Stewart Title Guaranty Company
Canadian Division

OSFI B-15 Climate Risk Management Report 2025

Cautionary Statements

Climate Metrics

The climate metrics, projections, forecasts, and other forward-looking statements referenced in this report should be interpreted with caution. These metrics are inherently more uncertain than historical financial information due to the evolving nature of climate science, data, and the broader uncertainty surrounding the future impacts of climate change.

Climate metrics referenced in this report include:

- Estimates of historical emissions
- Forward-looking climate metrics such as targets, projections, and forecasts

Our understanding of climate change impacts, data availability, methodologies, and measurement techniques continue to evolve. As a result, both historical and forward-looking climate metrics carry inherent uncertainty and may be less decision-useful than metrics derived from historical financial statements.

1. Variability in methodologies for estimating GHG emissions and other climate metrics

There is currently no universal standard for calculating greenhouse gas (GHG) emissions or related climate metrics. Frameworks and methodologies differ significantly, creating challenges for comparability and consistency.

For example:

- Some methodologies rely on company specific historical emissions data, while others estimate emissions using sectoral or geographic averages.
- Methodologies vary in their use of Scope 1, Scope 2, and Scope 3 emissions.
- Certain methodologies consider cumulative historical emissions, while others rely on point-in-time emissions intensity.

These variations create the risk of over or under-estimating emissions and related climate metrics.

2. Climate metrics require significant judgement and assumptions

Climate metrics depend on assumptions, technological developments, market conditions, and other uncertain factors. Any material change in these variables may render underlying assumptions, and therefore the resulting metrics incorrect.

For example:

- Some assumptions are used to compensate for data gaps, such as incomplete emissions histories or inconsistent company-specific targets. These assumptions may not accurately reflect actual conditions.

There is a risk that judgements, estimates, or assumptions used in these calculations may later prove inaccurate.

3. Limited availability of standardized, accurate, and comparable climate-related data

Climate-related risks, opportunities, and associated metrics depend on access to complete, accurate, verifiable, and comparable data. Across the insurance and other sectors, data availability and quality remain significant challenges.

For example:

- Climate-related data from counterparties or customers may be unavailable, incomplete, inconsistent, or unverifiable.
- Companies may rely on aggregated sector-level data from third parties, which may be prepared using differing methodologies or assumptions.
- There is no single data provider offering comprehensive, cross-sector climate data suitable for emissions analysis or physical and transition risk assessment.
- Regulatory requirements for climate-related disclosures are increasing, but gaps remain between the data needed and the data available.

As reporting standards, scientific understanding, and climate-related regulations evolve, the metrics and targets in this report may change. Future reports may not be directly comparable, and certain disclosures may be amended, updated, recalculated, or restated.

Other forward-looking statements

This report may contain, and Stewart may make forward-looking statements regarding future financial condition, performance, results, and objectives. These statements may include projections, estimates, plans, approaches, and targets.

Forward-looking statements often include terms such as believes, intends, expects, plans, will, seek, aims, may, could, outlook, objective, predict, likely, target, goal, guidance, trends, future, estimates, potential, and anticipates, or similar expressions.

All forward-looking statements involve inherent risk and uncertainty. Actual results may differ materially due to factors including, but not limited to:

- Regulatory measures addressing climate change and broader sustainability-related issues.
- The development of new standards, interpretations, and evolving sustainability reporting requirements
- The ability of Stewart, governments, and other stakeholders to measure, manage, and mitigate climate-related and broader sustainability-related impacts effectively.

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About This Report

This report has been prepared in accordance with OSFI's Guideline B15. Throughout the report, references to STC refer to Stewart Title Guaranty Company, which includes Stewart Title Guaranty Company – Canadian Division, and references to Stewart refer to activities and/or metrics related specifically to the Canadian business and its operations.

The content of this report is focused on the requirements of Stewart's stakeholders and relevant regulators. It focuses on concepts and key performance indicators (KPIs) that reflect Stewart's most material climate issues and was prepared in accordance with the OSFI's Guideline B15. Stewart continues to explore ways to improve our reported climate data for internal decision making and disclosing meaningful data for our external stakeholders.

Stewart also relies on this type of information from others to inform our investment and operational strategies and support our disclosures. As part of this commitment, the metrics and targets section of this report covers material frameworks and methodologies which we consider important in terms of communicating our approach to calculated emissions. Climate metrics include current estimates of emissions and forward-looking metrics such as targets, projections, and forecasts. See the Cautionary Statements section for the challenges and limitations related to measurement of emissions to determine the impact of climate change on Stewart.

