

Global Code of Conduct and Ethics

The quality of First Advantage's services and operations affects our reputation, productivity, profitability, and market position. Our objective is to create a work environment that allows and encourages all directors, officers and employees (collectively, the "Covered Persons") to perform their duties in an efficient, effective manner. For this reason, First Advantage has established a Global Code of Conduct and Ethics ("Code") that applies to all Covered Persons. Compliance with the provisions of the Code is a basic condition of directorship or employment at First Advantage. In the case of the Company's non-employee directors, compliance with this Code is subject to provisions of the Company's amended and restated certificate of incorporation, amended and restated bylaws and any stockholders' agreement with the Company.

If a Covered Person violates any part of the Code, he or she may be subject to corrective action, up to and including termination of directorship or employment. If a transaction is made that violates the Code, the Covered Person may be required to surrender any profit realized from it. The Covered Person has a right to appeal to the next level of management any ruling or decision rendered with respect to the Code.

If a Covered Person becomes aware of a violation of the Code, he or she must report it as provided under "***Create a Culture of Open and Honest Communication and Reporting of Illegal or Unethical Behavior.***" This information will remain confidential to the extent reasonably possible. It is important to note that no adverse action will be taken against any Covered Person who reports a violation or concern in good faith.

Company Vision

Deliver innovative solutions and insights that help our clients manage risk and hire the best talent.

Mission

We endeavor to *transform* our clients' process of identifying trustworthiness for employment, residential and vendor decisions. We endeavor to achieve this by creating *innovative, customer centric* solutions and a *simple and positive applicant experience*. We endeavor to have the solutions be delivered *globally, with excellence and high integrity, by engaged, collaborative and empowered professionals*.

I. Statement of Our Core Values

We at First Advantage pride ourselves on being a committed company with innovative, hard-working and accountable people. Our values describe how we work with and are judged by our clients, business partners, investors and each other.

- ***Do the Right Thing***

We strive to be open and honest, demonstrating trust and integrity in our work and our interactions – showing consistency between our actions and our words; taking responsibility for what we say and do, while being accountable for end results.

- ***Show Respect for the Individual***

The golden rule to treat others like you would like to be treated helps remind us to value and show dignity to each individual appreciating their unique backgrounds, talents and abilities. We all deserve to work in an environment where we are treated with dignity and respect. First Advantage is committed to creating

such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste

- ***Put the Client First***

An outside-in approach allowing our clients' needs to shape our solutions, strategies and success; we work to achieve the highest client satisfaction and to create an environment of mutual respect while driving market value.

- ***Innovate and Create***

Out-of-the-box thinking that helps create solutions that solve our client's problems and integrates us into their everyday work processes making us one of the best in the industry.

- ***Collaborate and Appreciate One Another***

We strive to create a positive, team-oriented atmosphere that recognizes a job well done and aligns rewards with performance.

II. Statement of Guidelines

Build Trust and Credibility

The success of our business is dependent on the trust and confidence we earn from our employees, officers and customers. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: will this build trust and credibility for First Advantage? Will it help create a working environment in which First Advantage can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering "yes" to those questions and by working every day to build our trust and credibility.

Equal Employment Employer

We all deserve to work in an environment where we are treated with dignity and respect. First Advantage is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

First Advantage is an equal employment employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. First Advantage affords equal employment opportunity to all qualified persons without regard to any impermissible criterion or circumstance. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

Create a Culture of Open and Honest Communication and Reporting of Illegal or Unethical Behavior

Any Covered Person at First Advantage who has a concern with, or is aware of, any illegal or unethical behavior, or who believes that an applicable law, regulation, rule or this Code has been

violated, including, but not limited to, with respect to First Advantage's accounting practices, employment practices, business practices, internal controls or auditing matters, must promptly report the matter to his or her manager, human resources representative, the Company's General Counsel, or the Audit Committee or anonymously by submitting a report to EthicsPoint by going to <https://fadv.ethicspoint.com> or by using the confidential Ethics Hotline at the toll-free number provided through the EthicsPoint website. Employees are encouraged, in the first instance, to address such issues with their managers or the HR manager, as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with his or her manager or HR, First Advantage's CEO does operate with an open-door policy and concerns can be directed in accordance with the above procedures.

