

## **CODE OF ETHICS**

### **LOANDEPOT, INC.**

The Board of Directors (the "Board") of loanDepot, Inc. (together with its subsidiaries, the "Company") has adopted this Code of Ethics (the "Code") in order to deter wrongdoing and promote:

1. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
2. full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (the "SEC") and in other public communications made by the Company;
3. compliance with applicable governmental laws, rules and regulations;
4. the prompt internal reporting of violations of the Code to an appropriate person or persons identified in the Code; and
5. accountability for adherence to the Code.

All directors, officers and employees are required to be familiar with the Code, comply with its provisions and report any suspected violations as described below.

### **HONEST AND ETHICAL CONDUCT**

The Company's policy is to promote high standards of integrity by conducting its affairs honestly and ethically.

Each director, officer and employee must act with integrity and observe the highest ethical standards of business conduct in his or her dealings with the Company's customers, suppliers, partners, service providers, competitors, employees and anyone else with whom he or she has contact in the course of performing his or her job.

### **CONFLICTS OF INTEREST**

A conflict of interest occurs when an individual's private interest interferes, or even appears to interfere, with the interests of the Company as a whole. A conflict of interest can arise when an employee, officer or director takes actions or has interests that may make it difficult for that person to perform work for the Company objectively and effectively. Conflicts of interest also arise when an employee, officer or director (or a member of his or her family) receives improper personal benefits as a result of his or her position in the Company.

You have a responsibility to understand and avoid the types of situations that can give rise to conflicts of interest. While it is not possible to list every situation that could present a conflict of interest, there are certain areas where conflicts typically arise:

- *Financial interests.* A conflict can arise if you are responsible for purchasing or selection decisions regarding one of our customers or suppliers and you have a financial or personal interest in that customer or supplier or one of its competitors. Financial or personal interests may include loans to you or guarantees of your obligations.
- *Property interests.* A conflict can also arise if you own an interest in real property, leaseholds, patents or other property in which the Company might have an interest.
- *Third-party interests.* Acting as an agent for a third-party (customer, supplier, consultant, etc.) in transactions involving the Company also presents a conflict.
- *Family relationships.* Working with a family member can present real or perceived conflicts, especially if the functions you perform or the division of duties interferes with objective decision-making.
- *Outside activities.* A conflict can occur when you agree to serve as a director or in any other key role in a business, which is or seeks to be one of our customers, suppliers or competitors.

Loans by the Company to, or guarantees by the Company of, obligations of directors, officers, employees or their family members can be of special concern. Except as provided in the next sentence, loans by the Company to, or guarantees by the Company of obligations of, any director or executive officer or their family members are expressly prohibited. Notwithstanding the foregoing, this prohibition does not apply to mortgage loans that are made or serviced by the Company in the ordinary course of the Company's business; are of a type generally made available by the Company to the public; are originated and serviced, as applicable, on market terms or terms that are no more favorable than those offered by the Company to the general public for such mortgage loans; and are approved if and as required by the Company's Related Person Transaction Policy and Procedures.

Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest should be avoided unless specifically authorized as described in the paragraph below.

Persons other than directors and executive officers who have questions about a potential conflict of interest or who become aware of an actual or potential conflict should discuss the matter with, and seek a determination and prior authorization or approval from, their supervisor or manager, Human Resources, the Chief Risk Officer, or an attorney in the Legal department. They may not authorize or approve conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first providing the Chief Executive Officer, Chief Financial Officer, or Chief Legal Officer with a written description of the activity and seeking the Chief Executive Officer's, Chief Financial Officer's, or Chief Legal Officer's written approval.

Potential or actual conflicts may also be discussed directly with the Chief Executive Officer, Chief Financial Officer, or Chief Legal Officer.

Directors and executive officers must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Audit Committee. Directors and executive officers are also subject to the policies and procedures set forth in the Company's Related Person Transaction Policy and Procedures.

Notwithstanding the foregoing, these requirements will not apply to any activity or transaction that is subject to an exception included in our Certificate of Incorporation.

## **CORPORATE OPPORTUNITIES**

All directors, officers and employees owe a duty to the Company to advance its interests when the opportunity to do so arises. Directors, officers and employees are prohibited from taking for themselves personally opportunities that are discovered through the use of Company property, information or position. Directors, officers and employees may not use Company property, information or position for personal gain. In addition, no director, officer or employee may compete with the Company including, but not limited to, by being dually employed by the Company and a competitor. Notwithstanding the foregoing, these requirements will not apply to any activity or transaction that is subject to an exception included in our Certificate of Incorporation.

## **CONFIDENTIALITY**

Directors, officers and employees should maintain the confidentiality of information entrusted to them by the Company or by its customers, except when disclosure is authorized or legally mandated. Confidential information includes all non-public information that might be of use to the Company's competitors or harmful to the Company or its customers if disclosed.