About Stewart Title Guaranty Company

Stewart Title Guaranty Company is a leading provider of residential and commercial title insurance in Canada, trusted by lenders, legal professionals, and real estate professionals for nearly 30 years. We bring deep underwriting expertise, strong financial backing, and a proven commitment to improving the efficiency and security of real estate transactions across the country.

STC is a wholly owned subsidiary of Stewart Information Services Corporation, one of the largest and most financially stable title insurers globally.

Our Canadian Head Office is located at
200 Bay Street, Suite 2600, Royal Bank Plaza, North Tower | Toronto, Ontario M5J 2J2

Our Parent Company

Founded in 1893, Stewart (NYSE: STC) is a customer-focused, global title insurance and real estate services company. We offer products and services through our direct operations, our Stewart Trusted Provider® network of approved agencies and attorneys, and others within the Stewart family of companies.

Our customers include home buyers and sellers, residential and commercial real estate professionals, mortgage lenders and servicers, title agencies, real estate attorneys, investors, and home builders. Our dedication to these customers drives us every day to:

- Foster meaningful relationships through our innovation and efforts
- Provide the best experience for employees and customers
- Serve all our stakeholders in a sustainable way
- Create an inclusive workplace that fosters pride, passion, respect and belonging
- Lessen our impact on the environment
- Provide transparency around the way we do business

Our corporate offices are located at
1360 Post Oak Blvd. | Houston, Texas 77056

Global Footprint

- 7,800 employees worldwide
- 540 offices
- Operations in Canada, the United States, the United Kingdom, and Australia

Climate Strategy

Climate-Related Risks

We evaluate the full universe of transition, physical, and litigation risks before applying materiality thresholds. For Stewart, material climate-related impacts are defined as follows:

Transition risks refer to the business impacts associated with the shift to a low carbon economy. This transition may involve significant policy, legal, technological, and market changes aimed at mitigating climate change. Depending on the pace, direction, and scope of these developments, transition risks can create varying degrees of financial and reputational exposure for companies.

Physical risks relate to the business impacts arising from both acute and chronic climate events. Acute risks include sudden and disruptive events such as severe storms, extreme temperatures, floods, droughts, and wildfires. Chronic risks include gradual, long-term changes such as rising average temperatures, sea-level rise, and the spread of climate sensitive diseases. These risks may result in direct impacts, such as property damage, or indirect impacts, such as supply chain disruptions or resource scarcity.

Litigation risks refer to potential business impacts stemming from legal actions by parties seeking compensation for climate-related loss or damage. These claims may target entities perceived to have contributed to climate change or failed to adequately manage associated risks.

These climate-related risks to which Stewart may be exposed could emerge across different time horizons, and are expected to develop over the short, medium, and long term. Ensuring that we are positioned to respond effectively to these risks is essential to delivering long-term value.

Risk	Risk Type	Short/Medium Term	Medium/Long Term
Transition Risks	**Investments**	Potential reduction in returns from investments in carbon-intensive companies and industries that are not taking meaningful steps towards a low-carbon transition.	Potential reduction in returns from sovereign holdings where countries face significant transition challenges and lack the capacity to mitigate, adapt, or build resilience.
	Regulatory	Expansion of regulatory requirements will require expanded professional knowledge and skills, increasing costs to maintain compliance, and could lead to substantial fines.	Expansion of regulatory requirements will require expanded professional knowledge and skills, increasing costs to maintain compliance, and could lead to substantial fines.
	Reputational	Reputation and business results could suffer, based on society's views on climate change.	Reputation and business results could suffer, based on society's views on climate change.

Physical Risks	**Operations**	Disruption to business operations or supply chain caused by more frequent or severe extreme weather events affecting day-to-day activities.	

Climate-Related Opportunities

We also identify and assess material climate-related opportunities that may arise across different time horizons. Opportunities associated with the transition to a low carbon economy are expected to develop over the short, medium, and long term. Ensuring that we are positioned to respond effectively to these opportunities is essential to delivering long-term value.

Opportunity	Opportunity Type	Short/Medium Term	Medium/Long Term
Transition Risks	**Investments**	Enhanced returns from investments in companies or industries that are aligned with the transition to a low-carbon economy.	Enhanced returns from investments in companies developing technologies that support climate mitigation, adaptation, and resilience.

Climate-related risks and opportunities, and their potential impacts and associated metrics depend heavily on access to accurate, verifiable, consistent, and comparable climate-related data. Like many sectors, the insurance industry continues to face challenges related to data availability and quality.

Based on the assessment of these climate-related risks, Stewart has not identified any material financial or strategic impacts on its operations, and risks are managed through its Enterprise Risk Management Framework.

