

CODE OF BUSINESS CONDUCT & ETHICS

A Message from Patti Cook, Chief Executive Officer

Finance of America Companies' vision is to build a portfolio of businesses that together service each phase of the customer's financial lifecycle. From mortgages, to lending, to various other financial services, we deliver a positive customer experience and do business with a personal touch. Our products and our employees complement and support each other. This allows us to execute on our ambitious vision and stay resilient even in the face of challenging conditions.

Across all our brands, we are deeply committed to our employees as well as to our customers. Our people are the heart and soul of all that we do. We are focused on nurturing a strong culture where constructive ideas are welcome, innovation is rewarded, and our shared successes are celebrated.

This Code of Business Conduct and Ethics is a resource for ensuring a consistent understanding of what Finance of America Companies expects of you, and what our customers, business partners and shareholders expect of us.

Thank you for being part of our company and doing your part to ensure our success.



Patti Cook
Chief Executive Officer
Finance of America Companies

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Introduction

Finance of America Companies Inc. and its direct and indirect subsidiaries (“Finance of America Companies” or “the Company”) is committed to being a professional, responsible, and law-abiding business organization and has adopted this this Code of Business Conduct and Ethics (“the Code”) in furtherance of this commitment. This Code applies to all directors, officers and employees of the Company (the “Covered Parties”). The Company’s policies, as well as this Code, require every Covered Party to agree not to take any action or engage in any conduct that would be unlawful or that creates the appearance of impropriety, or otherwise causes or contributes to the Company or other Covered Parties being held in disrepute by the general public, the Company’s employees or those with whom the Company does business.

Compliance with the Code

The Code covers a wide range of business practices and procedures that set out basic principles to guide all Covered Parties. All Covered Parties must read the Code carefully and are required annually to sign an acknowledgement, reaffirming their commitment to the principles in the Code and acknowledging the fact that they understand the contents as well as the consequences of non-compliance. In the case of non-employee directors, compliance with this Code is subject to the provisions of the Company’s Certificate of Incorporation, Bylaws and any stockholder’s agreement with the Company.

Accountability for Violations

If the Audit Committee, Chief Legal Officer or their designee, as applicable, determines that this Code has been violated, either directly, by failure to report a violation, or by withholding

information related to a violation, the offending person may be disciplined for noncompliance with penalties up to and including removal from office or dismissal. Such penalties may include written notices to the individual involved that a violation has been determined, a written letter of reprimand by the Audit Committee, disgorgement, demotion or re-assignment of the individual involved, suspension with or without pay or benefits and termination of employment. Violations of this Code may also constitute violations of law and may result in criminal penalties and civil liabilities for the offending person and the Company. All persons subject to this Code are expected to cooperate in internal investigations of misconduct.

Waivers

Any waiver of this Code for executive officers or directors may be made only by the Board of Directors or a committee of the Board of Directors and will be promptly disclosed as required by law or stock exchange regulation. Any waiver of this Code for employees who are not directors or executive officers may be made by the Company's Chief Legal Officer.

Whistleblower Policy

The purpose of this policy is to state clearly and unequivocally that the Company prohibits discrimination, harassment and/or retaliation against any Covered Party who provides information or otherwise assists in an investigation or proceeding regarding any conduct which he or she reasonably believes to be a violation of law, Company policies and concerns, complaints regarding accounting, internal accounting controls and auditing matters, federal securities laws, violations of federal laws regarding mail fraud, wire, or bank fraud, the rules or regulations of the Securities and Exchange Commission ("SEC"), or any provision of federal law relating to fraud against stockholders. Everyone at the Company is responsible for assuring that the workplace is free from all forms of discrimination, harassment and retaliation prohibited by this Code. No Covered Party nor any agent, contractor or subcontractor of the Company has the authority to engage in any conduct prohibited by this policy.

Covered Parties have a duty to report misconduct or violations of the law, the Code or company policy.

