CODE OF ETHICS
FOR SENIOR FINANCIAL OFFICERS

Adopted November 7, 2002
Last Reviewed and Approved September 28, 2026

Onity Group Inc. (“Onity” or “Company”) is committed to full and accurate financial disclosure in compliance with applicable laws, rules and regulations and to maintaining its books and records in accordance with applicable accounting policies, laws, rules and regulations. This Code of Ethics for Senior Financial Officers, applicable to the Company's Chief Executive Officer, Chief Financial Officer and Chief Accounting Officer (together, "Senior Financial Officers"), sets forth specific policies to guide the Company's Senior Financial Officers in the performance of their duties. As Senior Financial Officers, you perform a task that is critical to the Company. This Code is designed to assist you in that task.

Onity’s Code of Business Conduct and Ethics, which this Code of Ethics is intended to supplement, sets forth the fundamental principles and key policies and procedures that govern the conduct of all of us in our business. You are bound by the requirements and standards set forth in the Code of Business Conduct and Ethics, as well as those set forth in this Code of Ethics and other applicable policies and procedures. This Code of Ethics and the Code of Business Conduct and Ethics are collectively referred to as “Onity’s Codes of Ethics.”

Compliance with Rules and Regulations

Onity is committed to conducting our business in accordance with all applicable laws, rules and regulations and in accordance with the highest standards of business ethics. As a Senior Financial Officer, you must comply with applicable laws. In addition, you also have leadership responsibilities that include creating a culture of high ethical standards and commitment to compliance, maintaining a work environment that encourages employees to raise concerns and promptly addressing employee compliance concerns.

Conflicts of Interest

In order to maintain the highest degree of integrity in the conduct of Onity's business and your independent judgment, you must avoid any activity or personal interest that creates or appears to create a conflict between your interests and the interests of Onity. A conflict of interest occurs when your private interests interfere in any way, or even appear to interfere, with the interests of Onity as a whole. A conflict situation can arise when you take actions or have interests that make it difficult for you to perform your company work objectively and effectively.

You must respond to any conflict of interest situation in accordance with Onity’s Codes of Ethics and its Related Party Transactions Approval Policy.

Disclosures in Periodic Reports

As a public company, Onity is required to file various periodic reports with the Securities and Exchange Commission. It is Company policy to make full, fair, accurate, timely and understandable disclosure in compliance with all applicable laws and regulations in all required periodic reports and other public communications.

Compliance with the Code of Ethics

If you have questions about this Code of Ethics, you should seek guidance from the Chief Legal Officer. If you know of or suspect a violation of applicable laws or regulations or the Code of Ethics, you must immediately report that information to the Chief Legal Officer and the Chief Ethics Officer or the Risk and Compliance Committee of the Board of Directors. *No one will be subject to retaliation because of a good faith report of suspected misconduct.*

Waivers of the Code

The Company will waive application of the policies set forth in this Code of Ethics only when circumstances warrant granting a waiver and then only in conjunction with any appropriate monitoring of the particular situation. Changes in and waivers of this Code of Ethics may be made only by the Board of Directors or the Risk and Compliance Committee of the Board and will be disclosed as required under applicable law and regulations.

Violations

Violations of this Code may subject the individual to disciplinary action, which may include reprimand, reduction in salary, demotion or dismissal depending upon the seriousness of the offense as determined by the Risk and Compliance Committee of the Board.

No Rights Created

This Code is a statement of the fundamental principles and key policies and procedures that govern the Company's Senior Financial Officers in the conduct of Onity's business. It is not intended to and does not constitute an employment contract or assurance of continued employment, and does not create any rights in any employee, client, supplier, competitor, shareholder or any other person or entity.

ACKNOWLEDGMENT

I have received and read the Code of Ethics for Senior Financial Officers, and I understand its contents. I agree to comply fully with the standards, policies and procedures contained in the Code of Ethics and the Company's related policies and procedures. I understand that I have an obligation to report to the Chief Legal Officer and Chief Ethics Officer or the Risk and Compliance Committee of the Board of Directors any suspected violations of the Code of Ethics of which I become aware. I certify that, except as fully disclosed in accordance with the terms of this Code of Ethics, I have not engaged in any transactions or activities that would constitute an actual or apparent conflict with the interests of the Company. I further certify that, except as noted below, I am otherwise in full compliance with the Code of Ethics and any related policies and procedures:

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Printed Name

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Signature

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