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# CODE OF BUSINESS CONDUCT & ETHICS

## Code of Business Conduct & Ethics

A Message from

Christopher Blunt, Chief Executive Officer

Dear Fellow F&G Annuities & Life Inc. Colleagues:

This Code of Business Conduct and Ethics (“Code”) is a resource for applying our values and ensuring a consistent understanding of what F&G 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 F&G Annuities & Life Inc. colleague.

Thank you for doing your part to ensure our ongoing success and our adherence to the highest standards of conduct.

Sincerely,

Christopher Blunt  
Chief Executive Officer

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## UNDERSTANDING OUR CODE:

### Introduction

F&G Annuities & Life Inc. (F&G) 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 F&G 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 F&G Annuities & Life, Inc., its majority owned subsidiaries and controlled affiliates where F&G maintains active control within the entity (collectively referred to as “F&G” or the “Company”). If a majority-owned subsidiary or controlled affiliate has its own code, then that document shall apply. For purposes of this Code, a “controlled affiliate” means any business in which F&G 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 F&G. 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 and outside the scope of contractual relationship. Anyone who engages in misconduct, violates this Code or otherwise fails to meet F&G standards may be disciplined up to and including termination of employment or other relationship with F&G and may be subject to civil and/or criminal charges.

### Doing Business with Prohibited Persons

F&G 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. Generally, 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.

## Administration

The F&G Chief Compliance Officer is responsible for the administration of this Code under the direction of the Audit Committee of the F&G 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. If there are questions regarding any interpretations of provisions of the Employee Handbook and this Code conflicting, please contact Compliance at [Compliance@FGLife.com](mailto:Compliance@FGLife.com) or [Ask\\_HR@fglife.com](mailto:Ask_HR@fglife.com).

## 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.

Where provisions of this Code conflict with provisions of Fidelity National Financial's Code, the provisions of this Code control.

## Amendment or Modification of the Code

This Code may be amended or modified at any time by the F&G Chief Compliance Officer with substantial modifications being approved by the F&G Enterprise Risk Management Committee. The current version of this Code is available on the Company's SharePoint page under Policies.

## Waivers

Waivers of certain limited sections of this Code may be granted to directors or executive officers only by the F&G Board of Directors or by its Audit Committee. Such waivers will be disclosed as required by applicable rules and regulations of the Securities and Exchange Commission and the New York Stock Exchange.

## DUTY TO REPORT VIOLATIONS

### 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 F&G.

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

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following:

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

You may contact the Compliance and Ethics Hotline at 855-FNF-TIPS (U.S.) 001-877-597-7454 (International) <https://fnfethicspoint.com>.

F&G 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.

## Investigations

F&G's Compliance Department, Legal Department, Human Resources Compliance 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, F&G's counsel, F&G's representatives, or regulators is grounds for immediate termination of employment or other relationship with F&G, 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, F&G is committed to taking prompt action to correct the situation and, when appropriate, discipline responsible individuals.

## Non-Retaliation Policy

F&G 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 F&G or to a government official or agency.

## INDIVIDUAL RESPONSIBILITY

F&G is made up of people 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 applicable laws, rules and regulations, this Code, Company policies and guiding principles.
- Seeking guidance if you have any questions about specific compliance concerns or proper

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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 also responsible for:

- Ensuring employees who report to you understand and comply with all laws, rules and regulations, this Code, Company policies and guiding principles.
- 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.

For additional information on topics covered in this section, please refer to the Employee Handbook and the Company's Inclusion Guiding Principles.

## RESPONSIBILITY TO EACH OTHER

### 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

F&G 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

F&G values a work environment where diversity is embraced and where employees' differences are valued and respected. F&G provides a work environment that is free from intimidation, hostility and other behaviors that might interfere with work performance. F&G 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,

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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.

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

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.

### **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. F&G's systems should never be used to transmit emails or other communications 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.

