



OUR CODE OF  
**BUSINESS  
CONDUCT**

| 2018 |



# OUR COMMITMENT TO INTEGRITY

## A Message From Our Chief Executive Officer

Dear Colleague,

HomeServe has been fortunate to experience continued growth, and we expect to continue sustaining that growth in the years to come. With growth comes pressure to sustain past achievements and exceed future expectations, that's why it's important for us to keep integrity top of mind in everything we do, every day, without exception.

Acting with integrity is about more than just protecting our reputation or avoiding legal issues, it's about doing what's right, not what's easy. This standard applies to everyone at HomeServe and should guide our dealings with customers, partners, suppliers, vendors, contractors, and one another.

Conducting business with integrity has been central to our identity since day 1, and is the reason why our customers trust us, purchase our products, call us when they are in need, and invite us into their homes. As our business continues to evolve, we must commit to fostering this identity and nurturing the faith customers have in us.

The HomeServe Code of Business Conduct serves as a roadmap for acting with integrity. All employees in the HomeServe family of companies, regardless of seniority, function, or location, should understand the Code of Business Conduct and personally commit to adhering to it. In conjunction with other HomeServe policies and guidelines, we have standards in place to ensure we always "do what's right." Please review this document carefully, consult it frequently, and if you ever have any questions, ask for guidance.

I am extremely proud of our business and the reputation we have built. With your help, I am confident that we will continue to grow and do so honestly, ethically, and with the highest levels of integrity. Thank you for your commitment to these principles.

Regards



John



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# Introduction

The Code of Business Conduct (CoBC)  
Our Vision, Mission, Values, and Promises  
Customer Promise  
People Promise



# OUR CODE OF BUSINESS CONDUCT (“CoBC”)

## Be Proud of What We Do and How We Do It

**Our reputation is critical to our continued success. Our principled interactions with consumers, customers, employees, public officials, suppliers, shareholders, and other stakeholders is reflective of our commitment to the highest standards of integrity and enhances our reputation as we continue to grow our business.**

The HomeServe CoBC is designed to help you understand and follow the basic compliance and ethics rules that apply to your job and to advise you on when, and with whom to raise questions. It applies to every director, officer, employee, and consultant working in the HomeServe family of businesses, regardless of role, function, or geographic location. HomeServe employees that manage third parties acting on HomeServe’s behalf have a responsibility to make such third parties aware of the CoBC and our expectation that they comply with it.

The CoBC should be read in conjunction with the **HomeServe plc Group Toolkit** (“Group Toolkit”), the HomeServe plc Code of Business Conduct (attached hereto as Exhibit 1), and other HomeServe policies and guidelines. These policies can be found on the HomeServe intranet.

By reading and following the CoBC, raising questions, and reporting any illegal or unethical conduct, you are helping HomeServe abide by its commitment to comply with all laws and follow high ethical standards. Should the Group Toolkit or any other HomeServe policy conflict with this CoBC, this COBC shall control. Please contact the Legal or Compliance department for guidance regarding your obligations.

The CoBC is fundamental to our commitment to comply with all applicable legal requirements and high ethical standards. However, it is not intended to describe every law or policy that might apply to every situation. You should make sure you are also familiar with and follow any additional policies that apply to you that are implemented by HomeServe or your business area. If any of those policies are stricter than the CoBC, the stricter rules should be followed.

You are responsible for reading and complying with the CoBC and other HomeServe policies, and for performing your work ethically. Violations of the CoBC can have serious consequences for HomeServe and for each of us as employees. As a result of a violation, you may be disciplined, with serious violations possibly leading to termination of your employment and other legal remedies including civil or criminal prosecution. You also have a responsibility to report any illegal or unethical conduct that you witness or about which you learn. Your responsibility to report illegal or unethical conduct is outlined in the CoBC.

Importantly, HomeServe strictly prohibits retaliation against any employee who, in good faith, reports a possible violation. HomeServe also strictly prohibits any conduct designed to impede an individual from reporting a possible violation.

Finally, the CoBC does not constitute an employment contract between HomeServe and its employees. It also is subject to, and does not change the terms of, any existing employment contract or collective bargaining agreement that may be applicable to you. The HomeServe Board of Directors is responsible for the final interpretation of the CoBC, and may revise, change, or amend the CoBC at any time, subject to the terms of any applicable collective bargaining agreement or local laws and/or legislation.

**Q** | Why do we need a Code of Business Conduct?

**A** | The CoBC outlines HomeServe’s commitment to conducting business in accordance with our vision, mission, and values, as well as all relevant laws and regulations and industry standards. It provides guidance on what is expected of each of us and a frame of reference for other HomeServe policies and guidelines.

## Our Vision, Mission, Values, and Promises

### Our Vision

To be the first place people turn to for home emergencies and repairs.

### Our Mission

To free our customers from the worry and inconvenience of home emergencies.

### Our Values

To put our customers at the heart of everything we do.

Develop and engage great people who are passionate about customer service and making things happen.

Combine relentless innovation with integrity and professionalism.

Strive to be the best provider of emergency repair services.

## Customer Promise

Our Customer Promise details the fundamental principles that we strive to achieve each and every time we interact with a potential or current customer. All HomeServe employees, regardless of their role, have the responsibility to live up to these expectations on a daily basis. By putting the customer at the heart of everything we do, we can ensure that we satisfy these “promises” and routinely deliver a best-in-class experience for our customers.

**Q** | How does our Customer Promise line up with the CoBC?

**A** | Our relationship with our customers is critical to our continued success. Complying with our policies and guidelines demonstrates our commitment to the highest standards of integrity and will aid us as we continue to grow both domestically and abroad.

# Customer Promise

**Before a Customer joins**  
We'll make it clear what they're buying and what it will do for them

**When a Customer joins**  
We'll tell them how much they're paying, what that buys them and how to make a claim

**When a Customer becomes a member**  
We'll make life easy for them

**When a Customer makes a claim**  
We'll solve their problem quickly and easily-their emergency is our emergency

**If a Customer's not happy**  
We'll listen, apologize and make things right wherever we can, as soon as we can

## People Promise

At HomeServe, we are passionate about developing and engaging great people who are eager to take responsibility and make things happen. Our People Promise lays out what we expect from our employees and what our employees can expect from us.

# People Promise

**Keeping the customer at the heart of everything we do**

## You Can Expect HomeServe USA To:

- Provide a safe and healthy work environment
- Keep employees updated on the strategic growth and direction of the business
- Foster a culture of pride and fun in our organization
- Provide tools and support to help you succeed and reach your full potential
- Encourage a work-life balance
- Hire the right people for the right job
- Give back to the communities in which we work and live

## HomeServe USA Expects You To:

- Honor our values and be a brand ambassador for HomeServe USA
- Take ownership and pride in your work
- Meet or exceed the requirements outlined for your role
- Be trustworthy and act with integrity
- Be proactive and take responsibility for your professional development
- Be flexible and adaptable to changing situations
- Speak up, share your ideas and be part of the solution

## We Expect Each Other To:

- Lead by example
- Value each individual as unique and demonstrate mutual respect
- Celebrate each other's accomplishments and hard work
- Collaborate to promote the growth of HomeServe USA
- Encourage open, constructive and timely communication and feedback







# Our Expectations

Responsibility for Compliance

Getting Help & Advice, HomeServe Whistle Blower Hotline

The Way We Work

# OUR EXPECTATIONS

## Responsibility for Compliance

Each HomeServe employee is responsible for compliance with the CoBC and HomeServe policies in addition to all laws, regulations, and industry standards. HomeServe places its trust in each of you to act in a way that is not only compliant, but that supports our vision, mission, and values.

The Compliance Department manages our Compliance program and, in addition to the Human Resources Department, is here to provide help and guidance on all issues relating to the CoBC and HomeServe policies, guidelines, and procedures.

If you manage people, you are expected to ensure that the individuals who report to you receive the guidance, resources, and training they need to enable them to do their job in compliance with the CoBC and HomeServe policies. You must take personal accountability for creating an environment of trust in which people feel able to ask questions, raise concerns and report suspected violations without fear of reprisal.

We expect temporary employees and independent contractors, including our Contractor Network, consultants, agents, and any other third party who acts on HomeServe's behalf, to act in accordance with the principles of the CoBC. If you are involved in retaining or managing any such third party, it is your responsibility to ensure that they are made aware of the CoBC (including changes thereto) and our expectation that they comply with it.

