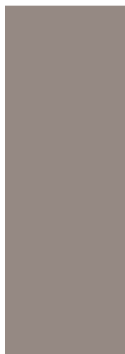
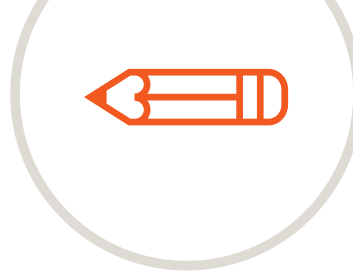




## CODE OF CONDUCT





## MESSAGE FROM REX TIBBENS, PRESIDENT AND CEO

As we transform the home services industry, we want to create a company that's as well known for the quality of how it operates as it is for the quality of its services and products. This begins with creating a culture of integrity, honesty, accountability, mutual trust and mutual respect. Each of us must be a leader and share in this stewardship. As we solve problems — big and small — and take the hassle out of home ownership, nothing is more important to us than maintaining the highest ethical standards in our relationships and actions.

You already know the best way we can serve our customers — and support each other — is by living our House Rules, the set of simple but critical leadership principles that serves as a framework for our working with customers, contractors, business partners, investors and each other. In conjunction with our House Rules, our Code of Conduct describes the policies, business practices and expectations that must guide our day-to-day interactions with these and other stakeholders.

These policies apply to everyone; all of us have a responsibility to follow them. We are also all responsible to do our part and to report concerns regarding inappropriate or unethical conduct that comes to our attention. As we move faster and think bigger, we'll undoubtedly encounter new business challenges that test "the way

we do things." But truly great companies never compromise integrity, cut corners or look the other way. When we maintain a work environment where all employees act ethically and respectfully, we build a stronger company that customers can always trust — and other companies will always admire.

While doing the right thing never gets old, company policies may change from time to time. You can always find the most up-to-date policies online on our intranet at [MyFrontdoorHome.com](https://myfrontdoorhome.com). If you have any questions or encounter a situation that's not specifically addressed in our Code of Conduct, your manager, the Human Resources team or the Ethics and Compliance team is available to help. You may also visit [frontdoor.ethicspoint.com](https://frontdoor.ethicspoint.com) or call the Ethics Helpline at **844.479.8675**.

Remember: We're all responsible for how we conduct ourselves with integrity in the marketplace, and for creating an ethical environment where we can deliver on our commitments with confidence.

**Rex Tibbens**  
President and CEO

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## SECTION 1:

# Commitment to our Code of Conduct

We're proud of the culture we're building at Frontdoor and of meeting the commitments we make to customers — and each other. We call these our **House Rules** — things like taking ownership and being accountable, building trust, doing great things every day and obsessing over our customers' problems.

While these principles guide us in our day-to-day actions, our Code of Conduct goes even further. Our Code provides clear expectations and a framework to ensure that we act ethically, with integrity and in accordance with applicable laws and regulations. Following our Code helps put our company in the best position to succeed in the marketplace and win the confidence of customers, contractors, investors and others.



### Expectations of everyone

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

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

- Use common sense and good judgment. There's no excuse for acting illegally or unethically.
- Follow our Code, all company policies and the law at all times — even if someone asks you to do otherwise.
- Say something. Our House Rules require everyone to be accountable. If you become aware of something that may violate our Code, one of our policies or applicable law, you are expected to speak up.

### Additional expectations of our leaders

Managers and others in positions of authority have additional responsibilities, including leading by example through actions, as well as words. Great company cultures begin with transparency and open, honest communication, where employees are comfortable asking questions and voicing concerns. Leaders should take time to remind their team members about our Code and discuss relevant Frontdoor policies and practices. Frontdoor managers never ignore or excuse violations of our Code or the law. And when concerns are raised, our leaders are expected to respond in a timely manner.

### Consequences for violating our Code

Frontdoor takes violations of our Code seriously. Code violations can have severe consequences for both Frontdoor and those involved. In addition to damaging the Frontdoor brand, actions that violate our Code may also violate the law and have an impact on both the individual involved and Frontdoor. These consequences could include civil and criminal liabilities. Failing to follow our Code also means Frontdoor may take disciplinary action against those involved, up to and including termination.



