



Adevinta Sustainability Report 2022

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 spans more than 25 digital brands, attracting approximately 2.5 billion average monthly visits. Noted assets include top-ranked leboncoin in France, Germany's leading classifieds sites mobile.de and eBay Kleinanzeigen, Marktplaats in the Netherlands, Fotocasa, Habitaclia and InfoJobs in Spain, Subito in Italy and 50% of OLX Brasil. We employ around 5,700* people, including some 3,000 working in product and technology teams, committed to supporting users and customers daily.

Adevinta is a sustainability leader within the Dow Jones Sustainability Index (DJSI) Europe.

* Excluding Joint ventures and Contingent workers

OUR PURPOSE

We make a positive change by helping everything and everyone find new purpose...

OUR MISSION

by creating perfect matches on the world's most trusted marketplaces...

OUR VISION

with sustainable commerce shaping a healthy planet and society.

CEO Message

Our business model has always supported a vision of a more sustainable way of living. We make it easier for people to reuse things and, by encouraging people to make second-hand their first choice, we provide lasting positive impacts in the circular economy.

This is in our DNA and, across all of our markets, more and more people are learning how they can leverage platforms like ours to demonstrate their commitment to a more sustainable type of commerce.

In 2022, our sustainability team focused on setting up an environmental data collection system in parallel with a data calculation tool that will help us define our greenhouse gas baseline. This work is an important part of our long-term ambition to reduce greenhouse gas emissions. Publication of our 2021 Second Hand Effect report – which provides information on the potential savings on plastic, steel, aluminium and CO₂ arising from the transactions on our platforms – was released at the end of 2022 as we waited to include ebay Kleinanzeigen in the process.

Meanwhile, we are trying to embed sustainability more deeply across our product and technology operations. In 2022, with the help of external expertise and by organising greentech workshops, a core team in our tech community at leboncoin did some good initial work at the grassroots level in raising awareness of greentech best practices.

In terms of social sustainability, we continued to build a strong inclusive culture at Adevința with high scores for our diversity, equity and inclusion stance in our 2022 engagement survey. We piloted a purpose-driven leadership programme for our leadership community. By year end, our learning and development programmes, as well as our talent pipeline initiatives, had also made good progress. Our community engagement work continued to raise money for worthy causes, support important community initiatives and promote topical issues.

One of our key governance responsibilities, as the digital economy grows and we enhance our ecommerce tools to provide superior digital experiences, is to strengthen protection for our customers and end users. As part of our mission to provide the world's most trusted marketplaces, we continue to invest vigorously in the

human skills and technology that provide anti-fraud capabilities, data privacy and cyber security. During the year, we defined a new global data privacy strategy, and we launched our new global cyber security strategy.

At the end of 2022, we were recognised once again as a sustainability leader in the Dow Jones Sustainability Index (DJSI) Europe. The citation noted our advances in business ethics, risk management, cyber security and indirect greenhouse gas emissions reporting. We are grateful for that recognition and we intend to make further improvements within our ESG roadmap.

We want to strengthen all the benefits we deliver. A good example is how we are helping consumers at a time when many are seeking more cost-efficient ways to buy products. We are deeply engaged in building a shared digital future because digitisation is essential for social and educational progress. Moreover, we play an important role in local economies. At leboncoin in France, around 80% of transactions are made within a radius of 30 kilometres. Our buyers and sellers clearly want to engage with the local economy and we help them do that. Above all, our marketplaces are open to all and offer access to opportunities that would not exist for many.

Looking ahead, our aim is to collaborate with stakeholders who want to go beyond 'business as usual'. After all, a vital element of Adevința's purpose is to 'make a positive change'. We are already in tune with our younger generation, which I believe has a strong desire to change the way we consume. We also see many large corporations trying to align more closely with sustainable business development and I strongly believe that those companies that fail to adjust will encounter difficulties. At Adevința, we are not afraid of change; we embrace it, we want to lead change and become a champion of sustainable commerce. In the following pages we have outlined some of our progress in the past year as we pursue our ambitions.

28.2m

Tonnes of carbon emissions (CO₂e) were potentially saved in 2021 arising from the transactions on our platforms



Antoine Jouteau
CEO Adevința

Photography: @Lea Crespi

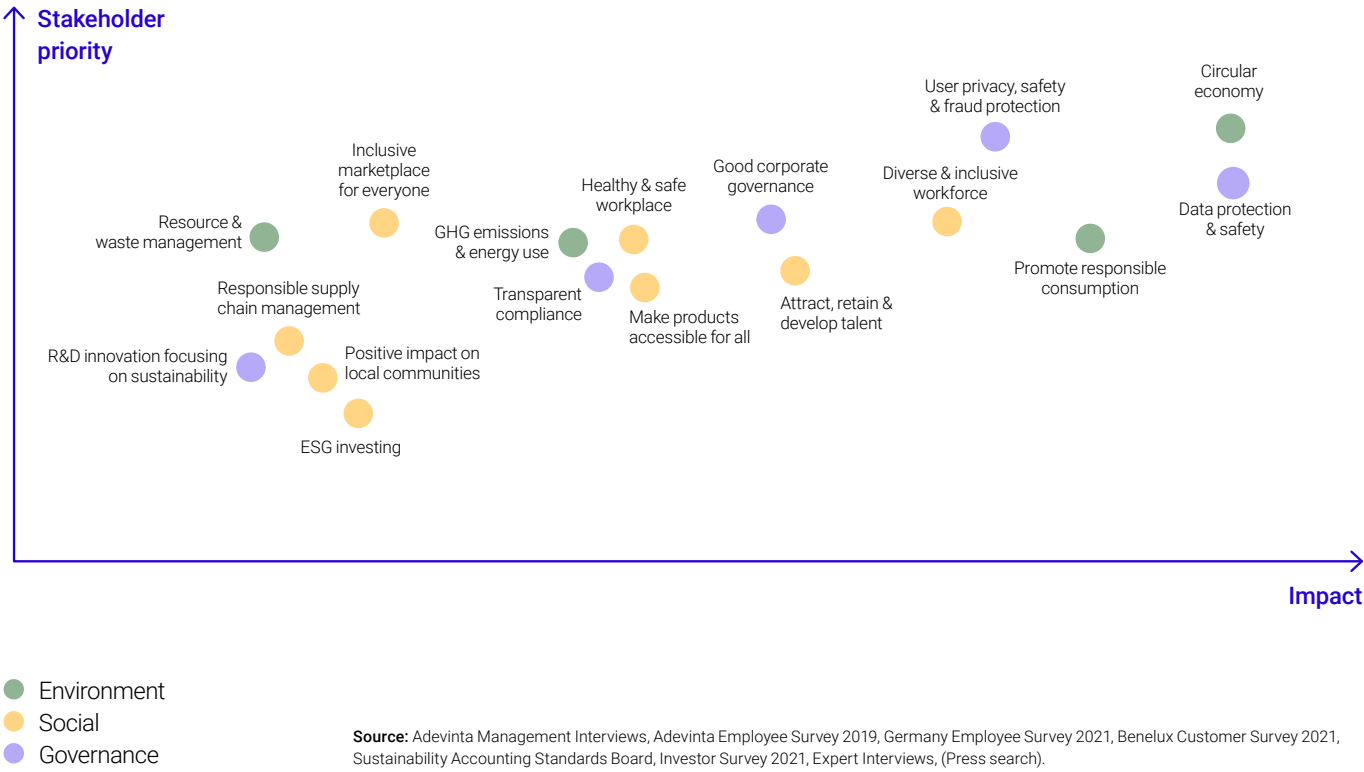
Materiality assessment

We worked with the materiality matrix below throughout 2022. We have organised Adevinta’s material issues against a horizontal x-axis (representing impact on our business) and a vertical y-axis (representing importance to stakeholders). Those issues on the top right corner of the materiality map represent the issues of highest significance to both Adevinta and its stakeholders.

Our analysis of materiality has grown out of work over several years. A key revision was in 2021, following the completion of our acquisition of eBay Classifieds Group (eCG). We updated our initial materiality matrix using additional employee and management surveys conducted at two eCG businesses: eBay Kleinanzeigen and mobile.de. We also conducted new interviews with investors and ESG analysts.

The most material new theme to emerge from this work in 2021 is the promotion of responsible consumption. Consumers are key to driving sustainable development in our economies and Adevinta can play an important role in supporting sustainable consumption. Governments are increasingly focused on strategies for achieving this and consumers are becoming increasingly aware of the environmental and social impact of products of all kinds as they pass through their lifecycle phases. The promotion of responsible consumption is therefore a component of Adevinta’s sustainability roadmap going forward.

Adevinta ESG Materiality Matrix



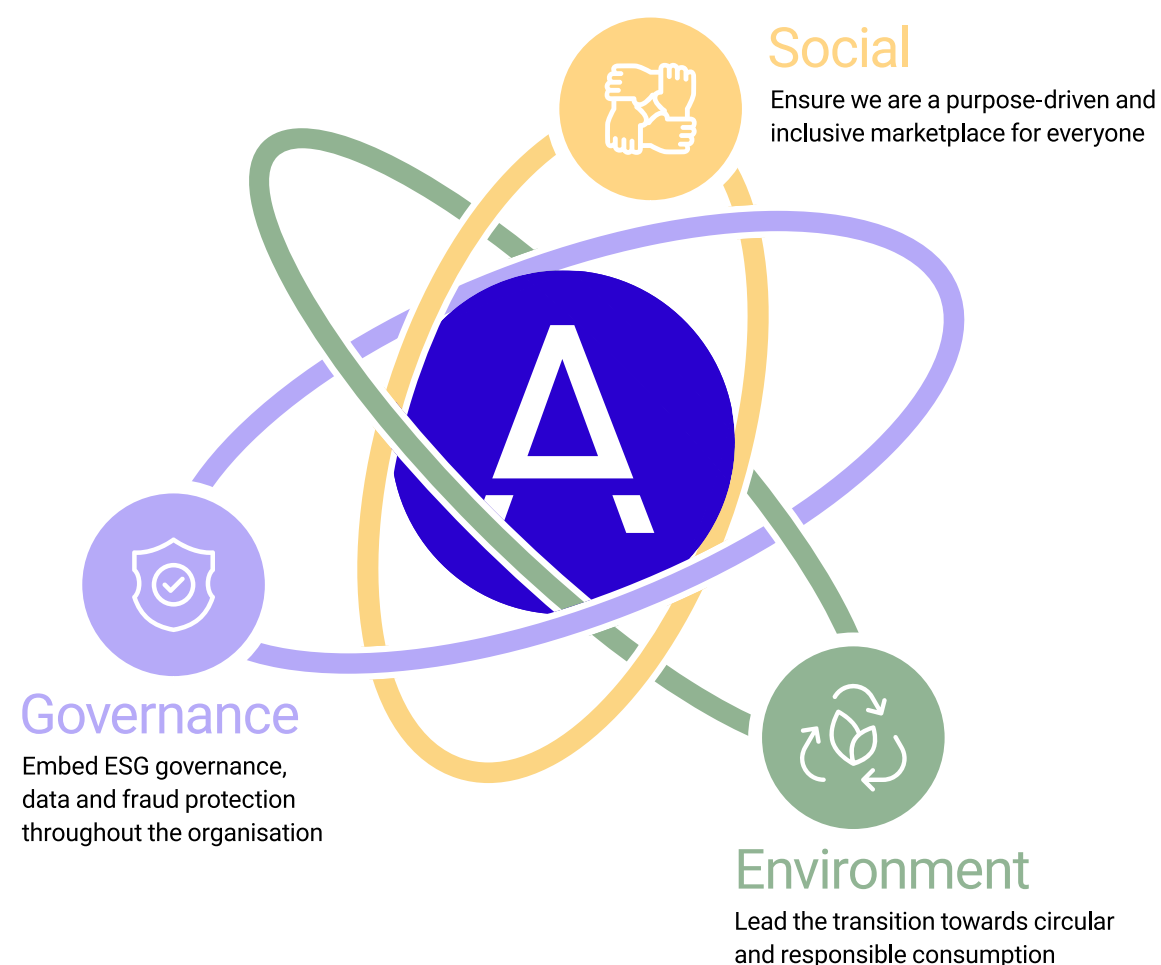
Stakeholder involvement

Whom did we engage with?	How did we engage with them?	What is most important to them?
Users	User surveys Market research Social media	• Circular economy • Make products accessible for all • User privacy, safety & fraud protection • Data protection & safety
Employees	Interviews Employee surveys	• GHG emissions & energy use • Resource & waste management • Responsible supply chain management • Inclusive marketplace for everyone • Circular economy • Attract, retain & develop talent • R&D innovation focusing on sustainability • Data Protection and Security
Management	Interviews Surveys	• Circular economy • Data protection & safety • User privacy, safety & fraud protection • Promote responsible consumption • Attract, retain & develop talent • Diverse & inclusive workforce • Good corporate governance
Investors and ESG analysts	Interviews Surveys Enquiries analysis	• Good corporate governance • GHG emissions & energy use • Data protection & safety • User privacy, safety & fraud protection • Diverse & inclusive workforce • Attract, retain & develop talent • Healthy & safe workplace
European legislators	Desktop analysis	• Sustainable investments and ownership • User privacy, safety & fraud protection • Fair business practices

The strategy

Adevinta is acutely aware of its ability to contribute to the circular economy and of our platforms to connect people in the communities and countries in which we operate. Our business implicitly encourages more sustainable consumption. Moreover, our strategic focus on our five core markets of Germany, France, Spain, Benelux and Italy allows us to describe Adevinta as a European circular economy champion. We are committed to building on our sustainability achievements, with a focus on three key areas.

