



**Modern Slavery Report**  
**of WeCommerce Holdings LP**  
**For the fiscal year ended December 31, 2023**  
**Dated as of May 31, 2024**

## **Introduction**

WeCommerce Holdings LP (“WeCommerce”) is pleased to present its first forced labour and child labour report (the “Report”) covering the fiscal year ended December 31, 2023 (the “Reporting Period”). This Report is pursuant to sections 11(1) and 11(3) of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Modern Slavery Act” or the “Act”).

This Report outlines the efforts and actions WeCommerce has taken during the Reporting Period to identify and understand the risk of forced labour and child labour in its operations and supply chain and to strengthen its controls to reduce and mitigate these risks.

WeCommerce is committed to doing business ethically and takes a zero-tolerance approach to all forms of modern slavery in our organization. We recognize that modern slavery may take various forms, such as slavery and slavery-like practices, servitude, compulsory, forced and child labour, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain (“Modern Slavery”). In any form, Modern Slavery is a violation of fundamental human rights, and we are committed to taking the steps necessary to prevent and reduce the risk that Modern Slavery is used in our business and supply chains.

## **Steps Taken to Prevent and Reduce the Risks of Forced Labour and Child Labour**

In general terms, WeCommerce took the following steps during the Reporting Period and the first half of 2024 to identify, prevent and reduce the risk of forced labour or child labour in our business and supply chains:

- Consideration of the latest governmental advice and guidance;
- A review of our risk management infrastructure including policies, procedures and legal obligations; and
- Discussions with WeCommerce’s subsidiaries regarding risks of Modern Slavery in their businesses and supply chains.

## **Structure, Activities and Supply Chains**

### ***Structure***

WeCommerce Holdings LP (the “Partnership”) was incorporated under the *Company Act (British Columbia)* on March 20, 2023. On April 17, 2023, WeCommerce Holdings Ltd. (“WCH”), the initial and only limited partner of the Partnership, entered into a contribution agreement with the Partnership whereby, among other things, WCH transferred all of the assets used in the operation of its business and the outstanding equity securities of WeCommerce Operations Ltd., Stamped Technologies Pte Ltd., WeCommerce General Partner Ltd., and Archetype Themes Limited Partnership to the Partnership. All assets and liabilities were transferred to the Partnership in exchange for limited partnership units resulting in a business combination involving entities or businesses under common control.

WeCommerce conducts its operations primarily through wholly owned subsidiaries located throughout Canada, the United States and Europe. It was determined that the consolidated Partnership group meets the definition of an entity and not any of its subsidiaries in accordance with the Act.

### ***Activities***

WeCommerce is a holding company with a strategy of acquiring majority stakes in businesses. Its operating subsidiaries develop, sell and support website themes and applications, as well as providing custom solutions, for clients on ecommerce platforms. WeCommerce is domiciled in the Province of British Columbia, and invests primarily in North America and Europe, with the majority of its revenues coming from these jurisdictions.

WeCommerce’s head and registered offices are located in Vancouver.

As at December 31, 2023, WeCommerce and its subsidiaries (including its portfolio companies) had an aggregate of 147 full-time and part-time employees and independent contractors globally.

### ***Supply chains***

As part of our business, we have limited supply chains of service providers. WeCommerce's main source of goods is its services to customers. The suppliers would be the employees of the businesses who provide such services, which may include temporary contractors (i.e. software engineers, graphic designers). In addition, it also has service providers in the following sectors: professional services (such as lawyers, accountants and consultants); IT services; human resources and recruitment services.

### **Policies and Due Diligence**

#### ***Policies***

WeCommerce's corporate governance framework is supported by several key corporate policies which are related to or affirm our zero-tolerance stance on Modern Slavery. These policies include:

- *Code of Business Conduct and Ethics*
- *Whistleblower Policy*
- *Anti-Corruption Policy*

At WeCommerce, the *Code of Business Conducts and Ethics* (the "Code") and the *Anti-Corruption Policy* applies to Directors, officers, employees, and consultants of WeCommerce and its wholly owned subsidiaries, unless a comparable code of conduct applies in respect of the subsidiary. Upon onboarding, all individuals subject to the Code are required to acknowledge that they have read the Code, that they understand their obligations under it, and that they agree to comply, and have complied, with it.

