

Standards of Conduct



Standards of Conduct

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Policy

The *Standards of Conduct*, the *Stewart Code of Business Conduct and Ethics* and the *Human Rights Policy* are designed to prevent and detect violations of laws, regulations and ethical conduct applicable to Stewart’s business operations. Refer to *Stewart Business Code of Conduct and Ethics* and *Human Rights Policy* for related information.

An employee who has been found by the Company to have violated or engaged in conduct inconsistent with any policy enumerated in the Standards of Conduct policy is subject to disciplinary action, up to and including termination of employment.

Attendance & Tardiness

Each employee is required to be present and ready to work on time from the start to the end of each working day, according to his/her work schedule assigned by management. If unable to report to work for any reason, an employee is to inform the manager or designee no later than 30 minutes from the commencement of the scheduled start time, unless otherwise directed by management.

Any employee in violation of the Attendance & Tardiness policy may be subject to disciplinary action, up to and including termination. Refer to *Disciplinary Action (under Employment)*, *Hours of Work*, and *Time Off* policies for related information, unless such absences are otherwise protected by applicable law.

If an employee fails to report to work without proper notice for three (3) consecutive scheduled workdays, the Company will presume the employee has voluntarily resigned and the employee will be terminated from employment, unless applicable law defines a longer period prior to termination and/or unless such absences are otherwise protected by applicable law.

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Attire and Personal Representation (Dress for Your Day)

Employees may use discretion to select appropriate dress attire for each working day and when representing the Company. The dress and appearance of all employees should be professional and appropriate for the work environment. Employees should consider the day's activities and, if meeting with customers, vendors or other non-Company personnel, employees should wear attire appropriate for the situation. Employees are expected to use good judgement in their appearance and grooming, maintain proper hygiene, and should be dressed appropriately for their day. If an employee's personal representation poses an issue, management or Stewart Human Resources may address the concern(s) with the employee. If an employee is asked to leave work to address a personal representation issue, time lost is not considered work time.

Stewart will reasonably accommodate exceptions to this policy if required due to an employee's bona fide religious beliefs, medical condition, or disability. Employees who need such an accommodation should contact their manager or Stewart Human Resources.

Refer to *Employment* policy for related information.

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Confidentiality

Each employee is responsible for using his/her best judgment to safeguard and manage confidential information at all times.

This policy is intended to alert employees to the need for discretion at all times and is not intended to inhibit normal business communications, nor is it intended to prevent employees from discussing the terms and conditions of their own employment.

Refer to *Employment*, *Stewart Code of Business Conduct and Ethics*, and *Information Technology Security and Computer Usage* policies for related information.

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Anti-Harassment/Anti-Discrimination/Anti-Retaliation

Stewart is committed to providing a professional work environment that is free of unlawful harassment and discrimination. Company policy prohibits sexual harassment (by members of the same sex and opposite sex), and harassment or discrimination based on race, color, religion, creed, gender, pregnancy or related medical conditions, age (40 and over), national origin or ancestry, physical or mental disability, genetic information or any other consideration protected by applicable law. The Company's policy applies to all persons involved in the operation of the Company and prohibits harassment by any employee of the Company, including managers and co-workers, as well as by any person doing business with or for the Company. Conduct of Company employees while performing their duties outside the workplace shall also be governed by this policy.

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Reporting Incidents and Potential Violations

Employees who believe that they have been harassed or discriminated against by a co-worker, manager, agent, client, vendor or customer of the Company, or who are aware of misconduct, harassment of and/or discrimination against others, must report their concern to management, Stewart Human Resources or EthicsPoint at (866) 384-4277 or www.ethicspoint.com as soon as possible after the incident. Reports may be anonymous, if preferred. If the reporting person is not identified, the Company might not be able to respond appropriately to the reported concern. The Company will immediately undertake an investigation of the harassment or discrimination allegations and will endeavor to protect the privacy and confidentiality of all parties involved to the extent possible, consistent with a thorough investigation.

If the Company determines that prohibited harassment or discrimination has occurred in violation of this policy, effective appropriate action will be taken in accordance with the circumstances involved. Any employee determined by the Company to have violated this policy will be subject to appropriate disciplinary action, up to and including termination. All employees must immediately report any incidents of harassment or discrimination in violation of by this policy so that such concerns can be quickly and fairly resolved. Any report of harassment or discrimination must be made in good faith.

Protection Against Retaliation

The Company will not retaliate against employees for filing a complaint and will not tolerate retaliation by management, employees or co-workers. Retaliation is prohibited against any person, by another employee or by the Company, for using this complaint procedure, reporting harassment, or for filing, testifying, assisting, or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation could include, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions, or otherwise denying any employment benefit because of an employee's protected activity.

Any report of retaliatory conduct will be investigated thoroughly and objectively. If the Company determines a violation of this policy has occurred, appropriate disciplinary action, up to and including termination, will be taken.

