



EBAY GROUP SERVICES GMBH  
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eBay Group Services GmbH, [REDACTED]

FOUR PAWS International  
Helmut Dungler, Founder and President  
Linke Wienzeile 236  
**1150 Wien, Österreich**

[REDACTED] 16.03.2018

**Your letter of 12<sup>th</sup> February 2018**

Dear Mr Dungler,

On behalf of our President and CEO Mr Wenig, I am responding to your letter of 12<sup>th</sup> February 2018.

The eBay Classifieds Group ("eCG") is a collection of ten local brands that aim to create connected commerce, enabled by people, supported by technology and open for everyone. The simplicity of the platforms resulting in large local audiences trading together safely and successfully is at the heart of classifieds.

Our local eCG platforms are complementary to the eBay platform. While both connect buyers and sellers to trade with each other, there are some fundamental differences between the eBay marketplaces and classifieds platforms.

On classifieds the actual transaction, payment and delivery take place off-platform (mostly local and in person) and directly between buyers and sellers. On eBay, transactions take place on-platform and sellers perform long-distance sales with products being shipped from the seller to the buyer. This fundamental difference explains why eBay has made the decision to not allow any trade in living animals while this is allowed on the eCG platforms. The opportunity to meet in person, ask questions, inspect the pet, check documentation, knowing who the new owner for their pet will be, makes a fundamental difference between our classifieds and marketplaces business models.

Our local eCG platforms aim to facilitate and stimulate safe and responsible trade by abiding to local laws and introducing appropriate, practical and proportional local measures, in close partnership with local law enforcement, authorities and NGO's. As a result of our conversa-

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tions with FOUR PAWS, we have explicitly included this in our global eCG Purpose Statement. The implementation hereof however lies with the local eCG platforms that eCG consists of. Collaboration with stakeholders at local government, law enforcement and animal welfare organizations is key for local eCG platforms to educate users in how they can responsibly buy and sell pets and to fight any illegal or irresponsible sellers together.

Over the years, our local eCG platforms have developed a wide variety of measures and initiatives in relation to pets trade in collaboration with these key stakeholders, incl. FOUR PAWS, and they continue to do so. As the operating environment and circumstances of each local platform and country in which that platform operates varies, the policies and measures of each of our local platforms are tailored to the specific market. The policies and measures are driven by local laws, local government and animal welfare organizations collaborations, local technical capabilities and local customer feedback. Some examples of what our local eCG platforms do:

- Executing a wide variety of user education initiatives raising awareness with our users and advising them in their follow up interactions and transactions which take place off our platforms (what questions to ask, what documentation to review, etc.).
- Implementing strict pets policies making explicit that illegal trade is not allowed, including guidance as to what is legal and what not. In addition, local eCG platforms work closely with local stakeholders on pets advertising guidelines and/or policies.
- Implementing improvements in our pets categories to help sellers comply with the law and to help buyers to make educated decisions.
- Providing functionality both for eCG's local platform's engaged community and third party experts to help us detect illegal listings. Our support departments review all reported listings and takes appropriate actions such as removing listings and blocking accounts.
- Liaising with local law enforcement and animal welfare organizations that have local expertise and powers to act. Local eCG platforms collaborate in fighting illegal activity such as supporting investigations into concrete sellers.

The nature of our local classifieds platforms is to connect buyers and sellers in an easy and simple way, allowing everyone to participate, while the trade itself happens off our local platforms between buyers and sellers directly. In line with this, the verification process on local eCG platforms is based on primarily the e-mail address which is needed to provide our service (i.e. allowing people to post their listings). In addition we have the unique character of classifieds that requires people to meet in person which allows for proper verification by asking questions, inspecting the pet, checking documentation and knowing who the new owner for their pet will be. Consequently and in line with our ambition to introduce policies that are appropriate, practical and proportionate, we generally see no value in requiring additional seller verification.

eCG is of course interested to further improve what we have already accomplished. As mentioned in our previous response, our local eCG teams remain at your disposal to continue our conversations on how we can continue to improve our animal trading standards together with other local stakeholders.

Yours sincerely,

