

BLACK KNIGHT CODE OF BUSINESS CONDUCT AND ETHICS

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A Message from Joe Nackashi, Chief Executive Officer

Dear Colleagues:

Our employees are our most valuable asset and we each play a key role in the company's future success as we continue to build upon our hard-earned reputation as the premier software, data and analytics brand in the mortgage industry.

Growing our company responsibly requires that we always comply with legal and ethical obligations in order to foster the culture of integrity, ethical conduct and responsibility that is foundational to our company. In this regard, it is important to review our Code of Business Conduct and Ethics ("Code") in order to understand your role and responsibilities as a Black Knight employee.

This Code is a valuable resource for guiding our conduct so that we act responsibly, ethically and lawfully in all instances. With our personal commitment to following to this Code, we will be able to meet the high expectations that our customers, business partners, fellow employees and shareholders expect of us.

This Code is intended to help resolve compliance and ethics issues by providing us with the information, tools and resources that are necessary for making good, ethical decisions, but no code can provide answers for every situation that may arise. We ultimately rely on you to use sound judgment to make the right decision or to escalate issues to your supervisor, Corporate Compliance or the Compliance and Ethics Hotline when you have questions.

Thank you for doing your part to safeguard our ongoing success and responsible growth by demonstrating the highest standards of ethical conduct.

Sincerely,

Joe Nackashi Chief Executive Officer



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BLACK KNIGHT



Understanding Our Code

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Compliance and Ethics Hotline

833.B.Knight (833.256.4448) (U.S.) or 000-117 then, when prompted: 833.B.Knight (833.256.4448) (India) http://www.blackknight.ethicspoint.com



Understanding OurCode

Introduction

Black Knight 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, resources, and operating guidelines 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 Black Knight to continue to preserve its reputation for honesty and strong ethical standards and to remain the premier provider of software, data and analytics solutions.

Scope

This Code applies to every employee, officer and director of Black Knight, Inc. and its subsidiaries and controlled affiliates (collectively referred to as "Black Knight" or the "Company"). For purposes of this Code, a "controlled affiliate" means any business in which Black Knight 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, officers, and directors.

Compliance with the Code

Compliance with the terms of this Code is a condition of employment. Employee conduct that violates the Code is unacceptable and will be considered in all cases to be outside the scope of the employee's employment. Any employee who engages in misconduct, violates this Code, or otherwise fails to meet Black Knight standards may be disciplined up to and including termination of employment and may be subject to civil and criminal charges. Nothing in this Code is intended to restrict or interfere with your rights under applicable labor and employment laws including but not limited to the National Labor Relations Act.

Administration

The Company's Board of Directors and executive leadership team are responsible for oversight and enforcement of this Code. Black Knight's Chief Compliance Officer is responsible for the administration of this Code under the direction of the Risk Committee of the Black Knight Board of Directors. All employees and contractors are annually trained on the Code.

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 shall control.

Supplemental Policies

This Code may be supplemented with other corporate 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.

Amendment or Modification of the Code

This Code may be amended or modified at any time by the Black Knight Board of Directors, and is regularly reviewed as required by the Black Knight *Policy and Standard Management Policy*

Waivers

Waivers of this Code may be granted to directors or executive officers only by the Black Knight Board of Directors or by the Risk Committee of the Black Knight Board of Directors. Such waivers will be disclosed as may be required by the rules and regulations of the Securities and Exchange Commission and the New York Stock Exchange.



Proprietary



Reporting Possible Violations Compliance and Ethics Hotline Investigations Non-Retaliation Policy

Compliance and Ethics Hotline

833.B.Knight (833.256.4448) (U.S.) or 000-117 then, when prompted: 833.B.Knight (833.256.4448) (India) http://www.blackknight.ethicspoint.com



Reporting Possible Violations

Early identification and resolution of illegal and unethical issues are critical to maintaining our high ethical standards. As part of Black Knight's commitment to adhere to the highest standards of business conduct and ethics, 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.

