

the **CODE**  
of ethics



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# A Message from our Chief Executive Officer and President



As the leading residential real estate services company in the United States, our work empowers real estate professionals to guide consumers in their journey to buy or sell a home, often one of the largest transactions in someone's life.

People trust Anywhere Real Estate Inc. ("Anywhere"), our brands, and our businesses, not only because of our valuable expertise, but also because integrity and excellence are at the heart of everything we do. In fact, we set out to make ethics the cornerstone of our company culture, and it is the driving principle behind how we operate our businesses.

Every day, we work to ensure we treat affiliated agents, owners, customers, and each other with respect and dignity. We are focused on operating with a fundamental mindset of doing the right thing – because a strong ethical foundation is critical to our success.

This mindset is more important now than ever before as we meet the changing needs of those we serve in an ever-evolving world, whether it's the accelerated adoption of new technology and data products or our teams finding new ways of working together.

Integrity matters, and that's why we ask every employee to understand the importance of our dedication to ethical business practices. This approach is embodied within our Code of Ethics, which provides guidance on company policies, insight on legal regulations and resources for help and support.

Your understanding of our Code of Ethics has a direct impact on our success as a company, and I encourage you to read on to learn more about how you can uphold these values.

I am incredibly proud of the work you do, and I want to thank you for your commitment to Anywhere and for taking time to read and understand our Code of Ethics.

*Ryan Schneider*

Chief Executive Officer and President

## A Message from our Chief Ethics & Compliance Officer



Anywhere is one of the most respected names in the real estate industry, not only for what we do, but for how we do it – with the highest level of integrity. As an industry leader, our transparent and honest approach to conducting business earns us the trust and respect of customers, franchise owners, affiliated agents, suppliers, and each other.

Our Code of Ethics reflects our unwavering commitment to maintaining high ethical standards and serves as a guide to help us make decisions that are consistent with our core values. Broadly speaking, our Code of Ethics, together with our Key Employment Policies, sets forth our standards of workplace conduct and embodies the principles on which our company operates. Keep in mind that the Code of Ethics may not provide specific guidance for every potential situation, but it should serve as a resource to regularly guide you in making responsible and ethical business decisions.

At Anywhere, we operate with the fundamental belief in doing the right thing, the right way, and at the right time. We have created a culture of accountability based on these high ethical standards. Each of us, individually and collectively, is responsible for maintaining our shared commitment to business integrity and our hard-earned reputation for winning the right way. We should take great pride in our accomplishments and continue to strive to raise the bar.

Thank you for your commitment to our principles, to our Code of Ethics and for everything you do to make Anywhere a great place to work.

*Shacara Delgado*

SVP, Employment Law and Chief Ethics & Compliance Officer

# Our Values In Action

Our core values drive our business. We live our values and ensure that we treat each other, as well as our affiliated agents, customers, suppliers, partners and shareholders with respect and dignity. Our values serve as the foundation of our Code of Ethics and support our culture of integrity. This transparent and honest approach to our business bolsters our excellent reputation in the global market and is essential to our continued success as a leader and trusted provider of real estate services.

With our many successful business units operating around the country and the world, Anywhere works to unify employees as a collective team, dedicated to a single set of core values that define our culture and unite our company around our core strategy – to serve the agents who serve the public.



## Our core values begin and end with our people



# About the Code of Ethics

The Code of Ethics applies to all employees worldwide who work for Anywhere or one of its subsidiaries. We rely on every employee to contribute to our culture of integrity and to uphold our core values by following the Code of Ethics in both letter and spirit and demonstrating integrity at all times. Keep in mind that employees must comply with the Code of Ethics and all company policies, as well as the policies of the business units in which they work.

## As leaders, managers have the further responsibility to embed a culture of compliance into our business by:

- Leading by example and modeling the highest standards of ethical business conduct.
- Serving as a valued resource and ensuring that employees understand and abide by the Code of Ethics.
- Reinforcing the Code of Ethics with employees and business partners by explaining how the policies apply to their daily work and answering questions and concerns.
- Seeking opportunities to promote business integrity by actively discussing ethically challenging situations with their teams.
- Creating an environment of trust and open communication where employees feel comfortable raising concerns without fear of retaliation.
- Supporting employees who report an issue or concern and proactively guarding against retaliation.

These principles also apply to our business relationships. We expect our vendors, independent contractors and other third parties with whom we work to live up to these values under our [Vendor Code of Ethics](#), which is publicly available on our website, [Anywhere.re](#).

While the Code of Ethics provides guidance in many important areas covered by company policy and applicable law, it may not address every situation. The principles of the Code of Ethics are guidelines to help us exercise sound judgment. We trust each other to follow the letter and spirit of the law and policy. This means that we must act with integrity, honesty and fairness even in situations that are not explicitly addressed in the Code of Ethics.



## Does the Code of Ethics apply to every business unit, including local operating companies, subsidiaries and brands?

Yes. The Code of Ethics provides the standard of conduct for all of our businesses and brands around the world—including every business unit, subsidiary and local operating company. Business units may also establish standards of conduct for its employees in addition to the Anywhere Code of Ethics.

## What if my business unit has a policy that differs from the Code of Ethics?

The Code of Ethics sets the minimum standards for all of our businesses around the world. If your business unit has another policy with stricter standards of conduct than those set forth in the Code of Ethics, follow that policy. However, if you find that your business unit's additional policy contradicts or appears less stringent than the Code of Ethics, please raise the issue with your manager, Human Resources Business Partner, or the Ethics & Compliance department. You can also contact the Code of Ethics Line at [theline.anywhere.re](mailto:theline.anywhere.re) or 1-866-495-CODE (2633).

# Seeking Guidance and Reporting Concerns

Anywhere employees are responsible for shaping the company's mission and values every day. We rely on one another to act both legally and ethically when dealing with each other, clients, franchisees, affiliated agents, customers, vendors and our community. Maintaining our company's integrity requires that all employees speak up when there are any concerns that unethical or unlawful behavior may be taking place.

Situations involving the law and regulatory compliance can be complex. There may be times when the right business decision is not readily apparent.

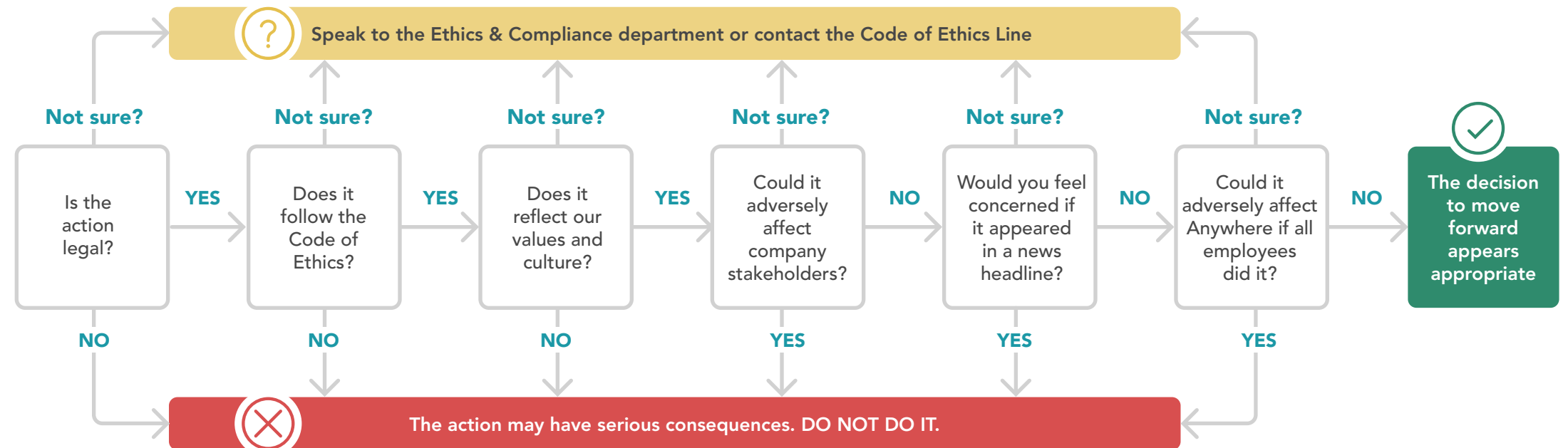
Many resources are available to help answer your questions, including:

- Your manager
- Your Human Resources Business Partner
- The Ethics & Compliance department

You can also contact the Code of Ethics Line at: [theline.anywhere.re](http://theline.anywhere.re) or 1-866-495-CODE (2633).