The *Whistleblower Policy* encourages reporting, including confidential reporting of any discriminatory conduct, including suspected cases of Modern Slavery. Notably, "the Company is committed to maintaining the highest standards of business conduct and ethics. This policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith". The Complaints Officer will further investigate any allegations of these wrongdoings and if need be, any further involvement from the senior leadership team.

#### ***Due Diligence***

Although WeCommerce does not currently screen potential suppliers or conduct due diligence on existing suppliers on the basis of forced labour or child labour-related risks, we are committed to respecting human rights in all aspects of our operations and business activities and are considering how such processes may be incorporated into our procurement processes.

WeCommerce maintains appropriate mechanisms for its stakeholders to report or raise concerns should they suspect or witness unethical or unlawful behaviour. The *Whistleblower Policy and Anti-Corruption Policy* outlines the process in place for directors, officers, employees and consultants to promptly report any suspected violation of our codes and policies, or of any law, rule or regulation. All reports are taken seriously and treated with utmost confidentiality.

### **Operational and Supply Chain Risks**

We consider our risk of Modern Slavery within WeCommerce's operations to be very low. Although our employees operate globally, we have internal controls that serve to safeguard the rights of our employees and our operations rely primarily on skilled individuals. We do not engage anyone in our operations that is under the age of 18.

WeCommerce has limited access to direct supply chains and not being engaged in high-risk activities, we view the risk of Modern Slavery being used in the supply chains subject to this Report as very low. As discussed above, our primary suppliers are our employees and contractors. A background check and all information provided is validated as part of the hiring process. Our other suppliers are in the areas of professional services (such as lawyers, accountants, and consultants); IT services; human resources and recruitment services. We strive to mitigate the risks of Modern Slavery in our supply chain through the *Code of Business Conduct and Ethics* and *Anti-Corruption Policy*.

### **Remediation**

WeCommerce's assessment of its business and supply chains for the risk of Modern Slavery did not identify any instances of Modern Slavery. Accordingly, no steps were required to remediate the presence of Modern Slavery, or the loss of income associated with remediation efforts.

### **Training**

When onboarding new employees, WeCommerce provides training regarding its safety commitments and provides a copy of the *Code of Business Conduct and Ethics*. WeCommerce is committed to improving the capacity of its employees to understand, identify and manage the risks of Modern Slavery in our operations and across its supply chains.

### **Effectiveness Assessment and Next Steps**

We are continuing to assess the risks of modern slavery in our operations and supply chains. We have not yet taken any actions to assess the effectiveness of any actions.

WeCommerce is committed to continuous improvement with respect to its operations and supply chain to reduce and prevent risks of Modern Slavery. This includes the following actions:

- WeCommerce intends to implement Modern Slavery awareness training for all hiring managers, which will continue to build awareness and understanding of Modern Slavery;
- Continuing to review its statements, policies, procedures and practices periodically to determine whether any enhancements should be made to reinforce our commitment to preventing Modern Slavery from taking place in our business and in our supply chains;
- Work together with Tiny to ensure it adopts Tiny's Code of Business Conduct and Ethics and Whistleblower Policies; and
- Taking actions to assess our effectiveness in preventing and reducing risks of Modern Slavery.

### **Approval**

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of WeCommerce Holdings LP on May 31, 2024.

In my capacity as a Director of WeCommerce Holdings LP, and not in my personal capacity, I make this attestation for and on behalf of WeCommerce Holdings LP in accordance with the requirements of the *Modern Slavery Act*.

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.

“/s/ David Charron”  
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I have the authority to bind WeCommerce Holdings LP.

**David Charron**

Director

May 31, 2024