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 following:

- Immediate supervisor
- Human Resources Department: Black.Knight.Human.Resources@bkfs.com
- Corporate Compliance Department: CorporateCompliance@bkfs.com
- **Compliance and Ethics Hotline**
- Legal Department
- Internal Audit Department: InternalAudit@bkfs.com

Compliance and Ethics Hotline

For Calls Within the U.S.:	833.B.Knight (833.256.4448)
For India Calls:	000-117 then, when prompted:
	833.B.Knight (833.256.4448)
To Report Online:	www.blackknight.ethicspoint.com

Black Knight 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.

Q:

I observed a situation that I suspect might be a violation of our Code of Business Conduct and Ethics. Should I report the situation even though I am not certain a violation has occurred?

A:

Yes, you should report the situation. No adverse action will be taken against an employee who makes a report in good faith, regardless of whether the report proves well-founded.

Black Knight has robust processes in place to review and investigate reports made via the Company's Compliance and Ethics Hotline, as detailed in the "Investigations" section of this Code. Information concerning methods for reporting possible violations is proactively communicated to employees during new hire training and employees also periodically receive this information throughout the course of their Black Knight employment during annual compliance training, regular compliance communications, information on the Company intranet, and posters throughout the office.

Investigations

Black Knight's Corporate Compliance Department, Legal Department, Human Resources Department, Internal Audit 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, an investigator, internal or external auditors, Black Knight counsel, Black Knight representatives, or regulators is prohibited. Failure to cooperate fully or making false or misleading statements to investigators is grounds for immediate termination of employment or other relationship with Black Knight and may also result in criminal penalties. Employees should never withhold or fail to communicate information that raises ethical or legal questions. If it is found that misconduct has occurred, Black Knight is committed to taking prompt action to correct the situation and, when appropriate, use corrective action to discipline responsible individuals.



Non-Retaliation Policy

Black Knight 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 Black Knight or to a proper government official or agency.

Q:

I made a report about a colleague's misconduct, will I be penalized because I made the report?

A:

No, Black Knight prohibits retaliation against anyone who reports misconduct. If you believe that you are being retaliated against you should report you concern to your manager, Human Resources, or the Compliance and Ethics Hotline.



Individual Responsibility

Employee Responsibilities

Managerial Responsibilities

Compliance and Ethics Hotline

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Individual Responsibility

Black Knight is made up of thousands of people, each with unique values and aspirations. One of the responsibilities we share is to act with honesty and strong ethical standards. Black Knight has established a culture of honesty and integrity and untruthful or deceptive employee conduct is prohibited.

Employee Responsibilities

As a Black Knight employee, you are responsible for:

- Complying with all laws, rules and regulations, this Code, and Company policies.
- Seeking guidance if you have any questions about specific compliance concerns or proper 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.

Managerial 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 responsible for:

- Assisting employees who report to you with understanding how to comply with applicable laws, rules and regulations, this Code, and Company policies.
- Assisting employees with questions or concerns • about compliance and ethics issues.
- . Addressing or escalating employees' reports of suspected misconduct.
- . Taking reasonable measures to detect and deter misconduct and demonstrating appropriate leadership to achieve compliance.



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Responsibility to Each Other

Respect and Fair Treatment Equal Employment Opportunity Non-Discrimination and Harassment-Free Workplace Alcohol and Drug Use Safety

Employees' Confidential Information

Compliance and Ethics Hotline

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Responsibility to Each Other

For additional information on topics covered in this section, please refer to the Employee Handbook.

Respect and Fair Treatment

Our success as a company and as individuals depends on the unique contributions of all the people with whom we work. We sustain an ethical culture by treating each other with honesty, respect, and fair treatment.

Equal Employment Opportunity

Black Knight 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.

Do the Right Thing

- Never take part in conduct that is hostile or threatening nor encourage others to do so.
- Never use Black Knight 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.
- Promptly report incidents involving discrimination or harassment to the Human Resources Department or the Compliance and Ethics Hotline.

Q:

A co-worker sent a sexually suggestive joke to my work email account. What should I do about this?

A:

You should contact your supervisor, your Human Resources representative, or the Compliance and Ethics Hotline to report your concern. Black Knight systems should never be used to transmit emails that are offensive or lewd in nature.