Time Horizons

The materiality and timing of climate-related risks and opportunities vary depending on the products, geographies, and investments under consideration. As a title insurance provider, Stewart evaluates risks within our underwriting processes using a long-term perspective.

Given the nature of title insurance, increased severity or frequency of weather-related events has limited potential to materially affect profitability. As a result, while these events are considered, the impacts are not explicitly incorporated into our Own Risk and Solvency Assessment (ORSA) modelling.

Stewart classifies climate-related risks and opportunities using the following time horizons, aligned with our strategy and business planning cycle:

- **Short term (0–3 years):** Risks and opportunities considered material within our three-year business and planning cycle.
- **Medium term (3–10 years):** Risks and opportunities expected to emerge or evolve over a mid-range planning horizon.
- **Long term (>10 years):** Risks and opportunities aligned with long-term strategic considerations and consistent with Science Based Targets initiative (SBTi) guidance for financial institutions.

Our Focus

Investments

As an investment owner, Stewart's has the potential to generate enhanced long-term returns by prioritizing investments that support decarbonization and climate adaption. Conversely, investments that are misaligned with the transition to a low-carbon economy or that fail to adapt to climate impacts may face devaluation, particularly over the medium to long term.

Operations

Stewart's Business Continuity Risk Management Framework takes an all-hazards approach to recovery and response strategies for operational disruptions that include physical workplaces, workforce, suppliers, and technology.

We remain attentive to our operational carbon footprint, particularly emissions associated with our office buildings, company vehicle fleet, and supply chain. We are assessing our operational emissions to determine how best to manage related risks and capture opportunities to improve energy efficiency and strengthen operational resilience.

Risk Management

The significance and timing of climate-related risk and opportunities vary depending on the geographic location and nature of the investments or business activities involved. While increased severity and frequency of weather-related events have the potential to affect profitability, our risk management framework is designed to ensure that Stewart remains resilient. This includes consideration of potential future management actions and the evolving landscape of climate-related risks and opportunities.

Strategic

Stewart monitors stakeholder expectations and the legal and regulatory environment for emerging changes that could significantly impact our operations and/or strategy.

Governance

Stewart is committed to maintaining a strong governance framework supported by effective and robust controls. Climate-related considerations and risks have been integrated into our risk appetite framework, including the articulation of our climate risk tolerance. Our governance approach is proportionate to the nature, scale, and complexity of our business, enabling management and its committees to incorporate climate-related risks and opportunities into planning, decision-making, and day-to-day business operations.

Throughout 2025, we continued to strengthen our climate risk capabilities and methodologies to better identify risks, opportunities, and enhance our risk management and risk appetite frameworks. The governance structure involved in climate oversight include:

- STC Board
- STC Enterprise Risk Management Committee
- STC Sustainability Committee
- Stewart Chief Agent & Branch Management
- Stewart Enterprise Risk Management Committee
- Stewart Climate Risk Committee

Management's Climate Roles and Responsibilities

Role	Responsibilities
Chief Agent	▶ Ensure compliance with legal, regulatory, corporate governance, social, ethical, and environmental principles. ▶ Oversee the integration of climate-related risks and opportunities into investment, operational and risk management processes through clearly defined roles and responsibilities. ▶ Identification and management of financial risks arising from climate change and oversees the development of Stewart's transition plan.
Chief Financial Officer (CFO)	▶ Advises the Chief Agent on exposure to financial risks from climate change, including impacts on strategy and the business model, and supports Stewart's Management in monitoring these risks. ▶ Supports the development and maintenance of appropriate disclosure and regulatory reporting practices related to climate-related financial risks. ▶ Produces and monitors key climate risk appetite measures on an annual basis and assesses performance against plans.
Chief Risk Officer (CRO)	▶ Conducts the annual review and approval of the climate risk appetite alongside other financial and non-financial risk appetites. ▶ Reviews and challenges managements risk monitoring processes to ensure they provide sufficient insight for effective risk management. ▶ Ensures climate-related risks and opportunities are identified, measured, monitored, and managed through the risk management framework and in alignment with the stated risk appetite.

Management at Stewart is responsible for managing those areas of the business which may affect or be affected by climate change.

Risk Management

Stewart's risk management framework outlines how we identify, assess, manage, monitor, and report on the risks to which our business is, or could be exposed, including climate-related risks. Climate considerations are embedded within our risk processes, including our Own Risk and Solvency Assessment (ORSA).

