



Precepts in Action

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CODE OF BUSINESS CONDUCT & ETHICS

.....

February 2024



A Message from Michael J. Nolan, Chief Executive Officer

Dear Fellow FNF Employees:

Fidelity National Financial, Inc. has outlined six core values that represent the cornerstone of our management philosophy for operational success. I challenge each of you to use these precepts as a foundation for every decision you make in the workplace. The six precepts are:

**Autonomy and Entrepreneurship | Bias for Action
Customer-Oriented and Motivated | Minimize Bureaucracy
Employee Ownership | Highest Standard of Conduct**

The most important precept, “Highest Standard of Conduct,” means we are all expected to maintain the highest standard of business conduct and ethics. To achieve this objective, we are each responsible for behaving in a manner that reflects positively on both our personal reputation and the reputation of our company.

This Code of Business Conduct and Ethics is a resource for applying our values and ensuring a consistent understanding of what FNF expects of you, and what our customers, business partners, and shareholders expect of us. It is intended to help resolve compliance and ethics issues by providing you with the information, tools and resources necessary to make good, ethical decisions. However, no code can provide answers for every situation that may arise. In the end, we rely on you to use sound judgment to make the right decision and to do the right thing.

It is important to read this Code to understand your role and responsibilities as an FNF employee.

Thank you for doing your part to ensure our ongoing success and our adherence to the Highest Standards of Conduct.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael J. Nolan'. The signature is fluid and cursive, written over a light blue geometric pattern.

Michael J. Nolan
Chief Executive Officer

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UNDERSTANDING OUR CODE

Introduction

Scope

Compliance with the Code

Administration

Employee Handbook

Supplemental Policies

Amendment or Modification
of the Code

Waivers

Introduction

FNF is committed to maintaining the highest legal and ethical standards in every aspect of our business. This Code of Business Conduct and Ethics (“Code”) is intended to provide information, support and resources so that we act ethically and in compliance with the laws and regulations that affect our business. Adherence to this Code is vital for FNF to continue to preserve the Company’s reputation for honesty and strong ethical standards.

Scope

This Code applies to every employee, contractor, officer, and director of Fidelity National Financial, Inc., its majority-owned subsidiaries and controlled affiliates (collectively referred to as “FNF” or the “Company”).

For purposes of this Code, a “controlled affiliate” means any business in which FNF has the ability, through equity ownership or otherwise, to direct the policies and practices of the enterprise. For convenience, the term “employee” is used throughout this Code as a designation that includes employees, contractors, officers, and directors.

Compliance with the Code

Compliance with the terms of this Code is a condition of employment or other relationship with FNF. Conduct in violation of these standards is unacceptable and will be considered in all cases to be outside the scope of the employee’s employment. Anyone who engages in misconduct, violates this Code, or otherwise fails to meet FNF standards may be disciplined up to and including termination of employment or other relationship with FNF, and may subject the violator to civil and/or criminal charges.

Administration

The FNF Chief Compliance Officer is responsible for the administration of this Code under the direction of the Audit Committee of the FNF Board of Directors.

Employee Handbook

The requirements of this Code are intended to be in addition to policies contained in the Employee Handbook. Where provisions of the Employee Handbook conflict with provisions of this Code, the provisions of this Code control.

Supplemental Policies

This Code may be supplemented with other corporate or operational policies to address specific areas of concern. Unless specifically indicated, such supplemental policies shall not be deemed to conflict with or supersede the provisions contained in this Code.

Amendment or Modification of the Code

This Code may be amended or modified at any time by the Chief Compliance Officer. The current version of this Code is available on the Company's website.

Waivers

Waivers of this Code may be granted to directors or executive officers only by the FNF Board of Directors or by the Audit Committee of the FNF Board of Directors. Such waivers will be disclosed as may be required by the rules and regulations of the Securities and Exchange Commission and the New York Stock Exchange.



DUTY TO REPORT VIOLATIONS

Reporting Possible Violations
Compliance and Ethics Hotline
Investigations
Non-Retaliation Policy

Reporting Possible Violations

As part of our commitment to adhere to the Highest Standard of Conduct, we have adopted the policy of requiring employees to report any actual or suspected illegal or unethical conduct. **Failure to report misconduct or violations of the law, this Code, or Company policy may result in disciplinary action, up to and including termination of employment or other relationship with FNF.**

If you have any questions regarding the best course of action in a particular situation, or if you suspect a possible violation of the law, this Code, or Company policy, promptly contact any of the following:

- Immediate supervisor
- Human Resources Department
- Corporate Compliance Department
- Legal Department; or
- Compliance and Ethics Hotline

Compliance and Ethics Hotline

For calls within the U.S.: 855-FNF-TIPS (855-363-8477)

For International Calls: 011-877-597-7454

To Report Online: <https://fnf.ethicspoint.com>

FNF maintains a toll-free Compliance and Ethics Hotline that is operated by an independent third-party vendor and is available 24 hours a day, 7 days a week. You may call the hotline to report suspected misconduct, raise concerns about compliance and ethics matters, or ask questions. You may remain anonymous when calling the hotline; however, you are encouraged to leave your name and contact information in case additional information is required to thoroughly investigate the matter.

Q&A

I observed a situation that I suspect might be a violation of our Code of Business Conduct and Ethics. Should I report the situation even though I am not certain a violation has occurred?

Yes, you should report the situation. No adverse action will be taken against you for making a report in good faith, regardless of whether the report proves well-founded.