At First Advantage everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when Covered Persons exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times. An employee who witnesses but is unable to stop suspected misconduct or discovers it after it has occurred, should report it immediately. Managers who receive reports are required to notify the General Counsel of the substance of the report.

Any other interested party may report any violations or suspected violations of this Code, the policies referenced herein or any other applicable legal or regulatory requirement or that concerns any accounting, internal accounting controls or auditing matters by submitting a report to EthicsPoint by going to <https://fadv.ethicspoint.com> or by using the confidential Ethics Hotline at the toll-free number provided through the EthicsPoint website. Any such report must be accompanied by the name of the person submitting the report.

First Advantage will investigate all reported instances of questionable or unethical behavior in a full and fair manner. This Code will be enforced on a uniform basis for everyone, regardless of position within First Advantage. In every instance where improper behavior is found to have occurred, the company will take appropriate action, including disciplinary action. Managers and supervisors of a disciplined Employee or Representative also may be subject to disciplinary action for failure to oversee properly a subordinate's conduct. We will not tolerate retaliation against employees who raise ethics concerns or concerns of violations of this code in good faith. Any Employee, regardless of the position such person holds, who retaliates against the individual who identifies or reports a violation or suspected violation or any individual who cooperates in an investigation of a reported violation will be subject to discipline and may be terminated.

Set Tone at the Top

Management and directors have the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers, officers and directors should not consider employees' or other Covered Persons' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At First Advantage, we want the ethics dialogue to become a natural part of daily work.

Uphold the Law

First Advantage's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or First Advantage policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Competition

We are dedicated to ethical, fair and vigorous competition. We will sell First Advantage products and services based on their merit, superior quality, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of goods or services for First Advantage or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular customers.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or Confidential Information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to First Advantage, its securities, business operations, plans, financial condition, results of operations or any development plan. We must be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

Environmental Responsibility

We recognize the need to protect the natural environment. Keeping our environment clean and unpolluted is a benefit to all. We must always follow best practices when disposing garbage and using chemical substances and we must comply with all applicable environmental laws and regulations.

III. Avoid Conflicts of Interest

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of First Advantage may conflict with our own personal or family interests because of the course of action that is best for us personally may not also be the best course of action for First Advantage. We owe a duty to First Advantage to advance its legitimate interests when the opportunity to do so arises. We must never use First Advantage property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with First Advantage.

Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with First Advantage.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any First Advantage transaction.
6. Placing company business with a firm owned or controlled by a First Advantage employee or his or her family.
7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all First Advantage employees.

Determining whether a conflict of interest exists is not always easy to do. Covered Persons with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

Gifts, Gratuities and Business Courtesies

First Advantage is committed to competing solely on a merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by First Advantage was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom First Advantage does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of First Advantage or customers, or would cause embarrassment or reflect negatively on First Advantage's reputation.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our directorship or employment are offered because of our positions at First Advantage. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at First Advantage to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that First Advantage maintains or may establish a business relationship with as long as acceptance does not create a conflict of interest or impartiality.

Covered Persons who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when First Advantage is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain First Advantage business.

Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Gifts

Covered Persons may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, Covered Persons may not accept compensation, honoraria or money of any amount from entities with whom First Advantage does or may do business. Tangible gifts (including gift cards or tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Employees and Officers with questions about accepting business courtesies should talk to their managers or the HR department. Directors with questions about accepting business courtesies should talk to the Audit Committee.

Offering Business Courtesies

Any Covered Person who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon First Advantage. A Covered Person may never use personal funds or resources to do something that cannot be done with First Advantage resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.

- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of First Advantage.

IV. Set Metrics and Report Results Accurately

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all Covered Persons, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Covered Persons should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping

We create, retain and dispose of our company records as part of our normal course of business in compliance with all First Advantage policies and guidelines, as well as all regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with First Advantage's and other applicable accounting principles.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of First Advantage books, records, processes or internal controls.

V. Promote Substance over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At First Advantage, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that First Advantage is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so.

Although First Advantage's guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, please follow the procedures set forth

under “Create a Culture of Open and Honest Communication and Reporting of Illegal or Unethical Behavior” within this Code of Conduct.

