

Anti-Bribery and Corruption Policy

What does our policy cover?

This Policy exists to set out the responsibilities of Purplebricks Group plc and its group companies ("Purplebricks") and those who work for, or are engaged by, us in observing and upholding our zero-tolerance position on bribery and corruption. It also exists to act as a source of information and guidance for those working for or engaged by Purplebricks. It helps them recognise and deal with bribery and corruption issues, as well as to understand their responsibilities.

Policy statement

Purplebricks is committed to conducting business in an ethical and honest manner and is committed to implementing this Policy to ensure bribery is prevented. Purplebricks has a zero-tolerance approach to bribery and corrupt activities. We are committed to acting professionally, fairly and with integrity in all business dealings and relationships wherever we operate. Purplebricks will constantly uphold all laws relating to anti-bribery and corruption in all jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, regarding our conduct both at home and abroad. Purplebricks recognises that bribery and corruption are punishable by up to 10 years imprisonment and a fine. If Purplebricks is discovered to have taken part in corrupt activities, we may be subject to an unlimited fine and face serious reputational damage. We are committed to the prevention of bribery and corruption in our business and take our legal responsibilities seriously.

Who is covered by the policy?

This Policy applies to all employees (whether temporary, fixed term or permanent), Local Property and Lettings Experts (LPE/LLEs) (and any of their employees), Local Real Estate Experts (LREEs), Academy Members, Viewing Assistants, Sales Associates, Territory Managers, consultants, contractors, agency staff, agents or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees no matter where they are located (within or outside the UK). The Policy also applies to Officers and Board members. In the context of this Policy, third party refers to any individual or organisation our business meets and works with. It refers to actual and potential customers, suppliers, distributors, business contacts, agents, advisers and government/public bodies. This includes their advisors, representatives and officials, politicians and public parties.

Definition of bribery

Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting or soliciting something of value or of an advantage to induce or influence an action or decision. A bribe refers to any inducement, reward, or object/item of value offered to another individual to gain commercial, contractual, regulatory or personal advantage. Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law. Bribery is illegal. All parties covered by this Policy must not engage in any form of bribery. They must not accept bribes in any degree and if uncertain about whether something is a bribe or act of hospitality, they must seek advice from our General Counsel (steve.thompson@purplebricks.com).



What is and what is not acceptable

Gifts and hospitality

Purplebricks accepts normal and appropriate gestures of hospitality and goodwill (whether given to or received from third parties) where the following requirements are met:

- a. It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or business advantage. Nor as an explicit or implicit exchange for favours or benefits;
- b. It is not made with the suggestion that a return favour is expected;
- c. It complies with the local law;
- d. It is given in the name of the business not in the name of an individual;
- e. It does not include cash or equivalent (e.g. a voucher);
- f. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or other religious festival or as a small thank you to a business for helping with a large project upon completion);
- g. It is of an appropriate type and value, given at an appropriate time considering the reason for the gift;
- h. It is given/received openly not in secret;
- i. It is not selectively given to a key influential person with the intention of directly influencing them;
- j. It is not above a value of £50 with the exception of Board Members where the limit is £250;
- k. It is not an offer to or accepted from a government official, representative, politician or political party without the prior approval of the General Counsel.

All gifts, except those with a nominal value (e.g. plastic pens, keyrings etc) must be declared to the General Counsel but it is only those gifts and hospitality that do not comply with a) – k) above that require approval from the General Counsel prior to acceptance or giving.

Where it is inappropriate to decline the offer of a gift (e.g. when meeting with an individual of a certain religion/culture who may take offence) the gift may be accepted so long as it is declared to the General Counsel who will assess the circumstances. Purplebricks recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures and religions so definitions of what is acceptable will inevitably differ for each. As good practice, gifts given and received should always be disclosed to the General Counsel. The intention behind a gift being given/received should always be considered. If there is any uncertainty the advice of the General Counsel should be sought.

Facilitation payments and kickbacks

Purplebricks does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made to low level officials with the intention of securing or speeding up the performance of a certain duty or action.

Purplebricks does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

Political and charitable contributions

Purplebricks will not make donations, whether in cash, kind or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

Purplebricks accepts and indeed encourages, the act of donating to charities, whether through services, knowledge, time or direct financial contributions (cash or otherwise) and agrees to disclose all charitable contributions it makes. Those covered by this Policy must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery. Purplebricks will ensure that all charitable donations made are legal and ethical under local laws and practices and that donations are not offered or made without the approval of the General Counsel.



What you must do

You must ensure that you read, understand and comply with the information contained within this Policy and with any training or other anti-bribery and corruption information you are given.

You are equally responsible for the prevention, detection and reporting of bribery and other forms of corruption. You are required to avoid any activities that could lead to or imply a breach of this Policy.

If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future you must notify the General Counsel.

If you breach this Policy you will face disciplinary proceedings and could face immediate dismissal for gross misconduct (if you are an employee) or may have your contract with Purplebricks terminated.

What happens if I need to raise a concern?

How to raise a concern

If you suspect that there is an instance of bribery or corruption you should raise your concerns as soon as possible. If you are uncertain as to whether an act can be considered bribery or corruption you should speak to the General Counsel.

What to do if you are a victim of bribery or corruption

You must tell the General Counsel as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or if you have reason to believe that you are a victim of corrupt activity.

Protection

If you refuse to accept or offer a bribe or you report a concern relating to potential acts of bribery/corruption Purplebricks understands that you may feel worried about potential repercussions. Purplebricks will support anyone who raises concerns in good faith even if an investigation finds they were mistaken.

Purplebricks will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern.

Training and communication

Purplebricks will provide training on this Policy as apart of the induction process for all new employees. Employees will also receive relevant training on how to adhere to this Policy.

Purplebricks' Anti-Bribery and Corruption Policy will be made available to all LPE/LLEs, suppliers, contractors, business partners and third parties at the outset of business relations and as appropriate thereafter.

Record keeping

Purplebricks will keep detailed, accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given. Gifts and acts of hospitality are subject to managerial review.

Monitoring and reviewing

Purplebricks' General Counsel is responsible for monitoring the effectiveness of this Policy and will review the implementation of it on a regular basis to assess its suitability, adequacy and effectiveness.

Any improvements will be applied as soon as possible. Employees are encouraged to offer their feedback on this Policy if they have suggestions on how it may be improved. Feedback of this nature should be addressed to the General Counsel.

Purplebricks may amend this Policy at any time so as to improve its effectiveness at combating bribery and corruption.

