted during any **bidding process or contract negotiation**
- ▶ Never offered to or accepted from **government officials**:
 - Without prior approval from the Chief Compliance Officer
 - Including **facilitating payments**
- ▶ Not **excessive or improper**, which means:
 - **Gifts or anything of value** must comply with our policies and applicable law.
 - **Business meals** must serve a legitimate business purpose and not be lavish.
 - **Entertainment** (such as sporting events or concerts) must be infrequent, reasonably priced, directly related to business discussions and in a form that would not embarrass the company.
 - **Stewart employees must be in attendance** at business meals and events.

We make **commission or fee arrangements** only with firms or persons serving as legitimate commercial representatives, agents or consultants under a written contract for fair value, never paid in cash. We do not engage in any such arrangement in which a government official is known to have an interest unless permitted by applicable law and specifically approved by our Chief Legal Officer.

Building Our Understanding

Here are some terms that we should understand:

- ▶ **Anything of Value** – Anything the recipient may value, which could include not only objects like watches, but also travel expenses, political or charitable donations, favors, such as an employment opportunity for a relative or a business opportunity
- ▶ **Facilitating Payments** – Informal payments, however small, that are made to government officials usually to speed up the process of some official action that they are charged with performing, such as issuing permits
- ▶ **Government Officials** – Any employees or officers of any level of government, whether international (such as the UN, World Bank or EU), national, state, provincial or local; or of any government-owned or government-run entities, such as a university or hospital. The term also includes employees or officials in political parties or candidates for political office.



Know the Code

Question: My team is doing business in a country new to us. An “agent” approaches us and offers to help us get through some legal processes that they claim usually require some kind of off-the-books payments to push through. The agent charges a modest fee for the service. Should we accept the offer?



WE AVOID INSIDER TRADING

We do not buy or sell publicly traded securities when we have inside information about that company. We also do not share inside information with others unless they have a right to access the information.

Why It Matters

To protect the integrity of the marketplace, everyone who buys or sells publicly traded securities must have access to the same relevant information. So, insider trading laws make it illegal for anyone who has certain privileged information to do any trading until the information becomes publicly available. These laws also discourage company insiders from using privileged information for personal gain at the expense of the company and ordinary investors.

Bringing It Home

We avoid insider trading by:

- ▶ **Protecting the confidentiality** of the nonpublic information that we have about Stewart and our business partners and not buying or selling any securities of those companies until the information has become publicly available
- ▶ **Avoiding discussions** about Stewart or our business partners that may reveal confidential information to others who have no right to the information and who could use it to buy or sell stocks, a practice that may be considered illegal “tipping”



Building Our Understanding

Here are some key terms:

Inside information – Information that is both nonpublic (confidential or privileged) and “material,” meaning it could influence a reasonable investor’s decision to buy or sell a company’s stock or other securities. Examples of material information include:

- ▶ Information regarding quarterly or annual earnings
- ▶ A change in the dividend or stock split
- ▶ A merger or acquisition
- ▶ Major new customers or products
- ▶ Reorganizations, litigation or security breaches
- ▶ Any other information a reasonable investor could consider important when making a trade

Publicly Traded Securities – Shares of a company or “stock” that is traded through a publicly available stock exchange, such as the New York Stock Exchange or Nasdaq



Know the Code

Question: I recently discovered that one of our business partners is about to merge with another company, but the information has not yet been released to the public. Even though it is confidential, could it still violate insider trading laws if I mentioned it in private to a family member, such as my spouse?



Resources

[Securities and Trading
Investment Policy](#)

WE WORK WITH BUSINESS PARTNERS WHO SHARE OUR VALUES

We work only with business partners who agree to follow our Supplier/Vendor Code of Conduct.

Why It Matters

Our suppliers, vendors and other business partners play a vital role in helping us to carry out our basic operations. If our business partners do not comply with the values of our Code, our business operations will not align with our values and our Code.

