

Working together to create a respectful, rewarding and inspiring workplace.



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A MESSAGE FROM GUY GITTINS

CHIEF EXECUTIVE OFFICER

I am delighted to introduce 'Getting It Done. Together' which sets out the mutual expectations we share and highlights the essential part each of us plays in building a workplace that is respectful, rewarding and inspiring. This framework serves as a guide to how we can work effectively together, ensuring that our professional environment remains one where everyone feels valued and motivated to contribute their best.

This document contains our Code of Conduct which is at the heart of everything we do and underpins how we get things done together, in a respectful, inclusive and ethical manner. It sets out the rules we must all follow and the standards of behaviour expected of us all.

The Code is aligned with our values as a business, designed to inspire everyone to embrace innovation, maintain professionalism, pursue ambition, and consistently strive for outstanding results, all while offering informed perspectives on the market. Every day we should challenge ourselves to demonstrate behaviours which reflect our values.

Please take the time to ensure you read and understand the Code. It is important that we all know and understand what is expected of us so that, at every turn, we do the right thing by each other, and for our customers. By following the Code, we can make our business even stronger and more successful while fostering an environment in which we are proud to work.

Guy Gittins - Chief Executive Officer

"This document contains our Code of Conduct which is at the heart of everything we do and underpins how we get things done together, in a respectful, inclusive and ethical manner."

Guy Gittins

A MESSAGE FROM NATALIE BOOTH

HR DIRECTOR

At Foxtons, one of our strengths is that we bring together employees from a wide variety of backgrounds, skills and cultures. Combining such a wealth of perspectives, skills and talent creates the diverse and dynamic teams that consistently deliver results. In short, 'Getting It Done. Together'.

As outlined in our Code of Conduct we owe each other honesty, respect and fair treatment. As HR Director I am committed to ensuring that we continue to have an inclusive, professional and respectful work environment.

The Code should shape the way you operate at work, in turn you will be creating a solid foundation for your own personal success as well as that of your wider team.

However, we recognise that on occasion behaviour may fall short of these expectations and, if you become aware of such instances, you should speak up through any of our speak up channels. Where you want to report something anonymously you can do so in complete confidence by using our independent whistleblowing helpline or alternative channels as set out in the speak up policy.

 $My \ wider \ team \ and \ I \ are \ ready, \ willing \ and \ able \ to \ support \ you \ if \ you \ have \ any \ queries \ or \ need \ any \ support.$

Natalie Booth - HR Director



INTRODUCING OUR CODE OF CONDUCT

WHAT IS OUR CODE OF CONDUCT?

Our Code of Conduct explains acceptable workplace behaviour and practices which are aligned with our company values and commitments.

WHY DOES IT EXIST?

- Guides good decisions and ensures all employees maintain high ethical standards and appropriate behaviour.
- · Shows our commitment to legal and ethical duties.
- · Offers direction on where to find more information.

WHO DOES THE CODE OF CONDUCT APPLY TO?

- The Code applies to all employees, no matter their role or seniority.
- We also expect and encourage third parties working on our behalf to follow similarly high ethical standards.

WHAT WE EXPECT FROM OUR MANAGERS?

- To set high standards of professional and personal conduct for employees and lead by example, setting the tone.
- To foster an open-door culture where employees feel comfortable asking questions and reporting concerns.
- To be alert to possible misconduct in the workplace and take action accordingly.
- To promote ethics and compliance through providing continued learning opportunities.

WHAT ARE EMPLOYEES' RESPONSIBILITIES IN RELATION TO THE CODE OF CONDUCT?

This document outlines the four pillars of the Code of Conduct and specifies the expected commitments for each element. In addition, it explains how these commitments relate to your role and responsibilities in supporting Foxtons in meeting these standards. We expect all employees to read, understand and adhere to the Code. Failure to comply could result in disciplinary action. We want everyone to feel confident that they can raise any concerns relating to a breach of the Code, with confidence that any issues raised will be looked into and the appropriate action taken.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE WITH THE CODE OF CONDUCT?

Foxtons is committed to ensuring we maintain a respectful and safe working environment, and that we adhere to our legal and ethical obligations to all employees, customers and business partners. Under the headings "How does Foxtons demonstrate compliance?" we have, for each element, set out the ways the business monitors ongoing compliance with the Code.

WHAT ADDITIONAL SUPPORT OR INFORMATION IS AVAILABLE TO EMPLOYEES?

Details of where to find additional guidance on each of the key policy areas included in this Code can be found under the "What specific guidance is available to employees?" heading within each section. This guidance includes details of key relevant policies or procedures.

