Modern Slavery Act Transparency Statement 2024

rightmove 🗘



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 2024. 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 seeks to uphold the highest standards of honesty, integrity and transparency in all our business dealings and relationships and has a zero-tolerance approach to the mistreatment of people, both in our employ and including, wherever possible, those employed in our supply chain. Rightmove is committed to preventing slavery, human trafficking, forced or compulsory labour and child labour throughout its business and supply chains.

Responsibility

The Board of Rightmove is collectively responsible for influencing the Group's culture and compliance with the Act. The Chief Executive Officer and the Chief Financial Officer have executive responsibility for all governance-related matters, and are 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 2024 were £390m.

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. HomeViews Platform Limited provides verified resident reviews of property developments, with a particular focus on the build to rent sector. 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 889 people as of 31 December 2024, 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 People 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 85% of employees responding to the survey agreed that Rightmove is a 'great place to work'. Further information is published in the ESG report in Rightmove's 2024 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) 16 are UK-domiciled, with three suppliers based in Ireland and one based in the United States of America. In total, over 86% 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, employee travel and accommodation;
- Professional Services: legal, accounting, taxation, auditing, banking and business consultancy services; and
- **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:

- Code of Conduct;
- Our values, the Rightmove 'Hows';
- Equality Policy;
- Human Rights Policy;
- Recruitment Policy;
- Procurement and Supplier Management Policy;
- Health and Safety Policy;
- Financial Crime Policy (which incorporates Anti-Bribery and Corruption); and
- 'Speak up'/Whistleblowing Policy and framework.

Our ethical framework also includes Ethnicity and Gender Pay Gap reporting and this Modern Slavery statement. These policies are reviewed regularly, and updates are clearly communicated to our employees to ensure that any changes are understood and observed.

Rightmove's 'Speak up'/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 can report any concerns anonymously to an independent, outsourced third-party service provider. Rightmove publishes its 'Speak up'/Whistleblowing line details on its corporate website <u>https://plc.rightmove.co.uk</u>, 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, which has been delegated authority to oversee whistleblowing reporting.

For the year 31 December 2024 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-whenbusinesses-pay-invoices. Our supplier payment policy aims to settle all invoices within contractual terms (generally 30 days), with an average payment time of 18 (2023: 19) days for the first half of 2024 and 19 (2023:19) days for the second half of 2024.

We provide relevant policies and this statement to our customers and suppliers on request.

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 2024, as part of our identification and risk mitigation process, we have continued the roll out of our enhanced third-party risk management framework, which is explained in the Annual Report.

The framework enables us to:

- Better understand and manage Rightmove's third party risks;
- Establish a centralised platform to manage and onboard suppliers across the Group; and
- Ensure compliance with both regulatory requirements and best practice.

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

New and existing 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 our suppliers to respect human rights, both in their own workforce but also in their supply chain. A Supplier Code of Conduct is in place, 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 2024, we asked all key 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:

- Investigate thoroughly any reports of modern slavery or human trafficking received by the Group;
- Maintain Rightmove's accreditation as a Living Wage employer;
- Continue to roll out our supplier due diligence framework, outlined above;
- Continue to review our supplier due diligence framework for effectiveness amongst our top suppliers; and
- Review our key suppliers' Modern Slavery Act statements and, if necessary, request proof of compliance with the Act.

Training

Our employees receive an induction and training on our values, 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. A Code of Conduct is in place and 'Speak up'/Whistleblowing and Financial Crime training modules are completed by employees annually. Employees access policies using an online portal.

Our future plans

We have identified areas for additional focus:

- Consider the introduction of modern slavery training for those employees whose roles may be exposed to modern slavery, starting with our senior 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

Ruaridh Hook Chief Financial Officer 25 February 2025

Appendices

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
- HomeViews Platform Limited³

¹direct subsidiary of Rightmove plc ²direct subsidiary of Rightmove Group Limited ³direct subsidiary of Rightmove Group Limited

Supplier	Location
TV Advertising	United Kingdom
TV Production	United Kingdom
Corp IT consumables (meeting room equipment refit)	United Kingdom
Monitoring RM websites & hardware	Ireland
Consultancy - corporate project	United Kingdom
Insurance	United Kingdom
London Office RENT charges	United Kingdom
Insurance	United Kingdom
Contractors -ProdDev (software development) and consultancy	United Kingdom
Consultancy - corporate project	United Kingdom
Car fleet Management	United Kingdom
Cloud services	Ireland
Consultants - New Billing system	United States
TV Production	United Kingdom
Contractors -ProdDev (software development) and consultancy	United Kingdom
Marketing Software - Braze	United Kingdom
London Office Service charges	United Kingdom
Health Insurance (employee benefits)	United Kingdom
Google Maps	United Kingdom
Telephone Lead Management	Ireland

Top 20 direct suppliers by expenditure in 2024

All suppliers by location

Supplier location	Number of suppliers	Percentage of suppliers
Australia	4	0.92%
Belgium	1	0.23%
Canada	2	0.46%
Cyprus	1	0.23%
Czechia	1	0.23%
Denmark	2	0.46%
France	2	0.46%
Germany	1	0.23%
Ireland	7	1.61%
Malta	0	0.00%
Netherlands	4	0.92%
Norway	0	0.00%
South Africa	1	0.23%
Sweden	1	0%
Switzerland	1	0%
Taiwan (Province of		
China)	1	0.23%
United Kingdom	376	86.64%
United States	29	6.68%

