# CODE OF CONDUCT

Being part of Rightmove (meaning Rightmove Group Limited, Rightmove Plc and Rightmove Landlord and Tenant Services Limited and any other group companies) means upholding a shared commitment to integrity, respect, and professionalism. Our Code of Conduct sets clear expectations to help protect our reputation, guide ethical behaviour, and ensure a safe, inclusive, and supportive workplace for all. Everyone plays a role in maintaining these standards and representing Rightmove.

We are committed to making Rightmove a place where every Rightmover can do the best work of their lives. Giving everyone meaning, clarity and accountability in the work they do through an open and collaborative culture. At the heart of everything we do are the Rightmove 'Hows' – they define the expectations we have for all Rightmovers and additional expectations for those who lead others. These are essential behaviours which reflect our culture, and more information on the way the 'Hows' apply to you is available in RightmoveLife.

Our 5 'Hows' are:

- We **create value** by delivering results and building trust with partners & consumers.
- We **think bigger** by acting with curiosity and setting bold aspirations.
- We **care deeply** by being real, having fun, and valuing diversity.
- We **move together** by being one team- internally collaborative, externally competitive.
- We **make a difference** by focusing on delivering measurable impact.

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 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, even if these take place outside of working hours or are not officially work-related. In all cases behaviour should remain professional and respectful, avoiding any actions that could 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. You are required to notify the company immediately of any convictions related to drink-driving or drug-driving, whether it occurs during or outside of working hours. 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.

1.6 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 are committed to adhering to the highest ethical standards and this is reflected in every aspect of the way in which we operate, to enable us to maintain the reputation and confidence that consumers and partners have in us.

2.2 We have a framework of fraud related policies that are designed to prevent fraud within our workplace. Examples of these are detailed below and our full range of policies can be

found on RightmoveLife. Our Risk Committee is responsible for the development and implementation of the organisation's fraud prevention procedures.

2.3 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.

2.4 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.

2.5 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.

2.6 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 any time, except with the express written permission of your manager. In addition, documents or information relating to Rightmove must not be shared electronically outside the company (e.g., via personal email, messaging platforms, or cloud storage services), unless explicitly authorised. 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 reportedly 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 are expected to act in a manner that protects and promotes the reputation of the Company and should avoid any behaviour, whether at work or outside of work, that could reasonably damage its reputation, relationships, or brand.

4.3 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.

4.4 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.

4.5 It should be noted that Rightmove may be criminally liable for the acts of its employees. This includes offences linked to economic crimes (e.g. fraud) as well as all other criminal offences that include computer misuse offences, modern slavery and human trafficking

offences, data protection offences and perverting the course of justice (e.g. destruction of documents relevant to investigations).

## 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.