INTRODUCTION TO OUR CODE OF CONDUCT CONTINUED

HOW DOES THE CODE OF CONDUCT INTERACT WITH EXISTING POLICIES, PROCEDURES AND VALUES?

The Code of Conduct sets out the rules we must all follow and the high standards of behaviour expected of each of us. The Code is supported by established policies and procedures that are readily available to employees through the intranet. Underpinning everything are our values, these promote a collaborative environment to achieve personal and organisational goals.

CODE OF CONDUCT

Our **Code of Conduct** outlines our commitments and responsibilities to ensure our employees operate to high standards of professional and personal conduct and are compliant with relevant laws, industry standards and stakeholder expectations.



POLICIES & PROCEDURES

Policies give further details on the commitments and responsibilities made by Foxtons. Procedures give further information to support employees in complying with our Code of Conduct.

OUR VALUES

Our values guide our employees in their contributions towards Foxtons' success, support business growth, and promote a collaborative environment to achieve our goals.



THE IMPORTANCE OF SPEAKING UP



Foxtons is committed to fostering a transparent, safe and supportive workplace environment. Our speak up policy outlines the various ways in which employees can report their concerns.

As a company we aim to empower our employees to use the avenues available to them to ensure that any issues an employee may encounter within the company can be raised openly, without hesitation or fear of retaliation and be confident that they will be heard and acknowledged.

Foxtons does not tolerate retaliation against, or the victimisation of, any employee with concerns or questions regarding a potential violation of the Code of Conduct, or any breach of a Foxtons policy that the employee reasonably believes to have occurred.

This policy applies to all employees within Foxtons, including temporary staff, and covers the reporting of incidents relating to harassment, discrimination, illegal activities, and any other form of wrongdoing in the workplace.



HOW TO SPEAK UP

CONTACT

You may report concerns to your manager, director, HR contact, or directly to the Chairman (Nigel.Rich@Foxtons.co.uk) or Senior Independent Non-Executive Director (Rosie.Shapland@Foxtons.co.uk). For whistleblowing disclosures or anonymous reporting, please contact Safecall, our third-party hotline provider, at www.safecall.co.uk or 0800 915 1571.





SUPPORT

A confidential employee assistance helpline is available for anyone who feels they need extra support from third-party trained specialists. (24/7 freephone: **0800 328 1437**; www.employeeassistance.org.uk).

CONNECT

Concerns are forwarded to the HR Director or the relevant Non-Executive Board member for investigation and appropriate action.





INVESTIGATE

When a concern has been raised it will be fully investigated by the either HR or a Non-Executive Board member. By design, this will be a highly confidential and impartial process.

ACT

Following the investigation, we will use our internal polices and processes to decide the appropriate action.





PROTECT

Foxtons does not tolerate retaliation or victimisation against anyone who raises concerns in good faith.



CONFIDENTIAL, ANONYMOUS THIRD-PARTY WHISTLEBLOWING SERVICE

Contact Safecall on: **0800 915 1571** or report on line at: **www.safecall.co.uk/report**.

All calls are treated confidentially by Safecall and you may remain anonymous if you wish.



OUR VALUES

Our values are closely aligned with our Code of Conduct, designed to inspire employees to embrace innovation, maintain professionalism, pursue ambition, and consistently strive for outstanding results, all while offering informed perspectives on the market.

These values serve as a foundation for our staff, guiding their contributions to Foxtons' achievements, driving business development, and nurturing a spirit of teamwork to realise our shared objectives.