Bringing It Home

We ensure that our suppliers, vendors and other business partners share our values by:

- ▶ **Screening** them so we do not engage with partners who have a history of unethical or illegal conduct
- ▶ **Making** their agreement with our Supplier/Vendor Code of Conduct a condition for working with us
- ▶ **Ensuring** that our business partners both understand the Supplier/Vendor Code of Conduct and report any violations that they witness or suspect to a reporting resource



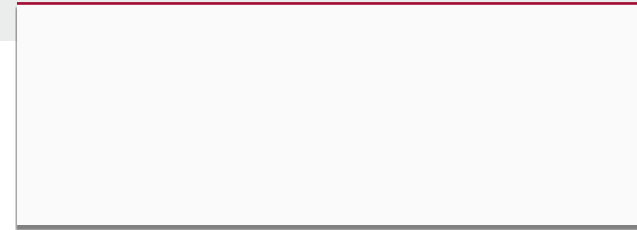
Resources

[Supplier/Vendor Code of Conduct](#)

WE SAFEGUARD OUR COMPANY

We protect the assets that sustain our business, which include:

- ▶ Financial assets
- ▶ Confidential information and intellectual property
- ▶ Personal data
- ▶ Our technologies
- ▶ Our reputation



WE SAFEGUARD OUR FINANCIAL ASSETS

We take fraud prevention and detection very seriously. Everyone at Stewart has a responsibility to follow laws governing settlement procedures and to report fraud and other insurance and financial crimes like money laundering. All employees, officers and directors should protect Stewart's assets and ensure their efficient use. Theft, carelessness and waste of time have a direct impact on Stewart's profitability. All Stewart assets should be used for legitimate business purposes.

Why It Matters

Safeguarding our financial assets minimizes the risk of fraud and theft, which helps us to maintain overall financial health for our operations and protect the clients we serve. We are also obligated to adhere to laws and regulations to avoid penalties and legal actions. Finally, financial stability is essential for upholding our reputation and maintaining the trust of our customers, business partners and investors.



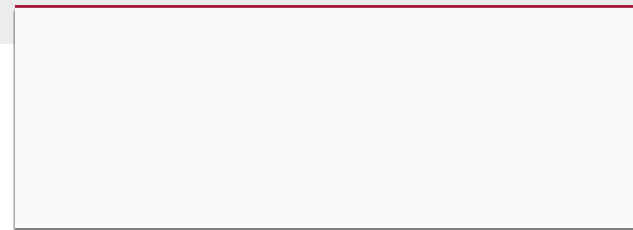
Bringing It Home

We prevent fraud, money laundering and other financial crimes by:

- ▶ **Educating** the appropriate employees on fraud detection
- ▶ **Hiring** or contracting with fraud investigators
- ▶ **Reporting** actual or suspected instances of fraud to internal [reporting resources](#)
- ▶ **Pursuing** restitution, where appropriate, for financial loss caused by insurance fraud
- ▶ **Following** processes to comply with applicable law
- ▶ **Keeping** accurate records, retaining them for sufficient periods and destroying them according to applicable law unless an exception for a legal action applies

Know the Code

Question: A customer is trying to purchase real estate through procedures that appear unusually complex, involving offshore companies whose ownership is difficult to trace. This customer is also in a rush to get it all done without going through all our procedures. What should I do?



Building Our Understanding

We should be familiar with the following:

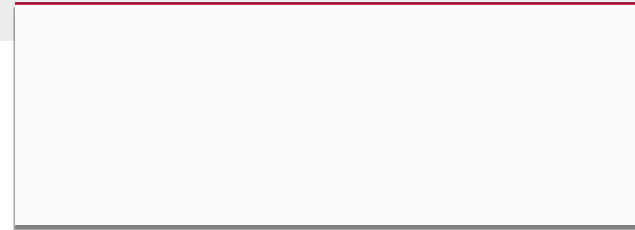
- ▶ **Stewart's Anti-Fraud Plan** – This plan functions with existing internal procedures to prevent, detect and investigate all types of fraud, including claims fraud, agent fraud, internal fraud, wire fraud and other types of fraud targeting Stewart and our industry.
- ▶ **Money Laundering** – The process of concealing the illegal origins of money by passing it through a sequence of banking transfers or commercial transactions that can include escrow or real estate transactions. The process attempts to "clean" the money to the launderer in an indirect way.
- ▶ **Record Retention Requirements** – The length of time we must retain our records, which include original or copies of hard-copy or electronic documents, emails and the like. The exact duration varies by type, applicable laws and Stewart policy. Consult with a Compliance Officer (ethics@stewart.com) for the specific requirements provided by our Legal Department.