## **DO THE RIGHT THING**

- Never take part in conduct that is hostile or threatening nor encourage others to do so.
- Never use F&G's 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.

## **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.

## **Safety**

F&G 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 Employee Handbook.

## **Employees' Confidential Information**

F&G respects and protects employees' confidential information.

Consistent with applicable laws, F&G 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**

Employees are expected to be vigilant in discovering evidence of possible fraud that might affect F&G. Fraud is any material misrepresentation or deliberate act of an employee, customer, agent or contract service provider with the purpose of deceiving or cheating F&G, 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 include:

- Forgery or alteration of checks, securities, invoices, policies, or accounting records;
- Misappropriation of F&G funds, securities, supplies, furniture, equipment or other assets;
- Any misuse of F&G corporate credit cards.

### **Improper Payments**

The use of F&G 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**

Federal and state laws and regulations provide specific guidelines regarding the privacy, protection and security of 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.

### DO THE RIGHT THING

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

## 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.

## Antitrust and Fair Competition

F&G 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 both F&G and the responsible employee(s). F&G 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.

## Trade Associations

Membership and attendance at trade association functions are recognized methods of furthering legitimate business interests of F&G. 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 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. Sensitive areas include coverages, 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 other sensitive subjects are discussed. It is F&G's position that a trade association should not be used to police what are perceived to be illegal or unethical practices within the industry.

## 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.
- F&G 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 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 Compliance Department.

## RESPONSIBILITY TO OUR COMMUNITIES

### Investor Relations

As a publicly-traded company, F&G 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://investors.fglife.com/corporate-profile/default.aspx>.

### 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 Marketing Department at [media@fglife.com](mailto:media@fglife.com).

## Government Requests

F&G cooperates fully with requests made by government agencies and authorities, including taxing authorities and regulators, through authorized employees only. All requests from government agencies and authorities for information should be immediately referred to the Compliance Department at [Compliance@fglife.com](mailto:Compliance@fglife.com).

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 F&G and the employee to criminal penalties.

## Q&A

### **I received a request for information from a state Attorney General. How should I respond?**

All requests from government agencies and authorities should be immediately forwarded to the Compliance Department at [Compliance@fglife.com](mailto:Compliance@fglife.com).

## Community and Professional Involvement

F&G 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 F&G 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 F&G. Your immediate supervisor must approve any such direction, and a copy of the completed Request for Outside Employment Form must be sent to [TotalRewards@fglife.com](mailto:TotalRewards@fglife.com) and [Compliance@fglife.com](mailto:Compliance@fglife.com) as directed in the [Outside Employment Policy](#).

## Individual Political Activity

F&G 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 F&G representative.

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

## DO THE RIGHT THING

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- Do not use your job title or other employee identity to suggest that F&G supports a particular candidate, political position or political party.
- Never use F&G'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 F&G must be approved in advance by the Compliance Department. This prohibition includes monetary contributions, "in-kind" contributions (e.g., 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.

Under no circumstance shall political contributions be made on behalf of F&G 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 F&G.

### DO THE RIGHT THING

Unless specifically authorized by F&G:

- Do not make contributions on behalf of F&G 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 F&G'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

F&G regularly contributes to bona fide charities that promote the well-being 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 F&G 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 F&G. Some F&G employees are specifically authorized to lobby or otherwise communicate with elected officials or government employees on behalf of F&G. Due to the complexity of laws dealing with lobbying, all planned

contacts with such individuals are subject to prior written approval from the Compliance Department.

## 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 F&G in support of her candidacy?**

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

## DO THE RIGHT THING

- Do not engage in lobbying activities on behalf of F&G 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 Compliance Department. Statutory requirements may render such appointment or election to public office improper unless assurances are given that business relations between F&G and the government agency in which you would serve would not be prohibited. However, if an employee is going to be compensated for their work efforts, the F&G Request for Outside Employment Form may need to be completed and your supervisor may need to approve the activity. For any questions, contact [Compliance@FGLife.com](mailto:Compliance@FGLife.com) or [TotalRewards@fglife.com](mailto:TotalRewards@fglife.com).

