

**RIGHTMOVE PLC
(‘RIGHTMOVE’ OR THE ‘COMPANY’)
MODERN SLAVERY ACT TRANSPARENCY STATEMENT**

At Rightmove, the UK’s number one property portal, we seek to operate in an open, ethical manner in all our business dealings.

This statement is made on behalf of Rightmove plc, Rightmove Group Limited and its subsidiary companies (together the ‘Group’) in accordance with Section 54(1) of the Modern Slavery Act 2015 (the ‘Act’) in relation to the financial year ended 31 December 2019. A full list of the Group’s UK-incorporated companies can be found in the Appendix to this statement. There are no overseas-incorporated companies within the Group.

Over the past year we have continued to expand our due diligence in this important area and this statement provides further disclosure of our proactive measures to prevent slavery and human trafficking in our business and supply chain.

Our policy on slavery and human trafficking

Rightmove is committed to preventing slavery and human trafficking in its business and supply chains. We seek to uphold the highest standards of honesty and integrity in all our business dealings and relationships, and we have a zero-tolerance approach to the mistreatment of people in our employment and, wherever possible, employed in our supply chain.

Responsibility

The Board of Rightmove is collectively responsible for influencing the Group’s culture and compliance with the Act. The Finance Director has executive responsibility for all related governance matters, and is supported by the Finance and Company Secretarial teams, who carry out due diligence on material third party contracts and supplier arrangements from a financial and governance perspective. This statement has been reviewed and approved by the Board.

Our business

Rightmove.co.uk was established in 2000 and is the UK’s largest property portal; it is free to consumers and is where home movers turn to first to see virtually the whole UK property market in one place.

Rightmove floated on the London Stock Exchange in 2006 and since 2018 has been a member of the FTSE 100.

Rightmove’s business is almost entirely UK based: our customers are primarily UK estate agents, lettings agents and new homes developers advertising properties for sale and to rent in the UK. Our principal sources of revenue are the monthly subscription fees paid by our customers to advertise all their properties and supplemental fees paid for additional advertising products and packages. Annual revenue for the financial year ended 31 December 2019 was £289m.

On 30 September 2019 the Group acquired Van Mildert Landlord and Tenant Protection Limited (‘Van Mildert’), an FCA regulated business. Beyond being a good strategic fit, the Van Mildert team stood out for their entrepreneurial culture and for having many shared values with the core Rightmove business. Since acquisition Rightmove’s Audit Committee has carefully considered any emerging risks

and received regular progress updates in relation to actions to strengthen Van Mildert's internal controls and compliance framework, including in relation to modern slavery, as it transitions from being a small standalone entity to being part of the larger Rightmove Group.

We continue to grow a number of smaller adjacent businesses, including Van Mildert, focussed on helping tenants rent faster, advertising overseas and commercial properties and property-related data and valuation services. Overseas properties advertised on our platforms are aimed at our UK audience.

Our people

Our people are our most highly valued asset and critical to Rightmove's success and growth. We are determined to preserve the open and supportive culture which we have created together.

The Group employed 599 people as at 31 December 2019, including 4 contract workers, all of whom are based in the UK and over 99% employed directly by Group companies. We are committed to equal opportunities in all of Rightmove's employment policies and practices, and our employees are expected to treat other people with respect.

Rightmove base salaries have historically exceeded the Real Living Wage and post-acquisition we have raised base salaries for our employees at Van Mildert. With effect from January 2020, the Group has been accredited as a Living Wage employer. Furthermore, Rightmove has taken the necessary steps to ensure and verify that all contractors with employees operating on our premises on a regular basis are paid the Living Wage.

We are confident that there is no risk of slavery or human trafficking in the employment or engagement of our own employees, but we remain vigilant.

Our supply chain

Due to the nature of the Rightmove business there is naturally a low risk of modern slavery or human trafficking in either the business or the supply chain. Nevertheless, Rightmove is committed to ensuring that its suppliers adhere to the same high standards of the ethics it embraces.