Mitigating risks while identifying and acting on opportunities that support Stewart's strategic, financial, and operational objectives is central to the success of our Enterprise Risk Management (ERM) program. The Chief Agent and Branch Management oversee the ERM and have established an ERM Committee to support this oversight. Chaired by the Chief Risk Officer, the ERM Committee includes representatives from key business units and provides regular updates on current and emerging risks and recommends enhancements to risk management processes.

Key elements of the ERM program include:

- Managing Risk within the defined governance structures,
- Applying an enterprise-wide approach to identify, assess, respond to, manage, monitor, and report on key risks in a timely manner
- Implementing risk management strategies aligned with the Stewart's risk profile, business strategy, risk appetite, key exposures, and tolerance thresholds
- Embedding risk considerations into business decision-making
- Communicating key risk information to the Chief Agent and Management
- Assessing climate risks
- Identifying and evaluating emerging risks that may impact Stewart.

Integrating Climate-Related Risks into Risk Management

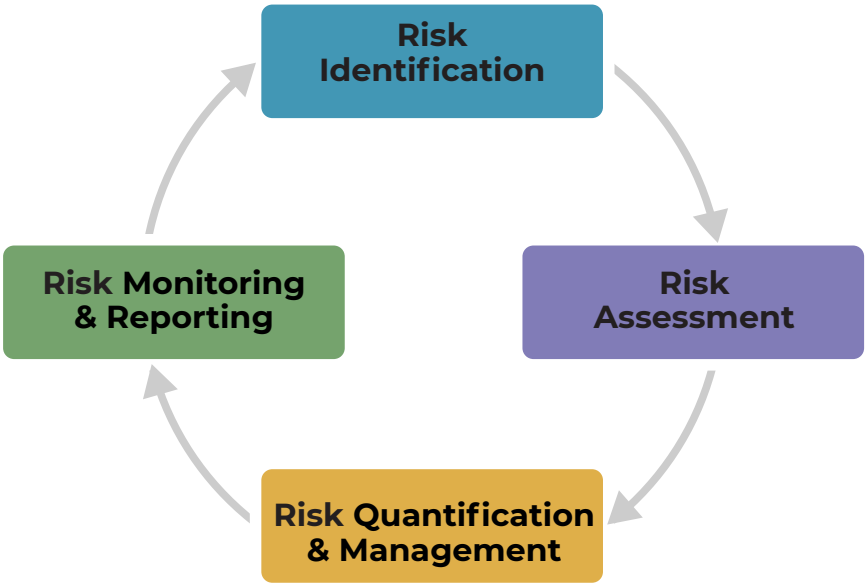
Stewart considers climate change to be a low to moderate risk to our business model and strategy. We continue to strengthen our resilience, to both transition and physical climate risks. Climate-related risks are incorporated into our risk policies and are addressed through our established risk management framework. In 2025, we further enhanced our climate risk capabilities by integrating climate considerations into our risk management and risk appetite frameworks, as well as updating related policies and ORSA. We have developed metrics and targets to improve our understanding and monitoring of climate-related risks and opportunities.

Identifying and Assessing Climate-Related Risks

Our risk identification process is used to assess potential exposure to transition and physical climate risks arising from external factors such as new climate policies, regulatory changes, or market shifts.

Once identified, risks undergo qualitative analysis to determine their potential impact on Stewart. Emerging risks are mapped based on the nature and magnitude of their potential impact. This assessment informs prioritization, management actions, and reporting requirements.

Stewart's Risk Management Framework



Key Components of ERM

- Risk appetite, tolerances, statement
- Capital management

Risk Controls

- Risk governance
- Committees
- Framework & policies

ERM Integration

- Risk culture
- Business planning

Monitoring and Managing Climate-Related Risks

We use metrics to monitor alignment with climate-related risks and assess potential financial impacts on our business, including carbon emissions. These measures support our ability to identify, measure, monitor, manage, and report on these risks.

The Chief Agent and management hold ultimate responsibility for Stewart risk oversight. This includes approving risk appetites annually and ensuring the establishment of effective controls to manage operational risks. The ERM Committee supports this oversight by reviewing financial and non-financial risk appetites, assessing the effectiveness of the risk management framework, recommending, and approving Stewart's exposure to financial and non-financial risks.

Reporting Climate-Related Risks

Stewart's Chief Risk Officer (CRO), with the assistance of the Climate Risk Committee sets the aggregate climate risk status based on the overall progress made, residual risk, time to event, where mitigation is necessary to maintain alignment with the climate risk appetite.

Climate Metrics

We use the following core metric to measure the potential financial impact of climate-related risks and opportunities on our business, our Scope 1 and Scope 2 emissions and overall progress against our targets.