Non-Discrimination and Harassment-Free Workplace

Black Knight values a work environment where diversity is embraced and where employees' differences are valued and respected. Black Knight provides a work environment that is free from intimidation, hostility and other behaviors that might interfere with work performance. Black Knight prohibits any kind of discrimination, harassment, or intimidation, whether committed by or against a supervisor, co-worker, customer, vendor, or visitor. Discrimination and harassment, whether based on a person's race, gender, gender identity or expression, color, creed, religion, national origin, citizenship, age, disability, marital status, sexual orientation, ancestry, veteran status, socioeconomic status or any other characteristic protected by applicable laws and regulations, are strictly prohibited.

Respect and fair treatment does not include:

- Making inappropriate gestures, including visual staring.
- Any logos or graphics worn by an employee must not reflect any form of violence, discriminatory abuse, offensive, demeaning or an otherwise unprofessional message.
- Threatening, intimidating, coercing, or otherwise interfering with the job performance of fellow employees or visitors.

If you believe you are being subjected to discrimination or harassment, or if you observe or receive a complaint regarding such behavior, promptly report it to the Human Resources Department or the Compliance and Ethics Hotline.



Alcohol and Drug Use

Drug and alcohol abuse 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.

Occasionally, the Company may approve the use of alcohol at official Company events. Your use of alcohol at approved Company events is acceptable as long as it is consumed responsibly and in moderation. Driving while under the influence of alcohol is unlawful and strictly prohibited. You are responsible for ensuring you have safe transportation from an event at which alcohol is served.

Safety

Black Knight 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. Refer to the Employee Safety Handbook, which is available on the Company's intranet website. Questions about these laws and guidelines should be directed to the Human Resources Department or Legal Department.

Employees' Confidential Information

Black Knight respects and protects employees' confidential information. Consistent with applicable laws, Black Knight 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.

Q:

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?

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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.



Responsibility to Our Customers, Business Partners, and Company

Fraud **Improper Payments** Protection of Customers' Personal Information Protection of Cardholder Information **Regulatory Policies Doing Business with Prohibited Persons** Antitrust and Fair Competition Anti-Boycott Laws

Compliance and Ethics Hotline

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Responsibility to Our Customers, Business Partners, and Company

Fraud

All employees are expected to be vigilant in discovering evidence of possible fraud that might affect Black Knight. Fraud is the material misrepresentation or deliberate act of an employee, customer, or service provider with the purpose of deceiving or cheating Black Knight, 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:

- Forgery or alteration of checks, securities, invoices, policies, or accounting records;
- Any misappropriation of Black Knight funds, securities, supplies, furniture, equipment or other assets; or
- Any misuse of Black Knight corporate credit cards.

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.

Improper Payments

The use of Black Knight 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.

Q:

One of my good customers has asked me to pay for renovations to her office. Would this be okay since I have a long-standing relationship with this customer?

A:

No, this is not okay under any circumstance. This type of payment could be seen as a kickback or improper payment. Any questions on this topic should be referred to Corporate Compliance Department or the Compliance and Ethics Hotline.

Protection of Customers' Personal Information

The Safeguards Rule, implemented as part of the Gramm-Leach-Bliley Act, and other federal and state laws and regulations provide specific guidelines regarding the privacy, protection and security of a customers' 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 consumer'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. The Company is obligated to protect the consumer information of our clients. All employees must strictly comply with Company policies and relevant laws and regulations relative to the protection and use of protected personal information.



Protection of Cardholder Information

The Payment Card Industry Data Security Standards (PCI DSS) are a widely accepted set of industry standards intended to optimize the security of credit, debit and cash card transactions and protect cardholders against misuse of their personal 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 and contracts relative to the protection of cardholder information.

Do the Right Thing

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

For more information on this topic, refer to the Corporate Information Security Policy and Privacy Policy.

Regulatory Policies

In conducting business on behalf of Black Knight, you should be familiar with and carefully consider the following regulatory policies:

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.

Q:

I am working with an agent in a foreign country. I have some concern that some of the money we are paying the agent may be going toward paying bribes to government officials, but I have no actual knowledge that bribes have been paid. Should I report my concerns?

