

# Anti-Modern Slavery and Human Trafficking Statement

This Anti-Modern Slavery and Human Trafficking Statement (the "**Statement**") describes the actions taken by Shopify Inc. (the "**Company**" or "**Shopify**") and its Reporting Subsidiaries, as defined below (collectively referred to as the "**Shopify Group**") during the financial year<sup>1</sup> ended on December 31, 2023 ("**FY23**") to prevent modern slavery including slavery, servitude, forced or compulsory labour, child labour, and human trafficking (collectively, "**Modern Slavery**") within the Shopify Group's operations and supply chains. This Statement is made in compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023 (Canada), the *Modern Slavery Act 2015* (United Kingdom), and the *Modern Slavery Act 2018 (Cth)* (Australia).

Shopify Reporting Subsidiaries	Principal Activities
<b>Canada</b>	
Shopify Inc. <sup>2</sup>	Shopify Inc. is incorporated under the federal laws of Canada and is the ultimate parent company of the Shopify Reporting Subsidiaries
<b>United Kingdom</b>	
Shopify UK Limited	A private limited company incorporated in England and Wales and a wholly owned subsidiary of Shopify
Shopify International Limited	A private limited company incorporated in Ireland and a wholly owned subsidiary of Shopify
<b>Australia</b>	
Shopify (Australia) Pty Ltd.	A proprietary company limited by shares incorporated in Australia and a wholly owned subsidiary of Shopify
On Technology Pty Limited	A proprietary company limited by shares incorporated in Australia and a wholly owned subsidiary of Shopify
Shopify Commerce Singapore Pte Limited	A private limited company incorporated in Singapore and a wholly owned subsidiary of Shopify, registered as a foreign company in Australia

Shopify Inc., as the principal governing body of the Shopify Group, is submitting this joint Statement on behalf of itself and its Reporting Subsidiaries. This Statement has been prepared by Shopify in consultation with the directors of its Reporting Subsidiaries, as applicable. Shopify also has wholly-owned subsidiaries outside of the United Kingdom and Australia, which are not Reporting subsidiaries. The information contained in this Statement generally applies to the Shopify Group unless otherwise indicated.

<sup>1</sup> The term "financial year" in this context refers to the financial year ended December 31, the financial year for Shopify Inc.

<sup>2</sup> Shopify Inc. is the only entity included in this report with reporting obligations under *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023 (Canada).

## STRUCTURE, ACTIVITIES, OPERATIONS AND SUPPLY CHAINS

### ***Structure***

Established in 2004, Shopify Inc. is a public company listed on both the New York Stock Exchange and the Toronto Stock Exchange (TSX & NYSE: SHOP). Shopify provides commerce software and solutions, offering trusted tools to start, scale, market, and run a business of any size. Shopify makes commerce better for everyone with a platform and services that are engineered for simplicity and reliability, while delivering a better shopping experience for consumers everywhere.

Shopify's registered office is located in Ottawa, Canada and, as of December 31, 2023, the Company had over 8,000 employees and contractors, working in a remote-first model. While the workforce is global, the majority of these employees and contractors are based in Canada and the United States. Shopify also has employees in Australia and the United Kingdom. Subsidiaries within the Shopify Group generally adhere to policies and processes established by Shopify Inc. and share centralised procurement, finance, legal, and other company resources.

### ***Activities and Operations***

Shopify generates revenue through subscriptions to its commerce platform and additional solutions that merchants using the platform add to enhance platform functionality. Shopify's merchant solutions include point-of-sale ("**POS**") hardware, which Shopify sells to its merchants. Certain of the hardware products that Shopify offers for sale are designed and contracted to be manufactured by Shopify on behalf of the Shopify Group.

### ***Supply Chains***

Shopify's supply chain is primarily composed of the following three streams:

- Third-party service providers, including partners, professional services, and software vendors ("**Third Party Service Vendors**");
- Certain goods for ongoing business operations ("**Business Operations**"), which include furniture and office equipment and food and beverage services; and
- Hardware products that are sold to merchants as part of Shopify's suite of product offerings ("**Hardware Products**"). These hardware products include Shopify's POS Terminal and POS Go devices, Tap & Chip reader, WisePad 3 card reader, barcode scanners, label printers, and other devices and related accessories used for in-person retail sales.

## RISKS OF MODERN SLAVERY PRACTICES IN OPERATIONS AND SUPPLY CHAINS

In 2023, the steps taken by Shopify to assess the risk of Modern Slavery in its supply chains and operations included considering the latest governmental advice and guidance, and

conducting a risk-based assessment of its operations and supplier base with a specific focus on third-party manufacturers of Hardware Products.

