



## **Business Partner Code of Conduct**



## 1. Introduction

HomeServe USA Holding Corp. and its controlled affiliates (collectively, “we,” “us,” “our,” “HomeServe” or the “Company”) are committed to conducting business activities with honesty and integrity and in compliance with applicable legal and regulatory requirements.

We expect anyone that provides goods or services to us (“**Business Partners**”) to adhere, at a minimum, to the same commitments to ethics and compliance as contained in this Business Partner Code of Conduct (“**Code**”), and to have the necessary policies and procedures in place to support such commitments within their supply chain. If you have any questions regarding this Code, please contact your HomeServe representative or [conduct@homeserveusa.com](mailto:conduct@homeserveusa.com).

## 2. Legal and Regulatory Compliance

As we conduct business in the United States and Canada and are subject to the supervision of numerous regulators, we expect all Business Partners to:

- ✓ Understand and comply with applicable laws and regulations.
- ✓ Maintain all appropriate licenses, permits and other regulatory authorizations and requirements necessary to conduct the activities for which they have been retained.

## 3. Environmental, Social and Governance

Our Environmental, Social and Governance principles are embedded throughout our operations to ensure that our business model will remain sustainable. As such, we encourage our Business Partners to:

- ✓ Have appropriate policies and programs to maintain good relationships with local communities and other stakeholders.
- ✓ Have strategies in place to reduce their environmental impact over time.
- ✓ Use resources responsibly and conduct operations with the aim to protect and preserve the environment. As appropriate, Business Partner facilities must have suitable plans for notifying local authorities in the case of accidental discharge or release of hazardous materials or any other environmental emergency.



Caring for  
Community

## 4. Integrity, Ethics and Anti-Corruption

HomeServe has a zero-tolerance approach towards illegal activities, including bribery and corruption, money laundering, tax evasion, sanctions, and export control violations. HomeServe's approach is designed to ensure that we do not become involved in, or facilitate, any illegal activities, as our reputation is integral to our business. In all of its business dealings, HomeServe is fully dedicated to the principle that fair competition is essential to a free enterprise system and expects the same of our Business Partners.

HomeServe has an Anti-Bribery and Anti-Corruption Program and Policy designed to prevent employees and Business Partners from paying or receiving bribes or undertaking corrupt activities. We expect our Business Partners to share these principles and uphold our standards and to develop and maintain policies and programs as appropriate to ensure that their representatives understand and adhere to these standards. HomeServe expects all Business Partners to:

- ✓ Comply with all applicable anti-bribery, anti-corruption, and anti-money laundering laws.
- ✓ Comply with all applicable competition and antitrust laws.
- ✓ Refrain from offering or making any payments of money or anything of value to any public officials, political parties, candidates for public office, charities or other business-related parties that could be considered to improperly influence any act or decision of such official or person for the purpose of promoting HomeServe's business interests, or otherwise in violation of applicable law. This includes a prohibition on "facilitation" payments of any kind.
- ✓ Refrain from entering into business relationships or transactions with HomeServe or our employees (including temporary employees), directors or officers in an individual capacity or in any way that could create the appearance of a conflict of interest or impropriety.<sup>1</sup> While conducting business with HomeServe, refrain from taking any action that may be influenced by personal interests or relationships, and disclose to HomeServe and appropriately manage any actual or potential conflicts of interest arising due to either personal or business relationships.
- ✓ Not knowingly facilitate a person involved in any activities considered to be tax evasion.
- ✓ Promptly apprise HomeServe if they or any related company (including parent companies) have been named or listed as the target of any economic, trade, or transactional sanctions imposed by any governmental agency; or otherwise banned

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<sup>1</sup> Utility providers that partner with HomeServe would not be subject to this prohibition to the extent that such providers are offering services to the general public and consequently are offering services to our employees, directors and officers in the ordinary course of business.

or blocked pursuant to any laws that are enforced or administered by any governmental agency.

- ✓ Comply with all applicable trade restrictions and sanctions laws, and not knowingly employ or do business with anyone suspected of being connected with criminal or terrorist activities or who is the subject of applicable trade sanctions.