## **FAIR DEALING**

Each director, officer and employee should endeavor to deal fairly with the Company's customers, suppliers, competitors and employees. No director, officer or employee should take unfair advantage of anyone through manipulation, concealment, abuse or privileged information, misrepresentation of facts or any other unfair dealing practice.

## **PROTECTION AND PROPER USE OF COMPANY ASSETS**

All directors, officers and employees should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability and are prohibited.

All Company assets should be used only for legitimate business purposes. Any suspected incident of fraud or theft should be reported for investigation immediately.

The obligation to protect Company assets includes the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, engineering and manufacturing ideas, designs, databases, records and any non-public financial data or reports. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

## **COMPLIANCE**

Directors, officers and employees should comply, both in letter and spirit, with all applicable laws, rules and regulations in the cities and states in which the Company operates.

Although not all directors, officers and employees are expected to know the details of all applicable laws, rules and regulations, it is important to know enough to determine when to seek advice from appropriate personnel. Questions about compliance should be addressed to the Legal Department.

Insider trading is unethical, illegal and a violation of the Company's Insider Trading Policy. Please refer to the Company's Insider Trading Policy for additional information.

## **DISCLOSURE**

The Company's periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules.

Each director, officer and employee who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records and accounts are accurately maintained. Each director, officer and employee must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and counsel.

Each director, officer and employee who is involved in the Company's disclosure process must:

1. be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting; and
2. take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.

## **REPORTING AND INVESTIGATION OF VIOLATIONS**

Any suspected illegal, fraudulent or unethical activity, or other violations of this Code of Ethics, should be reported immediately to your supervisor or manager, Human Resources, the Chief Risk Officer, or an attorney in the Legal Department. Alternatively, you may report to the Company's confidential ethics hotline, toll free, 24 hours a day, seven days a week, at 1-844-995-4898 or

<https://secure.ethicspoint.com/domain/media/en/gui/82303/index.html>. Reports to the hotline may be made on an anonymous basis, if desired.

The person receiving a report of an alleged prohibited action must promptly take all appropriate actions necessary to make sure that the matter is investigated and handled appropriately consistent with the Internal Allegations Policy . Any suspected illegal, fraudulent or unethical activity, or other violations of this Code of Ethics involving directors or executive officers must be reported to the Audit Committee.

All directors, officers and employees are expected to cooperate in any internal investigation of misconduct.

Notwithstanding anything in this Code to the contrary, nothing contained in this Code, nor in any agreement signed by you, prohibits you from voluntarily communicating with, reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to or participating in an investigation or hearing conducted by the Equal Employment Opportunity Commission, National Labor Relations Board, SEC or any other federal, state or local agency charged with the enforcement of any laws regarding possible violations of law or regulations or from recovering whistleblower awards from the SEC or any other agency.

## **PROHIBITION ON RETALIATION**

The Company does not tolerate acts of retaliation against any director, officer or employee who makes a good faith report of known or suspected acts of misconduct or other violations of this Code, and any such retaliation may be a violation of the Company's Internal Allegations Policy and other policies.

## **ENFORCEMENT**

The Company should ensure prompt and consistent action against violations of this Code.

If, after investigating a report of an alleged prohibited action by a director or executive officer, the Audit Committee determines that a violation of this Code has occurred, the Audit Committee will report such determination to the Board.

If, after investigating a report of an alleged prohibited action by any other person, the relevant supervisor or investigator determines that a violation of this Code has occurred, the supervisor or investigator will report such determination to the Chief Executive Officer, Chief Financial Officer, or Chief Legal Officer.

Upon receipt of a determination that there has been a violation of this Code, the Board, the Chief Executive Officer, Chief Financial Officer, or Chief Legal Officer will take such preventative or disciplinary action as it deems appropriate, including, but not limited to, reassignment, demotion, dismissal and, in the event of criminal conduct or other serious violations of the law, notification of appropriate governmental authorities.

## WAIVERS

Waivers of this Code are considered on a case-by-case basis and are generally discouraged. The Board (in the case of a director or executive officer) or the Chief Executive Officer, Chief Financial Officer, or Chief Legal Officer (in the case of any other person) may, in its discretion, waive any provision or violation of this Code. In addition, the Audit Committee may, in its discretion, exercise all authority granted to it in this Code, including to make determinations, give authorizations and approvals, give and receive reports, and waive any provision of this Code.

Any waiver for a director or an executive officer shall be disclosed as required by SEC and NYSE rules.

## RECORD OF REVISIONS

The table below provides a brief description of changes to this document made within the last twelve months and the revision dates. Unless otherwise noted, the revision date of this document is also the effective date of the change. All published revisions have been approved by the Company's Board of Directors.

Revision Date	Description of Changes
08/13/2025	Amended to make technical, administrative or other non-substantive amendments, including adding examples of conflicts of interest and cross references to related policies and to update reporting procedures.
01/29/2026	Amended to allow ordinary course mortgage loans to be made to directors, employees and their family members.