



frontdoor<sup>®</sup>

# Code of Conduct

Message from

# Bill Cobb

## Chairman and CEO

We are committed to ethics, integrity and compliance at Frontdoor, and our Code of Conduct is our ultimate expression of this commitment. Guided by our purpose, mission and values, Frontdoor's Code of Conduct is the road map for our daily actions, including how we treat each other, as well as our members, contractors, investors and other key stakeholders. It is the North Star to the behaviors that drive our culture and provides clear expectations on how each of us is expected to conduct business and represent our company.

Please review this Code of Conduct carefully. As part of our compliance program, you are required to acknowledge that you have read and understood and are committed to following the letter and spirit of our Code of Conduct. We are all responsible for speaking up when something does not seem quite right or if we suspect unlawful or unethical conduct has occurred. You should always feel comfortable asking questions about the application of the Code — even anonymously if you prefer. You have my personal pledge that your concerns will be taken seriously and **always** without retaliation.

Great companies like ours never compromise ethics. We don't shrug our shoulders or look the other way in matters of honesty, integrity or compliance. Thank you for your commitment to our Code and for placing our values at the heart of everything you do: **Help others. Own it. Move forward. Explore.**



Bill Cobb  
Chairman and CEO



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# Commitment to our Code of Conduct

We are proud of our culture at Frontdoor. Every day, we recommit to the [purpose, mission and values](#) that guide us in our day-to-day actions and interactions. Our Code of Conduct provides clear expectations and a framework to ensure that we act ethically and responsibly, with integrity, and in accordance with all applicable laws and regulations. Adhering to our Code helps put our company in the best position to succeed in the marketplace and win the confidence and trust of our members, contractors, investors and other stakeholders.

## Our expectations

All employees, including directors and officers of Frontdoor, its subsidiaries and affiliates, must follow our Code of Conduct at all times. Suppliers, agents, business partners, contractors and consultants also are expected to uphold these principles in the work they perform on our behalf.

**While it's impossible to account for every situation and decision you'll encounter during your career at Frontdoor, everyone is expected to:**

- ✔ Use common sense and good judgment. If you are not sure, ask. There's no excuse for acting illegally or unethically.
- ✔ Follow our Code, all company policies and laws at all times — even if someone asks you to do otherwise.
- ✔ **Speak up** if something seems suspicious, inappropriate or unusual. If you're aware of something that may violate our Code, one of our policies or an applicable law, you're expected to say something.



**Please note:** Nothing in this Code should be construed as restricting or limiting your ability to file a complaint directly with any authorized government agency, testify truthfully in any public forum, exercise any protected right or comply with any applicable law or valid order of a court of competent jurisdiction.



## Consequences for violating our Code

Violations of our Code of Conduct can have severe consequences for Frontdoor employees, our members, investors and the company as a whole. In addition to damaging Frontdoor's reputation, jeopardizing our financial health and harming member and contractor trust, actions that violate our Code may also constitute a legal matter with serious implications for everyone involved. This may include civil and criminal liabilities and fines — even imprisonment. Failure to follow our Code may result in disciplinary action against those involved, up to and including termination.

## Leaders must set the example

Managers and others in leadership positions have additional responsibilities, including leading by example through their actions, as well as their words. The best company cultures begin with transparency and open, honest communication, where employees are comfortable asking questions, offering suggestions and voicing concerns. Frontdoor leaders should never ignore or excuse violations of our Code or the law. When concerns are raised, we expect our leaders to respond and, if necessary, act in a timely manner.

Setting the right example means talking openly about ethics in our business and letting team members know what's expected of them. Leaders should regularly remind employees about our Code, including how it is applied in common work scenarios, and where to find more information. In addition, leaders should always be open to discussing company policies and business practices. Frontdoor leaders must act with integrity and never pressure or direct any employee to manipulate or inaccurately represent any information or situation.



## How to speak up and voice concerns

You have a responsibility to speak up if something seems suspicious, inappropriate or unusual. If you're aware of something that may violate our Code, one of our policies or an applicable law, you're expected to say something. It does not matter if the behavior involves another employee, vendor, supplier, contractor, business partner or member – it must be reported.

If you have questions about our Code, a concern about possible unethical or unlawful conduct, or other workplace concerns, speaking to your manager is usually the best place to start. However, if your manager cannot resolve the matter, or if you feel more comfortable reporting concerns or suspected violations to someone else in management, you should feel free to do that instead. We encourage all employees with concerns to come forward without fear of retaliation.

You may always reach out to another leader in your department, such as the vice president or senior vice president responsible for your team, the People team or any executive officer, such as the Chief Legal Officer.

You also may contact the **Ethics Hotline at [frontdoor.ethicspoint.com](https://frontdoor.ethicspoint.com)** or by calling **844.479.8675**. (In India, the Hotline number is 000.800.919.0959.) The Ethics Hotline is operated by an independent, third-party company. It can be reached 24 hours a day, 365 days a year, and inquiries may be made anonymously, to the extent permitted by law. If you choose to report anonymously, please provide as much detailed information as possible and check back to see if we have posted any response or requests for additional information.



