



CODE OF BUSINESS  
CONDUCT **2023**

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## MESSAGE FROM **RICHARD HARPIN**

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As the Founder and Chairman of HomeServe I am very proud of our business, our people, and our achievements, and I want all of our people to share in this pride. This Code is designed to help you to understand your responsibilities as a part of HomeServe and to be an ambassador for our business.

We are all individually responsible for demonstrating the highest standards of integrity. Regardless of your role, seniority, or location, you are required to comply with our Code, our policies, and standards, and with all applicable laws and regulations that relate to your work, at all times. No Code, policy or standard can cover every situation we face. It's important that we all apply common sense and good judgement, and only act in ways that support our values and purpose. If you are ever in doubt, you should ask for guidance and if you have concerns, you should speak up.

Please take the time to read and understand our Code, and with support from your colleagues and your manager ensure you understand your responsibilities, know who to go to for help, and how to raise a concern without fear of reprisal.



RICHARD HARPIN

*Founder and Chairman of HomeServe*



# ACTING WITH **INTEGRITY**

At HomeServe we conduct our business with integrity and the purpose of our Code of Conduct is to help our people (our employees and workers) to do the right thing and act in accordance with our values and policies.

If you ever find yourself questioning your conduct, stop, and think – is it in line with HomeServe’s values and policies?

Consider the following:



## OUR PURPOSE

**Is to make home repairs and improvements easy**

## OUR VALUES



Put customers at the heart of everything we do



Combine relentless innovation with integrity and professionalism



Develop and encourage great people who are passionate about taking responsibility and making things happen



Strive to be the best in the world at what we do

# INTRODUCTION

## WHAT IS THE CODE?

This Code is a guide to help you to understand the ethical and legal standards HomeServe has committed to, and your responsibilities as a representative of the business.

The Code serves as a comprehensive framework outlining some of our main policies, standards, and procedures. Its purpose is to guide us in maintaining our well-established reputation for integrity, professionalism, and strict adherence to legal and compliance obligations. The policies referred to in the Code may differ depending on the country you work in or the business you are part of, but the overriding principles of the Code are the same for all of us.

As a valued member of our team, you play a critical role in upholding our culture of ethical excellence. By consistently acting with integrity and following our Code, you help to ensure that we continue to operate in a manner that reflects our values.

It is important that you familiarise yourself with our Code and make a commitment to comply with its guidelines. This document provides essential guidance for conducting business and serves as a valuable reference for ethical decision-making.

In addition to our Code, you must comply with all applicable Company policies, including the Whistleblowing Policy, Anti-Bribery and Corruption Policy, Information Security Policy, and Financial Crime and Sanctions Policy.

## WHY WE HAVE THE CODE

It's simple – HomeServe is a responsible business that cares about its customers, colleagues, and the communities it operates in. The Code provides a transparent framework with the intention of setting a common standard we can be proud of. As a business, we need to ensure that we have a robust approach to managing our risks and the Code also plays a part in helping us to do that.

## OUR RESPONSIBILITIES AS HOMESERVE AMBASSADORS

### **Every individual within HomeServe is expected to:**

- Act honestly, responsibly, and decently, with respect for the people we interact with
- Understand this Code and what is expected of them
- Accept responsibility for their actions
- Report any violations of the Code.

## OUR RESPONSIBILITIES AS LEADERS

### **HomeServe's leaders are expected to:**

- Lead by example
- Create a culture of compliance in which their teams understand their responsibilities and feel comfortable raising concerns
- Ensure that employees understand that business results are never more important than compliance with HomeServe's ethical and legal standards.

## WHO THE CODE APPLIES TO

The Code applies to everyone who represents HomeServe. All directors, officers, employees, temporary workers, consultants and contractors including those in subsidiaries of HomeServe.

## WHAT ARE MY RESPONSIBILITIES?

You have two main responsibilities. First, you must follow every aspect of the Code and certify your commitment to comply with it each year. Second, if you suspect someone may be violating the Code or any of our policies you have an obligation to report it.

## HOW SHOULD I ASK FOR HELP?

If you have questions about the Code or its associated policies or about the best course of action to take in a particular situation, you should seek guidance from your manager/supervisor or People Business Partner/HR Representative who will liaise with the legal team as necessary.

## WHAT IF I WOULD LIKE TO MAKE AN ANONYMOUS REPORT?

You may make an anonymous report by contacting the Company's reporting helpline, which is available 24/7 and operated by an independent third party. If you choose to make an anonymous report, your anonymity will be protected to the fullest extent as possible as permitted by law, but keep in mind that it may limit the Company's ability to investigate your concerns.

## ANNUAL DECLARATIONS

You will be asked, on an annual basis, to confirm that you have read this Code and agree to comply with the standards set out within it.



## FAQs

**Q. What happens if someone breaches the Code of Conduct?**

A. HomeServe operates with a zero-tolerance approach, which means that we will always investigate and treat allegations of unacceptable behaviour seriously; and take action appropriate to how serious the breach of the Code is. This could range from disciplinary action, termination of employment, to criminal prosecution depending on the issue.

**Q. If I raise something will I have to be identified?**

A. We would prefer you not to raise concerns anonymously, as this makes it more difficult for us to investigate them. If you have any concerns about identifying yourself, speak to the Assurance Director. We will seek to accommodate any requests for anonymity as far as practicable and will of course conduct any investigation strictly in accordance with the local law of

the country in which you work. You should refer to HomeServe's International Whistle Blowing Policy for further information. Anonymous concerns can be raised via our reporting helpline.