Investigations

FNF's Corporate Compliance Department, Legal Department, Human Resources Department, or the Audit Committee may conduct investigations as deemed appropriate into suspected violations of the law, this Code, or Company policy. Employees are required to cooperate fully with any internal or external investigation. Making false statements to or otherwise misleading internal or external auditors, FNF counsel, FNF representatives, or regulators is grounds for immediate termination of employment or other relationship with FNF, and may also be a criminal act that can result in severe penalties. Employees should never withhold or fail to communicate information that raises ethical or legal questions. If it is found that misconduct has occurred, FNF is committed to taking prompt action to correct the situation and, when appropriate, discipline responsible individuals.

Non-Retaliation Policy

FNF prohibits retaliation against any employee who reports a concern in good faith or participates in good faith in an investigation related to a report, whether the report is made to FNF or to a government official or agency.

If you have a specific concern in any of the following areas, you may also contact:

For Violations of:

Any law, this Code, or Company Policy

Corporate Compliance Department
corporatecompliance@fnf.com

Financial Reporting, Accounting, or Auditing Policies or Procedures

Audit Services Department
904.854.8836

Employee Handbook

Your Local HR Representative or Corporate Human Resources



INDIVIDUAL RESPONSIBILITY

Employee Responsibilities

Manager Responsibilities

FNF is made up of thousands of people, each with unique values and aspirations. One of the responsibilities we share is to act with honesty and strong ethical standards.

Employee Responsibilities

As an employee, you are responsible for:

- Complying with all laws, rules and regulations, this Code, and Company policies.
- Seeking guidance if you have any questions about specific compliance concerns or proper conduct.
- Promptly raising concerns and reporting suspected illegal or unethical conduct.
- Cooperating fully with any internal or external investigation.
- Never retaliating against an employee for refusing to violate this Code or for reporting in good faith suspected misconduct.

Manager Responsibilities

Managers are required to exemplify the highest standards of ethical and responsible business conduct and to promote an environment in which compliance and ethical behavior is expected. If you manage others, you are responsible for:

- Ensuring employees who report to you understand and comply with all laws, rules and regulations, this Code, and Company policies.
- Assisting employees with questions or concerns about compliance and ethics issues.
- Addressing employees' reports of suspected misconduct.
- Taking reasonable measures to detect and deter misconduct.
- Demonstrating appropriate leadership to promote compliance.



RESPONSIBILITY TO EACH OTHER

Respect and Fair Treatment

Equal Employment Opportunity

Harassment, Discrimination,
and Bullying

Alcohol and Drug Use

Safety

Employees' Confidential
Information

For additional information on topics covered in this section, please refer to the Employee Handbook.

Respect and Fair Treatment

Our success as a company and as individuals depends on the unique contributions of the people with whom we work. We sustain an ethical culture by treating each other with honesty, respect and fair treatment.

Equal Employment Opportunity

FNF is committed to providing equal employment opportunity. All decisions regarding personnel actions are to be based upon demonstrated abilities, achievements and experience, and made without discrimination. It is the responsibility of all employees to ensure that the Company's policy regarding equal employment opportunity is implemented in all phases of human resources administration.

Harassment, Discrimination, and Bullying

FNF values a work environment where diversity is embraced and where employees' differences are valued and respected. FNF provides a work environment that is free from intimidation, hostility and other behaviors that might interfere with work performance. FNF prohibits any kind of discrimination, harassment, or bullying, whether committed by or against a supervisor, co-worker, customer, vendor, or visitor.

Discrimination, harassment, and bullying, whether based on a person's race, gender, gender identity or expression (including transgender status), color, creed, religion, national origin, citizenship, pregnancy, age, physical or mental disability, marital status, sexual orientation, ancestry, veteran status, socioeconomic status, or any other characteristic protected by applicable laws and regulations, are strictly prohibited.

Q&A

I have received a joke via email that is sexually suggestive from a co-worker in my office. What should I do about this?

You should contact your supervisor, your Human Resources representative, or the Compliance and Ethics Hotline to report your concern. FNF systems should never be used to transmit emails that are offensive or lewd in nature.

Q&A

I know that some of the information I work with is confidential. Does that mean that I cannot talk about it with anyone, even other employees?

Confidential information should be discussed only with those who need to know for Company business. If you have any questions about the confidentiality of the information with which you work, talk to your supervisor.

If you believe you are being subjected to discrimination, harassment, or bullying, or if you observe or receive a complaint regarding such behavior, promptly report it in accordance with the reporting provisions of this Code.

DO THE RIGHT THING

- Never take part in conduct that is hostile or threatening nor encourage others to do so.
- Never use FNF systems to transmit or receive electronic images or text (such as email jokes) of a sexual nature or containing ethnic slurs, racial epithets or any other material of a harassing, offensive or lewd nature.

For more information on this topic, refer to the Harassment, Discrimination, and Bullying Policy and the Americans with Disabilities Act Compliance Policy.

Alcohol and Drug Use

Alcohol and drug use jeopardizes safety and negatively impacts work performance. You should not possess, distribute, use, or be under the influence of illegal drugs, alcoholic beverages, or other intoxicants while on the job.

For more information on this topic, refer to the Alcohol and Drug Policy.

Safety

FNF is committed to providing a safe work environment and maintaining compliance with all local, state and federal laws regarding safety. Internal guidelines have been developed to help maintain a safe and healthy work environment.

For more information on this topic, refer to the Safety Handbook.

