

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

Introduction

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

This statement is made on behalf of Rightmove plc, 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 2022. 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 improve our business to ensure that modern slavery and human trafficking do not occur anywhere in our business or amongst our suppliers 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 throughout its business and supply chains. We seek to uphold the highest standards of honesty, integrity and transparency in all our business dealings and relationships and have a zero-tolerance approach to the mistreatment of people, both in our employ and including, wherever possible, those 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 Chief Financial Officer has executive responsibility for all governance-related matters, and is supported by the Finance, Legal and Compliance 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 hunters turn to first and return to view 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 their properties and supplemental fees paid for additional advertising products and packages. Annual revenues for the financial year ended 31 December 2022 were £332.6m.

We continue to grow a number of smaller adjacent businesses, focused on helping tenants to rent more quickly, helping home buyers with mortgage information and mortgage referrals, advertising overseas and commercial properties and the provision of property-related data and valuation services. Rightmove Landlord and Tenant Services Limited (an FCA-regulated business) provides tenant referencing and related services. Rightmove Financial Services Limited (also an FCA-regulated business) provides mortgage referral services. Overseas properties advertised on our platforms are designed for our UK audience.

Our people

Our people are our most highly valued asset and are 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 687 people as of 31 December 2022, all of whom are based in the UK. Rightmove is an equal opportunities employer and is committed to giving fair and equal treatment in recruitment and employment matters to all employees and to job applicants. This is reflected in Rightmove's employment policies and practices, and our employees are expected to treat other people with dignity and respect.

When recruiting new employees, we ensure that our HR team and any external recruitment agencies are recruiting in line with our policies and values and that all employees have the right to work in the UK.

Living Wage Employer



Since January 2020, the Group has been accredited as a Living Wage employer and will ensure that all our employees are paid no lower than the living wage (both in London and nationwide), which is based on the cost of living and is higher than the government minimum wage. Rightmove has also 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 ensure that we engage on an ongoing basis with our employees and undertake a semi-annual 'Have Your Say' survey. The feedback from this survey would help to capture any concerns about unethical practices, should they ever arise. We are never complacent about the importance of acting on colleagues' feedback and are pleased to report that 87% of employees responding to the survey agreed that Rightmove is a 'great place to work'. Further information is published in the Sustainability Report in Rightmove's 2022 Annual Report.

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

Rightmove is a leading consumer digital services business. We work closely with our larger suppliers, principally in relation to the provision of technology, marketing, recruitment and professional services. Rightmove aims to build strong relationships with suppliers.

Our strategy is to select suppliers who meet our ethical standards and deliver excellent service, pay them promptly and work closely with them to ensure close alignment of interests. There is naturally a low risk of modern slavery or human trafficking in our own operations, but we are committed nonetheless to ensuring that our suppliers adhere to the same high ethical standards.

Our operations are entirely UK-domiciled and, of our top 20 suppliers (by expenditure) 18 are UK-domiciled, with two suppliers based in Ireland. In total, over 88% of our suppliers are UK-based. Where possible, we aim to build strong long-term relationships with our preferred suppliers and we engage frequently with suppliers before entering into agreements, both during the contractual period and on contract-renewal. Our suppliers principally provide the following key products and services:

- **Technology:** outsourced cloud services, 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 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';
- our Recruitment Policy;
- Health & Safety Policy;
- Financial Crime Policy (which incorporates the Anti-Bribery and Corruption Policy); and
- Whistleblowing Policy.

These policies are reviewed regularly and updates are clearly communicated to our employees to ensure that any changes are understood and observed.

Rightmove's Whistleblowing Policy, which is reviewed annually, 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 and third parties, such as suppliers, contractors and customers are able to report any concerns anonymously to an independent, outsourced third-party service provider. During 2022, Rightmove has taken the step of publishing its Whistleblowing line details on its corporate website <https://plc.rightmove.co.uk>, in line with best practice. 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 thoroughly investigated by a designated Group officer and reported to the Audit Committee, for onward submission to the Board.

For the year to 31 December 2022, no calls were received through the independent whistleblowing service or via any other route that related to modern slavery.

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.

Rightmove's Board-endorsed Payment Practices Reports, published every six months, includes our policy on the prompt payment of suppliers and is available from <https://www.gov.uk/check-when->

businesses-pay-invoices. Our supplier payment policy aims to settle all invoices within contractual terms (generally 30 days), with an average payment time of 20 days for the first half of 2022 and 19 days for the second half of 2022.

