

Human Rights Policy

Effective: August 11, 2023

PURPOSE

Real Matters Inc. ("Real Matters" or the "Company") is a leading provider of residential real estate appraisal and title services to mortgage lenders in the United States and residential real estate and insurance inspection services in Canada. The Company is committed to creating a positive work environment that is diverse, equitable and inclusive and free of all forms of harassment and discrimination. In addition, Real Matters is committed to upholding human rights and fostering a responsible and fair work environment.

This Human Rights Policy reaffirms Real Matters' commitment to creating a positive work environment and respecting and promoting human rights throughout its organization and in its business relationships with clients, vendors and other business partners.

SCOPE

This Human Rights Policy encompasses all of the operations and activities of Real Matters and all of its subsidiaries, which collectively operate under the Real Matters, Solidifi and iv3 brands.

POLICY

Real Matters is committed to creating a positive work environment and respecting and promoting human rights throughout its organization and in its business relationships by:

1. maintaining an ESG Council that is responsible for developing and guiding the Company's ESG strategy and connecting these efforts throughout the organization, including efforts focused on creating a positive work environment and respecting and promoting human rights;
2. implementing and regularly updating a Code of Conduct that all Company employees, officers and directors are required to annually review and acknowledge their compliance with;
3. implementing and regularly updating a Supplier Code of Conduct that all independent contractors and vendors who do business with the Company are required to abide by as a condition of their engagement;
4. seeking to abide by internationally recognized human rights and labour standards, including, but not limited to, the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work;

5. upholding reasonable working conditions that, at a minimum, comply with all applicable employment laws, including, but not limited to, with respect to working hours, terms of employment, leaves of absence and compensation. The Company is committed to providing a fair and living wage to all employees;
6. providing a work environment for employees that promotes equality and dignity for all employees, including historically marginalized groups, and is free from unlawful discrimination or harassment on the basis of legally protected grounds;
7. upholding the right to health and safety for our employees by complying with our occupational health and safety policy and abiding by all applicable health and safety laws;
8. opposing all forms of modern slavery, forced labour and child labour abuse and striving to ensure the Company's business operations, and the operations of the Company's vendors and other business partners are free from these practices;
9. maintaining a whistleblower hotline for the Company through a third-party service provider which allows employees, officers, directors and other stakeholders (including the public) to raise questions, complaints or concerns about the Company's business practices;
10. recognizing the basic rights of freedom of association and the right for employees to join, assist and seek representation from labour unions and workers' councils and to bargain collectively in accordance with applicable laws without fear of reprisal, intimidation or harassment;
11. recognizing the right to water as a fundamental human right;
12. upholding the right to privacy for those individuals who entrust us with their personal information by complying with the Company's privacy policy and information security programs;
13. regularly communicating with our stakeholders to ensure alignment of our Human Rights Policy with their needs and expectations;
14. educating and training the Company's employees about the Company's Human Rights Policy and practices; and
15. striving for continuous improvement in our human rights practices.

ADMINISTRATION OF POLICY

The Company's ESG Council is responsible for the implementation and administration of this Policy. The Company's ESG Council, which is comprised of senior-level employees, meets at least quarterly to review the Company's progress on ESG-related matters, including human rights' initiatives, and to develop the Company's ESG-related strategy, reporting and action plan.

The Company's Board of Directors is ultimately responsible for overseeing the Company's corporate governance practices and principles, including the administration and execution of the Company's ESG strategy and reporting. Real Matters' Board of Directors has delegated to the Compensation, Nomination and Governance Committee ("CNGC") responsibility for advising the Board on corporate governance matters, including ESG-related matters. At least annually, the ESG Council (or a delegate on its behalf) will report to the CNGC and the Board on the Company's progress on ESG-related matters, including its human rights' initiatives. The Company's progress towards achieving its objectives will also be included in periodic, public updates to its sustainability report.

REVIEW OF THE POLICY

The Company's ESG Council will review this Human Rights Policy at least annually and as otherwise determined to be appropriate and make recommendations to the CNGC and the Company's Board of Directors, as applicable, regarding any proposed updates.