AMBITIOUS



LIR CAREERS ARE RUILT ON DELIVERING EXCEPTIONAL RESULTS FOR OUR CUSTOMERS

AUTHORITATIVE



WE USE OUR KNOWLEDGE AND SKILLS TO GAIN OUR CUSTOMERS' TRUST

INNOVATIVE



WE CONSTANTLY STRIVE TO THINK OUTSIDE THE BOX

PROFESSIONAL



WE WORK TO THE HIGHEST PROFESSIONAL STANDARDS IN ALL THAT WE DO

RELENTLESS



WE ARE COMMITTED TO DELIVERING CONSISTENTLY

OUR VALUES ARE UNDERPINNED BY RESPECT, HONESTY AND INTEGRITY

OUR VALUES CONTINUED

OUR VALUES - WHAT THEY MEAN

AMBITIOUS OUR CAREERS ARE BUILT ON DELIVERING EXCEPTIONAL RESULTS FOR OUR CUSTOMERS

WE STRIVE TO ACHIEVE MORE THAN OUR CUSTOMERS

THOUGHT POSSIBLE

WE SEEK OPPORTUNITIES TO BUILD LASTING

RELATIONSHIPS AND CUSTOMER LOYALTY

WE ARE A MERITOCRACY, PROMOTING PEOPLE THAT LIVE

AND BREATHE OUR VALUES

AUTHORITATIVE WE USE OUR KNOWLEDGE AND SKILLS TO GAIN OUR CUSTOMERS' TRUST

WE ARE EXPERTS IN WHAT WE DO, AND TACTIFULLY

CHALLENGE WHEN NECESSARY

OUR PEOPLE ARE PASSIONATE ABOUT BEING LOCAL

EXPERTS IN THEIR COMMUNITIES

OUR NETWORK-WIDE EXPERTISE ENABLES US TO DELIVER

EXCEPTIONAL SERVICE

INNOVATIVE WE CONSTANTLY STRIVE TO THINK OUTSIDE THE BOX

OUR PEOPLE REFRAME THE PROBLEM TO

FIND THE BEST SOLUTION

WE CONSTANTLY PROVIDE FRESH IDEAS TO OUR

CUSTOMERS TO STAY AHEAD

WE AIM TO OFFER 5 STAR SERVICE THROUGHOUT

THE CUSTOMER LIFECYCLE

PROFESSIONAL WE WORK TO THE HIGHEST PROFESSIONAL STANDARDS IN ALL THAT WE DO

WE CONSISTENTLY MAINTAIN THE HIGHEST LEVELS

OF BUSINESS ETHICS

WE STRIVE TO CREATE AN INCLUSIVE, RESPECTFUL

AND SUPPORTIVE WORK ENVIRONMENT

WE ACTIVELY SEEK CUSTOMER FEEDBACK TO IMPROVE

AND DELIVER OUTSTANDING PERFORMANCE

RELENTLESS WE ARE COMMITTED TO DELIVERING CONSISTENTLY

WE WORK TOGETHER AS A TEAM TO ENSURE

WE GET THE JOB DONE

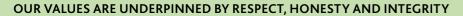
WE ARE RELENTLESS IN OUR COMMITMENT TO

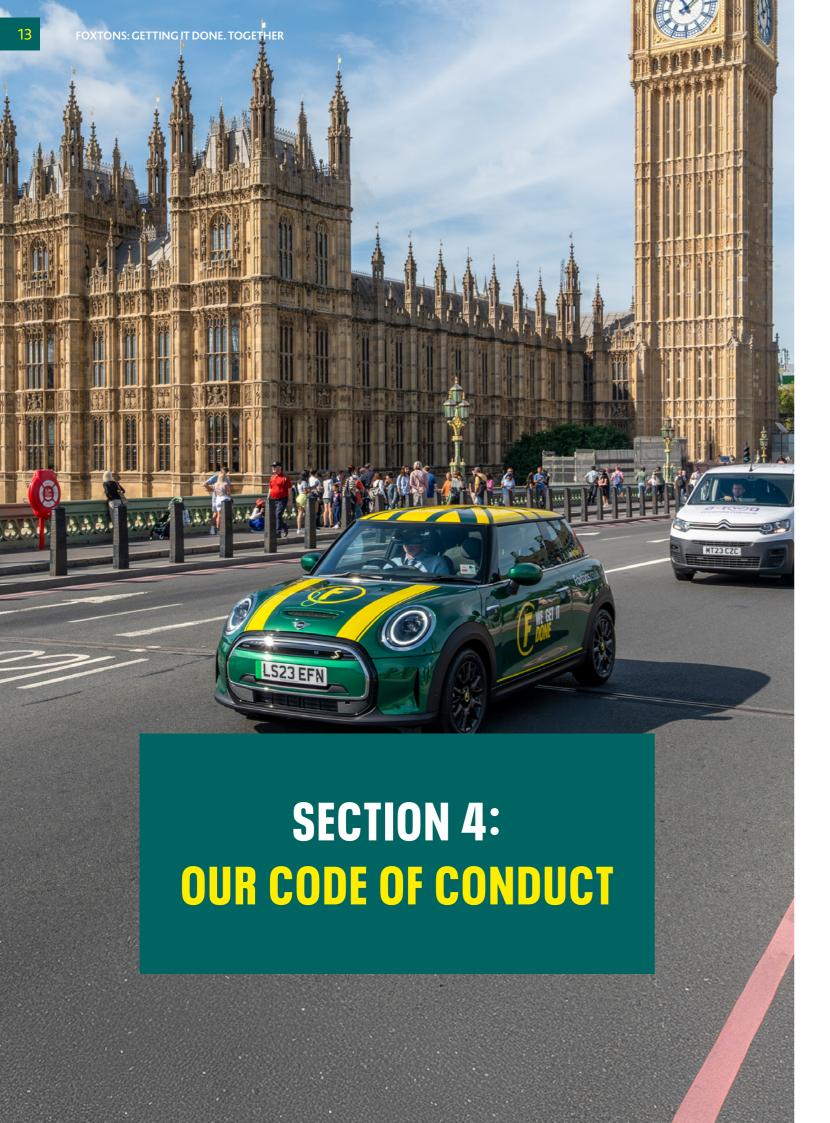
HIGH STANDARDS

WE DON'T GIVE UP WHEN IT'S NOT GOING TO PLAN,

WE TAKE INITIATIVE TO PUT IT RIGHT



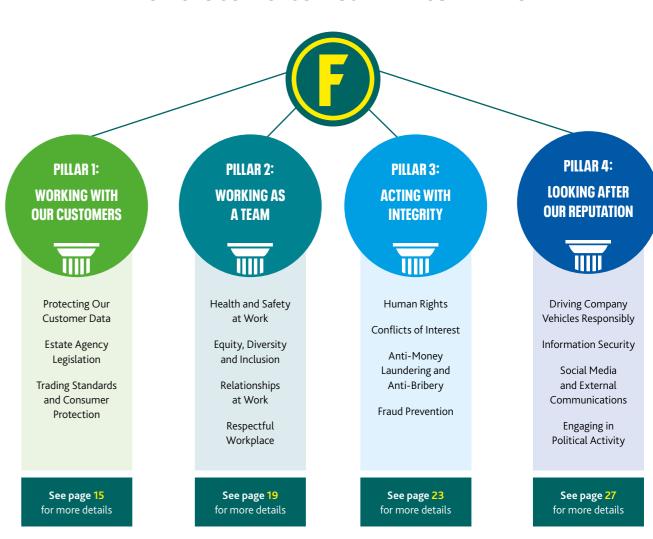




OUR CODE OF CONDUCT

Our Code of Conduct consists of 15 elements sitting under the four pillars as set out below. Each element is presented below the relevant pillar. Further detail on each element follows on the subsequent pages of this document.

FOXTONS CODE OF CONDUCT - THE FOUR PILLARS



PILLAR 1: WORKING WITH OUR CUSTOMERS



PROTECTING OUR CUSTOMER DATA

WHAT IS FOXTONS' COMMITMENT?

Foxtons is committed to complying with all applicable data protection and privacy legislation. We take appropriate measures to keep personal data safe, secure and protected against unauthorised access. We will only use personal data of customers and other parties in a fair, lawful and transparent manner. We respect and comply with individual data protection and privacy rights.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