## Our review process and waivers

We take allegations of non-compliance with our Code of Conduct — as well as other company policies, applicable laws, and regulations — seriously and will promptly review and investigate all such reports. All employees (including directors and officers) must fully cooperate with any investigation. Reports will be treated confidentially to the extent possible and allowable by law, and you may voice concerns and communicate anonymously if you wish. Once an investigation has been completed, a response will be communicated to the person who submitted the concern, to the extent permitted by law, although we cannot always share the details related to the investigation or the outcome.

The Audit Committee of the Frontdoor Board of Directors has the authority to investigate reports of non-compliance with company policies regarding full and fair financial disclosure. The Ethics and Compliance team will maintain a log of all reports received regarding accounting, internal controls or auditing matters — tracking their receipt, investigation and resolution — and will provide periodic reports on such matters to the Audit Committee.

All exceptions to our Code must be approved in advance by the Chief Legal Officer. Any waiver of our Code for a director or executive officer may be granted only by the Audit Committee or the Board of Directors and will be promptly disclosed as required by applicable law, regulations or stock exchange listing standards.

## What should I do?

*I reported an ethics violation, but the person is still working here. Why weren't they fired?*

Due to privacy considerations, we cannot always share the details of the outcome of investigations. However, not every substantiated allegation results in termination. This does not mean your concern was not taken seriously. Other forms of action, including training and verbal or written warnings, may be used to correct violations of our Code.

## We prohibit retaliation.

We encourage employees with concerns to come forward without fear of retaliation. There's no room in our culture for retribution against anyone who asks questions or raises concerns. We will not take or allow retaliatory action against someone for reporting in good faith a concern or suspected violation, or for participating in an investigation. Managers are responsible for creating an environment where employees can raise concerns without fear of retaliation.

If you believe that you or another Frontdoor employee has experienced retaliation because of a good-faith report, it's important to **speak up** and voice your concerns so that appropriate action can be taken in a timely manner.





## Communication with governmental entities

Our Code of Conduct and our compliance reporting policies provide multiple avenues for directors, officers and employees to raise concerns of any possible legal or regulatory violations. For example, concerns can be raised anonymously to the extent permitted by law via the **Ethics Hotline at [frontdoor.ethicspoint.com](https://frontdoor.ethicspoint.com)** or by calling **844.479.8675**. (In India, the Hotline number is 000.800.919.0959.)

We do not prohibit directors, officers or employees from communicating, cooperating or filing a charge or complaint on possible violations of law or regulation with any U.S. federal, state or local governmental agency or regulatory authority, or from providing disclosures or documents to any governmental entity that are protected under the whistleblower provisions of any applicable law or regulation, provided that: (1) the communications and/or disclosures are consistent with applicable law and (2) the information subject to disclosure was not obtained through a communication that was subject to attorney-client privilege, unless such disclosure of that information would otherwise be permitted by an attorney pursuant to applicable federal law, state attorney conduct rules, or otherwise. Directors,

officers and employees do not need to give prior notice to (or get prior authorization from) us regarding any communication or disclosure described in the preceding sentence.

We also will not limit the right of any director, officer or employee to receive an award for providing information pursuant to the whistleblower provisions of any applicable law or regulation to any governmental entity. Any provisions of any agreement between us and any current or former director, officer or employee that are inconsistent with this section or that may limit the ability of any person to receive an award under the whistleblowing provisions of applicable law shall be deemed invalid and will not be enforced by us.



# Our Workplace

**We believe every employee has something valuable to contribute. Living our values, we're committed to creating a workplace that helps our employees reach their fullest potential. When we respect and learn from others' experiences and listen to multiple points of view, we create a genuine sense of belonging. Bolstered by support from peers and managers, we're able to bring our best selves to work — and have an opportunity to develop, grow and succeed.**

## **We embrace diversity and inclusion.**

Striving for workplace diversity means we focus on attracting, developing and engaging talented employees whose broad range of individual skills, backgrounds and experiences will benefit our members and our company. It also helps ensure equal employment and advancement opportunities for anyone employed or seeking employment with us.

Inclusion is about creating an environment where everyone feels welcomed, valued and respected in light of each person's differences. We encourage our employees to bring their diversity of thought, experiences, backgrounds and perspectives to help us reach our fullest potential. By doing so, we will instill greater mutual trust and create a work environment that's built on integrity and ethical behavior and supports our values.

When we embrace diversity and inclusion in our workforce, we not only create a more welcoming and productive workplace, we also gain greater insights, foster innovation and develop broader problem-solving skills. When we embrace different ideas and backgrounds, we can better relate to each other, as well as our stakeholders.



## What should I do?

***I was on a call with several of my teammates, and someone told an ethnic joke that made me uncomfortable. What should I do?***

Frontdoor does not tolerate discrimination, harassment or other inappropriate behavior by anyone in our workplace. If someone's comment or jokes are making you or a co-worker uncomfortable, you should [speak up](#) and voice your concerns immediately.

## We support a respectful work environment.

We are committed to a work environment that is respectful of all individuals. This means we do not discriminate against anyone based on the following characteristics:

- ✓ Race
- ✓ Color
- ✓ Religion
- ✓ Sex
- ✓ Age
- ✓ National origin
- ✓ Ancestry
- ✓ Pregnancy status
- ✓ Childbirth or medical condition related to pregnancy or childbirth
- ✓ Familial status
- ✓ Marital status
- ✓ Sexual orientation
- ✓ Gender identity or expression
- ✓ Protected veteran or military status
- ✓ Medical condition or disability
- ✓ Genetic information
- ✓ Citizenship status
- ✓ Any other status protected by applicable laws

We do not tolerate unwelcome and discriminatory behavior or harassment. Harassment is any unwelcome or offensive conduct based on a protected status that creates a hostile work environment. It is illegal, and we will not tolerate it in any form.