## Getting Help & Advice, HomeServe Whistle Blower Hotline

### None of Us Know the Answer to Every Question or What to Do In Every Situation – We All Need Help and Advice

Every day we face situations that may be unfamiliar to us or where we are unsure as to the best course of action to take. We naturally turn to those we work with and trust to seek support and guidance in doing our job. Applying the CoBC, HomeServe policies, and laws and regulations to our daily work is no different. No one is an expert in all matters or intuitively knows what to do in every situation.

Whenever you are unsure about the areas raised in the CoBC or any other matter, the right thing to do is to ask questions and seek advice. In some instances, it may simply be a case of confirming that the action you intended to take is the right one and in-line with the CoBC, Customer Promise, or other HomeServe policy or guideline. In others, it may be that you have knowledge of, or reasonable suspicion of, legal or regulatory violations, or other questionable conduct or practice.

In any of these instances, you should raise your concern. Where you believe there to be a violation of the CoBC, HomeServe policies, or the law, you have an obligation to report the matter promptly through one of the routes described in this document. This is the case even where you do not necessarily have all the facts, as long as the report is made in good faith.

Guidance is given throughout the CoBC as to who you can ask for further information or advice on particular subjects. On all matters you can go to your manager to ask for help, raise an issue, or check on the right course of action.

**Q | Does the CoBC apply to everyone at HomeServe?**

**A |** The CoBC applies to everyone working for HomeServe regardless of whether temporary or permanent, and irrespective of location, role, or level of seniority. We also expect temporary and contract employees, consultants, agents, contractor network and any other third parties who act on HomeServe's behalf to act in accordance with the principles of the CoBC.

**Q | Does the CoBC contain everything I need to know to do my job?**

**A |** No. The CoBC cannot detail everything you need to know in doing your job or every situation that you may encounter. You are responsible for learning about and conducting your work in accordance with HomeServe's values, the CoBC, HomeServe policies, and all applicable laws. Other HomeServe policies and guidelines, not specifically referred to in the CoBC, or those that elaborate on the CoBC that may be relevant to your job can be found on the HomeServe intranet.

**Q | As a manager, do I have additional responsibilities?**

**A |** Yes. If you are responsible for managing people, you must lead by example and act as a role model for others. You need to ensure that anyone who reports to you receives guidance and training and the resources he/she needs to protect him/herself and HomeServe. You are responsible for creating an environment of trust that encourages open discussion about compliance or ethical concerns and where people feel able to report suspected violations without fear of reprisal. If you are involved in retaining third parties to act on HomeServe's behalf, you must ensure that they are made aware of the CoBC and our expectation is that they will act in accordance with its principles and values.

There may be some occasions where you would prefer to speak to someone else in the first instance. In such situations, you can contact someone in the Legal department, the Chief Compliance Officer, or a member of the Human Resources team.

In addition to the above, HomeServe's Whistle Blowing Hotline ("the Hotline") is a resource for all of us to use to raise areas of concern about compliance and ethics matters, criminal activity, unacceptable behavior, or to make a report when we believe there to be a breach of the CoBC or HomeServe policies. The Hotline is managed by Expolink, an external company independent from HomeServe, with staff who are trained to deal with your call, and translators who are immediately available to assist if required.

If you feel more comfortable doing so, you can call the Hotline anonymously. If you give your name, it will be kept confidential unless HomeServe is required to disclose it as a result of legal proceedings or a government investigation. Certain matters may be more difficult to investigate when they are reported anonymously, so we encourage you to provide your name in such circumstances.

When you contact the Hotline, Expolink will promptly send a confidential report to an authorized representative within HomeServe plc. The matter will then be investigated promptly by independent staff under the supervision of the HomeServe plc Assurance Risk & Best Practice Director. You will be given a unique report number that you can use to check on the action being taken in response to your report. Depending on the nature of the issue, a formal investigation may be initiated.

You may contact the Hotline using the following number: [1 \(877\) 533-5310](tel:18775335310).

Under no circumstances is it acceptable to engage in conduct that is designed to impede an individual from reporting a problem. Further, HomeServe will not tolerate any retaliation for reporting a problem or assisting in an investigation. Anyone found to be obstructing others from reporting a problem, or involved in retaliation against an individual who has raised a concern in good faith will be subject to disciplinary action, up to and including termination of employment.

The important thing is to voice your concern.

You should:

- Ask your manager, Legal, Compliance, or Human Resources if you are unsure what to do or need guidance.
- Always report promptly any potential or actual breaches of the CoBC or HomeServe policies of which you are aware to your manager, the Legal or Compliance team, Human Resources, or the Hotline.
- Make use of the Hotline – 1 (877) 533-5310 which is available to you anonymously if you wish.

**Q | If I am unsure of what to do or need guidance regarding a potential issue, who can I speak with?**

**A |** Your manager is there to help you with any matter related to the CoBC and HomeServe policies on which you need advice or when you are unsure about the right thing to do. Where you believe that the CoBC, a HomeServe policy, or law may be or is being broken, you must report such conduct. Your manager is generally your first point of contact in such cases. However, there are other channels available to you, including Human Resources, Legal, Compliance, or the Whistleblower Hotline.

**Q | I'm thinking of contacting the Hotline about something happening in my team, but I'm worried my manager will find out it was me. Is the Hotline confidential?**

**A |** Yes. Each report given through the Hotline is handled confidentially, and when you make a report, you are given the option to remain anonymous. However, disclosing your name is likely to make it easier to conduct a thorough investigation.

**Q | I'm worried my manager, or another HomeServe employee, will retaliate against me if I report a potential violation of the CoBC, HomeServe Policy, or law – will HomeServe protect me?**

**A |** Yes. HomeServe will not tolerate any retaliation against an individual for raising a concern in good faith, making a report, or assisting in an investigation.



## The Way We Work

### Embrace HomeServe's Values. Be Proud of What We Do. Act With Integrity.

Our purpose and values drive the way we work and define our business principles which are inherent in everything we do, every day, everywhere.

You should:

- Conduct business in a manner that is honest, sincere, and trustworthy.
- Learn about and conduct business in accordance with all relevant laws, regulations, industry standards, and HomeServe policies (including the CoBC and Customer and People Promises) that apply to your job.
- Monitor and report on our compliance with laws, regulations, and industry standards to appropriate parties when required to do so.
- Ensure that third parties acting on HomeServe's behalf, including temporary employees, independent contractors, members of our Contactor Network, consultants, agents, partners, suppliers, vendors, and affiliates, are made aware of the CoBC and our expectation that they comply with it.
- Always seek advice and guidance if you are unsure about the course of action to take and encourage others to do the same.
- Never impede an individual from raising an issue, reporting an issue, or speaking up.
- Never judge or retaliate against an individual who speaks up, reports a breach, or participates in an investigation in good faith.
- Act in a truthful and cooperative manner in all aspects of your role, and in connection with investigations.

**Q** | How should I handle situations not covered by the CoBC?

**A** | You may face situations which are not explicitly covered by the CoBC and you are unsure of the correct course of action to take. In such a situation, it can be helpful to ask yourself some questions:

- Is the action legal?
- Does it support HomeServe's values?
- Could it expose HomeServe to unacceptable risk?
- Does it comply with the spirit of the CoBC and HomeServe policies?
- How would it appear to others – your manager, colleagues, or family?
- Would you be comfortable if it was reported in a newspaper?
- Does it feel right?

If you still have concerns, seek guidance from your manager, Legal, Compliance, or Human Resources.



# Our Services

Marketing & Sales  
Corporate Identity

# OUR SERVICES

## Marketing & Sales

### We Want HomeServe's Marketing and Promotional Activities to be Recognized as the Best in the Industry.

We are passionate about our customers and strive to put them at the heart of everything we do. We recognize that our reputation is critical to our continued success. Before a customer joins HomeServe, we'll make it clear what they're buying and what it will do for them. To that end, we advertise, market, and sell our products and services responsibly.

We comply with all laws and regulations governing the marketing and sale of our products and services, including those related to advertising laws, licensing and registration, and data privacy. We also acknowledge feedback and take steps to remedy issues raised in complaints from customers, the Better Business Bureau, and Attorneys General, etc. All employees should be mindful of these principles.

