Fair Isaac Corporation
CODE OF BUSINESS CONDUCT AND ETHICS

Introduction

This Code of Business Conduct and Ethics ("Code") of Fair Isaac Corporation ("the Corporation") is intended to promote honest and ethical conduct on the part of employees and others who act for and on behalf of the Corporation. This Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide employees, directors, agents, representatives (including consultants) and other persons acting on behalf of the Corporation. All such persons must conduct themselves accordingly and seek to avoid even the appearance of improper behavior. References to employees in this Code of Business Conduct and Ethics should be read to include employees, officers, directors, agents and other representatives acting on behalf of the Corporation.

If a law conflicts with a policy in this Code, you must comply with the law; however, if a local custom or policy conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts, you should ask your supervisor how to handle the situation. In some of the areas mentioned below (as indicated), the Corporation has adopted more detailed policies that speak to these issues. In these cases, one should be guided by the more specific policy.

Those who violate the standards in this Code will be subject to disciplinary action, including possible termination. *If you are in a situation which you believe may violate or lead to a violation of this Code, follow the guidelines described in Section 14 of this Code.*

Related Parties

Employees must be aware that the issues discussed below can arise both as the result of the employee's direct activity, and indirectly, through third persons (including individuals and business entities) related to or affiliated with an employee. Employees must not deal with or use these third persons on their behalf to take any action prohibited directly to employees hereunder.

1. Compliance with Laws, Rules and Regulations

Obeying the law, both in letter and in spirit, is the foundation on which this Corporation's ethical standards are built. All employees must respect and obey the laws of the cities, states and countries in which we operate. Although not all employees are expected to know the details of these laws, it is important to know enough to determine when to seek advice from supervisors, managers or other appropriate personnel.

The Corporation holds information and training sessions and makes materials available to promote compliance with laws, rules and regulations, including insider-trading laws.

2. Conflicts of Interest

A "conflict of interest" exists when a person's private interest interferes in any way with the interests of the Corporation. A conflict situation can arise when an employee, officer or director

takes actions or has interests that may make, or may appear to make, it difficult to perform his or her Corporation work objectively and effectively. Conflicts of interest may also arise when an employee, officer or director, or member of his or her family, receives improper personal benefits as a result of his or her position in the Corporation. Examples of such conflicts include: the Corporation's grant of loans to, or guarantees of obligations of, employees and their family members; and non-arm's length, covert vendor-purchaser relationships between the Corporation and a business in which an employee has an interest.

It is almost always a conflict of interest for a Corporation employee to work simultaneously for a competitor, customer or supplier. You are not allowed to work for a competitor as a consultant or board member. The best policy is to avoid any direct or indirect business connection with our customers, suppliers or competitors, except on our behalf.

Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with higher levels of management or the Corporation's Legal Department. Any employee, officer or director who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor, manager or other appropriate personnel or consult the procedures described in Section 14 of this Code.

3. Insider Trading

Employees who have access to confidential information are not permitted to use, share or disseminate that information for stock trading purposes or for any other purpose except the conduct of our business. All non-public information about the Corporation should be considered confidential information. To use non-public information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical but also illegal. If you have any questions, please consult the Corporation's Legal Department. You are also required to comply with the Corporation's more specific policy in this area.

4. Corporate Opportunities

Employees, officers and directors are prohibited from taking for themselves personally opportunities that are discovered through the use of corporate property, information or position unless that opportunity has been first presented to and waived by the Corporation, in a manner consistent with its general policies concerning delegation of authority. No employee may use corporate property, information, or position for improper personal gain, and no employee may compete with the Corporation directly or indirectly. Employees, officers and directors owe a duty to the Corporation to advance its legitimate interests when the opportunity to do so arises.

5. Competition and Fair Dealing

We seek to outperform our competition fairly and honestly. We seek competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is prohibited. Each employee should endeavor to respect the rights of and deal fairly with the Corporation's customers, suppliers, competitors and employees and anyone else with whom they have contact in the course of performing their job. No employee should take unfair advantage of

anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.