Our three key themes are:



Highlights from 2022



Environment

- **GHG emissions accounting and reduction:**
 - Internalised the process of GHG calculation to drive more ownership and better understanding of our environmental impacts
 - Established a GHG data collection and harmonisation protocol and created a GHG calculation tool
- **Offset our 2021 GHG emissions by purchasing 4,710 Gold Standard verified carbon credits**
- **Embedding sustainability in our products and technology:**
 - An initial greentech team received training from an external Greentech expert
 - Won the Sustainable Digital Challenge
 - Established a repository of Greentech best practices and prioritised nine of these
 - Established a Greentech core team and Greentech ambassadors
- **Issued the 2021 Second Hand Effect report**



Social

- **Piloted a purpose-driven leadership programme for our leadership community**
- **Launched new Key Behaviours in 2022 to reflect Adevinta's culture and the integration of eCG**
- **Launched employee assistance programme in July 2022**
- **Completed Adevinta Gender Audit and created three-year gender roadmap**
- **Held bi-weekly Authentic Allyship Workshops involving more than 170 employees**
- **Launched a new e-learning management system as part of our continuing shift towards self-managed learning**
- **Supported Ukraine at an Adevinta group level**



Governance

- **Defined a process to embed ESG metrics into Adevinta's main short-term incentive scheme from 2023**
- **Issued a new Code of Ethical Conduct and ran company-wide training on this**
- **Issued a new Speak Up policy**
- **Launched our Supplier Code of Conduct and complemented our existing Anti Bribery and Corruption policy with a Conflict of Interest policy and a Gifts, Hospitality and Entertainment policy**
- **Included in the Dow Jones Sustainability Index (DJSI) Europe**
- **Cyber security:**
 - Launched our new global cyber security strategy including new global cyber security policies
 - Improved our endpoint detection and protection posture to fight against malware and ransomware attacks
 - Established a new global vendor security programme
- **Data privacy:**
 - Defined new data privacy strategy
 - Created a data privacy leadership team and implemented a new group-wide data privacy policy
 - Implemented regular reporting to the Audit and Risk Committee

Powered by the S&P Global CSA

Adevinta listed in Dow Jones Sustainability Index

Adevinta recognised as a sustainability leader in DJSI Europe for the second consecutive year

For the second year running, Adevinta has been included and recognised as a sustainability leader in the Dow Jones Sustainability Index (DJSI) Europe. Ranking in the 96th percentile, Adevinta is one of only six companies listed in the Media & Entertainment industry group.

The Dow Jones Sustainability Index (DJSI) is a global sustainability index which benchmarks the sustainability performance of leading companies based on environmental, social and governance (ESG) performance, including forward-looking indicators. The Dow Jones Sustainability Index Europe is made up of European sustainability leaders that are identified by Standard & Poor Global through the Corporate Sustainability Assessment.

Adevinta was able to show progress in the areas of business ethics, risk management, cybersecurity processes and infrastructure as well as indirect greenhouse gas emissions reporting.

“Adevinta is proud to be recognised as a sustainability leader by DJSI Europe for the second year running. In comparison to the previous year, Adevinta has shown progress in the areas of business ethics, risk management, cybersecurity processes and infrastructure as well as indirect greenhouse gas emissions reporting.

Antoine Jouteau
CEO Adevinta



Lead the transition towards circular and responsible consumption

Measuring our carbon footprint

At Adevinata, we are committed to managing the environmental impact of our businesses and setting greenhouse gas (GHG) emissions reduction targets. In order to reach these goals, we need strong internal monitoring of – and reporting on – environmental data. In 2022, we worked on developing a comprehensive and reliable internal reporting system covering all Adevinata’s businesses.

To track the company’s environmental performance over time, we set the 2022 emissions as a baseline for setting future targets and measuring the progress in emissions reduction. This allows us to quantify the company’s emissions from all material sources, identify areas for improvement, set reduction targets and track our progress towards achieving our sustainability goals.

The baselining exercise and implementation of the reporting process comprises these steps:

1. **Identification of scope:** The first step was to identify the specific operations, activities and processes that will be included in our reporting exercise. For Adevinata, we have covered all our scope 1 and scope 2 emissions and also selected scope 3 categories such as external data centres, business travel, purchases of IT equipment and other key goods.
2. **Data collection and verification:** We collected data from all relevant sources, such as energy bills, travel itineraries and material procurement records. This data allows us to calculate GHG emissions using industry-standard emissions factors. Our team of environmental engineers thoroughly validates and verifies all data to ensure accuracy and completeness.
3. **Data analysis:** We checked and analysed the collected data to identify key sources of emissions and to establish the baseline GHG emissions for the organisation.
4. **Reporting:** We collated the results of the baselining exercise in a comprehensive report. This included the GHG emissions inventory, an analysis of the sources of emissions, and a summary of the key findings and recommendations for reducing emissions.
5. **Review:** Looking ahead to the future, we will review and update the emissions inventory annually to ensure that it remains accurate and relevant, and track progress towards reducing emissions over time.

Our reporting focuses on the four main emission sources identified:

→ **Owned and third-party data centres** – accounting for 14% of our calculated carbon footprint⁸.

As data storage and processing is a key asset in our business and a significant source of our GHG emissions, we have placed a strong emphasis on understanding and managing the environmental impact of our data centre usage. As we primarily rely on third-party, cloud-based, data-centre providers, energy consumption data is directly sent by the providers. A few of our data centres operated by third parties have transitioned to over 85% renewable energy.⁹

→ **Energy consumption in buildings** – accounting for 3% of our calculated carbon footprint⁸.

We collect energy consumption data across all our office locations. This data allows us to calculate GHG emissions using industry-standard and country-specific emissions factors.

→ **Business travel** – accounting for 4% of our calculated carbon footprint⁸.

We calculate business travel emissions by tracking the number of employees travelling, distance travelled and mode of transportation. We actively promote the use of video conferencing to minimise the need for travel.

→ **Purchased Goods & Services and Capital Goods** – accounting for 63% of our calculated carbon footprint⁸.

We have started tracking emissions from key categories like Purchased Goods & Services and Capital Goods. These emissions were not tracked historically, and hence there is significant difference in our overall GHG emissions as compared to previous reporting periods. We will expand on this coverage in future years. This will help us identify our emissions in the upstream supply chain of goods, and help us to choose more efficient and less carbon-intensive services and materials.

⁸ See the carbon footprint scope in the tables on page 41.
⁹ <https://sustainability.aboutamazon.com/environment/renewable-energy?energyType=true>

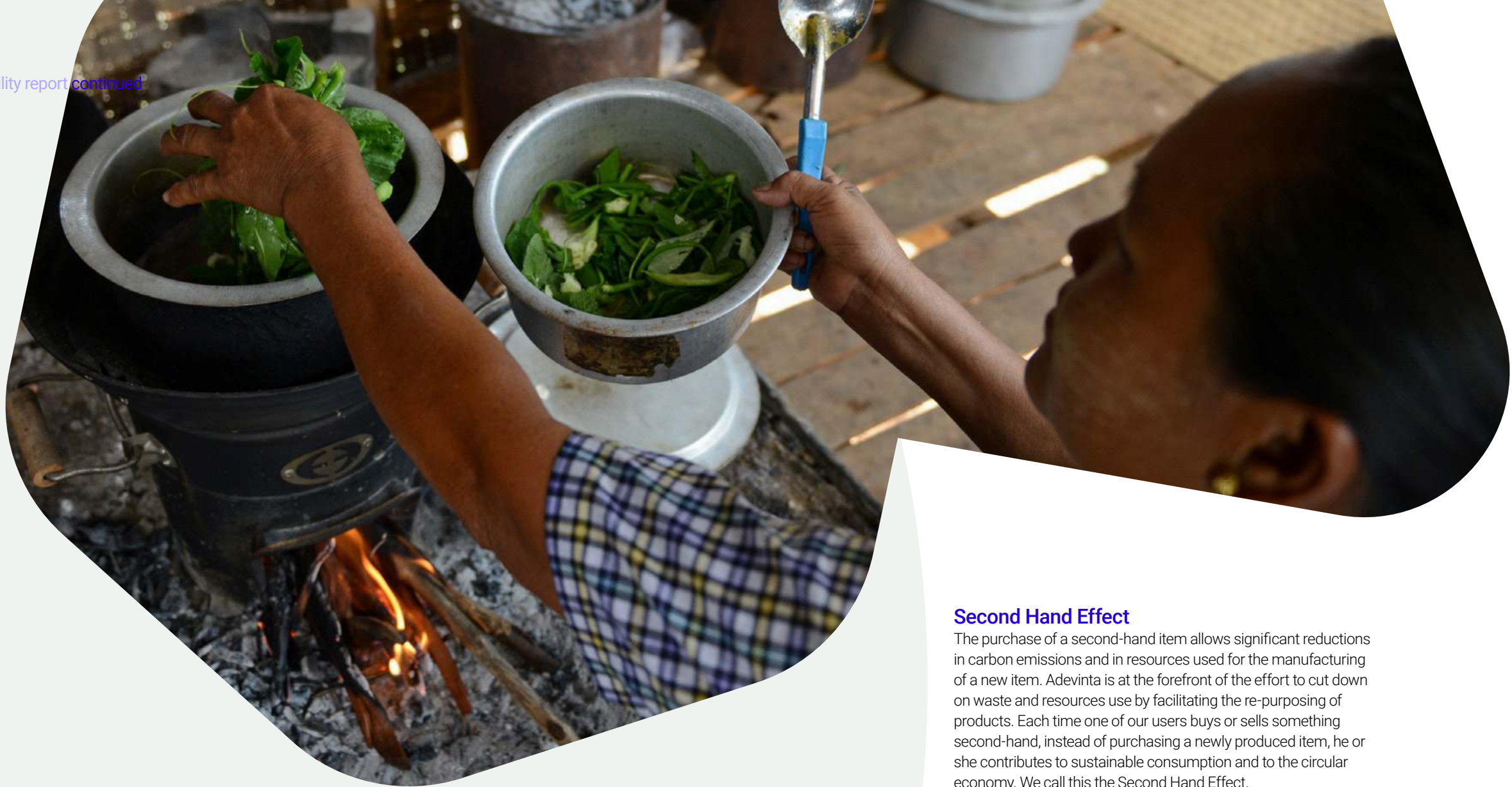
GHG emissions (Tonnes CO ₂ e)	2022	2021	2020
Scope 1 – Direct emissions			
Company-owned cars	–	1	2
Air heating	196	11	–
Scope 2 – Indirect emissions¹			
Location-based electricity + heating and cooling	1,137	1,425	2,023
Market-based electricity + heating and cooling	854	1,187	1,953
Scope 3 – Other indirect emissions⁸			
Purchased goods + services ^{1,7}	24,879	–	–
Capital goods ^{2,7}	455	–	–
Fuel + energy-related activities ^{3,7}	5,917	2,144	2,118
Energy from data centres	4,841	2,056	2,017
Transmission & distribution losses + upstream emission from fuel & electricity	1,076	88	101
Waste generated in operations ^{4,7}	71	–	–
Business travel ^{5,7}	1,753	1,129	1,036
Employee commuting ^{6,7}	5,870	–	–
Total GHG emissions	40,279	4,710	5,179

¹ Extraction, production, and transportation of goods and services purchased or acquired by Adevinata during the year.
² Extraction, production, and transportation of capital goods purchased by Adevinata during the year.
³ Extraction, production, and transportation of fuels and energy purchased or acquired by Adevinata in the year, not already accounted for in Scope 1 or Scope 2. The inclusions are upstream emissions of purchased fuels, upstream emissions of purchased electricity, transmission and distribution losses, and energy used by data centres.
⁴ Includes emissions from third-party disposal and treatment of waste generated by Adevinata.
⁵ Transportation of Adevinata’s employees for business-related activities during the year (in vehicles not owned or operated by the Adevinata). The inclusion is air, road, train and bus travel.
⁶ Transportation of employees between their homes and their worksites during the year (in vehicles not owned or operated by Adevinata).
⁷ The methodology used for calculation of emission figure for purchased goods and services, and capital goods is spend based where as for all other categories average data method is used. Also the Scope 3 categories from this reporting year are aligned with the GHG protocol.
⁸ We have significantly expanded coverage of Scope 3 emissions data in the current reporting period. Hence the emissions from this year are higher as compared to previous years.

Energy consumption within Adevinata (MWh)	2022	2021	2020
Fuel consumption from stationary combustion	1,471	59	–
Consumption of electricity, heating, cooling	15,583	5,389	6,596
of which renewable electricity	476	744	334
of which non-renewable electricity	12,833	2,956	2,896
of which heating	1,142	1,199	1,617
of which cooling	1,132	490	1,749
Total energy consumption	17,054	5,448	6,596

Energy and GHG intensity	2022	2021	2020
GHG intensity (Scope 1 and 2), tonnes CO ₂ e emissions/turnover € million ^{1,3}	0.8	1.30	3
GHG intensity (Scope 1 and 2), tonnes CO ₂ e emissions/employees ^{2,3}	0.2	0.3	0.5
GHG intensity (Scope 3), tonnes CO ₂ e emissions/turnover € million ^{1,3}	2.4	2.9	4.7
GHG intensity (Scope 3), tonnes CO ₂ e emissions/employees ^{2,3}	6.8	0.6	0.8
Energy intensity, MWh/turnover € million ¹	10.4	4.8	9.8
Energy intensity, MWh/employees ²	3.0	1.0	1.6

¹ Turnover is defined as consolidated financial operating revenues.
² Employees are based on headcount as of 31.12.2022.
³ The GHG intensity includes the total emissions based on the location-based method.



Myanmar Stoves campaign
by the Soneva Foundation

Carbon offsetting

At Adevinata, our long-term goal is to transition to renewable energy and reduce our GHG emissions. While we progress towards that intended transition, we have decided to offset all our residual emissions on an annual basis and started this practice with our 2021 GHG emissions. We understand that investing in any voluntary emissions reduction project is a temporary solution as regards minimising the environmental impact of our activities. We therefore continue to prioritise actively reducing our carbon footprint as much as possible. The objective of offsetting our emissions is to ensure our company is accountable for the emissions we are not yet able to reduce. In time, by adopting more renewable-energy and energy-efficiency measures, we expect our carbon footprint to come down, and that our dependence on offsets will reduce accordingly.

In 2022, we purchased 4,710 Gold Standard verified carbon credits, corresponding to our 2021 scope 1, scope 2 and scope 3 emissions. This Gold Standard was established in 2003 by WWF and other international non-government organisations (NGOs) to ensure projects that reduced carbon emissions featured the highest levels of environmental integrity while contributing to sustainable development. Gold Standard is the most stringent offset standard, and is preferred for high quality offset projects.

With our partner, the Soneva Foundation, we decided to invest in the Myanmar Stoves Campaign, a programme with positive environmental and social impacts. This project is the first Gold Standard certified carbon project in the country and aims at distributing fuel-efficient cook stoves for families. Deforestation is a major issue in Myanmar and part of the problem is caused by the use of firewood. The Myanmar Stoves Campaign allows families to install new fuel-efficient cook stoves with significant environmental, financial and health benefits. Each stove reduces:

- wood consumption by 50%, reducing pressure on forests and household expenditures on fuel
- indoor air pollution by 80%, improving the health and safety of the whole community
- carbon emissions by 60% per stove

By the end of 2022, the Myanmar Stoves Campaign had distributed some 49,000 stoves to around 225,000 beneficiaries.

Second Hand Effect

The purchase of a second-hand item allows significant reductions in carbon emissions and in resources used for the manufacturing of a new item. Adevinata is at the forefront of the effort to cut down on waste and resources use by facilitating the re-purposing of products. Each time one of our users buys or sells something second-hand, instead of purchasing a newly produced item, he or she contributes to sustainable consumption and to the circular economy. We call this the Second Hand Effect.