Following the decision process below can also be a simple way to help choose the right course of action.

## Ask yourself:





## Our Speak Up Culture

Anywhere maintains an open communication culture where we each can speak up about compliance or other issues. Our culture encourages us to take action by speaking with managers, Human Resources Business Partners, the Ethics & Compliance department or the Anywhere Code of Ethics Line about potential ethical or legal violations. Whenever you have questions or are unsure whether a course of action is appropriate, we encourage you to seek guidance from any of these available resources.



**I think one of my coworkers is falsifying time records. Who should I talk to about this?**

*Our speak up culture empowers you to speak up when something does not seem right. Your manager is often a good resource to turn to first to address compliance or ethics issues, however, many other resources, including your Human Resources Business Partner or the Ethics & Compliance department are also available and ready to assist you. In any case, the right choice is the one that is most comfortable for you.*

## Our No Retaliation Policy

Anywhere is committed to providing a safe environment for employees to voice any concerns and to protect employees from any retaliation for making a good faith report. For more information, consult the Anywhere [No Retaliation Policy](#), found in the Key Employment Policies.



**Anywhere prohibits any form of retaliation to be taken against any employee who makes a good faith report.**

**I recently reported a concern about a potential violation of law I observed at work. Now I feel like my coworkers are avoiding me. How do I know if I am experiencing retaliation?**

*Retaliation can take many forms, such as harassment, intimidation, exclusion from work-related or social activities and unfavorable work assignments. Our company is committed to providing a safe environment for employees to speak up when they have concerns and does not tolerate retaliation of any kind. If you think that you have faced retaliation, we encourage you to raise the concern to your manager, Human Resources Business Partner, or the Ethics & Compliance department. You can also contact the Code of Ethics Line at: [theline.anywhere.re](https://theline.anywhere.re) or 1-866-495-CODE (2633).*



# Our Code of Ethics Line

## What Happens When a Report is Made

The Anywhere Code of Ethics Line is managed by an outside vendor and is available toll-free 24 hours, 7 days a week for all employees. The Code of Ethics Line does not record or trace calls, or use any identity tracking technology. You may remain anonymous where permitted by local law, whether you call the Code of Ethics Line or make the report online.

When you call the Code of Ethics Line, an operator will ask questions to obtain the details of your concern and will document the call. You will receive a report number, which you can use later to add details or to check the status of your report. You should provide as much detail as possible when raising a concern, including the parties involved, relevant dates, and the specific conduct at issue. Based upon the nature of the allegation, the report will be assigned to an investigator and will be handled appropriately.

Due to confidentiality and other reasons, Anywhere generally does not disclose the specific details of any internal investigation. However, you may contact the Code of Ethics Line to get the status of your report. All reports are handled with the utmost care to maintain the confidentiality and privacy of the parties.

We are here to listen. The Anywhere Ethics & Compliance department is responsible for the Code of Ethics Line, which is available 24/7 and can be accessed online by visiting [theline.anywhere.re](https://theline.anywhere.re) or by telephone. Dial 1-866-495-CODE (2633) if calling within the United States or Canada, or find your country-specific access code on [theline.anywhere.re](https://theline.anywhere.re). You can also make a report in your local language. If you have questions about how the Code of Ethics Line is handled in your country, please contact the Ethics & Compliance department at [Ethics.compliance@anywhere.re](mailto:Ethics.compliance@anywhere.re). In addition, a list of Ethics & Compliance contacts can be found at the end of this document.

# OUR RESPONSIBILITIES TO EACH OTHER

**Maintaining a respectful, fair and productive work environment.**

In addition to the Code of Ethics, Anywhere maintains [Key Employment Policies](#) that provide more detailed guidance on the responsibilities we have to each other. These policies establish our commitment to providing a safe and respectful work environment free of discrimination and harassment, and set forth our responsibilities for safeguarding their workplace.

All employees are expected to comply with the Key Employment Policies and to consult with their manager or Human Resources Business Partner with any questions regarding these policies.



# Commitment to Equal Employment Opportunity

At Anywhere, we treat each other with respect, and do not tolerate any discrimination based on **protected characteristics** in any of our **employment practices**.

Our [Equal Employment Opportunity Policy](#) in the Key Employment Policies provides further detail about our commitment to these goals and our compliance with employment laws. If you witness or experience discriminatory or harassing behavior in the workplace, we encourage you to report it to your manager, Human Resources Business Partner, or the Ethics & Compliance department. You can also contact the Code of Ethics Line at: [theline.anywhere.re](mailto:theline.anywhere.re) or 1-866-495-CODE (2633).

## Intolerance of Favoritism

We are committed to treating all employees fairly and impartially in all our employment practices. Our culture rewards employees based on their merit, job performance and accomplishments. We do not allow any form of favoritism, based solely on personal, social or financial relationships to influence employment practices. We work to address situations where either actual or perceived favoritism may exist and we do not allow or give preferential treatment to our clients, vendors, affiliated agents or any other third parties based on personal, social or financial hardship. For more information about reporting and addressing these issues, see the [Personal Relationships and Perceptions of Favoritism Policy](#) in the Key Employment Policies.



### KEY TERMS

#### PROTECTED CHARACTERISTICS

*A legally protected characteristic may include, but is not necessarily limited to, race, color, religion, national or ethnic origin, citizenship, age, sex, gender, sexual orientation, gender identity, gender expression, veteran status, uniformed service member status, marital status, family status, disability, pregnancy, genetic information and any other characteristic protected under applicable laws and regulations.*

#### EMPLOYMENT PRACTICES

*Includes all aspects of employment, such as recruitment, hiring, performance management, compensation, job assignment, business travel, training, promotion, discipline and termination.*

# Freedom from Discrimination, Harassment and/or Retaliation

All Anywhere employees have a right to work in an environment that is free of harassment and discrimination. Discriminatory, harassing or retaliatory conduct is not only illegal, but also creates an unproductive, unpleasant and sometimes even hostile work environment.

To that end, Anywhere prohibits discrimination against any employee or applicant for employment based on any legally recognized basis. Moreover, we are all responsible for maintaining a productive work environment free of **harassment**.

We treat each other with respect and do not tolerate harassment in any form against an employee, client, vendor, affiliated agent or other third party. If you witness or experience harassment of any kind in the workplace, you must report it to your manager, Human Resources Business Partner, or the Ethics & Compliance department. You can also contact the Code of Ethics Line.

Remember, you can make a report without fear of retaliation because Anywhere strictly prohibits retaliation of any kind against a person who raises concerns or reports an issue in good faith, or who participates in an internal investigation of such a report.

We all must understand and comply with the Anywhere [Prohibited Harassment Policy](#) in the Key Employment Policies.



**My work group, including my manager, often makes sexually explicit jokes that make me uncomfortable, though no one else seems to mind. What should I do?**

*Sexually explicit jokes are a clear violation of our harassment policy and Anywhere does not condone this kind of behavior. If you feel comfortable speaking about the issue with your manager, you can certainly do so. Our open-door communication culture empowers you to raise the concern without fear of retaliation. You can also raise this concern to a Human Resources Business Partner, the Ethics & Compliance department, or the Code of Ethics Line.*



## KEY TERM

### HARASSMENT

*Unwelcome conduct that is based on a protected characteristic, inappropriately and unreasonably interferes with our ability to work, is a condition of employment or creates an intimidating, hostile or offensive work environment. This conduct can be verbal, visual or physical and includes disrespectful or hostile activity such as slurs, negative stereotyping, teasing, bullying (cyber, emotional or physical), exclusion and threats.*

*It can also include requests for sexual favors, sexually explicit language or jokes, displaying sexually suggestive pictures or objects, unwelcome sexual advances, or inappropriate touching.*

## Safe Workplace

We take the safety of our employees very seriously. We are committed to providing a workplace that is free of health and safety hazards. Each of us is responsible for complying with relevant health and safety laws and company policies. If you become aware of an unsafe workplace condition within any Anywhere office, notify your manager immediately.

