

## GLOBAL-E ONLINE LTD.

### VENDOR CODE OF CONDUCT

Global-E Online Ltd. ("Global-e") strives to achieve the highest standard of business and professional integrity, and seeks to avoid even the appearance of improper behavior. We expect our vendors, suppliers, distributors, partners, business associates, and third party representatives ("**Vendors**") to uphold these standards of conduct and professional integrity and communicate them to their organization.

Global-e endeavors to provide the highest quality service to our customers and thus we expect our Vendors to support us in this mission.

**This Vendor Code of Conduct ("Code") sets forth Global-e's expectation that its Vendors uphold the highest standards of ethics and comply with all applicable laws and regulations.** These expectations should complement each Vendor's own company policies, applicable legal requirements, and the terms of any agreements that a Vendor may have with Global-e. Failure to comply with this Code could result in termination of the business relationship. Global-e encourages Vendors to raise questions or concerns about this Code to their Global-e point of contact.

Global-e's Code of Ethics and Conduct, which sets forth our compliance standards in more detail, is available at <https://investors.global-e.com/corporate-governance/documents-charters>

Global-e expects its Vendors to be honest, ethical and transparent when dealing with Global-e, its employees, customers and other third parties.

Vendors are expected to monitor Vendors own compliance with this Code and report any integrity concern or violations of this Code or otherwise involving or affecting Global-e. When requested, Vendors are expected to assist Global-e in investigating concerns.

#### **Compliance with Applicable Governmental Laws, Rules, and Regulations**

Vendors are expected to comply with all laws, rules and regulations that apply to the Vendor's business, particularly those related to Vendor's performance of duties for Global-e, including dealing with customs authorities in connection with performing customs clearance.

#### **Anti-Corruption Compliance & Business Expenses**

Vendors are expected not to directly or indirectly offer, give, authorize, promise, solicit or accept in any way related to Global-e, bribes, kickbacks, or other improper or illegal payments of anything of value, whether it involves public officials (including officers or employees of governments or state-owned entities) or private parties.

Vendors should not partake in bribery to influence a public official, to obtain or retain business from any party, or to secure an unfair business advantage.

Vendors should not make facilitation payments, or small, unofficial payments to public officials to expedite routine, non-discretionary government processes or decisions (even if permissible under local law).

All business expenses provided by Vendors related to Global-e's business – including gifts (whether money or any other thing of value), hospitality, entertainment, events, travel, or accommodation – must comply with any agreements with Global-e; have a legitimate business purpose; be reasonable and modest in value and frequency; comply with local law; and be accurately recorded. Global-e prohibits the provision of cash gifts.

### **Export, Customs, Trade Control, and Anti-Money Laundering**

Vendors are expected to comply with all applicable export, customs, and trade control laws and regulations, including economic and trade sanctions laws, antiboycott laws, and any related licensing requirements, as well as Global-e's Trade Controls Policy.

Vendors are expected to comply with all applicable anti-money laundering laws and regulations.

### **Conflicts of Interest & Corporate Opportunities**

Vendors should avoid actual or potential business or financial conflicts of interest – i.e., instances where the Vendor's personal interests (including interests of the Vendor itself or the Vendor's employees, officers, or directors) interfere or appear to interfere with Global-e's interests.

Vendors are prohibited from directly or indirectly (a) taking personally for themselves opportunities that are discovered through the use of Global-e property, information or positions; (b) using Global-e property, information or positions for personal gain; or (c) competing with Global-e for business opportunities.

- Any actual or potential conflicts of interest must be immediately reported to Global-e.

### **Insider Trading**

As a Vendor of Global-e, you may have access to material non-public information about Global-e, other companies, or their respective subsidiaries.

Vendors may not trade or advise others to trade securities, directly or indirectly, while in possession of "material nonpublic information" about an issuer, including Global-e. Information is material if it could reasonably be expected to affect the judgment of investors regarding whether or not to buy, sell, or hold the securities in question.

Vendors should not engage in "tipping" others (e.g., family or friends) regarding material nonpublic information about securities.

### **Antitrust, Competition, and Fair Dealing**

Vendors are expected to comply with applicable antitrust and competition laws designed to promote fair and open competition, particularly as it relates to Global-e.

Vendors should 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.

Vendors are expected to deal fairly with customers, service providers, suppliers, competitors and employees.

Vendors should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

### **Record Management and Recording Transactions**

Vendors are expected to ensure that all financial books, records and accounts related to their relationship with Global-e accurately reflect transactions and events.

Vendors should not falsify documents, transactions, or accounting records.

### **Confidential Information**

Vendors are expected to safeguard and protect Global-e's confidential information, as well as the confidential information of Global-e's customers, suppliers, shareholders, Global-e employees, or other third parties. Confidential information should be interpreted broadly to include all non-public information relating to Global-e or other companies that would be harmful to the relevant company (or useful to competitors) if disclosed.

Vendors should not misuse proprietary information or trade secret information that was obtained without the owner's consent; or from using confidential information for personal gain.

### **Data Privacy**

Vendors should comply with all applicable laws and regulations regarding the protection of personal information or other sensitive or protected information, and assist Global-e in complying with its own obligations in this regard

Vendors' privacy policies and notices should accurately reflect the data processing activities carried out by the Vendor, and should at all times be consistent with the processes by which data flows between Vendors and Global-e.



Vendors are expected to notify Global-e immediately in the event of an actual or suspected data breach resulting in the dissemination of personal information relating to Global-e or its subsidiaries, customers, management, employees or other related parties.

Vendors are expected to review and comply with Global-e's Privacy Policy available at <https://www.global-e.com/privacy-policy/>.

### **Human Rights, Employee Relations and Non-Discrimination**

Vendors are expected to comply with all applicable human rights laws prohibiting child, forced, indentured, or involuntary labor.

Vendors are expected to pay wages in compliance with applicable minimum wage laws, respect maximum working hour standards and provide benefits in compliance with all applicable laws.

Vendors are expected to conduct themselves in a professional manner with courtesy and respect for others. Global-e will not tolerate harassment by our Vendors in any form, including verbal, physical, or sexual harassment.

Global-e is committed to providing equal opportunities in employment, development, and advancement for all qualified persons and to promoting diversity and inclusion – and our Vendors are expected to share that commitment. Global-e does not tolerate illegal discrimination by its Vendors.

### **Environment, Safety, and Health**

Vendors are expected to operate in a manner protective of human health, safety, and the environment, especially as it relates to Vendors work with Global-e.

Vendors are expected to comply with applicable health, safety and environmental laws and regulations, as well as Global-e's ESG policy available <<<here>>>.

### **Marketing Materials and Media Interaction**

Vendors may not, without the explicit written consent of Global-e's CEO, CFO, General Counsel or CRO, disseminate marketing materials or press releases, participate in media interviews or make other public disclosures that include a reference to Global-e, its subsidiaries, its customers or the services rendered by such Vendor, except as required by applicable law.

### **Use and Protection of Global-e Corporate Assets**

If provided with Global-e assets (including technology, software, proprietary information, or other physical assets), Vendors are expected to protect these assets and ensure their efficient use for legitimate business purposes