

ADEVINTA ASA - PRINCIPLES OF CORPORATE RESPONSIBILITY

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

Introduction

As a multinational company, Adevinta recognises its responsibility as a corporate citizen and aims to create value for our shareholders as well as other key stakeholders. Adevinta aims to hold itself accountable for its sustainability performance and to be transparent about both the positive and negative impacts of our business. In particular, Adevinta adheres to the 10 UN Global Compact principles and the OECD Guidelines for Multinational Enterprises.

This document (the **Principles of Corporate Responsibility**) sets out the basic standards of behaviour that Adevinta ASA (**Adevinta** or the **Company**) expects of all individuals and companies across the Adevinta Group to follow to ensure that we consider, and contribute positively toward, the interests of all our stakeholders.

Application across the Adevinta Group

Adevinta Group

These Principles apply to all companies in the Adevinta Group and all directors, officers and employees of companies within the Adevinta Group.

The Adevinta Group (the **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.

Joint ventures & minority investments

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

If no equivalent Principles exists and attempts to implement the Group's Principles are unsuccessful, the board member(s) shall notify the Group CEO and General Counsel, allowing the Group to take appropriate action based on a risk assessment.

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Additional resources

At the end of this document, there is a list of resources that you can contact if you:

- (a) have any questions regarding the application or operation of these Principles; or
 - (b) need to raise any concerns regarding a breach of these Principles.
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Our principles

1. Responsibility towards our employees

Labour rights

The Group respects and supports internationally proclaimed labour rights. We recognize and respect the right of employees to associate and their right to collective bargaining, in those countries in which such rights legally exist. We will not use child or forced labour. The Group shall ensure that its operations do not cause any infringement with such labour rights, including occupational health and safety.

Equal opportunity and anti-discrimination

As the Group is a knowledge-based enterprise we are reliant upon talented employees. We will ensure that employment-related decisions are based on relevant qualifications, merit, performance and other job-related factors. We will not tolerate discrimination relating to employment.

All Employees shall help to create a work environment free from any discrimination, due to religion, skin colour, gender, sexual orientation, age, nationality, race and disability. Further details on our principles in respect of diversity and inclusion are set out in the Group's Diversity & Inclusion Policy available [here](#).

Key principles:

- Treat others with respect and behave fairly towards them.
- Base employment decisions on job qualifications (e.g. education, prior experience) and merit.
- Make employment related decisions and actions without regard to a person's race, religion, gender, sexual orientation, age, disability or other characteristics protected by law.

Bullying & Harassment

The Group has a zero tolerance for any form of bullying or harassment. Bullying is behaviour, either physical and verbal, intended to disturb or upset another person. Harassment is the repetition of such behaviour.

Our principles:

- Treat others with respect and avoid situations that may be perceived as inappropriate.
- Be sensitive to actions or behaviours that may be acceptable in one culture but not in another.
- Discrimination in hiring, compensation, training, promotion, termination or retirement based on ethnic and national or social origin, religion, sex or other distinguishing characteristics is never acceptable.

Further details on our principles in respect of diversity and inclusion are set out in the Group's Bullying & Harassment Policy available [here](#).

2. Responsibility towards protecting Adevinta's assets

Adevinta strives to give employees the tools they need – equipment and information – to be effective. Accordingly, Adevinta expects everyone to be respectful of the company's assets. This includes physical assets (such as IT equipment), as well as non-physical assets (such as confidential information and intellectual property rights).

All assets must be handled with care to avoid loss, theft or damage.

Confidential information

We all have a responsibility to prevent unauthorized persons, both internal and external, from gaining access to confidential information relating to the Group, our people, business partners, users and readers.

Confidential information is information that is not, and should not be known to the public. Examples include information on transactions, business plans, product development plans, budgets and results.

Example:

Elisabeth is very busy at work and is on a tight deadline to write a memo to the Board. She is scheduled for a one-hour flight this afternoon and figures this is a great opportunity to finish the Board memo.

Would it be appropriate for Elisabeth to write the Board memo on the plane?

No. As a general rule, Elisabeth should not write confidential information when on planes since this is a public place and someone sitting next to her may read the memo and get confidential information not intended for the public.

Key principles:

- Always protect confidential information.
- Never discuss, read or write confidential information in public places, such as in the street, in restaurants, on planes, in trains or in elevators etc.
- Be careful when sending or forwarding confidential information via email. Always check the list of recipients to make sure that each recipient needs to know the information.
- Never share confidential information in any online forums, such as blogs or social media.
- If you need to share confidential information with external parties, always ensure that the third party is subject to confidentiality obligations or obtain a signed confidentiality agreement.
- If you leave the Group, your obligation to protect confidential information continues until the information becomes publicly available.
- If in doubt whether you hold confidential information or how to handle confidential information, consult your manager or assume that the information is confidential.

Intellectual Property

Adevinta is committed to protecting its intellectual property, such as trademarks, processes, and technology, from infringement by others. The Company has created this intellectual property via significant investments of time and Company funds. If our intellectual property is not properly protected, it becomes available to others who have not made similar investments. This would cause us to lose our competitive advantage and compromise our ability to provide unique services to our customers.

Our principles in respect of intellectual property are set out in the Group's Intellectual Property Policy, available soon.

Information Technology

Adevinta's information technology systems are there to help everyone work efficiently and professionally. Generally, such systems should be used only for business purposes, in a manner that does not violate the rights or interests of the Group.

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Our principles in respect of intellectual property are set out in the Group's Information Technology Policy, available soon.

3. Responsibility towards our user's, customers and clients

The Group's customers shall always be met with insight, respect and understanding.