Our method for determining the Second Hand Effect is to calculate the potential savings in greenhouse gas emissions and the use of materials associated with choosing second-hand goods over new goods.

In 2021, we collected data from online marketplaces in key European markets and in Brazil: milanuncios in Spain, Subito in Italy, leboncoin in France, Jófogás in Hungary, Willhaben in Austria, Marktplaats and 2dehands/2ememain in Benelux, eBay Kleinanzeigen in Germany and OLX in Brazil.

Second-hand products can have a significant environmental impact in other phases of their life cycle (namely in the use phase), but this report focuses on the potential savings at the manufacturing stage only. We believe it is informative to visualise the volume and different types of resources that can go into manufacturing a new product, and consequently what can be saved by purchasing a second-hand item.

Calculations of potential resources and emissions savings from the purchase of second-hand products on our marketplaces in 2022 were underway in early 2023. To download the 2021 Second Hand Effect report: <https://www.adevinata.com/sustainability/second-hand-effect>

Users from our eight participating
Adevinta sites contributed to the
following potential savings:

28.2m

Tonnes of carbon
emissions (CO₂e)

9.6m

Tonnes of steel

1.53m

Tonnes of plastic

0.93m

Tonnes of aluminium

Embedding sustainability in our products and in the technology that drives our platforms

When we work on our products from a sustainability standpoint, we focus on three different aspects:

We aim to optimise the technology driving our platforms

The IT community calls this ‘greentech’, meaning the optimisation of our underlying technology (API calls, data storage, engineering architecture, etc.) to deliver a greener tech ecosystem.

We seek to create products & features to help consumers make informed decisions*

This is called ‘tech for green’ and means adding features that help our users understand their environmental impact, so they can make decisions that are better informed from a sustainability perspective.

We deliver useful eco design

We only create features that are useful to people using our marketplaces.

The world’s vast array of digital industries is thought to contribute as much as 5% of global CO₂ emissions. The concept behind leboncoin’s greentech initiative to enhance digital sustainability is that Adevin’s marketplaces process a significant volume of data. The third-party data centres that hold this information consume energy and this has an inevitable environmental impact, forming part of Adevin’s indirect carbon footprint.

A team in leboncoin’s tech community kick-started the greentech journey in 2021, starting with training provided by an external expert to a team of 12 people. In the first half of 2022, the growing greentech team participated in the Sustainable Digital Challenge, a well-known competition that teaches sustainable IT design, architecture and code. Participants work with mentors and experts to learn the techniques of ‘eco-responsible digital’ and how to make IT services more sustainable. The entry from leboncoin won the Sustainable Digital Challenge’s Gold Prize. One project that contributed to this success was the migration of leboncoin’s data cluster to servers using Graviton 2 technology, which consumes less energy. Another project implemented back-end cleaning supported by feature toggles, which saved energy by displaying adverts more efficiently.

During the second half of 2022, a core engineering team within leboncoin’s greentech community created a repository of its own best practices and prioritised nine of these for wider adoption. Internal workshops promoted the topic and up to 100 leboncoin product and engineering employees joined this initiative. A core greentech team was put together along with ambassadors from internal engineering categories.

The leboncoin greentech initiative is a grassroots movement that is helping participants understand how they can play their part in delivering a positive environmental impact. Many employees at leboncoin joined the company for its eco-responsible commitment, and the opportunity to support our own greentech journey aims to enhance this sense of purpose.

The leboncoin team plans to expand its greentech community to include more product and engineering employees and to identify and integrate tools that will allow for more accurate measurement of the impact of their optimisation efforts.

In 2023, we are planning to work with Adevin’s IT leadership to create a group-wide greentech strategy and scale leboncoin’s greentech efforts at a group level.

* In 2022, owing to reorganisation of our Product and Technology team, we postponed our work on ‘tech for green’ but made a good start on this area early in 2023.





Ensure we are a purpose-driven and inclusive marketplace for everyone

We made excellent progress in 2022 in bringing the two organisations of Adevinata and eBay Classifieds Group (eCG) together to create an integrated company. In addition to this work, we continued with other important programmes including the launch of a revised set of Key Behaviours and enhancement of signature development initiatives such as Women in Leadership along with our Early Careers Programme. We also launched a brand new e-learning management system and piloted a purpose-driven leadership programme. From a diversity perspective, a learning perspective and in terms of how we communicate within our organisation, we significantly strengthened our culture of transparency and inclusiveness.

Combining our brands and businesses

As we progressed the integration of the two businesses, and with the aid of our talented employees, we have ensured a smooth integration of our combined brands and markets. In the first half of the year, there was comprehensive work on internal policies, processes and systems and, as 2022 progressed, our focus turned to merging our organisation at the cultural level to deliver one unified team. We re-emphasised how we can collectively create new opportunities for our company, our customers, our users and our employees while reinforcing our people-centric culture of trust.

We took care to look at the merits of both Adevinata and eCG so that we defined a way forward that was built on our mutual strengths. We believe this was the right approach and we closed the year with a united organisation with an engagement rate of 69%. Our company culture, especially the way we regularly engage with our employee base, ensured we were able to cope well with this very dynamic phase of our development.

As teams were able to return to working in close proximity with the worst phases of the Covid pandemic behind us, we arranged more workshops and events to reacquaint team members and further integrate our new starters across 2022. This has played an important role in uniting employees as we continue to integrate the operations of Adevinata with eCG.

Adevinta Key Behaviours

As part of the integration workstream, we launched a new set of Key Behaviours. These are cornerstones of Adevinata's culture, which is built on a commitment to engagement with our people and on encouraging all employees to have a voice and to

contribute. Our new Key Behaviours are the result of careful focus group discussions, consultation from experts and the guidance of Adevinata's executive leadership team. They reflect our growing Adevinata employee base, our evolving Growing at Scale strategy and the qualities our employees believe will support our long-term success.

- **Act for max impact**
Keeping the longer-term in mind results in better products for our communities.
- **Grow through different perspectives**
We approach situations with curiosity and humility.
- **Use your voice**
We want to foster an environment where everyone can speak freely and respectfully.
- **Win and lose together**
We have big ambitions and achieving them isn't a solo mission.
- **Experiment bravely**
Taking risks can be uncomfortable, but when we choose to experiment bravely, we have the chance to deliver the best solutions for our customers.

Giving our people a voice is even more relevant in the face of changes arising from Adevinata's acquisition of eCG and the implementation of our Growing at Scale strategy. Our aim is to design changes in partnership with our people, to consult them and inform them so that everybody feels included, and to avoid simply imposing change that is not well understood. This approach will be vital in the context of Adevinata's intention to verticalise its marketplaces as announced at the end of 2022. Our aim is to simplify our organisation in line with our growth strategy, centred around our Motors and Real Estate verticals as well as Re-Commerce. We will encourage our teams to own this important transition and to be an active part of this next phase of change at Adevinata.

Employees by Age

Age group	Female		Male		No data		Total	
	%	#	%	#	%	#	%	#
20 and under	0%	2	0%	3	1%	48	1%	53
21 - 30	10%	556	12%	701	0%	2	22%	1,259
31 - 40	19%	1,073	29%	1,638	0%	1	47%	2,712
41 - 50	10%	560	15%	849	–	–	25%	1,409
51 - 60	2%	123	3%	166	–	–	5%	289
61 - 64	0%	10	0%	10	–	–	0%	20
65 and over	0%	3	0%	1	–	–	0%	4
Total	40%	2,327	59%	3,368	1%	51	100%	5,746

Employees by Gender and Country

Country	Female		Male		No data		Total	
	%	#	%	#	%	#	%	#
Australia	32%	49	68%	102	–	–	100%	151
Belarus	58%	87	36%	53	6%	9	100%	149
Belgium	60%	6	40%	4			100%	10
Canada	32%	65	67%	137	1%	2	100%	204
China	50%	8	50%	8	–	–	100%	16
France	44%	676	56%	864	–	–	100%	1,540
Germany	36%	315	64%	564	0%	1	100%	880
Hungary	39%	47	50%	60	11%	13	100%	120
Italy	41%	127	55%	169	4%	13	100%	309
Mexico	45%	54	50%	60	6%	7	100%	121
Netherlands	31%	152	69%	335	0%	1	100%	488
Norway			100%	1			100%	1
South Africa	35%	22	60%	37	5%	3	100%	62
Spain	42%	709	57%	960	0%	2	100%	1,671
Sweden			100%	1	–	–	100%	1
United Kingdom	47%	9	53%	10	–	–	100%	19
United States of America	25%	1	75%	3	–	–	100%	4
Total	40%	2,327	59%	3,368	1%	51	100%	5,746

Employees by Gender and Contract type

Employee Type	Female		Male		No data		Total	
	%	#	%	#	%	#	%	#
Regular	46%	32	48%	33	6%	4	100%	69
Intern (Fixed Term)	40%	2,176	59%	3,255	1%	40	100%	5,471
Substitute (Fixed Term)	20%	1	80%	4	–	–	100%	5
Temporary (Fixed Term)	58%	105	38%	69	4%	7	100%	181
Trainee (Fixed Term)	67%	10	33%	5	–	–	100%	15
Work Student (Fixed Term)	60%	3	40%	2	–	–	100%	5
Total	40%	2,327	59%	3,368	1%	51	100%	5,746

“We bring an inclusive lens to everything we do and want our employees to be valued for their differences.

Engagement survey

Our annual engagement survey revealed a number of good results around the relationship between personal goals and company goals, performance feedback, management concern for individual well-being, our diversity stance, and adoption of our Key Behaviours, although the overall engagement score was 1% down on last year (69% versus 70%). The survey showed that 88% of respondents agreed they ‘know how their goals contribute to the goals of the company’, 84% agreed ‘my manager gives me useful feedback on how well I am performing’, and 88% agreed ‘my manager genuinely cares about my well-being’.

On diversity, 86% agreed with the statement ‘people from all backgrounds have equal opportunities to succeed at my company’, 83% said that when they ‘speak up’ their ‘opinion is valued’ and 81% agreed ‘I feel like I belong at my company’. Our survey also showed our people are already adopting many of our Key Behaviours. Our survey showed that 75% of Adevintans believe they ‘grow through different perspectives’ and ‘consider the ideas of others’, and 76% agree they can ‘use their voice’ and that there is ‘open two-way communication’.

While the core results were encouraging, areas for improvement included the issues of ‘taking action’ and Adevinta’s ‘communication of the company’s vision’. Less than one-third of respondents agreed they had seen ‘positive changes taking place based on recent employee survey results’, and only 54% agreed the executive leadership team had ‘communicated a clear vision’. These issues are already receiving a special focus for 2023.

Purpose-driven leadership programme

In the middle of the year, we piloted a new coaching programme to help our leadership community understand what drives them and how that links to Adevinta’s Purpose, Mission and Vision. Our Purpose Driven Leadership pilot took place in Barcelona and involved 10 Adevinta leaders. With guidance including a two-day workshop and personal coaching, participants identified their leadership purpose and created a plan of how they will bring their purpose to life at Adevinta. Being a purpose-driven marketplace is a key part of the Social component of our sustainability strategy. Collectively getting our purpose right increases productivity at work and enhances our ability to meet business challenges. There will be a wider roll out of the programme in 2023 and a Purpose Driven Leadership Toolkit for leaders to take their teams through their own purpose exploration.

Adevinta Awards at IGNITE

In May, our IGNITE employee recognition and awards event brought our culture alive for people from both sides of our new organisation. Held in Spain’s Port Aventura, this gathering provided an excellent opportunity for employees to experience Adevinta as an integrated company and to meet in person for the first time since Covid.

There were 20 Adevinta Awards recognising employees across the categories of culture, sales and innovation. The awards recognising staff for their significant contributions to Adevinta’s shared company culture celebrated employees who live our Key Behaviours every day. There were awards too for outstanding sales performance by individuals, managers and teams, and for successful innovation across our marketplaces that underline Adevinta’s focus on investing in products and technology. We selected winners based on employee and peer nominations, with around 100 finalists considered in the final rounds of judging. IGNITE winners represented 14 of our marketplaces, as well as Adevinta’s global functions. It also provided opportunities for learning and development, with best practice case studies, networking and professional development sessions.

Diversity, equity and inclusion

Key to the Social component of our sustainability strategy is our aim to be an inclusive workforce, workplace and marketplace, by creating an environment where everyone feels they belong. We bring an inclusive lens to everything we do and want our employees to be valued for their differences. Diversity, equity and inclusion (DEI) are therefore important themes at Adevinta. We love our diversity – it’s what makes us stronger. We raised awareness of fundamental DEI issues throughout the year within Adevinta with the aim of differentiating our company from others in this space.

Launch of DEI Strategy

In September 2022, we launched our DEI Strategy and communicated it to the business. The strategy focuses on three key pillars:

- **Workforce:** providing equitable opportunities to all our employees
- **Workplace:** ensuring an inclusive working environment from a cultural and physical perspective
- **Marketplace:** implementing responsible, inclusive product design that takes into account the diverse needs of our pool of customers

At the same time, we did more work on global policies, DEI compliance training, communications and building leadership awareness and grassroots engagement.



Workforce
Ensuring that our people processes and structures are free of any systemic bias in order to create equitable opportunities across the employee life cycle



Workplace
Safeguarding an inclusive organisational culture and physical work environment in which everyone can thrive, contribute and feel a sense of belonging



Marketplace
Bringing an inclusive lens to everything we do to contribute to positive social impact in our marketplaces and communities and to strengthen our license to operate

The Adevinta Gender Audit

From September 2022 to the first quarter of 2023, Adevinta conducted a Gender Audit in collaboration with an external gender consultant from Gender Rise. The audit aimed to gain a full and realistic picture of Adevinta’s gender-related issues in several fields: Rewards; Talent Development; Performance, Merit and Leadership; and Culture. By the end of the process, we had built a clear roadmap for future action on this theme. The process included a full qualitative and quantitative review and analysis of data, policies and programmes, an all-employee questionnaire, one-on-one and focus group interviews, and strategic recommendations.

Authentic Allyship Workshops

After a successful pilot series, the Authentic Allyship Workshops have continued with sessions twice a month and were joined by more than 170 colleagues. In each session, participants tackled concepts such as identity, intersectionality, privilege and power, while learning how they can act as authentic allies towards

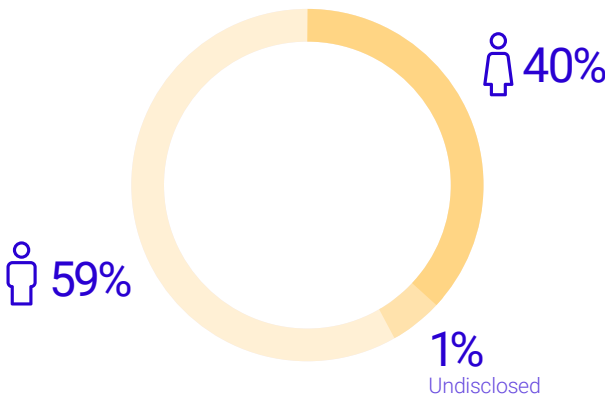
themselves and their peers who may come from underrepresented backgrounds. The workshops led to the creation of a strong community of allies within the company, who meet virtually every six weeks to delve deeper into the topic of Allyship and other DEI-related themes such as sexism, transphobia or racism.