## Environmental Protection

F&G is committed to protecting and conserving the environment.

F&G recognizes the importance of conducting business in an environmentally responsible manner and integrating environmental management best practices into our operations.

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

## RESPONSIBILITY TO OUR SHAREHOLDERS

### Accounting and Financial Reporting

F&G 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:

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- 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.

F&G fully and fairly discloses the financial condition and results of operations of F&G 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 F&G's reputation for integrity. To meet its obligations, F&G 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 F&G'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 F&G funds or assets for any purpose that violates F&G policy.
- Do not maintain or establish undisclosed or unrecorded funds or assets of F&G for any purpose.
- Do not make any false entries on the books or records of F&G, including expense reports or other requests for reimbursement.
- Do not make or approve payments on behalf of F&G 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, Compliance Department, or the Compliance and Ethics Hotline.

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

Employees are prohibited from taking any action to fraudulently influence, coerce, manipulate or

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mislead any independent public accountant engaged to perform audit or non-audit services for F&G. 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 F&G's accounting practices or policies;
- seeking to have a partner of the auditor removed from the audit engagement because the partner objects to F&G'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 F&G is strictly prohibited. In addition, the books, records and other documents of F&G must not be organized or presented in a way that intentionally conceals information or misleads or misinforms the recipient of the information.

Refer to the Records Retention and Disposition Policy regarding the requirements for retention and disposal of business records. Business records include paper documents (originals and photocopies), voicemail, email 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 Disposition Policy, immediately notify the 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 the Records Retention and Disposition Policy.

## Conflicts of Interest

F&G'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 F&G must be avoided. Potential conflicts of interest must be reported to the Compliance Department or the Compliance and Ethics Hotline.

## 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 F&G in any way. If an employee or contractor is seeking to conduct an activity for compensation outside their employment with F&G, they must follow the process as described in the Outside Employment Policy and Employee Handbook.

## 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.

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

## Inside Information and Securities Trading

In performing your duties at F&G, you may learn important material information about F&G 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, or material, information is nonpublic information that a reasonable investor would likely consider important in deciding whether to buy, sell or hold a security. Material 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;
- significant cybersecurity incidents; and
- regulatory developments.

Employees are prohibited from trading F&G securities or the securities of other companies while they are aware of material information that is not publicly available. Employees are also prohibited from disclosing inside and other confidential or commercially sensitive information to other people. Substantial civil penalties and criminal sanctions may be imposed on F&G and the employee for noncompliance with securities laws. Non-employees (e.g., 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 while in possession of material nonpublic information.
- Do not give tips or suggestions to friends, family or acquaintances to buy or sell securities when you have material nonpublic information.
- Consult the Legal Department if you are uncertain about the legal rules involving the purchase or sale of any F&G security or any securities in companies that you are familiar with by virtue

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of your position at F&G.

For more information on this topic, refer to the Insider Trading Policy. Members of F&G's Board of Directors and officers subject to Section 16 of the Exchange Act are also subject to additional restrictions and procedures set forth in the Hedging and Pledging Policy.

## Personal Investments in F&G Securities

F&G supports employee stock ownership. Investments in F&G 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. For more information on this topic, refer to the Insider Trading Policy.

## Related Party Business Dealings

You must notify the Compliance Department of any business relationship or proposed business transaction F&G may have with any company in which you or a related party (as defined in Item 404 of Regulation S-K) 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 Compliance Department if you or a family member owns or controls property of significant value that F&G 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 one 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 F&G and continuing after employment or association with F&G has ceased, you must protect the confidentiality of nonpublic information obtained or created in connection with your employment at F&G. You must not disclose proprietary or confidential information about F&G or its employees, or confidential information about a customer, agent, or other individuals to anyone (including other F&G personnel) who is not authorized to receive it nor has a need to know the information.

