# ‘Speak Up’ /Whistleblowing Policy

# (how to raise a serious concern)

## Commitment

Rightmove and its leaders are committed to upholding the highest standards of integrity, honesty, and accountability. Rightmove has a **Code of Conduct** and expects all employees to follow it. Rightmove provides ‘speak up’ training, with real life examples, to help everyone to understand when to ‘speak up.’

If you believe that someone at Rightmove, or someone who is connected to Rightmove, such as a supplier or a partner, is doing something that is illegal, unethical, or improper, there are several ways that you can raise a concern, or ‘speak up’.

You have the right to raise your genuine concerns about illegal, unethical, or improper behaviour, to feel safe in doing so, and to have confidence that your concern will be properly investigated.

Raising concerns about improper or unethical behaviour at an early stage is encouraged and is the responsibility of everyone at Rightmove.

This ‘Speak Up’ Policy applies to all Rightmove employees and to all contractors providing services to Rightmove.

## What kind of activities could be reported under this ‘Speak Up’ Policy?

- Financial malpractice, impropriety, bribery or fraud
- Theft or misuse of Company data
- Serious breach of Rightmove’s policies
- Failure to comply with Rightmove’s legal obligations
- Harassment, sexual harassment, or victimisation
- Actions which endanger the health and safety of employees, customers or the public, or that cause damage to the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Actions which are intended to conceal any of the above

## Speaking up

Many concerns can be addressed internally, so please consider discussing your concern with either your line manager, a member of the People team, or the Company Secretary first.

Rightmove has a separate **Grievance Policy** and process, which you should refer to, if you have a complaint about your job or working conditions that cannot be resolved by your line manager.

There is an **Anti-Harassment and Bullying Policy**, which you should refer to first, if you have experienced harassment or bullying. Your job will not be at risk, and there is a zero-tolerance approach towards any form of retribution, victimisation or harassment that takes place following a concern being raised under this 'Speak Up' Policy.

If you can raise your concerns in person confidentially, rather than by making an anonymous report, it will be easier for Rightmove to investigate, resolve your concern and give you feedback about the outcome, if possible. If you wish to remain anonymous, you can do so, unless there is an overriding reason your identity needs to be disclosed, such as being able to conduct a thorough investigation of your concern.

**This policy is in place to capture genuine concerns about illegal, unethical, or improper behaviour. Anyone found to be abusing the policy through making false allegations will be subject to disciplinary action.**

## There are different ways that you can speak up

If, for whatever reason, you feel you cannot speak with your line manager about your concerns, or if you think it has not been handled properly, then you can raise your concern by email, or in person, with the Company Secretary, or you can contact the Chief People Officer, or the Head of Business Partnering.

### How to raise a concern with the Financial Conduct Authority (FCA)

If your concern relates to regulated activities, it can be escalated directly to the FCA using the following methods:

- call the FCA dedicated team: 0207 066 9200
- email: whistle@fca.org.uk
- write to the FCA: Intelligence Department (Ref PIDA) Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN
- use the FCA's online form to make a report: https://www.fca.org.uk/firms/whistleblowing/where-make-report

### Our external speak-up reporting channel

We have an independently operated 'speak up' line, run by Navex Global. Its employees are impartial and are trained to handle sensitive disclosures and encourage you to share your concerns in confidence. Your call to Navex Global will not be traced or recorded. Where reports are submitted through online channels, device and location data will not be retained. All information (except for your identity, if you wish to remain anonymous) will be passed by Navex Global to the Company Secretary (or their nominee) (if either of these people are the subject of the report, an alternative will be notified) who has been nominated by the Board to deal with 'speak up'/whistleblowing matters.

### How to submit a report via Navex Global

- Call the hotline: **0800 820 3401**
- Visit the online portal: rightmove.ethicspoint.com

## How we handle your concern

Once you have reported your concern, we will review it to assess what action should be taken. Depending on the nature of your concern, this may mean an internal inquiry or a more formal investigation. We will tell you who your point of contact will be and whether we will need further assistance from you. We may ask you how you think your concern should be best dealt with. If you have a personal interest in the matter, we ask that you tell us at the outset.

Wherever possible, we will aim to give you as much feedback as we can, but depending on the concerns raised, we may not be able to give you specific details and we may need to wait until any investigation is complete.

We will always try to handle a matter fairly and properly both in relation to the person raising the issue and any individual who may feel their behaviour and actions have been called into question.

## How the matter can be taken further

We trust that those using this process will be satisfied with the way in which their concerns are treated and any investigations that may be conducted. However, if you are not satisfied and feel it right to raise your concerns outside Rightmove, the matter can be raised with:

- Protect, a whistleblowing/speak up charity, on 020 3117 2520 or https://protect-advice.org.uk/contact-protect-advice-line/
- a solicitor, or
- another relevant regulatory or professional organisation.

Any individual has the right and responsibility to refer a concern to the Police if they suspect a criminal act.

Rightmove hopes that other than in exceptional circumstances, you will try to resolve your concern using an internal route first, before resorting to external routes.

### Record keeping

The Company Secretary and Chief People Officer keep records of compliance with this policy.

### Contacts

Please contact the Company Secretary or Chief People Officer if you have any questions or concerns about this policy.

**The person who has overall responsibility for this policy is:**

Chief Financial Officer

**Approved by the Audit Committee** 5 November 2026

Last review: November 2025

Next review: November 2027