Employees' Confidential Information

FNF respects and protects employees' confidential information. Consistent with applicable laws, FNF limits access to these records to Company personnel who have appropriate authorization and a clear business need for the information. If you have access to employees' personal information, including payroll and medical records, you have an obligation to treat it confidentially.



RESPONSIBILITY TO OUR CUSTOMERS AND BUSINESS PARTNERS

Fraud

Improper Payments

Protection of Customers' Personal Information

Protection of Cardholder Information

Regulatory Policies

Contact with Government Officials

Doing Business with Prohibited Persons

Antitrust and Fair Competition

Specific Antitrust Concerns

Anti-Boycott Laws

Fraud

Employees are expected to be vigilant in discovering evidence of possible fraud. Fraud is any material misrepresentation or deliberate act of an employee, customer, agent, or contract service provider (for example, an outside attorney, accountant, or industry insider, such as an appraiser, mortgage broker, realtor or real estate agent) with the purpose of deceiving or cheating FNF, its shareholders, customers, employees, lenders, regulators, or business partners. Employees are required to report evidence of suspected fraud in accordance with the reporting provisions of this Code.

Examples of Fraud:

- Forgery or alteration of checks, securities, invoices, policies, escrow documents or accounting records;
- Misappropriation of FNF funds, securities, supplies, furniture, equipment or other assets;
- Misuse of or irregularity in handling and reporting escrow, trust or indemnity funds;
- Material misrepresentation or omission of information with the intent to deceive or mislead a lender into extending credit that would likely not be offered if the true facts were known; or
- Any fraud committed with the intent to steal money from a lender.

For more information on this topic, refer to the Anti-Fraud Policy.

Improper Payments

The use of FNF funds for any unlawful purpose or in violation of stated Company policies is prohibited. No bribes, kickbacks or similar remuneration or consideration of any kind are to be given or offered to any individual, organization, government, political party or other entity or representative thereof, for any reason.

Protection of Customers' Personal Information

The Safeguards Rule, implemented as part of the Gramm-Leach-Bliley Act, and other federal and state laws and regulations provide specific guidelines regarding the privacy, protection and security of customers' personally identifiable information.

Additionally, the federal Fair Credit Reporting Act (FCRA), as amended by the Fair and Accurate Credit Transactions Act of 2003 (FACTA), is, among other things, meant to ensure the accuracy, proper use and protection of a customer's personal financial information contained in a consumer credit report. The use of personal financial information of a customer contained in a consumer credit report is also governed by the laws of many states.

The goal of these laws and regulations is, among other things, to prevent identity theft. Employees must strictly comply with Company policies and relevant laws and regulations relative to the protection and use of customers' personal information.

For more information on this topic, refer to the Clean Desk Policy, Information Security Policy, and Privacy Policy.

Protection of Cardholder Information

If your position involves the processing, storage and/or transmission of cardholder information, you are required to protect such data in accordance with Company policies relative to the protection of cardholder information.

For more information on this topic, refer to the Card Processing Policy.

DO THE RIGHT THING

- Never provide a customer's personal, financial or cardholder information to a person not authorized to receive that information, including unauthorized fellow employees.
- If you are sending a customer's personal, financial or cardholder information to a person authorized to receive it, always send such information by secured transmittal, such as via encrypted email.
- Never obtain information on a customer from a consumer reporting agency under false pretenses.

Regulatory Policies

In conducting business on behalf of FNF, you should be familiar with and carefully consider the following regulatory policies:

► Real Estate Settlement Procedures Act (RESPA)

Strictly enforced federal and state laws prohibit any person from giving or receiving any payment, advance, loan, service, or other consideration in return for the referral of real estate settlement services business.

The Integrated Mortgage Disclosures under the Real Estate Settlement Procedures Act (Regulation X) and the Truth-in-Lending Act (Regulation Z) describes the proper preparation and delivery of the Disclosures required under these acts.

Q&A

One of my customers has asked me to pay part of the seller's proceeds to the buyer in a transaction I am handling for him. He has also asked that I not disclose this to the lender or show the payment on the closing statement. Would this be okay since I have a long-standing relationship with this customer?

No, this is not okay under any circumstance. This type of payment could be seen as a kickback and/or mortgage fraud. All disbursements must be accurately disclosed on the closing statement and approved by the lender financing the transaction. Any questions on this topic should be referred to National Escrow Administration, Corporate Compliance Department or the Compliance and Ethics Hotline.

Q&A

I have been asked to change information on a closing statement that is not representative of the disbursements that were made during the transaction. Should I make the requested changes?

Closing statements must always be completed accurately. It is to be used as a statement of actual charges and adjustments paid by the borrower and the seller. If you are asked to make changes to the closing statement that do not accurately reflect the facts of the transaction, you should contact your supervisor, National Escrow Administration, Corporate Compliance Department or the Compliance and Ethics Hotline.

DO THE RIGHT THING

- Do not provide a payment or anything of value to any party in a position to refer settlement services business, except as compensation for goods or facilities actually furnished or services actually performed.

► False Claims Act

The False Claims Act is the principal method utilized by the Department of Justice and private citizens to identify and combat fraud committed against the federal government. The basic provisions of the False Claims Act create statutory liability for knowingly presenting a false claim to the federal government for payment or approval. The Act also prohibits knowingly using or making false records to obtain any fraudulent payment or approval. Violations of these provisions can result in severe criminal, civil and administrative sanctions, including imprisonment, fines, treble damage awards, disbarment from participation in federally administered programs, and suspension or revocation of individual and corporate licenses.

