MULTI-YEAR ACCESSIBILITY PLAN (2026–2030)

1. PURPOSE AND APPLICATION

This Multi-Year Accessibility Plan (the "Plan") sets out Stewart Title Guaranty Company's ("Stewart Title" or the "Company") strategy to prevent, identify and remove barriers to accessibility and to meet its obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA") and its Integrated Accessibility Standards Regulation (Ontario Regulation 191/11) (the "IASR").

This Plan applies to all employees, contractors and operations of Stewart Title in Ontario and is intended to be read together with the Company's Accessibility Policy and related internal procedures.

2. STATEMENT OF COMMITMENT

Stewart Title is committed to treating all persons in a manner that respects dignity, independence, integration and equal opportunity.

The Company is committed to:

- Meeting the accessibility needs of persons with disabilities in a timely manner;
- Identifying, removing and preventing barriers to accessibility; and
- Ensuring compliance with the AODA and the Ontario Human Rights Code.

Accessibility is an integral part of Stewart Title's overall governance, risk management and operational practices.

3. GOVERNANCE AND ACCOUNTABILITY

3.1 Oversight

Responsibility for accessibility compliance is assigned as follows:

- Human Resources: Overall oversight, maintenance of the Policy and Plan, and accessibility compliance reporting.
- Human Resources: Employment accessibility, training administration, accommodation and return-to-work processes, and individualized workplace emergency response information.
- Marketing/Communications: Public website and digital-content accessibility, including applicable WCAG requirements.
- Office Services: Physical accessibility, accessible elements and temporary disruption procedures.
- Legal & Compliance: Accessibility in procurement and acquisition processes.

3.2 Monitoring and Reporting

The Company will:

- Maintain documentation evidencing compliance;
- Periodically review progress against the Plan and report material accessibility matters through appropriate internal governance channels.
- Update this Plan at least once every five (5) years;
- Post the current Plan on Stewart Title's public website and provide it in an accessible format or with communication supports upon request, in consultation with the requestor.

4. ACCESSIBILITY STANDARDS – ACTION PLAN (2026–2030)

4.1 CUSTOMER SERVICE

Objective: Ensure goods, services and facilities are accessible to persons with disabilities.

Actions:

- Maintain and update accessible customer service policies and procedures.
- Continue to provide training to all employees and relevant third parties on accessible customer service.
- Maintain accessible feedback mechanisms (e.g., phone, email, online forms).
- Maintain documented procedures for:
  - Service animals and support persons
  - Assistive devices
  - Temporary service disruptions

Timeline: Ongoing (2026–2030)
Responsible: Human Resources

4.2 INFORMATION AND COMMUNICATIONS

4.2.1 Accessible Formats and Communication Supports

Objective: Provide accessible information to customers, employees and stakeholders.

Actions:

- Maintain a documented process to provide or arrange for accessible formats and communication supports upon request, in a timely manner, at no greater than the regular cost charged to others, and in consultation with the requestor.
- Continue to consult with requestors to determine appropriate formats.
- Ensure feedback and communication processes remain accessible.

Timeline: Ongoing
Responsible: Human Resources

4.2.2 Digital Accessibility

Objective: Ensure digital content meets accessibility standards.

Actions:

- Assess public-facing websites and critical digital platforms for compliance with WCAG 2.0 Level AA (or successor standards).
- Develop and implement remediation plans for identified gaps.
- Implement an accessibility review for new or materially changed public-facing websites, web content and digital solutions before release, and retain evidence of testing or supplier confirmation.

Timeline:

- Current-state assessment and compliance evidence in 2026; prompt remediation of identified legal gaps according to documented target dates; pre-release review and periodic monitoring ongoing through 2030.

Responsible: Communications

4.2.3 Emergency Information

Objective: Ensure emergency information is accessible.

Actions:

- Provide publicly available emergency procedures, plans and public safety information in an accessible format or with communication supports, upon request and as soon as practicable.
- Maintain and test the process for individualized workplace emergency response information, including consent-based disclosure to a designated helper and the required review triggers.