A:

Yes, you should report your concerns to the Legal Department, Corporate Compliance Department or the Compliance and Ethics Hotline. Black Knight does not approve and can be held liable for bribes made to foreign government officials, even if an agent or subcontractor makes the bribes.

Contact with Government Officials

Many countries, states and local jurisdictions have antibribery and anti-corruption laws restricting gifts (meals, entertainment, transportation, lodging or other things of value) that may be provided to government officials. In the U.S., the Foreign Corrupt Practices Act of 1977 ("FCPA") outlines very serious prohibitions against bribery, including the payment or promise of payment of anything of value with corrupt intent, to foreign officials (including any person employed by or representing a foreign government, officials of a foreign political party, officials of public international organizations and candidates for foreign office) in order to obtain or retain business or secure any improper advantage. Improper gifts, payments or offerings of anything of value to foreign officials could be a violation of anti- bribery and anti-corruption laws and could jeopardize the Company's growth and reputation. Payments made indirectly through a consultant, contractor or other intermediary are also prohibited. All employees and contractors are required to annually acknowledge Black Knight's Anti-Corruption Policy.

Certain foreign bribery laws, including the United States' FCPA, provide an exemption for "facilitation" or "grease" payments made to expedite routine governmental actions. However, facilitation payment exceptions are construed narrowly and, equally important, most other relevant antibribery laws do not contain such an exception. These payments are almost always in violation of local laws in the countries in which Black Knight conducts business. For these reasons, Black Knight does not permit such payments, no matter how small and no matter how common they may be. For more information on this topic, refer to the Anti-*Corruption Policy and the Gift and Entertainment Policy.*



Doing Business with Prohibited Persons

Black Knight fully complies with U.S. 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. 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.

For more information on this topic, refer to the Office of Foreign Assets Control Policy and Procedures.

Do the Right Thing

- Do not give a gift of any kind to a government official without obtaining prior approval from Corporate Compliance or Legal.
- Do not offer anything of value to a government official . for the purpose of influencing the recipient to take or refrain from taking any official action, or to induce the recipient to conduct business with Black Knight.
- Do not participate in any transaction that is, or gives the appearance of the submission of, a false claim, statement or record to the federal government, any state government, or any other party.

Antitrust and Fair Competition

Black Knight 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 Black Knight and the responsible employee(s). Black Knight 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.

Q:

I have heard that trade association members should avoid certain activities and discussions at meetings. What are the issues that should be avoided?

A:

Remember that members of trade associations may also be our competitors. Therefore, you should avoid meetings or discussions regarding rates or prices.

Specific Antitrust Concerns

Product User Groups and Advisory Boards Holding advisory meetings with our clients is a recognized method of furthering legitimate business interests of Black Knight. However, these functions also provide a setting at which the temptation may be present for competitors to discuss matters that may constitute violations of antitrust laws.

For these meetings, a written agenda should be distributed in advance of the meeting and the agenda should be followed during the course of the meeting. The agenda should include Black Knight's standard statement on Antitrust which can be obtained from Corporate Compliance.

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.

Black Knight is required to report any request to take action, or any attempt to reach agreement on such action, that would violate these prohibitions.



ResponsibilitytoOurCommunities

Investor and Media Relations **Government Requests Community and Professional Involvement** Individual Political Activity **Corporate Political Contributions Charitable Contributions Lobbying Activities** Public Office **Environmental Protection**

Compliance and Ethics Hotline

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Responsibility to Our Communities

Investor and Media Relations

As a publicly-traded company, Black Knight 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.

The company strives to anticipate and manage crisis situations in order to reduce disruptions to our employees and to maintain our reputation as the premier provider of software, data and analytics solutions. To best serve these objectives the company will respond to the news media in a timely and professional manner only through designated spokespersons.

Do the Right Thing

- Refer all requests for investor-related information to the Investor Relations department at Investor@bkfs.com.
- Refer all media requests to Corporate Communications and Marketing at Corporate.Communication@bkfs.com.
- For more information about this topic, refer to the Black Knight Media Policy located on www.myblackknight.com.