Women in Leadership

Our Women in Leadership Programme (WIL) remained a core component of our DEI action plan. We believe a healthy business has a diverse workforce that brings different perspectives, experiences and backgrounds to the workplace. The Women in Leadership Programme helped talented women with senior leadership ambitions develop their skills and grow their networks. In 2022, we expanded the programme by dividing it into two paths: 1) Emerging Women Leaders or EWL (for high-potential women at the mid-stages of their career); and 2) Next Women Leaders or NWL (for senior high-potential women identified for executive roles).

There were 40 EWL participants and 14 NWL participants. In September, EWL participants met in Barcelona for a two-day strategic leadership event that was a highlight of the 2022 programme. Although we will continue supporting our talented women in pursuing their professional ambitions, the programme’s goals and outcomes will be reviewed and assessed against the Gender Audit Results. This step is necessary to make sure that WIL participants are fully benefiting from the programme and that the presence of a leadership course exclusively for our female talent does not work against our pursuit of gender equity.

Our male / female ratio at year end



Management in Revenue-Generating Functions

	Female		Male		No data		Total	
	%	#	%	#	%	#	%	#
Job Level Managers								
Junior Managers	54%	57	46%	48	–	–	100%	105
Middle Managers	40%	108	59%	160	1%	2	100%	270
Top Managers	43%	9	57%	12	–	–	100%	21
Total	44%	174	56%	220	1%	2	100%	396

Women in STEM Positions

	Female		Male		No data		Total	
	%	#	%	#	%	#	%	#
Job Level Managers								
Adex			100%	1	–	–	100%	1
Junior Managers	36%	20	64%	35	–	–	100%	55
Middle Managers	25%	110	74%	324	0%	1	100%	435
Not Manager	25%	584	74%	1706	1%	17	100%	2307
Others	40%	10	60%	15	–	–	100%	25
Top Managers	14%	4	86%	25	–	–	100%	29
Total	26%	728	74%	2,106	1%	18	100%	2,852

Gender Pay Indicators

	Average female salary (€)	Average male salary (€)	Indicator	Variation between men and women
Employee Level				
Executive level (base salary)	163,349	189,535	Mean Gender Pay Gap	(21.05)%
Executive level (base salary + other cash incentives)	215,118	253,246	Median Gender Pay Gap	(24.45)%
Management level (base salary)	68,811	82,325	Mean Bonus Gap	(19.40)%
Management level (base salary + other cash incentives)	83,526	100,066	Median Bonus Gap	(23.09)%
Non Management level (base salary)	44,031	56,049		
Non Management level (base salary + other cash incentives)	52,448	66,111		

Employees by Gender and Job Level

	Female		Male		No data		Total	
	%	#	%	#	%	#	%	#
Job Level Managers								
Adex	25%	2	75%	6	–	–	100%	8
Junior Managers	55%	103	45%	85	–	–	100%	188
Middle Managers	34%	279	66%	536	0%	3	100%	818
Top Managers	34%	39	66%	75	–	–	100%	114
Total	38%	423	62%	702	0%	3	100%	1,128

Adevinta for Everyone

A cornerstone of our commitment to DEI is Adevinta for Everyone (A4E), our internal grassroots movement comprising 20+ employees from across different Adevinta locations. A4E members act as local representatives of the DEI agenda, by organising events and raising awareness in their marketplaces about DEI-related matters. In June, A4E chose Amsterdam as the venue of its first-ever conference, where members participated in an Authentic Allyship co-creation workshop, team-building activities and worked on the visual identity of A4E as a brand.

Inclusive Leadership Programme

There was also a DEI theme at our IGNITE employee recognition and awards event. Our DEI team rolled out Adevinta’s Inclusive Leadership Programme with the company’s top 140 leaders, along with our Global Product & Technology team and all the IGNITE finalists. As part of the Inclusive Leadership Programme, we have already built Neurodiversity and LGBTQIA+ networks, and continued nurturing our women in tech groups. We have also laid the groundwork for a race and ethnicity group. Our IGNITE event was also notable for its large privilege line-up activity. Privilege line-ups support team-building by helping delegates appreciate the diversity of individual backgrounds and how privileges arise from race, socio-economic class, gender and other variables. Privilege line-ups underline that everyone has a different starting point in life and that equity measures are needed to create fair opportunities for everyone. This Inclusive Leadership journey gained external recognition and we were nominated as Award Finalists for The Association of Business Psychology in London: DEI category – “Enabling organisational culture change and building a DEI movement”, where we finished second.

Smart Working

Our Smart Working Policy operated throughout the year following its initial launch in 2021. With working patterns returning to pre-Covid norms, we sought feedback from employees, job candidates and our talent acquisition teams to understand how well our Smart Working Policy meets our needs.

Smart Working is our framework for defining the moments and rituals we wish to spend together in person. It details how employees can balance individual flexibility and remote working with maintaining our culture through in-person interactions. Our Smart Working practices vary across the business, and local leadership teams determine what makes the most sense based on local contexts. There are clearly some occasions when face-to-face contact is appropriate, including onboarding new hires, final interviews, brainstorming, performance reviews, and end-of-year reviews. The clear feedback we received is that Smart Working is well suited to the needs of employees and to our business generally. It is also part of our strategy to attract talent and we have found that nearly all job applicants welcome the flexibility and empowerment to make decisions about when to work in the office and when not. We also have ‘work from anywhere weeks’ that provide employees with up to four weeks a year where they can request to work from locations they choose.

Equity plan

Adevinta introduced a Restricted Stock Unit (RSU) equity reward scheme designed for middle and senior management. The plan awards eligible staff with shares based on a percentage of their base salary. Equity grants will vest every six months over the course of three years, with the first grant being awarded to eligible colleagues on 1 April 2023 and with no performance conditions apart from continuous service. This new scheme will allow more Adevinta employees to share in our success.

Wellbeing support

Our Global Employee Assistance programme commenced in July and offers employees and their immediate family members confidential support for any wellbeing concern, from everyday matters to more serious health, emotional or financial issues. For example, it can help employees meet psychologists, assist somebody settling in a new country, provide support with stress or work issues or address relationship problems or substance abuse. This service underlines how seriously Adevinta treats personal sustainability and wellbeing. In 2022, 96 cases were supported.

Learning and development at Adevinta

We completed a range of valuable learning and development initiatives during 2022. Our programmes offer substantial career development opportunities, and we are enrolling a larger number of participants than ever before. Our training programmes are becoming more customised in order to address Adevinta’s strategic objectives and deliver the leadership skills we will need as we continue to transform our organisation.

Training data

Country	Average training hours per FTE	Number of employees trained	Total training hours
Spain	12	1,103	13,381
Central teams	7	259	1,740
France	23	695	15,829

Adevinta Academies

Our Adevinta Academies programme, which gives participants the knowledge they need to contribute to our business success, continued throughout 2022. The Product Academy provided online courses that build key product capabilities. The Machine Learning Academy helps engineers and data analysts integrate machine learning in production. The Leadership Academy helps our leaders to develop their full leadership potential and lead high-performing teams. The Sales Academy contributes to upskilling our sales teams globally. We have also introduced new academies such as the Agile Academy that teaches the importance of planning, prioritisation, collaboration and team techniques to underline how agility brings value to our business.

‘Be Your Best’

At Adevinta, we believe that as our company grows we all need to learn, develop and grow alongside it. To make this happen, we create a consistent, performance-driven culture that allows every employee to see how they contribute to Adevinta’s overall success. We call this ‘Be Your Best’ and it identifies what our people need to do in order to be the best versions of themselves when at work. It underwrites how Adevinta sets goals for employees and how we conduct career development conversations throughout the year. We do this with a focus on transparency in development opportunities and by building awareness, commitment and a learning mindset to support overall development.

Adevinta Avenues

This global career framework identifies core competencies and behaviours Adevinta requires to succeed. Adevinta Avenues is helping us build a competitive employer brand by allowing employees to plan their growth within Adevinta and by providing the framework for annual career development conversations as well as compensation and benefits packages. This ensures that we have the right employees with the right skills as Adevinta develops. The issue of career development is always top of mind for talented candidates seeking a career at Adevinta and is a cornerstone of our employee value proposition. We also use Adevinta Avenues to develop our existing strong talent.

Leadership Essentials

Our flagship offering within our Leadership Academy, the Leadership Essentials programme is for middle managers and covers the basic skills, knowledge and behaviour required to be successful. The programme added new content in 2022, and we had more than 80 participants from all of our business areas and marketplaces. The programme is now largely online and self-led.

“We believe that as our company grows we all need to learn, develop and grow alongside it.”

Participants complete a personality profile and feedback survey before creating their individual development plan. After they have spent up to four months embedding new skills and behaviour, they repeat the feedback process and receive a comparative report identifying where the candidate’s leadership impact has improved.

Learning Management System

We launched a brand new e-learning management system across Adevinta in 2022 with this global platform marking our continuing shift towards self-managed learning. We ran two compliance courses initially: Code of Ethical Conduct; and Anti-harassment and Discrimination. Part of the onboarding experience for new joiners, these courses received excellent feedback.

Early Careers Programme

Our Early Careers Programme helps junior talent – undergraduates, recent graduates or other candidates – activate their careers and develop skills for success. It also creates a pipeline of future talent to support Adevinta’s current and future talent needs, creates diversity within our teams and provides development opportunities for our current and aspiring managers.

Our Early Careers philosophy is that personal and professional development and growth motivates employees to remain with Adevinta and contribute to our long-term success. Participants work towards specific future business needs, acquiring skills and competencies to fill specific positions. In 2022, there were four tracks to the programme operating at our Tech Hubs in Barcelona, Paris, Berlin and Amsterdam, with 28 participants.

We adopt the 70/20/10 model for learning and development that suggests individuals learn 70% of their knowledge from challenging experiences and assignments, 20% from developmental relationships, and 10% from coursework and training. We combine ‘on the job learning’ mentorship programmes and learning through teaching. Regular “Meet the Business” sessions guarantee the perfect networking bridge between the business and the early career cohorts.

→ Early STARTers

This track offers opportunities to people who are still studying and want to develop their career in a multicultural environment. Initially, we offer a six-to-eight month internship.

→ Technical Specialists

These roles target junior talent with less than two years’ experience who want to become technical experts, such as software developers, data scientists or security engineers.

→ International Generalists

This track is for recent graduates and career changers who would like to try different roles across our global teams and marketplaces before deciding on how to focus their career.

→ Trainee Programme Berlin

This two-year trainee track is designed for graduates and career changers in the fields of tech, product, UX design, analytics, advertising or marketing. They rotate through different teams in our German marketplaces, mobile.de, eBay Kleinanzeigen and later in one of our Global Tech Hubs.

Performance by Type*

	No		Yes		Total	
	%	#	%	#	%	#
Employee Type						
Regular	24%	1,317	76%	4,106	100%	5,423
Temporary (Fixed Term)	60%	104	40%	69	100%	173
Intern (Fixed Term)	78%	53	22%	15	100%	68
Trainee (Fixed Term) (Trainee)	82%	23	18%	5	100%	28
Work Student (Fixed Term)	100%	3	–	–	100%	3
Substitute (Fixed Term)	33%	1	67%	2	100%	3
Regular Remote	100%	1	–	–	100%	1
Total	26%	1,502	74%	4,197	100%	5,699

Performance by Gender*

	No		Yes		Total	
	%	#	%	#	%	#
Gender						
Female	26%	601	74%	1,724	100%	2,325
Male	26%	862	74%	2,473	100%	3,335
No data	100%	39	–	–	100%	39
Total	26%	1,502	74%	4,197	100%	5,699

Goals**

	No		Yes		Total	
	%	#	%	#	%	#
Gender						
Female	22%	502	78%	1,823	100%	2,325
Male	24%	810	76%	2,525	100%	3,335
No data	100%	39	–	–	100%	39
Total	24%	1,351	76%	4,348	100%	5,699

* This is the number and % of employees who had a performance review based on the headcount as of 30/09/2022

** This is the number and % of employees who set goals based on the headcount as of 30/09/2022

Health and well-being

Adevinta encourages a healthy work-life balance by offering flexible workdays and hours, as well as generous paid vacation and parental leave policies. In 2022, we recorded 31 work-related injuries (32 in 2021) of which four were high-consequence injuries (nine in 2021) and 419 cases of ill health (27 in 2021). As in 2021, there were no fatalities during 2022.

Employee representation

Adevinta ensures employees have full freedom of association and may organise themselves as they choose, with this right stipulated in our Principles of Corporate Responsibility. The Adevinta Employee Works Council (EWC) is an important forum for dialogue between top management and employees from all Adevinta countries. To ensure excellent working conditions and to prevent discrimination, every workplace has collective bargaining agreements or working-environment committees. By the end of 2022, 55% of our employees were covered by a collective bargaining agreement. The EWC is modelled on the European Works Council protocol and in 2022 had 16 representatives (nine men and seven women) and six observers. The EWC members meet twice annually with Adevinta's management team led by CEO Antoine Jouteau. These meetings address a broad range of issues of common interest and the EWC is also consulted on transnational matters, such as the sale of operations. The EWC was established in October 2019 after Adevinta's spin-off from Schibsted. Each country with 50 or more Adevinta employees has the right to representation on the EWC, proportional to the number of employees. EWC representatives are elected every two years by majority employee vote or by local trade unions or workers' committees. The EWC's latest election was held in January 2022.

Redundancy plan

As part of our integration with eCG, we identified some duplications in responsibilities across our organisation and this meant that around 5% of our 2022 roles would not continue. We made every effort to redeploy people where possible and were successful in finding new roles for around half of those whose earlier roles were affected. Redundancy was our last resort throughout our integration process but, where this action proved necessary, we ensured that people were treated with fairness and respect, and that they are moving onto the next stage of their careers as advocates of Adevinta.

The timeline for implementing the proposed changes varies by team and country, but the overall goal is to have all our teams fully integrated by H2 2023.

We are committed to supporting anyone whose job was impacted and we put competitive packages in place for those whose roles were discontinued as well as generous support packages from reputable outplacement services.

Brand and communications

To protect, promote and enhance Adevinta's external reputation we progressed work on building our brand, especially in new markets where Adevinta was not previously present. Our focus in 2022 was on the 'protect' elements in the form of extensive crisis preparedness work across our marketplaces. This work lays the foundation for more intensive activity in 2023, which will strengthen our reputation among corporate audiences.

