

Adevinta

# Our Code of Ethical Conduct





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# Message from our CEO

Since we began our journey as a standalone company in 2019 to become the world's leading online classifieds group, we have each played a part in creating a diverse and inclusive Adevinta. Regardless of the differences between us, our origins, our jobs or our areas of expertise, we all share responsibility for Adevinta's success and for contributing to sustainable growth through our actions.


The purpose of Adevinta's Code of Ethical Conduct is to establish expectations around how we conduct ourselves, encompassing our Key Behaviours and sustainability agenda.

This Code sits at the core of our culture. It inspires the actions we take and the decisions we make, helping us to do so with integrity, security, and in line with relevant laws and regulations.

It's up to all of us, every day, to make and keep Adevinta the kind of company we can all be proud of. The Code contains practical examples to offer guidance and help us identify inappropriate behaviours.

At Adevinta we Use Our Voice, and turning a blind eye to unethical conduct is never the right solution. In case you do not feel comfortable with a decision or business transaction or a behaviour you observe, you should speak up and ask for advice, knowing that you can count on my support and that of the entire Adevinta Executive Team. At Adevinta we all Win and Lose together.

Let us join together to make Adevinta a company known not only for helping everything and everyone to find a new purpose, but also because we do this with integrity, fairness and with the highest possible standards of ethical business conduct, building the most trusted and secure marketplaces.



**Antoine Jouteau**  
CEO Adevinta





**Adevinta's purpose is to make a positive change in the world by helping everyone and everything find new purpose.**

**We do this through our mission, creating perfect matches on the world's most trusted marketplaces.**

Together with our Key Behaviours, our Code of Ethical Conduct serves as a roadmap for business decisions, guiding the actions of our employees to ensure we are always consistent with our Purpose and Mission as we work towards our vision of sustainable commerce shaping a healthy planet and society.

Adevinta's success depends on earning the trust and confidence of our employees, customers and shareholders. We gain credibility each time we live by our Key Behaviours:



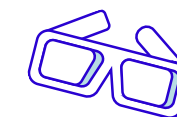
**Experiment bravely**



**Act for max impact**



**Use your voice**



**Grow through different perspectives**



**Win together, lose together**

We look to build trust and confidence from our customers and shareholders by upholding the highest standards of ethical business conduct, displaying honesty and integrity and reaching company goals by acting with integrity and unity.



# (1) About the Code

## 1.1 Why we have a Code

At Adevinta, we believe it's not just what we do that matters, it's also about how we do it. To achieve our mission of creating perfect matches on the world's most trusted market places, we have to work together in ways that comply with our Code of Ethical Conduct ("Code").

Our Code helps all of us to act with integrity and align with laws and regulations. It sets out the basic requirements for business conduct and serves as a foundation for our Company policies, procedures, and guidelines – all of which provide additional guidance on what is expected of all Adevintans.

Our Code is key to achieving our purpose and delivering our business strategy in an honest way, whilst maintaining our integrity.





# (1) About the Code

## Why we have one, how it can help you and who it applies to

### 1.2 How the Code can help you

This Code helps you:

- ✓ Understand what is expected of you
- ✓ Make good decisions every day
- ✓ Behave honestly and ethically, in line with Key Behaviours
- ✓ Comply with laws, regulations and standards that apply to our company
- ✓ Understand where to go if you need help

### 1.3 Who does the Code apply to?

**This Code applies to all those working for, or on behalf of, companies in the Adevinta Group\*.**

This includes the Board of Directors, the AdEx, the Adevinta Leadership Team, all employees (whether permanent or on a fixed term contract), as well as anyone working on behalf of Adevinta.

For joint ventures and minority investments, the director(s) appointed by the Group to the Board of such Company will promote the principles outlined in this Code.

We have a specific [Supplier Code of Conduct](#) which all suppliers must adhere to.

\* The Adevinta Group includes Adevinta ASA and all subsidiary companies which are directly or indirectly controlled by Adevinta, or in which Adevinta directly or indirectly owns more than 50% of the shares.