To maintain the Corporation's valuable reputation, compliance with our quality processes and safety requirements is essential. In the context of ethics, quality requires that our products and services be designed and manufactured to meet our obligations to customers. All inspection and testing documents must be handled in accordance with all applicable regulations.

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 customers. No gift or entertainment should ever be offered, given, provided or accepted by any Corporation employee, family member of an employee or agent unless it: (1) is not a cash gift (excepting minimal speaking gratuities or similar payments), (2) is consistent with customary business practices, (3) is not excessive in value, (4) cannot be construed as a bribe or payoff and (5) does not violate any laws or regulations. Please discuss with your supervisor any gifts or proposed gifts which may not be appropriate.

6. Discrimination and Harassment

The diversity of the Corporation's employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination or harassment of any kind. Examples include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances. You are also required to comply with the Corporation's more specific policy in this area.

7. Health and Safety

The Corporation strives to provide each employee with a safe and healthful work environment. Each employee has responsibility for maintaining a safe and healthy workplace for all employees by following safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions.

Violence and threatening behavior are not permitted. Employees should report to work in condition to perform their duties, free from the influence of illegal drugs or alcohol. The use of illegal drugs in the workplace will not be tolerated.

8. Record-Keeping

The Corporation requires honest and accurate recording and reporting of information in order to make responsible business decisions. For example, only the true and actual number of hours worked should be reported. Also, when work is being billed to a customer or charged to a project on a "time and material" basis, all accounting for these elements must be accurate.

Many employees regularly use business expense accounts, which must be documented and recorded accurately. If you are not sure whether a certain expense is legitimate, ask your supervisor or your controller. Rules and guidelines are available from the Accounting Department.

All of the Corporation's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect the Corporation's transactions and must conform both

to applicable legal requirements and to the Corporation's system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation and specifically authorized by the Corporation.

Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to e-mail, internal memos, and formal reports. Records should always be retained or destroyed according to the Corporation's record retention policies. In accordance with those policies, in the event of litigation or governmental investigation please consult the Corporation's Legal Department. You are also required to comply with the Corporation's more specific policy in this area.

9. Confidentiality

The Corporation has important confidential information of its own. It also receives, handles and stores considerable quantities of confidential information from our customers or potential customers concerning those customers or third parties with whom our customers deal. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Corporation or its customers, if disclosed. It also includes information that suppliers and customers have entrusted to us. Employees must maintain the confidentiality of confidential information entrusted to them by the Corporation or its customers, as required by applicable law and any contractual arrangements by which the Corporation is bound, except when disclosure is authorized by the Legal Department or required by law. The obligation to preserve confidential information continues even after employment ends. You are also required to comply with the Corporation's more specific policy in this area and any specific agreements on this subject between you and the Corporation.

In addition, you may not use any confidential information to participate in, inform or influence trades or bets on any online wagering or prediction market platforms. "Prediction market platforms" include online wagering platforms and platforms that allow participants to bet or otherwise engage in transactions based on the likelihood of specific outcomes. This restriction includes both your own activity and the activity of others; you must not disclose or tip confidential information to anyone who might use such information in connection with prediction market platforms.

10. Protection and Proper Use of Corporation Assets

All employees should endeavor to protect the Corporation's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Corporation's profitability. Any suspected incident of fraud or theft should be immediately reported for investigation. Corporation equipment should not be used for non-Corporation business, though incidental personal use may be permitted.

The obligation of employees to protect the Corporation's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate Corporation

policy and may violate the terms of agreements with the Corporation. It could also be illegal and result in civil or even criminal penalties.

11. Payments to Government Personnel

The U.S. Foreign Corrupt Practices Act prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country.