**Q. We are a global Company. Does this apply to all of our markets?**

A. Yes, the Code applies to all markets and business units.

## OUR CUSTOMERS

### We are committed to providing good outcomes for our customers.

To help us achieve this, each business has a customer promise, like this one for HomeServe Membership Ltd in the UK:

#### DO THE RIGHT THING

Some of our UK companies are regulated by the Financial Conduct Authority (FCA). If you work in the UK please make sure that you understand and abide by the Conduct Rules that have been prescribed by the FCA. The Conduct Rules are outlined in the HML Disciplinary Policy.

**Our CUSTOMER PROMISES**

- We Care**  
Our people are here to help. They take time to listen and help you find the right product or support.
- We're Straightforward**  
Our communications are clear and easy to understand.
- We're here**  
When you need us we make it easy to contact us and will keep you informed at every step.
- We're Experts**  
We regularly review and improve our products and services to ensure we continue to meet your needs.
- We Listen**  
Everything we do is to help you take better care of your home, if we don't get things right, we say sorry and put it right.

#### FAQs

- Q. I am concerned about the number of customer complaints we are getting over the phone. What should I do?
- A. You should share your concerns with your manager. We are always looking for ways to improve our service so if you have any suggestions, don't hesitate to put them forward.
- Q. I am worried about an elderly customer who isn't covered for the repair they need but can't afford to pay for it. What should I do?
- A. Speak to your manager. In many of our businesses we have a hardship fund to help customers like this.





## OUR **REPUTATION**

**We are committed to conducting our business with integrity, fairness, and honesty.**

As ambassadors of HomeServe, our people all play an active role in maintaining HomeServe's reputation.

### COMPLIANCE WITH THE LAW

As a business we operate within the laws and regulations of each of the countries we are in, and we expect our people to do the same. Illegal behaviour will lead to disciplinary action, and in most situations, will be escalated to the authorities.

In the hopefully unlikely event that an employee commits a crime either at work or outside of work, they are expected to report it to either their manager or their legal team.

Our legal teams are here to help us do the right thing and you should consult with them on all legal matters. This includes providing information, particularly confidential information, to government authorities. Employees have rights in such situations and your legal team can help you to identify the right assistance.

### RECORDS AND PUBLIC DISCLOSURES

All business records and public disclosures must be accurate and complete. It is always better for individuals and the business to be complete and honest.

Certain documents must be preserved to maintain an accurate record of business activity for litigation and investigatory purposes.

### DO THE RIGHT THING

- Never hide or manipulate business information.
- Speak up if you observe any issues with the oversight, preparation and maintenance of records and public disclosures.
- Make yourself aware of any documents in your line of work that must be preserved.

## BRIBERY AND CORRUPTION

Acting with integrity is a core part of our HomeServe culture. Bribery and corruption go against this core value and are not tolerated at HomeServe.

Bribery consists of someone authorising, offering, soliciting, giving, receiving, or accepting anything of value, or any financial or other advantage, in order to induce the recipient to act in breach of trust, or to ensure favourable treatment whether by a company, government authority, official or employee. Bribes can consist of cash payments, gifts, entertainment, favours, any item or service of value, or any other financial advantage. Bribery is a criminal offence in all of the jurisdictions in which HomeServe operates.

Facilitation payments, which are small payment(s) to expedite routine government actions (e.g., issuing permits, approving immigration documents), are also considered bribes and are not tolerated by HomeServe. For more information, please refer to our Anti-Bribery and Corruption Policy and Programme.

## DO THE RIGHT THING

- Never offer, authorise, or accept bribes, or any other form of improper payments.
- Follow the Gifts and Entertainment guidance, the Charity Contributions and political donations guidance, and our Financial Crime and Sanctions Policy.
- Ensure that all accounts and financial records are complete and accurate, and that it is clear what each transaction relates to.
- No cheque should ever be made from a HomeServe bank account payable to "cash" or the "bearer".
- Check with the legal team for any requests for cash payments to a government official or any other business partner.
- Never ask for payment from any of our business partners for your own personal gain.
- Always do your due diligence before establishing a relationship with a business partner on behalf of HomeServe to ensure they do not pose a bribery or corruption risk.

If you need more information, please read our Anti Bribery and Corruption Policy and Programme and (where appropriate) our Financial Crime and Sanctions Policy.

## FAQs

**Q. I work in procurement and we are currently in a tender process. One of the suppliers offered to take me to the World Cup. Does this count as business entertainment, or is this bribery? What should I do?**

**A.** All suppliers in a tender process should be treated fairly. This situation could be seen as a conflict of interest or perceived as an unfair advantage for a supplier. You should not accept the invitation and should raise with your manager and where appropriate seek advice from the legal team.

**Q. My manager asked me to enhance some performance data, with the promise that if I did so I would receive a better end of year review. What should I do?**

**A.** You should raise this with your manager's manager or someone in your local HR team. You should never feel pressured to do something dishonest in order to receive a good appraisal.

## FACILITATION OF TAX EVASION

HomeServe has a zero-tolerance policy towards tax evasion and the facilitation of tax evasion, both of which are criminal offences.

As a business we can be found guilty of a criminal charge if someone "associated" with us has facilitated tax evasion. The term "associated person" extends to all HomeServe employees, suppliers, contractors, agents, and anyone else deemed to be acting for or on behalf of HomeServe.