A safe workplace also extends to our work outside the office. We must act safely and consider the safety of others when performing our work for Anywhere.

## Non-Violent Workplace

Our work environment must be free from violence. We do not allow weapons or explosives on our work premises. We do not tolerate threats, intimidation, aggression or violent behavior of any kind.

If you witness any **behaviors of concern**, or become aware of an unsafe, dangerous or violent situation, promptly report it to your manager, Human Resources Business Partner, or the Ethics & Compliance department. You can also contact the Code of Ethics Line at: [theline.anywhere.re](mailto:theline.anywhere.re) or 1-866-495-CODE (2633). Consult the Anywhere [Non-Violent Workplace Policy](#) in the Key Employment Policies for more information.

Anywhere is committed to maintaining a safe and secure workplace and does not tolerate threats or acts of violence against employees, independent contractors, customers, clients, partners, suppliers, or other persons and/or property. In the event you become aware of any potential threats or acts of violence, immediately report the incident to your local management or law enforcement. In case of an emergency, contact local law enforcement.



### KEY TERM

#### BEHAVIORS OF CONCERN

*Behavioral indicators that can help predict violent behavior. Examples include fits of rage, angry outbursts, statements or behaviors that imply violence, acts of intimidation and preoccupation with vengeance or weapons.*

## Alcohol and Drug-Free Environment

We maintain a work environment that is free of substance use. You may not use, be under the influence of, or possess illegal drugs in the work environment. You must ensure that your performance, safety and judgment are not impaired while performing company work by the use of alcohol, prescription drugs or other legal or illegal substances.

We recognize that alcohol may at times be provided at company-sponsored events or with a business meal. You should ensure that your consumption of alcohol does not impair your performance and judgment while you perform your job and that you behave at all times in accordance with the Anywhere [Standards of Work-Related Behavior Policy](#).

For more information on substance abuse, testing, assistance programs and confidentiality of related information, consult the Anywhere [Drug and Substance Abuse Policy](#). Both policies are included in the Key Employment Policies.



## We Embrace Diversity, Equity & Inclusion

At Anywhere, we believe in diversity of people, ideas and viewpoints and the value diversity brings to our customers and shareholders. As a result, we are committed to creating an inclusive work environment of diverse backgrounds, ethnicities, cultures, ideas, beliefs and experiences that is free from discrimination, harassment and intimidation.

We are committed to providing equal employment opportunities to all of our job applicants. We celebrate the unique qualities, perspectives, and life experiences that define us as individuals and we include individuals of varied races, ethnicities, ages, and genders to help improve the completeness and quality of our workforce.

### REMEMBER



We all have a role in the makeup of our company's culture. We are each responsible for creating and maintaining a respectful, safe and productive work environment where we are proud to work and grow professionally. We are empowered to take action when we experience or witness behaviors that damage this culture.

**We advance equity when we seek diverse perspectives and promote inclusion**

**OUR RESPONSIBILITIES  
TO EACH OTHER**  
■ ■ ■ ■ ■

**AS AN EMPLOYEE...**

**I WILL:**

Treat all coworkers fairly and equally.

Conduct business with clients, vendors, independent contractors and any other third parties based solely on business benefits to Anywhere.

**I WILL NOT:**

Provide or withhold job-related opportunities or benefits to coworkers based on their race, sex, age, religion or any other protected characteristic.

Favor any clients, vendors, independent contractors and any other third parties based on personal, social or financial relationships.

**AS A MANAGER...**

**I WILL:**

Hire employees based on business need and the candidates' qualifications and ability to perform the work.

Take care not to favor, or appear to favor, any employee based on a personal, social or financial relationship outside of work.

Promote, compensate and offer employment privileges to employees based solely on skills, experience and merit.

**I WILL NOT:**

Provide or deny employment opportunity to any candidate based on race, sex, age or any other protected characteristic.

Provide special treatment to any employee based on personal, social or financial relationships.

Provide or withhold promotions, compensation or any other employment privileges to employees based on any protected characteristic.

# PROTECTING INFORMATION

Protecting and securing  
information that belongs to  
employees, clients and Anywhere.





## Safeguarding Employee Information

We value our employees' **personal information** and try to limit what we collect and use to information that is necessary to fulfill our legitimate legal or business objectives. We take steps to ensure our information practices comply with all applicable laws and regulatory requirements. In addition, we limit disclosure of confidential employee records or personal information outside of Anywhere, except as authorized by the employee, to fulfill a legitimate purpose, or as permitted or required by law. Employees with access to confidential employee records bear a special responsibility to avoid unauthorized disclosure of confidential information in those records. This is not in any way intended to prohibit employees from engaging in any protected activity under the National Labor Relations Act, nor are employees prohibited from disclosing their own personal information.

## Safeguarding Client and Customer Information

We value our customer and client information and comply with all laws and regulatory requirements that apply to its collection, use and disclosure. We strive to protect the confidential information of our clients and customers and safeguard their confidential personal information against unauthorized access, use or disclosure. Under no circumstances are employees permitted to use or disclose customer or client information for the benefit of third parties, including prospective or future employers. You should contact the Ethics & Compliance department for guidance or with any questions about the use and handling requirements of our customers' and clients' confidential and personal information.

In the United States, under the Defend Trade Secrets Act of 2016, a US employee will not be held criminally or civilly liable under trade secret laws for disclosing a trade secret in confidence to a government official or an attorney for the sole purpose of reporting or investigating a violation of law. Employees may disclose trade secrets in a complaint or other document filed in a lawsuit (or other proceeding), if the filing is made under seal. An employee alleging retaliation for reporting a suspected violation of the law may disclose a trade secret to his or her attorney and use the trade secret in court proceedings, if the document containing the trade secret is filed under seal and the employee does not otherwise disclose the trade secret, except under court order.



### KEY TERM

#### PERSONAL INFORMATION

*"Personal information" is a broad term for any information that uniquely identifies an individual. Examples of personal information include an individual's name, birthdate, email address, telephone number, home address, government-issued identification number, payment card numbers, financial account information or even a persistent identifier (e.g., customer number) held in a cookie or a processor serial number. Certain demographic information, including gender, education or political affiliation, when combined with personal information, also becomes personal information. Laws governing the definition and treatment of personal information vary by jurisdiction.*

*For questions about how to handle personal information, refer to the [Anywhere Information Management Policy](#) and [Information Security Policy](#) for a full explanation of personal information, examples and handling requirements.*

# Protecting Confidential Information

In addition to employee and client information, your job may also give you access to other **confidential information** that belongs to Anywhere. This information must be safeguarded, and you may not share it with anyone, including your family members, unless authorized by Anywhere. Our confidential information belongs to the company and cannot be used for your own benefit or the benefit of any party other than Anywhere, either during or after your employment. If you leave the company, you must return all materials (and destroy all copies) containing confidential information to Anywhere. Refer to the [Anywhere Information Management Policy](#), which further defines confidential information.

Additionally, you may not share or use confidential information from your prior employers for our benefit.

None of our policies or practices, including the confidentiality obligations discussed above, are intended to or will limit, prevent, impede or interfere with an employee's right, without prior notice to Anywhere, to provide information to the government, participate in investigations, testify in proceedings regarding our past or future conduct, or engage in any activities protected under applicable country whistleblower statutes.