Privacy & Data protection

User data is an essential driver to our product development and growth strategy. Hence, we highly value our users' privacy and grant the utmost importance to protecting our user data.

We equally respect our employees' privacy rights by processing personal data always in accordance with accepted data protection standards. We will at all times process our user and employee data only where we have a valid legal basis to do so and shall respect the following key principles:

Key principles:

- Transparency - we want to inform transparently about the data we collect, why we collect it, with whom we share it and on what grounds.
- Control - we honour our users' choices and offer control options to decide what data they want to share with us wherever possible.
- Accessibility - we grant our users access to the data we process about them and offer user friendly options to update their data.
- Limitation - we will avoid any unnecessary sharing of data with third parties and will only share data with third parties under a valid legal basis.
- Retention - we have retention policies in place setting out retention periods and deletion mechanisms for each data category we are processing.
- Training - our employees will receive regular training on privacy and data protection.

4. Responsibility towards our community and society

Human rights

The Group supports and respects the protection of internationally proclaimed human rights. This means that we conduct our activities in a manner that respects human rights as set out in

the United Nations Declaration of Human Rights, we do not tolerate human rights abuses, and we demand the same from our business partners.

In our workforce or supply chain, we will not tolerate any form of forced or compulsory labour or the use of child labour.

The environment

The Group is committed to minimizing the environmental impact that our operations may have on the environment. The Group shall adhere to relevant local and internationally recognized standards.

Political activity

The Group does not financially support political parties or individual politicians. Employees may participate in political activity without reference to the Group or to their employment with the Group.

Improper use of our platforms

The Group is opposed to any use of our platforms to support unlawful purposes. This includes:

- sale or promotion of unlawful goods or services;
- money laundering and terrorism financing.

Sale or promotion of unlawful good or services

The Group prohibits the use of its classified advertising platforms for the promotion or sale of unlawful goods or services, for example, illicit drugs, counterfeit goods, weapons.

Our principles:

- Each business within the Group is required to keep a list of products and services which are prohibited from sale or promotion on that business's platform.
- The list shall comply with the minimum standards set by the Group, as well as the requirements of the local laws in which the business operates. The list must be incorporated into the user terms and conditions of each operating website.

Money laundering and terrorism financing

Money laundering is the process by which a persons or group tries to conceal the proceeds of illegal activities or try to make the sources of their illegal or criminal funds look legitimate. The Group will report any suspected money laundering to the relevant authorities.

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Terrorism financing is the supplying, depositing, distributing or collecting of funds by any means with the intention of using them, or in the knowledge that they will be used, for the purpose of the planning or commission of terrorist activities. Terrorism Financing is closely associated with money laundering.

The Group prohibits the use of our platforms for any form of money laundering or terrorism financing.

Our principles:

- Contact your immediate manager if a customer or potential business partner does not want to provide you with complete information about their business, if you suspect the information to be false, or if the person is anxious to avoid reporting or accounting requirements.
- Be aware of red flags such as 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. If you suspect any potential money laundering activities, report the situation to your immediate manager.
- 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:
https://ec.europa.eu/commission/presscorner/detail/en/IP_19_781

Example money laundering:

Paula discovers a pattern where two people exchange large amounts of money through several purchases at one of Adevinta's marketplaces. She suspects that the money could be from illegal activities.

What should Paula do?

Paula should immediately inform her boss who will decide whether the police should be informed.

Competition (anti-trust) laws

The Group and all its employees must comply with competition laws.

Competition laws (also known as 'anti-trust' laws) are intended to protect consumers by prohibiting (i) agreements and understandings between competing businesses that are

intended to or could restrict competition, and (ii) the abuse of power by a business that dominates a specific market.

In many countries, authorities impose **criminal liability** upon both the company and the individuals involved in anti-competitive conduct.

Our principles:

- Do not participate in any discussions or enter into agreements with competitors that may reduce competition in your markets.
- Agreements with competitors regarding the issues below will normally be prohibited, and shall not be entered into without written pre-approval from the Legal Department:
 - Agreements regarding prices, costs, profits or other trading conditions.
 - Agreements that limit or control access to markets, technical development, sources of supply.
- If a company has a dominant position within a market, it shall not abuse the dominant position, for instance 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.

If you have participated in or witnessed activity in breach of or assumed to be in breach of competition laws, notify your manager and your local legal manager.

Example competition laws:

Kim is employed in the Group. He participates in a meeting attended by competitors of his company. The other participants start discussing minimum prices on their products.

What should Kim do?

Kim should state clearly that the forum is not appropriate for such discussions, and leave the meeting if the discussion continues. He should notify his manager and his local legal manager or the Adevinta Group General Counsel.

5. Our accountability for sustainable corporate responsibility

Adevinta annually discloses sustainability performance data for the Group as well as progress on targets as part of its annual report according to the requirements defined by the European Union and Norwegian laws.

Sustainable Performance Data includes social and employee-related matters; respect for human rights; anti-corruption and bribery matters; environmental issues; how these are embedded in the company's value chain and notably for suppliers, and other information such as tax.

The management of this information should be treated with an equivalent level of responsibility as we treat our financial information. Accordingly, falsifying, concealing, altering or destroying company information, or creating misleading information will not be tolerated by the Group.

Resources

Questions or comments

If you have any questions or comments regarding these Principles, you can contact any of the following:

- Your local legal and compliance officer
- Adevinta Group Legal: legal@adevinta.com
- Adevinta Governance and Ethics: legal-ethics@adevinta.com

Reporting concerns

If you have any concerns regarding non-compliance with these Principles, you can raise them via the above resources, or via the Group's whistleblower process - details of which are available [on Wave](#).