### DO THE RIGHT THING

- When handling a supplier take-on process, follow HomeServe procedures closely.
- Always be aware when handling interactions with our business partners, particularly in our supply chain. Continued due diligence is key.
- If you have a concern relating to the facilitation of tax evasion, raise it with your manager.

If you need more information, please read our Financial Crime and Sanctions Policy.

### FAQs

- Q.** A supplier asks to be paid into an offshore account which differs from the bank account set up in our supplier database. Should I go ahead and pay him?
- A.** Any requests like this, which ask for a change to a verified payment method, should be reported to your Line Manager, and checks to understand the reason for and validity of the request should be carried out. To simply go ahead and pay the supplier could amount to facilitating tax evasion.





## GIFTS AND ENTERTAINMENT

Routine business entertainment such as lunches and dinners has a role to play within some aspects of our business, as long as the gift or entertainment is appropriate to the relationship, modest in value, and doesn't create the appearance of impropriety. However, cash or cash equivalent payments are not allowed. It's important to note that gifts should not be given to or received from public officials.

It is crucial that business entertainment is only used to foster honest business relationships and not to act as a form of bribery.

### DO THE RIGHT THING

- Anyone wishing to provide hospitality on behalf of HomeServe to an existing or potential customer or partner must obtain prior consent from their Director or Chief Executive.
- Gifts made to a supplier, customer, or client of HomeServe must not exceed £200 or the local currency equivalent, or a lesser amount determined by your local business unit.
- You must inform your Line Manager if you are sent any gifts including the nature of the gift, the donor, and the value.
- Line Managers should discuss disclosures with their local HR Department as appropriate.

## FAQs

**Q:** I have received an unexpected gift from a supplier which I think is worth £100. What should I do?

**A:** You should inform your Line Manager and share the nature of the gift and who supplied it. Your Line Manager will discuss with you whether it is appropriate to keep the gift and will liaise with the HR Department as appropriate to agree if further action is necessary.

**Q:** What is a bribe?

**A:** A bribe is when something of value is given or received improperly to gain an unfair advantage in business. It can take many forms beyond cash payments, such as gifts, travel, and employment opportunities.

## FRAUD

Fraud is an intentional act to use deception, a breach of confidence, or a misrepresentation to gain an illegal or dishonest benefit. Fraud is not tolerated at HomeServe and will lead to disciplinary action.

### DO THE RIGHT THING

- Never make misleading or recklessly false statements about our products, services, security, privacy, compliance practices, financial position, or Company policies.

## MONEY LAUNDERING

Money laundering is the process by which illegally obtained money is given the appearance of having originated from a legitimate source.

We're strongly committed to preventing our Company's operations from being used for money laundering, financing terrorism, or any other criminal activities. To comply with applicable anti-money laundering laws, we'll take appropriate actions.

To ensure we're doing everything possible to prevent our operations from being used for illicit activities, it's important to require our counterparties to make anti-money laundering representations in documents with our Company. Our legal teams can provide these representations upon request. If you have any questions or concerns about anti-money laundering laws or how to comply with them, please reach out to your legal team.

### FAQs

- Q. I work in marketing and I am concerned that a new campaign might be misleading to customers. What should I do?
- A. You should talk to your manager about this. We want to treat our customers fairly and ensure they fully understand our products and services.

### DO THE RIGHT THING

- If you have any suspicions about whether the source of any funds is legal, please raise this with your manager.

### FAQs

- Q. If an employee wishes to be paid into a bank account which doesn't appear to be theirs, what should I do?
- A. Contact your Line Manager for advice. It might be nothing material. However, it is always best to check.

If you need more information, please read our [Financial Crime and Sanctions Policy](#).

## CONFLICTS OF INTEREST

At HomeServe we strive to operate in and create a fair working culture. You should therefore avoid situations where your personal interests might conflict or seem to conflict with the independent judgement required in your role.

### Care should be taken in:

- Dealing with suppliers, clients, customers, and other parties doing or seeking to do business with HomeServe companies
- Transactions in Brookfield's shares or shares of any company with which HomeServe has or is likely to have a business relationship
- Acceptance of outside positions, particularly with a competitor of HomeServe (whether or not for a fee)
- Investments in competitors, suppliers, and other parties seeking to do business with HomeServe.

In appropriate circumstances, HomeServe encourages you to be involved in outside business activities. However, the permission of your local Chief Executive must be sought if there is any risk that the activity may result in a conflict of interest between that activity and HomeServe. You should also check the terms of your contract as this may contain restrictions or other limitations on your business activities outside of HomeServe.

It is also possible for you to have a conflict of interest with a previous employer if you have signed a confidentiality, non-compete or non-solicitation agreement with them. If you are subject to any of these you should notify your manager, who will consult with the legal team if needed.

Whilst we do not wish to interfere in the personal or family relationships or relationships between co-workers, it is important that employees or workers are not, and do not appear to be, influenced by personal relationships. As a consequence, any employee or worker must not be involved in any decision to hire, dismiss, promote or reward any family member or person with whom they are in a personal relationship that might improperly influence their decision.

Due to the potential for conflict of interest, managers should not normally employ relatives at the same location/department as themselves. If they wish to consider such appointments, they must first obtain the express permission of their Chief Executive and the local HR Director. All such appointments must be discussed with the relevant HR department prior to offers being made.

## FAQs

Q. There is a job available in my team and my cousin would be an ideal candidate for it. Can I suggest him for the job even though we are related?

A. It's fine to recommend a family member or friend for a job if they are qualified for it and would be a good candidate. However, you should be clear about your relationship with the candidate from the start and you should not be involved in the recruitment process. In addition, you should not become the manager of any family member or anyone you are in a relationship with.