### ***Potential Risks in Shopify Group's Operations***

Shopify considers the overall risk of Modern Slavery occurring within the operations of the Shopify Group to be low. Geographically, the Shopify Group's workforce and activities are primarily based in North America and Western Europe, which are regions that pose a lower risk of Modern Slavery.<sup>3</sup>

### ***Potential Risks in Shopify Group's Supply Chains***

Overall, given the nature of its business and industry, Shopify considers its Third-Party Vendors and Business Operations supply chains to pose a low risk of Modern Slavery. The majority of Shopify's Third-Party Vendors and Business Operations supply chains are based in Canada or the United States, where the labour environment is well-regulated.<sup>4</sup>

Shopify relies on third parties to manufacture and/or supply Hardware Products. These third parties generally have operations based outside of North America and certain suppliers are located in regions with historically less robust regulation in the labour context. While Shopify expects its direct suppliers to comply with all applicable laws, including those related to labour, health and safety, human rights, and business ethics, the risk inherent to complex global supply chains is that there is less visibility into the operations of sub-suppliers several levels down the supply chain. To mitigate the potential risks associated with this reduced visibility, in instances where suppliers operate in regions or industries that are considered to be higher risk, Shopify considers appropriate additional diligence measures, as further described below.

To date, Shopify has not identified any instances of Modern Slavery in its supply chains or operations. Accordingly, no remedial steps were deemed necessary, including those related to the remediation of income loss to the most vulnerable families that results from remediation measures

## **ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS**

### ***Policies***

Shopify's Code of Conduct underscores the Company's commitment to the highest standards of honest and ethical behaviour. It sets out Shopify's fundamental values and standards of behaviour expected from all Shopify board members, employees, consultants, and contractors. The Code of Conduct requires compliance with all applicable laws, including those relating to

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<sup>3</sup> In accordance with the [Global Slavery Index](#), ranking more than 160 countries, North America, and Western Europe have some of the lowest rates of Modern Slavery.

<sup>4</sup> Government response to Modern Slavery, presented as a percentage, is assessed at 60/100 for Canada and 67/100 for the United States. Higher percentage reflects more action being taken.

<https://www.walkfree.org/global-slavery-index/map/#mode=map:map=prevalence:year=2023:view=countries>

Modern Slavery, and provides a mechanism for reporting violations, prohibiting retaliation for reporting or participating in investigations. Shopify's Code of Conduct is publicly available and routinely reviewed and updated to promote relevance and compliance with applicable legal standards. All new employees undergo training and certification on the Code of Conduct when they join the Company and training, acknowledgement, and a commitment to the Code of Conduct is also required on an annual basis.

Shopify also maintains a whistleblower hotline, a confidential platform to report potential violations of laws, regulations, or industry standards including breaches of the Company's Code of Conduct.

### ***Contractual Provisions and Due Diligence***

Shopify's standard supplier agreements include clauses that require suppliers, including suppliers of Hardware Products, to comply with applicable laws and to indemnify Shopify for noncompliance, which includes laws related to force labour, as applicable. Shopify's standard form agreements also include audit rights to ensure suppliers are complying with the terms of the agreement, including rights to inspect records, documents, and activities related to the agreement. Additionally, provisions in agreements with direct suppliers of Hardware Products generally provide Shopify the ability to conduct inspections at supplier facilities before accepting goods. Shopify may also undertake additional diligence of suppliers operating in areas of its supply chains that are considered higher risk, specifically for Hardware Products. Such diligence may include additional certifications and site visits.

### ***Board Oversight and Governance***

Shopify's Board of Directors and its Committees, as applicable, oversee the Company's Code of Conduct, risk management practices, and strategies to mitigate risk, which includes risks of Modern Slavery, including child and forced labour.

Additional information pertaining to Shopify's corporate governance structure is available on the Governance section of the Company's Website and in public filings with Canadian and U.S. securities regulators.

### ***Training***

All Shopify employees receive annual training on the Code of Conduct, as outlined above. Shopify will continue to evaluate additional training on identifying and mitigating the risk of Modern Slavery within the Company's supply chains, as appropriate.

## **ASSESSING EFFECTIVENESS**

Shopify recognizes and understands the importance of the laws regarding Modern Slavery and is committed to reviewing and assessing the Modern Slavery risks in its supply chain. The

Company plans to continue to assess risks related to Modern Slavery regularly and evaluate policies and working practices accordingly. This assessment will be done in consultation with appropriate stakeholders and through discussions with management.

## APPROVAL AND ATTESTATION

### *Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, S.C. 2023*

This Statement was approved by the Board of Directors of Shopify Inc. via written resolution on April 19, 2024.

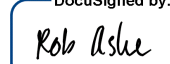
For the purposes of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023 (Canada) (the “Act”) the approving Board member confirms in respect of Shopify Inc. that *In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.*

### *Australian Modern Slavery Act 2018 (Cth)*

This joint statement was approved by the Board of Directors of Shopify Inc. in their capacity as principal governing body (as defined by the *Modern Slavery Act 2018 (Cth)* (Australia)) of the applicable Reporting Subsidiaries under the *Modern Slavery Act 2018 (Cth)* (Australia)).

### *Modern Slavery Act 2015 (United Kingdom)*

This joint statement was approved by the Board of Directors of Shopify International Limited on its behalf and on behalf of Shopify UK Limited as its parent company pursuant to the *Modern Slavery Act 2015* (United Kingdom). The Board members for Shopify UK Limited have also reviewed and approved the information contained in this joint statement.

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Robert Ashe

Lead Independent Director, Shopify Inc.

Date: April 23, 2024

I have the authority to bind Shopify Inc.

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089C401980A9406

Caroline Kiduff

Shopify International Limited

Date: April 25, 2024