We enhanced our appeal as an employer of choice through social media channels by promoting our DEI initiatives and our new set of Key Behaviours. We know that people are motivated to work for Adevinta because we have a reputation as a purpose-driven organisation with a strong sustainability narrative. In addition, prospective employees value our open culture built on our strong DEI agenda.

Our internal communications activity reflects Adevinta's philosophy of inclusiveness. We give people a range of opportunities to give their opinion, provide feedback and to help shape the organisation. This has been a particularly important requirement over the past two years as legacy employees from two organisations came together at the same time that we welcomed new members to our teams. So a key objective has been to make people feel valued and to build a strong sense of commitment and collaboration.

Other social information

Number of hires during 2022	Percentage of positions filled by internal candidates
1,719	11%
Number of terminations during 2022	Average hiring cost per hire
1,118 (voluntary or involuntary)	€4.60

Community engagement

Adevinta touches communities in all the markets in which it operates. Our employees engage in ways that matter most to local residents and stakeholders. We help coordinate and raise funds for worthy causes, support important community initiatives or simply collaborate to promote topical issues as well as help charities raise their profiles. Set out below are a few examples to showcase how our people engaged with communities in the year under review. During 2022, our marketplaces donated €406,905 to a variety of non-profit organisations, hospitals and schools, with €184,375 of this total going specifically to Ukraine.

Benelux

Our Benelux team that serves leading classifieds Marktplaats and 2dehands/2ememain – in The Netherlands and Belgium respectively – focused on the needs of Ukraine in 2022. Adevinta Benelux matched the donation made by employees each quarter to the KOLO foundation, an organisation that helps the victims of the war in Ukraine. The team also created a category on the website that allowed users to support Ukrainian citizens and refugees by offering help, donating goods or food or selling items with the proceeds benefiting Ukrainian refugees. Our platforms also offered free advertising for Giro 555 in the Netherlands, a non-governmental organisation that operates as an emergency appeals alliance in response to events such as the war in Ukraine.

A further initiative in Belgium offered free advertising to Canal-It-Up, a non-profit organisation fighting against the pollution of Belgian canals. This campaign achieved the required 15,000 signatures needed to ensure that the issue of deposit-return plastic bottles goes onto the agenda of the Belgian parliament. Subsequently, the Flemish parliament adopted the request and has proposed the implementation of deposit bottles in 2025 and is now waiting for countrywide approval.

Another successful initiative was Doing Good Day, where our people participated in a series of volunteering activities in Amsterdam and Belgium. Some 200 employees supported 10 different community centres for a day with activities such as painting, repairs or social visits. Our team was supported by NL Cares, a Dutch non-profit organisation based in Amsterdam.

Germany

In Germany, our teams from our eBay Kleinanzeigen and mobile.de marketplaces organised 'social Fridays' in Berlin for the Bahnhofsmission social assistance network, which operates out

of railway stations across the country. Every Friday afternoon, different teams go to the Bahnhofsmission in the Zoologischer Garten station in Berlin, where they provide a range of assistance from food or clothes distribution, kitchen duties or just manning the front desk. In 2022, Adevinta employees contributed more than 370 hours of voluntary work. Other initiatives saw our people help newly arrived refugees from Ukraine by handing out amenity kits at key arrival points such as train or bus stations in Berlin as well as participating in the global Time for Climate Action Campaign for Earth Day by setting up a micro page for our users. Through prominent advertising placements, we contributed to 60% of the traffic generated by the climate action campaign. We also donated 5,000 euros to re-naturalise moorland near Berlin.

At eBay Kleinanzeigen, our team donated money that helped to open the first Kinderakademie in Berlin, a children's academy for youngsters aged eight to 12. Launched to coincide with World Children's Day, the academy helps children learn about issues not typically taught in schools, for example social topics such as poverty, homelessness or migration. eBay Kleinanzeigen also participated in voluntary work for refugees from the war in Ukraine and ran prominent advertising calling for donations. In another initiative supporting World Cleanup Day 2022, our employees were given time off work to gather litter and waste from beaches, rivers, forests and streets. This was the third consecutive year that the company has participated. For each litter bag collected, eBay Kleinanzeigen funded the removal through the Plastic Bank scheme, that builds recycling ecosystems in underdeveloped communities, of a further 10kg of plastic from the sea to help reduce plastic pollution. Employees collected nine bags of litter and waste, which translated into the removal of 90 kg of plastic from the ocean.

When eBay Kleinanzeigen won this year's innovation award at an Adevinta internal event known as Ignite, the team donated 100% of their cash prize (€5.000) to Innocence in Danger. This non-profit organisation has created a global anti-cybergrooming initiative, which protects children against all forms of violence and abuse, especially dangers that originate via the internet.

At mobile.de, the team worked with the reforestation group PLANT-MY-TREE® to create a Christmas greeting that took the form of 4,000 trees, planted in a mixed forest in Saxony-Anhalt, to the west of Berlin. The tree planting was intended as a more sustainable alternative to traditional Christmas cards and as a commitment to climate protection.

France

As one of the most visited websites in France, it makes sense for the highly visible marketplace leboncoin to actively engage with the community and participate vigorously in social, economic and other outreach projects. The acceleration and support programmes that leboncoin backs – Mon Centre-Ville a un Incroyable Commerce and Mon Centre-Bourg a un Incroyable Commerce – certainly qualify in terms of reach and impact. These nationwide initiatives seek to revitalise commercial life in the centres of cities and towns across France by encouraging local entrepreneurs.

These schemes are conducted in partnership with Auxilia (a sustainable development organisation) and Banque des Territoires (a leading regional development bank). They promote intensive contact between potential local entrepreneurs who want to start a business, key decision-makers in municipalities, owners of vacant premises and members of the local community. The aims include supporting economic recovery after the Covid crisis, uniting the local business community around the issue of sustainable businesses in urban centres, and creating events that bring together members of the public and key players in local commerce.

Since its launch in 2019, this ambitious programme has supported more than 230 trade, craft or service projects involving more than 240 local partners and 550 expert coaches. More than 60% of the entrepreneurs are women, a percentage that is double France's average gender split in this context.

Hungary

Following a successful one-off fundraising campaign in 2021, Adevin's marketplace in Hungary – Jófogás – decided that for 2022 it would identify a community project that would benefit from long-term support. The Jófogás team decided to work with Scale Impact, a non-government organisation that identifies the best partners for companies looking to do more work in local communities. Through this collaboration, Jófogás was introduced to Adománytaxi (Donation Taxi), another non-government organisation, with a similar 'matchmaking' mission to Adevin (create perfect matches on the world's most trusted marketplaces). Adománytaxi matches unused items that can be sourced from the Hungarian capital Budapest with the needs of underdeveloped areas in the countryside. A survey was conducted in 2022 to better understand the drivers of the potential donors, and Jófogás now plans to create a separate shopping location on the website that will allow NGOs to sell items and help them finance their initiatives. This feature is planned to be launched in 2023.



Italy

At the beginning of 2022, Subito partnered with the United Nations High Commissioner for Refugees (UNHCR.org) in Italy to help Ukrainian refugees, by giving the UNHCR free advertising space (with access to 2.5 million daily users) to boost fundraising initiatives. The funds raised allowed UNHCR Italy to buy clothes and blankets for the refugees.

In June 2022, we ran a special campaign called "All we need is pre-loved", with the aim of educating Italians about the social and environmental benefits of the second-hand economy. In this connection, we sought the help of four celebrities, who sold personal items on our platform. The proceeds from these sales were donated to Fondazione Il Sicomoro, an organisation based in Milan that engages with the issue of young people dropping out of school. Fondazione Il Sicomoro used the funds to offer an innovative music workshop to their students.

In July 2022, our Subito team organised two days of decorating, gardening and landscaping at L'Officina dei Giovani, a new recreational centre in the heart of Milan. Under the guidance of the non-profit l'amico Charly association (a community organisation that supports young people who have attempted suicide) this facility was created to provide space for leisure and study.

Spain

In recognition of International Women's Day, our team in Spain joined the #BreakTheBias challenge. The #BreakTheBias movement aims to encourage people to call out gender bias, and holds us all accountable for our own thoughts and actions. Other initiatives included a labour-insertion programme that helps job seekers find productive employment or self-employment, and makes donations to a charity helping women who suffer gender violence.

Adevinta also joined BcnFem Tech, an initiative promoted by Barcelona City Council, Barcelona Activa and the Fundació Formació i Treball in alliance with Factoria F5. The aim of BcnFem Tech is to train vulnerable women in programming languages and web development. Adevin awarded scholarships to 21 female coder students in the 2022 programme. These grants were given regardless of whether or not the students were likely to be hired by Adevin, an approach that kept to BcnFem Tech's main objective, which is to promote employability in the market generally, and to combat the digital gender divide in Barcelona.

There were many initiatives in favour of Ukrainians suffering from Russia's invasion. A good example is a donation of €8,448 to the Educo Foundation's Psychosocial Aid programme for more than

2,000 children in Ukraine and Moldova. There was a further donation of €18,835 to the global Red Cross fundraising campaign for Ukraine. Fotocasa, Spain's leading property portal, launched a fundraiser together with the United Nations High Commissioner for Refugees (UNHCR.org) to buy winter blankets and heaters for Ukrainians. Fotocasa also helped to find housing in Spain for Ukrainian refugees.

Other donations include €4,200 for the 'Dreams' project organised by the Port Aventura Foundation. This initiative provides for a free-of-charge six-day stay that offers a unique and fulfilling experience for children and young people suffering from serious illnesses. There was also a Christmas programme to help the Juegaterapia Foundation by providing gifts to 171 children with cancer in different hospitals across Spain. In a further fundraising initiative, the sum of €29,000 was raised for the Technological Women project, promoted by the Federation of Young Women, that offers digital skills training.



Embed ESG governance, data and fraud protection throughout the organisation

Our sustainability governance

The Chief Executive Officer (CEO) has the overall responsibility for Adevinta’s sustainability strategy. The Chief Financial Officer (CFO) is responsible for the operational performance and reports to the executive management team and Board at least once a year. The sustainability statement is an integral part of the Board of Directors’ report.

Linking ESG metrics into Adevinta’s bonus system

Sustainability is a core element of our strategy and how we execute and deliver products and services to our customers and users. Therefore, including it in the way we incentivise our teams is essential. To this end , the Sustainability team and the Compensation and Benefits team worked together during 2022 to determine an appropriate basis for embedding ESG metrics into Adevinta’s main short-term incentive scheme. After discussions to identify the most relevant metrics, we decided to link the incentive scheme to qualitative metrics related to greenhouse gas baseline setting. As we only recently started our baselining exercise that will allow us to set our GHG emission reduction targets later, we do not yet have quantitative metrics. Therefore, this is a first step in our longer-term plan to link ESG with quantitative parameters. The benefit of adopting an initial scheme with only a qualitative measure is that we can immediately drive employee focus and involvement.

Sustainability policies

We want to become known as a company that not only helps everything and everyone find a new purpose, but also does this with integrity, fairness and with the highest possible standards of ethical business conduct. During 2022, we updated and enhanced a number of key group policies, including the Code of Ethical Conduct and the Speak Up policy, to increase awareness and usability, making it easier for people to understand.

All policy documents, including the Code of Ethical Conduct, are available to all our employees via the Adevinta intranet, with some of them published on our corporate external website.

With the integration of the eBay Classifieds Group marketplaces, we identified the need to provide one set of business ethics and compliance principles to which all employees across markets could refer. For this purpose, and as mentioned before, 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:

Adevinta Code of Ethical Conduct



Protection

Adevinta is an organisation rich with information, data and assets. Each of us has a responsibility to protect what we have in order to achieve our mission and thrive in the market.

This section of the code focuses on:

- Safeguarding company assets and information
- Correct use of company assets and networks
- Data privacy
- Protecting non-public information



Integrity

We believe it is not just what we achieve that matters, it is also about how we achieve it. Acting with integrity across all our business activities means complying with the law, communicating transparently, competing fairly and succeeding honestly.

This section of the code focuses on:

- Maintaining accurate records and information
- Procurement and suppliers
- Anti-bribery and corruption
- Conflicts of interest
- Gifts, hospitality and entertainment
- Fair competition
- Lobbying
- Social media and communications
- Money laundering and financing terrorism
- Sale or promotion of unlawful goods and services



Respect

We want Adevinta to be a great organisation to work for. Central to this is treating each other, and the planet, with dignity and respect.

This section of the code focuses on:

- Human rights and the workplace environment
- Respecting the planet

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. The training was available in English, French, Spanish, German and Italian and resulted in a 90% completion rate among employees. During 2023, this e-learning will be incorporated into the onboarding journey for all new employees.

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 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. In 2023, we will undertake additional work to ensure that this policy is fully aligned to the requirements of the EU Whistleblower Directive.

In 2022, nine Speak Up cases were logged:

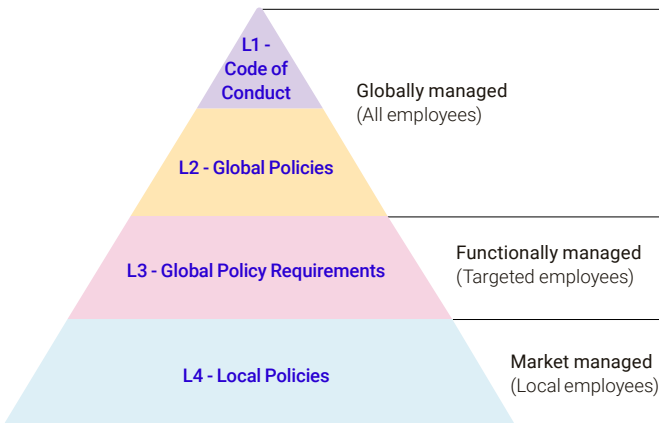
- three are closed as they were not substantiated (the initial review process was completed and the conclusion was that there were not sufficient grounds for investigation)
- three were under investigation as at year end
- two are potentially substantiated (although the initial review process had not yet been finalised as at year end)
- one is potentially unsubstantiated (although the initial review process had not yet been finalised as at year end)

To complement the Enterprise Risk Management (ERM) framework (refer to Risk Section in the Board of Directors' report) and to better respond to and address significant changes to the global risk and regulatory landscape, during the second half of 2022 Adevinta worked on a Regulatory Compliance framework that was approved by the Audit and Risk Committee in December 2022. This document aims to provide clarity over the end-to-end regulatory compliance process and identifies the key steps required to drive a consistent and thorough approach to ethics and compliance across the company. To improve governance and to drive consistency and accountability in regulatory compliance across Adevinta, regulatory domains have been assigned to named owners within the organisation. Over the coming year, we will continue to work with regulatory domain owners to drive the implementation of this framework.