This policy protects any Covered Party who, among other things:

- Provides information, causes information to be provided, or otherwise assists in an investigation regarding what the Covered Party reasonably believes to be an alleged violation of the federal securities laws, the federal laws regarding mail fraud, wire, or bank fraud, the rules or regulations of the SEC, or any provision of federal law relating to fraud against stockholders to a federal regulatory or law enforcement agency, any member or committee of Congress, any person with supervisory authority over the Covered Party, or any other person working for the Company who has the authority to investigate, discover or terminate misconduct ;
- Files, causes to be filed, testifies, participates in, or otherwise assists in a proceeding filed or about to be filed under the federal securities laws, the federal laws regarding mail fraud, wire, or bank fraud, the rules or regulations of the SEC, or any provision of federal law pertaining to fraud against stockholders; or
- Makes a confidential complaint, whether anonymous or otherwise, about questionable accounting, internal accounting controls, or auditing matters at the Company.

If a Covered Party engages in any of the activities listed above, the Company will not discharge, demote, suspend, threaten, harass or otherwise discriminate or retaliate against him or her in the terms or conditions of employment because of that activity.

There are several ways to report concerns or complaints under this policy, including:

- By notifying his/her manager or supervisor or a member of the management team of the Company;
- By contacting a Human Resources representative;
- By contacting the Ethics Hotline at 844-591-0570 or www.financeofamericacompanies.ethicspoint.com and providing your name and contact information or making an anonymous report or complaint.

Upon receiving a complaint, the Company will promptly conduct an objective investigation. It is the obligation of all Covered Parties to cooperate in such investigation. Those responsible for the investigation will maintain the confidentiality of the allegations of the complaint and the identity of the persons involved, subject to the need to conduct a full and impartial investigation, remedy any violations of the Company's policies, or monitor compliance with or administer the Company's policies. The Company prohibits retaliation against any Covered Party who makes a legitimate complaint under this policy or participates in the Company's investigation. Covered Parties may not knowingly and falsely file a complaint. While we encourage you to provide as much detail as possible when reporting a concern or complaint, where allowed by local law, you may choose to remain anonymous and not identify yourself when reporting a concern, including a concern regarding questionable accounting or auditing matters.

Insider Trading

Covered Parties may not provide any kind of confidential information about the Company to anyone outside the Company. This prohibition extends to family members who reside with the Covered Party, anyone else who lives in the Covered Party's household and any family members who do not live in the household but whose transactions in securities are directed by the Covered Party or are subject to their influence or control.

Federal securities laws generally prohibit trading in the securities of a company if aware of "inside" information. These transactions are commonly known as "insider trading". It is also illegal to recommend to others (commonly called "tipping") that they buy, sell or retain the securities of a company to which such inside information relates. This includes any communication providing inside information on social media or other internal or external Internet platforms. Anyone violating these laws is subject to personal liability and could face significant fines and criminal penalties, including imprisonment.

The prohibition applies to Company securities and to securities of other companies if Covered Parties learn material nonpublic information about other companies, such as the Company's customers, vendors, competitors or acquisition targets, as a result of employment with or relationship to the Company.

Information is considered "material" if a reasonable investor would consider it important in deciding whether to buy, sell, or hold a security. The information may concern the Company or another company and may be positive or negative. In addition, it should be emphasized that material information does not have to relate to a company's business; information about the contents of a forthcoming publication in the financial press that is expected to affect the market price of a security could well be material. Covered Parties should assume that information that would affect one's consideration of whether to trade, or which might tend to influence the price of the security, is material.

Confidentiality

Covered Parties should be careful not to divulge information about the Company, even accidentally. Covered Parties regularly come into possession of Confidential Information (as that term is defined below) in the course of the Company's business. The Company is committed to protecting Confidential Information, whether generated within the Company or obtained from some other source. The Company is also strongly committed to avoiding the misuse, or the appearance of misuse, of such information, whether in connection with the trading of securities or otherwise.