Important: *Regardless of any destruction schedule, never destroy or relocate any record that may be applicable or relevant to any pending, threatened or likely claim, investigation or legal action of any kind. Doing so could lead to charges of fraud or attempts to cover up fraud, which would be very serious for both Stewart and the individuals involved.*



Resources

[Anti-Money Laundering Policy](#)

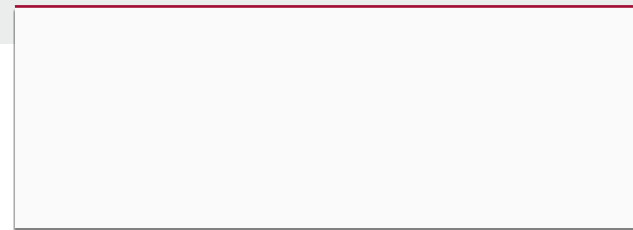


WE PROTECT CONFIDENTIAL AND PROPRIETARY INFORMATION

We all have a responsibility to protect the company's confidential and proprietary information, especially our trade secrets.

Why It Matters

We maintain a competitive advantage by protecting our intellectual property and keeping our proprietary information confidential. The trust of our customers and business partners also rests upon our ability to safeguard their confidential information.



Bringing It Home

We safeguard our confidential and proprietary information and that of our customers and business partners by:

- ▶ **Sharing** the information only when the recipient has:
 - A legitimate need to know such information according to their job duties
 - No responsibilities or duties that could lead to a conflict of interest (actual or apparent) or to a misuse of such information
 - Been informed that the information is confidential and has been given instructions about the limitations on sharing it
 - As appropriate, signed a non-disclosure agreement
- ▶ **Not using** cameras, cell phones, webcams or other image or sound recording devices to capture confidential, proprietary or trade secret information or material
- ▶ **Assuming** that information is confidential if there is any doubt, and protecting it accordingly
- ▶ **Never using** confidential or proprietary information for any personal purpose, including to further a private interest, make a personal profit or permit any others to do so
- ▶ **Respecting copyrights** and following the law by never reproducing copyrighted content in any way without the owner's permission unless a fair use exception applies. Graphics, written material, and video or audio recordings found on the Internet, in publications or unpublished material are often copyrighted. This is true even if there is no © symbol notice.

Building Our Understanding

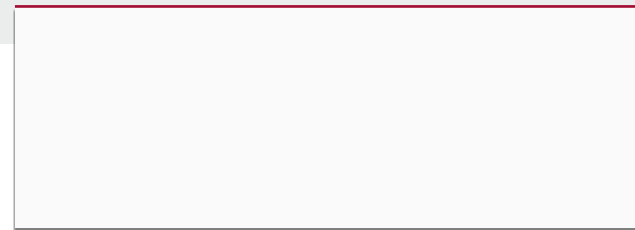
Some key things to know about protecting confidential or proprietary information:

Confidential or Proprietary Information includes intellectual property, such as trade secrets, a term that refers to any kind of business information that would give our competitors a strategic advantage if known. These are just a few examples:

- ▶ Sales or promotional plans
- ▶ Information about business development, operations, products or services
- ▶ Financial forecasts, methods or pricing strategies
- ▶ Customer or referral sources
- ▶ System designs
- ▶ Customer lists
- ▶ Customer account and transaction information

Customer Correspondence and Identity – Never discuss transactions, conversations or negotiations involving customers or our business partners with anyone who does not have a legitimate need to know such information. Even the fact that a person or entity is one of our customers should be treated as confidential information.

Confidential and Proprietary Information of Former Employers – Just as we must keep Stewart's confidential and proprietary information confidential even after leaving the company, we also must not use any confidential information belonging to other organizations or persons, including any former employers, in our work for Stewart.



Know the Code

Question: I would like to take a portion of an internal business presentation I created for Stewart and make it available to the public. However, I'm not sure who is considered the copyright holder or whether the presentation contains trade secrets or other confidential information. Since I created the work, can I decide where and when to present it?