Government Requests

Black Knight cooperates fully with requests made by government agencies and authorities, including taxing authorities and insurance regulators, through authorized employees only. All requests from government agencies and authorities for information should be immediately referred to the Corporate Compliance department.

Q:

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

A:

All requests from government agencies and authorities should be immediately forwarded to the Corporate Compliance Department at CorporateCompliance@bkfs.com.

Community and Professional Involvement

Black Knight 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 Black Knight unless specifically authorized to do so.

Although employees are permitted to hold director and trustee positions in other organizations, these positions may sometimes have legal consequences or other ramifications to Black Knight. Director and officer liability insurance carried by Black Knight will not extend to an employee serving as a director or an officer of another organization unless the employee is serving at the written direction of Black Knight. Your immediate supervisor must approve any such direction, and a copy must be sent to the Legal Department for appropriate notification to the insurance company.

Do the Right Thing

- Refer all government requests for information to the Corporate Compliance Department.
- 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 Black Knight and the employee to criminal penalties.



Proprietary

Individual Political Activity

Black Knight 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 a Black Knight representative. Employees may not work on political activities while on company time or use Black Knight property or facilities for these activities. No one at Black Knight may require a Black Knight employee to contribute to, support or oppose any political group or candidate.

Do the Right Thing

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

Do the Right Thing

Unless specifically authorized by Black Knight:

- Do not make contributions on behalf of Black Knight 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 Black Knight'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.

Q:

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 Black Knight in support of her candidacy?

A:

No. Under no circumstance should political contributions be made on behalf of Black Knight to candidates for any federal office.

Under no circumstance shall political contributions be made on behalf of Black Knight 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 Black Knight.

Charitable Contributions

Black Knight 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 Black Knight or its subsidiaries, refer to the procedures outlined in the Charitable Contributions section of the Anti-Corruption Policy.

Human Rights

Black Knight is committed to making a positive impact on the people and communities where we work. Black Knight'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 the Employee Handbook and this Code.



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.

In general, employees should not engage in lobbying activities on behalf of Black Knight. Some Black Knight employees are specifically authorized to lobby or otherwise communicate with elected officials or government employees on behalf of Black Knight. Due to the complexity of laws dealing with lobbying, all planned contacts with such individuals are subject to prior written approval from the Legal Department.

Do the Right Thing

 Do not engage in lobbying activities on behalf of Black Knight 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 senior management and the Legal Department. Statutory requirements may render such appointment or election to public office improper unless assurances are given that business relations between Black Knight and the government agency in which you would serve would not be prohibited. In the event that the appointment involves Black Knight's Chief Executive Officer, the CEO must seek approval from Black Knight's Board of Directors to obtain authorization for such nomination or appointment.

Environmental Protection

Black Knight is committed to protecting and conserving the environment. The Company cooperates with government bodies and communities in environmental protection efforts and complies with environmental laws and regulations.



Proprietary

ResponsibilitytoOurShareholders

Accounting and Financial Reporting Accuracy and Retention of Business Records **Conflicts of Interest Related Party Business Dealings Corporate Opportunities** Gifts and Entertainment Inside Information and Securities Trading Personal Investments in Black Knight Securities Protecting Company Assets **Protecting Confidential Information Proprietary Rights** Use of Company Name, Facilities or Relationship Web Presence and Social Media Use

Compliance and Ethics Hotline

833.B.Knight (833.256.4448) (U.S.) or 000-117 then, when prompted: 833.B.Knight (833.256.4448) (India) http://www.blackknight.ethicspoint.com



Responsibility to Our Shareholders

Accounting and Financial Reporting

Black Knight 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:

- transactions are executed in accordance with management's general or specific authorizations;
- transactions are recorded for the preparation of financial statements in conformity with generallyaccepted 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.

Black Knight fully and fairly discloses the financial condition and results of operations of Black Knight 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 Black Knight's reputation for integrity. To meet its obligations, Black Knight 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 Black Knight'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:

I have been requested to make an accounting entry that I do not feel is accurate or justified. What should I do?

A:

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, Internal Audit Department, Corporate Compliance Department or the Compliance and Ethics Hotline.