## Are we required to maintain all personal information as "confidential"?

Personal information is a broad term for information related to a person. We may be required to use and disclose (even advertise) personal information, such as contact information, for our clients and customers for legitimate business reasons. But we must always be mindful when using personal information that laws around the world may impose restrictions on our collection, use and disclosure of personal information. You should consult the [Information Management Policy](#) for more detail on your use of personal information in performing your job. In the U.S., certain categories of personal information are treated with heightened sensitivity to protect the privacy and identity of our customers and employees. Examples include an individual's name, plus any of the following data elements: (1) Social Security number; (2) payment card information; and (3) medical or health information, to name a few. We maintain the confidentiality of this information for all customers, clients, and employees.



## KEY TERM

### CONFIDENTIAL INFORMATION

*Information that is restricted from the public. Confidential information includes materials that you may regularly encounter in your work, such as vendor pricing information, sales data, franchisee or client lists, client financial information, unannounced products or services, or unreleased marketing materials. It also includes more sensitive information, which requires greater protections, like non-public financial information, company secrets and significant projects such as proposed acquisitions or the sale of company assets or divisions.*

## Diligence in Information Security

Our company's confidential information must be kept secure, whether in paper or electronic format. As an employee, you are a caretaker of confidential information and you should take steps to reasonably ensure that all confidential information is handled securely, including hardcopy records. This includes all devices and software used for Anywhere business or to store confidential information, such as computers, cell phones and smart phones (often called **Anywhere Information Technology Resources**). We are all responsible for keeping passwords secure, not sharing them with others and immediately reporting any unauthorized access or loss of information to the Ethics & Compliance and Information Security departments. We do not permit any person to attempt to destroy, circumvent, compromise or undermine Anywhere systems, security measures or audit measures. You may not access, modify, remove or destroy files, data or systems without the authority to do so.

The Anywhere Information Security Policy identifies how employees must maintain information. Our Remote Work Environment Technology Policy provides additional guidance regarding how information must be maintained within your workspace.

## Sound Information Management

We are each responsible for the information that we create, possess, collect, use, transmit and manage on behalf of Anywhere. This responsibility requires each of us to use common sense and professionalism in the content we create. To that end, you should retain all information under your control, whether in paper or electronic format, consistent with the Anywhere Information Management Policy. You may not destroy any information that is potentially relevant to any pending, threatened or foreseeable litigation or investigation (whether internal or external) related to a violation of law, the Code of Ethics or company policy.



### KEY TERM

#### **ANYWHERE INFORMATION TECHNOLOGY RESOURCES**

*Refers to, but is not limited to, networks and servers, desktop PCs, laptops, personal digital assistants (PDAs), mobile phones, smart phones, tablets, printing devices, telephones, facsimile machines, voice mail and any other electronic device capable of storing or transmitting information, including email, instant messaging and Internet access provided by Anywhere. The software installed on such devices and resources is also included. The term also refers to non-Anywhere host or server computers, stand-alone computers, laptops and any other communication devices, software, data files and networks when used to perform Anywhere business.*

## AS AN EMPLOYEE...

### I WILL:

Only share our confidential information with those who have a legitimate business reason to know and are authorized to receive it.

Avoid discussing confidential information in public or unsecure areas where it may be overheard.

Safely store and dispose of confidential information according to the [Information Management Policy](#).

### I WILL NOT:

Use our confidential information in my employment with another company.

Share confidential information from my former employers with Anywhere.

Solicit confidential information about another company from employees, clients, customers or vendors.

## REMEMBER



Information is one of our most valued assets. We must create, maintain and use our company's confidential information responsibly. We have a duty to safeguard all confidential information so that it does not fall into the wrong hands.



**My co-worker is primarily responsible for managing a client database. He is going on vacation and I will be covering his work while he is away. Since his vacation is for a limited time, can he share his password with me to access the database while he is away?**

*No. Your manager or department should have procedures in place to address work coverage for any employee who is out of the office, which may include designating delegate access to certain systems during an employee's time out of the office. Sharing passwords with another employee, while well-intentioned, is never the right way to ensure that business continues as usual during an employee's absence. Each employee who is intended to gain access to a secure system must be granted access with their individual credentials to provide only the appropriate level of access and limited for the necessary duration. We encourage you to report any password-sharing violations to the Ethics & Compliance department.*



# INTEGRITY IN OUR MARKETPLACE

Defining our commitment to competing fairly, honestly and lawfully in the marketplace.

## Fair Competition and Antitrust

Our reputation for integrity gives us a competitive edge. We compete vigorously and fairly, and attract clients, independent sales associates and customers who believe in our ethical principles. As an Anywhere employee, you may not seek or use confidential information about our competitors and cannot enter into any formal or informal agreements or discussions with competitors that could be interpreted as collusion or other anti-competitive behavior. If you have questions about whether a course of action may violate global competition laws, be sure to consult the [Antitrust Compliance Policy](#) and contact the Ethics & Compliance department for guidance before proceeding.

## Fair Dealing

We win in the marketplace by acting with integrity, candor and honesty and engaging in truthful and accurate sales and marketing processes. It is never the right decision to take unfair advantage of our clients, vendors or competitors through manipulation, abuse of confidential information, misrepresentation of material facts or any other unfair or deceptive practice. In all of your work for Anywhere, remember our ethical principles and act accordingly.

## Avoidance of Unlawful Transactions

We conduct business only with reputable clients involved in legitimate business activities. Laws in all countries provide guidelines on identifying unlawful or prohibited transactions for our business. We do not accept payments that may be generated by illicit financing or that may represent attempts to launder money obtained through criminal activity. Anywhere does not conduct business with individuals, entities, or companies, or within countries, prohibited by applicable trade compliance laws. For more information on how to avoid unlawful transactions, including your Business Unit's procedures, consult the Anywhere [Global Trade Compliance Policy](#). If you have concerns about a particular transaction or business relationship, you should discuss them with your Business Unit's Legal department, or the Ethics & Compliance department.

### WATCH OUT FOR:

- Formal or informal conversations with competitors about sensitive business information.
- Use of non-public information about competitors received from new hires or interviewees.
- Conversations with competitors that could be perceived as limiting competition. If such a conversation begins, leave the meeting immediately and report it to the Ethics & Compliance department.



**One of my real estate clients shared sensitive pricing information that he had received in confidence from a competitor. Can I use this information?**

*No, you cannot use this information. Contact the Ethics & Compliance department without delay and before any further action is taken.*

# Avoidance of Improper Payments and Corruption

We win business with honesty and transparency and do not engage in any form of **bribery and/or corruption** anywhere in the world. The Anywhere [Anti-Bribery Policy](#) prohibits the offer or acceptance of a bribe and includes a prohibition against **facilitating payments**. We comply fully with the Foreign Corrupt Practices Act, the UK Bribery Act and all other applicable global anti-bribery laws. If you have questions about our anti-bribery policy or the law, or want to report a violation, contact the Ethics & Compliance department or the Code of Ethics Line at: [theline.anywhere.re](mailto:theline.anywhere.re) or 1-866-495-CODE (2633).

## Engaging With The Government:

As a government contractor, Anywhere strictly observes the laws, rules, and regulations that govern the procurement of goods and services and the performance of government contracts by governmental entities. Activities that may be appropriate when dealing with non-government customers may be improper and even illegal when dealing with government. The penalties for failing to follow government procurement laws can be substantial. Anywhere employees who deal with any government agency, including international organizations, are responsible for learning and complying with all rules that apply to government contracting and interactions with government officials.