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Misconduct

Violation of any Company policy (whether stated herein or provided elsewhere by the Company) is considered misconduct. Although it is impossible to identify every possible instance of misconduct, the following is a non-exhaustive list of infractions that the Company also considers misconduct:

- Unethical, dishonesty, insubordination, unprofessional or otherwise inappropriate behavior
- Attempt or actual theft or complicity in theft and/or fraud
- Negligence, carelessness or recklessness resulting in a financial loss to the Company including contributing to the injury of any person or damage to Company property. Includes employee theft, fraud or other loss and not reporting it to management or complying with the Stewart Code of Business Conduct and Ethics
- Attempt or actual vandalism, or unauthorized removal or destruction of Company property or the property of others from Company premises
- Falsification of any Company related documentation including, whether paper or electronic. These

documents include but not limited to, employment applications, time reporting records (one's own or another's), check requests, expense reports, customer files or related paperwork, contracts as well as other legal and business documents

- Unauthorized copying or accessing a customer's sensitive and proprietary information
- Release of confidential information, Company finances, customer, applicant or employee personal information, customer credit card or banking information and providing any Company information to outside parties. This includes unauthorized dissemination, distribution or use of another employees system passwords, unique codes, access badges or keys
- Unauthorized copying or distribution of software, DVRs, DVDs, or other electronic devices to play copied software or assisting others to do so. Includes possession of unauthorized software copies and tampering with the Company's computer system/network/hardware
- Making unauthorized purchases or financial commitments on behalf of the Company
- Violation of the Company's equal employment opportunity or harassment policies
- Physical violence, fighting, or verbal or physical intimidation or harassment of fellow employees or customers; carrying prohibited weapons or explosives as defined in the *Weapons* policy, or violation of criminal laws on company premises
- Extreme rudeness to another employee, supervisor, manager or customer; interfering with the performance of fellow employees
- Violation of the Company's confidentiality or solicitation policy
- Illegal activities while at work, irrespective of work location, on Company premises, or while conducting Company business, including gambling
- Conviction of any felony or crime or any other conduct or behavior which can be reasonably construed to indicate that continued employment would constitute a threat or hazard to fellow employees, customer, the Company, its property or its reputation
- Use of Company computer systems or other electronic communication in violation of the Company's harassment policy and/or any other Company policies
- Falsification of any claims of inappropriate conduct
- Insubordination or refusal to comply with lawful instructions or failure to perform reasonable duties as assigned
- Inappropriate interaction with a customer or client, which may negatively impact the Company's reputation
- Unauthorized or improper use of business expenses (e.g., reimbursement or Company-issued Stewart One Card or other corporate credit card)
- Performing work of a personal nature during working time
- Willful or careless destruction or damage to Company assets or to the equipment or property of another employee
- Failure to adhere to any rules designated by management regarding pets (other than service animals), dependents or other visitors in the workplace
- Impersonation of any person or entity including, but not limited to, a Stewart employee or Officer, or false statement or misrepresentation of an affiliation with a person or entity
- Representation of personal opinions as those of the Company or purporting to represent the Company without explicit authorization
- Failure to comply with Company procedures or standards

This list is not all-inclusive. There are additional types of conduct serious enough to warrant immediate corrective discipline up to and including termination of employment.

Management, in its sole discretion, reserves the right to determine when an employee's behavior is unacceptable and when and what type of disciplinary action is necessary under a given circumstance. Similarly, employees may be

subject to discipline for poor performance and violation of other policies and procedures. The type of disciplinary action that may be imposed may vary depending on the facts and circumstances surrounding each case. The Company may skip or repeat certain disciplinary steps depending on the circumstances of each situation. Violations of any of the Stewart Employee Policies, any Company and/or department specific policy or procedures may lead to disciplinary action, up to and including termination of employment. This policy in no way creates a contract of employment, alters the at-will relationship, or otherwise obligates the Company to follow any particular disciplinary procedure.

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Outside Employment

The Company respects each employee's right to engage in activities outside of employment such as those that are of a personal or private nature, to the extent that such activities do not interfere with job performance or efficiency, involve the use of Company resources or time, pose a conflict of interest, or in any way harm the business or reputation of the Company. For the purposes of this policy, self-employment is considered outside employment.

Engaging in outside employment prohibited by this policy may lead to disciplinary action, up to and including termination.

The Company will not assume any responsibility for employees' outside employment. Specifically, Stewart will not provide workers' compensation coverage or any other benefit for injuries occurring from, or arising out of, such outside employment.

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Safety and Emergency

Stewart makes every effort to provide safe working conditions for our employees. Safety is the responsibility of every employee. Employees are required to abide by all Company safety rules, policies and procedures, including, but not limited to, those set forth in this policy. If unsafe work practices are reported, employees may be subject to appropriate disciplinary action, up to and including termination. Furthermore, refusal to comply with this policy or to put one's self or any other person in imminent danger by unwillingness or neglect may result in immediate termination of employment.