Timeline: Ongoing
Responsible: Human Resources

4.3 EMPLOYMENT

Objective: Ensure accessible and inclusive employment practices.

Actions:
Recruitment and Hiring

- Notify job applicants of accommodation availability throughout recruitment.
- For selected applicants requesting accommodation, consult with the applicant and provide or arrange suitable accommodation for the assessment or selection process; notify successful applicants of employee accommodation policies when making offers.

Employee Support
- Inform employees of policies supporting employees with disabilities as soon as practicable after employment begins and whenever those policies change.

Accommodation
- Maintain formal individual accommodation plans.
- Provide accessible formats and communication supports for employees.

Workplace Emergency Response
- Maintain individualized workplace emergency response plans where required.

Return-to-Work
- Maintain a documented return-to-work processes for employees who have been absent due to disability.

Career Development and Performance Management
- Consider accessibility needs in:
  - Performance management
  - Career development and advancement
  - Redeployment processes

Timeline:
- Formalization and documentation: 2026–2027
- Ongoing implementation: 2026–2030

Responsible: Human Resources

4.4 DESIGN OF PUBLIC SPACES (BUILT ENVIRONMENT)

Objective: Ensure that public-facing spaces are accessible.

Actions:
- Ensure that any new or redeveloped public spaces comply with applicable accessibility standards.Maintain existing accessible features and prevent disruptions to accessibility.

Timeline: As applicable to project lifecycle
Responsible: Office Services

4.5 PROCUREMENT AND THIRD-PARTY MANAGEMENT

Objective: Integrate accessibility into procurement and vendor management processes.

Actions:
- Take accessibility criteria and features into consideration, where appropriate and practicable, when procuring or acquiring goods, services or facilities.

- Where appropriate, consider accessibility requirements in connection with vendors providing customer-facing or digital services.
- Explore opportunities to incorporate accessibility considerations into vendor risk management processes.

Timeline:
- Policy integration: 2026–2027
- Ongoing implementation: 2026–2030

Responsible: Legal & Compliance

4.6 TRAINING

Objective: Ensure that employees and other persons required under the IASR receive appropriate accessibility training

Actions:
- Provide training on:
  - AODA requirements
  - IASR standards
  - Ontario Human Rights Code (as it relates to disability)
- Ensure training is:
  - Appropriate to roles
  - During onboarding, periodically thereafter and when applicable accessibility policies change
- Maintain records of training completion.

Timeline: Ongoing
Responsible: Human Resources

5. DOCUMENTATION AND RECORDKEEPING

Stewart Title will maintain records sufficient to demonstrate compliance, including:

- Accessibility policies and updates
- Training records
- Accommodation plans and procedures
- Evidence of digital accessibility assessments and remediation
- Records supporting accessibility compliance reporting

6. ACCESSIBILITY COMPLIANCE REPORTING

Stewart Title will:

- Complete an internal compliance assessment, collect supporting evidence and file Stewart Title's accessibility compliance report by December 31, 2026, and thereafter as required under the AODA;

- Ensure that filings are supported by appropriate internal documentation; and
- Obtain appropriate senior officer certification prior to submission.

7. REVIEW AND UPDATE OF PLAN

This Plan will be:

- Reviewed and updated at least once every five (5) years;
- Posted on Stewart Title's public website and otherwise made publicly available; and
- Provided in an accessible format or with communication supports upon request, in consultation with the requestor.

8. FEEDBACK AND CONTACT INFORMATION

Stewart Title welcomes feedback regarding accessibility.

Requests for information in accessible formats, feedback, or questions regarding this Plan may be directed to:

Human Resources Department
Stewart Title Guaranty Company
Royal Bank Plaza, North Tower
200 Bay Street, Suite 2600
Toronto, ON M5J 2J2
By Phone: 416.307.3300 or 888.667.5151 toll-free
By Fax: 416.981.7214 or 888.292.1388 toll-free
By Email: IntlHR@stewart.com

Accessible formats of this document and communication supports are available upon request. Stewart Title will consult with the requestor regarding suitability.