Resources

Stewart Employee Policies

WE SECURE PERSONAL INFORMATION

Keeping customer information secure and using it appropriately is a top priority. We are all responsible for safeguarding the confidential information of our customers, business partners and colleagues, especially their personal information.

Why It Matters

The company, our customers and other individuals can suffer significant consequences, such as identity theft, reputational harm and regulatory fines, due to the mishandling of personal information. Data protection laws require that we collect the minimum necessary personal information and handle personal information in a manner that is fair, transparent, accountable and secure. We have an obligation to comply with all such laws that apply to our operations.





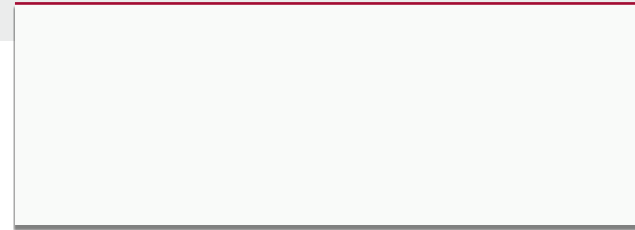
Bringing It Home

We help safeguard the personal information we handle when we:

- ▶ **Use** customer information only for the reasons for which the information was gathered
- ▶ **Follow** our policies that detail our specific commitments to our customers and to the processes that define, document, monitor and manage the security of information
- ▶ **Understand** that data protection laws regarding the collection, use, disclosure and transfer of personal information may apply to our operations
- ▶ **Consult** with management, Security or a [Compliance Officer](#) when we have questions about handling personal information
- ▶ **Ensure** that we and our business partners restrict access to and the dissemination of certain kinds of personal information, including employee medical and personnel records
- ▶ **Engage** in security and privacy training to help identify and protect personal information from unauthorized disclosure or access, including phishing awareness training and security training

We must not share personal information inside or outside of Stewart unless one of the following applies:

- ▶ The recipient has a legitimate business need or use for the information, such as to:
 - Provide services to the business pursuant to a written agreement
 - Comply with a law, rule, regulation, subpoena or order
- ▶ The individual has authorized its disclosure
- ▶ Our Legal Department has approved its disclosure.



Building Our Understanding

Here are some key terms that we should know:

- ▶ **Personal Information** – Any information that, alone or in combination with other information, can identify an individual. It includes names, postal addresses, phone numbers, email addresses, account or government-issued numbers, internet protocol addresses, photographs, health information, creditworthiness and any other personal information about our customers, business partners and colleagues.
- ▶ **Data Protection Laws** – Laws, regulations and rules that govern how we may collect, store, use and disclose the personal information of our customers, business partners and colleagues. They typically require that we notify the individuals regarding the information we intend to collect, limit the personal information we collect to the minimum necessary to achieve the purposes for which we collected the information, maintain appropriate security controls, report security breaches and control the transmission of data internationally.



Know the Code

Question: A vendor has requested a spreadsheet that contains personal information about a large segment of our customer base. They have worked with us in the past and said this is routine. The spreadsheet contains more information than is needed. Should I send it to the vendor?



Resources

Stewart Employee Policies

[Privacy Policy](#)

[Stewart Notice of Privacy Practices](#)

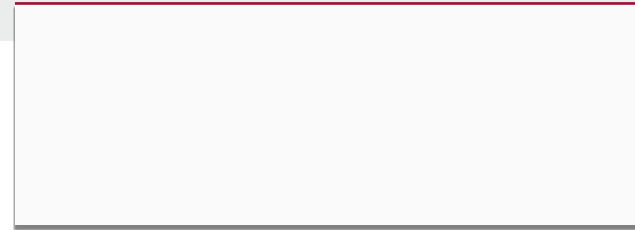
WE USE TECHNOLOGY WISELY

We embrace technology to enhance productivity, improve the quality of our work and drive innovation. At the same time, we understand that new technologies—especially those like generative artificial intelligence (AI)—come with limitations, risk and ethical considerations. Using technology wisely means balancing opportunity with responsibility.

