

CODE OF CONDUCT

We are committed to making Rightmove (meaning Rightmove Group Limited, Rightmove Plc and Rightmove Landlord and Tenant Services Limited and any other group companies) a great place to work through an open, collaborative culture, based on the belief that we are all in it together. At the heart of everything we do are the Rightmove 'Hows' – the essential behaviours which reflect our culture. The 'Hows' are:

- Do the right thing for consumers and customers.
- Build great teams because Rightmove is people.
- Be curious and go out of your way to understand.
- Share honestly, early and often.
- Take responsibility and make things that matter happen.
- Make complex things as simple as possible.
- Drive improvement, we can always be better.
- Dare to do, be bold - don't be afraid of mistakes you can learn from.
- Be approachable and appreciate what others do.
- Enjoy the journey, be part of it.

The purpose of this Code of Conduct is to provide guidance on how our members of staff should conduct themselves when carrying out Rightmove's business.

This policy applies to all employees, officers, consultants, self-employed contractors, casual workers, agency workers, volunteers and interns. This policy does not form part of any contract of employment or contract to provide services, and we may update it at any time. In the event that a term of this policy conflicts with any term in your contract of employment or contract to provide services, the terms of your contract will apply.

1. THE WORKPLACE ENVIRONMENT

- 1.1 Rightmove aims to be a supportive and inclusive employer with a diverse workforce, free from all forms of discrimination, harassment, sexual harassment, bullying or victimisation. All members of staff are required to adhere to Rightmove's Equality policy and Anti-harassment and Bullying policy.
- 1.2 It is vital that the workplace environment is safe for all of our colleagues and visitors. Therefore, all members of staff are required to take reasonable care for the health and safety of themselves and others and co-operate with Rightmove's instructions in relation to health and safety, including as set out in the Health and Safety policy.

- 1.3 Alcohol and drugs can lead to reduced levels of attendance, reduced efficiency and performance, impaired judgement and decision making and increased health and safety risks for you and other people. Irresponsible behaviour or the commission of offences resulting from the use of alcohol or drugs may damage our reputation and, as a result, our business. Members of staff are expected to arrive at and attend work fit to carry out their duties safely without any limitations due to the use or after effects of alcohol or drugs, including controlled drugs, psychoactive substances, or the misuse of prescribed or over-the-counter medication. We will not accept staff arriving at work under the influence of alcohol or drugs, or whose ability to work is impaired in any way by reason of the consumption of alcohol or drugs, or who consume alcohol (except as set out at paragraph 1.4 below) or take drugs (other than prescription or over the counter medication, as directed) on our premises.
- 1.4 Members of staff should not drink alcohol during the normal working day, including at lunchtime or during other breaks. Alcoholic drinks may only be consumed at a Rightmove site with a manager's approval or in connection with approved business and social functions, and any such drinking of alcohol should be reasonable and moderate. We expect everyone to demonstrate responsible behaviour at work, work-related functions and work-related social events and to act in a way that will not have a detrimental effect on our reputation or cause embarrassment, distress or offence to others.
- 1.5 You must comply with drink-driving laws and drug-driving laws at all times. Conviction for drink-driving or drug-driving offence may harm our reputation and, if your job requires you to drive, you may be unable to continue to do your job. Committing a drink-driving or drug-driving offence while working for us or outside working hours may lead to action under our Disciplinary Policy and could result in dismissal.
- 1.6 If you are prescribed medication you must seek advice from your GP or pharmacist about the possible effect on your ability to carry out your job and whether your duties should be modified or you should be temporarily reassigned to a different role. If so, you must tell your manager or the People Team without delay.
- 1.7 Rightmove does not allow smoking in any Rightmove buildings, including e-cigarettes. Those wishing to smoke must do so away from any Rightmove building in their own time, without any disruption or detrimental impact on their duties.

2. BUSINESS PRACTICES

- 2.1 We adhere to the highest ethical standards and this is reflected in every aspect of the way in which we operate.
- 2.2 All Rightmove directors and employees must declare any potential or actual conflicts of interests, whether personal or financial, that may affect the proper performance of their duties to Rightmove, conflict with Rightmove's legitimate business and commercial interests or conflict with Rightmove's duty of care to its consumers and customers.

- 2.3 You must not accept any inducement designed to influence you inappropriately or which seems to influence your actions in the performance of your job. It is best practice to inform the Company Secretary of invitations to corporate events or of gifts offered or given. All members of staff must act in accordance with the Financial Crime policy.
- 2.4 Any employees involved in Financial Conduct Authority (FCA) regulated activities must also ensure that they comply with their regulatory responsibilities at all times (for more details see paragraph 5 below), and if they have any questions or concerns in relation to this they should contact Rightmove's Head of Compliance.
- 2.5 All cash must be handled according to Rightmove's rules and procedures and documented accordingly.
- 2.6 You are not permitted to order any goods or services or otherwise commit Rightmove to any financial liability, or agreement, or contract, outside of the authorised limits relevant to your position, as defined by the Finance Department.

