

# LEGAL COMPLIANCE POLICY

*(Adopted by the Board of Directors on 12 June 2020)*

## 1. Introduction

This Legal Compliance Policy (the “Policy”) reflects the commitment of Adevinta to conduct its business in accordance with applicable laws, rules and regulations, as well as the codes and standards that the Adevinta Group has adopted. This Policy applies to Adevinta ASA (“Adevinta”) and any subsidiary company which is directly or indirectly controlled by Adevinta, or in which Adevinta directly or indirectly owns more than 50% of the shares (collectively, the “Adevinta Group”).

For those companies where the Group owns an interest which falls below such control (eg joint ventures and minority investments), the director(s) appointed by the Group to the Board of such Company shall promote the principles outlined in this Code.

This Policy also sets out the basic requirements for Legal Compliance Programmes across the Adevinta Group and the minimum standards that apply to these programmes.

The objective of this Policy is to protect the Adevinta Group and its employees from behaviour that is not compliant with laws and regulations. Additionally, it aims to ensure that Adevinta employees understand the importance of conducting business in a legally compliant manner and respect the principles that are set out in the Adevinta Code of Conduct.

Leaders of each of the Adevinta Group’s business units must lead legal compliance efforts by creating a business environment in which employees understand their duties and feel free to raise issues relating to compliance without fear of retaliation.

## 2. Who must follow the Policy

This Policy applies to all companies in the Adevinta Group and to all directors, officers and employees of these companies, who must adhere to the Policy and promptly raise concerns about any actual or threatened violations. Employees and directors who breach the Policy are subject to disciplinary action up to and including dismissal.

### 3. Applicable Laws and Regulations

The Adevinta Group operates in a regulated environment and in many different countries and regions, each with its own set of laws, rules and regulations.

It is not possible for an Adevinta employee or director to know and understand every law, rule and regulation to which the Adevinta Group may be subject. It is, however, important for the management of each business unit within the Adevinta Group to have an understanding of the laws, rules and regulations that apply to the business for which the relevant management is responsible and to ensure that the employees of such segment and business unit comply with such laws, rules and regulations.

If a manager is uncertain about which laws, rules or regulations apply or about their terms, then he or she should consult the relevant Legal Compliance Officer (see section 4).

### 4. Legal Compliance Officers

Each operating company in the Group must appoint a Legal Compliance Officer who will:

- be responsible for the implementation of this Policy and for legal compliance within the relevant operating company;
- raise any actual or perceived breaches of this policy or the Code of Conduct with company or Group management (as applicable);
- determine the appropriate steps to ensure compliance, and how to address breaches.

### 5. Legal Compliance Programme

Each business unit is required to implement a Legal Compliance Programme to enable effective management, monitoring and reporting of legal compliance.

The Legal Compliance Officer is responsible for the design and implementation of the Legal Compliance Programme within his or her segment. Each Legal Compliance Programme should be built on risk analysis and be tailored for the specific segment. Every Legal Compliance Programme must include the following minimum elements:

- a clearly defined legal compliance structure;
- the monitoring of applicable laws, regulations and key compliance risks relating to the business activities of the segment;

- clear policies and procedures based on the Adevinta Group's minimum standards supplemented by any business-specific or additional local requirements;
- a training and awareness programme focussed on the key compliance risk areas that have been identified;
- a process setting out how to identify and respond to compliance risks, incidents and issues;
- monitoring, reviewing and improving the Legal Compliance Programme on an ongoing basis (including continual monitoring of the regulatory environment and developing appropriate responses to changes and developments).

## 6. Core Components

Each Legal Compliance Programme must at least include the following core components that set minimum standards that apply across the Adevinta Group:

1. This Legal Compliance Programme
2. The Code of Ethical Conduct and Corporate Responsibility
3. Anti-Bribery and Anti-Corruption Policy (incl Third-Party Due Diligence Guidance)
4. Competition Compliance Policy
5. Sanctions and Export Controls Policy.

## 7. Monitoring

The Group will monitor the adequacy and effectiveness of its compliance procedures from time to time. The Adevinta Board may also require other independent assurance on the effectiveness of the Legal Compliance Programme from time to time.

## 8. Key Contacts and other information

The following are key contacts in respect of this Policy:

Adevinta Group Legal: [legal@adevinta.com](mailto:legal@adevinta.com)

Adevinta Governance and Ethics: [legal-ethics@adevinta.com](mailto:legal-ethics@adevinta.com)

If you have any concerns regarding specific breaches of this policy, you can contact the above, or refer to the process for raising concerns regarding unethical business conduct, as set out in the Code of Ethical Conduct and Corporate Responsibility.