## Where to speak up or go for help

Your manager is usually the best place to start if you have questions about our Code, need to report possible misconduct or have other workplace concerns. In most cases, your manager can address the matter quickly and effectively. However, if you feel more comfortable discussing a work-related issue with someone else or if your manager cannot resolve the matter, feel free to reach out to other leaders in your department such as the vice president or senior vice president responsible for your team, your Human Resources manager or the Legal department. You may also contact the Ethics and Compliance team, visit [frontdoor.ethicspoint.com](https://frontdoor.ethicspoint.com) or call the Ethics Helpline at **844.479.8675**. This number can be reached 24 hours a day, and your inquiry may be made anonymously.

## Our review process and waivers

We take allegations of non-compliance with our Code of Conduct, other company policies, and applicable laws and regulations seriously and will promptly review and investigate all such allegations. All employees (including officers) and directors must fully cooperate with any investigation.

Frontdoor maintains the confidentiality of information and individuals related to reports of Code or other violations; however, disclosure may be necessary when required by law or when needed to properly examine or adequately respond to the matter. Employees may submit concerns and complaints, including with respect to accounting, internal accounting controls or auditing matters, anonymously through the Ethics Helpline or website. Once the investigation is completed, an outcome will be communicated to the person who placed the report.

The Audit Committee of the Board of Directors of Frontdoor has the authority to investigate reports of non-compliance with Frontdoor's policies regarding full and fair financial disclosure. The Legal department 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.

We may on occasion find it appropriate to authorize an exception to a provision of our Code. All exceptions must be approved in advance by the General Counsel. Any waiver of our Code for an executive officer or director may be granted only by the Board of Directors and will be promptly disclosed as required by applicable law, regulations or stock exchange listing standards.



### Safety from retaliation

Frontdoor encourages employees to come forward with concerns and does not tolerate retaliation against anyone who initiates or participates in the investigation process, asks questions or raises concerns in good faith. 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 have experienced retaliation as a result of a good faith report, it's important to speak up to your manager, the Human Resources department, the Legal department or by calling the Ethics Helpline at **844.479.8675** so that appropriate action can be taken.

### Communications with governmental entities

In addition to the above methods for reporting possible violations of any legal or regulatory requirement, Frontdoor employees 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) the communications and disclosures are consistent with applicable law and (2) the information disclosed was not protected by attorney-client privilege. Any agreement inconsistent with the above language between Frontdoor and any employee is deemed invalid, and we will not enforce it.





## SECTION 2: Our workplace

Our culture is centered on performance, accountability and respect, and our Code of Conduct guides our daily actions and interactions. We encourage our employees to use their diversity of thought, experiences, backgrounds and perspectives to instill trust and create a positive work environment that's built on ethics and integrity. When we embrace different ideas and backgrounds, we improve our thinking, expand our collective experiences, create context for innovation, and better relate to each other, as well as the customers we serve.

Our customers, business partners and diverse employees should see themselves represented in our workforce, in the communities we serve and the organizations we support.

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

Diversity and inclusion empowers us to achieve more together than we could individually, and fosters innovation and transformation. Not only should we represent the communities we serve, but bringing together talented people of diverse backgrounds, ages, races, genders, religions and life experiences helps us innovate and disrupt the status quo. In an inclusive environment, employees are comfortable bringing their whole self to work, and we all benefit from a variety of unique insights that enable us to be better at solving our customers' problems.

We value and support each other and work to ensure a diverse, welcoming and inclusive culture. Every employee has something to contribute. Embracing diversity means understanding and recognizing that each of us is unique and that we all benefit from the richness of different perspectives and points of view. Inclusion is about creating an environment where everyone feels welcome, valued and respected. It means that everyone enjoys a sense of belonging and level of support that allows them to do their best work.



**Several of my teammates and I are uncomfortable when our manager tells ethnic and nationality jokes. Is this all right? What should we do?**

Discrimination, harassment and intolerance have no place in Frontdoor or our society, and we each have a responsibility to eliminate them, one interaction, one person at a time. If you are comfortable doing so, you should tell your manager that his or her behavior makes you uncomfortable and you would like it to stop. Whether or not you speak with your manager directly, you should talk to the vice president or senior vice president in charge of your area or to the Human Resources department. You can also contact the Ethics Helpline. Frontdoor does not tolerate discrimination, harassment or other inappropriate behavior in our workplace.