DO THE RIGHT THING

- Do not participate in any transaction that is or gives the appearance of the submission of a false claim, statement or record to the federal government, any state government or any other party.
- Do not present a false claim, statement or record, or fail to disclose all closing items or closing actions inconsistent with the settlement statement or facts.
- Accurately complete the closing statement, with a record of receipts and disbursements made at closing, consistent with those instructions and facts known at the time.
- Obtain approval from your supervisor before making any post-closing amendment to a closing statement or estimated closing cost statement.

Contact with Government Officials

Many countries, states and local jurisdictions have anti-bribery and anti-corruption laws restricting gifts (meals, entertainment, transportation, lodging or other things of value) that may be provided to government officials. In the U.S., the Foreign Corrupt Practices Act of 1977 ("FCPA") outlines very serious prohibitions against bribery, including the payment or promise of payment of anything of value with corrupt intent, to foreign officials (including any person employed by or representing a

Q&A

I am working with an agent in a foreign country. I have some concern that some of the money we are paying the agent may be going toward paying bribes to government officials, but I have no actual knowledge that bribes have been paid. Should I report my concerns?

Yes, you should report your concerns in accordance with the reporting provisions of this Code. FNF does not approve and can be held liable for bribes made to foreign government officials, even if an agent or subcontractor makes the bribes.

foreign government, officials of a foreign political party, officials of public international organizations and candidates for foreign office) in order to obtain or retain business or to secure an improper advantage.

Improper gifts, payments or offerings of anything of value to foreign officials could be a violation of anti-bribery and anti-corruption laws and could jeopardize the Company's growth and reputation. Payments made indirectly through a consultant, contractor or other intermediary are also prohibited.

DO THE RIGHT THING

- Do not give a gift of any kind to a government official without obtaining prior approval from FNF's Chief Compliance Officer.
- Do not offer anything of value to a government official for the purpose of influencing the recipient to take or refrain from taking any official action, or to induce the recipient to conduct business with FNF.

For more information on this topic, refer to the Anti-Corruption Policy and the Gift and Entertainment Policy.

Doing Business with Prohibited Persons

FNF fully complies with United States economic sanctions and embargoes restricting U.S. persons, corporations and, in some cases, foreign subsidiaries from doing business with certain countries, groups and individuals, including organizations associated with terrorist activity and narcotics trafficking. Economic sanctions prohibit doing business of any kind with targeted governments and organizations, as well as individuals and entities that act on their behalf. Sanction prohibitions also may restrict investment in a targeted country, as well as trading in goods, technology and services (including financial services) with a targeted country. U.S. persons may not approve or facilitate transactions by a third party that the U.S. person could not do directly.

For more information on this topic, refer to the Office of Foreign Assets Control Policy and Procedure.

Antitrust and Fair Competition

FNF is committed to free and fair competition, competing ethically and complying with antitrust and competition laws. These laws prohibit any agreement or understanding between or among a company and its customers, suppliers, or competitors that unreasonably limits fair competition. Failure to adhere to these laws can lead to severe penalties for

Q&A

I have heard that trade association members should avoid certain activities and discussions at meetings. What are the issues that should be avoided?

Remember that members of trade associations may also be our competitors. Therefore, you should avoid meetings or discussions regarding rates, prices, types or terms of policy coverage, allocation of territories, or agents used by the Company.

both FNF and the responsible employee(s). FNF will not tolerate or participate in any business conduct, transaction or activity that violates the antitrust and competition laws of any country in which we do business.

DO THE RIGHT THING

- Deal fairly with customers, shareholders, regulators, agents, business partners, service providers, suppliers, competitors, and employees.
- Do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information or misrepresentation of material facts.

Specific Antitrust Concerns:

► Trade Associations

Membership and attendance at trade association functions are recognized methods of furthering legitimate business interests of FNF. However, trade association groups also provide a setting at which the temptation may be present for competitors to discuss matters that may constitute violations of antitrust laws.

For trade association meetings or committee meetings at which sensitive items such as coverages may be discussed, a written agenda should be distributed in advance of the meeting and the agenda should be followed during the course of the meeting. Other sensitive areas would include discussion of the establishment of product standards or information sharing between members of the association. Antitrust counsel should be present at any trade association meeting at which these or any similar subjects are discussed. It is FNF's position that a trade association should not be used to police what are perceived to be illegal or unethical practices within the industry.

DO THE RIGHT THING

- Do not discuss with competitors rates, prices, types or terms of policy coverage or allocation of territories, customers or agents. If such discussions begin, immediately announce that you are leaving and the reason you are leaving. If minutes are being recorded for the meeting, ask that these actions be noted in the minutes.

Q&A

A local agent that controls a large market share in our area would like to enter into an exclusive dealing contract with us. Is it okay to enter into such an agreement?

It may be, but these types of arrangements raise many legal and antitrust issues. Before entering into any such agreement, contact the Corporate Compliance Department.

▶ **Title Plant Facilities**

In many areas of the country, it has been found to be economically more efficient for several title underwriters or agents to maintain title plant facilities jointly. In light of the economic efficiency these plants promote, such arrangements are permitted as long as the title plant facilities are not used in order to exclude other competitors from the marketplace. For instance, antitrust issues may be raised if the members of a joint plant deny a third-party access to the plant. Allegations that members of a joint plant conspired to boycott a third-party who is not a member of a joint plant can carry serious antitrust overtones.

