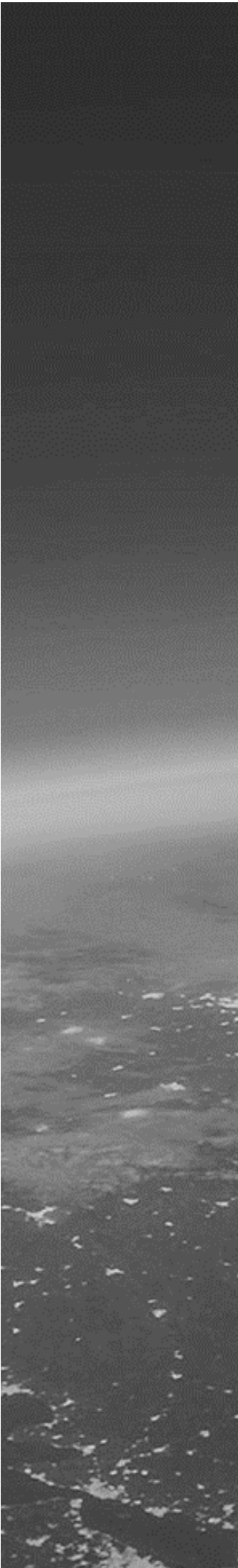


**Global**e

Smart Cross-Border™



**GLOBAL-E  
CODE OF BUSINESS CONDUCT  
March 2024**





## Disclosure of Amendments to the Code of Business Conduct

On March 27, 2024, the board of directors (the “**Board**”) of Global-E Online Ltd. (the “**Company**”) approved certain amendments to the Company’s Code of Business Conduct and Ethics (the “**Code**”) related to (a) the Company’s expectations regarding accountability and responsibility; (b) the reporting process for conflict of interests; (c) safeguarding data privacy and consumer personal information; (d) the Company’s policies with respect to discrimination and harassment; and (e) health, safety and environmental protection in the workplace (together, the “**Amendments**”).

Other changes to the Code include changes of a technical, administrative and non-substantive nature.

The Code, as amended, has been posted to the “Governance” section of the “Investor Relations” page of our website.

The Amendments do not result in any waiver, explicit or implicit, from any provision of the Code as in effect prior to the Board’s action to amend the Code.

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## **A Message from Amir Schlachet, Chief Executive Officer**

It is important for our company and all of us individually to maintain the high standards of integrity and ethical behavior that our colleagues, customers, partners and shareholders expect. The Global-e Online Ltd. Code of Conduct includes guidelines for appropriate interactions and communications with our customers, fellow employees and other stakeholders, as well as our fundamental rules for doing business. We are all responsible for upholding the values and the culture and are accountable for how others interact with and perceive Global-e.

We know that we could never build a framework that anticipates every possible workplace or ethical dilemma you might encounter, but this Code of Conduct provides a solid framework to help you and all of us understand our individual and collective expectations and recognize when you should ask for help.

Please familiarize yourself with the details of this Code and ensure that you are operating in alignment with our purpose and values. If you have questions, concerns or a need to raise behaviors or actions that you believe are not consistent with the Code, contact your supervisor or the General Counsel. Thank you for all you do to ensure that Global-e continues to be a high-performing, high integrity company.

***Amir Schlachet***

***Chief Executive Officer***

***Global-e Online Ltd.***

The Board of Directors (the “**Board**”) of Global-e Online Ltd. and its subsidiaries (collectively the “**Company**” or “**we**”) has adopted this Code of Conduct (the “**Code**”).

## Using the Code of Conduct

The Code is designed to provide clarity about the Company’s expectations and to reinforce the need to maintain a consistent culture of ethics, honesty, and transparency. This Code will help facilitate conversations about how to make choices when presented with ethical issues and sets forth guiding principles. The Code is intended to summarize many of the compliance standards, policies, and procedures within the Company, but it cannot address every possible issue or decision that may arise. You should use your own good judgment in tandem with the Company’s standards, policies, and procedures.