## TRADE SANCTIONS

Sanctions are restrictions imposed to target countries, as well as individuals, suspected of engaging in activities related to terrorism, drug trafficking, the spread and production of weapons of mass destruction, or other threats to security. Sanctions are imposed as a matter of security by governments.

HomeServe is committed to complying with all sanctions, related laws, and regulations. Each of our businesses are responsible for monitoring and complying with sanctions laws.

### FAQs

**Q. We have found a supplier of products or services which appears to be owned by a company in a known tax haven. Should we be concerned?**

A. Yes. Tax havens are frequently used by governments and/or individuals who are subject to sanctions. Such tax havens help to hide the identity of those involved. The identity of the ultimate owners of the business should be established before any contract is signed. Whilst the persons involved could be entirely innocent, they could be subject to a sanctions list. Even if they are not subject to a sanctions list, they could be involved in tax evasion or money laundering. Raise the issue with your Line Manager and local legal team, who can assist you to conduct appropriate due diligence. Ultimately if you cannot establish the identity of the ultimate owners, no contract should be entered into with the company concerned.

## FAIR COMPETITION

Competition and antitrust laws apply across all the jurisdictions within which HomeServe operates and we are committed to complying with them.

### DO THE RIGHT THING

- Avoid entering into any form of agreement with competitors regarding HomeServe's pricing, product type or terms and conditions, product distribution, territories within which HomeServe will operate, or customers.
- Avoid exchanging or discussing information regarding the prices, terms and conditions of sale or service, or any other competitive information with a competitor.
- Only enter into agreements with joint venture partners within the scope of the joint venture.
- Always consult your local legal team before exchanging any information with competitors or entering into any agreements.

### FAQs

**Q. Our joint venture partner has asked about all our pricing models, for products we operate with them, and without them. What information can I share?**

A. You can share information surrounding the products we operate with them as a joint venture. If you are unsure, check with your local legal team.

If you need more information, please read our [Financial Crime and Sanctions Policy](#).

## CHARITY CONTRIBUTIONS

At HomeServe we actively support many charitable causes with the help and support of our people but it's important to make sure that all charities we support are genuine and our support can't be misconstrued.

### FAQs

**Q. I am part of a local charity and we are looking to be sponsored for an event. Would it be OK to ask colleagues to sponsor me?**

**A.** Yes, that's fine. You are welcome to ask your colleagues, however you cannot use your position at HomeServe to put pressure on your colleagues to donate.

### DO THE RIGHT THING

- Stop and think – make sure donations to any institution are genuine and cannot be misconstrued as bribery. Get the approval you need before making any donation or contribution.
- All charitable donations must be approved in accordance with local requirements (and if there is no approval process locally, donations must be approved by the local Chief Executive). All contributions must be recorded by the relevant local finance team.

## EXTERNAL COMMUNICATIONS

Anything that can be seen by the public could affect HomeServe's reputation. From posting on social media to conversations with the press, it is important that we are mindful of what we say about HomeServe. As individuals we all have a right to speak our minds. However, we should be aware of what effect this could have on our brand and business. Innocent and passing comments can be taken out of context and could have long-lasting detrimental effects on HomeServe.

### DO THE RIGHT THING

- Think before you post or comment publicly about what the repercussions of your words could be. Could they be taken out of context and cause unintended harm to our business?
- Do not engage with the press or media without the support of your local communications team.

### FAQs

**Q. I have been asked to do an interview about my experiences at HomeServe by a media outlet. Do I need to notify HomeServe about this?**

**A.** Yes, you should notify your manager and local communications team as they will be able to guide you on what it is appropriate to say.



## POLITICAL DONATIONS

Political donations by or on behalf of HomeServe are highly discouraged. Any political donation or contribution, regardless of the amount, requires prior authorisation from the Board of Directors. If you have any concerns or questions, please contact the Group CFO or the Group Legal Counsel.

### FAQs

**Q. I have strong political views and campaign for my chosen party on social media. I'm concerned that many people, including colleagues, will find my views controversial. What should I do?**

**A.** As an individual you are welcome to express your views. However, there should be no suggestion that they represent HomeServe's views. It is always worthwhile considering how voicing your views will affect your working relationships, and the wellbeing of others. Remember at HomeServe we will not tolerate disrespectful treatment of others, so make sure your actions are aligned to our values.

## PROVIDING INFORMATION TO GOVERNMENT AUTHORITIES

If you receive a request from a government authority such as law enforcement or a regulator for confidential Information you obtained while working for us, you should contact your legal team for advice before responding.

This Code does not prohibit or restrict you from disclosing Information to a government authority In compliance with applicable whistleblowing regulations or other applicable law.

If you need more information, please read HomeServe's Anti Bribery and Corruption Policy.

A photograph of a middle-aged man and woman sitting at a table in a kitchen, looking at a laptop. The man is wearing glasses and a maroon sweater, and the woman is wearing a pink sweater. A red mug with white polka dots is on the table. The background shows a brick wall and a window with a view of a city.

OUR **INTERESTS AND ASSETS**

**We are committed to protecting our people, customers, and business and we are all custodians for HomeServe's interests and assets.**

## ENTERING INTO CONTRACTS

HomeServe enters into many agreements with third parties, such as suppliers, and business partners. It is important that such agreements are legally binding to ensure both parties understand what is expected from the relationship. It is important that all contracts are entered into with proper approval. Before executing any contracts or agreements you must refer to the local Delegated Authority Matrix for your business or consult a member of the legal team to determine who has the necessary authorisation to approve and sign the contract.

