

GLOBAL-E ONLINE LTD.

FAIR DISCLOSURE POLICY

It is the policy of Global-E Online Ltd. and its subsidiaries (“**Global-e** or the “**Company**”) to maintain an active and open public dialogue with shareholders, institutional investors, broker/dealers, and sell-side analysts (collectively, “**Securities Market Participants**”). While the Securities and Exchange Commission’s (“**SEC’s**”) Regulation Fair Disclosure (“**Regulation FD**”) does not apply to Global-e as a foreign private issuer, Global-e is committed to the fair disclosure of information consistent with the spirit of Regulation FD. Regulation FD prohibits the selective disclosure of material nonpublic information to certain enumerated persons and is intended to eliminate situations where a company may disclose important nonpublic information, such as earnings warnings, to securities analysts or selected institutional investors, before disclosing the information to the general public.

For purposes of this policy, “public disclosure” means filing or furnishing a Form 6-K with the **SEC**, or disseminating information through another method (or combination of methods) of disclosure that is reasonably designed to provide broad, non-exclusionary distribution of the information to the public. Global-e has established the following guidelines to avoid selective disclosure of material nonpublic information. This policy should be read in concert with Global-e’s Social Media Policy and Insider Trading Policy, and respective limitations set out therein.

Compliance Guidelines for this Fair Disclosure Policy

Directors, officers and employees of Global-e will not disclose material nonpublic information about Global-e except via a means reasonably designed to provide broad, non-exclusionary distribution to the public (e.g., a press release or Form 6-K).

Information is “material” if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, sell or hold a security. Any information that could reasonably be expected to affect the price of a security is material. Possible material information or events include, but are not limited to:

- earnings information and quarterly results;
- guidance on earnings estimates;
- mergers, acquisitions, tender offers, joint ventures, or changes in assets;
- changes in control of Global-e or changes in senior management;
- new products or developments regarding customers (e.g., the acquisition or loss of a contract);
- changes in auditors or auditor notification that the issuer may no longer rely on an audit report;
- significant events concerning Global-e’s physical assets;
- events regarding Global-e’s securities (e.g., defaults on senior securities, calls of securities for redemption, repurchase plans, stock splits or changes in dividends,



changes to the rights of security holders, public or private sales of additional securities or information related to any additional funding);

- bankruptcies or receiverships;
- regulatory investigations or litigation-related developments involving Global-e; and
- regulatory approvals or changes in regulations and any analysis of how they affect Global-e.

Because this is an area that requires specialized judgment, you should contact Global-e's Compliance Officer if you have questions. For purposes of this Policy, the "**Compliance Officer**" shall be Global-e's General Counsel; provided that if the General Counsel is unavailable, the Compliance Officer shall be Global-e's Chief Financial Officer ("**CFO**").

"Nonpublic" information is information that is not generally known or available to the public. Information is considered publicly available, and thus public, only when it has been released in a manner that would result in its widespread dissemination and the investing public has had time to absorb the information, typically 1 or 2 business days.

If any director, officer or employee believes that material nonpublic information may have been selectively disclosed, that individual should contact the Compliance Officer immediately. The Compliance Officer will determine the appropriate public disclosure, if any, that will have to be made in accordance with SEC rules and regulations and this policy.

Public Posting

Global-e will post this policy statement on its website at www.global-e.com and update it as necessary to ensure that Securities Market Participants are informed about Global-e's disclosure policy.

Authorized Representatives of Global-e

Persons authorized to communicate on behalf of Global-e to Securities Market Participants are limited to the Chief Executive Officer (the "**CEO**"), the CFO, the Chief Revenue Officer (the "**CRO**") and representatives of the Investor Relations Department; or other persons specifically designated by them to speak with respect to a particular topic or purpose (each, an "**Authorized Person**"). Individual members of the board of directors will not communicate with Securities Market Participants other than through, or with the consent of, the Chairperson (or lead independent director, if applicable). From time to time, the CEO, the CRO or the CFO may designate other persons authorized to communicate on behalf of Global-e with Securities Market Participants.

In addition, the CFO, the General Counsel, members of the CFO's staff and other persons designated by the CFO or General Counsel are authorized to communicate with employee shareholders and beneficial owners in response to inquiries regarding employee shareholder accounts and other administrative matters.