### 1.4 Your responsibilities

**All employees, regardless of grade or position must:**

- Read, gain and maintain an understanding of this Code
- Participate in provided training sessions
- Understand the different channels for raising unethical business conduct
- Promptly raise concerns about any unethical business conduct
- Comply with the Code

**All People Leaders have additional responsibilities that go beyond complying with the Group's Code. In particular, they have responsibility to:**

- Lead by example
- Create a culture where discussing ethical and compliance issues is integrated into business decisions
- Support their team in understanding why it's important to behave with integrity, acting as a first point of contact if team members have questions on the Code
- Maintain a culture where ethical conduct is recognised, valued and exemplified by all Adevintans
- Make sure that all new joiners are introduced to and understand the Code as part of their on-boarding process



# (1) About the code

## 1.5 Implications of not following this Code

Complying with our Code helps us achieve our goals with integrity.

If we become aware of a breach of this Code, we will act to address the problem and prevent future occurrences. Depending on the circumstances, this might include training or coaching. In more serious situations, it may mean disciplinary action, including termination of employment or contract. There may also be legal consequences to breaching some aspects of this Code, both on a company and individual level.

## 1.6 Observing and complying with laws where we operate

We are committed to working within the laws, regulations and industry codes that apply in our different marketplaces. When these are stricter than our global policies, we work to comply with the strictest requirements. Complying with these regulations means that we do business on equal terms with no unfair advantages.

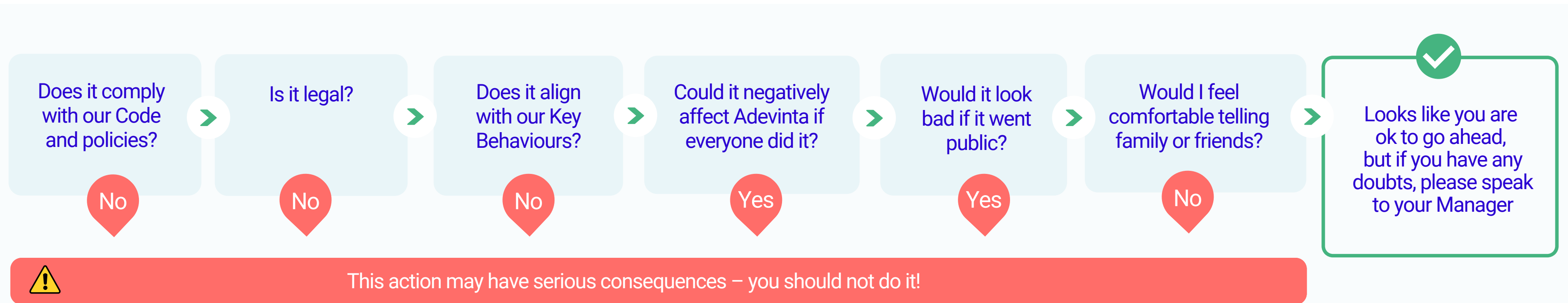
If you are unsure about the impact of different countries' laws on your work, check with your local Legal Counsel or our Group Ethics and Compliance team ([groupethicscompliance@adevinta.com](mailto:groupethicscompliance@adevinta.com)).





## (2) Decision making framework

We all have to make decisions in our day-to-day work.  
When faced with challenging decisions, ask yourself these questions:



### Doubts or questions?

If you are unsure about the answers to any of these questions, you should speak to your line manager, your local Legal Counsel or our Group Ethics and Compliance Team.

Similarly, if you observe a behaviour that you feel uncomfortable about, put yourself in that person's shoes and use the questions above to help you identify unethical conduct. If in doubt, always speak to your line manager, your local Legal Counsel or our Group Ethics and Compliance team.



## (3) Reporting concerns



At Adevinta, we do **not** tolerate retaliation against anyone who raises a concern in good faith, or assists with an investigation.

Examples of retaliation might include demotion, firing, a reduced salary, job reassignment, change in working hours, withholding of training, a negative performance review, harm to a person's reputation (particularly on social media), threats, harassment or any other action taken against someone because they raised a Code concern, or participated in an investigation.

