

The Norwegian Transparency Act Statement

Definition of the Norwegian Transparency Act:

Adevinta adheres to internationally recognised principles and guidelines such as the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises and the principles of the United Nations Global Compact. On 1 July 2022, the Norwegian Transparency Act (the "Act") came into force. The Act provides that companies should:

- Conduct human rights due diligence in their own business operations and value chain.
- Be publicly accountable for their due diligence, including their procedures and identified risks.
- Provide information upon request.

The latter requires companies to respond to enquiries from the public about how the company is dealing with actual or potential human rights impacts in its organisation and supply chain.

Our commitment:

Adevinta is committed to being open and transparent about how we conduct our due diligence and promote respect for essential human rights and decent working conditions. We reject modern slavery in all its forms and are committed to maintaining and developing appropriate safeguards against the mistreatment of people within our business and supply chain.

Adevinta at a Glance:

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.

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](#).

Our Due Diligence Processes:

We reviewed Adevinta's Code of Ethical Conduct and the related Principles of Corporate Responsibility and merged these separate documents into a new Adevinta Code of Ethical Conduct (the Code). This document was approved by the Board of Directors and is applicable across Adevinta ASA and all consolidated subsidiaries. The Code sits at the core of Adevinta's culture and encompasses Adevinta's Key Behaviours and the sustainability agenda. Structured in three main sections, the Code sets out the basic requirements for business conduct and serves as a foundation for company policies, procedures and guidelines. The Ethics and Compliance team rolled out mandatory e-learning training across the Group, to help every employee understand their responsibilities.

The Speak Up policy 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 suspected, breaches of the Code, other group policies or any other laws or regulations.

Before entering new markets, Adevinta always conducts country risk assessments and adequate due diligence. Our due diligence procedure is based on the [UN Global Compact principles](#) and [Adevinta's Principles of Corporate Responsibility](#), as well as applicable and relevant sanctions regimes from the UN, the EU and the US. For more information:

- Read our [Code of Ethical Conduct](#)
- Read our [Modern Slavery Statement](#)
- Read our [Speak Up and Investigations Policy](#)

Our Risk Based Approach:

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 link the management of our suppliers with sustainability, compliance, data privacy, vendor information security, and business criticality topics. 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, and adverse media. Additionally, we prioritise data privacy by respecting individuals' rights and conducting a Data Privacy Risk Assessment and 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.

- Read our [Vendor Minimum Security Measurements](#)
- Read our [Supplier Code of Conduct](#)
- Read our [Sanctions and Exports Controls Policy](#)
- Read our [Anti-bribery and Anti-Corruption Policy](#)

Next steps:

A key requirement of the Transparency Act is the duty to conduct integrity due diligence in accordance with the OECD Guidelines for Multinational Enterprises. This includes the duty to determine whether Adevinta's activities could have actual or potential adverse consequences in relation to human rights and decent work conditions, to take preventive measures to avoid or limit such consequences, to monitor third parties on an ongoing basis and to communicate with affected parties. This is why 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.

Inquiries:

If you have any questions about how Adevinta addresses and manages human rights and decent work, please send your enquiry in writing to: sustainability@adevinta.com