Members of HomeServe's Marketing and Corporate Sales teams are responsible for reading, understanding, and putting into practice the principles and rules set forth in the [HomeServe Marketing Guidelines](#).

If you are responsible for the advertisement, marketing, or sale of HomeServe's products and services you should:

- Comply with all applicable national, state, and local laws and regulations, including advertising laws, licensing and registration, and data privacy.
- Ensure that our brand and associated services are sold in a responsible and ethical manner.
- Ensure that vendors and other third parties are made aware of the principles of this CoBC, the Customer Promise, and other applicable HomeServe policies, and relevant laws and regulations that relate to the sale and marketing of our services.

## Corporate Identity

Our corporate identity is shaped by the way we present our brand to the world. We influence what people think and feel about the HomeServe brand through the appearance and substance of our communications with customers, potential customers, partners, potential partners, and anyone else who may touch or interact with our brand. Because our reputation is critical to our continued success, the proper use, appearance, and communication of our logo, brand, and services is essential in everything that we do – whether it is a home emergency service call, direct mail sent to a potential customer, or question received at our Call Center.

Employees who are responsible to market, advertise, or prepare communications with customers are expected to read, understand, and put into practice the rules set out in the [HomeServe Corporate Branding Guidelines](#). Any exceptions to the Branding Guidelines must be approved by the Marketing team.

**Q** | I'd like to use a customer testimonial on a company website, is that OK??

**A** | Yes. Our Marketing Guidelines allow for the use of customer testimonials. However, before using a customer testimonial, we must ensure that we have the appropriate authorization from the customer to use their name, city/state, and statement in our advertising, and that the testimonial doesn't make any unsubstantiated claims.





# Personal Integrity

Conflicts of Interest

Accepting Gifts or Entertainment

Reporting

# PERSONAL INTEGRITY

## Conflicts of Interest

### **Avoid Activities or Financial Interests That Interfere with Your Job Performance, Your Loyalty to HomeServe, or to Judgments You Make on HomeServe's Behalf.**

A conflict of interest may arise in any situation in which you engage in any activity that detracts from or interferes with your full, loyal, and timely employment at HomeServe, or you have a financial interest that might influence your judgment on our behalf. It is important to avoid such conflicts. If you ever think that you might have a conflict, or if you think you may appear to have one, you should discuss the situation with your manager, legal or compliance department, and/or a human resources representative. There are times when apparent conflicts may be resolved simply by disclosing them, and other times when there is a need to eliminate the conflict.

Conflicts can arise in many ways. Examples of the more common conflicts are as follows:

#### **Outside Jobs or Affiliations**

Holding a second job or consulting or contracting with another employer may raise a conflict of interest, or at least the appearance of one. To avoid this, do not engage in any freelance or "moonlighting" activity or employment that:

- Adversely affects the quality or quantity of work you perform for HomeServe.
- Competes with our business.
- Implies that HomeServe sponsors or supports your outside employment or the organization for which you are working.
- Harms HomeServe's reputation.
- Makes use of or interferes with HomeServe's time, facilities, resources, or supplies.

#### **Interests in Other Businesses**

### **Ownership Interests in Affinity Partners, Competitors, Suppliers, or Customers are Not Allowed, Except for Minor Investments in Their Public Securities.**

Investing in, lending money to, or serving as a director for a competitor may be a conflict of interest. So too is having such an interest in one of our affinity partners, contractors, vendors, or suppliers with whom you, or anyone who reports to you, works with as part of your employment with HomeServe. Any interests should be discussed with your manager or the Legal and Compliance teams before they are undertaken.

The only exception to this prohibition is that we allow minor investments in the publicly traded stock of competitors, partners, suppliers, and customers. An investment is "minor" if it is in an amount that will not influence or appear to influence your decisions on behalf, and could not influence the decisions of HomeServe in which you have invested. Typically, this means holding no more than 5% of the outstanding shares of the publicly traded company. These limits do not apply to investments through mutual funds, which are allowed without

regard to investment value. If you have holdings that are (or grow to be) greater than these limits, you should notify your manager promptly.

It also may be a potential conflict if your spouse, domestic partner, or other immediate family member works for, consults or otherwise has a financial interest in one of our affinity partners, contractors, vendors, or suppliers. Accordingly, you also need to disclose any such interest to your manager or the Legal and Compliance teams. Disclosure is important to make sure that there is no appearance of improper communications or conflicted loyalties.

### **Corporate Opportunities**

You have a duty to advance our legitimate interests when the opportunity to do so arises. It would be inappropriate to take personal advantage of opportunities that are discovered through your position or with the use of company property, information, or time.

### **Nepotism & Close Personal Relationships**

It is a conflict to supervise or make employment decisions involving a relative or someone with whom you have a close personal relationship.

We do not strictly prohibit the employment of relatives, and we do not wish to become involved in consensual relationships between coworkers. However, for the benefit of all employees, it is important to take precautions to ensure that individuals are not and do not appear to be improperly influenced by the existence of close personal relationships. You may not directly supervise or otherwise participate in decisions regarding the hiring, retention, promotion or compensation of your spouse, domestic partner, immediate family members, or others with whom you have the type of close personal relationship that reasonably might be perceived as potentially compromising your ability to make independent, unbiased business decisions.

You should:

- Avoid situations where you, or a family member's personal interests may conflict with those of HomeServe.
- Always disclose any conflicts of interests or potential conflicts of interest to your manager or the Legal and Compliance teams, preferably in writing.
- Keep a record of any conflicts of interest that have been notified to us and any agreed actions.
- Never use your position within HomeServe for personal benefit.

### **Accepting Gifts or Entertainment**

**Limit the Value and Frequency of any Gifts or Entertainment You Accept, and Be Careful to Avoid Even the Appearance that Your Acceptance of Gratuities Might Influence Your Decisions on Behalf of HomeServe.**

We aim to deter others from seeking or receiving special favors from our employees. Accepting any gift of more than nominal value, frequent gifts or entertainment, or entertainment that is more than a routine social amenity can appear to be an attempt to influence you to favor a particular party with whom we do business. To avoid the reality and the appearance of improper relations with current or prospective partners, customers, vendors, consultants and other business associates, follow these guidelines when deciding whether or not to accept gifts or entertainment:



## Gifts

The receipt of gifts and other things of value from entities or persons who do or are seeking to do business with HomeServe can influence, or appear to influence, your business judgment. For this reason, you should only accept gifts during the holiday timeframe or when associated with a special occasion (e.g. birth of a child, wedding, etc.), and where those gifts do not exceed \$300 in value. For those that exceed this amount, you must seek approval from the relevant department head and either the Chief Financial Officer, General Counsel, or Chief Compliance Officer.

If any gifts are received during a non-holiday period, or are not associated with a special occasion, you should inform your manager. If your manager considers that it could be damaging to the relationship to return them, the gift may be retained but must be handed to the Chief Human Resources Officer for use as a raffle prize or disposed of in similar way. Do not solicit gifts of any amount. Also, do not accept any gift that is:

- Offered in exchange for something in return (“quid pro quo”);
- In the form of cash, check, gift card, etc.;
- Indecent or sexually oriented;
- Illegal or violates any of our policies;
- Or that might adversely impact our reputation.

The same guidance applies towards gifts and other things of value given by HomeServe employees to affinity partners, vendors, customers, contractors, vendors, suppliers, prospects, and other external parties. Gifts should only be given during the holiday timeframe or when associated with a special occasion, and should not exceed \$300 in value. Gifts in the form of cash, check, or gift card are strictly prohibited; however, in certain, limited instances, gift cards of de minimis value (less than \$50) may be issued to customers (normally as recompense) from time to time at the discretion of local management.

Gifts that exceed \$300, must be approved in advance by the relevant department head and either the Chief Financial Officer, General Counsel, or Chief Compliance Officer. However, as outlined further below, further caution should be given to extending gifts or entertainment to government officials or anyone involved in the military or federal, state, or local government.

## Entertainment

Normal business entertainment such as routine lunch, dinner, theater, a sporting event and the like, is allowed (as the host or the guest) if it is reasonable, infrequent and in the course of a bona fide business meeting or event intended to discuss business matters or foster better business relations. As a guide, “normal” and “reasonable” business entertainment generally means the typical cost of a lunch or dinner in the particular city that you are in at the time. It does not generally include attendance at extraordinary events or entertainment that involves overnight travel (e.g. tickets to the Super Bowl or a golfing weekend).

