



## RIGHTMOVE PLC & SUBSIDIARY COMPANIES

(‘the Company’, or ‘Rightmove’)

### WHISTLEBLOWING POLICY

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**Summary** At Rightmove, we are committed to the highest standards of quality, honesty, openness and accountability. As an employee, you have an important role in achieving this goal.

Employees will usually be the first to know when someone in the organisation is doing something illegal or improper, but often feel worried about voicing their concerns. We have therefore designed a policy and procedure to report genuine concerns about suspected misconduct within the organisation, without fear of retaliation.

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**Scope** This Policy applies to all Rightmove directors, employees and contractors providing services to Rightmove.

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**Details** **What type of activity should be reported?**  
It is impossible to give an exhaustive list of the activities that constitute misconduct or malpractice but, broadly speaking, we would expect you to report any of the following activities:

- Financial malpractice or impropriety or fraud
- Theft of Company data
- Serious breach of Group policies
- Failure to comply with a legal obligation of the Company
- Actions which endanger the health and safety of employees, customers or the public, or more generally cause damage to the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Actions which are intended to conceal any of the above.

**Employees are encouraged to report concerns internally in the first instance either to their line manager, HR contact or, if those channels are the cause of the concern, to the Company Secretary.**

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This policy is primarily for concerns which, in the reasonable belief of the employee, are raised in the public interest. It is not designed to question management decisions taken by the Company, nor should it be used to address harassment or complaints or concerns in connection with an individual's employment contract, these should be dealt with under the Company's disciplinary and grievance procedures.

### Employee protection

The policy is designed to offer protection to Rightmove employees who disclose such concerns, based on their motive being:

- in the public interest,
- not to undermine the Company by actively choosing to act anonymously or to attract media attention, and
- not motivated by self-interest or malice.

You will not be at risk of losing your job or suffering any form of retribution or harassment from the Company or its employees if you report your concerns under this policy. As long as you reasonably believe your disclosures to be in the public interest, you will be protected by law even if you are ultimately mistaken in your belief.

If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. If you are able to raise your concerns in person confidentially, rather than leave an anonymous report, it will assist Rightmove with the prompt investigation and resolution of any misconduct or malpractice.

The policy is not a basis for anyone to raise a concern which, for whatever reason, they know is untrue. It is important to note that in an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about and Rightmove has a duty to protect not only those making allegations but also those about whom an allegation is made.

### How to raise a concern internally

If, for whatever reason, you feel you cannot speak with your manager about your concerns or if you think it has not been handled properly, then you should raise your concern by email, or in person, with the Company Secretary, Carolyn Pollard Her contact details are:

Carolyn Pollard, Company Secretary: [CompanySecretary@rightmove.co.uk](mailto:CompanySecretary@rightmove.co.uk)

### How to Raise a concern to the Financial Conduct Authority (FCA)

If your concern relates to regulated activities, it can be escalated directly to the FCA using the following methods:

- call the FCA dedicated team: 0207 066 9200
  - email: [whistle@fca.org.uk](mailto:whistle@fca.org.uk)
  - write to the FCA: Intelligence Department (Ref PIDA) Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN
  - use the FCA's online form to make a report:  
<https://www.fca.org.uk/firms/whistleblowing/where-make-report>
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See also the Escalation Framework Procedures.

### **Our external speak-up reporting channel**

While this policy aims to provide a process for reporting and investigating alleged wrongdoing in the workplace, we understand that employees may find it difficult to speak up using internal channels.

For this reason, we provide access to an external reporting hotline through Navex Global.

Navex Global is a completely independent organisation. Its employees are impartial and are trained to handle sensitive disclosures and encourage you to share your concerns in confidence.

Your call to Navex Global will not be traced or recorded. Where reports are submitted through online channels, device and location data will not be retained. All information (with the exception of your identity, if you wish to remain anonymous) will be passed by Navex Global to the Company Secretary or her nominee (if this person is the subject of the whistleblowing report, an alternative will be notified) who has been nominated by the Board to deal with whistleblowing matters.

### **How to submit a report via Navex Global**

- Call the hotline: 0800 890011  
Then dial: (833) 551-0639
- Visit the online portal: [rightmove.ethicspoint.com](https://rightmove.ethicspoint.com)

### **How we will handle the matter**

Once you have reported your concern, we will review it to assess what action, if any, should be taken. Depending on the nature of your concern, this may mean an internal inquiry or a more formal investigation. We will tell you who your point of contact will be and whether we will need further assistance from you. We may ask you how you think your concern should be best dealt with. If you have a personal interest in the matter, we ask that you tell us at the outset.

While we will try to give you as much feedback as possible, we may not be able to give you specific details, as this could infringe upon the privacy of another individual. Our response to any issue you raise under this procedure will be in writing and sent to your home address.

We will always try to handle a matter fairly and properly both in relation to the person raising the issue and any individual who may feel their behaviour and actions are called into question. Inevitably, this means that the outcome of the process carries the risk that not everyone involved will be satisfied with the outcome. However, irrespective of the outcome, other than the allegation being proven to be malicious, we will seek to protect the person raising the issue from any subsequent harassment or discrimination.

### **How the matter can be taken further**

This policy is intended to provide an avenue to raise concerns within Rightmove. We hope that those using this process will be satisfied with the way in which their concerns are treated and any investigations that may be carried out. However, if you are not satisfied and feel it right to raise your concerns outside the Group, the matter can be raised with:

- Protect, a whistleblowing charity, on 020 3117 2520 or [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)
  - a solicitor, or
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- another relevant regulatory or professional organisation.

Any individual has the right and responsibility to refer a concern to the Police if they suspect a criminal act.

In taking advice from sources outside Rightmove, you must ensure, so far as possible, that your concerns are raised without confidential information being divulged and we would expect you, other than in exceptional circumstances, to have exhausted all available internal routes first.

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**Compliance****Record keeping**

The Company Secretary keeps records of compliance with this and related policies. The information recorded by the Company Secretary would include any whistle-blowing reports or investigations.

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**Policy contacts****Contacts**

Please contact our Company Secretary or Director of People and Development if you have any questions or concerns about compliance with this policy.

Carolyn Pollard, Company Secretary:

[carolyn.pollard@rightmove.co.uk](mailto:carolyn.pollard@rightmove.co.uk)

Zoe Martin, Director of People & Development:

[zoe.martin@rightmove.co.uk](mailto:zoe.martin@rightmove.co.uk)

**Policy Owner**

Alison Dolan, Chief Financial Officer

[alison.dolan@rightmove.co.uk](mailto:alison.dolan@rightmove.co.uk)

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**Date approved:** Approved by the Audit Committee 1 November 2022

**Last approved:** 3 November 2021

**Next review:** November 2023

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