The Regulatory Compliance framework includes a Policy Governance Framework to ensure that company policies are managed in an efficient and consistent way. It establishes a policy hierarchy with the Adevinta Code of Ethical Conduct as an overarching policy, and accompanying global and local policies,

which contain more detailed guidelines relating to topics described in the Code and designed to address functional/market specific needs/risks. The Framework underpins our commitment to establishing a culture of regulatory compliance, guiding employee conduct and protecting the organisation, with clear definition of the roles and responsibilities to drive accountability.

The below diagram illustrates the different levels that comprise the policy hierarchy:



During 2022, we also introduced two new policies that complement the existing Anti-Bribery and Corruption policy and lift our standards for managing these topics within the organisation:

1. The **Conflict of Interest policy**, providing all employees with guidelines on how to prevent and report actual or potential conflict of interest in their relationship with the company, as well as any conflict-of-interest situation that could potentially arise with suppliers, customers or other stakeholders; and
2. the **Gifts, Hospitality and Entertainment policy**, providing all employees with guidelines on accepting and providing gifts, hospitality and entertainment.

Trust and fraud protection

Trust, safety and protection against fraud is a risk for Adevinta (due to the nature of its business) and is part of our materiality matrix that we updated in 2021. Adevinta's mission – to create perfect matches on the world's most trusted marketplaces – implicitly emphasises the importance of trust. Trust has always been a crucial element of our business model and gaining and maintaining the trust of our users and customers alike is key to the success of our marketplaces – and even more so as we accelerate our strategy to go fully transactional. We aim at all times to ensure the privacy and integrity of our users' data, provide safe user experiences and protect users against fraud.

The growth of the digital economy is creating new opportunities for fraudsters. It goes without saying that as we enhance our ecommerce tools to give customers and end users superior digital experiences, we need to strengthen our ability to identify and prevent fraud. Fraudsters continue to find new ways of bypassing safeguards and protections, and we take this issue very seriously. We know that we must continually deploy the best anti-fraud capabilities and solutions alongside appropriate financial resources so that we can ensure our platforms deliver safe transactions between legitimate users at all times.

Our marketplaces aim to provide our users with high-quality, spam-free content and leads in a safe environment. This applies to the content posted on our marketplaces, as well as the messenger functionality that allows users to communicate. A robust combination of automated and manual fraud detection, and a moderation capability, scans, detects and removes fraudulent ads or unsafe messages. Our customer support centres assist users and customers by responding to their concerns or complaints.

Building trust and safety

Adevinta's Trust and Connecting central team works to ensure that Adevinta marketplaces provide the ideal environment for entering into transactions. We believe such an environment is one in which our buyers and sellers feel confident that nothing will go wrong throughout their experience. Equally, if our buyers and sellers encounter difficulties, they need the reassurance that appropriate corrective action will provide a fast and effective remedy.

The Trust and Connecting team deliver solutions and expertise that address the issues of trust and safety. Four units, based in France, Spain, the Netherlands and Canada, deliver a broad range of services and capabilities to all our markets worldwide.

Serenity

Serenity provides customisable automatic and manual workflows to moderate content and users based on behavioural signals. It

also provides a User Interface (UI) to control the quality of moderation activities and analyse manual actions to enhance machine learning feedback loops.

Trusted User

The Trusted User consists of a set of solutions that aim to encourage good behaviour on the part of users and foster trust between them. These solutions include:

1. Full stack peer-to-peer ratings and review system to allow users to give feedback about their transaction experience. This solution is customisable by marketplaces so that they can localise their rating experiences.
2. Trusted user segmentation is a re-usable model that allows marketplaces to segment users based on their behaviour for different targeting purposes such as campaigns, verifications or even personalised experiences.
3. Trust signals highlight user behaviour and activity such as online presence, time to reply, successful transactions and more.

Our aim is to ensure that users, ads and messages are always of high quality and free of malicious intent. To achieve this, Adevinta's trust and safety solutions provide a secure environment that supports the full transaction journey. We adopt zero-tolerance of infringement of trust and safety. We aim to ensure that no user suffers as a result of malicious actors and their associated damaging activities.

We also maintain a community of trust and safety experts in our marketplaces. These experts help identify key common problems, and align the best practices, learnings and effective solutions required to solve these problems. Through continuous communication and collaboration with marketplace teams, our experts also provide advice and recommendations on how to define, measure and monitor successful outcomes in the field of trust and safety.

How we build trust

Serenity

- Account & Content Moderation to prevent harmful interaction and content from being exchanged in our marketplaces
- Auto and Manual Moderation for high accuracy and efficiency
- Platformised UI for marketplaces to build custom widgets to accommodate for local, specific use cases

Trusted User

- Trusted User Segmentation: a consumable model for marketplaces to segment good users from bad ones used for a variety of purposes
- Full Stack Customisable Solution for Peer to Peer Ratings and Reviews
- User Trust Signals to highlight user behaviour and activity: online presence, reply time, etc.

Trust and Risk Management

- Threatmetrix Behavioural Analytics and Device Fingerprinting
- Phishing Site Takedown and Risk Analysis Services

Trust and Risk Management

This capability provides device and behavioural intelligence to predict the degree of risk associated with individual users and listings, and to facilitate takedown of websites engaged in credential theft – a type of cybercrime that involves stealing a victim’s proof of identity. We use strong and proven third-party solutions such as Threatmetrix and Phishlabs. We also provide expert services such as fraud analysis and best practices to marketplaces to mitigate risks of fraud. In addition, auto moderation checks videos, text images or audio for any unwanted content. If the automatic verdict is not sufficiently precise, moderation is done manually by a fraud expert/moderator.

Data privacy

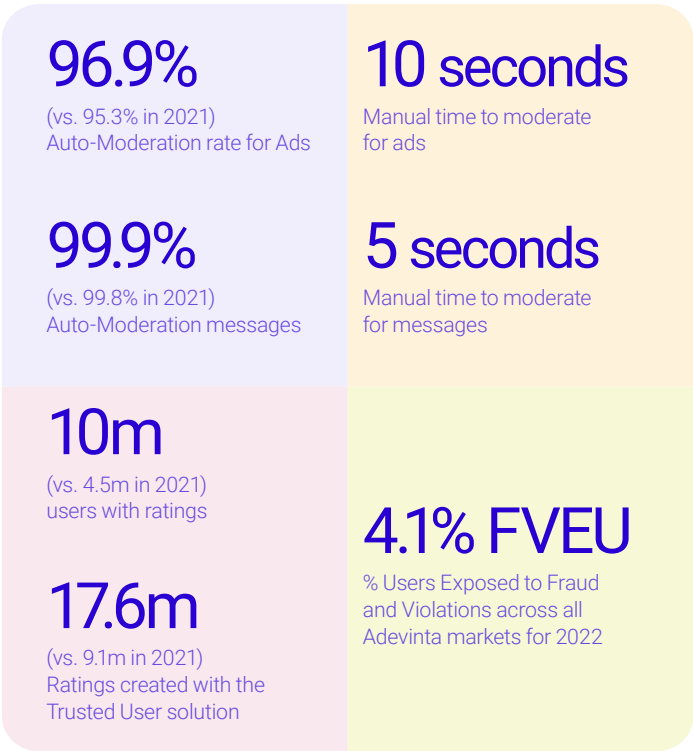
At Adevinata, we believe that everyone has a right to privacy and our mission is to continue building trust in our marketplaces by protecting and promoting individual rights to enable Adevinata’s growth. In 2022, we created a new privacy strategy that commits to developing an agile privacy-enabled organisation where data protection and privacy is part of our DNA. Our privacy programme will expand significantly over the coming years as it develops into a global framework while still addressing local market requirements.

Data privacy governance and operating model

Since Adevinata is a company in transformation, our data privacy organisation and operating model is naturally evolving too. Led by our Chief Privacy Officer (CPO), we are moving from locally led and locally managed privacy programmes to a single global privacy programme and framework.

In 2022, independent consultants completed two reviews of current practice and status across Adevinata. We defined a new global privacy strategy and related policy for Adevinata and commenced the build of the new organisation.

We formed a new Privacy leadership team that includes the group and the market teams. Led by the CPO, the team consists of data privacy officers (DPOs) and the Group Head of Privacy Operations. The CPO reports to the General Counsel. This is augmented by regular reporting to the Adevinata Audit and Risk Committee. In addition, there are regular network meetings with, for example, the Chief Information Security Officer (CISO), the Chief Product Technology Officer (CPTO), Data Governance & Data Foundations, the Head of M&A and the Head of Procurement.



In each market, the DPOs continue to drive the data privacy agenda and report into key stakeholders who, together with the business, mitigate risk and ensure compliance with local data protection laws where appropriate. We will continue to build the organisation to include a central operations team to support the group functions, in addition to local market teams.

Our Global Privacy Policy is based on the European Union’s General Data Protection Regulation (EU GDPR) and provides a set of clear, measurable data privacy requirements for the Adevinata group to follow and on which to base its privacy framework. The focus in 2023 will be to continue building on key areas of the framework to enhance and mature data privacy as per our mission.

The policy is part of Adevinata’s risk and compliance framework, spearheaded by the company’s Code of Ethical Conduct. In 2022, both the privacy policy and a new code-of-conduct training were rolled out, and employees received training in the key areas of privacy. During 2023, there will be further training initiatives in line with the strategic plan.

Privacy principles and measures

We want to ensure our customers get the most from our products and services so we must use personal data. We embrace our key privacy principles when developing our products, working with suppliers and collecting data on both our customers and employees. These principles include adequate, relevant and non-excessive collection of data, transparency and truthfulness, purpose of use, retention and deletion, and accuracy, quality and completeness.

Another key component of our privacy policy is the rights of individuals. We are open about what data we collect and why we collect it and, in our commitment to protecting data, we ensure that we respect any choices that have been made regarding the use of data. In each of our markets, we publish a clear privacy notice, and have the necessary processes and technical measures in place to ensure people can stay both informed and in control of their data when using our services. We have technical and organisational measures in place to ensure that subject access rights and data deletion requests are handled appropriately.

Our data privacy management measures include information security (see our Data privacy and protection section below for more information), third party management of personal data, international data transfers, data breach notification and risk management.

Finally, though our policy we outline the monitoring and implementation requirements of the group policy on data privacy, and we identify actions and disciplinary measures to be taken should areas of non-compliance arise, based on severity.

We will develop ongoing global monitoring of privacy as part of our privacy programme, and we will continue to build on the good practices we have in place today. As part of this, we will introduce internal KPIs/OKRs during 2023.

The independent consultants we engaged in 2022 assessed our current state of maturity, benchmarked us against our direct competitors and identified areas for improvement. We will use the findings to identify priorities for the privacy programme, which we will launch in 2023.

Data privacy and protection

To protect our data, our security teams ensure the appropriate level of security through technical and organisational measures. Through a variety of policies, the measures embed security into all of our products. In 2022, we put several new policies, processes and systems into place and these are monitored so we can identify and report on key areas of risk and compliance in both our day-to-day operational activities and through our management reporting activities. This is governed by policy and operationalised through a new process and a dedicated technical solution to support it. Incident and breach management reporting processes, and relevant technical solutions, have been updated and rolled out across the company. Specific examples and data can be found later in this annual report.

You can read more about Global cyber security on page 64 & 65.

Data privacy in numbers for 2022

Throughout 2023, our privacy programme will focus on developing a core set of global privacy KPIs. In the section below, you will find some of Adevinata’s key privacy data for 2022.

Total number of requests for customer data from government or law enforcement were- 46,810, of which 94% resulted in disclosure. These types of requests come from valid police investigations in the local markets. Where the request is not valid, the data is not disclosed.



Global cyber security

At the beginning of the year, Adevinta launched its new global cyber security strategy with the aim of ensuring the sustainability of the world's most trusted marketplaces.

We are using the internationally recognised National Institute of Standards and Technology's (NIST) cyber security framework (CSF) to ensure we can effectively identify, detect, protect against, respond to and recover from a wide range of security threats and vulnerabilities. We identified 34 tactical and strategic projects to initiate in order to ensure the confidentiality, integrity and availability of Adevinta systems and services. Key improvements in 2022 include:

- **Global cyber security policies**
We developed, socialised and approved new global cyber security policies aimed at strengthening our overall security controls posture across all marketplaces. During the year under review, we approved for adoption 16 new cyber security policies.
- **Global risk management**
We implemented a new global risk register which primarily captures and monitors the security control status of each marketplace, audit findings, any policy exceptions granted and strategic risk to be addressed. In 2022, we approved 199 new cyber security controls for adoption against an original 2022 target of 150.
- **Global endpoint detection, protection and response**
We improved our endpoint detection and response posture across multiple marketplaces. In 2022, we ensured effective endpoint protection to more than 5,000 devices.

- **Global threat intelligence**
To protect our consumers against fraud, we launched a global threat intelligence programme supporting all marketplaces. This is successfully combating fraudulent phishing sites. During the year under review, we successfully took down more than 12,000 fraudulent Adevinta-targeted websites.
- **Incident response**
We continue to improve and consolidate our global incident response posture to ensure an effective reaction to security events and incidents reported by both people and technology sources. In 2022, we investigated over 500 security events and found no evidence of any compromise. We continued to enhance our local marketplaces collaboration and knowledge transfer with this global capability into 2023.
- **Supply chain and third party risk**
We launched a global vendor security programme to ensure that all Adevinta vendors and partners meet a minimum set of security requirements that ensure the protection of employee and consumer data. In 2022, we assessed over 200 vendors.
- **Global phishing susceptibility programme**
As w is a key cyber-crime attack vector, in 2022 we expanded our phishing susceptibility assessment programme to cover all Adevinta employees and provide remedial guidance and training as required across all marketplaces. In 2022, our measured phishing susceptibility was 8.2%, compared to a global average of 15%.

- **Secure products development**
The development of secure Adevinta products and services is at the core of our work in protecting consumer data and ourselves. In 2022, we identified areas of improvement in the secure products development lifecycle.
- **Data classification, retention and management**
To ensure compliance with EU regulations and requirements, we approved new Adevinta global data classification and retention policies. We added the controls in these policies to the previously mentioned global risk register as a control requirement for all marketplaces.
- **Adevinta cyber security services catalogue**
In 2022, we developed and established a global Adevinta cyber security services catalogue. This is assisting effective delivery of the services into our marketplaces and subsequent usage.

In 2023, we will focus on expanding marketplace co-creation, collaboration and uniformity further unlocking security talent both locally and globally. Additionally, we will progress the maturity where needed, cyber security spend, solutions optimisation as well as quality cybersecurity service delivery and marketplace consumption.

