

# ADEVINTA SANCTIONS AND EXPORTS CONTROLS POLICY

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

## 1. Objective

Adevinta operates in many countries and markets globally. We have a wide range of ethical and legal responsibilities. We operate subject to applicable laws and regulations and in accordance with our Code of Ethical Conduct and Corporate Responsibility. The laws that apply to us include laws relating to economic and trade sanctions (Sanctions).

The objective of this Policy is to ensure that Adevinta employees (when referring to employees, this includes Adevinta' employees, temporary and permanent as well as board members) understand the importance of economic and trade sanctions, and what their responsibilities are (i.e. what they may and may not do).

This Policy sets out the minimum standards for compliance with sanctions and applies to all the companies in the Adevinta Group. (The Adevinta Group means Adevinta and its subsidiaries. A "subsidiary" is a company in which Adevinta has a shareholding of more than 50% - whether direct or indirect.)

## 2. What are Sanctions?

Sanctions are measures taken by international bodies (such as the United Nations (UN) or the European Union (EU)) or countries (such as Norway or the United States (US)) that restrict or prohibit trade with certain countries, organisations and individuals.

Sanctions can target:

- Countries or regions: Sanctions targeted at countries or regions can restrict Adevinta from conducting business in those areas. For example, we may be prohibited from travelling to or making investments or creating joint ventures in the affected territory. The movement of certain goods to these countries may also be restricted.
- Organisations and individuals: Sanctions targeted at organisations and/or individuals can restrict Adevinta from doing business with these organisations and/or individuals
- Goods: Sanctions can restrict the export of goods (including technology and software). The detailed specifications and potential use of these products and their end-use determine whether they may be exported (at all) and, if the export is permitted, whether a license is required.

Examples may include facilitating the sale of technology equipment to a country which is subject to sanctions preventing trade in military equipment (as much technology can be adapted to military use), or providing a sales platform to a professional seller which is owned by a prohibited individual.

### 3. Why are Sanctions important for Adevinta?

The purpose of Sanctions is to change the behaviour of the targeted countries, organisations and individuals. Sanctions may be based, for example, on concerns relating to national security, terrorism, money laundering, human rights violations or the development of weapons of mass destruction. Nations and multinational bodies use Sanctions to safeguard society or effect change without resorting to more interventionist actions.

Adevinta conducts business legally. It is therefore important for Adevinta to comply with applicable Sanctions.

In addition, a failure to comply with Sanctions could also constitute a breach of the law and carries the risk of Adevinta suffering significant fines and reputational damage (that could result in the reduced trust from the community and our key stakeholders). In addition, breaches of Sanctions could lead to goods being delayed or seized or payments frozen that may have significant adverse consequences for our operations.

For employees, a breach of this Policy could result in disciplinary action that may lead to dismissal (in addition to any criminal liability that may follow as a consequence of breaching the relevant Sanctions).

### 4. How do we comply with Sanctions controls?

We are committed to complying with applicable Sanctions. In practice, this means that:

#### 4.1 The Dont's

- **We do not perform illegal activities in countries that are subject to Sanctions.** Sanctions can differ from country to country. For some countries, only specific activities are restricted. In other countries, nearly all business activities are restricted.
- **We do not illegally export controlled goods without the required governmental approvals and licenses.** Controlled goods need to be registered with the applicable authorities and also need a license before they are exported.
- **We do not illegally provide prohibited products and/or services to sanctioned individuals or organisations.** Sanctions can prohibit certain products or services from being provided to certain individuals or organisations.

- **We do not illegally circumvent applicable Sanctions.** We do not engage whether directly or indirectly in business activities that violate Sanctions. We do not circumvent Sanctions by using third parties to provide products or services to a sanctioned country, entity or individual.

#### 4.2 The Do's

- **We comply with all Sanctions to the extent these apply to us (whether UN, EU, US or more local Sanctions).** Adevinta companies assess which sanctions regulations apply to them, and comply accordingly.
- **We are aware of Sanctions risks.** We are aware of the consequences of our actions and business activities from a Sanctions perspective. We assess our risk profiles and know-how Sanctions impact our businesses.
- **Where legally required we screen third parties:** As Sanctions can restrict business activities with individuals and entities, we perform an appropriate level of risk-based screening of our third parties to determine whether or not Sanctions apply to them.
- **We understand (and classify) those goods that we export which are restricted by Sanctions** (including looking at their end-use) and are aware of any applicable export restrictions and license requirements.
- **We screen transactions (to the extent legally necessary) against the relevant Sanctions and export control lists.** (We do this using a combination of product, destination, customer and end-use control to identify and prevent illegal business in sanctioned territories and/or with sanctioned entities.)
- **We have a Sanctions Compliance Programme in place** that is appropriate for the Sanctions exposure of the relevant segment.
- **We consult our Legal Compliance Officer** if we have any doubts about whether Sanctions apply or if any red flags are raised relating to Sanctions.

If in any doubt, please contact the legal team at the contact details below.

#### 4.3 Example

Nikita is the Head of Business Development in the Adevinta Group and wishes to establish a new marketplace for the sale of technology hardware targeted at developing economies. She believes that there may be strong demand from some middle eastern and Latin American countries who have difficulty accessing these products from regular supply chains in Europe and the US. Nikita thinks this is unusual but presents a great opportunity.

What should Nikita do?

The fact that normal supply chains do not provide certain products to specific countries is an indication that there is a regulatory barrier to doing so. Before proceeding with the project Nikita should contact the Adevinta Legal Team and check whether there are any laws which would prevent doing business in those countries.

## 5. Policy scope and governance

All companies in the Adevinta Group must comply with these minimum standards.

The prior written approval of Adevinta's General Counsel is required for any deviation from this policy.

Each local Legal Compliance Officer is responsible for the implementation of this policy in the entities for which they are responsible through an Anti-Bribery and Anti-Corruption Programme that is developed in cooperation with business and management and takes account of specific local circumstances. The Legal Compliance Officer will report to the Adevinta Group on the implementation of this programme.

Adevinta's General Counsel is the ultimate owner of this Policy (and related documents) and has overall responsibility for the implementation of this Policy in the Adevinta Group.

This Policy will be reviewed on an annual basis by Adevinta's General Counsel and, in addition, may be reviewed from time to time to take account of, for example, changes to legislation, regulatory developments or organizational changes.

## 6. Key contacts and additional 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](#) and the Policies section of our intranet.