Area	Climate Metric	Overview	Physical / Transition or Opportunity
Stewart Operations	Operational Carbon Emissions	Measure the operational carbon emissions in tCO2e. This covers Scope 1 and Scope 2.	Transition

These metrics are used to monitor risk appetite and measure progress against our targets. Whilst recognizing the limitations of the metrics (e.g., data availability, estimates and assumptions), we believe they are valuable in supporting our climate-related governance, strategy, and risk management. We utilize internal data, as well as external data, to produce these metrics.

Climate Reporting Policies

The principal reporting policies adopted in the preparation of the climate metrics are set out below. These policies have been consistently applied to all years presented, unless otherwise stated. The metrics provided cover the 2025 financial year (January 1, 2025, to December 31, 2025).

Greenhouse Gas (GHG) Protocol by Scopes

- **Scope 1:** Direct emissions from company-owned assets and controlled sources e.g., emissions from Stewart
- **Scope 2:** Indirect emissions released in production of electricity, steam, heating, or other energy purchased by Stewart
- **Scope 3:** Indirect emissions produced along Stewart's entire value chain

Greenhouse Gas Emissions

The GHG Protocol establishes a comprehensive global standardized framework to measure and manage GHG emissions. This framework underpins the measurement of our climate metric emissions.

Approach and Methodology

Stewart takes the operational control approach to carbon emissions reporting. This means that we account for 100% of the emissions from operations over which we have operational control. Stewart's GHG emissions including Scope 1 and Scope 2 from owned sources, as outlined in the tables below.

Materiality

We apply materiality based on the applicable rules and regulations for insurance entities in Canada, including consideration of our interactions with our stakeholders, society, the economy, and the natural environment throughout our value chain.

When reporting on the quantitative metrics outlined, we take a holistic view considering both quantitative and qualitative factors when determining the information that is important in communicating to our stakeholders. The uncertain external environment and the limitations in the availability of data underlying the reporting means that disclosure will evolve over time. As a result, we expect that certain disclosures made in this report are likely to be amended, updated, recalculated, and represented in the future.

Operational Targets

Stewart is committed to maintaining our absolute Scope 1 and Scope 2 emissions at or below 2025 levels through 2030, while aiming to improve emissions intensity as we grow. This target reflects our current low-carbon footprint, though we may adjust our approach over time to stay aligned with evolving business goals, improved data quality, and broader sustainability standards.

Emissions Disclosures

The following table summarizes our absolute gross greenhouse gas emissions:

Scope 1 Emissions (Direct Emissions)	2025	2024
Fugitive Emissions (tCO2e)	6	6
Mobile Emissions (tCO2e)	117	115
Total Scope 1 Emissions	**123**	**121**

Definition

Emissions from sources owned or controlled by the organization. This includes fuel combustion for company owned vehicles and refrigerant leakage from HVAC/refrigeration systems.

Methodology

- Fugitive emissions were calculated based on the types of refrigerant equipment used in offices, using EPA methodology to estimate refrigerant charge size, operating emission factors, and default refrigerants. The EPA Emissions Factors Hub was then used to obtain the applicable GWPs for each refrigerant type
- Mobile emissions were calculated using fuel consumption for all company vehicles operating across Canadian locations multiply the applicable fuel-specific emission factors

Calculation Reference

- EPA's Accounting Tool to Support Federal Reporting of Hydrofluorocarbon Emissions
- Annual consumption of gasoline is estimated based on Statistics Canada - Monthly average retail prices for gasoline and fuel oil, by geography
- EPA GHG Emission Factors Hub

Scope 2 Emissions (Indirect Energy Emissions)	2025	2024
Location-Based Emissions (tCO2e)	29	26
Total Scope 2 Emissions	**29**	**26**

Definition

Emissions from the generation of purchased electricity, steam, heating, or cooling purchased by the organization. This includes electricity consumption through landlord-provided services/charges (e.g., CAM) in all leased spaces.

Methodology

- Stewart applies the location-based approach using provincial grid emission factors. If landlord does not provide direct electricity consumption data, estimates are made using square footage or similar allocation metrics

Calculation Reference

- Provincial grid emission factors are from Reducing greenhouse gas emissions from refrigeration systems, version 1.0, Table 5.2: Electricity consumption intensities (g CO2e/kWh electricity consumed) for 2025

Total Emissions	2025	2024
Scope 1 Total (tCO2e)	123	121
Scope 2 Total (tCO2e)	29	26
Total Emissions (tCO2e)	**152**	**147**

Intensity Ratios	2025	2024
Total Emissions / Premiums Written (per million)	1.49	1.51
Total Emissions / Number of Employees	0.60	0.65

Stewart Title Guaranty Company

stewart.ca