Any employee who engages in retaliation will face disciplinary action, which could include termination of employment.

### 3.1 Reporting concerns related to this Code or our company policies

At Adevinta, we want you to [use your voice](#). We foster an environment of open communication where everyone feels they can speak freely and share relevant information.

So we all have a responsibility to speak up if we have a concern, or think something may be in breach of our Code of Ethical Conduct or any of our company policies.

Sometimes you might be unsure if what has happened is “bad enough” to report, but it is better to raise the issue rather than keep it to yourself. Reporting your concerns will help us to manage issues effectively, prevent problems before they occur, remedy situations that have already happened, and learn from any mistakes.

At Adevinta, we [win and lose together](#). It's about each of us taking ownership and accountability. So reporting your concerns promptly will help us maintain trust with each other, our customers, and other important stakeholders. We know that in these kinds of situations, confidentiality and anonymity are important.

Following a thorough investigation, we will determine appropriate action which may include disciplinary action, up to and including dismissal, in accordance with applicable law. We expect concerns to be raised honestly and in good faith. It is a breach of this Code to raise a false complaint.

### 3.2 How do I share a concern related to the Code?

For Code matters, you can talk to your:

- Line manager or your Line Manager's Manager
- Compass Team (Workday Help) or your local HR contact
- [Group Ethics and Compliance team](#)

For legal compliance matters, you can also refer to your local Legal Counsel.

### 3.3 Our 'Speak Up' service

If you don't feel comfortable raising a concern to any of the teams noted above, you can also report via our Speak Up channel.

Information on local contact numbers and web addresses can be found [here](#). You may choose to remain anonymous. Providing as much information as possible will help us investigate thoroughly.

***See [Speak up and Investigations Procedure](#).***

# Protection

In this section

## (4) Protecting our assets and information

- 4.1 Safeguarding company assets and information
- 4.2 Use of company assets and networks
- 4.3 Data privacy
- 4.4 Protecting non-public information







# Protection

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## What it means

Adevinta is an organisation rich with information, data, and assets (both tangible and non-tangible).

Each of us has a responsibility to protect what we have in order to achieve our mission and thrive in the market.



# Integrity

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## Why it's important

There are legal, reputational, and commercial risks associated with failing to protect our information, data and assets.

We must get this right in order to operate effectively and deliver value to our stakeholders and society.



# Respect

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## What we expect from you

We ask you all to commit to protecting our information, data, and assets in order to comply with regulation, protect our reputation and commercial success. If you need to report an incident relating to the mistreatment or loss of any of the above, please do so immediately.

# (4) Protecting our assets and information



## 4.1 Safeguarding company assets / information

We work hard to enable and empower all Adevinta marketplaces with best-fit cyber security defence and monitoring capabilities, but everyone has a responsibility to use tech resources appropriately and professionally to make sure we stay secure.

We put ourselves and the company at risk if we don't put cyber security at the top of our priority list.

All Adevintans should exercise good judgement regarding appropriate use of information, electronic devices, and network resources in accordance with Adevinta policies and standards, as well as local laws and regulation.

**See [Global Acceptable Use Policy](#)**

## 4.2 Use of company assets and networks

Adevinta strives to give employees the tools they need – both equipment and information – to be able to **act with max impact** and **experiment bravely**.

We ask that you treat these assets with care to avoid loss, theft, or damage so that we can continue to operate effectively. This includes physical assets (such as IT equipment), as well as non-physical assets (such as confidential information and intellectual property rights). This applies when working at any location – whether it is in the office or at home.

When working with Company information or equipment (such as laptops, email, apps, databases, etc.), you should set up complex passwords that cannot be easily guessed and should never share passwords.

**Helpful contacts** [Global Cyber Security Team](#)



## Win together, lose together

It is not just physical equipment or tangible data that we must protect. Our intellectual property – the stuff we have created using our minds – is one of our most valuable assets.

If this becomes available to others (either deliberately or by mistake), we will lose our competitive advantage and compromise our ability to provide unique services to our customers.



Read more about protecting our assets and information, and the information of customers and users on the [Global Cyber Security](#) section on Wave.