Reporting Accidents or Injuries

Employees are required to report any and all on-the-job accident or injury that results in bodily harm and/or property damage to any manager immediately or as soon as reasonably possible. This applies not just to employees who are directly involved in an on-the-job accident or injury, but also to any employee who has knowledge of an on-the-job accident or injury. Any employee who does not report within 24 hours a known on-the-job accident or injury resulting in bodily harm and/or property damage may be disciplined, up to and including termination. The purpose of this policy is to help maintain a safe work environment. Stewart will not tolerate retaliation against any employee who reports an on-the-job accident or injury to management.

Refer to *Worker's Compensation Insurance and Disability Accommodations (under Employment)* policy for related information.

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Security, Access and Identification

Access needs for each employee are determined by management. If provided, employees may be required to wear security badges while on work premises for identification and/or access purposes. Where it is required to wear security badges while on work premises for identification and/or access purposes, employees will be subject to disciplinary action, up to and including termination, if he/she does not comply with the requirements. Employees must follow any precautions provided to ensure security badges and Company keys are protected and secure at all times. Where available, access may be monitored by card readers, video cameras or other monitoring devices.

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Smoking

The use of all tobacco products, electronic cigarettes and other vapor emitting devices are not allowed in any Stewart building. Employees may only use these products in designated areas and must adhere to applicable law regarding smoking.

Refer to *Hours of Work* policy for related information on smoking breaks.

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Solicitation

The Company has established rules applicable to all employees and non-employees that govern solicitation, distribution of written material, and access to Company property. Compliance with these rules is required.

- No employee may engage in solicitation during his/her working time or during the working time of the employee or the employees at whom such activity is directed
- No employee may distribute or circulate any written or printed material in work areas at any time, or during his/her working time or during the working time of the employee or employees at whom such activity is directed
- Non-employees are not permitted to solicit or to distribute written material for any purpose on Company property
- Off-duty employees are not permitted in work areas

As used in this policy, "working time" includes all time for which an employee is paid and/or is scheduled to be performing services for the Company; it does not include break periods, meal periods, or periods in which an employee is not performing and is not scheduled to be performing services or work for the Company.

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Violence in the Workplace Prevention

It is Stewart's goal to have a workplace free from acts or threats of violence and to effectively respond in the event that such acts or threats of violence do occur. Workplace violence is any intentional conduct that is sufficiently severe, offensive or intimidating to cause an individual to reasonably fear for his/her personal safety or the safety of his/her family, friends and/or property such that employment conditions are altered, or a hostile, abusive or intimidating work environment is created for one or several employees.

Workplace violence does not refer to occasional comments of a socially acceptable nature. Such comments may include references to legitimate sporting activities, popular entertainment or current events. Rather, it refers to

behavior that is personally offensive, threatening or intimidating. The prohibition against threats and acts as described above applies to all persons involved in the operation of the Company, including, but not limited to, Stewart contract and temporary employees and non-employees on Stewart property.

No provision of this policy statement or any other provision in this policy shall alter the at-will nature of employment with the Company. Stewart will make the sole determination of whether and to what extent, threats or acts of violence will be acted upon by the Company. In making this determination we may undertake a case-by-case analysis in order to determine whether there is a reasonable basis to believe that workplace violence has occurred.

Any employee or other individual, who is aware of any potentially dangerous situation, whether he/she has been subjected to, witnessed or made aware of, should immediately report the incident to management, Stewart Human Resources or EthicsPoint at (866) 384-4277 or www.ethicspoint.com.

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Weapons

In the interest of maintaining a workplace that is safe and free of violence, Stewart prohibits the presence or use of handguns, firearms and other dangerous weapons on Company property, regardless of whether or not the person is licensed to carry the weapon. For purposes of this policy, "Company property" is defined as all Company-owned or leased buildings and surrounding areas such as sidewalks, walkways and driveways under the Company's ownership or control, except as noted below. In addition, this policy applies to all Company-owned or leased vehicles. "Dangerous weapons" include, but are not limited to, firearms, knives, explosives, and other similar weapons.

Any employee who violates this policy is subject to disciplinary action, up to and including termination. A visitor who violates this policy may be removed from the property and reported to authorities. This policy does not apply to law enforcement personnel or security personnel who are engaging in official duties.

The Company reserves the right at any time and at its discretion to search all Company-owned or leased vehicles and all vehicles, packages, containers, briefcases, purses, lockers, desks, enclosures, and persons entering its property for the purpose of determining whether any weapon has been brought onto its property or premises in violation of this policy. Employees who fail or refuse to promptly permit a search under this policy will be subject to disciplinary action, up to and including termination.

Notwithstanding any of the foregoing restrictions, the Company does not prohibit employees who lawfully possess firearms or ammunition from storing their firearms or ammunition inside their locked, privately owned vehicles in parking lots or other parking areas provided by the Company. Such lawfully possessed firearms and ammunition may not be removed from the employee's personal vehicle or displayed to others. To the extent that parking lots or other parking areas utilized by employees are not owned by the Company, the owners of such parking lots may have additional rules that impact the storage of firearms and ammunition. In such situations, employees must comply with the rules of both the Company and the property owner, in keeping with applicable law.

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Related Materials

[Stewart Code of Business Conduct and Ethics](#)

[Supplier/Vendor Code of Conduct](#)

[Human Rights Policy](#)