

HomeServe Limited International Whistleblowing Policy

1. About this policy

HomeServe is committed to conducting business with high standards of professionalism and integrity. It is important to us that any wrongdoing at work is reported and properly dealt with. Often the first people to know of any possible wrongdoing will be those who work in or for HomeServe. You may, however, feel that you cannot raise concerns because this would be disloyal to your colleagues or HomeServe, or out of fear of retaliation. This policy reflects our commitment that any genuine concerns you have in relation to wrongdoing at work and raised under this policy will be taken seriously and dealt with appropriately.

The aims of this policy are to:

- Encourage you to report any genuine concerns about wrongdoing at work (see more detail on what that means in paragraph 3) as soon as possible
- Provide guidance on how to report any wrongdoing and how such concerns will be dealt with
- Demonstrate that we are serious about addressing any genuine concerns about wrongdoing and that we will support any individuals who raise such concerns within the terms of this policy
- Make it clear that HomeServe will not tolerate the detrimental treatment of anyone who raises genuine concerns about wrongdoing, even if it turns out that those concerns were misplaced.

This policy should not be used for complaints relating to your own personal circumstances, for example if you believe that you are being bullied or discriminated against or that the terms of your contract have been breached. These concerns should be raised under the HomeServe grievance/complaints procedure that applies in your country of work.

This policy is non-contractual. We may change all or any part of this policy in any way at any time (subject to applicable law in your country of work) and while it sets out our likely response to disclosures, it does not commit HomeServe to responding in a particular way.

2. Who does the policy apply to?

This policy applies to anyone who works in or for HomeServe, including but not limited to: current and former employees; workers (including agency workers, homeworkers, freelancers, contractors etc.), non-executive directors and consultants, student workers and interns. It also applies to volunteers and people to whom anyone raising a concern through this policy is connected for the purpose of raising the concern.

While this policy applies across all countries where HomeServe operates, we recognise that local laws or practices may at times require us to adopt a different approach. You should refer to Appendix 2, which sets out any amendments or exceptions that apply in your country.

3. What types of concern should be raised under this policy?

If you have genuine concerns that wrongdoing is taking place at work (or has taken or is likely to take place), you should raise them under this policy. “Wrongdoing” may include but is not limited to:

Criminal activity

- Failure to comply with any legal, professional or regulatory obligation, for example:
 - data protection and privacy laws, and security of network and information systems;
 - consumer protection and financial regulations that apply to HomeServe (including prevention of money laundering and terrorist financing)
- Danger to health and safety, including:
 - product safety and product conformity;
 - transport safety
 - radiation protection and nuclear safety
 - food and feed safety, animal health and animal welfare;
 - public health;
- Damage to the environment
- Bribery/facilitating tax evasion
- Public procurement
- The deliberate concealment of any of the above.

Concerns may also relate to infringements affecting the financial interests of the European Union or infringements relating to the internal market of the European Union, including infringements of Union rules on competition and state aid.

If you are unsure about whether any suspected wrongdoing is covered by this policy, speak to the Assurance & Risk Director, whose contact details are as follows: Julian.Woolley@Homeserveplc.com.

4. How to raise a concern

You should normally raise any concerns about wrongdoing at work with your immediate manager or director in the first instance. If you do not feel confident about doing so (for example, because you believe the manager or director may be involved) or where concerns have been raised already with the line manager or director, but you do not believe they have been addressed, you may raise a formal report by contacting the confidential reporting hotline:

<https://app.convercent.com/en-US/LandingPage/28f0d341-f651-eb11-a97c-000d3ab9f062>

or by telephone as follows:

Belgium	0800 260 39
France	0805 080339
Germany	0800 181 2396
Italy	800 727 406
Japan	0800 170 5621
Spain	900 905460
Portugal	800 180 367
United Kingdom	0808 189 1053
United States	800 461 9330

Other local numbers are available online at <https://app.convercent.com/en-US/LandingPage/28f0d341-f651-eb11-a97c-000d3ab9f062>

The hotline is a confidential service provided for HomeServe by an independent organisation called Convercent. Convercent is able to receive confidential and anonymous calls.

The confidentiality of any concern you raise will be maintained to the fullest extent possible, consistent with our need to conduct an adequate review and subject to the law that applies in your country of work.