Harassment can take a variety of forms and can be visual, verbal, written, physical or sexual in nature. Examples include, but are not limited to:

- ✓ Threats or intimidation
- ✓ Stalking
- ✓ Jokes, slurs or gestures
- ✓ Sharing offensive material
- ✓ Coercion
- ✓ Unwelcome advances

If you experience, see or hear discriminatory, harassing or retaliating behavior, don't let it continue. You have a responsibility to [speak up](#) and report this behavior. If you have reservations or safety concerns, we encourage you to come forward and report your concerns; our Code outlines several ways you may do this, including anonymously. Retaliation against anyone for raising a concern in good faith will never be tolerated.



## What should I do?

***Another team member often teases me while on our team calls. She seems to think it is okay because she says, "Just kidding." This has happened a lot lately and it feels insulting to me. Now I dread attending our team calls. Am I overreacting if I say something?***

No, you are not. Workplace behavior that may unreasonably interfere with your work environment and/or work performance could be harassment and should not be tolerated. We need to know about it, and you should [speak up](#) and voice your concerns immediately.



### Learn more

*Equal Employment Opportunity Policy*

*Discrimination, Harassment and Retaliation Prevention Policy*

*Policy of Prevention, Prohibition & Redressal of Workplace Sexual Harassment for Frontdoor India Private Limited*



## We promote a healthy, safe workplace.

Whether it's in the office or while working remotely, we expect a safe and secure workplace for employees. Accordingly, we are responsible for following safety policies and protocols. Each of us has a responsibility to report any unsafe conditions immediately. This applies to physical risks, such as slips, trips, falls and ergonomics, as well as emotional well-being risks, such as patterns of harassment.



### ✔ **Drugs and Alcohol:**

Working while under the influence of alcohol or other substances, including illegal drugs and certain prescription medication, can have an adverse impact on work performance and affect the safety of others. At no time may you be under the influence of alcohol or other substances that may affect your ability to conduct your work in a reasonable and responsible manner. At company-approved events where alcohol is served, such as company-approved social or business events and client dinners, you must always conduct yourself in a professional and responsible manner and in accordance with Frontdoor policies.

### ✔ **Stay alert for signs of violence or threatening behavior:**

We won't tolerate threatening behavior against co-workers or anyone else. Carrying a weapon is strictly prohibited while in Frontdoor offices, while attending a work-related event or while conducting company business in a vendor's, supplier's or business partner's place of business. If you are threatened or feel unsafe for any reason while at work, notify your manager or the People team immediately. If you suspect immediate danger, you should remove yourself from the situation, if possible, and contact local emergency responders before reporting the incident through normal company channels.

### ✔ **Emotional Wellness:**

One of our core values — **Help People** — applies as much to how we support each other as it does to how we support our members. There are times when we all need some additional support in our work or personal lives. Our company is committed to providing a wide array of resources, including our Employee Assistance Program, to help employees navigate life's challenges, whether it's to manage stress, care for children and older parents or manage our finances.

### ✔ **Workplace Accident or Injury:**

Any workplace accident or injury should be reported immediately to your manager or the People team, regardless of the severity or whether it is in a remote or in-office workspace.



[Learn more](#)

Ways of Working Policy

[Learn more](#)

Employee Assistance Program

# Maintaining trust and integrity

Our daily decisions matter. Whether we're working with colleagues on a project or helping a member solve a repair issue in their home, living our values means we must always act with integrity and demonstrate the highest ethical behavior. It's not just **what** we do; it's **how** we do it. Avoiding conflicts of interest and protecting confidential information — these are some of the ways we deliver on our promises, strengthen our reputation and build trust with all of our stakeholders.

## We avoid personal conflicts of interest.

A conflict of interest is a situation in which our personal interests interfere with our ability to make objective decisions for the company. It's important to recognize and avoid certain personal relationships and outside interests that could create a conflict of interest — or the appearance of one.

Examples include:

- ✓ Family and close personal relationships with Frontdoor employees you regularly work closely with.
- ✓ Outside employment that may interfere with your ability to perform your work or otherwise act in the company's best interests. This includes outside work performed for a vendor, contractor, supplier, business partner or competitor of Frontdoor or any of its businesses.
- ✓ Business opportunities that may be of interest to Frontdoor that you learned about through your work at Frontdoor, or with organizations that may compete with or do business with us.
- ✓ Personal financial investments or a close personal relationship with someone who has a significant financial interest in any organization that does business or competes with Frontdoor.

**If a potential conflict of interest or the appearance of a conflict of interest arises, you must disclose the situation promptly to your manager and the Ethics and Compliance team.**



## What should I do?

***"My sister works for a company that we are considering to supply marketing services to Frontdoor. I work for the team in charge of selecting the vendor. What should I do?"***

If you have decision-making authority in the vendor selection process or with respect to your sister's company, a conflict of interest exists. Even if you don't have such authority, this relationship may create the appearance of a conflict of interest. You should disclose it to your manager immediately and contact the Ethics and Compliance team for further instruction. In addition, it would be best to immediately remove yourself from the decision-making process.