It is Global-e's policy that, except as specified under (a) and (b) above, employees shall not communicate with Securities Market Participants, and should refer all questions to the CFO or



other Authorized Person including representatives of the Investor Relations Department. Any reference to “employees” in this policy also relates to officers and contractors of Global-e.

In order to ensure that complete and accurate information is obtained, Securities Market Participants should be and are instructed to direct all inquiries regarding Global-e’s financial condition, results of operations, strategies and other similar matters, to the CFO. Statements by employees or agents who are not Authorized Persons should not be relied upon.

Quarterly Earnings Release Conference Calls and Updates

Global-e will hold quarterly investor conference calls open to the public and media and provide advance notice of the call through a press release or other means of widespread public dissemination. Before the conference call, Global-e will distribute publicly its quarterly or annual earnings release. Global-e will also furnish its quarterly or annual earnings release with the SEC on Form 6-K.

Playback of the conference call will be provided on Global-e’s website after the conference call for 30 days.

To the extent that Global-e provides guidance relative to its financial goals, all guidance, and changes to or affirmations of guidance, will be provided through public disclosure. Any change to guidance practices will be announced in the same manner in which Global-e provides guidance. Global-e will not subsequently affirm previously-released earnings guidance, if any, or comment on current quarter or annual performance except through public disclosure.

As needed, from time to time, Global-e may hold investor conference calls open to Securities Markets Participants and will provide public notice about the call through public disclosure.

Quiet Period

Other than broad, non-exclusionary distribution to the public (e.g., a press release or Form 6-K), Global-e will observe a “quiet period,” during which Global-e shall not comment on its earnings estimates or other prospective financial results for the applicable period. The quiet period will begin one month prior to the end of the quarter and continue until Global-e’s earnings information for the applicable period is made public.

Analyst Models and Reports

Analyst reports and earnings models may only be reviewed to correct errors that can be corrected by referring to publicly available, historical, factual information or to correct any mathematical errors. No other analyst feedback or guidance on earnings models may be communicated to an analyst.



No Company employee should distribute copies of, or refer to, selected analysts' reports to anyone outside Global-e. This is consistent with Global-e's intention not to adopt any particular analyst report.

Communications and Meetings

It is Global-e's policy that, to the extent practical, at pre-scheduled meetings and conference calls with Securities Markets Participants, at least one Authorized Person and another representative of Global-e will be present.

Global-e may participate from time to time in securities firm-sponsored and other investor and industry conferences. The CFO or a representative of the Investor Relations Department shall pre-approve Global-e's participation in these conferences. It will be Global-e's practice to publicly announce its participation in such conferences.

Global-e will not intentionally disclose any material, non-public information during said meetings, conference calls, conferences or such other communications, unless such disclosure is made in advance or simultaneously on a widespread basis and with adequate prior notice. If Global-e unintentionally discloses material non-public information during said meetings, conference calls, conferences or such other communications, Global-e will make the appropriate public disclosure, if any, that is required under applicable SEC rules and regulations and this policy.

Although Global-e recognizes that Regulation FD does not apply to communications with the media nor to it as a foreign private issuer, it is Global-e's policy to publicly disclose material information before discussing such material with individuals representing the media.

Television, Radio and Online Broadcasting Appearances

All requests to conduct business-related television, radio or online broadcasting programs, or to appear as a guest on such programs, must be approved in advance by the CEO or CFO. Broadcast activities that are a part of an approved marketing effort do not need to be approved in advance.

Online Chat Rooms, Forums and Social Media Platforms

Global-e may monitor what others are saying about Global-e in online chat rooms, forums and social media platforms. However, Global-e generally will not respond to any business-related rumors or correct any inaccuracies that might appear unless required to do so by law or by regulators.

Commenting on Rumors



Global-e has a policy of not responding to business-related rumors absent a legal duty to do so. Whether or not the rumor has any basis in fact, Global-e normally will respond by saying: "Our policy is not to comment on business-related rumors or speculations." Like most companies, Global-e follows this approach consistently in order to avoid providing an implied confirmation or denial in other circumstances. Exceptions to this policy must be approved by the CEO or CFO.

Use of Safe Harbor Language

Global-e will use safe harbor language with respect to forward-looking statements about financial performance at the beginning of quarterly conference calls with the investment community and whenever its representatives speak with analysts or investors. Safe harbor language is also incorporated in all of Global-e's written investor relations documents.

Further Information about this Policy

All inquiries regarding the provisions or procedures associated with this policy should be addressed to the Compliance Officer.

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Last amended: March 2021

