



# CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

Issuing Department:  
*Corporate Compliance*

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## 1. Introduction

The Board of Directors of Fidelity National Financial, Inc. (together with its subsidiaries, the “Company”) has adopted this Code of Ethics for Senior Financial Officers (this “Code”) which is applicable to its Chief Executive Officer, Chief Financial Officer, and Chief Accounting Officer (the “Covered Officers”) to:

- Promote honest and ethical conduct, including the ethical handling of conflicts of interest;
- Promote full, fair, accurate, timely, and understandable disclosure;
- Promote compliance with applicable laws and governmental rules and regulations; and
- Deter wrongdoing.

## 2. Act with Integrity

Each Covered Officer owes a duty to the Company to act with integrity. Integrity requires, among other things, being honest and candid. Deceit and subordination of principle are inconsistent with integrity. Each Covered Officer must:

- Act with integrity, including being honest and candid while still maintaining the confidentiality of information where required or consistent with the Company’s policies.
- Observe both the form and spirit of laws and governmental rules and regulations, accounting standards and Company policies.
- Adhere to a high standard of business ethics.

## 3. Avoid Conflicts of Interest

A conflict of interest occurs when an individual’s private interest interferes or appears to interfere with the interests of the Company. A conflict of interest can arise when a Covered Officer takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. For example, a conflict of interest would arise if a Covered Officer, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company.

Service to the Company should never be subordinated to personal gain and advantage.

Each Covered Officer must:

- Avoid conflicts of interest wherever possible.
- Discuss any material transaction or relationship that could reasonably be expected to give rise to a conflict of interest with the Company’s General Counsel.
- In the case of Covered Officers, other than the Chief Executive Officer, obtain the prior written approval of the General Counsel for all material transactions or relationships that could reasonably be expected to give rise to a conflict of interest. The General Counsel will submit a list of those approvals semi-annually to the Audit Committee for its review.
- In the case of the Chief Executive Officer, obtain the prior written approval of the Audit Committee for all material transactions that could reasonably be expected to give rise to a conflict of interest.
- The Audit Committee may delegate authority to review and approval material transactions to the Related Person Transaction Committee.

Some clear conflict of interest situations that should always be approved by the General Counsel or, in the case of the Chief Executive Officer, the Audit Committee, if material, include the following:

- Any significant ownership interest in any supplier or customer;
- Any consulting or employment relationship with any customer, supplier, or competitor;
- Any outside business activity that detracts from an individual's ability to devote appropriate time and attention to his or her responsibilities with the Company;
- The receipt of non-nominal gifts or excessive entertainment from any company with which the Company has current or prospective business dealings;
- Being in the position of supervising, reviewing or having any influence on the job evaluation, pay or benefit of any immediate family member; and
- Selling anything to the Company or buying anything from the Company, except on the same terms and conditions as comparable officers or directors are permitted to so purchase or sell.

Anything that would present a conflict of interest for a Covered Officer would likely also present a conflict of interest if it is related to a member of his or her family.

## 4. Disclosure

Each Covered Officer is required to be familiar with and comply with the Company's disclosure controls and procedures applicable to him or her so that the Company's public reports and documents filed with the Securities and Exchange Commission (the "SEC") comply in all material respects with the applicable federal securities laws and SEC rules. In addition, each Covered Officer having direct or supervisory authority regarding these SEC filings or the Company's other public communications concerning its general business, results, financial condition and prospects should, to the extent appropriate within his or her area of responsibility, consult with the other Company officers and employees and take other appropriate steps regarding their disclosures with the goal of making full, fair, accurate, timely and understandable disclosure.

Each Covered Officer must:

- Familiarize himself or herself with the disclosure requirements applicable to the Company as well as the business and financial operations of the Company.
- Not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including the Company's independent auditors, governmental regulators and self-regulatory organizations.
- Properly review and critically analyze proposed disclosure for accuracy and completeness (or, where appropriate, delegate this task to others).

## 5. Compliance

It is the Company's policy to comply with all applicable laws and governmental rules and regulations. It is the personal responsibility of each Covered Officer to adhere to the standards and restrictions imposed by those laws, rules and regulations, including those relating to accounting and auditing matters.

## 6. Reporting and Accountability

The Audit Committee is responsible for applying this Code to specific situations in which questions are presented to it and has the authority to interpret this Code in any particular situation. Any Covered Officer

who becomes aware of any existing or potential violation of this Code is required to notify the General Counsel promptly. Failure to do so is itself a violation of this Code.

Each Covered Officer must not retaliate against any employee or other Covered Officer for reports or potential violations that are made in good faith.

If a violation has occurred, the Company will take such disciplinary or preventative action as it deems appropriate, after consultation with the Audit Committee.

The Company will follow the following procedures in investigating and enforcing this Code and in reporting on this Code:

- Violations and potential violations will be reported by the General Counsel to the Audit Committee after appropriate investigation.
- The Audit Committee will take all appropriate action to investigate any violations reported to it.
- If the Audit Committee determines that a violation has occurred, it will inform the Board of Directors.
- Upon being notified that a violation has occurred, the Board of Directors will take such disciplinary or preventative action as it deems appropriate, up to and including dismissal or, in the event of criminal or other serious violations of law, notification of the SEC or other appropriate law enforcement authorities.
- Any changes to or waivers of this Code will, to the extent required, be promptly disclosed as provided by SEC rules.

## 7. Contact

For more information on this Policy, contact the Corporate Compliance Department at [corporatecompliance@fnf.com](mailto:corporatecompliance@fnf.com).

## 8. Related Policies and Procedures

The Company's more detailed policies and procedures set forth in its Code of Business Conduct and Ethics are separate requirements applying to Covered Officers, and are not part of this Code.

## 9. Approvers

Approver Name	Approver Title	Date Approved
Chauncy Peters	Corporate Compliance Program Manager	01/17/2024
Katie Schmidt	Chief Regulatory Officer	01/17/2024
Paul Perez	Chief Compliance Officer	01/30/2024

## 10. Revision History

Date of Revision	Revision Author	Brief Revision Description
February 2016	Mary Richard	Revised and reformatted using new template and standards.
January 2017	Mary Richard	Annual review; no changes.
December 2017	Mary Richard	Minor changes.
December 2018	Katie Schmidt and Mary Richard	Annual review; no changes.
November 2019	Katie Schmidt and Chauncy Peters	Annual review; no material changes.
December 2020	Katie Schmidt and Chauncy Peters	Annual review; no material changes.
January 2021	Katie Schmidt and Chauncy Peters	Annual review; no material changes.
January 2023	Katie Schmidt and Chauncy Peters	Annual review; no material changes.
May 2023	Katie Schmidt and Ellye Aull	Updated Section 3 to reflect Related Person Transaction Committee authority.
January 2024	Katie Schmidt and Chauncy Peters	Annual review; no changes.

## 11. Statement of Confidentiality

The information contained in or supplied with this document, in its entirety, is the confidential and proprietary information of FNF, and it may not be copied by or disclosed to any person or entity (other than to the intended recipients), without the prior written consent of FNF.