- Ensure you understand and comply with relevant Foxtons' policies and complete mandatory training every year.
- Report any known or suspected data breaches to privacy@foxtons.co.uk or to the Data Protection Officer directly.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- Our privacy policy explains how we use personal data.
- · We deliver online and classroom data protection training.
- We have clear and easy-to-use channels for reporting data protection breaches.
- We have undergone independent audits on our data protection procedures.



What specific guidance is available to employees?

Data protection and privacy policy.

Computer network and internet end user policy.

ESTATE AGENCY LEGISLATION

WHAT IS FOXTONS' COMMITMENT?

Foxtons complies with all applicable estate agency laws to ensure we uphold high standards of professionalism, compliance and customer service across all our operations. We have a commitment to ethical standards and expect everyone working under our brand to promote these standards

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

- Ensure you fully understand all areas of compliance that you are trained on.
- Act as an ambassador for Foxtons, upholding the highest ethical standards at all times.
- Make sure you report any suspected non-compliance to your manager or via the other available Speak Up channels.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- Our compliance team routinely check transactions to ensure they comply with anti-money laundering law.
- Any of our employees can contact our in-house legal team for advice.
- We routinely horizon-scan for new legislation and then build this into our procedures.
- Our handbooks and policies (available on our intranet) set out the standards with which employees are expected to comply in these important areas.
- We train our staff on new and existing laws and demonstrate this via training records.



What specific guidance is available to employees?

Training materials summarising key areas of relevant law, including the Estate Agents Act 1979, Housing Act 2004 and the Tenant Fees Act 2019.

"Integrity, credibility and professionalism is key to us and our customers. At Foxtons we are members of six professional bodies that provide sellers, buyers, landlords and tenants with an assurance that they will receive the highest level of customer service."

Fran Giltinan, Managing Director of Property Management and Customer Experience



PILLAR 1: WORKING WITH OUR CUSTOMERS

TRADING STANDARDS AND CONSUMER PROTECTION

WHAT IS FOXTONS' COMMITMENT?