### Be careful **not** to share confidential information:

- In a public place like a restaurant or a lift
- When travelling and others are close by
- When forwarding email chains
- On online forums and social media
- When other people might be listening



### Confidential information we should protect

- information on transactions
- business plans
- product development plans
- budgets and results







## (4) Protecting our assets and information (continued)



### 4.3 Data privacy

Upholding data privacy is an integral part of our business and therefore essential to our success. Data privacy is about respecting individuals' rights when we are using their data, be that customers/ end users, employees or contractors.

General Data Protection Regulation (GDPR) and other privacy laws outline a set of challenging requirements when we process personal data and we must ensure that we can demonstrate compliance with the requirements, whilst still achieving business aims. Many of these requirements make good business sense however, and therefore data privacy should be seen as an integrated part of our business, not as a separate compliance exercise.

We expect all Adevintans to comply with these requirements and treat personal data in accordance with our policies. Please go to the Group Policy on Privacy (GPP) for more information.

If you have a concern about the management, storage, or deletion of data, contact the [Privacy team](#).

**See [Adevinta Group Policy on Privacy](#)**

#### What is Personal Data?

Data which can be used to identify an Individual (direct identification) or data which can be used along with other information in our possession, or is likely to be used to identify an Individual (indirect identification). Personal Data is not just limited to information in databases. The definition can include physical documentation, images, video recordings, call recordings, blog posts or opinions, IP addresses and some types of Tracking Technologies.

### 4.4 Protecting non-public information

Some of us may have access to information through our work that is not publicly known, and which could affect Adevinta's share price. Sharing this information beyond those who need to know is prohibited.

To trade in Adevinta shares when in possession of such knowledge is known as insider trading, which is strictly prohibited. It is illegal and a violation of this Code.

If you have questions as to whether the information you possess qualifies as insider information, please consult the Investor Relations Team.

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#### Examples of non-public information include

- Financial information
- The development of new products or services
- A proposed acquisition, joint venture or merger
- Government investigations
- Changes in key personnel





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## What should I do?

"Occasionally my friends ask me about Adevinta and whether it would be smart to buy stock. I tell them what I know about our company and sometimes encourage them to buy stock. Is this ok?"

If a friend buys or sell stock based on non-public information that you have told them, both of you could be liable for breaking the law – this is called “tipping”. You could actually be in violation simply for sharing non-public information, even if they don’t use it for financial gain.

## Use your voice

You have a responsibility to promptly report the theft, loss or unauthorized disclosure of Adevinta assets or information to your manager and the Global Cyber Security team.

You can report a cyber security incident [here](#).



# Integrity

In this section

- 05 Maintaining accurate records and information
- 06 Procurement and suppliers
- 07 Anti-Bribery & Corruption
- 08 Conflicts of interest
- 09 Gifts, hospitality and entertainment
- 10 Fair competition
- 11 Lobbying
- 12 Social media and communications
- 13 Money laundering and financing terrorism
- 14 Sale or promotion of unlawful goods or services







# Protection

## What it means

We believe it's not just what we achieve that matters, it's also about how we achieve it. Acting with integrity across all our business activities means complying with the law, communicating transparently, competing fairly and succeeding honestly.



# Integrity

## Why it's important

Upholding our reputation is critical to our success and licence to operate. Failing to operate with integrity, even just once, can damage the Adevinta brand significantly, and sometimes irreparably.

We must prevent this risk at all times.



# Respect

## What we expect from you

We expect you to consider the weight of your actions when making decisions - even when you are under pressure or working to a tight time schedule.

Acting with integrity protects you, your team and the Adevinta brand.

## (5) Maintaining accurate records and information

### 5.1 Maintaining accurate records and information

At Adevinta, we are committed to building a culture of trust and resilience. Our measurement, reporting and accounting procedures are designed to protect each other, the company, and our customers. They support us in ensuring that we do not mislead investors, legislators, authorities and the public about commercial aspects of our company. Remember: we win together and lose together.