## What should I do?

*I am meeting with one of our top vendors next week. I would like to take him to lunch at a local restaurant and discuss the new services his company has to offer. Is this okay?*

Yes, usually this is okay as long as it does not violate any laws, takes place at a business-appropriate venue and is reasonable in cost. Refer to our Gift Policy and Global Travel and Entertainment Policy for more details or reach out to the Ethics and Compliance team for guidance.

### We give and accept business gifts, business courtesies and hospitality appropriately.

From time to time, it may be appropriate to give and accept business gifts, business courtesies and hospitality. However, our business decisions must be unbiased and based on the best interests of the company. Even the appearance of compromising our business integrity by accepting a gift can hurt our reputation and threaten our relationships with contractors, suppliers, investors and other stakeholders. To avoid a conflict of interest (whether actual or perceived), exercise caution when giving or accepting a business gift, business courtesy or hospitality. This is especially important if it could suggest that favorable treatment was sought by, received from or given to individuals or organizations that do business or seek to do business with Frontdoor. Giving and accepting gifts, business courtesies and hospitality must be moderately scaled and infrequent and should never even appear to

influence a vendor selection, supplier contract or future business. No gift, favor or form of business courtesy or hospitality may expose Frontdoor or employees to potential physical harm, legal risk or reputational risk, whether or not made public.

If you're unsure whether a gift or goodwill gesture meets the spirit and letter of our policy, seek advice from the Ethics and Compliance team. Additional prohibitions and information apply to gifts to government officials and their families; these are outlined in [Section 4, "We follow anti-bribery and anti-corruption laws."](#)



#### Learn more

[Gift Policy](#)  
[Global Travel and Entertainment Policy](#)  
[Anti-Corruption Policy](#)  
[Field Sales Guide](#)



## We follow insider trading laws and policies.

In our daily work at Frontdoor, many of us encounter or are exposed to confidential information (e.g., earnings information, new products, personnel decisions, significant transactions, etc.) that isn't available to the general public but could be information used to decide whether to buy or sell shares of Frontdoor stock or the stock of another company.

Material nonpublic information, or "inside information," is information about a company (including Frontdoor and companies that do business with us) obtained, in whole or in part, as a result of your employment with or relationship to Frontdoor that is not available to the public and would be important to an investor in deciding whether to purchase or sell such company's securities. This practice, known as "insider trading," is unethical and illegal. "Stock tipping," or providing inside information to others — including friends and family — so they might benefit financially, is also unethical and illegal and carries severe legal penalties. You should never make a stock trade if you suspect the information you possess is material and nonpublic. Instead, seek guidance from the Legal team.

Hedging or pledging Frontdoor stock also can create the appearance of insider trading or betting against the company's financial performance and can lead to conflicts of interest. Our Securities Trading Policy prohibits short sales, exchange-traded options, hedging and pledging.

The policy also imposes securities trading restrictions on our employees; in some cases, the policy applies to employees' family members and others living in their households.

For more information about insider trading laws and our company's prohibitions on insider trading, read the Securities Trading Policy. If you have questions about the policy or are unsure whether information you possess is material or nonpublic, reach out promptly to the Legal team for clarification.



## What should I do?

***My long-time friend Mia is married to Sanjay, who works at another company that just secured a major contract with Frontdoor. Mia says Sanjay is excited because the contract will earn him a big promotion — and probably send his company's stock price soaring. Although an official announcement of the transaction hasn't been made, can I purchase shares of Sanjay's company?***

No. This could be considered insider trading on the basis of obtaining material, nonpublic information, which would be a violation of federal securities laws and the company's Securities Trading Policy.

## We treat our members, suppliers and third parties with respect.

We strive to maintain the highest standards of ethics in all interactions with members, suppliers and other business partners. This includes treating members with courtesy and respect and addressing concerns in a timely fashion.

If you see or suspect any activity or behavior that could put our company or our members, suppliers or other business partners at risk, don't let it continue. You have a responsibility to [speak up](#) and report the behavior. Retaliation against anyone for raising a concern in good faith will never be tolerated.

## We deliver what we promise.

We represent Frontdoor honestly and accurately, with truthful sales, marketing and advertising practices. Failing to abide by these principles can lead to allegations of deceptive practices or consumer fraud — all of which can harm our members' and investors' trust.

### Meeting this high standard requires that we:

- ✔ Ensure all communication with members and the general public is accurate
- ✔ Avoid misleading language or claims in marketing, communications, advertisements and promotions
- ✔ Never misrepresent facts to gain a competitive edge in any market



# Lawful Business Practices

**We all have a duty to comply with the law. Laws can be complex and vary from one state or country to the next. This makes it extremely important to be familiar with the laws and regulations that apply to your specific job.**

## **We compete ethically and lawfully.**

While we are a passionate competitor, we compete ethically and follow all applicable antitrust laws to ensure free and fair competition in the marketplace. To live up to the letter and spirit of these laws, you must never discuss nor agree with a competitor to coordinate any of Frontdoor's conduct related to certain topics. These topics include:

- ✓ Strategic plans for entering into or competing in a particular market or territories or competing for particular customers
- ✓ Prices or price-related strategies (including marketing information)
- ✓ Business relationships with suppliers, vendors or other third parties
- ✓ Bidding for business or participation in a request for proposal (RFP)

Even the appearance of collusion can result in a lawsuit or government investigation, and price-fixing with a competitor or other forms of collusion is a criminal offense under U.S. federal antitrust laws. Accordingly, you must be diligent whenever you interact with our competitors. If a competitor brings up any of these topics in conversation, you must exit the conversation and immediately report the conversation to the Legal team.