Our operations are entirely domiciled in the UK and the majority of our top 20 suppliers by expenditure are also UK-domiciled: 19 are UK-domiciled with 1 supplier based in Ireland. We engage with suppliers who principally provide the following key products and services:

- **Technology:** outsourced data centre costs and estate agent data feed providers, IT infrastructure, hardware and software providers and cyber security threat mitigation services
- **Marketing:** online, television and print media advertising services, social media and market research services
- **People:** recruitment services, training and development services
- **Professional Services:** legal, accounting, taxation, auditing, banking and business consultancy services
- **Facilities:** maintenance, cleaning, property management

Policies

The Group complies with all relevant employment legislation and has a number of policies and statements that apply to Group employees, adhere to internationally recognised human rights principles and support our commitment to treat all our stakeholders fairly including:

- the Rightmove 'hows' and Van Mildert code of conduct;
- our Recruitment Policy;
- Health & Safety Policy;
- Anti-Bribery and Corruption Policy; and
- Whistleblowing Policy.

Rightmove's Whistleblowing Policy provides a clear escalation framework through which employees can raise concerns relating to the Group's business activities, including the crimes of slavery and human trafficking. The policy is overseen and monitored by the Audit Committee. Employees are able to report any concerns anonymously to an independent, outsourced third party service provider. If any issues relating to modern slavery or human trafficking were ever to be reported via this or any other channel, the circumstances would be investigated by a designated Group officer and reported to the Audit Committee, for onward submission for the Board.

If one of our suppliers or customers was proved to be in breach of the Act and incapable of remedying that breach, we would take appropriate action which may include giving notice to terminate their contract or membership.

Our supplier payment policy aims to settle all invoices within 30 days, with an average payment time of 18 days in 2019.

Supply chain due diligence

Rightmove operates a zero-tolerance approach to modern slavery and human trafficking. Our largest suppliers typically have mature processes to identify risks of modern slavery. As we seek to improve our approach to and identification of the risks of modern slavery, we will aim to ensure our smaller suppliers are equally as vigilant as we renew their contracts.

In 2019 we began the process to review and design an enhanced third party risk management framework to help us:

- Better understand and manage third party risk; and
- Ensure compliance with both regulatory expectations and requirements from industry/clients.

The review included the design of a simple risk questionnaire to onboard new suppliers which provides clear information about required follow-up actions in relation to the key risk areas identified for each new contract. The questionnaire, together with training and awareness for our procuring managers, will ensure a more robust and consistent approach to supplier due diligence.

We plan to roll out the new third party risk management framework to key suppliers during 2020 with the Audit Committee receiving regular updates of our progress.

Effectiveness

Our targets and KPIs for compliance with the Act are:

- Maintain Rightmove's accreditation as a Living Wage employer;
- Implement our new supplier due diligence process as outlined above; and
- Review our key supplier's Modern Slavery Act statements and, if necessary, request proof of compliance with the Act.

Training

Employees are briefed on all Group policies and statements relevant to the Act when they join Rightmove and periodically throughout their employment. Policies are maintained in our online employee portal (Bamboo HR) and updated for signing by employees on induction and subsequently when approved by the Board. We provide our policies and this statement to our customers and suppliers on request.

Rightmove holds several employee 'Town Hall' briefings throughout the year in order to provide information and training on numerous topics including our policies on Modern Slavery, Whistleblowing, Anti-Bribery and Corruption and Corporate Criminal Offences.

Board approval

This statement has been approved by the Rightmove Board and will be reviewed and updated annually.

For and on behalf of the Board

Robyn Perriss
Finance Director
28 February 2020

Appendix

List of Companies in the Rightmove Group

The companies listed below are all subsidiaries (direct or indirect) of Rightmove plc, and are all incorporated in the United Kingdom. The Rightmove Group does not have any subsidiary companies that are incorporated outside the United Kingdom.

- Rightmove Group Limited¹
- Rightmove Property Services Limited²
- Rightmove Rent Services Limited²
- Van Mildert Landlord and Tenant Protection Limited²

¹direct subsidiary of Rightmove plc

²direct subsidiary of Rightmove Group Limited

Top 20 direct suppliers by category and expenditure during 2019

Supplier category	Country
TV advertising	United Kingdom
Software, hardware & support	United Kingdom
Search engine optimisation	Ireland
London office rent	United Kingdom
Customer engagement technology services	United Kingdom
Threat detection systems	United Kingdom
Taxi advertising	United Kingdom
Recruitment services	United Kingdom
TV advertising design & production	United Kingdom
Database licensing and support	United Kingdom
Data centre hosting and support	United Kingdom
Employee healthcare benefits	United Kingdom
Print and online advertising	United Kingdom
Social media and news services	United Kingdom
Internal audit and professional services	United Kingdom
Business insight tools	United Kingdom
Milton Keynes office rent & services	United Kingdom
London office services	United Kingdom
Company car fleet management	United Kingdom
Recruitment services	United Kingdom