If any entertainment does, or may be perceived to, violate these principles, it must be approved in advance by the relevant department head and either the Chief Financial Officer, General Counsel, or Chief Compliance Officer.

Particular caution should be applied in any dealings with government or military officials. More guidance about dealing with government officials is set out in the

**Q** | The CEO of a prospective partner is very fond of football. I have access to a box for four at the Super Bowl and want to give them to him. Is that OK?

**A** | Providing such an extravagant gift would not be considered “normal” and “reasonable”. Because the value of the gift exceeds \$300, you must obtain the approval of the Chief Executive Officer prior to offering the Super Bowl box to the prospective partner.

Company Political Involvement, Bribery, Corruption, and Improper Payments section of this CoBC.

You should:

- Always consider whether the gifts or entertainment you plan to give or accept could be regarded as excessive or inappropriate, or lead to or imply any obligation.
- Seek guidance from your manager, Legal, Compliance, and/or Human Resources if you are in any doubt on the above or are unsure as to what is regarded by HomeServe as a reasonable gift or entertainment.
- Ensure that any gift or entertainment in excess of these principles are approved in accordance with the CoBC.
- Ensure that the gifts and entertainment you give are accurately recorded in the relevant HomeServe reporting system.

## Reporting

All senior employees, as notified from time to time, must keep an accurate record of interests in competitors and third parties that HomeServe has a business relationship with, and gifts and entertainment received from customers and suppliers or prospective customers and suppliers. This record must be in writing and must state clearly the nature of the hospitality received, the identity of the provider of the hospitality and the date on which the hospitality was received. This record must be signed by the employee and submitted to the Group Company Secretary by April 30th of each year.

See Exhibit 1, attached hereto, for a copy of the Declaration Form.



# Commercial Integrity

Company Political Involvement

Financial Crime

- Bribery & Corruption
- Money Laundering
- Sanctions Compliance
- Insider Trading

Accurate Reporting & Accounts

# COMMERCIAL INTEGRITY

## Company Political Involvement

### We must not Lobby or Make Political Donations to Government, Political Organizations, or Individuals Without Prior Approval.

HomeServe employees must not use corporate funds, assets, or facilities to engage in conduct in an attempt (or that could be perceived to be in an attempt) to improperly influence a government or public official, or any other person, to obtain business or a business advantage for HomeServe. We are expected to comply with all relevant laws and regulations governing political donations and lobbying and we must avoid even the appearance of impropriety.

#### Lobbying

Lobbying is any activity that attempts to influence laws, regulations, policies, and rules. In certain jurisdictions, lobbying can also cover sales and business development activity. HomeServe employees may not use corporate funds, assets, or facilities to engage in lobbying activity, either directly or through a third party, without first receiving approval from the Chief Executive Officer or Chief Financial Officer and the General Counsel or Chief Compliance Officer.

Lobbying activities may require disclosure and may be subject to specific rules that are often complicated and subject to change. All HomeServe employees who are, or may be, engaged in lobbying activity are responsible for understanding and complying with applicable registration or reporting laws, regulations, or rules as a result of such lobbying activity. In addition, all lobbyists must comply with the Gifts and Entertainment limits set out in this CoBC and it is the responsibility of the managing employee to ensure that this is the case.

HomeServe employees must maintain copies of mandatory approvals and provide notice of lobbying activity to the Chief Compliance Officer on a quarterly basis.

#### Political Donations

We must not use political donations in an attempt to improperly influence a government official or another person to obtain business or a business advantage for HomeServe. HomeServe employees may not use corporate funds, assets, or facilities to make political donations to legislators, political candidates, regulators, government employees, or public interest groups without having first received approval from the Chief Executive Officer or Chief Financial Officer and the General Counsel or Chief Compliance Officer. Under no circumstances may political donations exceed limits that have been agreed to by the HomeServe Board of Directors. Such limits currently indicate that political donations may not exceed \$20,000 in total or \$1,500 to any one individual entity in a calendar year. All political donations should be transparent and made in accordance with applicable laws, and properly reported in our books and records.

Employees making political donations on behalf of HomeServe must maintain copies of mandatory approvals and report any such donations on a quarterly basis to the Chief Compliance Officer.

**Q** | My neighbor is a state representative and is up for re-election. I know that she sits on a committee which presents legislative recommendations that would directly impact HomeServe's business in my home state. I have reserved money in my annual departmental budget for political contributions and would like to make a donation to her campaign on HomeServe's behalf. I'm sure she'd really appreciate the donation and it could be beneficial for us if she gets re-elected. Can I make a donation on HomeServe's behalf?

**A** | No. Without prior approval from the Chief Executive Officer or Chief Financial Officer and the General Counsel or Chief Compliance Officer, HomeServe employees are strictly prohibited from making political donations using, among other things, corporate funds. Furthermore, we must never use political donations in an attempt to influence elected officials in order to gain a business advantage for HomeServe.



## Political Activity

If you participate in the political process personally, express your views on legislative or political matters, engage in political activities, or make personal political contributions, you must conduct such activities on your own time and at your own expense. You must avoid any reference to your affiliation with HomeServe and make clear that you are acting personally and not on behalf of HomeServe.

## Financial Crime

Financial crime can take many forms including fraud, bribery, money laundering, and insider trading. HomeServe is committed to preventing and identifying financial crime, and has adopted processes and procedures to prevent prohibited or illegal activity from occurring, including a zero tolerance policy for bribery. We have processes in place to prevent and detect financial crime, such as: employee training, regular money laundering and sanctions screening, due diligence for staff, suppliers, vendors, partners, and acquisition targets, and requiring contracting parties to maintain the highest ethical standards in their work on behalf of HomeServe.

Responsibility for HomeServe's financial crime framework rests with the Chief Financial Officer, but we all play an important role in preventing financial crime from occurring. All HomeServe employees are expected to understand the laws and regulations applicable to their roles, as well as relevant HomeServe policies, including the [HomeServe plc Financial Crime and Sanctions Policy](#).

We are all expected to promptly report potential or actual breaches of law or HomeServe policies relating to financial crime to the Chief Financial Officer, General Counsel, Chief Compliance Officer, your manager, or the Hotline.

## Bribery & Corruption

### **We (and the Third Parties that Act on Our Behalf) Comply with Domestic and International Bribery and Corruption Laws, and Have a Zero Tolerance Policy for Bribery and Corruption in any Form.**

It is illegal to offer or give (either directly or via a third party) a government official anything of value in exchange for favorable treatment, including a payment made in fulfillment of their duties (so-called "facilitating payments").

Bribery occurs when anyone offers, solicits, gives, receives or accepts anything of value in exchange for favorable treatment by a company, government authority, official, or employee. Virtually every government around the world has laws prohibiting bribery and corruption. So too does every state in the United States. In addition, an increasing number of countries impose restrictions that apply even when the wrongful conduct is committed outside the country's own borders and/or by citizens of other countries, such as the United States and United Kingdom. Such conduct is governed by the Foreign Corrupt Practices Act and UK Bribery Act of 2010, respectively.

To comply with anti-bribery laws, you should not make any improper payments either directly to a government employee or official, or indirectly through a consultant, agent, or third party. You must also be sure to keep accurate books and records so that any payments are honestly described and not used for unlawful purposes. Where demands for payment are made by governmental or public officials, employees and/or agents or contractors should request receipts and identification details of the official making the demand. All such payments

**Q** | I was told I have to pay a gratuity to a government official to get our contracts approved. We are under pressure to get the product launched. What should I do?

**A** | HomeServe must not provide gratuities to officials for any reason, especially in order to expedite any type of approval process. HomeServe strictly prohibits payments meant to "facilitate" business. The type of activity described here may be perceived as a bribe. Seek the advice of the Legal or Compliance team to determine if there are legally acceptable alternatives.

must be in the form of a check and made payable to the relevant government department not to any person personally.

In the event a demand for payment is not a legitimate request under the applicable law, the official concerned should be informed that any such payments could constitute a criminal offense under State or Federal law and would be reported to the appropriate authorities accordingly.

The anti-bribery laws also may prohibit or restrict the offering or giving of gifts, entertainment, or gratuities to government employees and officials. Please refer to the section on accepting Gifts or Entertainment in this CoBC, and when in doubt, please consult with the Chief Financial Officer, General Counsel, or Chief Compliance Officer with any questions.

