

# Modern Slavery Statement

## Introduction:

This statement is made by Aurelia UK Feederco Limited (“the Company”) pursuant to section 54 (1) of the UK Modern Slavery Act 2015. On May 29, 2024, the Company indirectly acquired Adevinta ASA, which at a later stage was merged and absorbed by Aurelia Netherlands TargetCo B.V. As the ultimate reporting entity, the Company holds, through its subsidiaries, Aurelia Netherlands TargetCo B.V. and all its controlled subsidiaries as of May 29, 2024. For the purposes of this Modern Slavery Statement, the activities of the Company and its subsidiaries are collectively referred to as “the Group”.

It constitutes the Group’s Modern Slavery Statement for the financial year 2024. The statement outlines the action taken by the Group to identify and mitigate the potential risks of modern slavery related to its business operations and supply chain. The Group does not tolerate modern slavery. We recognise the special responsibility of our sector in this effort and are committed to expanding our work to understand and address all risks of modern slavery that may arise in the course of our business.

## The organisation:

The Group’s portfolio of industry-leading digital marketplaces spans consumer goods, mobility, real estate, holiday rentals and jobs, enabling over 120 million people and over a million businesses across Europe to connect and trade every month. A champion for sustainable commerce, the Group is uniquely positioned to accelerate the growth of the circular economy by enabling the reuse, resale and redistribution of goods through its platforms, as well as helping its users benefit financially.

For more detailed information on our businesses and operations, please visit [www.adevinta.com](http://www.adevinta.com)

## The Group’s commitment:

The Group support to the UN Global Compact’s Ten Principles and the OECD Guidelines for Multinational Enterprises. The Group has established Principles of Corporate Responsibility which outline the principles and standards for conducting responsible business and which reflect the UN Global Compact’s Ten Principles. The Principles of Corporate Responsibility is available to employees on the intranet. In the coming years, the Group will continue to promote these Principles across the entire organisation.

The Group supports and respects the protection of internationally proclaimed human rights as set out in the Universal Declaration of Human Rights and expects the same from the business partners. The Group respects and supports internationally proclaimed labour rights and won’t

use child or forced labour. The Group requires that its local operations act in compliance with such labour rights, including occupational health and safety.

The Group is dedicated to integrating human rights considerations into decision-making processes, as well as into the policy and governance framework. The Board of Directors holds the responsibility for overseeing and guiding the company, and they routinely assess reports on different facets of the business, including associated risks and the strategies implemented to mitigate them.

The [Code of Ethical Conduct](#) (the “Code”) establishes expectations around how the Group conducts itself, encompassing key behaviours and sustainability agenda. The Code sits at the core of the Group’s culture. It inspires the actions we take and the decisions we make, helping to do so with integrity, security, and in line with relevant laws and regulations. The Group looks to build trust and confidence from 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. The Code applies to all those working for, or on behalf of, companies in the Group. This includes the Board of Directors, the Executive team, all employees (whether permanent or on a fixed term contract), as well as anyone working on behalf of the Group. 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. To help every employee understand their responsibilities the Group rolls out mandatory e-learning training across the Group.

Along with the Code, the **Speak Up Policy** informs employees of the various channels available to raise concerns, and it outlines how these concerns are managed and investigated. The Group has also set up different reporting channels for individuals to report actual, or potential, breaches of the Code, other group policies or any other laws or regulations. These channels guarantee confidentiality and include an external third-party reporting platform that facilitates anonymous reporting; they are available 24/7 in different languages. Retaliation against individuals for speaking up is not tolerated and will be treated as a violation of the Code. The Code also includes a section on how to speak up and the available channels to raise concerns.

## Supply chain policies:

The Group clearly recognises its responsibility regarding its supply chain. Given that the business is to run online marketplaces, the bulk of the procurement activity comprises the provision of services, such as IT and professional services; only a smaller part relates to physical products such as ICT equipment and office supplies.

The **Global Procurement Policy** sets out the principles and processes that must be followed by the Group’s employees when sourcing services from third parties and for the ongoing management of those suppliers. The Group conducts various risk assessments to ensure sustainability, compliance, data privacy, vendor information security, and business criticality. The goal is to identify higher-risk suppliers and assess their sustainability and compliance through a comprehensive questionnaire. The Group also engages third-party providers for screening, including sanctions, PEPs (politically exposed persons), and adverse media. Additionally, the Group prioritises data privacy by respecting individuals’ rights and conducting a Data Privacy

Risk Assessment. The vendor's cybersecurity maturity is evaluated through a Vendor Security Risk Assessment. For critical suppliers and products, business continuity plans were developed based on a Business Criticality Risk Assessment to protect operations, personnel, and assets in the face of threats or disasters, minimising the impact on operations and revenue.

The **Sustainable Sourcing Policy** serves for employees to spread, promote and embed the consideration of environmental, social and ethical factors throughout the sourcing lifecycle for supplier evaluation and prioritisation. This Sustainable Sourcing Policy is complementary to the Supplier Code of Conduct and together they define the set of environmental, social, and ethical standards for suppliers to have a relationship with the Group. When dealing with suppliers, employees are required to ensure that they accept the Supplier Code of Conduct during the onboarding process (or renewal process as applicable).

The [Supplier Code of Conduct](#) is applicable to all suppliers, who in turn are responsible for ensuring that suppliers and other participants in their own supply chains adhere to the same responsibilities set out in the Code. The Supplier Code of Conduct embodies the commitment to conduct business with integrity, openness and respect, in line with internationally recognised corporate sustainability principles on human rights, labour rights, the environment and anti-corruption, while also focusing on key aspects which are essential to the Group.

Together with these policies, responsible business implies creating marketplaces that are reliable, efficient, and safe for users. The Group's classified sites work proactively to prevent various forms of undesirable activity such as advertising of illegal or unethical products, illegal marketing, and fraud.

## Overview of 2024:

In 2024, the Group made progress on several key initiatives to enhance compliance and sustainability efforts. First, reviewing the procurement taxonomy to identify categories requiring detailed analysis from risk, compliance, and sustainability perspectives. This work enabled us to better understand suppliers, considering their country and industry-specific risks, particularly in areas with potential human rights concerns. Second, conducting a Human Rights Risk Assessment, mapping the most strategic suppliers and business associates and performing a supplier risk evaluation. This effort will inform changes to risk questionnaires, allowing us to identify suppliers requiring closer scrutiny during onboarding, particularly for forced labor and child labor risks. Finally, updating the Speak Up Policy to align fully with Directive (EU) 2019/1937 (the EU Whistleblowing Directive), ensuring compliance as the Group falls within its scope.

## Approval:

This is a consolidated statement approved by Aurelia UK FeederCo Limited and it applies to all of its subsidiaries.

Maddalena Uggeri, Chief People & Communications Officer, 2025.