The purpose of this Code is to encourage:

- honest and ethical conduct, including fair dealing and the ethical handling of actual or apparent conflicts of interest;
- full, fair, accurate, timely and understandable disclosure;
- compliance with applicable governmental laws, rules and regulations;
- prompt internal reporting of any violations of law, this Code or other policies;
- accountability for adherence to this Code, including fair process by which to determine violations;
- consistent enforcement of this Code, including clear and objective standards for compliance;
- protection for persons reporting any questionable behavior;
- the protection of the Company’s legitimate business interests, including its assets and corporate opportunities;
- confidentiality of information entrusted to directors, officers and employees by the Company and its customers;
- responsible and appropriate information sharing on social media; and
- the prevention of modern slavery and human trafficking.

## Who Must Follow the Code

All directors, officers, employees, including temporary, part-time, and seasonal employees and contractors (who, unless otherwise specified, will be referred to throughout this Code as “you”) of the Company and all of its subsidiaries are expected to know and follow the letter and spirit of the Code in addition to our other internal policies and to review updates when they are issued.

It does not matter what your rank or title is, you must adhere to this Code and the principles and procedures outlined in this Code. If you are a manager, you must oversee the adherence to this Code by your reports. Managers are expected to encourage ethical conduct and compliance.

## Conflicts of Interest

A conflict of interest occurs when your private interests interfere, or appear to interfere, with the interests of the Company as a whole. You should endeavor to avoid situations that present a potential or actual conflict of interest, or even the appearance of an actual or potential conflict of interest.

For example, a conflict of interest can arise when you take actions or have personal interests that may make it difficult to perform your work objectively and effectively. A conflict of interest may also arise when you, or a member

of your immediate family, receives improper personal benefits as a result of your position at the Company. Under this Code, an “immediate family member” includes your children, stepchildren, parent, stepparent, spouse, domestic partner, legal guardians, sibling, grandparents, grandchildren, and current in-laws, or any person (other than a tenant or employee) sharing your household.

Conflicts of interest can also occur indirectly. For example, a conflict of interest may arise when you are an executive officer or a major shareholder with a material interest in another company or organization doing business with the Company.

You have an obligation to conduct the Company’s business in an honest and ethical manner, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. You must disclose and seek approval before proceeding in situations where there is an actual or potential conflict of interest. Persons other than directors and executive officers who have questions about a potential conflict of interest or who become aware of an actual or potential conflict should discuss the matter with and seek a determination and prior authorization or approval from the appropriate supervisor, or the General Counsel. A supervisor may not authorize or approve conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first providing the General Counsel with a written description of the activity and seeking the General Counsel’s written approval. If the General Counsel is himself or herself involved in the potential or actual conflict, the matter should instead be discussed directly with the Chief Executive Officer. Directors and executive officers must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Audit Committee. Any transaction which creates, or is perceived to create, a conflict of interest must also be reviewed, and in certain circumstances approved, in accordance with the Company’s Related Party Transaction Policy and the Israeli Companies Law, 5759-1999.

Other common, but not exclusive, conflicts of interest you must refrain from are set out below:

- You may not engage in any conduct or activities that are inconsistent with the Company’s best interests or that disrupt or impair the Company’s relationship with any person or entity with which the Company has or proposes to enter into a business or contractual relationship.
- You may not accept compensation, in any form, for services performed for the Company from any source other than the Company. Please reference the for guidelines surrounding acceptance of gifts.
- You may not take up any management or other employment position with, or have any material interest in, any firm or company that is in direct or indirect competition with the Company.

Executive officers of the Company must obtain prior approval from the Company’s General Counsel before serving on an advisory board, board of directors, or to serve as a trustee or officer of another organization.