Examples of proprietary and confidential information include:

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- any system, information or process that gives F&G an opportunity to obtain an advantage over its competitors;
- nonpublic information about F&G'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
- nonpublic information about F&G's technology, systems and proprietary products.

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

- the customer;
- applicable law (e.g., to supervisory regulators);
- appropriate legal process (e.g., subpoena); or
- appropriate F&G authorities.

### **DO THE RIGHT THING**

- Safeguard confidential information by keeping it physically and electronically secure.
- Do not disclose confidential information to persons outside F&G, 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 F&G all interest in any invention, improvement, discovery or work of authorship made or conceived that arises out of or in connection with employment with F&G. 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 F&G. For more information refer to the Employee Handbook.

## **Use of Company Name, Facilities or Relationships**

Employees may not use F&G's name (including on corporate letterhead or personal websites), facilities or relationships for personal benefit or for outside work. Use of F&G'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 F&G’s web presence is permitted subject to the provisions of the Social Media Policy and Social Media Guide.

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

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

### DO THE RIGHT THING

- Do not use trademarks, logos or other intellectual property of F&G while engaging in personal social media activity.
- Do not reveal any proprietary or confidential information about F&G 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 F&G, or represent yourself as an employee or representative of F&G.

### 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.

## Related Policies and Procedures

Related policies and procedures include:

- Clean Desk Policy
- Information Security Policy
- Privacy Policy
- Gift and Entertainment Policy
- Employee Handbook
- Anti-Corruption Policy
- Records Retention & Disposition Policy
- Inclusion Guiding Principles

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

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.) 001-877-597-7454 (International)

TO REPORT ONLINE

<https://fnf.ethicspoint.com>

### Code of Business Conduct and Ethics

## Approvers

The following individuals or governing body is responsible for review and approval of this policy, and should determine if appropriate oversight is in place to ensure violations of compliance are identified.

Approver Name	Approver Title	Date Approved
Kenneth Cherrier	Chief Compliance Officer	12/01/2022
Kenneth Cherrier	Chief Compliance Officer	02/20/2024
Kenneth Cherrier	Chief Compliance Officer	06/18/2025

## Revision History

All policies should be reviewed annually.

Date of Revision	Revision Author	Brief Revision Description
02/20/24	Kenneth Cherrier	<ol style="list-style-type: none"><li>1) Edited scope of policy to those majority owned subsidiaries and controlled affiliates where F&amp;G maintains active control within the entity.</li><li>2) Clarified scope of policy to employees' scope of contractual relationship with F&amp;G;</li><li>3) Added reference to F&amp;G Outside Employment policy maintained within the F&amp;G Employee Handbook, which now requires F&amp;G employees to</li></ol>

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		<p>obtain manager approval before engaging in additional employeemnt outside of F&amp;G; and</p> <p>4) Added the Approver, Date of Revision and Statement of Confidentiality to the policy.</p>
04/15/2025	Kenneth Cherrier	Added to section Gifts and Entertainment the prohibiting of acceptance of a gift or business entertainment from a vendor the employee is vetting during contract negotiation.
06/09/2025	Kenneth Cherrier	<p>Aligned policy with other policies, removed duplicity with other policies and added Related Policies and Procedures section.</p> <p>(1) Granting CCO Code edit rights</p> <p>(2) Limiting waivers to the Code</p> <p>(3) Updating Ethics Hotline address</p> <p>(4) Added reference to F&amp;G Oitside Employment Form</p> <p>(5) Removed Q&amp;F from Gift and Entertainment section referring back to that specific policy</p> <p>(6) Simlified Inside Information and Securities Trading section and Personal Investments in F&amp;G Securities section, referring back to the specific Insider Trading policy</p> <p>(7) Updated Related Policies and Procedures section</p> <p>(8) Removed Statement of Confidentiality section and removed confidential watermarks</p>