### DO THE RIGHT THING

- Make sure that your legal team is involved in the negotiation of any agreement before it is signed.
- Only enter into a contract on behalf of HomeServe if you have the authority to do so.

## FAQs

**Q. A contract was signed with a supplier; however, what is needed has changed, and we need to add on additional products to the contract. Do I need to sign a new contract?**

**A. Yes, you will need to get the contract amended (with input from your manager and the legal team) and both parties should sign it.**

## CONFIDENTIAL BUSINESS INFORMATION

HomeServe employees may routinely have access to confidential or proprietary information about HomeServe's business or its customers, suppliers, or joint venture partners. This information is confidential and must not be disclosed or shared during or after an individual's employment with HomeServe. If such information were leaked it could be harmful for our business, our customers, our people, or anyone we do business with. This also applies to any information shared by joint venture partners, suppliers, and customers.

### DO THE RIGHT THING

- Never disclose any confidential information relating to HomeServe or parties we do business with.
- Only disclose confidential information if authorised to do so in writing by HomeServe.
- Be aware of your surroundings. Do not discuss confidential business in public places, and be careful to not leave confidential materials lying around.

## FAQs

**Q. Can I talk to family and friends about things that I read about in the corporate communication memos that are distributed to all employees, or would this information be confidential?**

**A. Unless a piece of communication mentions that it is confidential, you are welcome to discuss this outside of HomeServe.**

**Q. I've been given a confidentiality agreement to sign by a potential new partner. They won't give me the information I need to assess whether we should work together unless I sign it. What should I do?**

**A. You should ask your legal team to review it and if they are happy with it, arrange for an authorised signatory in the business to sign it.**

## INFORMATION SECURITY

HomeServe provides you with technology and access to its corporate systems in order for you to carry out your job efficiently and securely. To maintain security, we rely on our people to use these responsibly and always exercise good judgement. Please make sure you comply with HomeServe's security policies and procedures as well as understanding how to identify and report a security incident.

When you are supporting or leading business change, whether related to technology or to process, please consider how that change may impact the safety and security of our information. If in doubt, please contact your Information Security representative.

### DO THE RIGHT THING

- Never use HomeServe systems or technology in a way that is illegal, could cause damage, or could negatively impact our customers or our business. When responding to or opening external emails as well as clicking on links, opening attachments, and accessing websites, use caution and care.
- When in the office or whilst working from home, physical security is important, so locking away equipment when not in use and/or keeping a clear desk are important. Whilst on a HomeServe site, you should always wear your ID badge.

### FAQs

**Q. Where can I find more information?**

A. Typically guidance and advice as well as policies and procedures are available on the Company intranets, as well as the Group Compliance, Risk and Ethics portal. If unsure, contact your local Information Security representative.

**Q. How do I report a security incident?**

A. Contact your IT help/service desk.

If you need more information, please read HomeServe's Group Information Security Policies.

## GENERATIVE AI

Ensure Generative Artificial Intelligence (AI) Tools are used appropriately and in accordance with HomeServe's values, ethical guidelines and policies and our customer commitments.

Generative AI tools such as ChatGPT, Bard, Bing, Ernie, and other products with pre-trained language models are powerful tools that can benefit our business if used appropriately. The use of these tools, however, can present significant risks relating to our data privacy controls, the protection of confidential information and the reliability of AI generated outputs. Any information inputted into a generative AI tool becomes incorporated into the model. This creates the potential for inputs to be owned by the product provider and for such inputs to be shared with other users outside the organisation.

Additionally, a generative AI tool is limited by the data available for its training. Such data may be incomplete or out of date, which can result in the model providing inaccurate or unreliable information. Other than as set out below, confidential, non-public, personal, or proprietary information should not be shared with generative AI tools. This includes information relating to:

- Specific individuals,
- HomeServe Limited and all subsidiary businesses, including our clients, vendors, investors, counterparties or investee companies, and
- Information protected by trademark or copyright.

Notwithstanding the foregoing, confidential, non-public, private and/or proprietary information can be shared with generative AI tools that have been explicitly approved and made available for confidential internal use through the relevant forum for each Group Company, subject to such guidelines and/or policies as may be prescribed. Additionally, any output from a generative AI tool, including a version of an AI tool that has been approved for confidential internal use by each Group Company should be carefully reviewed and evaluated for its quality and accuracy. HomeServe and its employees remain responsible for the quality and accuracy of their work, including any judgments or decision making.

For more information, please refer to the Group AI Policy.

## PERSONAL DATA AND PRIVACY

We are committed to protecting the privacy and security of personal data and complying with all laws and regulations that apply. This will help us to create an environment of confidence and trust that encourages people to share their personal information with HomeServe, be they employees, customers, or business partners.

We collect personal data from individuals both inside and outside our Company, provided we have a lawful reason to do so. This is necessary for us to effectively manage and administer our business. Personal data among other things includes consumer and employee personally identifiable information (such as name, address, phone number, financial information, and other details), as well as sensitive personal, medical, and financial information about our employees.

We must ensure that personal data is kept confidential and only accessed by those within the Company who need it for their role. If we need to disclose personal data to a third party (such as for providing services or acquiring an asset or business), we must comply with applicable legal and regulatory requirements. This may include ensuring that the third party is subject to a written agreement with confidentiality obligations and other necessary obligations under data protection laws of certain jurisdictions where we operate or have customers. In all other cases, we may only disclose personal data in accordance with applicable laws or regulations.