Foxtons is committed to trading safely and legally and ensuring that we put the customer at the heart of everything we do. We achieve this by complying with all applicable legislation and regulations on trading standards and consumer protection.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

- Ensure you understand and comply with applicable Foxtons' policies and guidance.
- Undertake all applicable training.
- Seek advice from your manager or the legal department as and when you need it.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- We are a proud member of The Property Ombudsman's Redress Scheme.
- We have a clear complaints procedure that allows us to investigate and respond to customer service issues.
- We train our staff on new and existing laws and demonstrate this via training records.

 This includes, but is not limited to, material information requirements when describing a property.
- We ensure we disclose to our customers any potential conflict of interest.

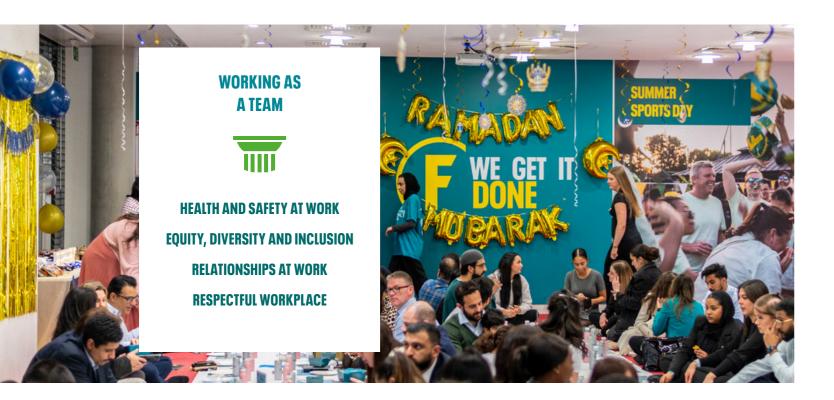


What specific guidance is available to employees?

Property Ombudsman codes of practice (Sales and Lettings). Specific in-house training materials.



PILLAR 2: WORKING AS A TEAM



HEALTH AND SAFETY AT WORK

WHAT IS FOXTONS' COMMITMENT?

Foxtons is committed to providing a healthy and safe working environment for staff and visitors in compliance with the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations. We do this by managing health and safety risks arising from our activities, providing adequate training to staff, and regularly reviewing our Health and Safety Policy.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

It is employees' responsibility to take reasonable care for their own health and safety and others whilst at work. Any health and safety incidents should be reported through the Assure platform.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- The Health and Safety committee meets regularly to review risk, review workplace incidents and review relevant policies.
- · Regular fire, health and safety inspections in all our offices.
- Our online "Assure" incident reporting platform allows employees to report safety incidents which are regularly reviewed so changes can be made where necessary.



What specific guidance is available to employees?

Health and safety policies. Fire risk assessments.

Specific personal safety guidelines, including lone working safe practices.

EQUITY, DIVERSITY AND INCLUSION

WHAT IS FOXTONS' COMMITMENT?

We are an equal opportunity employer that is committed to equity, diversity and inclusion (EDI). We recognise that representation and allyship enables us to reflect and serve the communities where we operate. We believe in the value of difference, and we know that cultivating an inclusive culture helps us to benefit from those differences. Our vision is to create a vibrant place to work where differences are recognised as a strength and where talented people can flourish and achieve their highest potential. Attracting, retaining, developing and engaging a diverse workforce is central to our meritocratic approach; we want the best people who have shared values with Foxtons.

We champion all forms of diversity, and our official networks, Women@Foxtons, AfroFoxtons and LGBTQ+, play a crucial role in ensuring our employees feel included, represented, and empowered to be their authentic selves at Foxtons. In 2024, we conducted various surveys to gauge interest in expanding our networks and celebrating cultural events.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

Employees are expected to always do their best to support a fair and inclusive workplace. Our managers are to lead the way in doing the right thing, ensuring employees are given a fair and equal chance to fulfil their potential by making objective decisions that are also free from prejudice.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- We maintain a range of Speak Up channels, including an independent anonymous third part helpline, which are easily accessible to all employees.
- We take seriously any allegations of bullying or harassment and always fully investigate matters when reported.
- The employee led EDI Committee and the Board's ESG Committee meet regularly to review the effectiveness of EDI programmes and practices.
- We strive to maintain fair recruitment and promotion practices that are free from bias.



What specific guidance is available to employees?

EDI policy.

A range of policies that support EDI within the employee handbook.

"I believe that having a successful career is reliant upon everyone creating a truly diverse and inclusive environment where broad perspectives are embraced, and people can be themselves."

Fizah Hoda, Director of Learning and Development & EDI



PILLAR 2: WORKING AS A TEAM



RELATIONSHIPS AT WORK

WHAT IS FOXTONS' COMMITMENT?