We all have a responsibility to make sure that disclosures in our public communications are full, fair, accurate, timely and understandable. This is vital when it comes to financial information (e.g. invoices, sales contracts, expense reports, etc.), as well as other important non-financial information which we share between ourselves and external stakeholders.

Statements, forecasts and estimates of any nature should be reasonable and based on data-driven assumptions. This will help us make the right decisions and [act for max impact](#).

**See [Global Travel and Expenses Policy](#), [Procurement Policy](#), [Data Retention Policy](#)**

#### Watch out for these red flags

*"Make the numbers work" / "Put that sale through even though it's not 100% finalised yet" / "Get rid of that before the auditors come in".*



## (6) Procurement and suppliers



### 6.1 Procurement

When it comes to procuring goods or services, our mission is to create perfect matches between Adevinta's requirements and the optimum sources of supply. Our key aims are to:

1. Deliver synergies and cost efficiencies
2. Reduce risk with our suppliers
3. Maximise quality and delivery

Our [Procurement Policy](#) has been developed in alignment with our mission to ensure we have a common process for dealing with suppliers and managing spend across Adevinta.

If you are involved in procuring any goods or services for Adevinta, you must adhere to this policy. During procurement processes, such as bids or tenders, you must not accept any gifts or hospitality that could influence your business decisions.

**See [Sustainable Sourcing Policy](#), [No Purchase Order No Payment Policy](#), [Procurement Policy](#)**

All procurement decisions must be made in alignment with our key aims and not influenced by personal or historic relationships.



### 6.2 Suppliers

We rely on suppliers to enable us to do business. Working with Procurement, following set processes, and using the approved buying channels helps make sure that we work with the suppliers who bring the most value to our organisation and who align with our standards.

We have a [Supplier Code of Conduct](#) which all suppliers must adhere to. Our [Sustainable Sourcing Policy](#) outlines the sustainability considerations to think about when entering into and renewing supplier contracts.

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#### When and how to engage Procurement

You must raise a Buying Request Form to get advice and support from the Procurement Team when:

- The annual amount of your request and/or the total contractual amount is **equal or exceeds €50,000 ex VAT**; and/or
- Any of the following risks are identified in engaging with the supplier: **business criticality, data protection, information security, sustainability & compliance**

You can find more guidance on the [Procurement Policies](#) section of Wave.



# (7) Anti-bribery and corruption



## 7.1 Bribery

**Bribery** is a common form of corruption; it involves the promising, giving or accepting of a gift, payment or other benefits in order to secure an inappropriate outcome or advantage

Bribery is illegal across all geographies in which we operate. All Adevintans have responsibility to avoid any involvement in bribery and to speak up and report any suspected corruption. We should all encourage transparent conversations about situations that could be open to fraud, bribery or corruption.

A wide range of anti-bribery and corruption laws apply to our business and individual marketplaces.

Bribes may be made directly or indirectly (e.g. by having a third party make the payment for our benefit). Both are illegal. You, and Adevinta, could be held liable for a criminal act if a third-party acts corruptly on your behalf - whether or not you are aware of it.

**See *Anti-Bribery and Corruption Policy***

## 7.2 Dealing with government officials

**Corruption** is the abuse of a position of power in order to obtain personal gain

We must be particularly careful when dealing with government officials as there is a heightened risk that our actions could be seen as bribery. The definition of government officials is broad - it includes officers and employees of government authorities, departments or public organisations, and of entities that are government owned or controlled. People that act in an official capacity for governments or public organisations are also government officials.

If you are dealing with government officials, please liaise with our [Public Affairs team](#).

## 7.3 Fraud

**Fraud** involves the false representation of facts intended to result in financial or personal gain

Committing fraud is illegal and therefore strictly prohibited at Adevinta. Unfortunately, any one of us could also be the victim of fraud, which could put our company at risk.

We ask all employees to be vigilant and report any suspicious activity to our [Group Ethics and Compliance team](#).

## Facilitation payments

Facilitation payments are a specific form of bribery. They are unofficial payments (or non-monetary benefits) made to government officials with the intention of expediting an administrative process.