Where concerns are raised through Convercent, they will be passed to an appropriate and authorised person within HomeServe, Julian Woolley, Homeserve's Assurance & Risk Director. To the extent applicable, Appendix 2 will mention the person within your local organisation who may also be charged to investigate your report, should you opt for a local investigation. The person whom Convercent sends the report to, will acknowledge your concern within seven days after receipt by Convercent and will arrange for an initial confidential interview with you to discuss the areas of concern. You will be asked to provide as much information and supporting detail as you can in relation to the disclosure being made. Failure to do this may hinder any subsequent investigation and raise doubts about the genuineness of your belief in that disclosure.

If you wish, you can bring a work colleague or union representative to any meetings under this policy, on condition that person agrees to keep the matter confidential.

Depending on the nature of the concerns raised, an investigator or team of investigators may be appointed to investigate your concerns under the supervision of the Assurance & Risk Director. We will aim to keep you informed of the progress of any investigation and the final outcome.

We will provide you with feedback on your concern within three months of your first raising it, normally much sooner. Examples of feedback include closure of the case based on a lack of sufficient evidence, the launch of a full investigation and measures taken to address the concern raised.

While HomeServe will give as much feedback as it properly can, due to the legal obligations of confidentiality it owes to other employees, it will not usually be possible for us to provide detailed feedback on the outcome of any disciplinary action taken

against another employee or where our response may be commercially sensitive. You should treat any information about the investigation as confidential.

If you raise a genuine concern in accordance with this policy, you (and anyone connected with your raising of the concern) will be protected against detrimental treatment imposed as a result of raising it. However, doing so does not give you any right to be involved in any investigation that takes place as a result, nor does it give you the right to dictate any particular remedy or response, whether or not your concern is found to be genuine.

If you are not satisfied with the way in which your concern was dealt with, you may contact the Company Secretary: Anna.Maughan@Homeserveplc.com.

If you raise or repeat a concern which you know is false you may be subject to disciplinary action or dismissal.

5. Anonymous complaints

While you can submit a report anonymously, we would prefer you not to raise concerns anonymously, as this makes it difficult for us to investigate them. If you have any concerns about identifying yourself or any person who is associated with your raising of the concern, you should speak to the Assurance & Risk Director. We will seek to accommodate any requests for anonymity as far as practicable and your anonymity will be protected to the fullest extent possible according to the law in the country in which you work. For example, it may not be possible to preserve your anonymity where the concern that you raise becomes the subject of a criminal prosecution. In any event, your identity will not be disclosed without your explicit consent to anyone beyond those dealing with the report, unless this is a necessary and proportionate obligation, imposed by law, in the context of the investigation.

6. Raising concerns externally

HomeServe encourages you to first raise any concerns about wrongdoing at work internally under this policy, but we recognise that it may occasionally be appropriate for you to contact an external body such as a regulator where the complaint has been raised internally but ignored or where there has been a recurrence of the same wrongdoing.

We strongly recommend that you seek advice before raising any concerns externally so as to understand the proper forum for doing so and to make sure that any disclosure of confidential information is made in accordance with applicable law.

If you work in or for HML, you should pay particular regard to Appendix 1 of this policy.

7. Protection from detrimental treatment

We will not tolerate any detrimental treatment (including but not limited to dismissal, disciplinary action, demotion, transfers, salary cuts, threats or other unfavourable treatment) of individuals because they have raised (or are associated with the raising of) a genuine concern under this policy or participated in an investigation into a concern. HomeServe will treat any such detrimental treatment as a disciplinary matter, which might lead to dismissal. However, nothing in this policy means that someone who has raised a concern under it cannot be managed (monitored, directed, disciplined,

dismissed, etc.) in the ordinary course of the employment relationship for reasons unrelated to making a complaint.

If you believe you have suffered detrimental treatment for having raised genuine concerns about wrongdoing at work or for having participated in an investigation into potential wrongdoing under this policy, you should raise a complaint under the HomeServe grievance/complaints procedure that applies in your country of work. To help us deal with any concerns, it would be helpful if you could identify the concern raised and how it was raised, and also the specifics of the treatment which you believe has resulted from your doing so.

HomeServe will take all complaints seriously and seek to deal with them promptly. If your complaint is upheld, you will be notified (normally within three months from the date you make the complaint). The details of any action taken against the perpetrator as a result are usually confidential as between him/her and HomeServe. Alternatively, we may request that you participate in addressing the matter via a mediation or similar process, to the extent permissible in your country of work.