***THIS CODE DOES NOT ATTEMPT TO DESCRIBE ALL POSSIBLE CONFLICTS OF INTERESTS THAT COULD ARISE***

## **Personal Investments**

You may not own, either directly or indirectly, a substantial interest in any business entity that does or seeks to do business with or is in competition with the Company without providing advance notice to the Audit Committee of the Board, Chairperson of the Board or the General Counsel. Investments in publicly traded securities of companies not amounting to more than five percent (5%) of that company’s total outstanding shares are permitted without such advanced approval.

## Corporate Opportunities

You owe a duty to the Company to advance the legitimate interests of the Company when the opportunity to do so arises. You are prohibited from directly or indirectly (a) taking personally for yourself opportunities that are discovered through the use of Company property, information or positions; (b) using Company property, information or positions for personal gain; or (c) competing with the Company for business opportunities. However, if the Company's disinterested directors of the Board determine that the Company will not pursue an opportunity that relates to the Company's business, you may, after notifying the disinterested directors of the board of directors of intended actions in order to avoid any appearance of conflict of interest.

## Disclosures

The information in the Company's public communications, including in all reports and documents filed with or submitted to the SEC, must be full, fair, accurate, timely and understandable.

To ensure the Company meets this standard, if you are involved with the Company's disclosure process, you must maintain familiarity with the disclosure requirements, processes and procedures applicable to the Company commensurate with your duties. You are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit, material facts about the Company to others, including the Company's independent auditors, governmental regulators and self-regulatory organizations.

## Compliance with Laws, Rules and Regulations

The Company is obligated to comply with all applicable laws, rules and regulations. It is your personal responsibility to adhere to the standards and restrictions imposed by these laws, rules and regulations in the performance of your duties for the Company.

The Chief Executive Officer, Chief Operations Officer, Chief Revenue Officer, Chief Financial Officer, Chief Technology Officer and the General Counsel (or persons performing similar functions) of the Company are also required to promote compliance by all employees with this Code and to abide by Company standards, policies and procedures.

## Insider Trading

Trading on inside information is a violation of both U.S. federal and Israeli securities laws. If you are in possession of material non-public information about the Company or companies with whom we do business, you must abstain from trading or advising others to trade in the respective company's securities from the time that they obtain such inside information until adequate public disclosure of the information. You must also refrain from recommending or suggesting that others purchase or sell Company securities while in possession of material non-public information.

## Reporting, Accountability and Enforcement

The Company promotes ethical behavior at all times and encourages you to talk to supervisors, managers and other appropriate personnel, including the officers and the General Counsel, when in doubt about the best course of action in a particular situation.

You should promptly report any suspected violations of laws, rules, regulations or the Code or any other unethical behavior by any director, officer, employee or anyone purporting to be acting on the Company's behalf to appropriate personnel, including officers, the General Counsel, and the Board or the relevant Board committee. Reports may be made anonymously, to the extent permitted by applicable law. If requested, confidentiality will be maintained, subject to applicable law, regulations and legal proceedings.

The Audit Committee of the Board or other appropriate officer or body shall investigate and determine, or shall designate appropriate persons to investigate and determine, the legitimacy of such reports. Do not try and conduct investigations on your own. The Audit Committee or other appropriate officer or body will then determine the appropriate disciplinary action. Such disciplinary action includes, but is not limited to, reprimand, termination with cause, and possible civil and criminal prosecution.

## **No Retaliation**

The Company will not retaliate, and will not tolerate retaliation of any kind for reports made in good faith, or for participating in the investigation of a concern or complaint. Good faith does not mean you have to be right about a concern, but that you honestly believed a concern to be true.

Retaliation or retribution for a report made in good faith of any suspected violation of laws, rules, regulations or this Code is cause for appropriate disciplinary action.