### **We don't tolerate discrimination.**

Frontdoor is committed to creating and maintaining a positive and professional work environment for our employees, where each individual is treated with respect and dignity. We will not tolerate discrimination in any form that demonstrates hostility toward an individual because of their race, color, religion, sex (gender), 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, or any other status protected by the laws or regulations in the locations where we operate.

It is your responsibility to report any act of discrimination immediately. Retaliation against anyone for raising a concern in good faith will never be tolerated.

### **We promote a workplace free from harassment.**

Each individual deserves respect and a workplace that's free from harassment. Harassment is defined as any unwelcome conduct that creates a hostile work environment. Harassment includes harassment that is not sexual in nature (for example, offensive remarks about an individual's sex or gender), as well as making unwanted sexual advances and requests for sexual favors where:

- Submission to such conduct or communication is either explicitly or implicitly made a term or condition of an individual's employment; or
- Submission to or rejection of such conduct or communication by an individual is used as a basis for employment decisions affecting such individual; or
- Such conduct or communication has the purpose or effect of substantially or unreasonably interfering with an individual's work performance or creates and/or perpetuates an intimidating, hostile or offensive work environment.

Harassment can be physical, verbal, written or visual — such as through distasteful pictures or videos. Harassment is offensive and will not be tolerated in any form at Frontdoor.

Anyone who experiences or becomes aware of any act of harassment has a responsibility to report it immediately. Retaliation against anyone for raising a concern in good faith will never be tolerated.



**A fellow employee enjoys reading lewd and obscene emails at work. She only reads them when working late, but then often forwards them to friends. She assumes since she is doing this after normal working hours it's okay. Is this right?**

Frontdoor policy prohibits behavior that could create a hostile work environment and the use of our computer systems to transmit any offensive materials, regardless of the time of day.



## We promote a healthy, safe workplace.

Frontdoor is committed to providing a safe and healthy workplace. Accordingly, we are responsible for following safety policies and protocol. We all have a duty to report any unsafe conditions immediately so Frontdoor can take steps to correct the situation as soon as possible.

- **Personal Safety:** It is your responsibility to protect yourself, your fellow employees, and our customers from injuries and illnesses. It's important that all employees adhere to safe workplace practices.
- **Drug-Free and Alcohol-Free Workplace:** Being under the influence of alcohol, illegal drugs and controlled substances can have an adverse impact on your performance, as well as your safety and that of others. Except for lawful and responsible alcohol consumption during company-approved social or business events, such as client dinners or company-

sponsored events, employees may not consume or be under the influence of alcohol or possess, distribute or be under the influence of illegal drugs while engaging in Frontdoor business. At any company-approved event where alcohol is being served, employees must conduct themselves in a professional and responsible manner and in accordance with Frontdoor policies.

- **Workplace Violence:** Violent or threatening behavior of any kind — including carrying a weapon — is strictly prohibited while on Frontdoor premises or conducting Frontdoor business anywhere. If you feel threatened or unsafe while at work, notify your manager or Human Resources manager. If you or anyone else is in immediate danger, remove yourself from the situation, if possible, and call the local authorities before reporting the incident through normal company channels.



## SECTION 3:

# Maintaining trust and integrity

The choices we make every day matter to those we work with and our stockholders. As Frontdoor employees, we all have a duty to advance Frontdoor's interests. This includes acting with integrity and in compliance with strict business ethics. In particular, avoiding conflicts of interest, protecting confidential information and delivering on our promises, helps ensure that we maintain trust and high ethical standards throughout our business.

### **We avoid personal conflicts of interest.**

Certain personal relationships and outside interests could create a conflict of interest or the appearance of a conflict of interest. A conflict of interest is a situation where our personal interests interfere with our ability to make objective decisions for the company.

It's important to recognize and avoid conflicts of interest. Common areas of conflicts of interest include:

- Close personal relationships with other employees of Frontdoor;
- Outside employment that may interfere with your ability to perform your work or otherwise act in the best interests of Frontdoor, including outside work for a vendor, contractor, supplier, business partner or competitor of Frontdoor or any of its brands;
- 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 Frontdoor; and
- 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 conflict of interest arises, please disclose the situation to your manager or the Ethics and Compliance team.



