

## Stewart Title Limited

### Tax Strategy

As part of a larger group of companies, Stewart Title Limited deals with its UK and worldwide tax matters with a commitment to compliance and transparency. Our policies and protocols are drafted to ensure that our filings are done on a timely and accurate basis. We engage tax experts to prepare our returns to insure current tax rules are applied. Annual tax filings and tax positions are subject to review by the company's independent external auditors.

### Working with HMRC

As a UK registered company, whenever a tax matter is presented to the company we speak with our tax experts to understand the issue and how best to present the matter to HMRC. It is important that we do sufficient work and/or research upfront so that HMRC receives from us the necessary facts to consider the matter.

### Tax Disclosure

As a title insurer in the UK market, Stewart Title Limited considers it a requisite part of its corporate citizenship to pay its calculated tax. As such the company does not engage in tax schemes which are speculative. While the company is protective of its proprietary data, it willingly discloses data, including tax data, where required and/or recommended by HMRC. Additionally, the UK company is reporting in the current year as required under the OECD guidelines for compliance with Base Erosion and Profit Shifting (BEPS) requirements.

### Tax Governance

In Stewart Title Limited, tax is part of the Finance function. As part of the required review of Corporate Policies, the Tax Policy is reviewed at least annually by the Board of Directors or when there are material changes to the Policy. Day to day and ad hoc tax issues are considered by the Finance department and expert counsel sought on a case by case basis.



Larry Thompson

International Controller / Director

20 December 2017