3. RIGHTMOVE'S ASSETS AND INFORMATION

- 3.1 As in any competitive environment, confidentiality is of utmost importance both within and outside Rightmove. No documents (including computerised documents) relating to Rightmove or its business may be removed from the office unless expressly authorised by your manager. You shall not make any copies, abstracts, or summaries of such documents or software at anytime, except with the express written permission of your manager. All such documents remain the property of Rightmove and, at the end of your employment, you shall return to Rightmove all documents, software and property belonging to Rightmove which is in your possession.
- 3.2 All Rightmove property must be stored securely in accordance with Rightmove's instructions, including when employees are working remotely in accordance with Rightmove's Hybrid Working policy. Any data breaches must be reported immediately, in accordance with Rightmove's Data Protection, Categorisation and Retention policy.
- 3.3 All Rightmove equipment and systems must be used appropriately and kept secure in accordance with Rightmove's Acceptable Use of IT policy.
- 3.4 Rightmove reserves the right to monitor employees' usage of its IT systems including email, Microsoft Teams, Slack, internet and intranet, company mobile and landline phones, computers and tablets, in accordance with its Acceptable Use of IT policy and Data Privacy Notice.
- 3.5 You may not make audio or visual recordings containing any confidential information, business discussions or otherwise in the work environment unless you have a legitimate business reason to do so and have notified all participants. You must never record any conversations with colleagues, consumers or customers secretly or covertly.

- 3.6 If you receive an enquiry from the media or even if you just suspect that you are speaking to a member of the press you must redirect the enquiry to the Head of PR. This is to ensure that enquiries are dealt with effectively, accurately and promptly whilst protecting the image of the organisation. You must also comply with the Social Media policy.

4. YOUR RESPONSIBILITIES

- 4.1 You must ensure that you read, understand and comply with this Code of Conduct.
- 4.2 You must also:
- 4.2.1. notify your manager or a member of the People Team as soon as possible if you believe or suspect that a breach of this Code of Conduct has occurred, or may occur in the future; or report your concerns anonymously to the independently operated whistleblowing line (contact details in the Speak Up/Whistleblowing Policy);
 - 4.2.2. understand and comply with specific laws and regulations that apply to your specific role; and
 - 4.2.3. complete any mandatory associated training that is assigned to you within the provided timescales.
- 4.3 Disciplinary action in accordance with our Disciplinary Policy, up to and including termination and/or legal proceedings, may result from any failure to comply with this Code of Conduct, any other Rightmove policy, or any applicable laws, rules or regulations.

5. REGULATORY DUTIES

- 5.1 Employees involved in FCA regulated activities, including but not limited to employees working within our regulated subsidiaries (with the exception of ancillary staff) are subject to the FCA regulations, including the FCA Code of Conduct Rules, which set minimum standards of individual behaviour. The individual conduct rules specify that individuals (with the exception of ancillary staff) must:
- 5.1.1. act with integrity;
 - 5.1.2. act with due skill, care and diligence;
 - 5.1.3. be open and cooperative;
 - 5.1.4. pay due regard to the interests of customers and treat them fairly;
 - 5.1.5. observe proper standards of market conduct; and
 - 5.1.6. act to deliver good outcomes for retail customers.
- 5.2 It is important that if you are involved in, or have oversight of, FCA regulated activities, you act in accordance with the FCA's 12 Principles for Business (which are set out in the FCA handbook PRIN 2.1). It is important to ensure that customers are treated fairly, and that we act to deliver and can demonstrate good customer outcomes.

- 5.3 If you are a Senior Manager (SMCR) regulated by the FCA, you have additional obligations and are required to adhere to the SMCR Rules, which specify that you must:
 - 5.3.1. take reasonable steps to ensure that the business of the firm for which you are responsible is controlled effectively;
 - 5.3.2. take reasonable steps to ensure that the business of the firm for which you are responsible complies with the relevant FCA requirements and standards;
 - 5.3.3. take reasonable steps to ensure that any delegation of your responsibilities is to an appropriate person and that you oversee the discharge of the delegated responsibility effectively; and
 - 5.3.4. disclose appropriately any information of which the FCA would reasonably expect notice
- 5.4 Breaches of the Conduct Rules by SMCRs must be notified to the FCA within 7 days. Breaches of the Conduct Rules by certification staff or conduct rules staff must be notified to the FCA annually in October using Form H (also known as “REP008 – Notification of Disciplinary Action”).
- 5.5 If you have any questions in relation to your regulatory duties, you should contact Rightmove’s Head of Risk and Compliance.