**My brother's company is seeking to become a supplier to Frontdoor. Does this create a conflict of interest?**

If you have decision-making authority in the supplier selection process or with respect to your brother'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 report the potential situation to the Ethics and Compliance team and your manager and remove yourself from the decision-making process.

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

Our business decisions must be unbiased and made based on the best interests of the company. We do not want to give even the appearance of compromising the integrity of our business partners. To avoid a conflict of interest (actual or perceived), exercise caution when giving or receiving a business gift, business courtesy or hospitality, especially if it suggests that favorable treatment was sought by, received from or given to individuals or organizations that do business or seek to do business with Frondoor.

For that reason, giving and receiving gifts, business courtesies and hospitality must be moderately scaled, infrequent and should never even give the appearance of influencing the award of a particular piece of business. No gift, favor or form of business courtesy or hospitality received should expose Frondoor or individuals within Frondoor to physical harm or reputation risk if made public.

Legitimate gifts could include “de minimis,” or insignificant, tokens of goodwill, or expenditures designed to promote, demonstrate or explain Frondoor’s business.

Additional prohibitions and information about gifts to government officials and their families are outlined in Section 4: “We follow anti-bribery and anti-corruption laws.” When in doubt, seek advice from the Ethics and Compliance team.

**We do not engage in insider trading.**

Confidential information that you learn through Frondoor may only be used for Frondoor’s

business. Using material nonpublic information to decide whether to buy or sell a stock is known as “insider trading,” and is unethical and illegal. It is also illegal to provide inside information to (or “tip”) others, including friends and family, so they may benefit financially.

Material nonpublic information, or “inside information,” is information about a company (including Frondoor and companies that do business with us) that is not available to the public and would be important to an investor in deciding whether to purchase or sell the company’s securities. If you have any question about whether the information you possess is material or nonpublic, do not trade on that information. Instead, seek guidance from the Legal department.

Engaging in hedging or pledging of Frondoor stock can also create the appearance of insider trading or betting against the company, and can lead to conflicts of interest. Our Securities Trading Policy prohibits short sales, exchange-traded options, hedging and pledging.

Employees should read and be familiar with our Securities Trading Policy. The policy includes more guidance on insider trading laws and imposes securities trading restrictions for our employees, and in some cases their family members and others living in their households.

**We treat customers, suppliers and third parties with respect.**

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





## **We deliver what we promise.**

Our commitment to exceptional service means we deal fairly with our customers, suppliers and others at all times. We do this by representing Frontdoor honestly and accurately, with truthful sales, marketing and advertising practices. Failure to abide by these principles can lead to allegations of deceptive practices or consumer fraud — all of which negatively impact our customers' and investors' trust.

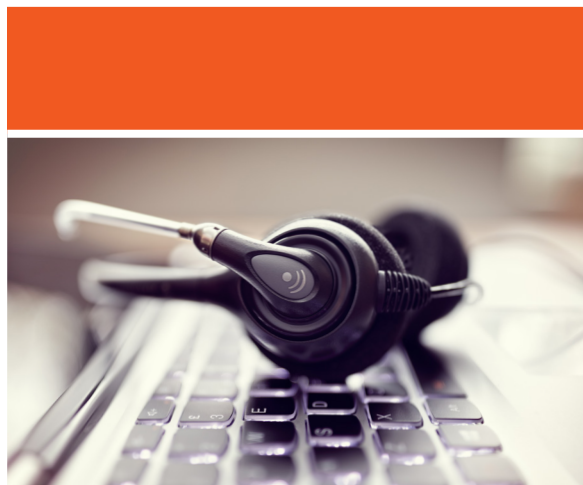
This means, in part, that we:

- Ensure communication with customers and the general public is accurate;
- Avoid misstatement of facts and misleading marketing, advertisements and promotions; and
- Never misrepresent facts to gain a competitive edge in any market.

## **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.

This responsibility does not restrict the rights of employees to discuss the terms and conditions of their employment with others. However, employees must not use, reveal or divulge any such information unless it is necessary for them to do so in the performance of their duties or except as otherwise allowed under this policy or by applicable law.



**You notice someone leaves a confidential employee file in a breakroom or conference room. What should you do?**

We are all responsible for protecting each other's privacy and for protecting confidential company information. Confidential records should always be safeguarded. You should bring the file to the Human Resources department or Legal department without looking at its content.