We are committed to ensuring that any personal relationships amongst team members are disclosed and treated with transparency to avoid any conflicts that may affect our business. Any information regarding personal relationships will be kept confidential and in line with our data protection policy.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

To ensure that we can deal with any potential issues that may arise from a personal relationship, employees should:

- Disclose any personal relationships in line with the framework set out in the relationships at work policy.
- Continue to conduct yourself in a professional manner at work at all times.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

We ensure we maintain transparency and deal with any issues objectively and consider any potential risk arising from personal relationships.



What specific guidance is available to employees? Relationships at work policy.

RESPECTFUL WORKPLACE

WHAT IS FOXTONS' COMMITMENT?

The wellbeing, safety, and dignity of every employee is a top priority. We are committed to maintaining a respectful workplace, and we do not tolerate any form of bullying, harassment or inappropriate behaviour, whether directed at employees, customers, suppliers, or others. Any employee found to have engaged in such conduct may face serious consequences, including disciplinary action, dismissal, or legal proceedings.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

Creating a respectful environment is a shared responsibility guided by the following key areas:

- Foster a welcoming and respectful environment by treating others as you would like to be treated
- Avoid any behaviour that could be perceived as hostile or intimidating, including inappropriate jokes or comments.
- Refrain from spreading rumours or gossip that could be considered offensive, defamatory, or harassing.
- Maintain professional conduct at all company-related events, including social gatherings such as company trips and team celebrations.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- Our speak up policy encourages transparency, and specifically our anonymous and confidential third party whistleblowing hotline empowers employees to report their concerns safely and with confidence.
- Mandatory annual training for all 1,500 of our employees, including our Board members, focused on fostering a respectful and inclusive workplace.
- The Board's ESG Committee regularly reviews respectful workplace matters and performance metrics.



What specific guidance is available to employees?

Employee handbook.

Training materials focussed on fostering a respectful and inclusive workplace. Bullying and harassment policy.

Speak up policy.

PILLAR 3: ACTING WITH INTEGRITY



HUMAN RIGHTS

WHAT IS FOXTONS' COMMITMENT?

Foxtons is committed to respecting internationally recognised human rights in line with the principles and guidance contained in the United Nations Guiding Principles on Business and Human Rights. Foxtons will not tolerate or condone any abuse of human rights within its operations, supply chains or business partners.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

- Ensure you understand and comply with Foxtons' human rights related policies.
- If you are aware of any human rights abuses or have any concerns, notify your manager,
 HR or use any of our Speak Up channels.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

• Reporting any instances of human rights/modern slavery concerns that we are made aware of.



What specific guidance is available to employees?

Modern slavery statement. Speak Up policies

CONFLICTS OF INTEREST

WHAT IS FOXTONS' COMMITMENT?

We ensure that no business dealings on behalf of Foxtons will be inappropriately influenced by personal considerations or personal relationships.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

- To seek written advice from your director in advance about any issue where you have an actual or potential conflict of interest.
- You must withdraw from decision-making that creates or could create any actual or potential conflict of interest.
- You should always be aware of potential conflicts that may exist or occur at the earliest opportunity and seek to avoid them.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- We set out the conduct standards required of our employees in relation to any bribes, incentives or gifts they may be offered in exchange for their services.
- We have clear reporting channels so that our employees can report any potential conflicts.
- Our compliance team receive and monitor these reports for audit purposes.



What specific guidance is available to employees?

Employee handbook.



PILLAR 3: ACTING WITH INTEGRITY

ANTI-MONEY LAUNDERING AND ANTI-BRIBERY

WHAT IS FOXTONS' COMMITMENT?

Foxtons operates in compliance with applicable anti-money laundering and anti-bribery laws and we operate a zero-tolerance approach to bribery and corruption. We have controls and monitoring systems in place aimed at identifying, assessing and mitigating the risk of money laundering and bribery within our business.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

- Employees shall ensure that they meet their personal obligations on anti-money laundering and bribery prevention as appropriate to their role and position within Foxtons.
- Commercial and financial considerations shall never be permitted to take precedence over anti-money laundering and bribery prevention laws and regulations.
- Employees shall report issues of suspected money laundering or bribery to the MLRO and assist and cooperate in any investigation.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- · We train all our relevant employees in this area.
- Our compliance team regularly check performance levels in this area and report at regular intervals to the Anti-Money Laundering Committee.
- · Any instances of whistleblowing are fully investigated.