For more information about antitrust laws and our company's prohibitions, read the Antitrust Policy. If you have questions about the policy, reach out to the Legal team.



**Learn more**  
Antitrust Policy







## What should I do?

*While at a client's sales meeting, Jasmine runs into Carter who works for a competitor. During a break, Carter conveys that his company is having some issues with a particular repair contractor, ABC Services. He says that his company is going to cease doing business with ABC Services and that he knows other companies are going to do the same. He recommends to Jasmine to stop working with ABC Services as well if her company is working with them. What should Jasmine do?*

Jasmine should exit the conversation and immediately report the conversation to the Legal team. Such conversations may violate antitrust laws and potentially carry severe consequences for both the individuals involved and our company.

### **We compete with integrity.**

Competing with integrity means gathering information about competitors in an ethical and legal manner. It's never appropriate to learn this information through theft, misrepresentation or deception, or to obtain, share or use confidential information of former employers. If you encounter confidential information about another company that you are not entitled to know, seek guidance from the Legal team before passing it along or acting upon the information.



**Learn more**  
Antitrust Policy

**frontdoor.**

## We follow anti-bribery and anti-corruption laws.

Conducting business with reputable vendors, suppliers and business partners and avoiding those who have a history of bribery or unethical conduct is one way to ensure Frontdoor protects its reputation and its members.

We comply with the anti-bribery and anti-corruption laws of the countries in which we do business, including the Foreign Corrupt Practices Act in the U.S. (FCPA). These laws apply to the actions of our company, our team members and third parties who work on our behalf anywhere in the world.

Regardless of local practices, competition or the nature of a gift, you or anyone who works on our behalf must avoid all activity that could constitute bribery or corruption or that could give the appearance of such. Never directly, or indirectly through a third party, make, offer to make, authorize, provide or accept anything of value — such as payments, gifts, hospitality or business courtesies — to any individuals, or at the request of any individual, for the purpose of influencing, inducing or rewarding any act, omission or decision to secure an improper advantage. Don't do it if it could be perceived as a bribe to obtain or retain business, favorable treatment or an improper benefit for or from Frontdoor. This is particularly the case with employees and officials (and their family members) of governments, state-owned or controlled entities, political parties and public international organizations, including universities, as well as candidates for political office and political parties.

Additionally, all payments, disbursements and other exchanges of currency to a member or third party must be for legitimate business purposes, properly authorized and properly recorded in the books and records of Frontdoor.

**If you have any questions or concerns related to anti-bribery or anti-corruption compliance, contact the Legal team.**



## What should I do?

***Because Frontdoor is a U.S.-based company, only employees of Frontdoor located in the U.S. are subject to the Foreign Corrupt Practices Act (FCPA), right?***

No. The FCPA applies to all Frontdoor employees whether they are located inside or outside of the U.S. If you have any questions, reach out to the Legal team.





### We follow anti-money laundering laws.

Money laundering involves disguising financial assets so they can be used without detection of the illegal activity that produced them. Through money laundering, a criminal seeks to “wash” the proceeds derived from criminal activity and make the funds appear to come from a legal source.

We are committed to complying with all anti-money laundering and anti-terrorism laws throughout the world. In support of that commitment, we must be in a position to internally detect and report suspicious third parties or transactions to the Finance and Legal teams. Compliance with anti-money laundering laws may require us to obtain certain information from a third party and verify the third party's identity. We must also be vigilant for any indication of money laundering activity and remain alert to signs of possible illegal activities. Red flags of money laundering may include but are not limited to:

- ✓ Requests for large cash payments or other unusual payment terms
- ✓ Structuring or breaking down payments into smaller amounts
- ✓ Fund transfers to or from countries or territories unrelated to the transaction
- ✓ Fund transfers to or from personal accounts or unrelated parties

### We comply with international and government trade laws.

Whenever we conduct international business or business with a governmental entity, we abide by all applicable laws, including the laws of international trade and trade sanctions.

Trade sanctions include economic and financial sanctions, as well as export controls of the United States and all other jurisdictions in which we conduct business. Similar to sanctions programs, each jurisdiction maintains export controls over certain items, and it is our policy to comply with export controls, wherever we conduct business.

Government contracts (with U.S. federal, state or local entities or with foreign governmental entities) are very complex and are subject to numerous policies, laws and regulations. When working on a government contract, you have a duty to know and comply with the exact contract requirements, including any required disclosures. Before bidding on, negotiating or making a sale to a governmental entity, or deviating from contract specifications, you must obtain prior approval from the Legal team.

## We maintain honest and accurate financial records.

Investors and other stakeholders rely on us to maintain accurate books and records and to submit full, fair, timely and understandable financial disclosures to the public markets, relevant government agencies and regulatory bodies. Every transaction contributes to an overall picture of Frontdoor's financial status, so it is crucial that our ledgers, reports, invoices and receipts are accurate. We can help ensure utmost integrity in these records by following Frontdoor policies and procedures, as well as the laws and regulations that govern our financial accounting and reporting.