Sustainable investment and ownership

Adevinta's guiding Principles for Expansion and Growth define the process regarding identification and execution of external growth initiatives. They also provide guidance on legal and sustainability elements to be considered in assessing country specific risks as a basis for market entry, or when acquiring companies in existing markets. The importance of country-specific risk from a legal and sustainability risk perspective is weighed against other criteria. This allows Adevinta to make informed decisions based on an overall risk and opportunity perspective. This serves the best interests of our shareholders, users and customers, employees and other relevant stakeholders such as regulators, lenders and investors, and the wider society.

Adevinta Ventures

Adevinta Ventures is one of the ways the Group drives innovation across the company. This team looks for compelling early-stage business models that could shape the future of marketplaces. It makes minority investments in a diverse range of promising start-ups led by credible founders and management teams, with the aim of helping the start-ups grow and scale. This provides a valuable opportunity for Adevinta to learn more about the merits of potential innovations in the sector in which it operates. Adevinta Ventures' aim is to identify new and disruptive technologies or approaches, and to plant seeds for the future of the Group.

Adevinta Ventures invests in business models within its core verticals such as Mobility, Real Estate and Re-Commerce where it believes it can create learnings and value for Adevinta, and add value to the portfolio companies. Adevinta Ventures also monitors market segments that are currently not core to Adevinta's operations. A good example is fintech, meaning technologies that support or enable modern banking and financial services operations. It also carefully analyses other marketplace enablers powered by innovative technologies such as blockchain or machine learning. Last but not least, Adevinta Ventures looks at teams and models with a strong sustainability component that aligns with Adevinta's ethos of providing consumers with more sustainable and cost-efficient ways to access products.

In 2022, Adevinta Ventures made three new investments in the Mobility space in a move that expanded the portfolio to 12 companies and funds. The new investments were:

- **2trde:** a European B2B trading platform for used-cars based on an auctions system
- **Spotawheel:** a full-stack, used-cars e-commerce platform reinventing the entire process of buying and selling cars and unlocking cross-border trade in Europe
- **Maniv Mobility:** a venture capital fund investing in early-stage Mobility companies

Incidents and breaches 2022

Information security breaches or other cybersecurity incidents

1
related to one of our third party vendor's that affected Personally Identifiable Information (PII) data for +/- 500 employees

Total amount of fines/penalties paid in relation to information security breaches or other cybersecurity incidents

0

1
related to endpoint protection

Total number of data breaches

0

Definitions:
Cybersecurity incident: A cybersecurity event that has been determined to have an adverse impact on Adevinta systems, people, data or resources prompting the need for response and recovery.
Data breach: The loss of control, compromise, unauthorised disclosure, unauthorised acquisition, or any similar occurrence where: a person other than an authorised user accesses or potentially accesses personally identifiable information; or an authorised user accesses personally identifiable information for other than an authorised purpose.

The Adevinta Ventures team fosters the sharing of learning by inviting portfolio companies to join vertical gatherings and other events, as well as to meet relevant business leaders in a group or one-on-one format. The aim of this activity is to exchange knowledge about a target sector and associated technology models, and to explore potential collaboration opportunities. Adevinta Ventures also publishes expert reports on new trends in B2B Marketplaces. In 2022, Adevinta Ventures initiated three live partnerships between portfolio start-ups and existing Adevinta marketplaces:

- **Fotocasa and Lovys:** Fotocasa offered for the first time a fully digital and integrated insurance solution powered by Lovys, the French digital insurance provider. The solution consists of two products: i) home insurance and ii) rent guarantee insurance for landlords.
- **willhaben and 2trde:** willhaben started a pilot with 2trde to offer their dealers in Austria a new way to source and sell cars across borders. This allows willhaben dealers to access German cars offered by 2trde on a B2B basis and to make bids and then complete a purchase online using the 2trde platform. At year end, a further stage of this partnership was under evaluation that would enable Austrian dealers to sell their cars in the B2B channel using the 2trde white label platform, so that other dealers from willhaben and eventually any other Adevinta marketplace, could buy them on a priority basis.
- **Coches.net and Bipi:** Our used-car marketplace Coches.net tested the subscriptions/renting category in partnership with Bipi, the Spanish car subscription service. This was a growing category within Coches.net in 2022 and this marketplace continues to collaborate with Bipi.

Due diligence procedures

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. Any red flags identified from such a due diligence process are clearly identified and raised to the Merger & Acquisition deal team and escalated to the Adevinta Investment Committee and/or Board of Directors when necessary.

Sustainable supply chain

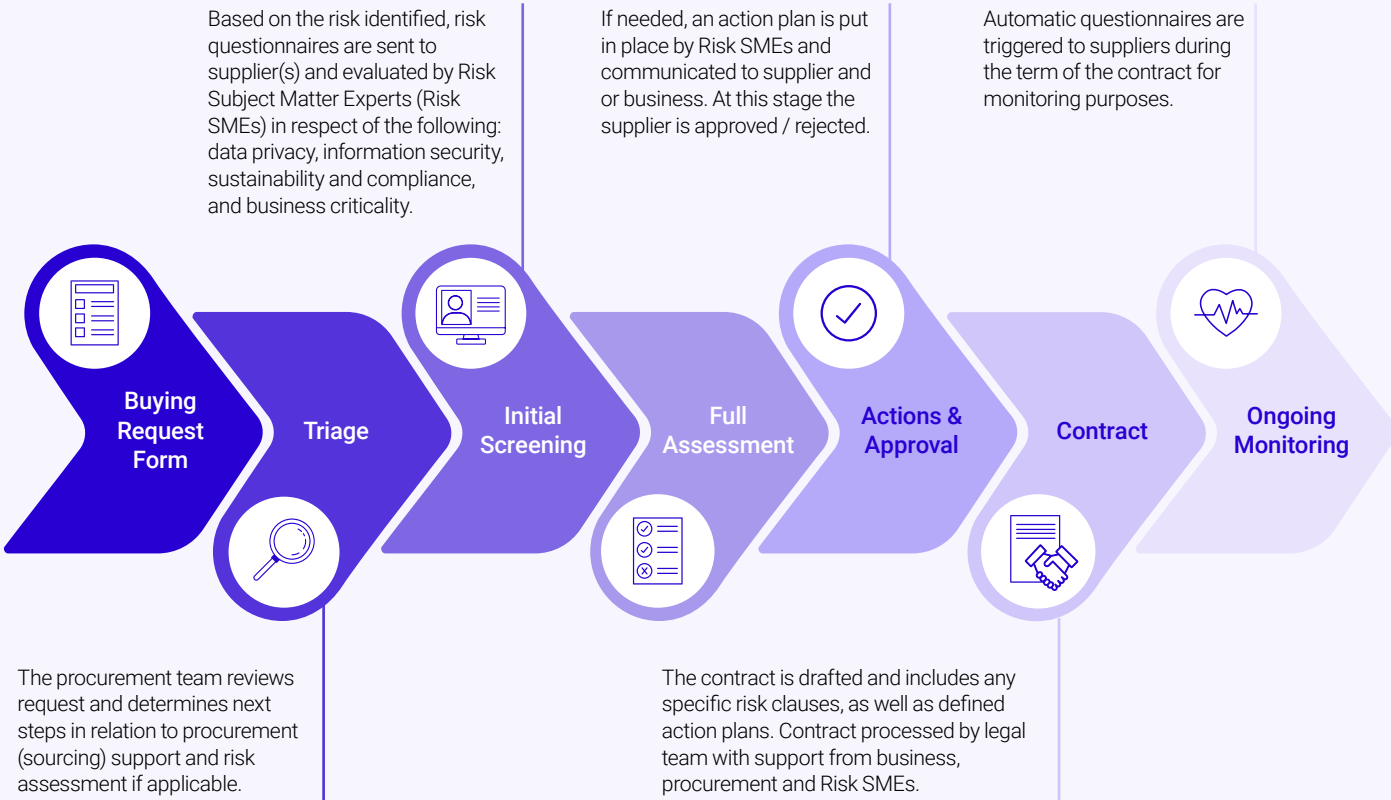
Adevinta clearly recognises its responsibility regarding its supply chain. Given that our business is to run online marketplaces, the bulk of our procurement activity comprises the provision of services, such as IT and professional services; only a smaller part relates to physical products such as ICT equipment and office supplies. In 2022, and to complement the Global Procurement

policy, we launched a Supplier Code of Conduct policy and a Sustainable Sourcing policy. These documents define the environmental, social and ethical standards that must be met by suppliers seeking a business relationship with Adevinta.

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 have incorporated a risk-based approach that includes assessments of the supplier from different perspectives:

- **Sustainability and Compliance Risk Assessment:** through the suppliers’ taxonomy and the sustainability and compliance checks (including a country-risk assessment) in the Buying Request Form (BRF) completed by purchase requestors, we aim to identify any suppliers that fall under the categories considered as higher risk from a sustainability or compliance perspective in the industry in which we operate. Any supplier identified under these criteria needs to complete a more comprehensive risk and compliance questionnaire that will be assessed before a final decision is made about contracting the supplier. We have also contracted third-party providers to perform screening based on external data sources that make checks on sanctions, PEPs (politically exposed persons) and adverse media.
- **Data Privacy Risk Assessment:** Data Privacy is about respecting individuals – and their rights – when Adevinta uses their personal data, as well as safeguarding and protecting the rights of users in relation to the processing of their personal data. For this reason, and in the context of the use of personal data, we carry out a Privacy Risk Assessment process with the aim of analysing and quantifying the risks to privacy associated with the processing of personal data.
- **Vendor Information Security Risk Assessment:** depending on the type of product/service being purchased and the type of data that is being processed by the vendor, the vendor could pose a cybersecurity risk to the organisation. To evaluate the risk, a Vendor Security Risk Assessment to determine the vendor’s cybersecurity maturity is performed by the Information Security team.
- **Business Criticality Risk Assessment:** certain suppliers and/or products are considered key to Adevinta’s operations or revenue streams, such as payment systems, programmatic suppliers or SSPs. In these cases, when entering into a contract with the supplier, a business continuity plan needs to be put in place to ensure that operations, personnel, and assets are protected and are able to function properly in the event of a threat or disaster, therefore minimising the impact to Adevinta’s operations and revenue. We conduct our business continuity planning on the basis of a Business Criticality Risk Assessment.

End-to-end Supplier Risk Assessment Process



This risk-based approach underlines our commitment to avoid relationships with suppliers that do not act with integrity, are non-compliant with applicable rules and regulations, or that infringe environmental, social or governance standards. We rolled out this approach to our main markets during the first quarter of 2022.

The **Sustainable Sourcing policy** is intended primarily for the Adevinta procurement team and any employee involved in purchasing activities. It aims to embed the consideration of environmental, social and ethical factors throughout the sourcing lifecycle when employees evaluate or prioritise potential suppliers.

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. In order to ensure transparency, this Code is available on the [corporate website](#) and included in the procurement team’s RFP (request for proposal) process for the provision of services.

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. The table below shows the Code’s content structure.

We strongly believe in committed supplier partnerships and we have set up appropriate channels for suppliers to contact us if they have any questions or discover breaches of the Code, either within the supplier’s organisation or within any of its subcontractors and/or other participants in its supply chains. Such channels include a third-party operated whistle-blower function through which a supplier can anonymously report any non adherence with, including but not limited to, the Code, internal Adevinta policies and local regulations.

The table below shows the Suppliers' Code's content structure:



Human rights

- Child labour
- Modern slavery
- Fair and equal treatment
- Labour rights
- Freedom of association and collective bargaining
- Employment terms
- Compensation and wages
- Health and safety



Environment

- Resource efficiency and energy consumption
- Emissions
- Water and effluents
- Waste
- Environmental management
- Transport
- Sourcing from conflict-affected and high-risk areas



Anti-corruption, business integrity and ethical conduct

- Anti-corruption
- Facilitation payments
- Business gifts and hospitality
- Conflict of interest
- Free competition
- Corporate image and reputation
- Supply chain integrity
- Record keeping



Data protection and information security

- This section highlights the need to protect the privacy of our:
- users
 - customers
 - suppliers
 - employees

Our next steps:

- We would like to review our current supplier taxonomy as we need to make sure it is adapted to our business model after the merger with eBay Classifieds Group, and that it is adapted to the company's new strategy.
- We would like to review the entire risk-assessment process based on the reviewed taxonomy and the requirements laid out in the EU Directive on corporate sustainability due diligence.
- Based on the above outcome, we will assess whether or not we will need to review the Supplier Code of Conduct to ensure it is focused on the most prevalent risk.

EU Taxonomy regulation

The EU Taxonomy Regulation adopted in 2020 aims to drive private investments into environmentally sustainable activities by providing businesses and investors with a common language to identify such investments and activities.

The EU Taxonomy Regulation sets out an exhaustive list of environmental objectives that economic activity can help to fulfil, such as climate change mitigation and the transition to a circular economy.

The European Commission is tasked to adopt Delegated Acts to define the technical screening criteria describing the significant contribution, with the support of the Platform for Sustainable Finance.

Trade in second-hand goods as an economic activity contributes to the transition to a circular economy

In March 2022, the Platform for Sustainable Finance submitted a set of recommendations to the Commission regarding four environmental objectives the EU Taxonomy Regulation should adopt. One of these specifically recommends that the sale of second-hand goods should be identified as an economic activity that can provide a substantial contribution to a circular economy.

Marketplaces for the trade of second-hand goods for reuse to be recognised as enabling activities

In November 2022, the Platform published additional recommendations on the methodology for identifying the enabling activities.

The Platform recommends including “marketplaces for the trade of second-hand goods for reuse” as enabling activities, as recognised under the EU Taxonomy Regulation, including B2B, B2C and C2C sales. The report mentions specifically the examples of generalist online classifieds marketplaces such as Marktplaats, leboncoin or Zillow which contain ads from professionals as well as non-professionals.

The Platform worked under the assumption that prolonging the lifetime of goods through reuse would have a displacement effect on consumption and on production insofar as second-hand items are bought instead of new items. There was reference to several market surveys showing that a substantial proportion (in the range of 60% to 70%) of the respondents bought second-hand instead of new goods.

The report recognises that without marketplaces, the target activity would not be performed (at least, not on such scale). By connecting buyers/users with sellers of second-hand goods, the enabling activity of second-hand marketplaces can be seen as instrumental for the target activity. Regarding overall positive environmental impacts, the report specifically refers to the Adevința 2020 Second Hand Effect report.

The European Commission will take these recommendations into account when drafting its second Delegated Act under the EU Taxonomy Regulation. A public consultation on a draft Delegated Act is expected in Q1 2023 and the Delegated Act to be adopted by the end of Q2 2023.

“Adevinta contributes to the public debate around the digital transition to a circular economy.

