



# CLEAN DESK POLICY

Issuing Department:  
*Corporate Compliance*

PROPRIETARY AND CONFIDENTIAL  
FOR INTERNAL USE ONLY  
DO NOT DISTRIBUTE OUTSIDE THE COMPANY



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# 1. Policy Statement

This Policy is designed to:

- Treat customer and other proprietary information with the highest degree of security and confidentiality.
- Convey a positive image for customers who visit the Company's offices.
- Minimize disorganization, reducing time searching for misplaced items.
- Reduce the possibility of workplace accidents.

# 2. Scope

This Policy applies to all employees and contractors of Fidelity National Financial, Inc., its majority-owned subsidiaries and controlled affiliates (collectively referred to as "FNF" or the "Company").

# 3. Definitions

Key terms used in this Policy are defined as follows:

**"Work Area"** – An employee's Work Area includes the employee's individual workspace, office, or cubicle, along with any common or shared workspace utilized by an employee in the course of his or her work day.

# 4. Responsibilities

Company management is responsible for implementation and enforcement of this Policy. Periodic sweeps of Work Areas may be conducted and documented by management to verify compliance with this Policy.

Each employee and contractor is responsible for:

- Maintaining a neat Work Area.
- Storing non-essential items when not in use.
- Refraining from taking Company and customer documents and files off Company premises except when required for the efficient discharge of their job responsibilities, appropriate authorization is obtained, and appropriate protective measures are taken in compliance with the Privacy Policy and Information Security Policy. This includes documents and files in paper or electronic form, including on portable electronic or storage devices such as laptops, mobile devices, flash drives, disks, and memory sticks.
- Refraining from cluttering the Work Area with handwritten or other notes displaying sensitive information such as user IDs, passwords, account numbers, etc.
- Securing documents and electronic media, including portable electronic or storage devices, containing customer or proprietary information during extended absence from the Work Area (i.e., lunchtime, break, meeting, etc.).

- Storing all documents and electronic media at the end of the work day. All papers containing customer and proprietary information, portable electronic devices and portable storage devices must be secured in locked drawers or cabinets in a secure area. Employees who keep sensitive documents in a cabinet or storage closet in a common or shared workspace are personally responsible for confirming that the cabinet or storage area is locked at the end of the work day.
- Ensuring all files and documents, both paper and electronic, are retired timely, properly and securely, consistent with Company policies.

## 5. Consequences of Violations

Violations of this Policy may result in disciplinary action up to and including termination of employment or other relationship with the Company.

## 6. Duty to Report Violations

If you suspect or know of a violation of this Policy, immediately contact your manager or the Corporate Compliance Department at [corporatecompliance@fnf.com](mailto:corporatecompliance@fnf.com).

Alternatively, you may contact the Compliance and Ethics Hotline at 855-FNF-TIPS (within the U.S.), 011-877-597-7454 (international), or online at <https://fnf.ethicspoint.com>. The Compliance and Ethics Hotline is operated by an independent, third-party vendor and is available 24 hours a day, 7 days a week. 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.

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.

## 7. Contact

For more information on this Policy, contact the Corporate Compliance Department at [corporatecompliance@fnf.com](mailto:corporatecompliance@fnf.com).

## 8. Related Policies and Procedures

Related policies and procedures include:

- Code of Business Conduct and Ethics
- Information Security Policy
- Privacy Policy
- Records Retention and Information Management Policy

## 9. Approvers

Approver Name	Approver Title	Date Approved
Chauncy Peters	Corporate Compliance Manager	10/31/2023
Elizabeth Reilly	SVP, Chief Privacy Officer	11/01/2023
Paul Perez	Chief Compliance Officer	11/06/2023
Enterprise Risk Steering Committee	N/A – Per the Policy, Procedure, and Program Plan Management and Standards, ERSC approval is not required for non-material changes.	

## 10. Revision History

Date of Revision	Revision Author	Brief Revision Description
March 2013	Katie Schmidt	Initial policy publication.
November 2015	Katie Schmidt and Mary Richard	Revised and reformatted using new policy template and standards.
December 2016	Elizabeth Reilly	Revised to clarify “Work Area” definition and employee responsibilities.
December 2017	Elizabeth Reilly and Mary Richard	Changed Scope of Policy; and other minor changes.
December 2018	Elizabeth Reilly and Mary Richard	Annual review; no material changes.
November 2019	Elizabeth Reilly and Chauncy Peters	Annual review; no material changes.
December 2020	Elizabeth Reilly and Chauncy Peters	Annual review; no material changes.
December 2021	Elizabeth Reilly and Chauncy Peters	Annual review; no material changes.
November 2022	Chauncy Peters	Annual review; no changes.
October 2023	Elizabeth Reilly and Chauncy Peters	Annual review; no material changes.

## 11. Statement of Confidentiality

The information contained in or supplied with this document, in its entirety, is the confidential and proprietary information of FNF, and it may not be copied by or disclosed to any person or entity (other than to the intended recipients), without the prior written consent of FNF.