

Modern Slavery and Human Trafficking Statement for commercetools

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The Aim of This Policy

This Modern Slavery and Human Trafficking Statement ("Statement") aims to fulfill commercetools' legal obligations under the UK Modern Slavery Act 2015, the Australian Modern Slavery Act 2018, and relevant U.S. legislation, including the California Transparency in Supply Chains Act. It outlines the measures commercetools GmbH and its subsidiaries (collectively "commercetools") take to mitigate the risks of modern slavery and human trafficking within our operations and supply chains.

Scope

This Statement applies to all entities within the commercetools Group globally, including employees, contractors, and supply chain partners. It covers all business divisions and operations of commercetools worldwide.

Imprint

Publisher: commercetools GmbH
Contact: compliance@commercetools.com
Policy Number: ct_global_03
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Introduction

This Modern Slavery and Human Trafficking Statement ("Statement") is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and Section 13 of the Australian Modern Slavery Act 2018 ("the Acts"). It outlines the steps taken by commercetools GmbH and its subsidiaries (collectively "commercetools") to identify, mitigate, and prevent modern slavery and human trafficking risks within its business operations and supply chains during the financial year ending 31 December 2024.

Organisational Structure and Business Overview

commercetools is a Munich-based technology company that specializes in highly customizable, cloud-based commerce solutions. With operations in regions including the United Kingdom, the United States, Europe and Australia, and Singapore, commercetools' offerings include commercetools Composable Commerce, commercetools Frontend, and other innovative software solutions. commercetools employs a diverse, highly skilled workforce and partners with reputable vendors worldwide to deliver its services.

Our Commitment to Ethical Practices

At commercetools, we are committed to conducting business with integrity, transparency, and accountability. We strictly prohibit all forms of modern slavery and human trafficking within our operations and expect the same standards from our suppliers and partners. This commitment is underpinned by our Company Code of Conduct and Vendor Code of Conduct, which outline expectations regarding ethical business practices, human rights, and sustainability.

Risk Assessment and Mitigation

While the risk of modern slavery within our operations is assessed as low, given our predominantly skilled workforce and the nature of our business, we remain vigilant in identifying and addressing potential risks. Areas of higher vulnerability include the procurement of physical

products such as computer hardware and contracted services like cleaning and security. To mitigate these risks, commercetools:

- Sources goods and services from reputable vendors, prioritizing those with robust human rights commitments.
- Conducts vendor assessments and due diligence during supplier onboarding and periodically thereafter.
- Engages with suppliers located predominantly in low-risk regions, including Europe and North America.

Policies and Procedures

To ensure alignment with modern slavery legislation and ethical standards, commercetools has implemented the following policies:

1. Code of Conduct: Mandates compliance with ethical business practices and international laws.
2. Vendor Code of Conduct: Requires suppliers to avoid human rights violations, perform regular due diligence, and report concerns.
3. Whistleblower Policy: Provides secure and anonymous channels for employees, contractors, and third parties to report unethical practices, including modern slavery.

Training and Capacity Building

All employees and contractors complete mandatory training on ethical conduct and modern slavery upon joining commercetools, with annual refreshers to maintain awareness. Key procurement and compliance staff receive specialized training to identify and mitigate risks associated with modern slavery.

Governance and Accountability

commercetools' Legal and Compliance Team oversees adherence to modern slavery policies and practices. Responsibilities include:

- Investigating suspected violations.
- Updating policies and training materials.
- Monitoring supplier compliance through audits and assessments.

Assessing Effectiveness

To measure the effectiveness of our actions, commercetools:

- Reviews supply chain assessments and compliance reports.
- Engages third-party audits for high-risk suppliers as needed.
- Monitors progress through key performance indicators, including supplier adherence to ethical codes and employee training completion rates.

Continuous Improvement

We recognize that combating modern slavery is an ongoing process. commercetools is committed to:

- Enhancing supplier engagement to address modern slavery risks.
- Exploring partnerships with external organizations to support best practices.

- Reviewing and updating policies to align with evolving legislation and industry standards.

Report

Each of us is responsible for detecting and reporting violations of this Statement. Any suspicion of a breach of the rules or other issues that may constitute a breach of this policy should be reported as soon as possible. If you are unsure whether a particular action or treatment may constitute a breach of the rules, please raise this so that it can be investigated further by commercetools.

Reports can be made to any member of the Compliance Team. To report a possible violation to the Compliance Team, use compliance@commercetools.com. Reports will be entered directly into the Compliance Team's mailbox.

Anonymous reports

If you would like to make an anonymous report, you can do so using our web platform at the following link: <https://commercetools.com/compliance>. If you use this option, please follow the instructions at this webpage.

We will also follow up on these reports with the appropriate care.

Approval

This Statement has been reviewed and approved by the Board of Directors of commercetools GmbH.