In the course of his or her participation in the work of the Company, a Covered Party may obtain or have access to non-public information that might be of use to competitors, or harmful to the Company or its clients if disclosed. Such information may have been or may be provided in written or electronic form or orally. All such information, from whatever source obtained and regardless of the Company's connection to the information, is referred to as "Confidential Information." Confidential Information excludes information that has been made generally available to the public. However, information that when viewed in isolation may be publicly known or can be accessed by a member of the public will constitute Confidential Information for these purposes if such information has become proprietary to the Company through the Company's (whether by itself or on its behalf) aggregation or interpretation of such information.

Because Confidential Information constitutes a valuable asset of the Company, without the prior written consent of the Chief Legal Officer (which may be given or withheld in his or her sole discretion) or unless legally mandated, no Covered Party may, while employed by or associated with the Company or at any time thereafter, (a) disclose any Confidential Information to any person except in furtherance of the business of the Company, (b) make any other use of any Confidential Information except in the business of the Company and in a manner which at all times is intended to serve the interests of the Company or (c) disclose any information (whether or not Confidential Information) concerning the Company or its present or former employees, clients or investors to any reporter, author or similar person or entity or take any other action likely to result in such information being made available to the public in any form, including books, articles or writings of any other kind, film, videotape, electronic means of communication or any other medium. You are also expected to know and observe all applicable privacy laws, such as the Gramm-Leach-Bliley Act.

Covered Parties who fail to comply, either in letter or spirit, with these important policies may be subject to disciplinary action, up to and including termination of employment. The Company may pursue appropriate legal action against present or former Covered Parties to enforce these policies.

Notwithstanding the foregoing, and notwithstanding any other confidentiality or non-disclosure agreement (whether in writing or otherwise, including without limitation as part of an employment agreement, separation agreement or similar employment or compensation arrangement) applicable to current or former employees, the Company does not restrict any current or former employee from communicating, cooperating or filing a complaint with any U.S. federal, state or local governmental or law enforcement branch, agency or entity (collectively, a "Governmental Entity") with respect to possible violations of any U.S. federal, state or local law or regulation, or otherwise making disclosures to any Governmental Entity, in each case, that are protected under the whistleblower provisions of any such law or regulation, provided that (i) in each case such communications and disclosures are consistent with applicable law and (ii) the information subject to such disclosure was not obtained by the current or former employee through a communication that was subject to the attorney-client privilege, unless such disclosure of that information would otherwise be permitted by

an attorney pursuant to 17 CFR 205.3(d)(2), applicable state attorney conduct rules, or otherwise. Any agreement in conflict with the foregoing is hereby deemed amended by the Company to be consistent with the foregoing.

Conflicts of Interest

Covered Parties are expected to use good judgment, to adhere to ethical standards, and to avoid situations that create an actual or perceived or potential conflict between the Covered Party's personal interests and the interests of the Company. A conflict of interest exists where the Covered Party's loyalties or actions are divided between the Company's interests and those of another, such as a competitor, supplier, or customer. Both the fact and the appearance of a conflict of interest must be avoided. Covered Parties must disclose any possible conflicts so that the Company may assess whether a conflict of interest exists or there is a potential conflict of interest. A potential conflict of interest occurs whenever a Covered Party is in a position to influence a decision that may result in a personal gain for the Covered Party or an immediate family member because of the Company's business dealings. Covered Parties who are unsure as to whether a certain transaction, activity, or relationship constitutes a conflict of interest should discuss it with their immediate supervisor or manager, or the Chief Human Resources Officer or the Legal Department for clarification.