## **Confidentiality**

In carrying out the Company's business, you may learn confidential or proprietary information about the Company, its customers, distributors, suppliers or joint venture partners. Confidential or proprietary information includes all non-public information relating to the Company, or other companies, that would be harmful to the relevant company or useful or helpful to competitors if disclosed, including, without limitation, financial results or prospects, information provided by a third party, trade secrets, new product or marketing plans, research and development ideas, manufacturing processes, potential acquisitions or investments, customer lists, personally identifiable information of Company personnel, customers, partners, and vendors, or other information of use to the Company's competitors or harmful to the Company or its customers if disclosed.

You must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized by the General Counsel or determined to be legally mandated with the review and approval of the General Counsel. You must safeguard confidential information by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussion of confidential information in public areas such as planes, elevators, and restaurants and on mobile phones. This prohibition includes, but is not limited to, inquiries made by the press, analysts, investors or others. You also may not use such information for personal gain. These confidentiality obligations continue even after employment with the Company ends.

## **Fair Dealing**

You should endeavor to deal fairly with the Company's customers, service providers, suppliers, competitors and other Company's employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice. Inappropriate

use of proprietary information, misusing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is also prohibited.

## **Protection and Proper Use of Company Assets**

You should protect the Company's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability. Assets include, but are not limited to, the Company's offices, facilities, computers, workstations, supplies, network, equipment and furniture. All Company assets should be used only for legitimate business purposes. The obligation of employees to protect the Company's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports.

## **Data Privacy**

The Company takes necessary precautions to ensure protection of data and personal information and uses personal data for only relevant business purposes. Care should be exercised when handling personal data of others. All personally identifiable information that the Company maintains about its employees, officers, directors, customers, vendors, and partners will be collected and used only for its intended and lawful purpose and with the appropriate notice and consent of the individual, as required by local law.

## **Waivers**

Before you engage in any activity that would be prohibited by this Code, you must obtain a written waiver from the Board or other appropriate officer or body. Waivers of the Code for directors or executive officers must be approved by the Board and will be disclosed to the public as required by law or Nasdaq rules.

## **Accuracy of Business Records**

All financial books, records and accounts must accurately, fairly and timely reflect transactions and events, and conform both to U.S. generally accepted accounting principles and to the Company's system of internal controls. No entry may be made that intentionally hides or disguises the true nature of any transaction. If relevant, proper authorization should be documented contemporaneously with any records. You should therefore be clear, concise, truthful and accurate as possible when recording information.

## **Corporate Loans or Guarantees**

U.S. federal law prohibits the Company from making loans and guarantees of obligations to directors, executive officers, and members of their immediate families.



## Gifts and Favors

The purpose of business gifts and entertainment in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers. You must act in a fair and impartial manner in all business dealings. Gifts and entertainment should further the business interests of the Company and not be construed as potentially influencing business judgment or creating an obligation.

Gifts must not be lavish or in excess of the generally accepted business practices of one's country and industry. Gifts of cash or cash equivalents are never permitted. Requesting or soliciting personal gifts, favors, entertainment or services is unacceptable. You should contact the General Counsel to discuss if they are not certain that a gift is appropriate to receive or offer.

The FCPA prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country. In addition, the promise, offer or delivery to an official or employee of the U.S. government, of a gift, favor or other gratuity in violation of these rules would not only violate Company policy but could also be a criminal offense. State and local governments, as well as foreign governments, may have similar rules.

You are required to comply with the Company's [Anti-Bribery and Corruption Policy](#) and the Hospitality Policy.

## Antitrust Laws and Competition

The purpose of antitrust laws is to preserve fair and open competition and a free market economy, which are goals that the Company fully supports. You must not directly or indirectly enter into any formal or informal agreement with competitors that fixes or controls prices, divides or allocates markets, limits the production or sale of products, boycotts certain suppliers or customers, eliminates competition or otherwise unreasonably restrains trade.