## Bribery can take many forms and is not limited to cash



### KEY TERMS

#### BRIBERY AND CORRUPTION

*The offer, solicitation or acceptance of any improper payments, gratuities, gifts or favors to obtain or retain business.*

#### FACILITATING PAYMENT

*Small payments made to foreign government officials to expedite routine government services. Sometimes called "grease payments," this practice is very narrowly allowed under the Foreign Corrupt Practices Act, but violates the UK Bribery Act and most other countries' anti-bribery laws. Facilitating payments are prohibited by Anywhere as a company policy.*

## Holding Our Vendors to Our Ethical Standards

We believe in operating with the highest ethical standards and expect the same from our customers, clients, and vendors around the world. In that spirit, we require all Anywhere vendors to abide by the principles set forth in our [Vendor Code of Ethics](#) and expect our colleagues not to take part in or facilitate modern slavery and to report suspicions through the relevant channels. We also take very seriously our responsibility to protect human rights globally and ensure that our business practices do not foster or support slavery or human trafficking in any way. As evidence of this commitment, our [Slavery and Human Trafficking Statement](#) sets forth our commitment to ensuring that slavery and human trafficking do not exist in any part of our business or in our supply chain. This commitment is supported at the highest levels of the company and renewed annually by the Anywhere Board of Directors.

### REMEMBER

Trade-related laws are highly complex, and the right thing to do may not be clear. Before taking action, ask yourself whether that action upholds our standards of integrity and ethics. Remember that the Ethics & Compliance department and the Code of Ethics Line are always available to provide guidance when you need it.



During a recent relocation of a customer's employee, the employee's furniture was held at the country's local port. A local government official advised that it could take up to one month to get the approvals to release the goods, but that she might be able to get that time reduced to a few days if we could talk to our company about getting her daughter a job in our customer service department. Since she's not asking for money, it is not really a bribe, right?

*WRONG. The request or offer of anything of value or any type of advantage in exchange to move forward is considered a bribe. Often a bribe will appear very innocent and can take many forms including: property, gifts, stock, lavish entertainment, meals, events, job offers, vacations, scholarships, charitable contributions, political contributions, discount or an opportunity, as well as a tangible item of value.*

*Offering a bribe to a government agent or entity would still violate country anti-bribery laws.*

*The word "bribe" itself is rarely used in a bribery situation. So be aware of situations where someone offers or requests a favor in exchange for an advantage.*



## COMPLIANCE ISSUES AT A GLANCE

What is the Issue?	What Does it Mean?	What Is an Example?	What Should I Do?
Fair Competition and Antitrust	Avoiding conduct that could hurt consumers by limiting competition in the marketplace.	An acquaintance who works for a competitor suggests that you each take a different territory so as not to compete directly with each other.	Leave the discussion immediately, making it clear that you will not participate. We encourage you to contact the Ethics & Compliance department or report the issue to the <a href="#">Code of Ethics Line</a> .
Fair Dealing	Engaging in sales and marketing practices that are truthful, accurate and ethical.	At a social event, a client of your direct competitor complains about your competitor and offers to forward confidential pricing terms of their current contract for you to match.	While you may discuss the client's complaints, do not accept or use any confidential information to gain an unfair sales or marketing advantage over your competitor. We encourage you to contact the Ethics & Compliance department or report the incident to the <a href="#">Code of Ethics Line</a> .
Money Laundering	Trying to hide the existence, nature or source of illegally obtained funds to make the money appear legitimate.	A client wishes to make payment for a transaction in cash.	This may be an attempt by the client to illegally launder money. Obtain approval from the Ethics & Compliance department before moving forward with the transaction.
Prohibited Transactions	Avoiding transactions that may involve individuals, entities, companies or countries prohibited by international trade compliance laws.	My business unit wants to start conducting business in a country for the first time.	You should consult the <a href="#">Global Trade Compliance Policy</a> to ensure we are not restricted from doing business in this country. We encourage you to contact the Ethics & Compliance department with any concerns or questions you may have.
Bribery and Corruption	The giving or receiving of something of value with the intent of influencing a business decision or official government action.	While negotiating a contract, the prospective client hints that the deal would be signed if you take him on an all-expense paid golf outing.	Do not provide the outing. We encourage you to contact the Ethics & Compliance department or report the incident to the <a href="#">Code of Ethics Line</a> .

# CONFLICTS OF INTEREST, GIFTS & ENTERTAINMENT

Identifying types of conflicts of interest and appropriate gifts and entertainment.



## CONFLICTS OF INTEREST, GIFTS & ENTERTAINMENT



# Addressing Conflicts of Interest

As employees of Anywhere, we all need to provide undivided business loyalty to the company and make our business decisions based on sound business judgment about what is in our best interest. Fundamental to these goals is avoiding conflicts of interest in performing our jobs. A conflict of interest can arise when an employee has personal, family or professional interests that may interfere with duties to Anywhere or make it difficult to perform Anywhere work objectively or effectively. Conflicts range from giving or receiving gifts to taking part-time jobs or outside board positions to maintaining personal relationships with vendors, clients, other employees and independent contractors. For the integrity and credibility of our company, we must avoid actual, potential and perceived conflicts of interest in our work. Even the appearance of such a conflict can damage your reputation or the reputation of the company.

Keep in mind that, as individuals, we are not the best judges of whether an arrangement or relationship is likely to interfere with our work or otherwise creates a conflict of interest. If you become aware of an actual or potential conflict of interest, you have an obligation to disclose it to your manager and to the Code of Ethics Line. While we cannot always avoid conflicts of interest, disclosure protects both you and the company.

Disclose your actual or potential conflict to your manager and to the **Code of Ethics Line** by clicking "MAKE A DISCLOSURE" on the site.



### What are the conflicts of interest I need to report?

We cannot anticipate or address every type of conflict you may face at work. One guiding principle in identifying a conflict of interest is this: Any relationship or arrangement that may tempt you to put your interests (or the interests of a family member or friend) above or in competition with the company's interests presents a possible conflict.

The most common types of conflicts of interest fall under the following categories:

- Personal relationships (relationships with another employee, family member, client or vendor)
- Personal investments and business opportunities (involving employees, Anywhere opportunities or Anywhere competitors)
- Positions outside of work (a second job or board position)
- Gifts and Entertainment (giving or receiving gifts or other benefits related to your job)

Additional Information regarding Conflicts of Interest is provided in the [Conflict of Interest Disclosure Category List](#)



### How do I report a conflict of interest?

There are two types of conflicts of interest that should be reported - your own personal conflicts of interest and other conflict situations that you observe.

You must disclose your own personal conflicts in the Disclosure Dashboard accessible on [theline.anywhere.re](https://theline.anywhere.re) by clicking "MAKE A DISCLOSURE" so that it can be properly managed.

In addition, you should report to the Code of Ethics Line actual or potential conflicts by others that you witness and that have not been reported - for instance, situations where your manager fails to disclose that he or she has hired a relative for a consulting role.



## Personal Relationships

In making decisions about employment matters or transactions with vendors or clients, we need to ensure the best outcomes for the company by avoiding situations that may inappropriately affect our judgment. Personal relationships—whether family, friend or romantic—can complicate business decisions. Even when you believe you are exercising objective business judgment, the existence of a personal relationship may influence, or appear to influence, your decisions and create a conflict of interest. For that reason, with very limited exceptions, our company policy prohibits family members and romantic partners to be employed in the same reporting line at Anywhere.

Similarly, we do not permit our employees to select, recommend or retain vendors or to set terms of transactions with clients with whom they have a personal relationship, unless the relationship has been disclosed and any conflict can be effectively minimized.



### When to Report a Personal Relationship

You must disclose a personal relationship conflict to your manager and to the Disclosure Dashboard found on [theline.anywhere.re](https://theline.anywhere.re) if you, your relative, friend, romantic partner, or member of your household:

- Works for Anywhere or is applying for work at Anywhere
- Owns or works for an existing vendor, a vendor under consideration, a Anywhere competitor, or any third party with a relationship with Anywhere (e.g., clients, franchisees or charitable organizations)
- Is affiliated with our brokerage group as an independent sales associate or leases office space to any Anywhere company or joint venture
- Is otherwise in a position to benefit from a connection to Anywhere

Personal relationship conflicts must be disclosed at the time they arise and updated, as needed, to reflect any changes in the relationship.

## Personal Investments and Business Opportunities

Through your position at Anywhere, you may be presented with ideas and opportunities related to our existing or potential business from employees, clients, vendors, independent contractors or other third parties. You have a duty to advance the company's interests when opportunities arise. You may not pursue these opportunities, or provide them to others, through investment or otherwise, without prior approval from the Ethics & Compliance department.

