

1.

Board governance of climate risks (and all ESG activities) is overseen at the ultimate holding company level. More specifically, the Nominating and Corporate Governance Committee (NCG) of the board is charged with overseeing the ESG activities of the parent. The entity is included in climate related activities of the ultimate holding company and these activities.

The chair of NCG, along with three other board members of the ultimate holding company, have attained skills and qualifications in ESG, sustainability and corporate responsibility.

The ultimate holding company has not yet established specific climate commitments but has detailed its ESG efforts in annual ESG reports that have been published in each of the past three years. In addition, environmental metrics have been reported (e.g. recycling efforts, electronic signings impacting paper usage and Scope 1 usage at its home office) in the annual ESG report. Three members of senior management of the ultimate holding company comprise the ESG Leadership Council and have been designated with responsibility for each of the pillars relating to environmental, social and governance. These members of management direct the efforts of the ESG Committee which leads each of the pillars. Quarterly the ESG committee (a broader group of management) meets to discuss the activities of each group. The ESG Leadership Council reports to the NCG each quarter.

2.

The company has identified ESG as a key risk in the ultimate holding company's key risk register which is managed by the Enterprise Risk Management Committee. This designation as a key risk insures that this issue is monitored on a quarterly basis. Climate risks are managed by the Environmental Management Committee which includes representatives from procurement, property and lease management, finance and business unit leaders. The ultimate holding company continues to assess its climate strategies and refine as needed given the changing landscape.

The company has qualitatively considered climate risks in its ORSA reporting.

Internally, the ESG committee meets quarterly to review accomplishments, upcoming activities and plans for reporting and disclosure of ESG activities of the company. In addition, the Enterprise Risk Committee meets quarterly (and reports to the full board) to assess the current status of all

enterprise risks, including climate. As noted previously, senior management charged with overseeing ESG activities also reports quarterly to NCG. Development of knowledge and skills in managing climate risk has been attained through self-study of published materials, webinars and consultations with third parties with expertise in these areas.

3.

The company has identified ESG as a key risk in the ultimate holding company's key risk register which is managed by the Enterprise Risk Management Committee. This designation as a key risk insures that this issue is monitored on a quarterly basis. Climate risks are managed by teams from procurement, property and lease management, finance and business unit leaders. The ultimate holding company continues to assess its climate strategies and refine as needed given the changing landscape. The company has qualitatively considered climate risks in its ORSA reporting.

Internally, the ESG committee meets quarterly to review accomplishments, upcoming activities and plans for reporting and disclosure of ESG activities of the company. In addition, the Enterprise Risk Committee meets quarterly (and reports to the full board) to assess the current status of all enterprise risks, including climate. As noted previously, senior management charged with overseeing ESG activities also reports quarterly to NCG. Development of knowledge and skills in managing climate risk has been attained through self-study of published materials, webinars and consultations with third parties with expertise in these areas.

4.

Stewart has spent time analyzing the net carbon footprint savings from the increasing number of electronic transactions and other similar analysis. Generally, however, Stewart's efforts have been largely focused on becoming a better corporate citizen from a climate perspective as opposed to analyzing the impact of climate change on the business. Title insurance, historically, has not been negatively impacted as a result of climate change.