## SECTION 4: 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 all the more 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 will compete ethically and follow all applicable antitrust and competition laws. These laws are meant to preserve a free and fair marketplace. To live up to the letter and spirit of these laws, certain topics must never be discussed with competitors. These topics include:

- The division or allocation of markets, territories or customers;
- Prices or price-related strategies (including marketing information);
- Boycotting a supplier or other third party; and
- Matters that would influence the outcome of a bid or create an unfair advantage for one or more parties.

Keep in mind, even the appearance of collusion can result in a lawsuit or government investigation. Accordingly, you must be diligent whenever you interact with our competitors. If a competitor brings up any of these topics in conversation, you must stop the conversation and immediately report the conversation to the Legal department.



**Sarah attended a trade show. While there, she visited with her friend Devin, who works for a competitor. During a break, Devin mentioned that his company is working on a new pricing structure that will be introduced to the market soon. How should Sarah have responded?**

Sarah should have immediately stopped and told Devin that their conversation was not a proper business discussion. She then should have excused herself from the conversation and promptly reported the conversation to the Legal department. Such conversations may violate antitrust laws and potentially carry severe consequences for both the individuals involved and Frontdoor.



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

Competing with integrity also 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 department before passing it along or acting upon the information.

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

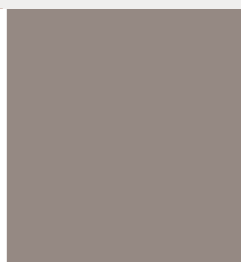
Frontdoor complies with the anti-bribery and anti-corruption laws of the countries in which we do business, including the U.S. Foreign Corrupt Practices Act (FCPA). These laws apply to the actions of our company, our team members and third parties who work on our behalf anywhere in the world.

Bribery and corruption are prohibited with respect to both public and private entities. Regardless of local practices, competitive intensity or the immaterial nature of a gift, you must avoid all activity that could constitute bribery or corruption or that could give the appearance of bribery or corruption.

Never, directly or indirectly through a third party, provide or accept anything of value, such as payments, gifts, hospitality or business courtesies, that 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, as well as candidates for political office and political parties.

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

Any questions or concerns related to anti-bribery and anti-corruption compliance should be directed to the Legal department.





## **We comply with laws of international trade and procedures for doing business with government customers.**

Whenever Frontdoor conducts international business, we abide by all applicable laws, including the laws of international trade and applicable trade sanctions, wherever we conduct such business.

Government contracts (with U.S. federal, state or local entities or with foreign government 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, negotiating or making any sales to a government entity, or deviating from contract specifications, you must obtain prior approval from the Legal department.

## **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 we are accurate in all of our ledgers, reports, invoices and receipts. You can 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 into 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 department.

Our Financial Code of Ethics describes additional obligations of our financial employees, business leaders and chief executive officer.



**You're out at lunch with your department and your manager asks you to pick up lunch on your PCard. "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 to approve expenses for a business meal expensed by the employee when the manager is also in attendance.



## SECTION 5: Protecting company assets

### **We use company assets appropriately.**

It's essential to access company assets appropriately, use them only for legitimate business purposes and safeguard company assets against theft, damage and loss. Frontdoor provides computer hardware, such as desktops, laptops, handhelds and other equipment necessary to perform your job. These tools are Frontdoor property and should be used in connection with your responsibilities as a Frontdoor employee. While occasional use of Frontdoor technology systems for legitimate personal purposes (such as an email to a family member) is permitted, there are other uses that are not. Frontdoor reserves the right to monitor your use of company technology to ensure it's used in connection with business purposes and in compliance with applicable laws and company policies.

Additionally, you're expected to use the Internet in an ethical manner, and not for recreational, unauthorized, illegal or inappropriate purposes, or to download any sexually suggestive or explicit material. Frontdoor reserves the right to block access to inappropriate websites, as well as the transmission of inappropriate emails or files. For more information, review our technology policies.



**What if my family and friends email me at work? Since these are personal messages can I expect them to remain private on my company computer?**

Although you may use your Frontdoor computer for incidental personal use, remember Frontdoor owns your computer and all information stored on it. As such, you should have no expectation of personal privacy. Frontdoor may review network activity on anything stored on your Frontdoor computer at any time.