DO THE RIGHT THING

- Given the sensitive and complicated legal implications, any employees involved in the creation or ongoing operation of a joint title plant must consult with the Legal Department concerning proper conduct and applicable legal documents.

▶ **Controlled Business Arrangements**

Controlled business arrangements may have antitrust overtones in those cases where a significant market share may be affected by the owners of the agency. For example, the execution of an exclusive agency agreement with an agent which is controlled by a large number of business providers such as attorneys, lenders or real estate brokers might promote an antitrust challenge if a very large market share is controlled by the agency. Agency contracts which limit an agent to just one underwriter (exclusive dealings) or which appoint an agent as the underwriter's sole supplier in a given territory (exclusive distributorship) are the types of agreements that may raise antitrust issues. Controlled business arrangements have been the source of much controversy and tend to raise a great many legal issues in addition to the traditional antitrust concerns.

DO THE RIGHT THING

- Consult with the Corporate Compliance Department before entering into any arrangements with an agent that controls a significant amount of its business.

► **Rating Bureaus**

Participation in state authorized rating bureaus has become subject to increased scrutiny at the federal and state level. No such activity is authorized without the Legal Department's involvement in close consultation with outside antitrust counsel on a continuing basis. State authorized rating bureau activity, whether it involves title insurance risk rates or other rates, may be protected under the McCarran-Ferguson Act or the Noerr-Pennington, state action, or filed rate doctrines, or any number of other federal or state exemptions or defenses.

DO THE RIGHT THING

- In order to secure the application of one or more of the protections for rating bureau activity, the Legal Department must be consulted to monitor all such activity.

Anti-Boycott Laws

In general, anti-boycott laws prohibit the following actions (and agreements to take such actions) that could further any boycott not approved by the United States government:

- refusing to do business with other persons or companies (because of their nationality, for example);
- discriminating in employment practices;
- furnishing information on the race, religion, gender or national origin of any U.S. person; or
- furnishing information about any person's affiliations or business relationships with a boycotted country or with any person believed to be blacklisted by a boycotting country.

FNF is required to report any request to take action, or any attempt to reach agreement on such action, that would violate these prohibitions.

DO THE RIGHT THING

- Understand the policies of your department that are designed to ensure compliance with anti-boycott laws.
- Be alert to the fact that boycott-related requests can be subtle and indirect.
- Report any boycott-related concerns to the Corporate Compliance Department.



RESPONSIBILITY TO OUR COMMUNITIES

Investor Relations

Media Requests

Government Requests

Community and Professional
Involvement

Individual Political Activity

Corporate Political
Contributions

Charitable Contributions

Lobbying Activities

Public Office

Environmental Protection

Investor Relations

As a publicly-traded company, FNF has a responsibility to provide reliable and timely information about our Company's operations and performance. Only authorized employees may respond to inquiries from the investment community. Refer all requests for investor-related information to the Investor Relations Department at <https://www.investor.fnf.com/ir-resources/contact-ir>.

Media Requests

Media and press calls require careful handling and, therefore, only authorized employees may respond to such requests. Refer all media and press requests to the Corporate Communications and Marketing Department at FNTGMarketing@fnf.com.

For more information on these topics, refer to the Media Policy.

Government Requests

FNF cooperates fully with requests made by government agencies and authorities, including taxing authorities and insurance regulators, through authorized employees only. All requests from government agencies and authorities for information should be immediately referred to the Corporate Compliance Department.

Employees authorized to communicate with government officials must be truthful and accurate in all representations. Deliberate misstatements (verbal or written) to government officials, or false statements made with a reckless disregard for accuracy, can expose both FNF and the employee to criminal penalties.

Q&A

I received a request for information from an insurance regulator. How should I respond?

All requests from government agencies and authorities should be immediately forwarded to the Corporate Compliance Department at corporatecompliance@fnf.com.

Community and Professional Involvement

FNF encourages employees to participate in and provide leadership to community and professional activities. Employees who participate in such community activities are doing so as individuals and not as representatives of FNF unless specifically authorized to do so.

Employees are permitted to hold director and trustee positions in other organizations; however, these positions may have legal consequences or other ramifications to FNF. Your immediate supervisor must approve any such direction, and a copy must be sent to corporatecompliance@fnf.com.

Individual Political Activity

FNF respects the right of its employees to participate in the political process and encourages them to engage in political activities. If an employee chooses to participate in the political process, he or she must do so as an individual and not as an FNF representative.

Employees may not work on political activities while on company time or use FNF property or facilities for these activities. No one at FNF may require an FNF employee to contribute to, support or oppose any political group or candidate.

DO THE RIGHT THING

- Do not use your job title or other employee identity to suggest that FNF supports a particular candidate, political position or political party.
- Never use FNF's letterhead in connection with your role in a political campaign or support of a political position or party.

Corporate Political Contributions

U.S. federal law and the laws of certain states generally prohibit a corporation from making political contributions. Accordingly, any proposed U.S. political contribution or expense incurred by FNF must be approved in advance by the Legal Department. This prohibition includes monetary contributions, "in-kind" contributions (i.e., the use of facilities for a fundraiser, purchase of tickets for receptions or dinners, advertisements in journals or payment for services) and gifts to officials.

Q&A

A business colleague and long-time friend of mine is running for the U.S. Senate. Is it okay to make a contribution on behalf of FNF in support of her candidacy?

No. Under no circumstance should political contributions be made on behalf of FNF to candidates for any federal office.