We do not make facilitation payments under any circumstances. If a government official requests that you do so, you should immediately contact your local Legal Counsel.



## What should I do?

A supplier promises to invite my team to a lavish event if we hit a certain sales target. Should I accept the invitation and encourage the team to drive sales with this supplier? They work hard and deserve to celebrate.

This would be considered as a form of bribery. You should not accept a gift or event invitation that might influence or interfere with your decision-making or lead to preferential treatment of a third party.



## (8) Conflicts of interest

### 8.1 Conflicts of interest

Conflicts of interest arise if we have loyalties and interests that compete with our responsibilities at Adevinta, and which could affect the decisions you make at work. This could be as a result of your personal relationships, your participation in activities outside of Adevinta, or your interest in another commercial venture. It's the responsibility of every Adevintan to disclose any potential conflict to your manager in writing.

See [Conflicts of Interest Policy](#)

DISCLOSE

DISCUSS

DECIDE

It's not always clear whether an activity creates a conflict of interest. If you think something might be a conflict of interest, talk to your line manager or our Group Ethics and Compliance Team about it. You can discuss the situation together and make a decision on what to do next.

**REMEMBER** Not reporting a potential conflict of interest is a violation of our Code.

Think it through!



Use the [Decision Framework](#) in Section 2 when in doubt about a potential conflict of interest.





# (9) Gifts, Hospitality and Entertainment



## 9.1 Gifts, Hospitality and Entertainment

**Gifts** include any goods, services or benefits that a business partner may offer you outside of the scope of the transaction or business relationship, regardless of value.

**Entertainment and hospitality** include events such as meals, concerts, sporting events, travels, etc.

Like many businesses, we sometimes give and accept gifts, hospitality or entertainment. In every case, we must think about whether it is appropriate.

Our business decisions must always be based on impartiality. A gift or favour should not be accepted or given if it might create a sense of obligation, compromise your professional judgment, or create the appearance of doing so.

However, sometimes, offering or accepting business gifts or entertainment may be a legitimate and valuable part of our business, but it must always be within reasonable limits that do not exceed company or statutory limits. This tends to include modest forms of hospitality, such as lunches or dinners and occasional gifts of minimal value, which do not influence business decisions. If you feel you are being offered a gift that is more than nominal in value, you must check your local gifts and hospitality policy and consult with your manager.

Offering or accepting entertainment must be approved by your manager. With the exception of meals, offered or accepted entertainment must include an element of information or training.

**See *Conflicts of Interest Policy, Gifts, Hospitality and Entertainment Policy***

## How to know if a gift is excessive or not

Sometimes it's hard to know if a gift is excessive or not. Some examples include:



# (10) Fair Competition

## 10.1 Fair and open competition

Adevinta is committed to free and open competition in order to maintain a healthy economy. We comply with competition laws wherever we operate and compete on the merits of our products and services.

In our mission to create the world's most trusted marketplaces, we strive to protect consumers from unfair business practices. Antitrust and competition laws help us to do this by addressing illegal agreements between companies such as: price fixing, controlling sources of supply, imposing unfair trading conditions, and bundling together products that have no connection.

If you have participated in or witnessed activity in breach of, or assumed to be in breach of, competition laws, please [use your voice](#) and notify your manager and your local Legal Counsel.

**See [Competition Compliance Policy](#), [local Legal Counsel contacts](#)**

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### Possible breaches to look out for

- Discussions or agreements with competitors that may reduce competition in your markets
- Agreements with competitors regarding prices, costs, profits or other trading conditions
- Agreements with competitors that limit or control access to markets, technical development, sources of supply
- Abusing a dominant position in the market by imposing unfair prices or other unfair trading conditions
- Applying dissimilar conditions to equivalent transactions with other trading parties
- Bundling together products that have no connection, so that the consumer has no choice but to acquire both products

# (11) Political activity



## 11.1 Individual political activity

We value the different perspectives each of us brings. Therefore we respect the right of Adevintans to engage in political activity, to support political groups, or government candidates. These activities are voluntary and performed in your own time, at your own expense. You must make it clear that you are acting independently and not as a representative of Adevinta.