Policy activity and public affairs

As a global classifieds specialist with market-leading positions in key European markets, Adevinta is committed to ensuring that any lobbying activity is undertaken in compliance with all applicable laws and transparency requirements. In 2022, Adevinta therefore specified in the Adevinta Code of Ethical Conduct that all of its political and lobbying activities (including meetings with government officials) should be coordinated with its Public Affairs Department.

The Code of Ethical Conduct also outlines that any charitable payments or political donations that Adevinta makes should be to a legitimate, registered organisation and must not under any circumstances be made to influence a business outcome. Furthermore, all charitable payments or political donations must be approved by the local CEO or CFO and local Board of Directors, and such payments or donations are to be recorded in the company accounts.

Adevinta contributes to the public debate around the digital transition to a circular economy and is engaging with governments and EU institutions in the development of public policies. As a leading online classifieds group operating digital marketplaces in nine European countries, Adevinta is involved in professional associations whose members promote the role of the classifieds industry in economic and sustainable development and share best practices.

The messaging to which Adevinta contributes, in respect of the development of public policies, focuses on the necessity of open markets and fair competition to support sustainable growth of European Union tech champions, the need for long-term and stable policy frameworks fostering the growth of digital services while protecting users, as well as the importance of ensuring the green digital transition.

In 2022, we spent approximately €460,000 on external lobbying services, which represented 0.03% of our annual turnover for that year. Approximately three-quarters of the total expenditure went into trade association memberships that largely serve business purposes (as opposed to political activity).

Adevinta is registered in the European Union Transparency Register and the Lobby Register of the German Bundestag.

€119,400

Lobbying activities

€339,661

Trade association memberships

€459,061

Total Adevinta expenditure

About this report

This is Adevinta's fourth annual sustainability report. The previous report was published on 28 April 2022. Information disclosed in this report refers to activities undertaken from 1 January to 31 December 2022.

This report has been prepared in accordance with the GRI Standards: Core option, and follows the guidelines set out in the Euronext Guidelines for Environmental, Social and Governance (ESG) reporting. Adevinta will publish a sustainability report on an annual basis. The report has not been subject to external independent assurance. The sustainability information is provided throughout the Annual Report. Please see the GRI Index for further guidance.

Scope and boundaries

The report includes data pertaining to companies of which Adevinta has had full ownership or operational control throughout the year, with certain scope limitations included below. Companies that have been sold during the year have been excluded.

Employee data

Employee data, as per 31 December 2022, is stated as headcount and covers all companies in scope. This includes all companies that are integrated in the human capital management system Workday®. Data relating to employee engagement were retrieved from Adevinta's engagement survey and templates completed by each company. Data relating to collective bargaining agreements and performance reviews were collected via the human capital management system.

Data relating to health and safety were collected via templates completed by each company. Due to privacy limitations in the legislation of certain countries, it has not been possible to distinguish between recordable ill-health and recordable injuries for the operations in these countries. As a consequence, the information from these countries' operations has been excluded from the recordable ill-health and injuries presented in this report. As for the year 2022, this was relevant for Germany, Italy and Spain.

We were unable to publish the share of sick leaves out of the total worked hours during 2022, as not all the companies in scope were

within the same human capital management system. We are working at gathering this data in order to reflect it in the next reporting cycle.

Environmental data

The consolidation approach for environmental data is operational control. For smaller legal entities co-located with other Group companies, environmental data have been collected from the larger companies. Data from holding companies with less than five employees have been excluded. Data from joint-ventures with less than 20 employees, and where Adevinta owns less than 51% stake, have also been excluded. All greenhouse gases are included in the emissions calculations and all scopes are included in the intensity data. The total GHG emissions includes the Scope 2 emissions from the location-based method. Data was collected via templates sent to each company and via available internal reporting data. The calculations are based on conversion factors from the International Energy Agency (IEA), the Association of Issuing Bodies (AIB), the Department for Environment, Food & Rural Affairs (DEFRA) and the US Environmental Protection Agency (US EPA).

Calculations for a portion of the emissions from business travel where only expenses have been available for taxi, bus, train and car rental have been estimated with assumptions on the average price for a ticket or distance driven with rental cars. Calculations for electricity and emissions for co-working spaces have not been available and have been estimated using an average of utility use per employee and country specific conversion factors for electricity. Scope 2 emissions are reported with a location-based approach and a market-based approach separately. The Scope 3 emissions categorised as fuel- and energy-related activities include upstream emissions of purchased fuels as well as transmission and distribution losses from electricity. Scope 3 emissions from other categories like purchased goods and services, and data centre electricity use, employee commuting and capital goods, have also been reported.

Omissions

GRI Standards General and Material Disclosures

2-23: While policies are implemented at group level and described in this report, we are unable to report on all the information required for this year.

2-24: The organisation is still being structured, we are unable to report on all the information required for this year.

2-25, 2-26: A grievance mechanism has been implemented and is presented in this report. We are unable to describe more processes and mechanisms as the organisation is still being structured.

2-27: The information regarding compliance with laws and regulation is not available this year.

204-1, 302-5, 308-1, 401-3, 403-5, 414-1: A reporting structure is under development, information cannot be shared in this report.

302-1: Total fuel consumption from renewable/non-renewable sources is not possible to disclose due to limitations in the information from suppliers.

305-6, 305-7: Adevinta does not have a significant impact in terms of ODS and air emissions considering the activities of the company

401-1: Partly fulfilled: due to limitations in the reporting system, data on the number of employees who left the company cannot be fully segmented by age.

401-2: The information regarding benefits for employees is different in each country we operate, we are unable to report on each local specificity.

402-1, 3-3-Labour/management relations: While some information is presented in this report, the information regarding labour relations are different in each country we operate, we are unable to report on each local specificity.

403-1, 403-2, 403-4, 403-7, 403-8: Adevinta does not have a management system, worker consultation and risk management process regarding health and safety.

403-9, 403-10: Due to specific legal prohibitions in Spain, Germany and Italy, where privacy law prohibits an employer from recording the cause of sick leave, and also as a consequence of the eCG acquisition, the systems for reporting are currently not aligned and the available data only partially fulfils the requirements this year. Currently, data is unavailable for six companies.

407-1: Adevinta does not operate in countries at risk regarding freedom of association and collective bargaining.

Point of contact

If you have any questions about the sustainability report, you are welcome to contact Christelle Esquirol, Director of Sustainability at sustainability@adevinta.com.

GRI content index

Adevinta has reported the information cited in this GRI content index for the period 1 January 2022 to 31 December 2022 with reference to the GRI Standards.

GRI Standard	Disclosure	Page	Fulfilment	Notes
General Disclosures				
GRI 2: General Disclosures 2021	2-1 Organisational details	6-9	Fulfilled	
	2-2 Entities included in the organisation's sustainability reporting	21-23 & 72	Fulfilled	
	2-3 Reporting period, frequency and contact point	72-73	Fulfilled	
	2-4 Restatements of information	–	–	No restatement made
	2-5 External assurance	–	–	No external assurance
	2-6 Activities, value chain and other business relationships	3 & 6-9	Fulfilled	
	2-7 Employees	47	Fulfilled	
	2-8 Workers who are not employees	–	Omission	See p. 72-73
	2-9 Governance structure and composition	58 & 80-89	Fulfilled	
	2-10 Nomination and selection of the highest governance body	80-89	Fulfilled	
	2-11 Chair of the highest governance body	80-89	Fulfilled	
	2-12 Role of the highest governance body in overseeing the management of impacts	80-89	Fulfilled	
	2-13 Delegation of responsibility for managing impacts	80-89	Fulfilled	
	2-14 Role of the highest governance body in sustainability reporting	80-89	Fulfilled	
	2-15 Conflicts of interest	58-60 & 80-89	Fulfilled	
	2-16 Communication of critical concerns	60	Fulfilled	
	2-17 Collective knowledge of the highest governance body	58	Fulfilled	
	2-18 Evaluation of the performance of the highest governance body	80-89	Fulfilled	
	2-19 Remuneration policies	80-89	Fulfilled	
	2-20 Process to determine remuneration	80-89	Fulfilled	
	2-21 Annual total compensation ratio	80-89	Fulfilled	
	2-22 Statement on sustainable development strategy	32	Fulfilled	
	2-23 Policy commitments	58-60 & 66	Partly fulfilled	See p. 72-73
	2-24 Embedding policy commitments	–	Omission	See p. 72-73
	2-25 Processes to remediate negative impacts	58-60	Partly fulfilled	See p. 72-73
	2-26 Mechanisms for seeking advice and raising concerns	58-60	Partly fulfilled	See p. 72-73
	2-27 Compliance with laws and regulations	–	Omission	See p. 72-73
	2-28 Membership associations	–	-	No current membership
	2-29 Approach to stakeholder engagement	34-35	Fulfilled	
	2-30 Collective bargaining agreements	54	Fulfilled	
Material topics				
GRI 3: Material Topics 2021	3-1 Process to determine material topics	34-35	Fulfilled	
	3-2 List of material topics	34-35	Fulfilled	
Indirect economic impacts				
GRI 3: Material Topics 2021	3-3 Management of material topics	55-57	Fulfilled	
GRI 203: Indirect Economic Impacts 2016	203-1 Infrastructure investments and services supported	55-57	Fulfilled	
	203-2 Significant indirect economic impacts	55-57	Fulfilled	

GRI Standard	Disclosure	Page	Fulfilment	Notes
Procurement practices				
GRI 3: Material Topics 2021	3-3 Management of material topics	66	Fulfilled	
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	–	Omission	See p. 72-73
Anti-corruption				
GRI 3: Material Topics 2021	3-3 Management of material topics	58-60 & 66	Fulfilled	
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	58-60 & 66	Fulfilled	
	205-2 Communication and training about anti-corruption policies and procedures	58-60 & 66	Fulfilled	
	205-3 Confirmed incidents of corruption and actions taken	58-60	Fulfilled	
Anti-competitive behaviour				
GRI 3: Material Topics 2021	3-3 Management of material topics	60-62	Fulfilled	
GRI 206: Anti-competitive Behaviour 2016	206-1 Legal actions for anti-competitive behaviour, anti-trust and monopoly practices	60-62	Fulfilled	
Energy				
GRI 3: Material Topics 2021	3-3 Management of material topics	40	Fulfilled	
GRI 103: Management Approach	302-1 Energy consumption within the organisation	41	Partly Fulfilled	
	302-2 Energy consumption outside of the organisation	41	Fulfilled	
	302-3 Energy intensity	41	Fulfilled	
	302-4 Reduction of energy consumption	41	Fulfilled	
	302-5 Reductions in energy requirements of products and services	–	Omission	See p. 72-73
Emissions				
GRI 3: Material Topics 2021	3-3 Management of material topics	40	Fulfilled	
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	41	Fulfilled	
	305-2 Energy indirect (Scope 2) GHG emissions	41	Fulfilled	
	305-3 Other indirect (Scope 3) GHG emissions	41	Fulfilled	
	305-4 GHG emissions intensity	41	Fulfilled	
	305-5 Reduction of GHG emissions	40	Fulfilled	
	305-6 Emissions of ozone-depleting substances (ODS)	–	Omission	See p. 72-73
	305-7 Nitrogen oxides (NOx), sulfur oxides (SOx) and other significant air emissions	–	Omission	See p. 72-73
Waste				
GRI 3: Material Topics 2021	3-3 Management of material topics	41	Fulfilled	
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	41	Fulfilled	
	306-2 Management of significant waste-related impacts	41	Fulfilled	
	306-3 Waste generated	41	Fulfilled	
	306-4 Waste diverted from disposal	41	Fulfilled	
	306-5 Waste directed to disposal	41	Fulfilled	

GRI Standard	Disclosure	Page	Fulfilment	Notes
Supplier environmental assessment				
GRI 3: Material Topics 2021	3-3 Management of material topics	66	Fulfilled	
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	–	Omission	See p. 72-73
	308-2 Negative environmental impacts in the supply chain and actions taken	66	Fulfilled	
Employment				
GRI 3: Material Topics 2021	3-3 Management of material topics	46-54	Fulfilled	
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	54	Partly Fulfilled	
	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	–	Omission	See p. 72-73
	401-3 Parental leave	–	Omission	See p. 72-73
Labour/management relations				
GRI 3: Material Topics 2021	3-3 Management of material topics	54	Partly fulfilled	See p. 72-73
GRI 402: Labour/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	54	Partly fulfilled	See p. 72-73
Occupational health and safety				
GRI 3: Material Topics 2021	3-3 Management of material topics	54	Fulfilled	
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	–	Omission	See p. 72-73
	403-2 Hazard identification, risk assessment and incident investigation	–	Omission	See p. 72-73
	403-3 Occupational health services	54	Fulfilled	
	403-4 Worker participation, consultation and communication on occupational health and safety	–	Omission	See p. 72-73
	403-5 Worker training on occupational health and safety	–	Omission	See p. 72-73
	403-6 Promotion of worker health	54	Fulfilled	
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	–	Omission	See p. 72-73
	403-8 Workers covered by an occupational health and safety management system	–	Omission	See p. 72-73
	403-9 Work-related injuries	54	Partly Fulfilled	
	403-10 Work-related ill health	54	Partly Fulfilled	
Training and education				
GRI 3: Material Topics 2021	3-3 Management of material topics	51-53		
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	51-53	Fulfilled	
	404-2 Programmes for upgrading employee skills and transition assistance programmes	51-53	Fulfilled	
	404-3 Percentage of employees receiving regular performance and career development reviews	53	Fulfilled	

GRI Standard	Disclosure	Page	Fulfilment	Notes
Diversity and equal opportunity				
GRI 3: Material Topics 2021	3-3 Management of material topics	48-51		
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	50	Fulfilled	
	405-2 Ratio of basic salary and remuneration of women to men	50	Fulfilled	
Non-discrimination				
GRI 3: Material Topics 2021	3-3 Management of material topics	48-51	Fulfilled	
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	–	–	No incident reported
Freedom of association and collective bargaining				
GRI 3: Material Topics 2021	3-3 Management of material topics	54	Fulfilled	
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	–	Omission	See p. 72-73
Local communities				
GRI 3: Material Topics 2021	3-3 Management of material topics	55-57	Fulfilled	
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programmes	55-57	Fulfilled	
	413-2 Operations with significant actual and potential negative impacts on local communities	55-57	Fulfilled	
Supplier social assessment				
GRI 3: Material Topics 2021	3-3 Management of material topics	66	Fulfilled	
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	–	Omission	See p. 72-73
	414-2 Negative social impacts in the supply chain and actions taken	66	Fulfilled	
Public policy				
GRI 3: Material Topics 2021	3-3 Management of material topics	70	Fulfilled	
GRI 415: Public Policy 2016	415-1 Political contributions	70	Fulfilled	
Customer privacy				
GRI 3: Material Topics 2021	3-3 Management of material topics	62-65	Fulfilled	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	62-65	Fulfilled	

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