

## **Diversity and Inclusion Policy Statement**

Fidelity National Financial, Inc. ("FNF" or the "Company") recognizes that promoting an inclusive work environment is key to attracting and retaining its employees. FNF views the diversity of viewpoint, background, and experience of its employee-base as a contributing factor to its overall success. The policies and processes below apply to all FNF employees and majority-owned subsidiaries.

# Managerial Commitment to Non-Discrimination in Hiring and Advancement Practices

FNF demonstrates its commitment to diversity at the highest levels of management. Championing diversity ensures that we have a variety of employee ideas, perspectives, values, and experiences, all of which are key components to our success and expected by our clients, customers, and other stakeholders. The diversity of our employee base allows us to connect to our clients and customers in important ways and offer meaningful solutions that resonate with their unique needs. When making decisions regarding hiring and advancement opportunities, FNF requires its management team hire the best talent and strive to grow our diversity. It is the responsibility of all employees to promote and uphold this tradition.

### **Board-Level Commitment to Diversity and Inclusion**

The FNF Board of Directors' Corporate Governance and Nominating Committee is responsible for identifying and nominating future FNF Board members. The Committee's Charter requires it to "consider the characteristics of directors and director nominees with the goal of maintaining a mix of skills, background, gender diversity, ethnic diversity, and tenure on the board to support and promote the Company's strategic vision." FNF publishes its Corporate Governance and Nominating Committee Charter publicly at www.fnf.com.

# **FNF Policies Supporting Diversity and Inclusion**

# **Equal Employment Opportunity Policy Statement**

FNF is committed to equal employment opportunity and to compliance with all federal, state, and local laws. We prohibit employment 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. Our policy includes certain non-immutable traits historically associated with race, such as hair texture and certain hairstyles.

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 personnel actions and conditions of employment, including recruitment, hiring, compensation, benefits, discipline, transfers, promotions, lay-offs, leaves of absence, terminations, participation in Company-administered or Company-sponsored activities, and access to facilities and programs.

Diversity and Inclusion Policy Statement Original Effective Date: May 09, 2022 Current Version Date: May 09, 2022 FNF maintains relevant non-proprietary portions of its Equal Opportunity Policy Statement on its website at <a href="https://www.fnf.com">www.fnf.com</a>. Also on its website, FNF makes available to the public its searchable database of job openings and provides qualified disabled individuals with a means to request an accommodation as part of the application process.

Employees may access FNF's Equal Employment Opportunity Policy Statement on the FNF Intranet or within the Employee Handbook.

# Harassment, Discrimination, and Bullying Policy

FNF is committed to providing a work environment that is free of intentional and unintentional discrimination and harassment, including sexual harassment. FNF's Harassment, Discrimination, and Anti-Bullying Policy strictly prohibits verbal or physical conduct based on hostility or aversion toward an individual because of his/her race, color, creed, religion, age, sex/gender, 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 or any other characteristic protected by applicable federal, state or local law, or that of his/her relatives, friends or associates, and that has the purpose of effect of creating an intimidating, hostile or offensive work environment, unreasonably interferes with an individual's work performance, or otherwise adversely affect an individual's employment opportunities.

Harassing or bully behaviors such as epithets, slurs, insulting jokes, the dissemination of demeaning material, or unwanted physical contact or sexual-oriented comments may result in disciplinary action up to and including termination. This Policy applies to all Company employees, agents, vendors, and nonemployees, including management and non-supervisory employees.

FNF's Harassment, Discrimination, and Anti-Bullying Policy is available to all employees on the Company's Intranet site.

### **Americans with Disabilities Act Compliance Policy**

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 ADA Compliance Policy, which is made available to all employees on our intranet site and in our Employee Handbook.

#### **Workplace Violence Prevention Policy**

FNF is committed to providing a workplace free of threats or acts of violence and in protecting its employees from such conduct on its premises. The Company prohibits any violent, threatening, or intimidating behavior by any employees, agents, vendors, and non-employees while on Company property or while they are engaged in business with or on behalf of the Company.

FNF's Workplace Violence Prevention Policy is contained within its Employee Handbook.

## **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 outlines the core precepts that represent the cornerstone of our management philosophy. The most important of our 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 way we, collectively, engage with the community.

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FNF's 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. FNF publishes its Code of Business Conduct and Ethics publicly at www.fnf.com.

## Strategy Initiatives Supporting a Diverse and Inclusive Environment

FNF offers of a variety of mechanisms to enhance human capital and formalize its commitment to diversity and inclusion. The Company encourages the professional growth and satisfaction of each employee. The practice of promotion from within is endorsed as a way of encouraging employees to maximize their professional potential. The Company strives to grow its diversity while promoting the most capable and experienced individuals based on demonstrated ability to assume greater responsibility.

Our track record of employee satisfaction is reflected in the tenure of our employee-base. FNF publishes key employee data, such as longevity with the Company, age group and gender representation, and year-over-year retention and turnover, in its annual Sustainability Report. FNF's Sustainability Report is available publicly at www.fnf.com.

#### **Employee Growth and Development**

To cultivate opportunities for growth and development, FNF offers educational reimbursement, employee memberships to various professional and civic organizations, and provides onsite role-specific training and continuing education programs. FNF also encourages professional development and promotion from within through its Women in Leadership and Leadership Development programs. Both programs offer opportunities for employees of all backgrounds and experience levels to gain access to mentorship and engagement with senior management.

### **Compliance Training and Corporate Policy Acknowledgment**

FNF incorporates diversity, anti-discrimination, and anti-harassment initiatives throughout its corporate policy framework. Our annual compliance training serves as a reminder to employees of our zero-tolerance approach to discrimination and harassment.

In addition to other required policy acknowledgments, 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 additional 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.

# **Complaint Reporting and Investigation**

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 related to non-discrimination and harassment include:

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- 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 with U.S. and International numbers and website reporting access (maintained by an independent, third-party vendor that allows for anonymous reporting).

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 anti-discrimination or harassment law. All incidents are treated as sensitive.

# **Governance**

The Audit Committee maintains oversight of the Company's compliance with legal and regulatory requirements and enterprise risk including environmental, social, and governance (ESG) risk. FNF's Chief Compliance Officer and Chief Risk Officer routinely report to the Audit Committee on risk and compliance issues, including issues arising out of non-compliance with this Policy Statement.