You, or a third party under your direction, should:

- Never offer bribes, including “facilitating payments” or any other form of improper payments with the intention of obtaining an advantage for HomeServe.
- Never solicit or accept any gift, payment, or other advantage from any person in return for providing any improper business or other advantage.
- Never do anything to induce or facilitate someone else to breach these standards, and always report any violations or suspected violations.

## **Money Laundering & Sanctions Compliance**

### **We Comply With Money Laundering Prevention Laws, and Do Not Condone, Facilitate, or Support the Laundering of “Dirty Money.” We Must Also Ensure that We Screen Individuals and Entities Against Restricted Third Party Lists.**

By verifying the identity of our partners, vendors, customers, contractors, vendors, suppliers, and other third parties, also known as “Know Your Customer”, we can do our part at preventing identity theft, financial fraud, money laundering, and terrorist financing.

We all need to be vigilant of circumstances that may indicate improper transactions or what are referred to as “red flags”. These would include occasions when a customer, employee, partner, supplier, etc. is unwilling to provide personal or business background information, wishes to receive or disburse funds into or from multiple accounts, wishes to pay with large amounts of cash or appears unconcerned with price, commissions, or other transaction costs.

It is HomeServe’s policy not to accept cash as a form of payment for the products and services we deliver to our customers. However, in certain limited instances customers send, and HomeServe will accept de minimis cash payment from customers where receipt of such funds would not otherwise raise money laundering red flags and the identity of the payer has been verified.

Check or direct debit/ACH payments from customers must be drawn on bank accounts titled in the name of the customer. Similarly, it is HomeServe’s policy that any payment by HomeServe to a vendor, supplier, or other third party must be made to a bank account titled in the name of the contracted vendor, supplier or other third party. Further, no employee may issue any check, drawn on HomeServe’s bank accounts, payable to “cash”, “bearer”, or to third party designees of the person entitled to payment. Cash payments should never be made. Any exceptions to these policies must be pre-approved in writing either by the Chief Financial Officer and the General Counsel or Chief Compliance Officer.

The business shall screen employees, customers, and suppliers against the restricted third party lists set out in the **HomeServe plc Financial Crime and Sanctions Policy**. The business shall prohibit employment or business activities with any such parties and investigate (and resolve) any exceptions that are identified.

It is the responsibility of local management to ensure that HomeServe conducts business in accordance with all local legal requirements. The Finance or Compliance team can give you further advice on our Anti-Money Laundering policy.

You should:

- Seek pre-approval in writing from the Chief Financial Officer and the General Counsel or Chief Compliance Officer prior to any cash payments being made to employees of competitors, suppliers, customers or government agencies.
- Be alert for any changes in customer details, circumstances and profiles, or other “red flags” and notify the Chief Financial Officer, General Counsel, or Chief Compliance Officer.
- Conduct business in accordance with any local legal requirements.
- Do your part to prevent funds from flowing into the hands of terrorist groups, drug traffickers, and other nefarious entities and individuals by speaking up about any red flags you come across.

## Insider Trading

### We Must Not Trade HomeServe plc or Any Other Securities on the Basis of “Insider Information”.

HomeServe plc is publicly traded in the United Kingdom. Trading on the basis of “insider information” is a criminal offense in the United States, as well as the United Kingdom and many other countries.

Information about any listed company or material subsidiary, like HomeServe, that is not generally available to the public and that could affect the market price of the securities of that company is inside information. Anything to which a reasonable investor would attach importance in deciding whether to buy, sell, or retain such securities is also insider information if it is not publicly known.

You must not buy or sell HomeServe plc securities (stocks or bonds) or those of any other listed company if you are in possession of insider information. Nor should you ask another person to do so on your behalf or advise others to do so on the basis of such information. You should never share insider information with anyone, regardless of whether you encourage them to buy or sell stocks, bonds, or other securities. This may be considered “tipping”.

In addition, you should never be involved in spreading false information or engaging in activities designed to manipulate the price of publicly listed securities, known as “market abuse”.

If you have what may be material insider information and are considering trading in HomeServe plc security, or participating in an employee stock purchase plan, you should contact the HomeServe plc Company Secretary, HomeServe USA Chief Financial Officer, the General Counsel or Chief Compliance Officer for advice. If you have been notified by representatives of HomeServe plc that you

**Q** | I am an administrative assistant to one of HomeServe USA's Directors. As such, I have access to quite a lot of confidential information, although I don't tend to read any of it in detail. I'd like to buy some shares of an electricity supplier that we are close to signing a partnership agreement with, but one of my colleagues suggested that I might not be able to because I have access to “inside information”. Is this true?

**A** | If you have information that is not generally available to the public and which could affect the share price or influence an investor, you may have inside information. However, it is not always the case that non-public information would be regarded as inside information. You should ask the Chief Financial Officer, Legal, or the HomeServe PLC Company Secretary for advice.

**Q** | I know that I am in possession of “insider information” and therefore am at times restricted in buying or selling HomeServe shares. However, my brother, who I live with, has mentioned that he'd like to buy some HomeServe shares. I never talk to him about my work, so is that OK?

**A** | You should be cautious in this situation and be clear that there is no information you have ever disclosed to your brother that could be viewed as inside information. Individuals with insider information may be liable for communicating or tipping material, non-public information to any third party. You may want to discuss the situation further with the Chief Financial Officer, Legal, or the HomeServe PLC Company Secretary for further guidance.

need to get permission before you do any trading, you must do so even if you do not believe that you are in possession of material insider information.

Ultimately, it is your responsibility to ensure that you do not breach insider trading rules and follow all applicable HomeServe plc guidelines on share dealing.

You should:

- Never buy, sell, or engage in any other dealings in HomeServe plc securities while being in possession of insider information. This applies even after leaving HomeServe employment.
- Never engage in any dealings involving any other company while in possession of insider information or confidential information about that company.
- Never engage in market abuse by spreading false information or engaging in other activities designed to manipulate the price of publicly listed securities.
- Consult the HomeServe plc Company Secretary prior to trading in HomeServe plc securities when you believe that you may be in possession of insider information.

## **Accurate Reporting & Accounts**

### **The Financial and Non-Financial Information We Create and Maintain, Either Written or Oral, Must be True, Complete, Accurate, and Not Misleading.**

Our credibility and reputation depend on the accuracy of our books, records, and representations. We must ensure that any data, information, or records which we create or for which we are responsible are correct and accurate. Honest, accurate, and objective recording and reporting of information, financial and non-financial, is required not only to meet legal and regulatory requirements but to fulfill our responsibilities to our customers, shareholders, and the public and to enable us to make informed decisions about our business.

Such information can take many forms, ranging from annual reports to our personal travel and expense claims. Any attempt to defraud a customer, partner, shareholder, auditor, or other person with whom we communicate or do business is strictly prohibited. In particular, this includes intentionally or recklessly making any false or misleading oral or written statements, or omissions about our products, services, or financial condition.

We must comply with all laws and external accounting standards and ensure that the information we supply to HomeServe's auditors, regulatory agencies, government bodies, and other third parties is accurate, complete and provides a true and fair view of the financially reported periods. All transactions and contracts must be properly authorized, in line with the relevant supporting documentation, and accurately and completely recorded.

Accurate reporting of HomeServe's financial information includes appropriate recognition of sale and profit. Any activity aimed at artificially inflating or shifting sales or profit between periods may result in a misrepresentation of our position and is unacceptable.

If you communicate with our internal or external auditors you must be sure to provide all information needed in connection with preparing audit reports, and correct any apparent misinterpretation of that information before publication of related reports. You are also to prepare all internal reports and documentation truthfully and accurately.



We must ensure that we act with complete integrity in our travel and expense claim submissions and approvals. Claims must be compliant with the **HomeServe Travel and Expense Policy**, relate to legitimate business expense and be accurate. Any falsification of expense claims will be thoroughly investigated, and may result in discipline up to and including termination of employment.

We must never make a false or misleading entry into any report, record or expense claim. Falsifying records and accounts or misrepresenting facts may constitute fraud and in addition to disciplinary action, could result in civil and criminal penalties for the individual and HomeServe.

