



# Depop Supplier Code of Conduct

Depop's Code of Conduct outlines standards for conducting business in an ethical, lawful and responsible way. In accordance with these standards, Depop has established this Supplier Code of Conduct to ensure its suppliers are committed to the same principles.

Suppliers, their employees, agents, and subcontractors (collectively referred to as "Suppliers") may enter into agreements with Depop to conduct business with us or on our behalf. All Suppliers are required to comply with this Supplier Code of Conduct and all applicable laws and regulations. Depop expects Suppliers to have strong corporate governance in place to support their compliance with this Code of Conduct. Depop may audit a Supplier upon reasonable notice to help confirm compliance with this Code of Conduct. Depop reserves the right to discontinue a Supplier relationship in the event they are found to be acting unlawfully or in violation of this Code of Conduct or any applicable Depop policy.

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# Legal and Regulatory Compliance



**Anti-Corruption:** Never give, offer, or accept anything of value to gain an improper advantage, whether it be in dealings with government officials or the private sector. Suppliers are required to comply with all applicable laws and regulations, including, for example, the Foreign Corrupt Practices Act and United Kingdom Bribery Act of 2010.

**Antitrust:** Do not participate in any anti-competitive conduct such as discussing or exchanging competitively sensitive information or agreeing to geographic markets, customers or pricing with competitors. Suppliers are required to comply with all applicable antitrust and fair competition laws.

**Trade:** Comply with applicable import and export laws, act in accordance with trade restrictions and economic sanctions imposed by the US Treasury Department's Office of Foreign Assets Control (OFAC) and any other applicable trade restrictions.

# Business Practices and Ethics



**Conflicts of Interest:** Avoid conflicts of interest or even the appearance of conflicts of interest. Suppliers must not deal directly with any Depop employee whose spouse, domestic partner or other relative has an interest in the Supplier as an employee, partner, owner, investor, or similar roles, including negotiating the Supplier contract.

**Gifts and Hospitality:** Avoid giving gifts or providing lavish hospitality to Depop employees. If offering a gift or hospitality to a Depop employee, Suppliers should use good judgement and ensure it complies with applicable laws, and is consistent with local customs.

**Insider Trading:** Do not buy or sell Etsy stock when in possession of material non-public information, or pass such information to any others, including friends or family.

**Records Management:** Accurately record, maintain, and report financial and business information. Ensure compliance with all applicable laws and regulations regarding such information.

**External Communications:** Do not speak publicly on Depop's behalf or about Depop unless authorised to do so by Depop Legal.

**Risk Management:** Implement internal policies, procedures, and controls to identify, address, and remediate risks addressed in this Code of Conduct as well as applicable legal requirements.

**Training and Communication:** Communicate this Code of Conduct to all employees or contractors who will be conducting business with Depop and conduct training for employees, when necessary.

# Labour Practices

SPORTS CLUB  
ADANOLA

**Anti-harassment and Unlawful Discrimination:** Provide equal opportunity employment and maintain a respectful work environment that is free of discrimination, violence, harassment, retaliation, and intimidation.

**Human Rights:** Respect human rights, provide fair working conditions and prohibit forced, compulsory or child labour. It is recommended that suppliers maintain a human rights policy, systems for evaluating and managing their human rights impacts, and a strategy to reduce any negative impacts.

**Compensation:** Provide compensation (including overtime and benefits) that at a minimum, complies with local laws. Suppliers must pay their employees in a timely manner and provide documentation detailing the basis of their pay (e.g., paystub).

**Parental Leave:** Abide by all applicable laws pertaining to parental leave, and offer paid benefits that are gender inclusive when possible.

**Freedom of Association:** Abide by all applicable laws pertaining to freedom of association and collective bargaining. Do not retaliate against employees who choose to organise.

# Environmental Protection



**Compliance with Environmental Laws and Regulations:** Abide by all applicable laws for hazardous materials management and disposal, air emissions, waste and wastewater treatment and discharges.

**Ecological Footprint:** Conduct business in an environmentally responsible and sustainable manner, including: resource-efficient consumption of energy, water and other natural resources, minimising waste and prioritizing waste diversion from landfills, and reducing harmful chemical use. It is recommended that suppliers have systems for managing, measuring and reporting their environmental impacts, and a strategy to reduce any negative impacts.

# Protection of Data, Intellectual Property, and Assets



**Data Protection:** Protect confidential and proprietary information of Depop, Depop employees, members, and others with whom we do business. Information should not be disclosed without proper authorisation and should only be used for a legitimate business purpose. All information uses, retention practices, and disclosure to third parties must comply with all applicable laws, regulations, and governing contracts.

**Protect Depop's Intellectual Property and Assets:** Protect and use Depop's intellectual property and tangible assets responsibly. Depop's intellectual property (including name, logo, trademarks, trade secrets, etc.) and tangible assets should be used for legitimate business purposes and when authorised to do so by Depop.



# Reporting Concerns

If an individual becomes aware that a Supplier is potentially in violation of this Code of Conduct they are required to notify Depop immediately.

**Whistleblower Hotline:** To report concerns about activity related to violations of this Supplier Code of Conduct you may do so confidentially, anonymously (if desired), and free of retaliation. You may report violations to your contact at Depop or by any of the following:

- Phone:

Region	Phone Number
Australia	1-800-950-665
Brazil	0800 200 3514
UK	0808 101 1123
USA and Canada (Toll Free)	+1 (866) 887-9755

- Online: <https://etsy.i-sight.com/portal>
- By Mail:
  - Chair, Audit Committee of the Board
  - % General Counsel
  - 117 Adams Street
  - Brooklyn, NY 11201, USA