## **5. Fraud**

HomeServe expects its Business Partners to implement appropriate controls to prevent any act or intent of cheating, tricking, stealing, deceiving, misrepresenting, or lying for any personal or professional advantage. Fraud is inherently incompatible with our values and corporate culture, which operates with integrity, fairness, and transparency. Allegations of fraud will be investigated and referred to law enforcement for criminal prosecution when warranted. Our Business Partners must not engage in any fraudulent behavior, including but not limited to any of the following:

- ✓ Misappropriating funds or property,
- ✓ Misusing business resources for private purposes,
- ✓ Making or submitting false expense claims,
- ✓ Submitting false or misleading invoices,
- ✓ Failing to submit proper documentation,
- ✓ Intentionally filing false financial records or statements,
- ✓ Falsifying product or business information or supporting documentation,
- ✓ Improper or unauthorized use of HomeServe trademarks,
- ✓ Stealing or misusing intellectual property (including misuse of the HomeServe name), or
- ✓ Stealing or misusing proprietary or confidential business property or intelligence.

## **6. Responsible Labor Practices**

HomeServe respects and supports human rights and only does business with Business Partners that treat their workers with dignity, respect and in accordance with applicable laws. We expect our Business Partners to respect human rights and maintain processes to identify and prevent adverse human rights impacts that could arise from their or their suppliers' operations. HomeServe expects Business Partners to:

- ✓ Provide a safe and secure workplace for their employees, contractors, and representatives that complies with all applicable health and safety laws, regulations, and practices.

- ✓ Comply with all applicable employment laws, including those pertaining to withholding taxes, wage deductions, minimum wage, labor relations, insurance, and health and occupational safety.
- ✓ Provide training as necessary to ensure employees and workers have the required skills and certifications to perform the assigned work.
- ✓ Adhere to age-related standards set by the International Labor Organization and not use child labor or any form of forced or involuntary labor.
- ✓ Provide a workplace free from discrimination and harassment, whether on the basis of gender, age, disability, ethnicity, sexual orientation, religion, or any other basis prohibited by applicable law.

## 7. **Workplace Health & Safety**

HomeServe expects its Business Partners to provide a workplace that seeks to prevent injury and ill-health and at a minimum:

- ✓ Provide and maintain a clean, safe, and healthy working environment that complies with applicable laws, directives, and regulations, and minimizes occupational hazards. Any Business Partner-controlled worksites should at a minimum include reasonable access to sanitary facilities, fire exits, drinkable water, and adequate lighting and ventilation, and any residential spaces must be sanitary and safe.
- ✓ Implement procedures designed to prevent injury to workers, including providing adequate work training and personal protective equipment as appropriate and safeguards against infectious disease.
- ✓ Maintain reporting systems for workers to document health and safety hazards and incidents.
- ✓ Promptly inform HomeServe of any material health and safety incidents that occur while performing services for, or delivering goods to, HomeServe, its customers, or partners.

## 8. **Confidentiality**

HomeServe takes seriously its obligation to protect confidential and proprietary information, including sensitive data and trade secrets, and expects the same commitment from its Business Partners. Business Partners will protect personal, proprietary, and confidential information (“**Confidential Information**”), including information that they access, receive or process on behalf of HomeServe. Business Partners must adopt and maintain processes to provide reasonable protections for such information and a degree of care that would apply to a Business Partner’s own confidential information, but in any event, a reasonable degree of care.

## **9. Insider Trading**

Each Business Partner must ensure that non-public information obtained in the course of its business relationship with HomeServe is not used for the personal benefit of such Business Partner, its workers or other third parties. Information provided to Business Partners by HomeServe may include material non-public information (“MNPI”) about us or other companies associated with us that could be publicly traded and could influence an investor’s decision to buy or sell securities in [such] publicly traded companies. Business Partners must never pass on non-public information or encourage any person to make a decision on trading or acquiring shares based on such information.

Our Business Partners agree not to, and not permit their employees, contractors and agents who are in possession of HomeServe MNPI to buy or sell any securities based on MNPI; or recommend that any other person buy or sell any securities while in possession of MNPI.

## **10. Data Protection and Information Security**

The safeguarding of HomeServe Confidential Information and privacy is of paramount importance to HomeServe. As such, we expect our Business Partners to:

- ✓ Comply with any and all applicable laws and regulations, including those relating to data protection, privacy, security or the processing of personal data and information and not take any action that would prevent HomeServe from complying with its legal obligations.
- ✓ Where Business Partners have access to HomeServe Confidential Information, provide services that are substantially aligned to an industry-recognized information security framework and have robust information security policies. Upon request, Business Partners will provide a copy of their information security policy.
- ✓ Maintain appropriate administrative, technical, organizational, and physical safeguards to preserve and protect HomeServe Confidential Information.
- ✓ Business Partners must notify HomeServe immediately of any privacy breaches, security breaches or loss of HomeServe Confidential Information.