Supply chain due diligence

Rightmove operates a zero-tolerance approach to modern slavery and human trafficking and our largest suppliers typically have mature processes to identify risks of modern slavery. We are also working with our smaller suppliers to ensure they can meet our standards as we renew their contracts.

During 2022, as part of our identification and risk mitigation process, we have implemented an enhanced third-party risk management framework, which is explained in the Annual Report.

The framework will enable us to:

- Better understand and manage Rightmove's third party risks;
- Establish a centralised platform to manage and onboard suppliers across the Group;
- Categorise contracts;
- Where appropriate, semi-automate information requests and reviews; and
- Ensure compliance with both regulatory requirements and best practice.

The framework will also include additional training and awareness for our procuring managers, to ensure a more robust and consistent approach to supplier due diligence.

New suppliers are required to complete a questionnaire comprising a series of due diligence questions, to confirm that they comply with all applicable laws and regulations, including those relating to modern slavery and to confirm that there is no known modern slavery or human trafficking in their business. We expect all of our suppliers to respect human rights, both in their own workforce but also in their supply chains. In May 2022, we introduced a Supplier Code of Conduct, which is published on our corporate website <https://plc.rightmove.co.uk>. Suppliers are expected to comply with all applicable human rights and employment laws in the jurisdictions in which they work including the Modern Slavery Act and have robust means of ensuring that the sub-contractors in their supply chain also comply. During 2022, we asked all suppliers whose contracts were renewed to confirm that there was no modern slavery in their supply chain.

A Risk Committee is in place, supported by our Legal and Compliance team, to oversee operational risks and make further progress on developing and securing adherence to our supplier due diligence framework and anti-slavery approach.

Effectiveness

Our targets and KPIs for compliance with the Act are:

- Maintain Rightmove's accreditation as a Living Wage employer;
- Continue to roll out our supplier due diligence framework, outlined above; and
- Review our key suppliers' Modern Slavery Act statements and, if necessary, request proof of compliance with the Act.

Training

Our employees receive induction and training on the Rightmove 'Hows', which are at the heart of the Rightmove culture and which emphasise the need to do the right thing and share honestly, early and often.

Our 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 Bamboo, our online employee portal, 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 employee 'Town Hall' briefings throughout the year to provide business updates, information and training on numerous topics including our policies on Modern Slavery, Whistleblowing, Anti-Bribery and Corruption and Corporate Criminal Offences.

A Whistleblowing training module is completed by all employees annually.

Our future plans

We have identified areas for additional focus:

- Enhance our employee wellbeing policies and increase staff training for those employees whose roles may be exposed to modern slavery, starting with our HR, Facilities managers and Procurement managers.
- We will continue to roll out our supplier due diligence programme.

Board approval

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

For and on behalf of the Board

A handwritten signature in black ink, appearing to read 'Alison Dolan', with a horizontal line drawn underneath it.

Alison Dolan
Chief Financial Officer

28 February 2023

Appendix

List of Companies in the Rightmove Group

The companies listed below are subsidiaries (direct or indirect) of Rightmove plc and were 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 Financial Services Limited²
- Rightmove Landlord and Tenant Services Limited²

¹direct subsidiary of Rightmove plc

²direct subsidiary of Rightmove Group Limited

Top 20 direct suppliers by category and expenditure during 2022

Supplier Category	Country
TV Advertising	UK
London Office Rent	UK
Customer Engagement Technology Services	UK
Software development	UK
Car fleet Management	UK
Search Engine Optimisation and cloud services	IE
Data Licensing and Support	UK
Data Analytics	UK
Software Licensing	UK
TV Advertising design and production	UK
Recruitment Services	UK
Threat Detection	UK
Software and hardware support	UK
Search software	UK
Insurance	UK
Digital Performance Marketing	UK
Cloud services	USA
IT Infrastructure and Services	UK
Digital Consultancy	UK
Demand Side Platforms	UK

Suppliers by location

Supplier location	Number of suppliers	Percentage of Suppliers
Australia	2	0.51
Canada	2	0.51
Czech Republic	1	0.25
France	1	0.25
Germany	1	0.25
Ireland	11	2.78
Malta	1	0.25
Netherlands	3	0.76
Norway	1	0.25
Romania	1	0.25
South Africa	1	0.25
United Kingdom	349	88.13
USA	22	5.56