In addition, to avoid other conflicts of interest, we restrict certain financial arrangements involving employees and competitors. Employees in the same reporting line must avoid making joint financial investments or other financial arrangements between them, including loans, outside of work. We also do not permit material investments in our competitors or investments that require a significant time commitment from a full-time employee without prior approval from the Ethics & Compliance department.



### When to Report a Personal Investment

You must disclose a personal investment to your manager and to the Disclosure Dashboard accessible on [theline.anywhere.re](https://theline.anywhere.re) if it involves:

- Your work at Anywhere or a confidential idea that Anywhere previously considered or pursued
- An investment with or a significant loan to another Anywhere employee
- A material investment in any Anywhere competitor or real estate industry vendor
- An investment in a business venture that requires your active participation or a significant time commitment that may interfere with your ability to perform your duties
- An investment opportunity that you would like to pursue and that you became aware of as a result of your employment with Anywhere

These personal investments must be disclosed prior to making any financial commitment and updated, as needed, to reflect any changes in the financial investment.



## Positions Outside of Work

Your work for Anywhere should remain a primary concern throughout your tenure with the company. Outside activities—such as jobs with another company, board positions or government positions—should be carefully examined to ensure that they do not interfere with your job at Anywhere as a result of a substantial time commitment or divided professional loyalties. Participation in any outside activities or organizations, particularly those that may relate to your role at Anywhere, should be disclosed to your manager and to the Disclosure Dashboard accessible on [theline.anywhere.re](https://theline.anywhere.re) for prior approval if they meet any of the referenced criteria.

## Appropriate Gifts and Entertainment

Within reasonable limits and under the right circumstances, gifts and entertainment are a normal part of business. For example, dinner with a customer or vendor or a token gift of appreciation is usually an acceptable business exchange and can be an effective way to build goodwill in a business relationship. We must exercise care though. Gifts and entertainment can vary widely in value and their purpose can be subject to interpretation. The value and circumstances surrounding a gift or entertainment event will determine whether it complies with our policies. As a threshold matter, Anywhere employees may never *request* a gift, entertainment, or even special treatment (such as upgrades or discounts) from any vendor, potential vendor or customer. In addition, we must be very careful that we never exploit (or even appear to exploit) our corporate positions/titles or the company's buying power for our own personal benefit.

Generally speaking, our company permits the giving and receiving of gifts and entertainment of value provided they: (a) could not be perceived as a bribe or an attempt to influence a business decision; (b) are not intended to, and do not, create a sense of obligation for any party involved; and (c) do not involve any of the following:

- Gifts with a value exceeding US \$200
- Gifts of cash or its equivalent
- Gifts to or from a government official, agent or politician, or their family member or representative
- Gifts to or from a party in active or recently concluded negotiations with Anywhere
- A violation of law or industry regulation

If you have been offered or intend to offer a gift or entertainment opportunity that does not meet all of the criteria outlined in this section for a permissible gift, you must report the gift through the Code of Ethics Line and receive approval before proceeding. Special rules on gifts and entertainment apply when conducting business with government officials or government-owned entities. This area of the law can be complex. Contact the Ethics & Compliance department for guidance in such situations. For more information about gifts and entertainment, consult the Anywhere [Gift Policy](#).



### When to Report a Position Outside of Work

Any paid or unpaid, full or part-time, position outside of your work at Anywhere must be disclosed to your manager and to the Ethics & Compliance department through the Disclosure Dashboard accessible on [theline.anywhere.re](https://theline.anywhere.re) for approval if it involves:

- A job with another company or self-employment
- A government position
- A board position with any for-profit organization
- A role with any organization in the real estate industry

You are not required to report volunteer work you perform for charitable or political organizations provided the position does not fall into one of the categories above.

Outside positions that require reporting to the Code of Ethics Line should be disclosed before you accept the position and updated, as needed, to reflect changed circumstances. We may deny a request if the position may affect your ability to perform your job or presents a competitive conflict of interest within the real estate industry.

It is important that we conduct our professional relationships with the highest degree of integrity and avoid any perception of influence over our business decisions by strictly adhering to our company policy on giving and receiving gifts.

A black and white photograph of a woman with long dark hair, wearing a light-colored sweater, sitting at a desk and working on a computer. She is looking at a large monitor displaying a website. A smaller monitor to her left shows a video call with three participants. A desk lamp is visible on the left side of the desk. The image has a semi-transparent purple overlay on the left side.

# OUR INTERESTS, PROPERTY & RESOURCES

Protecting our interests, both  
physical and intangible assets.

## Respecting Company Resources

Our company provides us with many resources, including supplies and information technology resources, to help us perform our work and achieve our business objectives. These resources are provided to advance the business interests of Anywhere. We are all stewards of these resources and must use them responsibly in a professional, ethical and lawful manner. You may not waste, abuse or destroy our resources for any reason or use them for purposes other than for the benefit of our company. Proper care, discretion and restraint should always govern the use of our assets, including incidental personal use. In addition, all employees are responsible for protecting our resources from fraud, theft and misappropriation.

## Use of Information Technology Resources and Assets

Anywhere may provide you with information technology resources to help you perform your job. While incidental personal use is permitted on a limited basis, you may not use, or permit any third party to use, Anywhere-owned software, networks, electronic systems or equipment for non-Anywhere commercial purposes. Anywhere management reserves the right, where permitted by law, to monitor and review its information technology resources. Unless expressly granted by local law, you should not expect personal privacy when using such resources or with respect to data stored on them. To protect our company systems, we do not allow employees to install any software programs, devices or applications on our information technology resources unless authorized by the Information Technology department.

The Anywhere [Anti-Fraud Policy & Response Plan](#), [Information Technology Acceptable Use Policy](#), [Information Security Policy](#) and [Information Security Standards](#) provide detailed information and guidance on proper business use and prohibitions regarding our information technology resources.



**In my off-hours, I manage a small business that does website development for other small businesses and charitable organizations. May I use a company-issued laptop, phone, or email during my lunch break to troubleshoot issues or to schedule work and appointments for evenings and weekends?**

*No. Company assets, such as company laptops, phones, fax machines or email, may never be used for personal gain or profit, regardless of when the employee wishes to use the assets. Network access is also considered a company asset and is intended for use by employees for legitimate business purposes and never for personal gain or profit.*

# Proper Use of Social Media

At Anywhere, we understand the value of social media as an important channel of communication to connect with each other, market our products and enhance our brands. While social media creates new opportunities for personal expression, it also creates risks and responsibilities. As an Anywhere employee, you are viewed by our customers, partners, and other outside parties as a representative of Anywhere. Whether or not you specifically reference or discuss your work, your participation on social media platforms is a reflection of the company.

