



eBay (UK) Limited

Slavery and Human Trafficking Statement – Modern Slavery Act

1. Financial year

1.1 This slavery and human trafficking statement relates to eBay (UK) Limited's financial year beginning 1 January 2016 and ending 31 December 2016.

2. Introduction

2.1 We are committed to a programme of continuous improvement in our practices to combat slavery and human trafficking in our supply chains and in our business.

2.2 This year we have:

- (a) Appointed external advisors to assist the company in our approach to the issue of modern slavery and compliance with the UK Modern Slavery Act 2015.
- (b) Formed an internal core team to work on modern slavery issues, such team to be extended in early 2017. The full team will comprise of representatives from:
 - a. legal;
 - b. compliance;
 - c. procurement;
 - d. human resources;
 - e. facilities; and
 - f. public relations.
- (c) Reviewed eBay Inc.'s practices and established that eBay Inc. currently has a policy that substantially covers areas that it is anticipated this statement should cover, such policy being "eBay Responsible Business" which also incorporates the eBay Supplier Code of Conduct and has a section on "Labor and Human Rights". eBay Inc. also received a score of 100% in the Corporate Equality Index compiled by the Human Rights Campaign Foundation.
- (d) Reviewed eBay's standard service agreement template which incorporates the eBay Supplier Code of Conduct into the terms of business of a large number of our supplier relationship.
- (e) Produced and circulated a guidance note on the provisions of the Modern Slavery Act to the eBay (UK) Ltd directors.
- (f) Trained a company director on the key elements of the Modern Slavery Act.
- (g) Checked eBay group policies and verified that eBay Inc. has personnel responsible for establishing that eBay (UK) Ltd employees have a valid right to work in the UK.



- 2.3 We are committed to acting ethically in all our business dealings and relationships, wherever we operate, and implementing and enforcing effective systems and practices to counter slavery and human trafficking.
- 2.4 We will uphold and comply with all laws relevant to countering slavery and human trafficking in all the jurisdictions in which we operate. We understand that we are covered by the UK Modern Slavery Act 2015 because:
- (a) we are a body corporate;
 - (b) carrying on business or a part of its business in the UK;
 - (c) that supplies goods or services; and
 - (d) has a turnover of over £36 million per year.

3. Organisation's structure

- 3.1 eBay (UK) Limited is part of the eBay group and currently provides mainly marketing, advertising and legal support, amongst some other functions, to other eBay group companies in and outside of the European Union. eBay (UK) Limited does not contract with eBay site users. Our main suppliers are:
- (a) IT infrastructure suppliers;
 - (b) Facilities, infrastructure and administrative suppliers (cleaning, reception, catering, furniture, etc.);
 - (c) Pension, insurance and other providers of employee benefits for eBay (UK) Limited employees;
 - (d) Recruitment agencies for sourcing eBay (UK) Limited employees; and
 - (e) Event organisers, design agencies, audience targeting data providers, media buying agencies, customer relationship management solutions, trade bodies and publications and conference providers, all used to support eBay's advertising team.

4. eBay policies on slavery and human trafficking

- 4.1 Below are links to the eBay Responsible Business Policy and the eBay Supplier Code of Conduct.

eBay Responsible Business Policy – <https://www.ebayinc.com/global-impact/responsible-business/>

eBay Supplier Code of Conduct – <https://www.ebayinc.com/assets/Uploads/Supplier-Code-of-Conduct-Final-Revised-Oct-2016.pdf>

- 4.2 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. This statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.



5. Effectiveness

5.1 It is too early to say with any certainty how effective the steps we are taking have been and will be in ensuring that slavery and human trafficking is not taking place in our business or supply chains. As part of our work for the next financial year we will be considering how best to monitor the effectiveness of the actions taken.

6. Next steps

6.1 In the next financial year we are proposing to:

- (a) Review these policies further to determine whether any other eBay policies can/should be amended.
- (b) Organise wider training for the internal team working on these issues.
- (c) Consider formalising the existing informal process in place to deal with general reputational issues, including those relating to modern slavery.
- (d) Drive awareness of this issue to other eBay entities in Europe and the US.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015. It has been approved by the board of eBay (UK) Limited and constitutes our slavery and human trafficking statement for the financial year ending 31 December 2016.

Signed:

Director

Name: Alec Latimer

EBAY (UK) LIMITED

Date: 21 February 2017