You should:

- Create and maintain complete and accurate accounts, data, and records.
- Be vigilant in identifying and reporting any potential misrepresentation of HomeServe accounts, data or records, or any incidence of potential fraud or deception.
- Demonstrate integrity and diligence in submitting our travel and expense claims and in approving those of others.
- Comply with all laws and external accounting standards and ensure that the information we supply to HomeServe's auditors, regulatory agencies, government bodies, and other third parties is accurate, complete and provides a true and fair view of the financially reported periods.

A large, semi-transparent padlock is centered on a background of a glowing blue and orange circuit board. The padlock is rendered in a golden-brown color with a keyhole. The circuit board features intricate patterns of lines and dots, suggesting a high-tech or digital environment. The overall lighting is dramatic, with a strong blue glow from the top and a warmer orange glow from the bottom left.

# Protecting HomeServe Interests and Assets

Handling Our Property and Information

Intellectual Property

Information Management and Security

Data Privacy

Records Retention

Solicitation and Distribution

Theft or Misuse of Property



# PROTECTING HOMESERVE INTERESTS AND ASSETS

## Handling Our Property and Information

Your good judgment is critical for assuring that our property and information are handled responsibly and are not misused or wasted. Our assets are intended to help you achieve your individual business objectives, as well as our overall corporate goals. Careless, inefficient or illegal use of company property hurts all of us.

## Intellectual Property

Like all HomeServe property, confidential information and intellectual property must be protected under all relevant laws.

It is critical that you safeguard our confidential and proprietary information, trade secrets, and intellectual property (including copyrights, trademarks, trade secrets, etc.) just as carefully as you protect all other important company property. This means properly using and carefully protecting the confidentiality of information, regardless of medium, including, but not limited to:

- Business plans or any abstracts of those plans.
- Products, services under development, costs, marketing strategies, projections, lobbying plans, historical or pro forma financial information, or operations data.
- Customer relationships, customer profiles, customer lists, customer information.
- Proprietary information or data, sales estimates.
- Business and financial results relating to past, present, or future business activities.
- Strategic and proprietary information relating to current or potential acquisition targets.
- Computer programs and all associated data and compilations of data, including code, screen images, designs, modules, flow-charts, or work product used to design, plan, organize, and develop any of the foregoing.
- User manuals and training materials.

All documents, files, records, and reports that you acquire or create in the course of your employment belong to HomeServe. You may remove originals or copies of such property from our offices only if necessary to complete your work, and you are to return such records promptly and at any time upon request. If you are involved in an acquisition or divestiture, you may be required to sign a non-disclosure agreement. Whenever you work from an off-site location, all HomeServe files, records, and reports must be protected with the highest standard of care and in accordance with our **Acceptable Use Policy** and any other relevant **Information Security policies**.

Periodically, we have intellectual property, trade secrets, and/or confidential information or proprietary information belonging to someone else. This might include copyrighted materials related to a license agreement, customer data from

**Q** | We're close to signing a partnership agreement with one of the biggest utilities in the United States. One of my colleagues in the Marketing department wants me to share some of the confidential information we've acquired during our negotiations, including customer lists and trademarks. By sharing this information, I'd be doing my co-worker a big favor and would give him a head start on preparing marketing materials. I know that I'm subject to a non-disclosure agreement and shouldn't share this information, but this is practically a done deal. What should I do?

**A** | We all have a responsibility to protect the reputation and resources of HomeServe. We owe the same responsibility to our partners, vendors, and other third parties. As part of our on-going responsibility, we must prohibit the unacceptable or unlawful use of confidential information and intellectual property. By providing confidential information to a co-worker, you may be violating the law or an agreement with a partner. If you have any questions about the use of intellectual property, you should consult with the Legal department.

a prospective partner, or information learned during the course of a proposed acquisition. Use of any such materials or information must comply with any applicable laws and agreements. If you have any questions about the use of someone else's proprietary information or intellectual property, you should consult with HomeServe's Legal department.

You Must:

- Understand and comply with **HomeServe's Information Security policies**.
- Protect the reputation and resources of HomeServe and its clients from irresponsible or illegal activities.
- Ensure the privacy, security, and reliability of HomeServe's information and communication systems, and promote their ethical and productive use.
- Prohibit the unacceptable use of HomeServe's information, documents, files, records, reports, and communication systems.

## Information Management and Security

### We all have a Responsibility to Maintain, Manage, and Protect HomeServe's Information Correctly.

HomeServe's information is critical to everything we do. From the emails and conversations we have in the office, to our advertisements and marketing materials; information is a valuable company asset which we must protect and manage effectively. Failure to do so may impact our brand, revenue, reputation, and impact our ability to operate effectively. Accordingly, it is imperative that we all read, understand, and implement the rules set forth in HomeServe's **Information Security policies**. We all have a responsibility to respect the confidentiality of information that comes into our possession and ensure that we take necessary steps to safeguard that information.

We must take reasonable steps to secure and prevent unauthorized access to information we are responsible for or entrusted with, by keeping our user ID secure, creating strong passwords, and using only approved hardware, software, and systems in a responsible manner. We should also protect HomeServe's information assets from accidental or unauthorized disclosure and classify all information not in the public domain as: internal, confidential, or highly confidential. Third parties handling information on our behalf must have or adopt security standards to protect our data that align with our policies and standards.

The information we create and hold should be accurate, well organized, and easy to access by authorized persons. We should take particular care when people join, move, or leave the company that their information access requirements are correctly provided, changed, or removed.

HomeServe may monitor aspects of its computer systems, including internet activity. To the extent allowable by applicable law, and in accordance with the **Acceptable Use Policy**, HomeServe reserves the right to monitor and review any aspect of its information and communication systems for any reason and without prior notice. Information gathered from such monitoring reviews may be used to investigate or support disciplinary proceedings.

We are required by laws, regulations, and for business purposes to keep certain types of information for specific periods of time and these requirements are set out in our Records Retention Policy, described more fully below.

**Q** | I am responsible for maintaining physical records documenting HomeServe's financial performance. The printer I use is right next to my work station. I usually print many documents over the course of a day and will pick them up periodically. I'm not worried about other employees picking up my printouts because I see who comes to the printer and tell them that I have documents in the tray. I'm not doing anything wrong, am I?

**A** | All HomeServe employees are responsible for protecting our information and assets from accidental or unauthorized disclosures. We can help prevent inadvertent disclosure by locking our computers when we get up from our desk, promptly retrieving printed documents, storing sensitive documents, and always complying with HomeServe's Information Security Policies.



If you suspect or become aware of activities that violate law or HomeServe policies relating to information security, you have an obligation to report such conduct to the Chief Information Security Officer, General Counsel, Chief Compliance Officer, your manager, or the Hotline.

You should:

- Secure and take action to prevent unauthorized access to our records and company data.
- Keep complete and accurate records in a manner that is organized, identifiable, and accessible to authorized persons.
- Manage sensitive and classified information with care, keeping it protected, and dispose of it securely.
- Keep your user names and passwords private.
- Use only hardware and software that has been approved by HomeServe.
- Promptly report activity that violates applicable law or HomeServe policy.

## Data Privacy

### **HomeServe, and Third Parties Acting on its Behalf, Have an Obligation to Comply With Applicable Data Privacy Laws and HomeServe Policy Governing the Acquisition, Storage, Transfer, and Use of Personal Data.**

HomeServe is committed to complying with privacy laws in the countries in which we operate, as well as with relevant HomeServe policies, including our **Customer Data Privacy Policy**, **Data Security & Identity Theft Prevention Plan**, and the **Group Data Protection Policy**. All HomeServe employees, as well as third parties operating on our behalf, have a responsibility to understand and comply with these legal and policy requirements. Failure to satisfy applicable legal requirements and/or violation of HomeServe policies governing data privacy can result in financial and criminal penalties for the individual and HomeServe and may result in discipline, up to and including termination of employment.

In the ordinary course of business HomeServe may hold personal data about former, prospective, and current employees, customers, and partners, and other individuals and entities. This information may be held in email systems, customer management systems, HR systems, and marketing databases. We must respect the confidential nature of any personal data we handle and we have a responsibility to keep it secure at all times. We also have a responsibility to ensure that third parties who process personal data on our behalf comply with these principles. Further, we have an obligation to respect the wishes of our customers (including prospective and former) who do not wish to receive telephone, mail and/or email solicitations, nor want their personal information shared with third parties.