Under no circumstance shall political contributions be made on behalf of FNF to candidates for federal office. When political contributions (other than contributions to candidates for federal office) are permitted, under no condition shall political contributions be made or conditioned upon a recipient's agreement or understanding to take or refrain from taking any particular governmental action on behalf of FNF.

DO THE RIGHT THING

Unless specifically authorized by FNF:

- Do not make contributions on behalf of FNF in support of candidates for state or local office or in support of any political position or party (contributions in support of candidates for federal office are strictly prohibited).
- Do not make payments or contributions, or give gifts or anything of value on FNF's behalf, directly or indirectly, to officials, employees of any government or instrumentality, any political party, any official of a political party, or any candidate for political office.

Charitable Contributions

FNF regularly contributes to bona fide charities that promote the wellbeing of the communities in which we do business. However, charitable giving can present corruption risk in that donations could be a disguise for bribery. Before making a charitable contribution on behalf of FNF or its subsidiaries, refer to the procedures outlined in the Charitable Contributions section of the Anti-Corruption Policy and the Gift and Entertainment Policy.

Lobbying Activities

Lobbying activity generally includes attempts to influence the passage or defeat of legislation, which may trigger registration and reporting requirements. The U.S. government and many states extend the definition of lobbying activity to cover efforts to influence rulemaking by executive branch agencies or other official actions of agencies, including the decision to enter into a contract or other financial arrangement.

Employees should not engage in lobbying activities on behalf of FNF. Some FNF employees are specifically authorized to lobby or otherwise communicate with elected officials or government employees on behalf of FNF. Due to the complexity of laws dealing with lobbying, all planned contacts with such individuals are subject to prior written approval from the Legal Department.

DO THE RIGHT THING

- Do not engage in lobbying activities on behalf of FNF unless you are expressly authorized to do so.

Public Office

Before accepting nomination or appointment of any public office (appointed or elected), you must obtain prior written approval from your supervisor and the Corporate Compliance Department. Statutory requirements may render such appointment or election to public office improper unless assurances are given that business relations between FNF and the government agency in which you would serve would not be prohibited. In the event that the appointment involves FNF's Chief Executive Officer, the CEO must seek approval from FNF's Board of Directors to obtain authorization for such nomination or appointment.

Environmental Protection

FNF is committed to protecting and conserving the environment.

FNF recognizes our duty to conduct our business in an environmentally responsible manner and implement sustainability efforts that minimize our impact on the environment.

The Company cooperates with government bodies and communities in environmental protection efforts and complies with environmental laws and regulations.

For more information on this topic, refer to the Environmental Policy Statement.



RESPONSIBILITY TO OUR SHAREHOLDERS

Accounting and Financial Reporting

Accuracy and Retention of Business Records

Conflicts of Interest

Protecting Company Assets

Protecting Confidential Information

Proprietary Rights

Use of Company Name, Facilities or Relationships

Web Presence and Social Media Use

Accounting and Financial Reporting

FNF follows generally-accepted accounting principles and standards and, as appropriate, statutory accounting requirements, as well as all applicable laws, regulations and practices for accounting and financial reporting. A system of internal accounting controls has been developed and maintained to provide reasonable assurances that:

- transactions are executed in accordance with management's general or specific authorizations;
- transactions are recorded for the preparation of financial statements in conformity with generally-accepted accounting principles or any other criteria applicable to such statements and to maintain accountability for assets;
- access to assets is permitted only in accordance with management's general or specific authorization; and
- the recorded assets are compared with the existing assets at reasonable intervals and action is taken with respect to any differences.

FNF fully and fairly discloses the financial condition and results of operations of FNF in compliance with applicable financial reporting and accounting laws, rules and regulations. Timely, accurate, and understandable disclosures to the public, whether made through press releases, filings with the Securities and Exchange Commission, or through other public methods, enhance FNF's reputation for integrity. To meet its obligations, FNF relies on employee truthfulness to ensure accuracy of its financial statements. **Any employee who is aware of material misstatements or omissions affecting the fair presentation or accuracy of FNF's financial statements is obligated to have the statements corrected or, failing that, to report this information promptly in accordance with the reporting provisions of this Code.**

Q&A

I have been requested to make an accounting entry that I do not feel is accurate or justified. What should I do?

All accounting entries must be complete and accurate. If you have been asked to make an accounting entry that you feel is not accurate or justified, promptly contact your supervisor, Audit Services Department, Corporate Compliance Department, or the Compliance and Ethics Hotline.

DO THE RIGHT THING

- Do not use FNF funds or assets for any purpose that violates FNF policy.
- Do not maintain or establish undisclosed or unrecorded funds or assets of FNF for any purpose.
- Do not make any false entries on the books or records of FNF, including expense reports or other requests for reimbursement.
- Do not make or approve payments on behalf of FNF knowing that it might be used for something other than the stated purpose.
- Immediately report any suspicious transactions or activities, or refer questions relating to these topics to the Audit Services Department, Corporate Compliance Department, or the Compliance and Ethics Hotline.

In order to promote accurate, complete and understandable financial disclosures to the public, FNF employees must make open and full disclosures to, and have honest and prompt discussions with, representatives of FNF's outside auditors.

