



# commercetools

*Next generation commerce*

## Global Modern Slavery and Human Trafficking Policy

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<b>Version</b>	1.0
<b>Last change</b>	17.04.23
<b>Publisher</b>	commercetools - legal - compliance



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## The aim of this policy

Here commercetools fulfils his legal obligations according to the Modern Slavery Acts of the United Kingdom and Australia.

## Scope

**Valid:**

17.04.2023

**Legal entities**

All entities within the commercetools Group

**Business divisions**

commercetools Group

**addressee**

Every employee of the commercetools group, including Board of Directors, Management and Executives as well as freelancer and contractors when they act on behalf of commercetools.

**country**

Global

International

Nur national (DE)

## Imprint

**publisher**

commercetools GmbH

Legal Team

Compliance Manager

**contact**

[compliance@commercetools.com](mailto:compliance@commercetools.com)

## document history

**version**

1.0

**change**

Drafted - CM



# Modern Slavery Statement

## Introduction

This Modern Slavery and Human Trafficking Statement (“Statement”) addresses the reporting requirements set out in section 54(1) of the United Kingdom Modern Slavery Act of 2015 (the “Modern Slavery Act 2015”) and the Australian Modern Slavery Act 2018 (the “Australian Act”). The Modern Slavery Act 2015 and Australian Act require certain businesses to disclose their modern slavery risks and efforts to mitigate those risks in their operations and supply chains. This policy also takes into consideration obligations under the California Transparency in Supply Chains Act and the German Supply Chain Evidence Act.

This Statement is given on behalf of commercetools GmbH and its subsidiaries (collectively, “commercetools”). commercetools is committed to complying with modern slavery laws and effectively managing its modern slavery risks. commercetools strives to act ethically and with integrity in all of its business relationships, which means that commercetools takes great effort to implement and enforce effective systems and controls, including those that would address the risks of modern slavery practices occurring in commercetools's operations or supply chain. In this Statement, the collective expressions 'commercetools', 'we', 'us' and 'our' are used conveniently to refer to commercetools GmbH and its subsidiaries. This is because, in relation to modern slavery risk assessment and management, we operate using group-wide policies and procedures. It is not intended to convey how we are structured, managed or controlled.

## Organisational Structure and Operations

commercetools is a Munich-based technology company that provides highly customizable, cloud-based commerce solutions, used to deploy commerce applications for its customers such as commercetools Composable Commerce, commercetools Frontend and other products that may be made available by commercetools and its affiliates from time to time. commercetools has operations through its subsidiaries and various regional offices in a number of markets throughout the world.

commercetools operates in the United Kingdom through its subsidiary commercetools Ltd. and in Australia through its subsidiary commercetools AU Pty Ltd.

## Operations and Risks

Overall, due to the nature of commercetools's business as a developer and provider of a software solution, commercetools considers itself to be low risk with respect to modern slavery practices in its operations. This is based on an assessment of commercetools's geographical



footprint against the Global Slavery Index's list of high, medium and low risk countries. commercetools primarily operates in lower geographic risk countries and regions, including in the United States, Europe, Australia and Singapore.

commercetools's workforce is primarily made up of skilled full-time permanent employees, which further supports our low-risk status. commercetools does, however, engage some contractors, which is addressed further below.

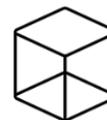
## Supply Chain and Risks

commercetools's suppliers primarily provide us with software, software-as-a-service, professional services, and finished physical products, such as computer hardware, office equipment, and related goods. commercetools does not directly manufacture goods, supplies or physical products.

Overall, due to the nature of commercetools's software business and taking into account modern slavery risk factors, commercetools considers itself to be low risk with respect to slavery and human trafficking issues in its supply chain. However, commercetools recognizes that risks of modern slavery and human trafficking can exist for global organisations, especially with regards to supplies to the IT and software sector linked to electrical product manufacturing, which is a known high-risk sector.

Although some of the goods and services that commercetools procures may be higher risk including computer hardware, cleaning services, security, telecommunications and other contractor services, commercetools strives to source goods and services from reputable third parties, and we continue to enhance our supply chain selection and management processes with these risks in mind. commercetools's suppliers and partners are predominantly based in the United States and Europe and are mostly technology and services providers. Only a very small percentage of commercetools's suppliers provide hardware, and those vendors are also typically large, multinational companies, with their own company codes of conduct, often including human rights commitments. Our technology and services providers include the likes of Amazon.com, Inc., Google LLC, Salesforce.com, Inc., and Microsoft Corporation, each of which have stated codes of conduct and ethics.

Additionally, commercetools generally uses placement and recruiting agencies to source independent contractors for its workforce, and these agencies are selected following a standard sourcing process. All workers employed by commercetools and its suppliers are subject to background checks, as allowed under applicable local law. commercetools requires its suppliers to adhere to applicable laws, including employment laws related to child labour, wages, working hours, and working conditions. Further, if commercetools learns that any party has acted in a manner inconsistent with its ethical standards, commercetools will take appropriate action.