First Advantage takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

VI. Adhere to Confidentiality Guidelines

Confidential and Proprietary Information

Confidentiality is essential to our business. All Covered Persons must preserve the confidentiality of Confidential Information entrusted to them by the Company and by clients, other Covered Persons, vendors and others related to your business. Additionally, all employees sign a Confidential Information and Inventions Agreement (located on NAVEX Global PolicyTech) when they join First Advantage. Information learned regarding the Company’s clients and services performed during the course of employment at First Advantage shall be kept confidential and remain confidential.

For purposes of this Code, “Confidential Information” shall mean all non-public information about First Advantage and its clients and information protected by law or privilege and shall include: non-public proprietary information, trade secrets, intellectual property, customer client lists, information regarding product development, marketing plans, sales plans, certain operating policies or manuals which do not contain conditions relative to the terms of employment, business plans, financial records, or other non-public financial, commercial, business, or technical information relating to First Advantage, collectively referred to as Confidential Information, to any third party without the prior written consent of the First Advantage unless such Confidential Information has been previously disclosed by First Advantage or is in the public domain. Obligations under this Confidential Information and Inventions Agreement apply not only to written documents and data, but also to information that can be remembered by memory alone. Employees must exercise confidentiality during employment as well as after they leave First Advantage.

Under no circumstances should any Covered Person use Confidential Information that he/she learned in the course of his/her employment or relationship with First Advantage for personal gain, personal use or personal business. Disclosing Confidential Information to persons not entitled to such information and/or assisting others in gaining unauthorized access to First Advantage records or information are clear violations of this Code. The communication of false and malicious information about First Advantage, its clients, other Covered Persons or its employees is also a violation of this Code.

Notwithstanding the foregoing, you may communicate, cooperate or file a complaint with any U.S. federal, state or local governmental or law enforcement entity concerning possible violations of any legal or regulatory requirement, and may make disclosures to any governmental entity that are protected under the whistleblower provisions of any law or regulation, so long as (1) such communications and disclosures are consistent with applicable law and (2) the information disclosed was not obtained through a communication that was subject to the attorney-client privilege (unless disclosure of that information would otherwise be permitted by an attorney pursuant to the applicable federal law, attorney conduct rules or otherwise). Any agreement inconsistent with the above language between the Company and you is deemed invalid and will not be enforced by the Company.

Internal Operating Procedures and Planning

Covered Persons should be guarded when discussing confidential First Advantage business practices with outsiders. Any requests from outsiders for Confidential Information should be cleared with the supervisor/manager in the case of employees or officers or the General Counsel in the case of directors before it is released.

Occasionally, management holds meetings with Covered Persons in which material, non-public information concerning First Advantage's future plans is discussed. A Covered Person should never discuss Confidential Information or provide written copies of confidential written material concerning First Advantage's internal operating procedures or projections for the future with unauthorized persons outside First Advantage.

Clients

Some Covered Persons are entrusted with client financial status and needs. It is essential that all Covered Persons respect this trust. The names of clients or any non-public information pertaining to them must never be divulged to anyone outside First Advantage, not even to immediate family.

Confidentiality When Leaving First Advantage

Covered Persons who leave the employment of First Advantage must:

- Give First Advantage in good condition any and all property, materials, reports or records they or another person developed which are considered Confidential Information of First Advantage; and,
- Refrain from communicating, transmitting, or making known to any person or company any information relating to any materials or matters which are considered by First Advantage to be Confidential Information.

Use of Company Resources

First Advantage resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Covered Persons and those who represent First Advantage are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we must not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We must not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the First Advantage network and our fellow Covered Persons, First Advantage reserves the right to monitor or review all data and information contained on a Covered Person's company-issued computer or electronic device, the use of the Internet or First Advantage's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

Media Inquiries

First Advantage is a high-profile company in our community, and from time to time, Covered Persons may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media

inquiries to solutions@fadv.com. No one may issue a press release without first consulting with the VP of Marketing. Additional guidance is included in the Public Relations Policy located on NAVEX Global PolicyTech.

Administration of the Code

The Audit Committee oversees our Code and our Code is administered and monitored by our General Counsel.

From time to time, the Company may waive certain provisions of this Code. Any employee who believes that a waiver may be called for should discuss the matter with the General Counsel. Any waiver of any provision of this Code for executive officers or directors of the Company must be approved by the board of directors of the Company and will be promptly disclosed as required by law or stock exchange regulation. The Audit Committee will periodically assess this Code and approve any amendments.