Employees are prohibited from taking any action to fraudulently influence, coerce, manipulate or mislead any independent public accountant engaged to perform audit or non-audit services for FNF. Types of conduct that would constitute improper influence include:

- offering and paying bribes or other financial incentives, including offers of future employment or contracts for non-auditing services;
- intentionally providing an auditor with an inaccurate or misleading analysis;
- threatening to cancel or canceling existing non-audit or audit engagements if the auditor objects to FNF's accounting practices or policies;
- seeking to have a partner of the auditor removed from the audit engagement because the partner objects to FNF's accounting practices or policies; and
- blackmailing or making physical threats to an auditor.

Accuracy and Retention of Business Records

Employees are required to record and report all information in an accurate, complete and timely manner. Alteration or falsification of the books, records and other documents of FNF is strictly prohibited. In addition, the books, records and other documents of FNF must not be organized or presented in a way that intentionally conceals information or misleads or misinforms the recipient of the information.

Q&A

My spouse is opening an office supply store and would like to approach FNF to solicit its business for purchasing office supplies. Is this a conflict of interest?

It could be a conflict of interest. Your spouse may approach FNF to solicit its business as long as you have no responsibility for procuring these services and you are not involved in the selection process. You should always disclose these types of situations to your supervisor.

Refer to the Records Retention and Information Management Policy regarding the requirements for retention and disposal of business records. Business records include paper documents (originals and photocopies), voicemail, e-mail and other electronic records. The length of time that business records must be retained varies depending on the type of document and applicable legal requirements. In the event you discover or are notified of a violation or potential violation of the Records Retention and Information Management Policy, immediately notify the Corporate Compliance Department or the Compliance and Ethics Hotline.

Under no circumstance shall any records known to be the subject of or germane to any anticipated, threatened or pending law suit, governmental or regulatory investigation, or case filed under the United States Bankruptcy Code be altered, falsified, destroyed, concealed or relocated in a manner that inhibits or delays access or detection.

DO THE RIGHT THING

- Do not knowingly prepare false or misleading records or reports.
- Do not dispose of records, reports or other business records except in strict compliance with Records Retention and Information Management Policy.

Conflicts of Interest

FNF's shareholders expect business decisions to be made in the best interest of the Company. Therefore, all actions must be based on sound business judgment and not motivated by personal interest or gain. Any situation that creates or appears to create a conflict between personal interests and the interests of FNF must be avoided. Potential conflicts of interest must be reported to the Corporate Compliance Department or the Compliance and Ethics Hotline.

For additional information on conflicts of interest, refer to the Conflicts of Interest section of the Employee Handbook.

► Corporate Opportunities

Employees may not take for their personal gain or benefit any business opportunity that is discovered using Company property, information or position. Employees are prohibited from competing with FNF in any way.

► **Gifts and Entertainment**

Business gifts and entertainment, when exchanged appropriately, can build goodwill and help develop and enhance business relationships. However, they can also create conflicts of interest. It is not appropriate to provide or accept any gift, favor, business courtesy, or entertainment that may create a feeling of obligation, compromise your judgment, or appear to influence the recipient.

DO THE RIGHT THING

Accepting Gifts and Entertainment

- Do not accept or allow a close family member to accept gifts, services, loans or preferential treatment from anyone in exchange for a past, current or future business relationship with FNF.

Giving Gifts and Providing Entertainment

- Do not give a gift if others could see the gift as engaging in bribery or a consideration for an official or business favor.

If you have any question about the appropriateness of accepting or giving a gift or invitation, you should discuss the matter with your supervisor or the Corporate Compliance Department prior to accepting or giving the gift.

For more information on this topic, refer to the Gift and Entertainment Policy.

Q&A

A friend of mine, who works at another company, informed me while we were at the gym that their company is about to acquire another company. The acquisition has not been made public and, once announced, I believe it will increase the company's stock price. I would like to buy the stock now and advise my friends and family to do the same. Can I do this?

No, you cannot buy the stock or advise anyone else to buy it since you are aware of material nonpublic information. Doing so would violate insider trading laws and subject you to civil or criminal penalties.

► **Inside Information and Securities Trading**

In performing your duties at FNF, you may learn important material information about FNF or other companies that has not been made public. Using this information for personal financial gain is unethical and may violate federal securities laws. Inside information is nonpublic information that a reasonable investor would likely consider important in deciding whether to buy, sell or hold a security. Inside information about a company might include:

- the purchase or sale of a major asset;
- changes in dividend policy;
- mergers, acquisitions, and joint ventures;
- significant changes in operations or business plans;
- major developments in investigations or litigation;
- the company's financial condition or operating results, including earnings information and forecasts; and
- regulatory developments.

Employees are prohibited from trading FNF securities or the securities of other companies while they are aware of material inside information that is not publicly available. Employees are also prohibited from disclosing material inside information to other people. Substantial civil penalties and criminal sanctions may be imposed on FNF and the employee for noncompliance with securities laws. Non-employees (i.e., an employee's spouse, friend, or broker) can also be held liable for trading on inside information that an employee provided to them.

DO THE RIGHT THING

- Do not buy or sell securities based upon material nonpublic information.
- Do not give tips or suggestions to friends, family or acquaintances to buy or sell securities when you have material inside information.
- Consult the Legal Department if you are uncertain about the legal rules involving the purchase or sale of any FNF security or any securities in companies that you are familiar with by virtue of your position at FNF.

For more information on this topic, refer to the Insider Trading and Tipping Policy.

Q&A

I sometimes use email to send personal messages when I am at work. Is that okay?

Occasional personal use of email is acceptable. However, you should have no expectation of privacy if you send email using Company computers. You also must abide by all Company policies when using Company computers. You must never send harassing or inappropriate emails, chain letters, personal advertisements or solicitations.

