



POLITICAL ACTIVITY POLICY

I. PURPOSE

Frontdoor and its subsidiaries (collectively, “Frontdoor”, “we”, “us” or “our”) are guided by a simple purpose: make life easier for every homeowner. As Frontdoor is subject to broad-based and complex regulations at all levels of government, we believe Frontdoor may be able to advance this purpose through appropriate engagement with federal, state and local governments.

This Political Activity Policy (the “Policy”) is accordingly designed to ensure (i) that all political activities conducted by Frontdoor, or any third party acting on Frontdoor’s behalf, are undertaken in strict compliance with applicable federal, state and local laws of the United States, as well as (ii) that all political contributions made from Frontdoor funds comply with applicable prohibition and disclosure requirements. Employees should consult the Frontdoor Code of Conduct for additional guidance related to political activities in foreign jurisdictions.

II. POLITICAL ACTIVITY BY THE COMPANY

In order to achieve our goals, Frontdoor participates in the federal, state and local political process in well-considered and constructive ways designed to showcase our strong commitments to reasonable regulation and customer satisfaction. To that end, in accordance with our Code of Conduct, Frontdoor may from time to time make lawful and carefully considered political contributions to (i) associations, organizations that make independent expenditures, as defined under applicable law, including regulations of the Federal Election Commission, or (ii) political action committees (“PACs”) that align with Frontdoor’s objectives. Such contributions are intended to advance the interests of Frontdoor, our stockholders, customers and employees and are not to be influenced by the personal political views of any Frontdoor director, officer or employee. All political contributions require the approval of the Frontdoor Board of Directors (the “Board”) or the Nominating and Corporate Governance Committee of the Board (the “Committee”) pursuant to our Commitment Authority Policy.

Frontdoor recognizes that political contributions and activity are heavily regulated and subject to certain disclosure requirements and prohibitions dependent on the nature and jurisdiction of the recipient. Frontdoor’s Chief Legal Officer is responsible for overseeing all corporate political activity and for ensuring compliance with election and other applicable laws and regulations. Accordingly, all political activity by or on behalf of Frontdoor must be approved in advance by the Frontdoor Chief Legal Officer. Except as permitted by law, Frontdoor (a) does not contribute company funds to candidates for federal, state or local office, or to national, state or local party committees (including for use as expenditures coordinated with any candidate), and (b) does not make independent expenditures, in each case as such terms are defined under applicable law, including regulations of the Federal Election Commission.

Like many companies, Frontdoor belongs to certain U.S. trade and industry associations, to which Frontdoor pays annual membership dues. Frontdoor expects that the industry and trade associations to which the Company belongs do not use Frontdoor's funds for unlawful independent campaign expenditures or unlawful contributions to any federal, state or local candidate, party committee or political organization. Additionally, some of these trade and industry associations may operate PACs that accept individual contributions. Frontdoor does not currently contribute to any PACs operated by trade and industry associations. Frontdoor may, however, consider making such contributions in the future, provided that decision must be specifically approved by the Chief Legal Officer and the Board or the Committee, as appropriate. Furthermore, unless specifically approved by the Chief Legal Officer and the Board or the Committee, as appropriate, Frontdoor shall not make any political contributions (or contributions intended to be political contributions), directly or indirectly, through organizations which are registered under Sections 501(c)(4), 501(c)(5) or 501(c)(6) of the Internal Revenue Code.

III. POLITICAL ACTIVITIES BY DIRECTORS, OFFICERS & EMPLOYEES

We greatly respect the right of our directors, officers and employees to fully participate in democratic and political activities to the extent that they wish to do so—during their own personal time and in their individual capacities. Personal participation by Frontdoor directors, officers and employees in political activities may include, among other things, volunteer activities, campaign efforts and monetary or in-kind contributions. For purposes of clarity, any such personal political activities and contributions do not imply Frontdoor's endorsement of or participation in such activities. No director, officer or employee may suggest or imply that Frontdoor supports or is involved with his or her political activities, and under no circumstances may any director, officer or employee conduct such activities on Frontdoor time or premises. Employees also may not use Frontdoor resources in furtherance of personal political activities, including, but not limited to, office space, computers, printers or telephones. Under no circumstances may any personal political contribution come from Frontdoor funds or be reimbursed by Frontdoor.

IV. LOBBYIST ENGAGEMENT

We may engage federal and state lobbyists, lobbying firms and political advisors as needed to assist Frontdoor with addressing issues that arise in the context of proposed or impending action by federal, state or local government, as well as by any regulatory bodies. Such activities are ordinarily carried out by industry groups on the Company's behalf and on behalf of the industry as a whole. However, in some cases Frontdoor may deem it necessary to directly engage lobbyists, lobbying firms and political advisors to ensure that the specific and critical views of Frontdoor are properly and effectively communicated and/or represented. Frontdoor requires that lobbyists, lobbying firms and political advisors engaged by the Company be approved in advance by our Chief Legal Officer, conduct all activities in compliance with applicable lobbying and ethics laws, have no conflicts of interest, and represent Frontdoor with the utmost integrity. Frontdoor's Chief Legal Officer is responsible for overseeing lobbying engagements and their compliance with any federal, state or local disclosure requirements associated with the engagement of lobbyists and lobbying firms.

V. FRONTDOOR PAC

At present, we have not created a Frontdoor PAC (also known as a separate segregated fund) to accept political contributions from our employees, but Frontdoor reserves the right to do so in the future if we deem it beneficial to advance our mission and/or the interests of Frontdoor, our stockholders, customers and our employees. In the event Frontdoor creates a PAC (as specifically approved by the Chief Legal Officer and the Board or the Committee, as appropriate), we may invite employees to contribute to it, subject to all applicable prohibitions and disclosure requirements of the Federal Election Campaign Act and any other applicable laws. Under no circumstances will any employee be obligated to contribute to a PAC.

VI. OVERSIGHT AND COMPLIANCE

The Committee assists the Board in overseeing Frontdoor's political activities. The Frontdoor Chief Legal Officer is responsible for overseeing all Frontdoor political activities and their compliance with all applicable registration, reporting and disclosure requirements. On at least an annual basis, the Committee reviews and discusses Frontdoor's political activities, including political spending and lobbying activities, with Frontdoor's Chief Legal Officer. The Committee has jurisdiction over this policy and shall approve any proposed changes to it.

Any director, officer or employee who becomes aware of potential non-compliance with any law, regulation or rule related to Frontdoor's political activities, or the activities of third parties that Frontdoor has engaged, should immediately notify the Frontdoor Chief Legal Officer, contact the Frontdoor legal department, or contact the Ethics Hotline at frontdoor.ethicspoint.com or by calling 844.479.8675. In India, the Hotline number is 000.800.919.0959. Inquiries may be made anonymously.

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