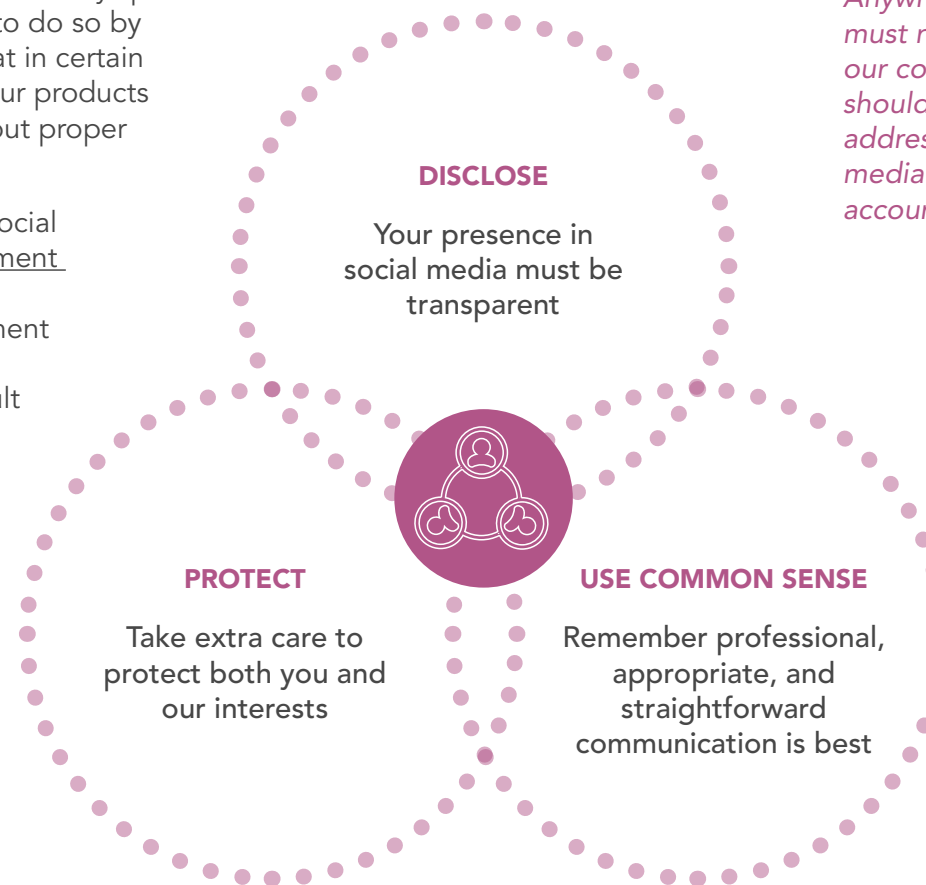
You should be familiar with and follow the Anywhere [Social Media Policy](#). While you have legal rights to use social media, you may never officially speak for or represent Anywhere or its subsidiaries unless authorized to do so by our Communications department. You should also be aware that in certain jurisdictions, even seemingly innocent acts such as endorsing our products or services may violate fair-advertising regulations if done without proper disclosure of your relationship with the company.

You may not use our information technology resources to use social media in a way that would violate the law or our [Equal Employment Opportunity Policy](#), [Prohibited Harassment Policy](#), [Non-Violent Workplace Policy](#) all of which can be found in our Key Employment Policies. In addition, you should never disclose our or our subsidiaries' confidential information using social media. Consult the [Social Media Policy](#) for further guidance.



**I have a social media account that shows my employment at Anywhere on my profile. Am I allowed to post work-related messages?**

*You are required to identify yourself as an Anywhere employee in matters that relate to our services, products and offerings. Similarly, you may not endorse our products and services without disclosing your position at Anywhere. In addition, your posts must not violate the law or disclose our confidential information. You should not use your company email address to register a personal social media account or any other personal account.*





# Ownership and Protection of Intellectual Property

Our success is based in part on our development and protection of world-renowned real estate brands and other **intellectual property**. As an Anywhere employee, you must safeguard our intellectual property, as well as the intellectual property of our clients, vendors, independent contractors and other third parties. Intellectual property can include our brand logos, trademarks, written materials, domain names, patents and other intangible assets. You may not use our logo or our brands' logos or letterhead or any other company trademarks, copyrighted materials or other intellectual property for your personal use.

To the extent allowed under applicable law, Anywhere will be considered at the time of development, or will become through transfer, the owner of all rights in any intellectual property asset that you develop or acquire in the course of performing work or services for Anywhere or any of its subsidiaries.

At Anywhere, we also respect the intellectual property of others, including our clients, vendors, independent contractors and other third parties. You should not reproduce, display, destroy or alter copyrighted materials, including photos, without permission of the copyright owner, or use or copy trademarks or logos without the permission of the brand owner. In addition, you should always use software, including open-source software, according to its license terms.

## REMEMBER

We all work hard to establish Anywhere as a leader in the real estate industry. Our company's strength relies on our ability to optimize and safeguard its assets—both physical and intellectual.



### KEY TERM

#### INTELLECTUAL PROPERTY

*Intangible asset created for, or licensed to, our company by employees, vendors, independent contractors or other third parties. Examples are patents, trademarks, copyrights, trade secrets, software, business methods, designs, technical data, business know-how, company manuals and other inventions.*



#### What are some examples of intellectual property I may encounter working for Anywhere?

*The best examples are our brand names and logos, such as Better Homes and Gardens Real Estate, CENTURY 21, Coldwell Banker, Coldwell Banker Commercial, ERA, Sotheby's International Realty, our brokerage group, Corcoran, Cartus and our Title Group. Other examples include domain names, software source code and photographs.*

# INVESTMENTS & EXTERNAL ACTIVITIES

Proper handling of insider information, political activities and external requests for company information.



## Handling Insider Information

Our jobs sometimes give us access to non-public information about Anywhere or other companies. You cannot trade in the stock of Anywhere or any other company on the basis of **material non-public information**. Further, these trading restrictions extend to your spouse, minor children, adult family members living in your household, and any other person or entity or trust over which you exercise substantial influence or control over their or its securities trading decisions. Not only are such activities against company policy, they are also illegal. When in doubt, consult with the Anywhere [Insider Trading Policy](#) or the Legal department.

Additionally, we must not share material non-public information with anyone, including family members, or advise others to trade stock on the basis of this information. Do not disclose material non-public information to any outside person, or through social media, or speak to media, investment professionals, market analysts or shareholders about company business unless explicitly permitted under the Anywhere [Investor Communications Policy](#).

## Handling Public Relations and Investor Relations

If you receive a request from the media, such as questions from a reporter seeking comment from the company, or a request for an interview with company representatives or photos, refrain from responding to the inquiry and immediately refer it to our Communications department. We must take care not to disclose any confidential information through public or casual conversations with the media or other third parties.

You may not speak to investment professionals, market analysts and shareholders about Anywhere, its performance or any related matters, including the housing market or other companies in the industry, unless you are explicitly authorized to do so. You should refer any inquiries from investment professionals, market analysts or shareholders of Anywhere to the Investor Relations department if you are not authorized to speak with them.



### KEY TERM

#### MATERIAL NON-PUBLIC INFORMATION

*Information that a reasonable investor would consider important in making a decision to buy or sell securities, but that has not been publicly disclosed. Examples include unannounced financial results, merger or acquisition information, changes in senior leadership, new products and developments in pending litigation.*



**A draft press release was inadvertently emailed to me, disclosing that we are purchasing another company that is publicly traded. Can I buy stock in the other company before the news is announced?**

*No. That information would likely be considered material non-public information. Trading stock in either Anywhere or the other company with that information would be against company policy and could be illegal. Contact the Ethics & Compliance department for guidance and refrain from buying stock in the other company.*

## Engaging in Political Activity

Anywhere is supportive of its employees engaging in their communities and participating in the political process. However, in doing so, you should separate your personal political activities from those of Anywhere. Supporting these personal political activities cannot be conducted on company time, with any company resources or as a representative of Anywhere (including online and/or on social media platforms where you indicate your employment or affiliation with the company). You may not make political contributions or conduct lobbying activities on behalf of Anywhere, unless you are expressly authorized to do so and have cleared the contribution through the Legal department.

## Responding to Legal or Regulatory Inquiries

We must immediately consult with the Legal department if, as a representative of Anywhere, we receive any claim, demand, summons, subpoena, inquiry or other similar communication. We also must fully and truthfully cooperate and/or assist with our response to legal and regulatory inquiries whenever we are instructed to do so.

### REMEMBER

Strict rules and laws govern how we use and communicate financial and other material non-public information. Our Communications and Legal departments are designed to handle such responsibilities, and the Ethics & Compliance department is always available to provide guidance when you are unsure about a course of action.



## AS AN EMPLOYEE...

### I WILL:

Keep confidential any material non-public information that I come across in my work.

Refer media requests for company information to the Communications department.

Use only personal time and resources to pursue community and political activities advancing my personal interests.

### I WILL NOT:

Trade Anywhere or another company's stock based on knowledge of material non-public information.

Speak (or post on social media) on behalf of the company unless given the authority to do so by the Communications department.