While it is not feasible to describe all possible situations when a conflict of interest could develop, some of the more common conflicts, from which Covered Parties are to refrain, include the following:

- Accepting personal gifts or entertainment from competitors, customers, suppliers, or potential suppliers beyond nominal value;
- Indebtedness between managers and anyone junior to them and between employees can create conflicts of interest or the appearance of a conflict of interest. Covered Parties should not put themselves in situations where they may become indebted to another employee, manager or Covered Party;
- Using proprietary or confidential Company information for personal gain or to the Company's detriment;
- Having a real estate license that is in any way associated with a brokerage;
- Having a direct or indirect financial interest in or relationship with a competitor, customer, or supplier (except that ownership of a publicly traded stock of a corporation not to exceed 5% of such corporation's stock is not considered a conflict);
- Using Company assets or labor for personal use on Company property, or during Company working hours;
- Acquiring any interest in property or assets of any kind for the purpose of selling or leasing it to the Company;
- Committing the Company to give its financial or other support to any outside activity or organization; and
- Developing a personal relationship with a subordinate employee of the Company or with any other employee of the Company, that might interfere with the exercise of impartial judgment in decisions affecting the Company or any employees of the Company.

Corporate Opportunities

Except as may be permitted by the Company's Certificate of Incorporation, Bylaws or any stockholders agreement with the Company, Covered Parties are prohibited from (1) taking for themselves opportunities that are discovered through the use of Company property, information or position, (2) using Company property, information or position for improper personal gain and (3) competing with the Company directly or indirectly. All Covered Parties of the Company owe a duty to the Company to advance its legitimate interests whenever possible.

Fair Dealing

Covered Parties shall behave honestly and ethically at all times and with all people. Covered Parties shall act in good faith, with integrity and due care, and shall engage only in fair competition, by treating ethically colleagues, competitors and other third parties.

Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing improper disclosure of such information by past or present employees of other companies is prohibited. No Covered Party should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or similar unfair practice.

The purpose of business entertainment and gifts in a commercial setting is to create good will and sound working relationships, not to gain unfair advantage with clients and partners. In addition, the various branches and levels of government have different laws restricting gifts, including meals, entertainment, transportation and lodging, that may be provided to government officials and government employees. No gift or entertainment should ever be offered or accepted by any Covered Party or any of their family members unless it (1) is consistent with customary business practices, (2) is not excessive in value, (3) cannot be construed as a bribe or payoff and (4) does not violate any laws or regulations. The offer or acceptance of cash gifts or cash equivalents to or from an investor, prospective investor, or any entity that does or seeks to do business with or on behalf of the Company by a Covered Party is prohibited. You should discuss with a member of the Company's Legal Department, his or her designee or such other appropriate person, any gifts or proposed gifts that you think may be inappropriate.

Protection and Proper Use of Company Assets

Covered Parties should endeavor to protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have an impact on the Company's profitability. Any suspected incident of fraud or theft should be immediately reported to the Chief Legal Officer for investigation. The Company's equipment should not be used for non-Company business, though incidental personal use is permitted.

Compliance with Laws, Rules and Regulations

Obeying the law is the foundation on which the Company's ethical standards are built. In conducting the business of the Company, Covered Parties shall comply with applicable governmental laws, rules and regulations, including insider trading laws, at all levels of government in the United States and in any non-U.S. jurisdiction in which the Company does business. Although not all persons subject to this Code are expected to know the details of these laws, it is important to know enough about the applicable local, state and national laws to determine when to seek advice from the Company's Legal Department, its designee or such other appropriate person.

Disclaimer

This Code is designed to acquaint directors, officers and employees with the Company's policies with respect to business conduct and ethics. The information contained in this Code is not intended to represent all of the Company's policies. In addition, directors, officers and employees should be aware that the Company may revise, supplement or rescind any policies or portions of this Code at any time as it deems appropriate, in its sole and absolute discretion. This Code is the property of the Company.

Company's Ethics Hotline

To Report via phone: 844-591-0570

To Report online: www.financeofamericacompanies.ethicspoint.com.

The Ethics Hotline is available 24 hours a day, 7 days a week and 365 days a year.

Reports may be filed anonymously with the third-party service provider noted above.

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