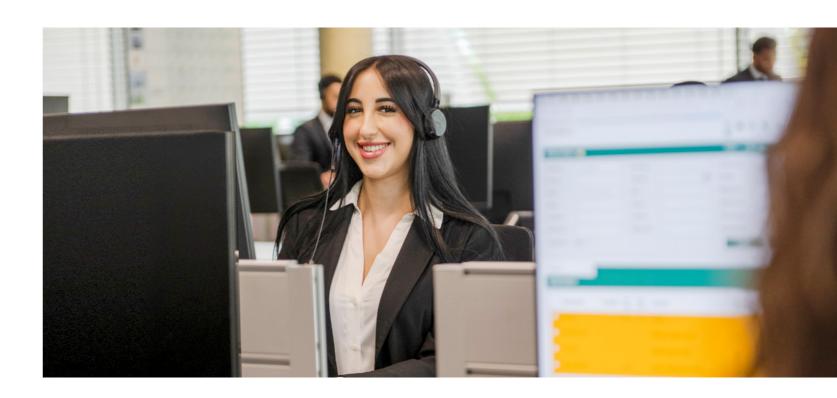
What specific guidance is available to employees?

Anti-money laundering, financial sanctions & bribery prevention policy and procedures.



"Anti-money laundering isn't just about compliance, it's a commitment to integrity, transparency and protecting our business and the financial system from abuse by criminals and their networks."

Manjit Kataora,
Director of Legal and Compliance



FRAUD PREVENTION

WHAT IS FOXTONS' COMMITMENT?

We are committed to protecting our customers, employees and our brand from fraudulent activity in whatever form it takes. Our policies, procedures and controls seek to mitigate the risk of fraud in our day-to-day activities but recognise these may not always prevent all fraudulent acts. We therefore also rely on our employees to identify and report suspected fraud, either through their line management or established confidential reporting processes.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

All employees have a responsibility to be aware of what is happening around them to help prevent and detect fraud. Any wrongdoing by the company, its employees and other stakeholders must be reported.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- Investigating any fraud related matters detected through established mechanisms.
- Regular review of the effectiveness of our fraud risk management policy.
- Completes regular fraud risk assessments that are reviewed by the Audit Committee.



What specific guidance is available to employees?

Fraud risk management policy.
Speak up policy.

PILLAR 4: LOOKING AFTER OUR REPUTATION



DRIVING COMPANY VEHICLES RESPONSIBLY

WHAT IS FOXTONS' COMMITMENT?

Company vehicles are used in the day-to-day operations of our business, including transporting customers to property viewings and carrying out property inspections. We are committed to ensuring our fleet is operated safely and responsibly in the interests of our employees, customers and the general public. To support this, we have a series of protocols and technical safety measures including in-vehicle dashcams, telematics and comprehensive vehicle policies.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

- To drive in a safe and lawful manner when driving on company business.
- To be responsible for the day-to-day maintenance, care and safe operation of your vehicle.
- Adhere to vehicle policies and attend required training courses.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- Centrally managed fleet maintenance with regular vehicle inspections undertaken.
- Maintain a comprehensive set of vehicle policies and training materials, covering driver behaviour and responsibilities.
- Ongoing driver safety training utilising dashcams and vehicle telematics for monitoring driver behaviour.



What specific guidance is available to employees?

Vehicle policy.
Driver training modules.

INFORMATION SECURITY

WHAT IS FOXTONS' COMMITMENT?

Foxtons aims to implement, support, and maintain information security practices that protect the confidentiality, integrity, and safety of its information, data, and systems.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

- Ensure understanding of all relevant policies for this area.
- Use information systems in accordance with mandatory practices.
- Complete required training courses on information security and cyber security.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- · Investing in advanced information and cyber security systems.
- Regularly training all employees on key information security practices.



What specific guidance is available to employees?

Use of internet, mobile phones, access fobs and computer network end user policy.

Cyber security training modules.

Artificial intelligence usage policy.

"Our data and technology is at the core of everything we do, and it's what makes us different. Keeping our data and infrastructure safe has never been more important than right now to protect us and our customers."

Imran Soomro, Chief Information and Technology Officer



PILLAR 4: LOOKING AFTER OUR REPUTATION



SOCIAL MEDIA AND EXTERNAL COMMUNICATIONS

WHAT IS FOXTONS' COMMITMENT?

Foxtons recognises that employees regularly use social media, which can be a powerful tool for engaging with customers and each other. Our acceptable use policy applies to all employees and outlines appropriate social media conduct as brand representatives. It aims to protect the business and employees from potential disciplinary or legal issues caused by irresponsible online activity.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

- Comply with the social media and press commentary policy.
- Ensure that you speak to a member of the marketing team before posting anything on social media in regards to your working life at Foxtons.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

- Maintains systems and processes to ensure that online content posted by the company or employees regarding Foxtons meets acceptable standards.
- · Engages with external media through a centralised press team.