Why It Matters

Keeping pace with technology is critical to remaining competitive and delivering exceptional service. When used appropriately, tools like AI can streamline work and unlock new capabilities. However, misuse—intentional or not—can lead to data breaches, biased outcomes, reputational harm or regulatory violations. It is our responsibility to stay informed, follow company guidelines and use these tools in a way that aligns with our values and legal obligations.





Bringing It Home

We use technology responsibly when we:

- ▶ **Understand** both the benefits and limitations of the tools we use
- ▶ **Receive** proper training before adopting new technologies
- ▶ **Apply** human judgment and oversight in all technology-assisted decisions
- ▶ **Comply** with company policies, industry regulations and legal standards
- ▶ Promptly **report** concerns, misuse or unexpected outcomes to our manager or EthicsPoint at www.ethicspoint.com

We use AI responsibly when we:

- ▶ Confirm that AI-generated content is accurate, appropriate and free from outdated or biased information
- ▶ Never input confidential, proprietary or customer-specific data into public or unapproved AI tools
- ▶ Never allow AI tools or bots to record a conversation or attend a meeting without our knowledge and consent
- ▶ Clearly disclose when content is created or significantly assisted by AI, especially in customer-facing or regulatory contexts

- ▶ Use only tools that have been reviewed and approved by the AI Council or IT
- ▶ Inform managers and share lessons learned with the AI Council when experimenting with new tools
- ▶ Consult the AI Council before starting any new AI-based initiative by emailing AICouncil@stewart.com

Building Our Understanding

Some key terms that we should be aware of:

- ▶ **Generative AI** – Technology that creates new content (text, images, video, etc.) by learning patterns in existing data. Examples include CoPilot, Claude, Grok, ChatGPT, DALL·E and other tools that respond to user prompts.
- ▶ **AI Tools** – Any applications that use artificial intelligence and have been reviewed and approved for internal use by the AI Council or IT.



Resources

Stewart Social Media and Media Policy
Information Technology Security and Usage Policy and
Application Security Policy
Stewart AI

WE SAFEGUARD OUR REPUTATION

We are careful to protect Stewart's reputation in media relations and on social media. No one may speak on behalf of Stewart without the explicit written permission of our Communications Manager or Chief Legal Officer.

Why It Matters

Stewart's success depends in part on the image we project to the public. Only authorized persons may speak on behalf of Stewart to ensure consistent and accurate messages are delivered using proper disclosure practices.

Know the Code

Question: A post on my colleague's social media account contains some material that is likely copyrighted by Stewart. What should I do?



Resources

Social Media, Media and Website Creation/Access Policy
Stewart Employee Policies

Bringing It Home

We protect Stewart's reputation on social media by:

- ▶ **Realizing** that our postings about Stewart, even if they are about us as individuals, affect the company's business, brand and reputation
- ▶ **Appreciating** that social media postings are a public disclosure and taking care not to post anything that could be confidential or infringe on intellectual property, such as copyrights
- ▶ **Respecting** others when communicating online, being careful not to bully or harass, use obscenities or make discriminatory comments
- ▶ **Clarifying**, if there is any confusion, that we are speaking on our own behalf rather than Stewart's when communicating online
- ▶ **Reaching** out to our manager, a [Compliance Officer](#) or the [Legal Department](#) instead of commenting on or attempting to correct a company-related social media posting, if we are unsure it is appropriate or if we see inaccurate information about Stewart

When responding to media inquiries, we must make it clear that we cannot speak on behalf of Stewart unless we have been specifically authorized to do so. We refer media representatives to the [Communications Manager](#) immediately.

WE CARE FOR OUR WORLD

We support a Culture of Caring by:

- ▶ Contributing to our communities and encouraging involvement through volunteerism
- ▶ Reducing our carbon footprint
- ▶ Performing due diligence to choose business partners that respect human rights

WE ENGAGE WITH OUR COMMUNITIES

The communities where we work and live are very important to us. Stewart wants to encourage employees to get involved with the local organizations and causes they are most passionate about. So, we empower employees with generous support for those organizations and causes through The Stewart Title Foundation, Inc.

Why It Matters

Our business depends on thriving communities. Taking actions like volunteering and making contributions both provides us an opportunity to do something good and helps us to better understand and support the communities that we serve.