## Money Laundering, Criminal Property and Terrorist Financing

Money laundering is the process by which people attempt to disguise illegally gained proceeds to make the proceeds appear to come from legitimate sources or activities, or, conversely, finance illegal activities using funds routed through legitimate sources. You are required to comply with all applicable anti-money laundering laws. You should act to ensure that the Company's assets and business are not used or utilized by any persons, be they directors, officers, employees, customers, suppliers or contractors, in any way so as to launder money, finance terrorism or deal with criminal property. You should promptly report any knowledge or suspicion you have in this regard to your supervisor, a Company officer or the General Counsel.

## Political Contributions

You may participate in the political process as individuals on your own time. However, you must make every effort to ensure that you do not create the impression that you speak or act on behalf of the Company with respect to political matters. Company contributions to any political candidate or party or to any other organization that might use the contributions for a political candidate or party are prohibited. You may not receive any reimbursement from corporate funds for a personal political contribution.

## Respect and Courtesy

The Company's policy is to treat one another with respect and courtesy. You should avoid making disparaging comments about others; treating others with respect is critical to the Company's success.

## Diversity and Inclusion

The Company promotes a workplace that values differences and promotes an environment that is inclusive to all people and their diverse abilities. Diversity in the Company's workforce allows the Company to benefit from a multiplicity of viewpoints and relate better to our diverse business partners, clients, and other stakeholders. It is expected that we all:

Help create a Company environment in which all can contribute and develop their talents;

Keep an open mind to new ideas and different points of view; and

Understand that offensive, derogatory and inappropriate messages, remarks, and jokes are never appropriate in the workplace.

## Discrimination and Harassment

We are an equal opportunity employer and will not tolerate illegal discrimination, bias, or harassment of any kind. The Company is committed to providing a workplace free of discrimination and harassment based on race, color, religion, age, gender, national origin, ancestry, sexual orientation, disability, veteran status, or any other basis prohibited by applicable law. Examples include derogatory comments based on a person's protected class and sexual harassment and unwelcome sexual advances. Similarly, offensive or hostile working conditions created by such harassment or discrimination will not be tolerated. You are required to maintain familiarity with the Company's Anti-Harassment Policy. You are encouraged to report any concerns of discrimination, harassment or other violation of the Company's policies, and the Company will thoroughly and impartially investigate all such reports and take all necessary and appropriate remedial actions. For more information, please review the Company's [Anti Harassment Policy](#).

## Health, Safety and Environmental Protection

The Company is committed to managing and operating its assets in a manner that is protective of human health and safety and the environment. It is our policy to comply with both the letter and the spirit of the applicable health, safety and environmental laws and regulations and to attempt to develop a cooperative attitude with government inspection and enforcement officials. You are encouraged to report to your direct manager, the Company's Facilities Manager, the Human Resources department ("HR"), or the Chief Operations Officer ("COO") conditions that you perceive to be unsafe, unhealthy or hazardous to the environment.

To ensure a safe and health work environment, each of us should:

- Fully comply with all environmental and health and safety rules, policies and practices;
- Avoid acting in a way that knowingly or reasonably puts you or others in danger;
- Follow all established safety procedures and promptly report all potentially unsafe actions and conditions;

- Be considerate of the health and safety of others who may be affected by the Company’s work activities and act appropriately to that effect;
- Work to minimize accidents, injuries and illness within the Company by encouraging employees and contractors to follow safe work practices;
- Promptly report all accidents, violations, hazardous material conditions, injuries from government agencies
- Be proactive in helping identify ways the Company can improve its safety;
- Never perform work impaired by alcohol, illegal drugs, or legal drugs that can have a negative impact on the safety of others;
- Never bring firearms or other dangerous weapons onto Company property;
- Report any threats, intimidation, and violence towards anyone at work including business partners; and
- Report any and all safety concerns to the appropriate supervisor.