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

Information is one of our company's most valuable assets. Corporate confidential and proprietary information includes information not generally known to the public, such as sensitive and unpublished financial information, customer lists, pricing strategies, supplier information, processes, business plans, potential acquisitions, marketing strategies and trade secrets. Company information also includes more publicly available information concerning our products and services. Your obligation to protect all such information continues even after your employment with Frontdoor ends.

The company's brands, technology and proprietary software programs are intellectual property (IP) assets that must be protected, often using patents, copyrights and trademarks. Confidential information and IP are also safeguarded through the proper use of our network and computer systems and by keeping confidential information secure. We seek to maintain appropriate access controls, to monitor and respond to cyber security threats and vulnerabilities and to disclose any breach in accordance with applicable laws and regulations.

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

Our customers 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 customer data with a third party, consult with the Legal department to ensure compliance with the applicable privacy and security policies.

Likewise, if you encounter our business partners' or suppliers' confidential information through the course of your work at Frontdoor, you have a duty to safeguard this information from improper disclosure. To this end, 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, customers and suppliers. We have a responsibility to use the IP belonging to others respectfully and only in accordance with our third-party agreements. 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 department.



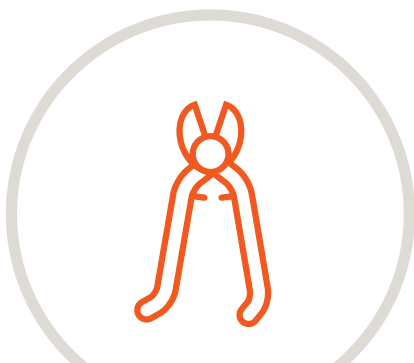


## We take care when speaking publicly about our company.

Our company's reputation is a valuable corporate asset that we safeguard when speaking publicly about the company. From time to time, a member of the media may contact Frontdoor employees for comment or reaction to a developing news story, service issue, legal matter or other scenario. Only designated spokespersons may speak on behalf of Frontdoor and its businesses, as outlined in our Media Policy. Funneling all media inquiries through a designated spokesperson helps ensure that any public statement is presented in a consistent manner.

Many employees use social media to express their views and opinions. It's a good idea to remember when using social media sites that any references to your employment with Frontdoor or its brands may suggest an official company position. For that reason, you should always make it clear that you are not speaking as a representative of Frontdoor or any of its brands. Also ensure when posting to blogs, social networking sites or chat rooms that the message does not contain any company confidential or proprietary information. For more information, please review the company's Social Media Guidelines.

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.



## SECTION 6: Citizenship

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

We believe every person should be treated with dignity and have embedded respect for human rights in our business. We also strive to be a positive presence in the communities where we work. This means that we follow applicable labor laws, and we do not knowingly engage with suppliers or other third parties who violate labor or human rights laws.

### **We support employees' engagements in political and charitable activities, and ensure that our company complies with applicable laws.**

We recognize the importance to our employees of volunteering their time and contributing personally to political or charitable activities, as well as the value of these personal activities to our communities. Any political or charitable activities by employees should be permissible under our Code and other applicable policies. Employees should never make a personal political contribution for the purpose of obtaining or retaining business, or securing some commercial advantage on behalf of Frontdoor, and should never use Frontdoor resources (including computers and telephones) for personal political activities. Employees also should not engage in personal political activities during their working hours on Frontdoor time. Your position (or chance for future advancement) at Frontdoor is not related in any way to your support of political or charitable causes.

Any engagements by our company in political or charitable activities must comply with all applicable laws. For guidance regarding the use of the Frontdoor name (or those of its brands) and Frontdoor resources for contributions to or involvement in political organizations or activities, please refer to the company's Political Activity Policy. Please refer to the Legal department for guidance regarding the use of the Frontdoor name (or those of its brands) and Frontdoor resources for contributions to or involvement in charitable organizations or activities.

### **We respect our environment.**

We are committed to operating in a way that is sustainable for our business and considers preservation of our environment. Our policies and procedures are designed to ensure compliance with applicable environmental federal, state and local regulations. If any Frontdoor work involves the handling or disposal of materials classified as hazardous, proper and lawful handling, transportation and disposal of hazardous materials is mandatory. We also insist that contractors, suppliers and others who work with us adhere to and follow applicable laws and regulations, and we hold our contractors accountable for the quality and safety of the services they provide.





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