## commercetools Policies and Values

commercetools believes that its corporate culture has been a critical component to its success. commercetools has invested substantial time and resources in building its team and ensuring that the type of people it employs or works with have high moral standards and integrity. In its offices worldwide, commercetools's workforce celebrates diverse perspectives and unique identities, respects each other, and makes a real impact every day. commercetools ensures that the highest level of integrity is maintained throughout all areas of its business.

commercetools's employees and contractors are also required to adhere to a Code of Conduct. All employees complete training when they join us and at least annually thereafter to ensure they remain aware of and agree to comply with our Code and other applicable policies and procedures. The Code reflects the business practices and principles of behaviour that supports our values and is reviewed for any necessary updates regularly. Among other things, the Code sets forth guidelines regarding:

- honest and ethical conduct;
- legal compliance;
- international business laws;
- conflicts of interest;
- fair dealings; and
- compliance standards and procedures.

The Code also includes mechanisms for dealing with violations, encouraging reporting and redressing concerns.

commercetools's suppliers are separately required to adhere to our Vendor Code of Conduct. The Vendor Code of Conduct outlines that commercetools will not tolerate any human rights abuses or offences (including those relating to modern slavery) by our vendors or their affiliates, employees, agents, or subcontractors. The Vendor Code of Conduct further states that vendors must regularly review their employment practices and perform due diligence to ensure against modern slavery and human trafficking in their own supply chains. The Vendor Code of Conduct also provides contact details for suppliers to report concerns and commercetools promptly investigates all matters submitted and responds appropriately.

In accordance with these guidelines and values, commercetools aims to ensure that it hires and works with people who portray high ethical standards and integrity that would have zero tolerance towards any sort of modern slavery or human trafficking.

commercetools strives to act ethically and with integrity in all its business relationships, which means that commercetools takes great effort to implement and enforce effective systems and



controls, including those that would prevent slavery and human trafficking from existing in any part of commercetools's business or supply chains, as described further below.

## Controls and Due Diligence Processes

To ensure all those in commercetools's supply chains and contractors comply with commercetools's values, commercetools enters into appropriate agreements with its suppliers and partners. As part of this, commercetools requires suppliers and partners to comply with all applicable laws, which includes the Modern Slavery Act 2015 and the Australian Act. commercetools also may require certain suppliers and partners to adhere to the Code, or to certify that they have implemented a code of conduct with substantially the same effect.

commercetools believes that no individual should be subjected to any form of modern slavery and commercetools will continue to review its processes to take necessary steps within its power to prevent this from existing within its business and supply chains. commercetools is committed to engaging with and educating its suppliers and workforce regarding modern slavery risk identification and mitigation.

A component of commercetools's growth strategy involves the further expansion of its operations and customer adoption internationally. Operating in international markets requires significant resources and management attention and subjects commercetools to regulatory, economic, and political risks that are different from those in Germany. commercetools regularly keeps up to date with changing legislation and keeps its employees informed through appropriate training and updates.

## Assessing the Effectiveness of our Actions

commercetools recognizes the importance of reflecting on and assessing the effectiveness of our efforts to address modern slavery risk. commercetools regularly evaluates processes to determine whether it would be appropriate to adopt further policies or procedures, or join related third-party organisations, each in light of the goal of effectively addressing the risk of modern slavery practices in our operations and supply chains.

## Governance

To ensure that commercetools is successful in continuing to implement the foregoing efforts, commercetools's Legal and Compliance team oversees program responsibilities, which include:

- investigating possible violations;
- requiring contractors and vendors to alert the company and relevant authorities of possible violations;
- training new employees;



- conducting regular training sessions to refresh employees' familiarity;
- updating policies as needed and alerting employees to any updates; and
- otherwise promoting an atmosphere of responsible and ethical conduct.

commercetools has zero tolerance to inaction in relation slavery and human trafficking. To ensure all those in our supply chain and contractors comply with commercetools's values, commercetools has in place mechanisms for our employees, suppliers, and third parties to ask questions or to report concerns about possible violations of commercetools's policies and applicable laws, including those related to modern slavery.

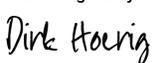
## Looking Ahead

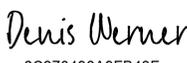
Compliance with the Modern Slavery Act 2015 and the Australian Act is an ongoing commitment. As an organisation, commercetools is continuing to develop the way it works to ensure that modern slavery risks are effectively identified and managed throughout our operations and supply chains. Going forward, we intend to continue to engage with key suppliers to improve modern slavery risk awareness, review relevant policies and explore opportunities for collaboration and partnerships to combat modern slavery.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and section 13 of the Australian Act and constitutes commercetools's slavery and human trafficking statement for the financial year ending 31 December 2023.

This statement was signed and approved on 17.04.2023.

## Signature

DocuSigned by:  
  
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Dirk Horig, CEO

DocuSigned by:  
  
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Denis Werner, COO