In addition, the U.S. government has a number of laws and regulations regarding business gratuities which may be accepted by U.S. government personnel. The promise, offer or delivery to an official or employee of the U.S. government of a gift, favor or other gratuity in violation of these rules would not only violate Corporation policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules. The Corporation's Legal Department can provide guidance to you in this area.

12. Waivers of the Code of Business Conduct and Ethics

Any waiver of this Code for executive officers or directors may be made only by the Board or a Board committee.

13. Reporting any Illegal or Unethical Behavior

Employees are encouraged to talk to supervisors, managers or other appropriate personnel about observed illegal or unethical behavior and when in doubt about the best course of action in a particular situation. It is the policy of the Corporation not to allow retaliation for reports of misconduct by others made in good faith by employees. Employees are expected to cooperate in internal investigations of misconduct.

14. Compliance Procedures

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- Make sure you have all the facts. In order to reach the right solutions, we must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- Clarify your responsibility and role. In most situations, there is shared responsibility. Are your colleagues informed? It may help to get others involved and discuss the problem.
- Discuss the problem with your supervisor. This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.

- Seek help from Corporation resources. In the rare case where it may not be appropriate to discuss an issue with your supervisor, or where you do not feel comfortable approaching your supervisor with your question, discuss it locally with your Human Resources consultant or the General Counsel. If you prefer to write, address your concerns to: General Counsel, Fair Isaac Corporation, 181 Metro Drive, Suite 600, San Jose, CA 95110. You may also submit a written report to the Audit Committee of the Board of Directors.
- You may report ethical violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected. The Corporation does not permit retaliation of any kind against employees for good faith reports of ethical violations. The Corporation has also designated an independent third party to receive complaints or expressions of concern and communicate them to the Corporation on an anonymous basis. That number is 800-219-2081. Additional dialing options for reaching this number when calling from outside the US and Canada can be found at the following link on the Corporation's Intranet: Dialing Instructions. You may also file a report online at the following link: https://fico.ethicspoint.com/. Further information about this service can be found on the Human Resources site on the Corporation's Intranet.
- Always ask first, act later: If you are unsure of what to do in any situation, seek guidance before you act.

It is the responsibility of a manager to assure that he/she and his/her subordinates comply with this policy.

The persons listed below who seek guidance with respect to the applicability of this policy, or who become aware of a violation of this policy, shall communicate or report as indicated:

Person Seeking Guidance or Reporting Violation	**Contact**
Employee other than the CEO or General Counsel	His/her supervisor with a copy to the General Counsel
Consultants or agents of the Corporation	His/her supervisor at the Corporation with a copy to the General Counsel
CEO and General Counsel	To the other with a copy to the Chair of the Audit Committee
Chair of the Audit Committee	To the CEO and General Counsel
Directors	To the CEO and General Counsel

Any violation of this policy, even if it is corrected immediately, shall be reported to the General Counsel and, where appropriate, the Audit Committee.

Implementation of this Code and the establishment of procedures designed to assure adherence to this Code are the responsibility of the General Counsel except for those duties specifically assigned to others herein.

15. Periodic Reports Required

Not later than October 31 of each year, each Director and each person who is a "Section 16" reporting person of the Corporation shall certify to the Corporation, by delivery of a certification in the form attached to the Corporation's General Counsel, that he/she (a) has read this policy, (b) has not directly or indirectly violated this policy, and (c) is not aware of any conduct which is or

may be a violation of this policy. The General Counsel annually shall report the results of this certification to the Board of Directors and to its Audit Committee. The form of Certification for Section 16 Persons shall be made available by the General Counsel.

16. Annual Review

This Code shall be reviewed annually by inside and outside corporate counsel, who shall advise if any changes are recommended. The General Counsel shall review this Code and any recommended changes annually with the Audit Committee of the Board of Directors. The legal administrative secretary shall maintain a record of all reviews, recommended changes and approvals.

AC Reviewed and Amended: October 20, 2026