Personal data which we hold or have access to must only be used for HomeServe business purposes and we must ensure it is:

- Fairly and lawfully obtained and managed.
- Processed only for limited or stated purposes.
- Accurate, relevant, and not excessive.
- Not held for longer than is legally necessary.

**Q** | I have access to customer databases provided by our partners. Occasionally, I receive an email from my manager requesting information on a specific subset of customers. I know that we are supposed to securely transmit personal data, but my manager says it's faster to attach the list to an email and send it directly. What should I do?

**A** | Protection of customer data is a top priority of HomeServe. All employees are required to comply with state and federal data privacy laws and applicable HomeServe policies. Seek the advice of the Legal or Compliance teams for guidance on the appropriate way to share and/or transfer sensitive customer data. If you believe a law or HomeServe policy is being broken, you must report such conduct. Your manager is generally your first point of contact in such cases. However, there are other channels available to you, including Legal, Compliance, or the Whistleblower Hotline.

- Processed in line with an individual's rights.
- Securely handled and stored.
- Not transferred to other countries without adequate protection.

Breaches of data privacy law or HomeServe policy must be promptly reported to your manager, the General Counsel, Chief Compliance Officer, or the Hotline.

You must:

- Handle all personal data in accordance with relevant laws and HomeServe policy, and keep it secure at all times.
- Comply with industry standards and best practices – such as PCI DSS, ISO, and data encryption, for the storage and transfer of highly sensitive data (e.g. personally identifiable information, financial data, etc.)
- Honor opt-out requests (e.g. Do Not Mail, Do Not Call, Do Not E-Mail, or Do Not Share) from individuals who do not wish to receive solicitations.
- Honor “Do Not Share” requests from individuals who do not want their information shared with third parties.

If you have any questions regarding HomeServe's data privacy practices, contact your manager, the General Counsel, or the Chief Compliance Officer.

## Records Retention

HomeServe is required by a number of regulations and industry standards to create and implement policies governing the management, storage, retention, and destruction of the Company's records. The aim of the HomeServe Records Retention Policy is to establish guidelines for records retention throughout the organization.

When litigation against HomeServe or its employees is threatened, pending, or filed, or when HomeServe is made aware of a potential or actual regulatory investigation, the Company may be required to suspend normal disposal of specific information and preserve all documents and records that pertain to the underlying matter. In these instances, the Compliance or Legal team will notify the appropriate departments and employees and communicate document preservation requirements by way of a “Litigation Hold Notice”. When this happens, our lawyers will notify those holding the information and they must comply with the instructions received in the Litigation Hold Notice. The IT Department will also be notified following the issuance of a Litigation Hold Notice and will assist in the preservation of electronic records. A Litigation Hold Notice overrides any records retention schedule that may have otherwise called for the destruction of relevant records.

If you have any questions regarding HomeServe's **Records Retention Policy**, or Litigation Hold Notices, contact your manager, the General Counsel, or Chief Compliance Officer.

You Must:

- Only use personal data to which we have access for HomeServe business-related reasons and ensure its use is fair and lawful.
- Ensure we comply with all applicable local data privacy laws and other requirements referred to above in addition to the Data Privacy Policy, Data Security & Identity Theft Prevention Plan, and Records Retention Policy.

**Q** | I received a Litigation Hold Notice regarding documents I have saved to the desktop of my computer. The Litigation Hold Notice says that I should not remove or delete any files from my computer, but I'm afraid that one particular document will expose HomeServe to fines. No one will know if I delete that file, right?

**A** | When you receive a Litigation Hold Notice, you must comply with it immediately and completely. This applies to all information and documents subject to the Litigation Hold Notice, regardless of whether the document hurts or helps HomeServe. Deviation from the Litigation Hold Notice can expose both HomeServe and the employee to criminal and civil penalties. If you have any questions regarding a Litigation Hold Notice, contact the Legal or Compliance department for guidance.

- Ensure that individuals who provide personal data are made appropriately aware of who will have access to the data and for what purpose.
- Refer to the Legal or Compliance team for all formal statutory or regulatory demands or formal requests by individuals to access personal information.
- Ensure that any copying or distribution of personal data (e.g. to third parties) is necessary and with adequate protection.
- Consider data privacy implications before initiating any significant data process activities.
- Retain records in accordance with the HomeServe Records Retention Policy.

## **Solicitation and Distribution**

Our property, equipment, facilities or physical resources may not be used for solicitation or distribution activities that are not related to your employment, except for solicitation permitted by applicable labor laws and charitable activities that have been approved, in advance, by a Human Resources representative.

## **Theft or Misuse of Property**

In addition to stealing, excessive or unauthorized use of HomeServe property is among the types of conduct we prohibit. We will not tolerate actual or attempted theft or misuse of any HomeServe property, the personal property of other employees, or the personal property of customers, suppliers, or vendors. Theft or misuse of HomeServe property can take many forms, including, for example, stealing supplies, equipment, documents, cash or other tangible property; excessive use of telephones, computers, photocopy machines, facsimile machines, or other equipment for non-business purposes; submitting falsified time sheets or expense reports; using our proprietary information, trade secrets or other assets without authority; removing personal property or consumer goods from a customer's residence or vendor kiosk, and retaining any personal benefit from a customer, supplier, or others with whom we do business that property belongs to us.

We are all expected to comply with HomeServe's policies governing the theft or misuse of company property, including, but not limited to, the **Acceptable Use Policy**, **Information Security Policy**, **Instant Messaging Policy**, **Mobile Device Management Standard**, **Employee Handbook**, and this CoBC.





## External Activities

External Communications

Requests for Information by Lawyers and Government Agencies

Community and Charitable Contributions



# EXTERNAL ACTIVITIES

## External Communications

### Everything We Do, Everything We Say, and Everything Our Stakeholders Say about Us Defines HomeServe's Corporate Reputation.

In today's interconnected world, it is crucial that stakeholder communications are managed according to processes and rules which are well understood across HomeServe. By "stakeholders", we mean investors, employees, media, community, government, partners, vendors, customers, and consumers.

Each of us has regular contact with one or more of these stakeholder groups in undertaking our daily work. However, it is important that in doing so, we follow the advice of the appropriate internal resources and departments.

Only authorized employees may communicate with the media or financial community. You are not to provide information or respond to inquiries from the media or the financial community without proper authority, but rather are to refer them as follows:

- Financial Institution (and associated employees), Shareholder, and Financial Media Inquiries: Richard Gannon, Chief Financial Officer.
- General Media Inquiries: Myles Meehan, Senior Vice President, Public Relations.

You Must:

- Refer all media inquiries to Myles Meehan, Senior Vice President, Public Relations.
- Avoid engaging with the media on HomeServe's behalf unless specifically authorized to do so.
- Ensure all media announcements and press releases are approved in advance by Myles Meehan.
- Refer any approach by an investor or financial analyst to Richard Gannon, Chief Financial Officer.

## Requests for Information by Lawyers and Government Agencies

If you are contacted by a lawyer who does not represent HomeServe, or government agents, investigators, or other third parties seeking company information or documents concerning potential or actual litigation or investigations, you should immediately notify HomeServe's Legal department. This is necessary even if the request does not concern a matter involving us. Immediate referral to the Legal department is critical when requests are made in the form of a summons, subpoena, or other document legally requiring that an appearance be made or a response be given by a specified date. The Legal department will assess the situation, determine the appropriate response, and advise those of you who need to be aware of the situation.

**Q** | I've been told the best way to get our products approved by a particular state agency is to hire a consultant to take care of it for me. I've met her and she has asked for \$50,000 as a retainer. Do I need to worry about what she does with it as long as we get the permits?

**A** | Yes. You have a responsibility to ensure that proper due diligence is carried out before engaging anyone who will be interacting with government officials on HomeServe's behalf. Before the consultant is hired, it is essential that you engage with the Legal department in order for proper due diligence to be performed and for appropriate contractual requirements to be put in place if the engagement is able to proceed after the due diligence process.

## Community and Charitable Contributions

### We are Committed to Playing an Active and Positive Role in Our Communities and We Encourage Employees to Do the Same.

Making corporate charitable donations is one way HomeServe seeks to make a difference in the communities in which we operate. While we are proud to support charitable causes, and the charitable causes of our affinity partners, we must be mindful of how corporate or individual donations may be perceived; even a genuine donation can give rise to questions of impropriety.