## 11.2 Lobbying

Political activities by corporations, including lobbying, are regulated and must be reported or made transparent under the laws of many countries where we do business, and at the EU level. All political and lobbying activities (including meetings with government officials) should be coordinated with our [Public Affairs team](#).

## 11.3 Donations, sponsorships and charitable contributions

Whilst we like to be charitable, we must carefully consider payments to charities or political donations. They must:

- not be made to influence a business outcome; and
- be made to a legitimate, registered organisation

All charitable payments or political donations must be approved by the local CEO / CFO and local Board of Directors, and recorded in the company accounts.



## (12) Social media and communications

### 12.1 Social media and communications

**Everybody's voice matters, and we want you to use yours consciously.**

Whether you are communicating internally or externally, by email, in person, or on social media, it's important that you interact with others respectfully. All Adevintans represent our company, so if you do choose to comment on public content, make it clear that the views are your own.

#### 12.1 One consistent Adevinta voice

At Adevinta, we are committed to clear and consistent communication to maintain the strength of our brand and the confidence of our stakeholders. Any formal communications regarding our company or our brand - whether online or in person - should be coordinated by the Corporate Communications team.

Only trained spokespeople can make comments on behalf of Adevinta. If you are approached by a member of the media, or asked to speak at an event as a representative of Adevinta, please contact our [Corporate Communications Team](#).

**See [Social Media Guidelines](#)**

Conversations can escalate quickly on social media. Pause and consider our Key Behaviours before interacting with content.





## (13) Money laundering and financing terrorism

### 13.1 Money laundering and financing terrorism

**Money laundering** is when a person or group tries to conceal the proceeds of illegal activities, make the sources of their illegal or criminal funds look legitimate.

**Terrorism financing** is the supplying, depositing, distributing or collecting of funds knowing they will be used for terrorist activities.

Adevinta strictly prohibits the use of our platforms for any form of money laundering or financing terrorism. It's all our responsibility to [use our voice](#) and report suspected money laundering or financing of terrorism, to your line manager, your local Legal Counsel, and / or our group Ethics and Compliance team.

We should be especially careful when doing business with partners from countries included in the list of third countries with weak anti-money laundering and terrorist financing regimes of the [EU Commission](#).

### Watch out for these red flags

Requests from customers or potential business partners for cash payments or other unusual payment terms, such as requests to transfer money to a third party or an unknown account.

A customer or potential business partner does not want to provide you with complete information about their business, or you think it may be false.

The person is anxious to avoid reporting or accounting requirements.

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## (14) Sales or promotion of unlawful goods or services

### 14.1 Sale or promotion of unlawful goods

As part of our mission to create the world's most trusted marketplaces, we prohibit the use of our platforms for the promotion or sale of unlawful goods or services, for example, illicit drugs, counterfeit goods, and illegal weapons. Allowing the sale or promotion of unlawful goods or services poses a legal and reputational risk to Adevinta.

Each business within the Group must keep a list of products and services which are not allowed to be sold or promoted on their platform. The list must be in line with the minimum standards set by the Group, as well as with local laws. The list must be incorporated into the user terms and conditions of each website.

If you have concerns about any of the goods or services on our platforms, please contact our [Group Ethics and Compliance team](#).

# Respect



## In this section

- 15 Human rights and the workplace environment
- 16 Respecting the planet





# Integrity

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## What it means

We want Adevinta to be a great organisation to work for.

Central to this is treating each other, and the planet, with dignity and respect.

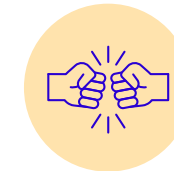


# Protection

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## Why it's important

When we are engaged and empowered, we do our best work. It is important that we foster an environment where everyone feels valued and respected in order to achieve this. Having respect for the planet will enable us to thrive in this way for many years to come.



# Respect

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## What we expect from you

We expect everyone to be conscious of how you treat others, and the planet, in order to make Adevinta a great place to work. If you have any concerns about this, you are expected to report them via the channels noted in this Code.