Any personal data that relates to the raising of a concern under this Policy will be retained and managed in accordance with the Group's Data Protection Policy, the Group Data Protection Framework, the Group Data Retention Policy and any other policies relating to the management of personal data in the business in which you work.

8. Responsibility for the policy

The Board of HomeServe Limited has overall responsibility for this policy and the Assurance & Risk Director has day-to-day responsibility for it. The Group General Counsel is responsible for ensuring that the Policy is kept updated. This policy will be reviewed periodically.

Appendix 1

This appendix applies to HomeServe Membership Limited (HML).

HML is authorised and regulated by the Financial Conduct Authority (FCA) and therefore has a duty to comply with the FCA, Senior Management Arrangements, Systems and Controls (SYSC) sourcebook: SYSC 18 in addition to complying with prevailing legal requirements.

More information: <https://www.fca.org.uk/firms/whistleblowing>.

In addition to the arrangements set out in the above Whistleblowing Policy, HML will maintain internal procedures to escalate reportable concerns, where appropriate, to the FCA.

Anne Torry, an Independent Non-Executive Director of HML, has been appointed as Whistleblowers' Champion.

Appendix 2

Amendments or exceptions by country

Belgium

Section 4

Any concerns raised through the confidential reporting hotline will be passed to the following authorised individual, who will be bound by an obligation of confidentiality: Julian Woolley, Assurance & Risk Director.

Canada

No applicable amendments or exceptions.

France

French employees can also obtain free information on whether and how to raise a concern via the helpline run by the Defender of Rights ("*Défenseur des droits*"):

<https://www.defenseurdesdroits.fr>

(tel: 09 69 39 00 00)

Section 4

You will need to put your concern in writing, including all the relevant facts, so that the person assigned can investigate. If you disclose your identity, this will be treated confidentially.

If no wrongdoing is established, all records that might enable you or the other people involved to be identified will be destroyed within two months after the investigation is closed. You and the people involved in the concern will be informed when the investigation is closed.

Italy

Section 4

Any concerns about wrongdoing at work should be raised through the confidential reporting hotline in the first instance and not to your immediate manager or director.

Section 5

Should you decide to raise concerns through the confidential reporting hotline without disclosing your identity, we will ensure that appropriate measures are in place to ensure your anonymity.

Section 7

If you believe that you have suffered detrimental treatment because you have raised a concern, the matter may be referred to the National Labour Inspectorate, if that matter falls within its legal competence. This is in addition to any action that you and your trade union may take.

Germany

Section 3

Criminal activity, includes in particular:

- Fraud and corruption
- Injury of “life and limb”

Concerns may also relate to violations of the provisions of general individual and collective labour law.

Section 4

HomeServe will investigate your concern through an internal reporting office in Germany.

Section 6

You may raise your concern via the hotline as outlined in this Policy or via an external reporting channel.

You are free to decide whether you want to submit a report to the company's internal reporting hotline or use an external reporting channel. An external reporting channel has been set up at the Federal Office of Justice as an equivalent option for submitting reports (sec. 19 HinSchG). The tasks of this external reporting office shall be carried out independently besides the other tasks of the BfJ. In addition, the German Government intends to establish further external reporting offices. Details on this are not available at the time of writing this Policy.

Japan

Section 2

The policy will also apply to auditors and former employees who make a complaint within 12 months of leaving HomeServe.

Section 3

“Wrongdoing” will also include:

- violations of administrative penalties, recommendations or orders; and
- conduct that may result in administrative punishment from regulators or authorities.

Portugal

No applicable amendments or exceptions.

Spain

Section 5

HomeServe guarantees to treat the concerns raised under this policy as confidential, with regard to both the information received and the identities of the parties.

Should you decide to raise concerns through the confidential reporting hotline without disclosing your identity, we will ensure that appropriate measures are in place to ensure your anonymity.

Any concerns raised through the confidential reporting hotline will be passed to the following authorised individual, who will be bound by an obligation of confidentiality: Julian Woolley, Assurance & Risk Director.

United Kingdom

UK employees can also obtain free confidential advice on whether and how to raise a concern via the helpline run by the independent whistleblowing charity Protect:

www.protect-advice.org.uk

020 3117 2520

USA

No applicable amendments or exceptions.