Do the Right Thing

- Do not use Black Knight funds or assets for any purpose that violates Black Knight policy.
- Do not maintain or establish undisclosed or unrecorded funds or assets of Black Knight for any purpose.
- Do not make any false entries on the books or records of Black Knight, including expense reports or other requests for reimbursement.
- Do not make or approve payments on behalf of Black Knight 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 Black Knight's Internal Audit Department, Corporate Compliance Department or the Compliance and Ethics Hotline.

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



Proprietary

Black Knight employees are prohibited from taking any action to fraudulently influence, coerce, manipulate, or mislead any independent public accountant engaged to perform audit or non-audit services for Black Knight. 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 nonaudit or audit engagements if the auditor objects to Black Knight's accounting practices or policies;
- seeking to have a partner of the auditor removed from the audit engagement because the partner objects to Black Knight's accounting practices or policies; and blackmailing or making physical threats to an auditor.

Accuracy and Retention of Business Records

Black Knight's 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 Black Knight is prohibited. In addition, the books, records and other documents of Black Knight must not be organized or presented in a way that intentionally conceals information or misleads or misinforms the recipient of the information.

Refer to Black Knight's Record Retention and Information Management Policy regarding the requirements for record retention and disposal of business records. Business records include paper documents (originals and photocopies), telephone voicemail, electronic email and other computer records. The length of time that Black Knight 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 breach or potential breach of Black Knight's Record Retention and Information Management Policy, immediately notify Black Knight's Corporate 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 lawsuit, 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 Black Knight business records except in compliance with Black Knight's Record Retention and Information Management Policy.



Conflicts of Interest

Black Knight'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. A "conflict of interest" occurs when an individual's private interest interferes or appears to interfere with Black Knight's interest. Any situation that creates or appears to create a conflict between personal interests and the interests of Black Knight must be avoided. Potential or actual conflicts of interest must be reported to the Corporate Compliance Department or the Compliance and Ethics Hotline for review.

For additional information on conflicts of interest, refer to the Employee Handbook.

Related Party Business Dealings

You must notify the Corporate Compliance Department of any business relationship or proposed business transaction Black Knight may have with any company in which you or a related party 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 Corporate Compliance Department if you or a family member owns or controls property of significant value that Black Knight 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 1 percent of the outstanding publicly-traded equity securities of such company.

Q:

My wife is opening an office supply store and would like to approach Black Knight to solicit its business for purchasing office supplies. Is this a conflict of interest?

А:

It could be a conflict of interest. Your wife may approach Black Knight to solicit its business as long as you have no responsibility for procuring these services and you are not involved in the selection process. You should always disclose these types of situations to your supervisor and report it to Corporate Compliance.

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 Black Knight in any way.

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.

If you have any question about the appropriateness of accepting or giving a gift or invitation, you should discuss the matter with your immediate supervisor or with the Corporate Compliance Department prior to accepting or giving the gift.

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

Do the Right Thing

Accepting Gifts and Entertainment

- Never accept a gift under circumstances in which it could appear to others that your business judgment could be compromised, such as accepting a gift in return for a preferential business arrangement.
- Do not accept or allow a close family member to accept gifts, services, loans or preferential treatment from anyone in exchange for a past, current or future business relationship with Black Knight.

Giving Gifts and Providing Entertainment

• Do not give a gift if others could see the gift as engaging in bribery or a consideration for an official or business favor.



Inside Information and Securities Trading

In performing your duties at Black Knight, you may learn important material information about Black Knight 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 information is nonpublic information that a reasonable investor would likely consider important in deciding whether to buy, sell or hold a security. **Inside 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;
- the company's financial condition or operating results, including earnings information and forecasts; and
- regulatory developments.

Employees are prohibited from trading Black Knight securities or the securities of other companies while they are aware of material inside information that is not publicly available. Employees are also prohibited from disclosing information to other people. Substantial civil penalties and criminal sanctions may be imposed on Black Knight and the employee for noncompliance with securities laws. Non-employees (i.e., an employee's spouse, friend, or broker) can also be held liable for trading on inside information that an employee provided to them.

