



FINANCIAL CODE OF ETHICS

Frontdoor, Inc. (the “Company”) is committed to maintaining high standards related to our accounting and reporting processes and internal accounting controls. In support of this commitment, this Financial Code of Ethics sets forth responsibilities to ensure that our financial employees employ high ethical standards related to our accounting and reporting processes and internal accounting controls, in accordance with the Company’s Code of Conduct.

I. APPLICABILITY OF THE FINANCIAL CODE OF ETHICS

While the Company expects all financial employees to adhere to these principles and our Code of Conduct, our financial and business leaders play a key role in ensuring compliance with these principles. As such, individuals holding the following positions (collectively, the “Senior Financial Leaders”) are required to acknowledge expressly his or her responsibility to adhere to this Financial Code of Ethics as well as all applicable business conduct standards, policies and guidelines related to areas covered by this Financial Code of Ethics:

- Chief Executive Officer
- President
- Chief Financial Officer
- Chief Accounting Officer
- Controller
- Assistant Controller(s)
- Treasurer
- Other key financial, accounting or business employees as may be designated by the General Counsel from to time.

II. STANDARDS OF CONDUCT FOR SENIOR FINANCIAL LEADERS

Each Senior Financial Leader shall:

- a. Act with honesty and integrity in professional relationships, and promote and be an example of ethical behavior as a responsible partner among his or her peers and teams in the work environment;

- b. Avoid conflicts of interest. In doing so, he or she will ethically handle any actual or apparent conflict of interest in personal and professional relationships and will promptly disclose to the Company's General Counsel the nature of any transaction or relationship that reasonably could be expected to give rise to such a conflict of interest;
- c. Provide full, fair, accurate, timely and understandable financial disclosures in documents filed with, or submitted to, the Securities and Exchange Commission, any other government agency or self-regulatory organization, or used in other public communications;
- d. Comply with applicable laws, rules and regulations of federal, state, provincial and local governments, the Securities and Exchange Commission, the Nasdaq Global Select Market, and other applicable private and public regulatory agencies;
- e. Act in good faith, responsibly, with due care, competence and diligence, and without misstating, misrepresenting or omitting material facts or circumstances or allowing his or her independent judgment to be subordinated;
- f. Maintain the confidentiality of information acquired in the course of his or her work, except where disclosure is authorized and appropriate to carry out assigned responsibilities, or where otherwise legally obligated to disclose such information, and will not use confidential information acquired in the course of his or her work for personal advantage;
- g. Responsibly use, control and oversee assets and other resources employed or entrusted to his or her supervision;
- h. Maintain professional skills and share knowledge with peers and teams to carry out his or her responsibilities and obligations;
- i. Not improperly or fraudulently influence, coerce, manipulate, or mislead any authorized audit or interfere with any auditor engaged in the performance of an internal or independent audit of the Company's financial statements or accounting books and records; and
- j. Report questionable accounting, internal accounting control, auditing or fraud matters, or allegations of non-compliance with this Financial Code of Ethics promptly to management. If such issues raised have not been resolved appropriately, report my concerns to any member of the Company's Board of Directors, or by using the Ethics Helpline at (844) 479-8675 as provided in the Company's Code of Conduct.

III. ADMINISTRATION

This Financial Code of Ethics shall be administered in accordance with the principles and practices described in the Code of Conduct. Failure to adhere to this Financial Code of Ethics or to the Company's Code of Conduct, or to other business conduct standards, policies and guidelines related to areas covered by this Financial Code of Ethics, may result in disciplinary action, up to and including termination. Any waiver of this Financial Code of Ethics for the Chief Executive Officer, President, Chief Financial Officer, Chief Accounting Officer or Controller may be granted only by the Board of Directors or the Audit Committee of the Board of Directors and will be promptly disclosed as required by applicable law, regulations or stock exchange listing standard.

It is the Company's intention that this Financial Code of Ethics be its written code of ethics under Section 406 of the Sarbanes-Oxley Act of 2002, complying with the standards set forth in Securities and Exchange Commission Regulation S-K Item 406.

Last updated as of July 31, 2020