Any donation made using HomeServe funds or assets must be:

- Transparent and made only to bona fide charitable organizations;
- Made solely for charitable purposes and never used in an attempt to improperly influence a government official or another person to obtain business or a business advantage for HomeServe.
- Made in accordance with applicable laws and only after receiving the requisite, internal approvals.

Other than donations that have been pre-approved or prescribed by contract, any charitable contribution made using HomeServe funds or assets, whether at the request of a colleague, vendor, partner, or other third party, must be approved in writing and in advance in accordance with the below schedule:

#### CHARITABLE CONTRIBUTIONS SCHEDULE

DONATION LIMITS	Department Head	Chief Financial Officer	General Counsel Or Chief Compliance Officer	HomeServeUSA Board of Directors
≤ \$50,000.00	X	X		
> \$50,000.00	X	X	X	X

Department Heads are required to maintain records of all corporate donations, including evidence of all required approvals, and provide such records to the Chief Compliance Officer on a quarterly basis.

#### Individual Donations

Charitable donations that we make as individuals are not regarded as corporate giving and are not subject to these approval requirements. However, as employees of HomeServe, we should avoid any situation where a personal donation could be misinterpreted as a business donation. Employees are also encouraged to consider "in-kind" (e.g. time, skill, etc.) resources as an alternative to financial donations.

If in doubt about whether a particular donation could be construed as HomeServe sponsored, seek advice from your manager, the Chief Financial Officer, the General Counsel or Chief Compliance Officer.

We are all expected to:

- Thoughtfully consider all charitable donations and avoid any appearance of impropriety.
- Never use a charitable donation to improperly influence a government official or other person to obtain business or favorable treatment for HomeServe.
- Follow all applicable approval and record keeping requirements related to donations made on behalf of HomeServe.
- Seek guidance on the relevant procedures from your manager, Department Head, the Chief Financial Officer, General Counsel or Chief Compliance Officer if you have questions.

**Q** | HomeServe has been in negotiation with a large city on a partnership deal. I would like to make a donation on behalf of HomeServe to a charity affiliated with the City. Is it OK to make this donation?

**A** | Maybe not. This type of donation may be construed as an act designed to improperly influence a government official and obtain a business advantage for HomeServe. When unsure, seek guidance from your manager, Department Head, or the Chief Financial Officer, General Counsel, or Chief Compliance Officer.





# Respecting Our Colleagues

Fair Employment Practices

Discrimination

Harassment

Employee Conditions & Unions

Workplace Safety

The Environment

Labor Standards



# RESPECTING OUR COLLEAGUES

## Fair Employment Practices

### **We Support Diversity and Inclusion, Prohibit Harassment and Discrimination, and Are Committed to Safe and Fair Treatment of Employees.**

We are committed to fostering workplaces that promote teamwork, diversity, inclusion, and trust. Our labor and employment policies and practices are consistent with and are intended to ensure compliance with all applicable laws and regulations regarding fair and non-discriminatory labor practices. If you have any questions about the laws or policies governing labor and employee relation matters, you should contact a Human Resources representative and/or the Legal department.

## Discrimination

We are an equal opportunity employer. HomeServe is committed to treating all employees and applicants for employment with respect and dignity, and we prohibit discrimination. HomeServe recruits, hires, develops, promotes, disciplines, and provides other conditions of employment without regard to age, disability, compensation, gender, genetic information, national origin, citizenship, pregnancy, race, color, religion, sexuality, or veteran status. This includes providing reasonable accommodation for employee's disabilities or religious beliefs or practices. HomeServe has zero tolerance for harassment or retaliation prior to, during, or following the recruitment and hiring process.

There may be additional protection provided to employees based on local laws and noted in applicable supplemental employment policies, like the **Employee Handbook**.

We are all expected to treat HomeServe's customers with fairness and respect. In particular, employees should not discriminate against HomeServe's customers on the basis of age, disability, compensation, gender, genetic information, national origin, citizenship, pregnancy, race, color, religion, sexuality, or veteran status.

## Harassment

We will not tolerate any form of harassment. Among other types of harassment, we prohibit sexual harassment or harassment of any kind based upon any of the above mentioned protected characteristics. Harassment can be verbal, physical or visual behavior where the purpose or effect is to create an offensive, hostile, or intimidating environment. Sexual harassment, in particular, can include sexual advances, requests for sexual favors, unwanted physical contact or repeated or unwelcome sexual suggestions. Other prohibited conduct includes, but is not limited to: offensive racial, ethnic, religious, age-related, or sexual jokes or insults, displaying disturbing or offensive pictures or discriminatory information, and bullying. Such behavior is prohibited at HomeServe; violations will be investigated and are subject to disciplinary action, up to and including termination of employment.

## Employee Conditions & Unions

In every country in which we operate, we comply with applicable laws relating to employment and employment conditions. We respect your right of freedom of association and representation either through trade unions, work councils, or any other appropriate forum.

**Q** | I recently overheard a hiring manager discuss some of the candidates she interviewed for a job opening in the Account Management department. She said that one candidate's resume and experience were perfect for the job opening, but she chose not to hire her because she was pregnant. Did the hiring manager do anything wrong?

**A** | Yes. HomeServe recruits, hires, develops, promotes, disciplines, and provides other conditions of employment without regard to any protected classifications, including pregnancy. You should report discriminatory behavior to your manager, the Legal or Compliance team, Human Resources, or the Hotline.

**Q** | My co-workers and I were discussing a safety issue that our local union addressed during our most recent chapter meeting. Our manager, who is not a member of our union, told us that we weren't allowed to discuss union matters on company property; is that true?

**A** | HomeServe takes our employees' and contractors' right of freedom of association and representation seriously. If you feel that you are unable to discuss or engage in matters relating to a union, work council, or other appropriate forum, you can contact your manager, the Legal or Compliance department, or the Whistleblower Hotline.



## Workplace Safety

We are committed to providing a safe workplace. In addition, we have legal responsibilities to take precautions against safety and health hazards. To satisfy this commitment and meet our legal obligations, it is imperative that you and others who are present at our facilities follow all safety instructions and procedures that HomeServe adopts. All employees are expected to be knowledgeable about workplace safety hazards and perform assigned work in accordance with established practices. In addition, where necessary, all employees are expected to use and maintain personal protective equipment issued by HomeServe, and have an obligation to immediately report unsafe conditions.

HomeServe will not tolerate any level of violence in the workplace or in any work-related setting, including corporate offices, company vehicles, or a customer's property. Except where otherwise expressly permitted by law, no employee may bring firearms or any other weapons into such settings, regardless of whether or not the employee is licensed to carry such weapons.

You should alert your manager and a Human Resources representative immediately if you have any questions or concerns about possible health and safety hazards at any of our facilities.

## The Environment

In addition to providing a safe work environment, HomeServe strives to support environmental improvement initiatives and reduce our impact on the environment. We are committed to ensuring that this impact is reduced where practicable.

We seek to comply with the spirit as well as the letter of the applicable environmental laws and regulations with regards to the environment; where none exist, we set ourselves appropriately high standards. We will educate and motivate our employees to conduct activities in an environmentally responsible manner and we encourage our business partners, suppliers, and contractors to do the same.

HomeServe is committed to corporate social responsibility and has established a global **Corporate Responsibility Policy**. Further details about our corporate responsibility initiatives can be found at the HomeServe PLC intranet site.

## Labor Standards

We operate in different states with varying labor standards and conditions. Wherever we do business, we seek to ensure that we and our vendors provide employees with satisfactory working conditions and wages (taking into account local economies), specifically prohibiting the exploitation of employees and the illegal hiring of children.

| Exhibit 1 |

# **Disclosure Schedule**

## CODE OF BUSINESS CONDUCT DECLARATION FORM

Name:	
Job Title:	
Business name/area:	
<b>Hospitality</b>	
<b>Please provide details of any gifts received during the year</b> (including what it was, approximate value, who gave it to you)	
<b>Please provide details of any hospitality received during the year</b> (including when, where, who invited you)	
<b>Please provide details of any hospitality you have provided to customers/partners</b> (including when, where, who was involved and value)	
<b>Interests</b>	
<b>Please provide details of any interests you have in companies/organizations that HomeServe has a business relationship with</b> (this could include share holdings, contractual arrangements and personal relationships with staff at other organizations)	

I confirm that I have read and understood the Code of Business Conduct.

\_\_\_\_\_  
Signed

\_\_\_\_\_  
Date