► **Personal Investments in FNF Securities**

FNF supports employee stock ownership. Investments in FNF securities or the securities of its publicly-traded subsidiaries for personal accounts should be made with a long-term orientation and as part of a broader investment strategy. In order to comply with applicable law and avoid the appearance of impropriety, the following general restrictions apply to all transactions in FNF securities:

- Employees are prohibited from trading in FNF securities for their personal accounts if they possess material nonpublic information about FNF.
- Employees are responsible for knowing and abiding by any FNF corporate or business unit policies regarding FNF securities that may be applicable to them.
- FNF directors and its most senior officers are subject to reporting and other legal restrictions regarding their personal trading of FNF securities.
- FNF reserves the right to monitor any account for suspicious activity.

► **Related Party Business Dealings**

You must notify the Corporate Compliance Department of any business relationship or proposed business transaction FNF may have with any company in which you or a related party has a direct or indirect interest, or from which you or a related party may derive a benefit, or where a related party is employed, if such a relationship or transaction might give rise to the appearance of a conflict of interest. For example, you must notify the Corporate Compliance Department if you or a family member owns or controls property of significant value that FNF is either purchasing or leasing.

This requirement generally does not apply if the interest exists solely as a result of your ownership of less than 1 percent of the outstanding publicly-traded equity securities of such company.

Protecting Company Assets

Sound judgment must be used to safeguard the Company's assets from misuse or waste. Company assets include cash and other financial assets, buildings, equipment, computer networks and supplies. Company resources should be used only to conduct company business or for purposes authorized by management. Company computers and networks may only be used in accordance with Company policy and should never be used to access, receive or transmit material that others may find offensive. When using Company equipment, employees should not have any expectation of privacy or confidentiality.

For additional information, refer to the Information Security Policy.

Protecting Confidential Information

While working for FNF and continuing after employment or association with FNF has ceased, you must protect the confidentiality of nonpublic information obtained or created in connection with your employment at FNF. You must not disclose proprietary or confidential information about FNF or its employees, or confidential information about a customer, agent, or other individuals to anyone (including other FNF personnel) who is not authorized to receive it nor has a need to know the information.

Examples of proprietary and confidential information include:

- any system, information or process that gives FNF an opportunity to obtain an advantage over its competitors;
- nonpublic information about FNF's operations, results, strategies, projections, business plans, business processes, and client relationships;
- nonpublic employee information;
- nonpublic or personally identifiable information received in the course of your employment about customers and agents; and
- nonpublic information about FNF's technology, systems and proprietary products.

The only exceptions to FNF's nondisclosure policy of its nonpublic proprietary and confidential information are when such disclosure is authorized by:

- the customer or agent;
- applicable law (i.e., to supervisory regulators);
- appropriate legal process (i.e., subpoena); or
- appropriate FNF authorities.

DO THE RIGHT THING

- Safeguard confidential information by keeping it physically and electronically secure.
- Do not disclose confidential information to persons outside FNF, except as outlined above.
- Limit access and disclosure of confidential information only to those who need to know.
- Avoid discussing confidential information in public areas, on cellular phones, or on speaker phones.
- Exercise great care to secure client information in Company files and records.
- Obtain supervisory approval before taking files or records offsite.

For additional information, refer to the Information Security Policy and the Privacy Policy.

Proprietary Rights

Employees are required to disclose and assign to FNF all interest in any invention, improvement, discovery or work of authorship made or conceived that arises out of or in connection with employment with FNF. If your employment is terminated, all rights to property and information generated or obtained as part of your employment relationship remain the exclusive property of FNF.

Use of Company Name, Facilities or Relationships

Employees may not use FNF's name (including on corporate letterhead or personal websites), facilities or relationships for personal benefit or for outside work. Use of FNF's name, facilities or relationships for charitable or pro bono purposes can be made only with prior approval from the Legal Department, and only after any other notification and approvals in accordance with the policies of your individual department or division.

Web Presence and Social Media Use

The creation and use of Company-branded websites and social media accounts as a marketing tool to further FNF's web presence is permitted subject to the provisions of the Web Presence and Social Media Policy.

Limited and occasional use of FNF's systems to engage in personal social media activity is permitted, provided it does not otherwise violate FNF's policies, is not detrimental to FNF's best interests, and does not interfere with an employee's regular work duties. Personal social media activity from FNF's systems is subject to monitoring by the Company, and employees should have no expectation of privacy.

For more information on this topic, refer to the Web Presence and Social Media Policy.

DO THE RIGHT THING

- Do not use trademarks, logos or other intellectual property of FNF while engaging in personal social media activity.
- Do not reveal any proprietary or confidential information about the Company while engaging in social media of a personal nature.
- When engaging in personal social media activity, do not attribute personal statements, opinions or beliefs to FNF, or represent yourself as an employee or representative of FNF.



601 Riverside Avenue
Jacksonville, FL 32204

This Code does not constitute an employment contract, and nothing in this Code changes the at-will nature of employment with FNF. Adherence to this Code is a condition of employment or continued employment with FNF.

Annual Code certification is part of this requirement, and failure to do so within the required time could result in termination of employment.

COMPLIANCE AND ETHICS HOTLINE

855-FNF-TIPS (U.S.)

011-877-597-7454 (International)

TO REPORT ONLINE

<https://fnf.ethicspoint.com>

Code of Business Conduct and Ethics

February 2024