## **11. Business Continuity and Disaster Recovery**

We expect our Business Partners to have in place adequate business continuity and disaster recovery plans designed in accordance with relevant industry standards and the terms of their respective agreement(s) with HomeServe. Depending on the relevant applicability and nature of the respective businesses, Business Partners must have plans in place for their business and services to continue with minimal interruption in the event of an emergency, crisis situation, weather or other natural disaster, pandemic or epidemic, terrorist or security-related event, strikes, labor or other resource constraints,

system or facilities outage, power outage, telecommunication outage, or any other event that results in an interruption or suspension of services that are important to HomeServe's business, operations, or reputation. Upon our request Business Partners must disclose in reasonable detail the elements of their business continuity plans.

## **12. Insurance**

Business Partners must maintain all required insurance coverage needed to provide services to HomeServe. Business Partners will provide proof of insurance coverage upon request.

## **13. No Publicity**

Business Partners must not use any of HomeServe's or its affiliates' names, tradenames, marks, or other proprietary trademarks in any public or promotional materials without the prior written consent of HomeServe.

## **14. Compliance with this Code**

Business Partners will ensure that their personnel, contractors, agents, and other representatives understand and comply with this Code. We expect our Business Partners to share our commitment to the minimum standards and principles in this Code and to have their own internal policies and procedures in place to support and monitor their compliance with such commitment. Where incorporated into any contract, this Code will survive the contractual term. HomeServe expects that Business Partners will:

- ✓ Promptly notify HomeServe as soon as they become aware of any actual or suspected breach of this Code. The contents of this Code are additional to and do not in any way affect or prejudice any of HomeServe's rights and remedies under the relevant agreements with each Business Partner, if any. In the event of any non-compliance with the requirements of this Code or breach of agreement, HomeServe reserves the right and retains the sole discretion to exercise any rights under this Code, any relevant agreement, and/or local laws and regulations. The failure or omission by HomeServe to insist upon strict performance and compliance with any of the provisions of this Code at any time shall in no way constitute a waiver of its rights. For further information on reporting, see [Section 15, Reporting Hotline](#).
- ✓ Cooperate with HomeServe to ensure its compliance with applicable laws and regulations. This includes responding to HomeServe's reasonable requests for information, maintaining adequate documentation of compliance programs and obtaining compliance certifications as reasonably requested.

Conducting business with HomeServe will indicate your acceptance of this Code. However, we also reserve the right to perform audits at reasonable times and upon reasonable notice to ensure that our Business Partners continue to uphold the values

outlined in the Code. Failure to comply with our Code may result in discontinuance of our business relationships with you, with immediate termination rights.

In the event of any conflict or ambiguity between any provision of this Code and the provisions of any relevant agreement with any Business Partner, the provisions of that agreement will prevail. This Code is subject to modification from time to time.

## 15. Reporting Hotline

HomeServe maintains a Reporting Hotline (referred to as the HomeServe Ethics Hotline) for our employees, Business Partners, partners, and various other interested parties to anonymously report any concerns or raise any issues free of discrimination, retaliation or harassment pertaining to:

- ✓ Accounting, auditing or other financial reporting irregularities;
- ✓ Unethical business conduct (including safety, environment, conflicts of interest, theft and fraud); or
- ✓ Violations of applicable law.

We are committed and require that our Business Partners commit to protecting the confidentiality of any whistleblowers to the fullest extent permitted by law. Retaliation against any person who reports actual or suspected workplace grievances or other violations of law is strictly prohibited.

Our Business Partners are encouraged to seek guidance from their own internal resources if they are uncertain how to act in a given situation. Business Partners that suspect or become aware of an actual violation of applicable laws, rules, regulations, or directives while doing business with HomeServe must promptly report the matter to us. All Business Partners must cooperate fully with any investigation or audit that arises from a report of corporate wrongdoing.

The HomeServe Ethics Hotline may be accessed by telephone (toll free) at the number listed below or by submitting an anonymous report online at: [www.homeserve.com/ethics](http://www.homeserve.com/ethics). We will investigate all reports in compliance with applicable laws or as we otherwise deem necessary.

Ethics Hotline (Toll Free)	Ethics Web Portal
1-800-461-9300	<a href="http://www.homeserve.com/ethics">www.homeserve.com/ethics</a>