As important as it is to enter only accurate and truthful information in our records, it's just as important that the records are properly maintained. We do this by following company guidelines, which address the length of time that certain types of records must be retained, as well as proper maintenance, disposal and destruction procedures.

If we learn that our records are necessary for an internal or external audit, investigation, government inquiry or litigation, we will notify relevant employees that they must preserve relevant materials. Never destroy, alter or attempt to conceal any records in your possession in response to such a notice. If you have any questions or concerns, please seek guidance from the Legal team.

Our Financial Code of Ethics describes additional obligations of our financial employees and business leaders.



### Learn more

- Record Retention Policy
- Financial Code of Ethics
- Global Travel and Entertainment Policy
- Purchasing Card Policy



## What should I do?

*You're out at lunch with your team and your manager asks you to pick up lunch on your P-card. "Don't worry," she says, "I'll approve the charges." Should you buy lunch?*

The highest-ranking employee at a business meal should always pay for the meal unless each attendee is paying separately. It is inappropriate for managers to either direct an employee to pay or approve expenses for a business meal expensed by the employee when the manager is also in attendance.



# Protecting Company Assets

Protecting company data and confidential information is one of the most important ways we show others we value their relationship and the trust they place in us. Being a good steward of confidential information and company resources helps ensure we're doing everything we can to preserve Frontdoor's reputation as a trusted brand that provides value to our investors.

## We commit to strong cybersecurity and data privacy measures.

Technology is an essential enabler in our business. It ensures a more efficient and productive work environment for our employees and a better service experience for our members.

Cybersecurity incidents and technology disruptions have the potential to not only impact our business, but our employees, members and others. This is why we continually invest in data privacy and security safeguards and actively manage our cybersecurity risk. But developing and implementing tools that help prevent cyber incidents is only part of it. You play a key role in being the first line of defense in protecting our systems and data from risk. For example, using strong and unique passwords and scrutinizing links and attachments in emails can help protect against security threats. You must be vigilant and comply with Frontdoor cybersecurity protocols and policies at all times, and complete all assigned security awareness training.

## We use company assets appropriately.

We provide computer hardware, such as desktops, laptops, handhelds and other equipment necessary to perform your job. These tools are Frontdoor property and should be maintained and used for business purposes. Occasional and reasonable use of company technology systems for legitimate personal purposes (such as an email to a family member) is permitted.

It is critical that we safeguard company assets against theft, damage and loss and ensure our use of company property complies with applicable laws and company policies. We reserve the right to monitor your use of company technology and the content of communications at any time, at our discretion. We also reserve the right to block access to inappropriate websites, as well as the transmission of inappropriate emails or files.



### Learn more

Privacy and Security Policy  
Acceptable Use Policy

## What should I do?

***My daughter has a research paper due for one of her classes. Is it okay for her to use my company computer when I'm not using it for work?***

No. You are the only person who is authorized to use your company-issued technology devices. Use by unauthorized users, such as a family member, may expose your computer to security threats such as malware and put our company at risk.



## We protect our company's information and intellectual property assets.

Information is one of our company's most valuable assets, and our intellectual property (IP) represents a huge investment in research and development. Failing to protect our confidential and proprietary information and IP can result in significant financial losses, damaged reputation and lost members.

We must strive to protect confidential information and operations from potential misuse, fraud, data breaches and other security threats. Our company's confidential and proprietary information includes information not generally known to the public.

### Some examples include:

- ✓ Pricing strategies
- ✓ Business plans and processes
- ✓ Marketing strategies
- ✓ Trade secrets
- ✓ Sensitive and unpublished company financial information
- ✓ Supplier and vendor information
- ✓ Potential acquisitions
- ✓ Technology
- ✓ Member, contractor and client lists

Our company brands, technology and proprietary software programs are IP assets that must be protected, often by using patents, copyrights and trademarks. Additionally, you must safeguard our IP and confidential information through the proper use of our network and computer systems and by keeping confidential and proprietary information secure. We seek to maintain appropriate access controls, to monitor and respond to cybersecurity threats and vulnerabilities and to disclose any breach in accordance with applicable laws and regulations. Your responsibility to protect all such information continues even after your employment with Frontdoor ends.

You will not be held liable under this Code, any agreement or any trade secret statute for any confidential disclosure of trade secrets to a government official or an attorney for purposes of reporting or investigating suspected violations of law or in a court filing under seal. See [Section 1. "Communication with governmental entities"](#) of this Code of Conduct for more information.



## We protect against financial fraud.

Financial fraud includes acts that intentionally deceive the victim by misrepresenting, concealing or omitting facts about promised goods, services, benefits or consequences for the purpose of monetary gain.

At all times, we must protect our information and operations from misuse, data breaches and other security threats, which can have serious negative consequences — including economic loss and business disruption — to our company, our employees, our members and other stakeholders.

In accordance with applicable law, we use a variety of tools and processes to monitor and assess the use of, and to help protect, our information systems and data. This provides an important barrier against criminals who would seek to harm us or our members for personal gain.

