



## Human and Labor Rights Policy Statement

### **Introduction**

Fidelity National Financial, Inc. (“FNF”) proudly supports human rights. As such, FNF is committed to the principle that all of its employees should work in a respectful environment regardless of race, color, creed, religion, age, sex/gender, pregnancy, national origin or ancestry, citizenship status, veteran status, marital status, physical or mental disability, sexual orientation, gender identity or expression, (including transgender status), genetic information and/or any other characteristics protected by applicable federal, state or local laws. This Statement is overseen by the Audit committee of FNF’s board of directors, and senior and executive management.

One of our six core precepts is “Highest Standard of Conduct.” Every FNF employee is expected to maintain the highest standard of business conduct and ethics in every aspect of our business. 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 includes how we treat our employees, how our employees treat each other, and the manner in which we, collectively, engage with the community.

### **Human Rights Principles**

At FNF, we are committed to the following Human Rights principles:

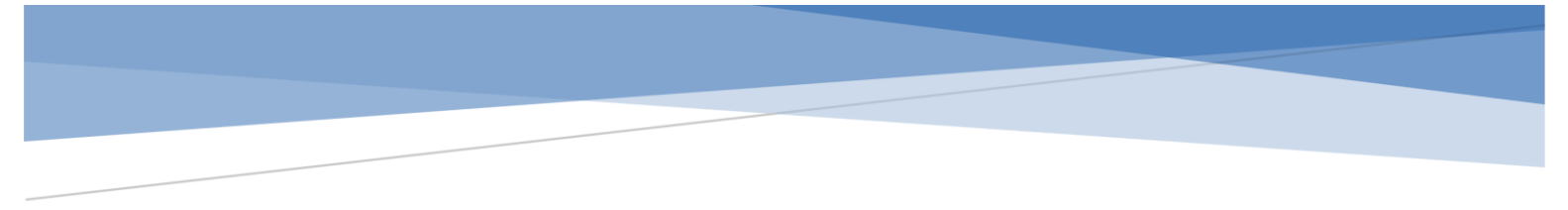
- Recognizing human rights in all parts of the world and opposing discrimination on the basis of race, color, creed, religion, age, sex/gender, pregnancy, national origin or ancestry, citizenship status, veteran status, marital status, physical or mental disability, sexual orientation, gender identity or expression (including transgender status), genetic information and/or any other characteristic protected by applicable federal, state or local laws.
- Banning the practice of recruiting children and exploiting child labor, as well as ceasing partnership with any third party involved in such practices.
- Prohibiting any form of abuse of employees such as corporal punishment, as well as prohibit the use of all forms of forced labor, including, indentured labor, bonded labor, or slave labor and the human trafficking associated with such abuses.

### **Human Rights Strategy**

FNF is committed to making a positive impact on the people and communities in which we work. FNF’s commitment to fair, ethical, and responsible business practices, as we engage with our employees, clients, third parties and communities around the world, is embodied in our internal policies and practices, such as those listed below and this statement.

### Code of Business Conduct and Ethics

FNF is committed to maintaining the highest legal and ethical standards in every aspect of our business. Our Code of Business Conduct and Ethics is intended to provide information, support, and resources to ensure 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 its reputation for honesty and strong ethical standards.

The FNF Chief Compliance Officer is responsible for the administration of the Code of Business Conduct and Ethics under the direction of the Audit Committee of the FNF Board of Directors.

#### Forced and Child Labor

FNF's operations do not permit the use of forced labor, including slavery, human trafficking and child labor. We are committed to cease involvement with any party that allows such practice. Employment must be freely chosen by workers, without threat or penalty of any sort.

#### Fair Compensation and Pay Transparency

FNF fairly compensates its employees, in compliance with relevant legislation and legally mandated work hours and overtime compensation. FNF maintains a robust employee benefits program designed to protect eligible employees from financial hardship due to unexpected illness or injury and enable employees to provide for the health and financial security of their families. FNF also provides paid leave for a variety of reasons such as vacation, illness, parental leave including adoption and foster care placement, and for civic obligations including voting and volunteerism.

