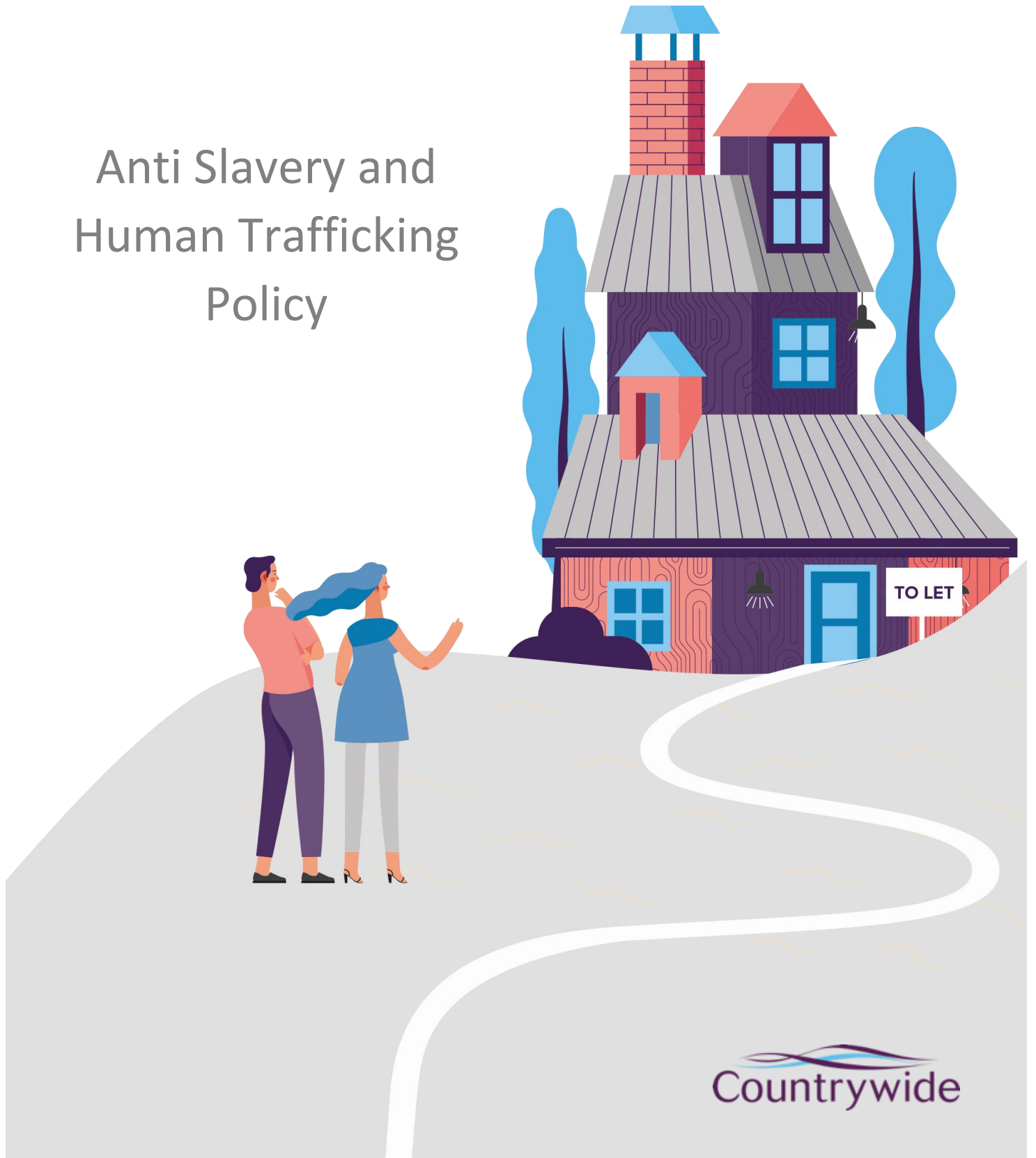


Anti Slavery and Human Trafficking Policy





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Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors,

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suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and we expect that our suppliers will hold their own suppliers to the same high standards.

This Policy outlines the principles and minimum control standards expected by us and should be read in conjunction with the Group Legal Policy (POL-CWG-005).

Who does this apply to?

This policy applies to all colleagues across the Countrywide Group including contractors and self-employed individuals in relation to service they provide to, for or on behalf of the Countrywide Group in any capacity (including colleagues at all levels, directors, officers, agency workers, seconded workers, volunteer interns, agents, contractors, external consultants and third part representatives). It's a guide and doesn't form part of your contract.