Bringing It Home

Here are some of the ways that Stewart has been contributing to our communities:

- ▶ **Increased** our charitable donations substantially through our Community Service Awards Program. This initiative supports employee-designated charities, foundations and other nonprofit organizations in all 50 states and the District of Columbia.
- ▶ **Strengthened** ties to communities across the U.S. by funding home repairs through our charitable partners, Rebuilding Together® and Feeding America®. In this way, we provide opportunities for employees to give back.
- ▶ **Expanded** the Stewart Scholarship class

Building Our Understanding

Here are some things you should know about our contributions to our communities:

- ▶ **The Stewart Title Foundation, Inc.** actively manages our giving and volunteer activities on an enterprise level, empowering our employees to drive change together. We have expanded our enterprise partnerships and grown our community programs.
- ▶ **Paid time off for volunteering** is now offered to every eligible employee globally, providing two days of paid time off annually to volunteer in our communities, either individually or as a team. Stewart is proud to be able to offer employees an opportunity to work with charities of their choice and give back to causes that are important to them.



Resources

[Sustainability](#)

WE WORK TOWARD A SUSTAINABLE FUTURE

We strive to be a part of the solution in maintaining a healthy environment and reducing our carbon footprint.

Why It Matters

Everyone's health and well-being depend on a sustainable and thriving biosphere on the only planet we call home. Humanity cannot thrive without a clean and livable environment.

Bringing It Home

Here are some ways that Stewart contributes to environmental sustainability:

- ▶ **Powering** our home office with renewable energy
- ▶ **Saving** trees from being harvested
- ▶ **Reducing** paper consumption through electronic signing of documents (our NotaryCam® subsidiary performs signings remotely, eliminating the associated carbon emissions of vehicles traveling for those signings.)



Resources

[Sustainability](#)

[Environmental/Climate Policy](#)

WE RESPECT HUMAN RIGHTS

At Stewart, respecting human rights is a responsibility we take seriously, but we don't stop there. We are also committed to positively impacting human rights issues worldwide.

Why It Matters

Human rights are fundamental to human well-being and growth. It is also an area of growing importance to our employees, partners, shareholders, customers and communities.

Bringing It Home

In our dedication to creating operating environments where human rights are protected and respected, we:

- ▶ **Source** responsibly and never tolerate human trafficking, modern slavery, child labor or forced labor of any kind in our supply chain
- ▶ **Practice** due diligence to screen our business partners at home and abroad
- ▶ **Identify** and address actual and possible adverse human rights impacts we may be directly or indirectly involved with through our activities or business relationships
- ▶ **Pay particular attention** to individuals or groups that may be at greater risk of negative human rights impacts due to their vulnerability or marginalization, and recognize the unique risks women and minority groups may face
- ▶ **Hold** each other accountable to our Human Rights Policy, provide training on important matters affecting human rights and require employees to regularly review the policy



Resources

[Sustainability](#)

[Human Rights Policy](#)

WE SUPPORT PARTICIPATION IN THE POLITICAL PROCESS

Stewart respects the rights of everyone at the company to participate in the political process as individuals.

Why It Matters

While the company supports everyone's right to participate in political processes, we all must also draw a clear line between Stewart's views as a company and our own views as individuals. Keeping them separate respects the rights of everyone at Stewart.



Bringing It Home

When engaging politically, we:

- ▶ **Participate** in any lawful political activities of our choice on an individual basis, with our own money, resources and time
- ▶ Unless approved in advance by our Chief Compliance Officer, **never**:
 - **Use** our work time for any political campaign
 - **Offer** the use of Stewart’s facilities, equipment or personnel in any political campaign
 - **Contribute** on behalf of Stewart in any political campaign
 - **Direct** any Stewart funds to any political campaign contributions or purposes or in connection with any general or primary election, regardless of whether the election is taking place within the United States or elsewhere

In addition:

- ▶ **Running** for a public office requires prior written approval from our Chief Legal Officer.
- ▶ **Lobbying** on behalf of Stewart requires express written authorization from our [Chief Legal Officer](#).



Resources

[Sustainability](#)



Know the Code

Question: During a recent client meeting, a political topic came up, and I shared some of my personal views. Is that OK?



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