Additionally, each of us is expected to take common-sense measures to protect against security threats and be vigilant in following Frontdoor cybersecurity protocols.

## We protect each other's confidential information.

One way we show respect to our colleagues is by protecting their personal and private information at all times. Company systems and files contain a variety of sensitive personal information necessary to conduct everyday business. This includes health information, banking and government identification numbers, compensation and taxation data, family information and personal contact information. If your job requires access to this type of sensitive personal information, it's your responsibility to safeguard the information and only use it to the extent necessary to perform your duties.

Subject to the exceptions provided in [Section 1. "Communication with governmental entities"](#) of this Code of Conduct, we never disclose confidential information outside the company without explicit approval and appropriate confidential disclosure agreements. Even within Frontdoor, you should not share confidential information with anyone unless there is a strict business-related need to know. It's important to note that this responsibility does not restrict the rights of employees to discuss the terms and conditions of their employment with others.

### What should I do?

*My manager asked me to lead a project that involves team members from several departments. I need to prep the team, but the supporting documents she sent me contain some confidential information that isn't relevant to the project. What should I do?*

Confidential documents or information should never be shared with others unless their job specifically requires access. It's your responsibility to safeguard the information and only use it to the extent necessary to perform your duties. In this case, it would be wise to alert your manager that you received the information, then share only the required information with other team members.

## We safeguard third-party information from improper disclosure.

Our members trust us to protect their personal information. Internally and externally, we share such information only in strict compliance with the terms of our privacy and security policies. Before sharing member data with a third party, consult with the Legal team to ensure compliance with the applicable privacy and security policies.

Likewise, if you encounter a business partner's or a supplier's confidential information through your work at Frontdoor, you have a duty to safeguard this information from improper disclosure. Subject to the exceptions provided in [Section 1. "Communication with governmental entities"](#) of this Code of Conduct, we respect all contractual commitments, including non-disclosure agreements, that require us to protect third-party information.

We are equally committed to protecting the IP of our business partners and suppliers. We have a responsibility to use the IP belonging to others respectfully and only in accordance with our third-party agreements and applicable law. We do not install unlicensed software on company computers or access unapproved third-party services. Additionally, third-party materials must be used appropriately by advertising, marketing, IT and other functions. If you have any questions, please consult the Legal team.



### What should I do?

*You work in marketing and discover a graphic on another company's website that you really like. It would be a perfect fit for the new marketing project you are working on. If you change the color of the graphic to match our brand colors, is this okay to use?*

It's never okay to use someone else's intellectual property — whether it's a product design, graphic, technology or data — without the consent of the company or individual who owns it. If you are ever unsure, reach out to the Legal team for guidance.



## We are careful when speaking publicly about our company.

From time to time, our employees may be contacted by the media to provide comments or information on a range of topics. To ensure that public statements are presented in a consistent and factual manner, these requests must be directed to the Public Relations team. Only representatives from the Public Relations team or designated company spokespersons may speak externally on behalf of Frontdoor and its businesses.

In addition, it's particularly important to be aware of any confidential or material nonpublic information you may unknowingly intend to share at a professional conference or external meeting. If you're speaking at an external event, please refer to our Media Policy and reach out to the Public Relations team well in advance to ask for help preparing your remarks or presentation.

 [Learn more](#)  
Media Policy

## We are thoughtful when engaging in social media.

Many employees use social media to express their personal views and opinions, and Frontdoor recognizes that as a legitimate and legal right of free expression. However, you must remember when using social media that any references to your employment with Frontdoor or its brands may suggest an official company endorsement or position. For that reason, you must always make it clear that you are expressing a personal opinion and speaking only for yourself, and use good judgment. While posting to professional blogs and websites, social networking sites or chat rooms is entirely permissible, the message must not contain any company confidential or proprietary information. If you have any doubts or questions, reach out to the Public Relations team.

 [Learn more](#)  
Social Media Guidelines



## What should I do?

***I was approached by an outside group to make a presentation on business trends affecting Hispanic consumers. I think it's a great opportunity to talk about Frontdoor's capabilities in front of key decision-makers who could bring more business to the company in a strategic consumer demographic. Should I agree to deliver the presentation?***

While your intentions are certainly good, it's important to review the opportunity with the Public Relations team before agreeing to make the presentation, so they can help evaluate its potential impact, as well as any risks or other considerations. In addition, the Public Relations team can help you prepare for any questions you might get from the audience or address the media, if necessary.

# Corporate Responsibility

We are committed to strong business practices and appropriate disclosures that benefit our members, employees and the communities where we live and work. We've developed many initiatives to add value as a service provider, employer and global corporate citizen. We encourage you to participate in activities that benefit both the company and your community.

## We respect human rights and engage in fair employment practices.

We believe every person should be treated with dignity, and we have embedded respect for human rights and fair labor practices into our business. We also strive to be a positive presence in the communities where we work by following applicable labor laws, and never knowingly engage with suppliers or other third parties that violate labor or human rights laws. We encourage respect for human rights through compliance with policies and regulations designed to prevent any abuses of human rights such as human trafficking or slavery, forced labor and child labor.



 [Learn more](#)  
*Human Rights Policy*

## We support charitable activities.

As we live our purpose, mission and values, we strive to make a positive impact in the lives of others, as well as the communities where our employees live, work and serve. We do this in many ways, including supporting volunteer activities, charitable giving and more. All charitable donations on behalf of the company, as well as the associated use of our company name or other assets, must comply with the law and be approved through the Public Relations team.



