

## GLOBAL-E ONLINE LTD.

# MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

This policy (the "Policy") has been published and is made on behalf of Global-e Online Ltd. (the "Company," "we" or "our").

As a global organization, the Company is committed to high standards of ethical conduct and compliance with applicable laws and, as such, has a zero-tolerance approach to modern slavery servitude, forced or compulsory labour and human trafficking. We are further committed to implementing effective systems of controls to ensure modern slavery and human trafficking are not taking place within our own business or in any of our supply chains. It is our expectation that our suppliers and business partners also conduct themselves in this manner.

This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

### **Business structure and description of supply chain**

The Company operates an end-to-end e-commerce platform and related services to enable and accelerate global, direct-to-consumer cross-border e-commerce. As of 2021, the Company has more than 400 merchants on its platform across diversified verticals and ranging from small, emerging brands to globally-recognized retailers.

Our business partners include technology providers (such as hosting services and data security providers), payment service providers, carriers, customs brokers, and related consultants.

### **Relevant policies**

We are dedicated to ensuring that our supply chains do not rely on or benefit from slavery or human trafficking. To this end, we have formulated a code of conduct for our 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.

### **Due diligence in the supply chain**

Global-e is committed to providing the best possible service to our 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 has overall responsibility for ensuring this Policy complies with its legal and ethical obligations. Management of the Company are given the necessary training in order to understand and comply with this Policy (as discussed further below).

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

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 Policy, we would carefully assess our relationship with that supplier (including options to terminate that relationship) and would comply with any obligations to make any necessary reports to the relevant authorities.

To date, we have received no reports of any incidents relating to modern slavery or human trafficking in our supply chains.

### **Training, reporting, and communication of this Policy**

Each of the Company's employees and directors are required to adhere to the "Code of Conduct and Ethics" (the "Code"). Pursuant to the Code, employees and directors have a duty to report any known or suspected violation of the Code, including violations of the laws, rules, regulations or policies that apply to the Company. Employees are made aware of this through onboarding and through regular training.

Further to the Code, we also ensure that our employees who are involved or engaged with the selection of, or monitoring the performance of, vendors and service providers are aware of any potential risk of modern slavery or human trafficking in our supply chains.

Employees and directors of the Company must immediately report any known or suspected violation of the this Policy, including violations of the laws, rules, regulations or policies related

to the subject matter hereof, to their manager or the Company's General Counsel and are expected to fully cooperate with any investigation the Company may conduct.

**Breaches of this Policy**

Non-compliance with this Policy, including failure to report any known or suspected violation of this Policy, 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).

This Policy has been approved by the board of directors of the Company.

Signed by: .....  
Amir Schlachet, CEO

May 2021