Claim to represent the company or use company time or assets while advancing my personal political interests.

# GOOD CORPORATE CITIZENSHIP

Respecting the environment  
in which we live and work,  
truthfulness in our company  
records, addressing any concerns.



# Addressing Suspected Violations

We have a collective responsibility to maintain our reputation and integrity. We encourage you to report all suspected violations of the Code of Ethics. Anywhere is obligated to properly investigate and resolve all such reports. Anywhere does not tolerate retaliation against anyone who makes a good-faith inquiry or report a suspected violation. If you become aware of another employee reporting an allegation, we ask that you respect the confidentiality of the related investigation.

While we request confidentiality for our investigations, nothing in our Code of Ethics or any Anywhere policy or agreement prohibits you from reporting possible violations of federal, state or local law or regulation to any governmental agency or entity, including the Department of Justice, the Securities and Exchange Commission, Congress and any agency Inspector General, or making other disclosures that are protected under the whistleblower provisions of federal, state or local law or regulation. You do not need the prior authorization or approval from Anywhere to make these reports or disclosures and you are not required to notify Anywhere that you have made these reports or disclosures.

# Accurate Books and Records and Financial Disclosures

Honest and accurate recording and reporting of financial information to our stakeholders is critical to our business. We have a duty to ensure the accuracy of our financial information. Our financial statements conform to generally accepted accounting principles and must accurately reflect financial transactions and events. You must not falsify any record or document for any reason or establish any undisclosed or unrecorded funds or assets for any purpose. You have a responsibility to comply with the Anywhere system of internal controls and may not attempt to circumvent any such process or control. We encourage you to report any suspected **fraud** in the company's financial reporting, disclosures or internal controls to the Code of Ethics Line in accordance with the Anywhere [Anti-Fraud Policy & Response Plan](#).

Watch out for fraudulent activity. If something doesn't seem right, raise the concern with your manager, Human Resources Business Partner, the Ethics & Compliance department, or contact the Code of Ethics Line at [theline.anywhere.re](http://theline.anywhere.re) or 1-866-495-CODE (2633).



## KEY TERM

### FRAUD

*A deliberate false representation of company information or records. Examples include the false reporting of expenses or revenue, misappropriation of assets, improper time reporting, embezzlement of company funds, falsification or tampering with company records and falsifying personal credentials.*



**In reviewing closing documents, you notice that the buyer inadvertently failed to sign one of the documents. To expedite the closing, your manager tells you to sign on behalf of the buyer. The alteration would save time and keep the closing on track. Could this be fraud?**

*Yes, even if the actions seem to benefit the customer. Fraud can take many forms and typically involves attempts to bypass controls or procedures in addition to manipulating documents and records. All employees have a responsibility to work within the internal controls and framework of the company, and to prevent others from attempting to circumvent those controls.*

## Protecting Our Environment

We are committed to growing and advancing our business with a focus on sustainable business practices. We strive to meet or exceed all health, safety and environmental requirements applicable to our operations and work continuously to minimize the environmental impacts of our operations by taking specific measures to recycle, conserve energy and natural resources, and reduce our carbon footprint.

## Engaging in Our Communities

Our success is built on strong communities. Each year, the company's Charitable Foundation raises and donates funds to many charities. In addition, our employees, franchisees and independent sales associates contribute to their communities through philanthropic practices and by volunteering in charitable, social or political organizations. We are very proud of all the significant work accomplished by Anywhere, its business units and its brands.

As you take part in these important efforts, please keep in mind that your role at Anywhere may put you in a position to influence other employees (particularly those who report to you), your colleagues and the vendors you engage on our behalf. In the spirit of respecting and encouraging diversity of all kinds and to avoid potential conflicts of interest, you should be careful to avoid imposing your beliefs on others or soliciting donations in the workplace for the organizations you support. You should not leverage your position at the company to benefit the charities you personally support.

Anywhere supports our employees' commitment to the causes they are passionate about and encourages all employees to become involved in their communities to make a difference for others.

## Obtaining Exceptions

In rare circumstances, an exception to a particular Code of Ethics requirement may be granted by the Ethics & Compliance department. Exceptions must be requested and granted before the exception can be pursued. Exceptions for Executive Officers must be submitted to the Chief Ethics & Compliance Officer and approved by the Audit Committee of our board of directors. Waivers granted for Executive Officers will be publicly disclosed as required by law or stock exchange listing rules.

### REMEMBER



Being the industry leader requires that we act ethically and responsibly, both in the work that we do for Anywhere and in how we interact with our environment and communities.

# THE CODE OF ETHICS CERTIFICATION & OTHER RESOURCES

## Annual Certification

Every year, we renew our commitment to the Code of Ethics by completing the Code of Ethics training and the annual certification. This annual commitment reminds us of our mandatory ethical responsibilities to Anywhere and to each other and helps to maintain the high standards of integrity that define our culture.





# Ethics & Compliance Contacts

## Code of Ethics Line

[theline.anywhere.re](https://theline.anywhere.re)

1-866-495-CODE (2633)

For country-specific dialing instructions go to [theline.anywhere.re](https://theline.anywhere.re)

## Ethics & Compliance department

[ethics.compliance@anywhere.re](mailto:ethics.compliance@anywhere.re)

## Business Unit Contacts

Click here for the [Network Contacts Roster](#)

## Ethics & Compliance Page (Central)



Policy Name: The Code of Ethics  
Effective Date: September, 2021  
Distribution: All Employees  
Policy Owner: Ethics & Compliance Department  
Version: v2  
Date Updated: June 9, 2022 to reflect Realogy's rebrand to Anywhere Real Estate Inc.

# Addendum - AMENDMENTS TO THE ANYWHERE CODE OF ETHICS

## Amendments to the Anywhere Code of Ethics include:

- “A Message from our Chief Executive Officer and President” and “A Message from our Chief Ethics & Compliance Officer” – Senior leader messaging updated to reinforce the importance of compliance and business integrity (pgs. 4 & 5).
- “Our Values In Action” added to highlight our core values that serve as the foundation of our business (pg. 5).
- “About the Code of Ethics” expanded to highlight manager responsibility to drive a culture of compliance and business integrity (pg. 6).
- “Seeking Guidance and Reporting Concerns” decision-tree updated to guide employees in navigating the right course of action (pg. 7).
- “Our Code of Ethics Line” enhanced to provide increased transparency around the reporting and investigatory process (pg. 9).
- “Freedom from Discrimination, Harassment and/or Retaliation” enhanced to provide further focus and guidance on appropriate behaviors (pg. 12).
- “Safe Workplace” enhanced to provide further detail on maintaining a safe and secure workplace (pg. 13).
- “We Embrace Diversity, Equity & Inclusion” enhanced to highlight the company’s commitment to creating a diverse and inclusive work environment (pg. 14).
- “Fair Competition and Antitrust” expanded to provide examples and further guidance on identifying anti-competitive behavior (pg. 22).
- “Engaging With The Government” section added to provide guidance regarding interactions with government entities and complying with government procurement requirements (pg. 23).
- “Addressing Conflicts of Interest” providing further detail on reporting conflict situations (pg. 27) and adding self-employment to reporting obligations (pg. 29).
- “Holding our Vendors to Our Ethical Standards” added to define the high ethical standards expected from our vendors (pg. 24).
- “Proper Use of Social Media” expanded to clarify employee obligations regarding appropriate use of social media (pg. 32).
- “Handling Insider Information” expanded to cover persons or entities beyond Anywhere employees, including family members and others, providing substantial influence or control over securities trading decisions (pg. 35).
- “Handling Public Relations and Investor Relations” expanded to clarify requirement for employees to refrain from responding to media inquiries and to refer such inquiries to our Communications department (pg. 35).
- “Engaging in Political Activity” expanded to clarify that Anywhere policies apply to platforms where employment or affiliation with the company are indicated (pg. 36).
- “Accurate Books and Records and Financial Disclosures” revised to include a new Q&A related to accurate recordkeeping (pg. 38).