Responsibilities

The Board of Directors of Countrywide plc has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Financial Officer has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

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Guiding Principles

The Modern Slavery Act 2015 (the Act) is consistent with the principles established in the Countrywide Group Legal Policy and on the Countrywide Promise contained within our Code of Conduct:

“We will put Our Values at the heart of everything we do”

The way Our Values relate to anti-slavery and human trafficking is set out below:

Our Values	Aspect	What Our Promise means for Us
Responsible	We do the right thing	We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
Straightforward	We keep it simple	We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Application

The Act extends to England and Wales, however in accordance with Our Values, this policy is applicable to all Group businesses.

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Modern Slavery and Trafficking Risk

A risk can be defined as something which may or may not happen (i.e. the possibility of an uncertain outcome), which if it did, could lead expected outcomes to vary, and where that became a negative outcome would result in an adverse impact on the achievement of business objectives.

Modern Slavery takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common coercive, abusive and exploitative working practices and the deprivation of a person's liberty (adults or children) by another in order to exploit them for personal or commercial gain.

The sources of modern slavery risk include (but are not limited to):

- Any part of our business;
- Supply chains; and
- Customers.

The Anti-Slavery and Human Trafficking Policy falls within the Legal and Regulatory risk category of the Countrywide risk framework.

Anti-Slavery Risk Management Principles

The Group seeks to manage its exposure to modern slavery risks by establishing control standards and supporting practices/procedures that align with agreed principles. The principles are specified with reference to each of the following categories:

Risk Area	Principles
Roles and responsibilities	You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
Awareness and training	Appropriate training is provided for all colleagues. Requirements are also communicated to suppliers/contractors via the Group's Supplier Code of Conduct.
Supply chains	Our zero-tolerance approach and appropriate anti-slavery obligations to be imposed on Countrywide's supply chain, implemented through a supplier code of conduct and behaviours.
Risk assessment	Business Units must carry-out an annual risk assessment.
Disclosure and reporting	Breaches or potential breaches must be notified to management at the earliest opportunity. Countrywide plc issues an annual statement pursuant to section 54(1) of the Act.

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Access to Legal expertise	Queries are referred to Group Legal as required.
Governance	Management have visibility and oversight of modern slavery risks.

Minimum Control Standards

A Control Standard is an activity which must be in place in order to manage the risk areas defined in the table below. A minimum set of control standards, covering a range of directive, preventative, detective, corrective and limiting controls ensure that, where they operate effectively, risk is managed to an acceptable level.

Where applicable, the Business Unit or central function needs to demonstrate compliance with the minimum control standards set out in the table below:

Risk Area	MCS
Roles and responsibilities	See the 'Responsibilities' paragraph on p.3 of this document. NB This policy does not form part of any colleague's contract of employment and it may be amended at any time.
Awareness and training	Appropriate training is provided for all colleagues. Requirements are also communicated to suppliers/contractors via the Group's Supplier Code of Conduct.
Supply chains	Appropriate anti-slavery obligations to be imposed on Countrywide's supply chain, implemented through a Supplier Code of Conduct and behaviours.
Risk assessment	Business Units must carry-out an annual risk assessment and submit these to the Group Policy Owner, together with any action plans to reduce exposure.
Breach	Breach by: <ul style="list-style-type: none"> • A colleague may result in disciplinary action; and • A supplier/contractor will result in termination of the business relationship.

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Disclosure and Reporting	<p>Colleagues must notify their line manager or Employee Relations Specialist, or utilise the whistleblowing helpline if a breach of this policy has occurred, or may occur in the future, or if you are unsure about whether a particular act or the treatment of workers more generally, constitutes a breach of this policy. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.</p>
Access to Legal expertise	<p>There is a designated in-house Legal point-of-contact for queries about The Modern Slavery Act 2015, in particular, whether a particular act or treatment of workers constitutes a breach of this policy.</p>
Governance	<p>Business units and group functions report breaches (or suspected breaches) of this policy through the incident reporting process to the Group Risk and Compliance Committee, chaired by the Enterprise Risk Director. These breaches (or confirmation that there have been no breaches), are disclosed in the Group statement pursuant to section 54(1) of the Modern Slavery Act 2015 and published on the Group’s website.</p>

Applying for policy waivers

No waivers or exceptions to this policy are permitted.

Version Control

Version	Approved By	Date
1.0	Executive Risk Committee	8 February 2017

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1.1	Group Risk and Compliance Committee	26 January 2021
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Ownership and Confidentiality

This document should not be shared with any other third party without the written consent of Countrywide PLC. This policy and any associated documentation remains the property of Countrywide PLC and should be returned if requested.

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