## Personal Conduct and Social Media Policy

You should take care when presenting yourself in public settings, as well as online and in web-based forums or networking sites. You are encouraged to conduct yourself in a responsible, respectful, and honest manner at all times. We understand that you may wish to create and maintain a personal presence online using various forms of social media. When using personal social media, you may not represent or suggest that your posts are approved, sponsored, or authorized by the Company, or that you are speaking on behalf of the Company. If you are authorized to use social media on the Company’s behalf, you must clearly identify yourself as a Company employee, officer or director, communicating on behalf of the Company and comply with all relevant policies. Viewing, storing, sending or sharing inappropriate, offensive, obscene, harassing, defamatory or sexually explicit content of any type is strictly prohibited. You should be aware that even after a posting is deleted, certain technology may still make that content available to readers.

You are prohibited from using or disclosing confidential, proprietary, sensitive or trade secret information of the Company, its partners, vendors, consultants or other third parties with which the Company does business. Harassment of other directors, officers or employees will also not be tolerated. You may not provide any content to Company social media sites that may be construed as political lobbying or solicitation of contributions, or use the sites to link to any sites sponsored by or endorsing political candidates or parties, or to discuss political campaigns, political issues or positions on any legislation or law.

For more information, please review the Company’s [Social Media Policy](#).

## Preventing Modern Slavery and Human Trafficking

The Company has a zero-tolerance approach to modern slavery servitude, forced or compulsory labor and human trafficking. The Company is further committed to implementing effective systems of controls to ensure modern slavery and human trafficking are not taking place within its own business or in any of its supply chains. It is the Company’s expectation that its suppliers and business partners also conduct themselves in this manner.

The Company is dedicated to ensuring that its supply chains do not rely on or benefit from slavery or human trafficking. To this end, the Company has formulated a code of conduct for its vendors (the “Vendor Code of Conduct”). By establishing our expectations in relation to our business partners and the Vendor Code of Conduct, we seek to implement and maintain a framework of controls to prevent slavery and human trafficking in our supply chains.

The Company is committed to providing the best possible service to its customers and to that end, we select and partner only with reputable and trustworthy business partners and providers. Along with reviewing our business partners' service capabilities, we pay particular attention to their code of conduct (whenever relevant).

The Company carries out risk assessments in relation to its suppliers and seeks to monitor its suppliers' compliance with the Vendor Code of Conduct. The Company will exert efforts to identify potential risks, primarily according to the following principles:

all employment must be voluntary, and there will be no restrictions on workers' voluntarily ending their employment, such as excessive notice periods or substantial fines for terminating their employment contract;

no worker will be forced to make any financial guarantees to secure employment, or make a monetary deposit or surrender any identification document as a condition of employment;

no worker shall be deprived of rights to remove himself/herself from a work situation based on a reasonable justification that the situation presents an imminent and serious danger to his/her life or health, or physically be prevented or delayed from leaving the facility or its grounds except for a reasonable safety reason; and

workers shall be compensated with wages, overtime premiums and benefits that meet or exceed legal requirements or collective agreements, whichever are higher.

The company upholds a strict zero-tolerance policy towards modern slavery, servitude, forced or compulsory labor, and human trafficking. If it is established that any of our suppliers are relying on or benefitting from modern slavery or human trafficking, or otherwise acting in a manner contrary to the principles set forth in this Code, we would take immediate measures with respect to our continuous engagement with such supplier (including the possibility of terminating such relationship) and would comply with any obligations to make any necessary reports to the relevant authorities.

## **Breaches of this Code**

Non-compliance with this Code, including failure to report any known or suspected violation of this Code, may result in discussions between the Company and the non-compliant party (which may ultimately result in the immediate termination of any relationship between the non-compliant party and the Company and/or other disciplinary actions). In appropriate cases, the Company may refer a violation to a regulator or law enforcement.

## **No Rights Created**

This Code is a statement of certain fundamental principles, policies and procedures that govern the Company and you in the conduct of the Company's business. It is not intended to and does not create any rights in any employee, customer, client, visitor, supplier, competitor, shareholder or any other person or entity.

**REVISED: MARCH 27, 2024**