It is your responsibility to understand and comply with our data protection/privacy policies. For more information, please refer to the Group Data Protection Policy.

## DO THE RIGHT THING

- Only collect, process, use, disclose or store personal data if there is a legitimate business purpose for doing so, and ensure the reason is explained in full to the relevant individual.
- Make yourself aware of and follow HomeServe's data protection policies which set out how personal data should be classified, collected, processed, used, disclosed, stored, transferred, and deleted.

For more information, read the Group Data Protection Policy.

## FAQs

- Q. I was in the office late one night and found some payroll details on the printer. What should I do?**
- A.** You should destroy the information you discovered and make your manager aware of the issue.

## DOCUMENT RETENTION

As a part of our business operations at HomeServe, we routinely hold customers' and employees' financial and personal data. We are committed to protecting an individual's right to data privacy and follow all requirements and industry standards, such as the General Data Protection Regulations (GDPR) and the Payment Cardholder Industry Data Security Standard (PCI DSS). Accordingly, we have systems and processes in place that are compliant with industry standards to protect individual's data.

To help our business run smoothly and stay compliant with legal and regulatory requirements, we need your help to preserve our business records and follow our document retention policies. If you receive notification that your documents are relevant to a legal or regulatory matter, please follow the guidance from your legal team or Group Director of Data Protection about how to retain those documents.

It is important to keep our records accurate so that we can create reliable financial statements. Please be honest and transparent with your fellow employees, colleagues, management, and internal teams who review our processes, procedures, and records. You must not hide any information from external or internal auditors.

Remember that some of our parent companies are public companies and consequently there may be certain public disclosure requirements that could affect the way we do business. Employees must be aware of and report any of the following: (a) fraud or deliberate errors in the preparation, maintenance, evaluation, review or audit of any financial statement or financial record; (b) deficiencies in, or non compliance with, internal accounting controls; (c) misrepresentations or false statements in any public disclosure document, such as annual and quarterly reports,

prospectuses, information/proxy circulars and press releases; or (d) deviations from full, true and plain reporting of the Company's financial condition. Consequently, it is **VERY IMPORTANT** that you immediately report any type of financial fraud.

Additionally, each person who is in a financial reporting oversight role, and their Family Members<sup>1</sup> are prohibited from obtaining any tax or other services from the external auditor, irrespective of whether the Company or such person pays for the services.

## DO THE RIGHT THING

- Make yourself aware of and comply with all HomeServe data privacy systems and processes.

## FAQs

- Q. I was tidying up a cupboard and found an old CV from four years ago. What should I do with it?
- A. Check with your local data protection officer. There are specific regulations which set out what you should do with different documents after different periods of time, and your data protection officer will be able to guide you based on these.

<sup>1</sup> For the purposes of this Code, "Family Members" are your spouse, partner or other family members who live in the same dwelling as you.

## COMPANY PROPERTY

HomeServe entrusts its people with Company assets, such as cash, software, and trade secrets. These assets are shared to help us operate and are given to employees with a great deal of trust under the expectation that care will be taken to avoid damage. Such assets should therefore only be used for business purposes and should not be used for personal gain.

It is your responsibility to protect these assets from loss, damage, theft, misuse, or waste. If you notice any issues related to the Company's assets or have any questions about their proper use, you should first speak with your manager/supervisor. If you are uncomfortable doing so, you may use the Company's anonymous reporting helpline.

The Company's name (including its corporate letterhead and logo), facilities, and relationships are important assets that should only be used for authorised business. It is not acceptable to use these assets for personal benefit or to waste them. If you misuse the Company's assets, you may be in violation of your duty to us. Additionally, you should not abuse our financial resources. Any requests for reimbursement or use of our corporate credit cards should be for legitimate business expenses only.

You must complete mandatory data protection training and mitigate cybersecurity risks by being vigilant about opening attachments or clicking on links.

Company assets include but are not limited to employees' or workers' time, materials (including stationery or spare parts), cash, software, trade secrets, and confidential information.

## DO THE RIGHT THING

- Use Company assets for the purpose they were given, unless expressly permitted by your local Chief Executive.
- Do not steal or misuse any HomeServe property.
- Familiarise yourself with your service contract to understand the approved use of confidential information and other intellectual property.

## FAQs

**Q. Can I use my HomeServe email for sending personal emails?**

A. You may send the occasional personal email from your work account, but you should remember that all HomeServe email may be monitored.

**Q. I have noticed that one of my colleagues is taking plumbing spare parts that are left over after a job has been completed home at the end of the day. What should I do?**

A. This is theft, and you should report this to your manager immediately.

## INSIDER DEALING AND MARKET ABUSE

All HomeServe employees must be mindful of the laws on insider dealing, and their duty of confidentiality to the Company and related companies. Insider dealing is a criminal offence and could also have a detrimental effect on our reputation.

### DO THE RIGHT THING

- Think carefully before buying or selling Brookfield securities and do not deal if you have access to or are aware of material non-public information about Brookfield Asset Management.
- Seek advice from the Group CFO or Group Legal Counsel if you have any concerns.

## INTELLECTUAL PROPERTY

As an employee, you may participate in the creation, development, or invention of intellectual property (which includes confidential information, trade secrets, concepts, methods, processes, physical products, plans, ideas, programs, software, applications, code, works of authorship, trademarks, service marks, and designs), either alone or in collaboration with others. This may also include improving upon the Company's existing intellectual property. All intellectual property created during your employment, including any associated rights, will be owned by the Company, and you will waive your rights to such intellectual property. It is your responsibility to work with the Company and provide any necessary assistance, including preparing and executing any required documentation (such as applications and assignments for registering rights with relevant government authorities), to ensure that all intellectual property and related rights become the exclusive property of the Company.





