

# Modern Slavery Statement

## Introduction:

This statement is made by Adevinta pursuant to section 54 (1) of the UK Modern Slavery Act 2015. It constitutes Adevinta's modern slavery statement for the financial year 2024. The statement outlines the action taken by Adevinta to identify and mitigate the potential risks of modern slavery related to its business operations and supply chain. Adevinta 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.

## Our organisation:

We are a leading online classifieds specialist, operating digital marketplaces in 11 countries and providing digital services to connect buyers with sellers and facilitate transactions. Our portfolio of 25+ digital marketplaces spans consumer goods, mobility, real estate, holiday rentals and jobs. Every month, our industry-leading technology enables more than 120 million people and over a million businesses across Europe to connect and trade. Loved local brands include leboncoin in France; mobile.de and Kleinanzeigen in Germany; Fotocasa and InfoJobs in Spain; Subito in Italy; Marktplaats in the Netherlands and the Canadian marketplace Kijiji. The group has subsidiaries located in the United Kingdom.

Our international team of diverse individuals are united in their purpose to make an impact on the environment, the economy and society, every single day. We employ around 5,300 people, including some 3,000 working in product and technology teams, committed to supporting users and customers daily. For more information on our organisation structure, please visit our [Annual Report 2023](#).

## Adevinta's commitment:

Adevinta adheres to the UN Global Compact's Ten Principles and the OECD Guidelines for Multinational Enterprises. Adevinta has established Principles of Corporate Responsibility which outline the Company's 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 all our people on the intranet. In the coming years, we will continue to promote these Principles across our entire organisation.

Adevinta 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 our business partners. Adevinta respects and supports internationally proclaimed labour rights and we will

not use child or forced labour. Adevinta requires that its local operations act in compliance with such labour rights, including occupational health and safety.

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

In 2022 we updated our [Code of Ethical Conduct \(the “Code”\)](#) 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. At Adevinta 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. 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. Following the launch of the revised Code, the Ethics and Compliance team rolled out mandatory e-learning training across the Group, to help every employee understand their responsibilities.

Together with the Code, we updated the **Speak Up Policy** which informs employees of the various channels available to raise concerns, and it outlines how these concerns are managed and investigated. We have 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.

## Our supply chain policies:

Adevinta clearly recognises its responsibility regarding its supply chain. Given that our business is to run online marketplaces, the bulk of our 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.

Our **Global Procurement Policy** sets out the principles and processes that must be followed by Adevinta employees when sourcing services from third parties and for the ongoing management of those suppliers. We conduct various risk assessments to ensure sustainability, compliance, data privacy, vendor information security, and business criticality. Our goal is to identify higher-risk suppliers and assess their sustainability and compliance through a comprehensive questionnaire. We also engage third-party providers for screening, including sanctions, PEPs

(politically exposed persons), and adverse media. Additionally, we prioritise 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, we develop business continuity plans based on a Business Criticality Risk Assessment to protect operations, personnel, and assets in the face of threats or disasters, minimising the impact on our operations and revenue.

We have also developed a **Sustainable Sourcing Policy** for our 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 Adevinta's Supplier Code of Conduct and together they define the set of environmental, social, and ethical standards for suppliers to have a relationship with Adevinta. 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 our 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, for our marketplace operations, responsible business implies creating marketplaces that are reliable, efficient, and safe for our users. Our classifieds sites work proactively to prevent various forms of undesirable activity such as advertising of illegal or unethical products, illegal marketing, and fraud.

## Looking ahead:

We will keep working to identify potential cases of forced labour and minimise any risks associated with our supply chain and business partners in general. In 2023 we fully aligned our Speak Up policy with the requirements of the EU Whistleblower Directive. In order to keep us accountable, we have started to:

- Review in-depth Adevinta's current ESG risk assessment process. Together with this, we will review our Supplier Risk Assessment Questionnaire to include more ESG-related questions.
- Conduct a human rights saliency assessment to have a robust overview of all potential human rights and environmental issues pertaining to Adevinta's operations and supply chain.

In the near future we also plan to:

- Review Adevinta's current sustainability policies and processes to understand how these align/diverge from HREDD good practice.
- Introduce an independent human rights policy.

- Raise awareness and competence of employees by introducing other e-learning programmes focusing on human rights and labour standards.
- Strengthen further the process of continuous risk assessment to identify potential adverse impact.

## Approval:

This is a consolidated statement approved by Adevinta AS and applies to all its subsidiaries.

Nicki Dexter, Chief People & Communications Officer, 2024.