 [Learn more](#)  
*Charitable Giving Policy*



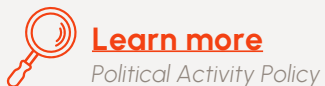
## We respect your right to engage in political activities outside work.

Our employees hold a broad range of political viewpoints, and many engage in political activities outside work. Your political affiliations or involvement will not impact your job status or chance for future advancement at our company. However, engagement in these activities must not conflict with our Code of Conduct or other applicable policies, or otherwise interfere with Frontdoor operations.

### For example:

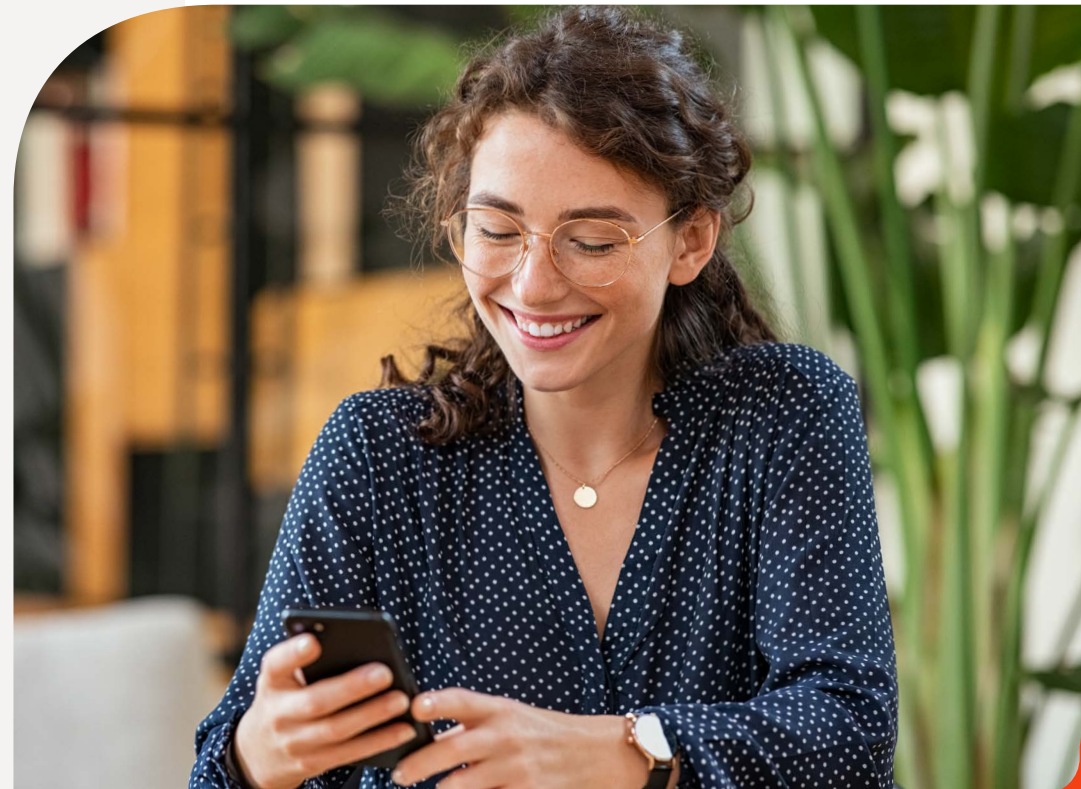
- ✔ You must never make a personal political contribution for the purpose of obtaining or retaining business, or securing some commercial advantage on behalf of Frontdoor.
- ✔ You must never use Frontdoor resources (including computers and telephones) for personal political activities.
- ✔ You must not engage in personal political activities during your working hours.

Using the Frontdoor name (or those of its brands) and Frontdoor resources for contributions (either cash or in-kind) to political organizations/activities is strictly prohibited without prior approval of the Legal team. The Legal team can provide guidance for the appropriate use of the Frontdoor name (or those of its brands) and Frontdoor resources.



## We respect our environment.

We are committed to sustainable operations and responsible use of resources in a way that protects our environment. Our policies and procedures are designed to ensure compliance with applicable federal, state and local environmental regulations. When work performed by Frontdoor — or our contractors — involves materials classified as hazardous, we mandate the proper and lawful handling, transportation and disposal of these materials. Contractors, suppliers and others who work with us must adhere to and follow applicable laws and regulations, and we hold our contractors accountable for the quality and safety of the services they provide.



# Open the frontdoor.®

## Our purpose:

Make life easier for every homeowner.

## Our mission:

Think like a homeowner, act like a Pro, help like a friend.

## Our values:

Help people.

Own it.

Move forward.

Explore.

**Thank you for reading our Code of Conduct** and for your commitment to act ethically and responsibly. Your actions shape our company and embody how we honor our values and our Code. As you face decisions at work, refer to our Code and our policies to guide you in making the right choices. If you have any questions or need additional guidance, please don't hesitate to ask. If you are aware of something that may violate our Code, one of our policies or an applicable law, [speak up](#).

By following our Code and living our core values, you help our company maintain a culture of integrity and trust. Together, we can grow and create a bright future for Frontdoor.