# (15) Human rights and the workplace environment



## 15.1 Respecting human rights

Integral to our purpose and vision, we aim to make positive changes that shape a healthy planet and society. We care about our communities, and the wider world, and are committed to human rights wherever we do business.

Adevinta strives to prevent, mitigate and remedy adverse impacts that our activities or relationships have on the human rights of our colleagues, consumers, workers in our supply chain and those who live in the communities in which we operate. If you have any concerns about human rights across our supply chain, please contact our [Head of Sustainability](#).

We respect and support international labour rights. This includes the right of individuals to form and participate in groups (either formally or informally) and collective bargaining, in those countries where such rights exist.

**See [Supplier Code of Conduct](#)**

### Did you know?

#### Data privacy is a human rights issue

One of our key human rights is the right to respect your private life. This means data privacy and security is of great importance to us all at Adevinta.

## 15.2 Workplace environment

To enable our people to do their best work, [experiment bravely and act for max impact](#), we want to ensure that Adevinta is a great place to work. We are committed to providing a workplace that is safe and ensures physical and mental health for everyone working within, or visiting, our premises. Every Adevintan has a responsibility to look out for the health of others and maintain a safe workplace environment.

**See [Health and Safety policy](#)**

## 15.3 Diversity, equity and inclusion

We're committed to embracing and encouraging Diversity and Inclusion as a source of creativity and competitive differentiation. We want to maintain a culture that values difference; promotes openness, fairness, and transparency; and that does not tolerate any form of harassment. As an organisation, we aim to [grow through different perspectives](#), and want all our individuals to do this too. If someone's voice is missing or being overshadowed, we ask you to [use your voice](#) to bring attention to theirs.

We recruit, promote and manage our employees based on their talent, their ability to do the job, and the behaviours they demonstrate in line with our core behaviours. It is you who matters. It's that simple. All Adevintans should align with this ethos.

**See [Global Diversity, Equity and Inclusion policy](#)**

## 15.4 Bullying and harassment

**If you are the victim of bullying, harassment or discrimination, you are not the problem. You will be listened to and supported.**

All employees, including hired consultants and trainees, are responsible for behaving appropriately and respectfully towards their colleagues.

If you feel offended as a result of another employee's actions, your subjective interpretation of the incident takes precedence. What you perceive as offensive may not be illegal according to the law, but can still be very inappropriate or unethical in our workplace.

If bullying, sexual harassment or discrimination is proven or established as probable, we will take appropriate measures against the perpetrator.

**See [Global Discrimination, Harassment and Bullying Policy](#)**

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**We work in alignment with the UNGC and the UN Guiding Principles on Business and Human Rights**



## (16) Respecting the planet

### 16.1 Reducing our negative impact on the planet

As one of the largest businesses in the second-hand marketplace sector, we are uniquely positioned to accelerate the growth of the circular economy. However, this does not offset any of our impacts. We are committed to steadily reducing our environmental footprint, namely our greenhouse gas emissions, our energy consumption, our water consumption and waste generation.

We expect all Adevintans to be environmentally conscious at work and support us on our sustainability journey in the office, while travelling, commuting, and hopefully in your own homes too. Please consider how you can contribute to this.

If you are procuring goods or services, our [Sustainable Sourcing Policy](#) can help you make more sustainable choices.

### 16.2 Business travel

Smart working helps us balance the flexibility of remote working with working in the office and maintaining our culture. It gives you the control, autonomy, and scope to set your own working patterns and agendas whilst maintaining the same feeling of belonging.

We encourage you to use video conferencing to minimise the need for travelling between offices which will help us reduce our carbon footprint; but recognise that some moments and rituals are important to spend together in person. If you do have to travel, please consider choosing modes of transport that are more environmentally friendly. For example: trains over planes, public or group organised transportation over taxis, and when public transportation is not available, safe or possible; car sharing over individual car trips.

We believe that Smart Working is a better way of working: better for you, better for our business, and better for our planet.

**See [Smart Working Policy](#), [Global Travel and Expense Policy](#)**





For corrections, queries or comments please contact  
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Adevinta