## PEOPLE AND ENVIRONMENTS

**We are committed to caring for our customers, people, and communities. At HomeServe we expect our people to treat others, and the environments in which we operate, with dignity, respect, and fairness.**



## EQUAL OPPORTUNITIES, INCLUSION AND DIVERSITY

HomeServe is an equal opportunities employer. We are committed to creating a fair, equitable and diverse culture. Our practices are designed to promote fair and equitable treatment and build an environment that is free from harassment, intimidation, and discrimination of any kind. We do not tolerate any form of harassment, violence or discrimination in the workplace. Everyone is expected to work together to ensure that our workplace is safe, respectful, and free from these behaviors.

Full and fair consideration will be given to applications for employment from and the career development of people affected by a disability or a long-term condition. In addition, HomeServe will take all practical steps to ensure that colleagues who become disabled or suffer from a long-term condition during the time they are employed by the Group are able to continue to perform their duties.

## DO THE RIGHT THING

- Treat your colleagues, and others you interact with, with respect and dignity.
- Promote and work to enable equal opportunities in every aspect of your work.
- Celebrate diversity, and report harassment, intimidation, and discrimination.

## FAQs

**Q. My manager wants the team to perform well but they can sometimes be intimidating, and this is causing stress for the team. What should I do?**

**A.** Intimidating behaviour is not acceptable. If you don't feel able to discuss this with your manager, contact your local HR representative or your manager's manager. We will ensure that there are no reprisals for raising the issue.

**Q. Due to a long-term condition or disability I feel that I need additional support or equipment to do my role – what should I do?**

**A.** You should first approach your Line Manager and explain your circumstances. Your manager will be able to look at what reasonable adjustments can be made to support you and refer you to your local Health & Safety team or Occupational Health if necessary.

**Q. How can I report discrimination, violence and/or harassment?**

**A.** Discrimination is not acceptable, and we want HomeServe to be a Company where people can be themselves. We encourage you to report any incidents of discrimination, violence, or harassment that they experience or witness in the workplace. Reporting is essential for us to establish and maintain a work environment that fosters productive working relationships and mutual respect among employees. We want to ensure that our workplace is safe and respectful for everyone. If you make a report in good faith or assist in an investigation, you will not face retaliation. However, please note that making a false accusation about an innocent party is not acceptable and may result in corrective action. For more information speak your local HR department who will be able to provide guidance on this process.

## HUMAN RIGHTS AND MODERN SLAVERY

We are committed to conducting our activities in an ethical and responsible manner that respects and supports the protection of human rights.

- We take a strong stance against discrimination, child and forced labour, and harassment or abuse in the workplace. We embed these standards into all of our core business activities, including training, communications, contracts, and due diligence processes as appropriate. We also extend these practices to our interactions with our key suppliers and other business partners.
- We expect all of our people to treat others as they would like to be treated themselves – with respect and dignity. Human rights are a minimum standard of how we should treat others, and we encourage our people to be active in fostering a culture of respect and equality for all.

We do not tolerate human rights violations, including modern slavery, in our business, or by any of our business partners. Any such violations will be investigated and addressed accordingly. To learn more about our commitment to human rights and our efforts to safeguard against modern slavery please refer to our Modern Slavery statement which is available on our website.

Some of our businesses are subject to specific local Modern Slavery laws. You should check with your local HR or legal team if you have any questions.

## DO THE RIGHT THING

- Treat others as you would like to be treated.
- If you see someone violating human rights, report them to your Line Manager, HR director or local Chief Executive.
- Read our Modern Slavery Statement, which is available on our website.

## FAQs

Q. I work in payroll and noticed that the bank details we have for paying one of our employees do not seem to be the employee's own. I am concerned that their wages are being sent to someone who is not them, and that this might be a form of slave labour. What should I do?

A. Report this to your Line Manager, who might need to escalate this further.

## CONVICTIONS

The reputation of our Company depends on the people who work for us. Where appropriate, our recruitment processes will include background checks, to ensure that our people are fit to perform their job effectively. Once you start working with us, we expect you to maintain high standards of integrity, honesty, and openness. If at any point during your employment you are convicted of a crime which is in contravention of the standards for your role, or if you engage in any behavior that could negatively impact our reputation, it is your responsibility to report this information to your Line Manager/HR Representative so that we can determine if it affects your role requirements.

## RECRUITMENT OF EMPLOYEES FROM COMPETITOR ORGANISATIONS

It is important that we do not try to recruit any individuals from competitor organisations in a way that may open us up to legal action. The risk is, that in certain situations, it may appear that HomeServe is trying to obtain confidential information or an unfair advantage by hiring certain individuals from competitor organisations.

### DO THE RIGHT THING

- Do not attempt to engage in or attempt to recruit an employee in a way that could open HomeServe up to legal action.
- Abide by any legally enforceable restriction placed on a potential recruit, whether that be from the terms of the potential recruit's contract of employment or otherwise.
- Do not seek to receive any confidential and commercially sensitive information from potential recruits.
- If in any doubt, always seek the advice of your local HR and legal teams.