Q:

A friend of mine, who works at another company, informed me while we were at the gym that their company is about to acquire another company. The acquisition has not been made public and, once announced, I believe it will increase the company's stock price. I would like to buy the stock now and advise my friends and family to do the same. Can I do this?

A:

No, you cannot buy the stock or advise anyone else to buy it since you are aware of material non-public information. Doing so would violate insider trading laws and subject you to civil or criminal penalties.

Do the Right Thing

- Do not buy or sell securities based upon material nonpublic information.
- Do not give tips or suggestions to friends, family, or acquaintances to buy or sell securities when you have material inside information.
- Consult the Legal Department if you are uncertain about the legal rules involving the purchase or sale of any Black Knight security or any securities in companies that you are familiar with by virtue of your position at Black Knight.



Proprietary

Personal Investments in Black Knight **Securities**

Black Knight supports employee stock ownership. Investments in Black Knight securities (or the securities of its publicly-traded subsidiaries) for personal accounts with a long-term orientation and as part of a broader investment strategy. In order to comply with applicable law and avoid the appearance of impropriety, the following general restrictions apply to all transactions in Black Knight securities:

- Employees are prohibited from trading in Black Knight securities for their personal accounts if they possess material nonpublic information about Black Knight.
- Employees are responsible for knowing and abiding by any Black Knight corporate or division policies regarding Black Knight securities that may be applicable to them.
- Black Knight directors and its most senior officers are subject to reporting and other legal restrictions regarding their personal trading of Black Knight securities.

Black Knight reserves the right to monitor any account for suspicious activity.

Protecting Company Assets

All of us are responsible for using sound judgment 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 Corporate Information Security Policy.

Protecting Confidential Information

While working for Black Knight and continuing after employment or association with Black Knight has ceased, you must protect the confidentiality of nonpublic

information obtained or created in connection with your employment at Black Knight. You must not disclose proprietary or confidential information about Black Knight or its employees, or confidential information about a customer, agent or other individuals to anyone (including other Black Knight personnel) who is not authorized to receive it nor has a need to know the information.

Examples of proprietary and confidential information include:

- any system, information or process that gives Black Knight an opportunity to obtain an advantage over its competitors;
- nonpublic information about Black Knight's operations, results, strategies, projections, business plans, business processes, and client relationships;
- nonpublic employee information; other than your own
- nonpublic information received in the course of your employment about the Company's clients or "personally identifiable information" of our clients' customers; and
- nonpublic information about Black Knight's technology, systems and proprietary products.

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

- the customer;
- applicable law (i.e., to supervisory regulators); .
- appropriate legal process (i.e., subpoena); or
- appropriate Black Knight authorities.

For additional information, refer to the Corporate Information Security Policy and the Privacy Policy.

Q:

I sometimes use email to send personal messages when I am at work. Is that okay?

Δ:

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.



Proprietary Rights

Employees are required to disclose and assign to Black Knight all interest in any invention, improvement, discovery or work of authorship made or conceived that arises out of or in connection with employment with Black Knight. 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 Black Knight.

Do the Right Thing

- Safeguard confidential information by keeping it physically and electronically secure.
- Do not disclose confidential information to persons outside Black Knight, 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 off site.

Use of Company Name, Facilities or Relationships

Use of Black Knight'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 Black Knight's web presence is restricted to members of the Corporate Communications and Marketing Department subject to certain limited exceptions.

If you are required or authorized to use social media as part of your job duties, you must submit an Information Security policy exception via the Company Intranet to gain access to the social media site. If access is approved, you must follow the Standards for Employee's Responsible Use of Social Media found in the Employee Handbook.

Personal use of social media using Black Knight's systems is not permitted at any time.

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

Do the Right Thing

- Do not use trademarks, logos or other intellectual property of Black Knight while engaging in personal social media activity.
- Do not reveal any non-public or sensitive information about the Company while engaging in social media activity.



Proprietary

This Code does not constitute an employment contract, and nothing in this Code changes the at-will nature of employment with Black Knight. Adherence to this Code is a condition of employment or continued employment with Black Knight. Annual Code certification is part of this requirement, and failure to do so within the required time could result in termination of employment.

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