



## LENDERS COMPLIANCE CHECKLIST

Chicago Title, and all of the companies in the Fidelity National Financial (FNF) family, recognizes that compliance is important to our clients and customers. Our efforts in this area meet or exceed industry standards and provide significant assurance concerning a lender's compliance responsibilities for the selection and monitoring of third-party providers required by regulations of the Office of the Comptroller of the Currency (OCC), the Consumer Financial Protection Bureau (CFPB) and other state and federal regulatory agencies.

### FINANCIAL STRENGTH ✓

**Audited Financial Statements.** The current Annual Report to Shareholders for FNF includes consolidated and audited financial statements issued by its independent auditors, KPMG, and is available at [www.fnf.com](http://www.fnf.com) under the Investors link. The most recent 10-K filing with the Securities and Exchange Commission (SEC) is available at the same web address.

**Material Litigation.** Material litigation affecting FNF and its subsidiaries is disclosed in the most current 10-K Filing and the current 10-Q and 8-K forms, filed with the Securities and Exchange Commission (SEC) all of which are available at [www.fnf.com](http://www.fnf.com) under the Investors link.

**Errors and Omissions/Liability Insurance.** FNF maintains Errors & Omissions insurance coverage for all locations and operations anywhere in the world in the amount of \$10 million per claim.

### COMPLIANCE WITH LAWS ✓

**Code of Business Conduct & Ethics.** FNF has written and implemented a Code of Business Conduct and Ethics policy, which requires its employees to act with honesty and strong ethical standards. The code contains the proper steps each employee must take should they detect fraud, including contacting our Fraud/Ethics Hotline to report their detection. The code also contains the rules for protecting our customer's personal financial information and addresses each employee's responsibility for compliance with state and federal regulations. The policy is available at [www.fnf.com](http://www.fnf.com) under Investor Relations.

**Licenses.** FNF's title insurance underwriters are licensed in 49 states and the District of Columbia. A copy of the current annual Statutory Report – Form 9 filed with the departments of insurance for each underwriter is available at [www.fnf.com](http://www.fnf.com) under the Investors link. In addition and where required, all of FNF's policy-issuing agents and underwritten title companies are licensed or authorized by applicable regulatory bodies.

**OFAC Compliance.** FNF has established internal procedures for title and escrow operations to comply with the mandates of the Executive Presidential order 13224 as implemented by the Office of Foreign Asset Control (OFAC), including not doing business with any person or entity listed on the Specially Designated and Block Persons list maintained by OFAC.

**Compliance Training.** Effective training is an integral part of FNF's compliance and ethics program and plays a vital role in maintaining our most important corporate precept: the Highest Standard of Conduct. Each FNF employee must complete compliance training annually. Training topics include privacy, record retention, web presence/social media and other policies and procedures. In addition, our escrow/closing staff participates in continuous training on new state and federal legislation and regulations through in person and webinar training, and a constantly-updated library of web-based training modules.

### PROTECTION OF CUSTOMER INFORMATION ✓

**Information Security.** FNF is committed to maintaining the integrity and security of customer non-public information, and securing that information from unauthorized use. FNF embodies this policy in specifically-required written security procedures.

**Clean Desk Policy.** FNF company offices have adopted a written "clean desk" policy to ensure customer and other proprietary information is treated with the highest degree of security and confidentiality. The policy exists to convey our commitment to our protection of customer information, a positive image to our customers who visit our offices and to minimize disorganization.

**Business Continuity.** FNF companies maintain written procedures to ensure the continuation of business in the event of a disruption with the objective of ensuring uninterrupted availability of all key business resources required to support essential business activities. The approach involves identifying preventative treatments for continuity risks that can be routinely managed, and developing an organization wide business continuity plan to deal with the consequences should the preventative treatments fail.