## FAQs

**Q. A colleague of mine used to work for a competitor and they have still got some information about their business and have offered to share it with the team. What should I do?**

**A. You should tell your colleague that they should not share any information they acquired from their previous employer with the team, and you should make your manager aware of the issue.**



## HEALTH AND SAFETY

The health and safety of our employees is a top priority. HomeServe is committed to building a safe workplace for all employees, contractors, and the community in which we operate. To achieve this, we strictly comply with all occupational health and safety laws and internal procedures. We work to create a culture that motivates and supports our people in their efforts to achieve zero work-related injuries and illnesses.

Overall responsibility for health and safety rests with the HomeServe Board. Management teams within each of our businesses carry out the necessary arrangements to facilitate our health and safety practices and every individual in HomeServe is responsible for acting with their safety, and the safety of others, in mind. We must all play our part to keep each other safe.

You must;

- Follow all laws and internal procedures related to occupational health and safety strictly.
- Refrain from engaging in any illegal or hazardous activities, including threats or acts of violence.
- Do not have or distribute illegal drugs or alcohol, or be under their influence, while on Company premises or during work-related activities.
- Unless it is part of your job duties, you must not have or use any weapons, dangerous goods or combustible materials while in the Company's facilities or during Company-sponsored events.

## DO THE RIGHT THING

- Report any near misses, accidents, injuries, unsafe working conditions, or unlawful conduct including threatening behaviour and violence to your manager or to your local health and safety representative.
- Make yourself aware of and follow all HomeServe health and safety standards.

## FAQs

**Q. I sit down all day at work and I'm struggling with back pain. What can I do about this?**

**A.** In the first instance speak to your Line Manager. They will assist you to do an assessment of your working arrangement and see if improvements can be made.

**Q. I don't have all the right safety equipment on my van. What should I do?**

**A.** You should speak to your manager as a matter of urgency – we need to do everything we can to keep our employees and customers safe. If you don't get what you need, you should escalate your concerns to your local health and safety representative.

## THE ENVIRONMENT

We are committed to making our house greener, and helping our customers to do the same. The management of our environmental impact as a business and the products we offer is key to our future growth. It is important to our stakeholders, and in supporting the fight against climate change.

As a business we are committed to adopting environmental best practice, implementing environmental management systems to achieve our carbon reduction targets, and supporting international sustainability efforts.

### DO THE RIGHT THING

- Embrace environmental initiatives and activity.
- Question unsustainable activities in your line of work and look to find greener alternatives.
- Report any environmental risks and hazards promptly.



## FAQs

Q. Many of the people in my office don't follow the environmental initiatives that are in place. I don't want to be the person who tells people off, but I would like to encourage everyone to do the right thing. What can I do?

A. Talk to your local office manager. They can put up signs, or send out a note to everyone to remind them of the environmental practices we have in place.

Q. There are no recycling facilities in our office. I care about the environment and feel that this is something that should be changed. How can I go about getting this sorted?

A. Speak to your Line Manager or local facilities manager, who will be able to install recycling facilities. At HomeServe we always strive to be as environmentally friendly as possible, so if there is an initiative you think we should be acting on, get in touch with your local facilities manager to see if it is possible to implement.

## SEEKING ADVICE OR **RAISING A CONCERN**

HomeServe has an open-door policy, and we encourage our employees to seek guidance if they have any doubts or concerns, no matter how big or small. It is the responsibility of every employee to speak up about any wrong doing or concerning behaviour. Reports of concern will remain confidential to the fullest extent possible and HomeServe has a zero-tolerance policy for retaliation against those who report concerns.

We take reports of suspected violations of the Code or any law or regulation seriously and want our employees to feel safe and comfortable reporting any concerns they may have. Retaliation against individuals who report suspected violations is strictly prohibited. However, we also expect our employees to provide truthful information and refrain from making knowingly false accusations. Failure to do so may result in disciplinary action, up to and including termination.

In the event that you believe that you have experienced retaliation for reporting a suspected violation, you are encouraged to raise the concern with your Line Manager, director or legal team. If, for whatever reason, you feel you cannot talk to them or, if you feel your concerns have not been addressed appropriately you should contact the reporting helpline. We are committed to fostering a culture of transparency and accountability, and we appreciate the courage and integrity of those who come forward to report potential violations.

### REPORTING HELPLINE

*Online* or by telephone as follows:

<b>United Kingdom</b>	<b>0808 189 1053</b>
<b>France</b>	<b>0805 080339</b>
<b>Spain</b>	<b>900 905460</b>
<b>Germany</b>	<b>0800 181 2396</b>
<b>Japan</b>	<b>0800 170 5621</b>
<b>United States</b>	<b>800 461 9330</b>

Other local numbers are available online.

The helpline is a confidential service provided for HomeServe by an independent organisation called Convercent.



## OTHER

- We take compliance with our Code seriously and don't provide waivers for anyone unless the waiver is specifically approved by the CEO and General Counsel. Our Board of Directors regularly reviews and approves the Code, with the ultimate responsibility of ensuring compliance. However, please understand that changes may be necessary, and we reserve the right to adjust, suspend, or withdraw the Code and its associated policies, processes, and programmes at any time. We will notify you of any changes made to the Code.
- The Code and policies referred to do not create any entitlements, privileges, or benefits for employees, establish employment terms, or create any express or implied contracts between employees and the Company. It is important to understand that the Code does not alter your employment relationship with the Company.
- As a global Company, we do business in multiple jurisdictions and are committed to complying with applicable laws. If any section of our Code conflicts with applicable law, we will comply with the law. Our Code is always available on our intranet, and any version posted online supersedes any paper copies.