FNF will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. FNF's Pay Transparency Policy Statement, along with more detailed benefits information, is contained within its Employee Handbook.

#### Americans with Disabilities Act

FNF is committed to complying with Titles I and III of the Americans with Disabilities Act ("ADA"). As part of this commitment, FNF (i) provides to qualified individuals with disabilities the equal opportunity to benefit from the full range of employment-related opportunities available to others; and (ii) accommodates physical or mental limitations of qualified individuals of which FNF is aware unless such accommodation results in an undue hardship to FNF. Our commitment to ADA compliance is documented in FNF's Americans with Disabilities Act Compliance Policy.

#### Diversity & Inclusion

FNF is committed to ensuring all employees feel welcome, respected, and included. Our organization is committed to providing equal opportunity for all employees at all levels regardless of race, color, creed, religion, age, sex/gender, pregnancy, national origin or ancestry, citizenship status, veteran status, marital status, physical or mental disability, sexual orientation, gender identity or expression (including transgender status), genetic information and/or any other characteristic protected by applicable federal, state or local laws. This includes but is not limited to recruitment, hiring, promotion, transfer, compensation, training, demotion, or layoff. More information can be found in our [Diversity & Inclusion Policy Statement](#).

#### Enterprise Risk Management & Vendor Risk Assessment

FNF maintains a comprehensive enterprise risk management program (ERM) that provides the framework to align our risk appetite and strategy to enhance management of enterprise risks, including ESG and information security risks, and risk-response decisions. Through our ERM program, we analyze material risks inherent to our products, services, and businesses. We develop appropriate plans to mitigate out of tolerance risks to an acceptable level. FNF tailors the level of assessment based on the vendor's level of risk and the nature of the services it provides.

## Reporting, Accountability & Enforcement

FNF maintains an open-door culture which encourages both employee feedback and reporting potential policy violations. Employees who have experienced, witnessed, or suspect conduct violations, such as discrimination or harassment, are provided with several channels through which to report. Employees are encouraged to use the channel with which they are most comfortable, may remain anonymous, and are reminded that the Company prohibits retaliation against any employee who reports a concern in good faith.

The possible channels for reporting allegations of non-compliance with our policies include:

- The employee's supervisor or manager;
- The employee's local Human Resources Representative;
- Corporate Human Resources;
- FNF's Compliance Department; or
- FNF's 24 Hour Compliance and Ethics Hotline.

FNF's 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. Individuals may call the hotline to report suspected misconduct, raise concerns about compliance and ethics matters, or ask questions. Trained interviewers will protect confidentiality and anonymity, if desired.

- **For Calls Within the U.S.:** 855-FNF-TIPS
- **For International Calls:** 011-877-597-7454
- **To Report Online:** <https://fnf.ethicspoint.com>

## Remediation

FNF maintains formal Incident Escalation Guidelines which provide a framework for proper internal assessment, investigation, and escalation of allegations of illegal or unethical conduct, including alleged violations of FNF's policies. All incidents are treated as sensitive. 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.

## Training

FNF's annual compliance training serves as a reminder to employees of its core compliance policies and our zero-tolerance approach to discrimination and harassment.

All FNF employees must acknowledge the following FNF Corporate policies and documents annually:

- Employee Handbook, containing among other items, its Equal Employment Opportunity Statement, Workplace Violence Prevention Policy, and information on its ADA Compliance Policy;
- Code of Business Conduct and Ethics; and
- Harassment, Discrimination, and Bullying Policy.

In addition to other required training, Employees must complete the following FNF Corporate training modules annually:

- Code of Business Conduct and Ethics;
- Reporting Harassment: Everyone's Responsibility; and
- ADA Compliance Policy.