What specific guidance is available to employees?

Social media and press commentary policy.

ENGAGING IN POLITICAL ACTIVITY

WHAT IS FOXTONS' COMMITMENT?

As a business Foxtons is apolitical. Staff engaging in political support, affiliation or activity may impact our damage our reputation for impartiality. This includes matters of national political controversy.

WHAT ARE EMPLOYEES' KEY RESPONSIBILITIES?

You must avoid any suggestion that Foxtons supports or endorses your political activity. This means:

- You must not engage in political activity during working hours, or using company premises, systems, or resources.
- · You must make it clear that your involvement is solely in a personal capacity.
- Do not link your employment at Foxtons to your political actions.
- Refrain from public statements on national political controversies, including on social media.

HOW DOES FOXTONS DEMONSTRATE COMPLIANCE?

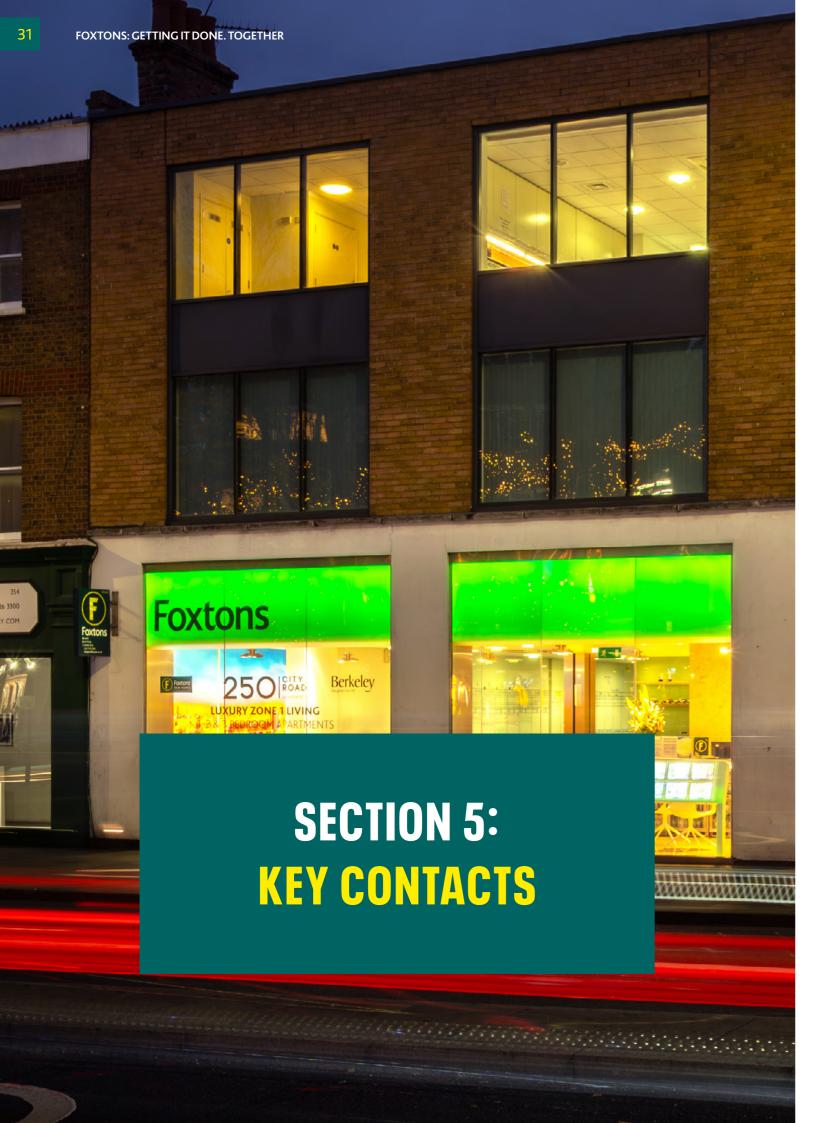
- Maintains systems and processes to ensure that online content posted by the company or employees regarding Foxtons meets established standards.
- · Engages with external media outlets through the centralised press team.



What specific guidance is available to employees?

Engaging in political activity guidelines.
Employee handbook.





KEY CONTACTS

Thank you for taking the time to review this document. At Foxtons we have a range of experts across the business that can discuss any of the subjects outlined with you.

Here are the contact details for some key individuals should you need them.



NATALIE BOOTH

HR Director

07875 808 076

Natalie.Booth@foxtons.co.uk



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07875 800 314

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