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MODERN SLAVERY STATEMENT

Purpose of statement

Etsy, Inc. is committed to combating modern slavery in our operations and supply chain. Etsy strives to comply with employment laws of all countries in which it operates and expects those with whom it does business to do the same.

Etsy's mission to "Keep Commerce Human" is rooted in our belief that, although automation and commoditization are parts of modern life, human creativity cannot be automated, and human connection cannot be commoditized. We believe that consumers are demanding more of the businesses they support and that companies that build win-win solutions that are good for people, the planet, and profit will be best positioned to succeed.

The UK Modern Slavery Act (2015) and the Australia Modern Slavery Act (2018) require certain entities to report on their activities in response to modern slavery risk within their business operations and supply chains. Etsy takes its responsibility to prevent slavery and human trafficking seriously and supports transparency requirements attached to existing and upcoming regulation.

This statement refers to activities that occurred during Etsy's 2025 fiscal year, which ended December 31, 2025, and it has been approved by the Board of Directors of Etsy Ireland Holding Unlimited Company ("UC") (for itself and on behalf of its subsidiaries Etsy Ireland UC, Etsy UK Limited, and Depop Limited).

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Organizational structure and supply chains

Etsy, Inc. operates two-sided online marketplaces that connect millions of passionate and creative buyers and sellers around the world. Powered by over 2,000 full time employees worldwide, these marketplaces share common levers for growth, similar business models, and a strong commitment to use business and technology to strengthen communities and empower people. Each Etsy, Inc. marketplace primarily operates independently, while benefiting from shared expertise in product development, marketing, technology, procurement, and customer support.

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This statement has been developed on behalf of Etsy Ireland Holdings UC (and on behalf of its subsidiaries Etsy Ireland UC, Etsy UK Limited, and Depop Limited) to comply with reporting obligations under the UK Modern Slavery Act (2015) and the Australia Modern Slavery Act (2018). Except where otherwise stated, this statement reflects only the operations of these Etsy subsidiaries.

This statement has been prepared by Etsy's subject matter experts whose work supports our efforts to identify and mitigate potential modern slavery risks in our operations and supply chains. Development of this statement included input from and collaboration with key stakeholders across relevant functions and the aforementioned Etsy subsidiaries.

On February 15, 2026, Etsy entered an agreement to sell its subsidiary Depop Limited to eBay. Closing is expected to occur by the end of the third quarter of 2026. This report includes data through December 31, 2025. Etsy does not plan to update this statement in respect of Depop following the completion of the Depop transaction.

Etsy's Marketplaces	
Etsy	**Depop**
Etsy is a global, online marketplace dedicated to the sale of unique and creative goods such as handmade and vintage pieces. Etsy is a platform for a community of sellers to list, sell, and distribute their own products whilst providing support, guidance and guidelines for both sellers and buyers. As of December 31, 2025, 86.5 million buyers and 5.6 million sellers were active on the Etsy marketplace. Etsy, Inc. is headquartered in Brooklyn, NY with offices in Dublin, Ireland and Mexico City, Mexico.	Depop is on a mission to make fashion circular. Since its founding in 2011, Depop has been a people-powered fashion marketplace where anyone can buy, sell, explore, and discover incredible secondhand fashion. As of December 31, 2025, there were 55.6 million registered users, 7.0 million active buyers, and 3.2 million active sellers on Depop. Depop is headquartered in London, England.

The Etsy marketplace enables millions of independent sellers – 89% of whom are businesses of one and 97% of whom work from home – to pursue creative work on their own terms, supporting flexible, self-directed, and autonomous economic opportunity.[1]

Our marketplaces facilitate the sale of items between sellers and buyers directly. As such, the company does not engage in the production of goods that are sold on the company's marketplaces, making Etsy's supply chain divergent from traditional brand, retail, or e-commerce models.

Etsy does utilize a number of vendors, contractors, and consultants, collectively our "vendor partners," in the ordinary course of its business. Our corporate supply chain consists of vendor partners we engage directly and the suppliers of our partners (i.e., indirect vendors) that provide a

[1] Data from Etsy marketplace's November 2024 seller census. Global methodology: Etsy sellers with an active shop in all of our core markets (United States, United Kingdom, Germany, France, Canada and Australia) were randomly selected to take part in a 25 minute online survey between October 1, 2024 and October 16, 2024. The survey and data analysis of the results were conducted by Ipsos, a leading Research and Public Opinion firm, in partnership with Etsy. The total global sample size was 2,402 sellers. Results were weighted to represent Etsy's global footprint and seller population parameters. The margin of error for the global survey is +/- 3.1%, but may vary per question.

Docusign Envelope ID: BABC5610-E351-84A0-8082-A8674272A8F9

wide range of products and services, including, but not limited to, IT infrastructure and software services, marketing and advertising services, payment processing services, professional services, facilities management, and outsourced business process and customer support services. These vendor partners are typically engaged through a rigorous selection and vetting process to, among other things, (a) enable Etsy to access otherwise unavailable expertise; (b) fill short term staffing requirements (for example, temporary leave replacements); (c) support our online platforms and business operations; (d) support our offices; and (e) mitigate supply chain risk and help us adhere to ethical practices and human rights standards throughout our operations and supply chains.

Policies and procedures in relation to slavery and human trafficking

We are committed to working to the highest ethical standards which are reflected in the policies and procedures we have implemented in our business. We require all of our employees, suppliers, sellers, relevant stakeholders, and other third parties to acknowledge they have reviewed the relevant policies.

Etsy, Inc. *Etsy, Inc. has several policies in place that support our commitment to operating responsibly. They are designed to ensure that stakeholders in our business and supply chains are treated with respect and dignity. Our policies are generally reviewed and updated on an annual basis.*	
Etsy corporate functions and Etsy marketplace	**Depop**
Etsy Code of Conduct: Sets out expectations of Etsy employees, including contractors, consultants, suppliers, and agents. The policy clearly references the prohibition of the use of any forced, compulsory, or child labor by Etsy stakeholders including its sellers. The policy also references a whistleblower line for reporting with the option for anonymity.	**Depop Code of Conduct:** While Etsy's Code of Conduct is applicable to Depop, Depop has a Depop-specific Code of Conduct, which sets out expectations of Depop employees including contractors, consultants, suppliers, and agents. The policy clearly references the prohibition of the use of forced, compulsory, or child labor by Depop stakeholders including its sellers. The policy also references a whistleblower hotline for reporting with the option for anonymity.
Etsy Supplier Code of Conduct: Sets out expectations for suppliers and includes the prohibition of forced, compulsory, or child labor and all forms of modern slavery, including human trafficking. The policy recommends that suppliers maintain and enforce robust human rights policies and regularly assess their systems for evaluating and managing their human rights impacts and strategy to reduce any negative impacts within their operations and supply chains. It also provides the company's whistleblowing hotline contact numbers. This Code of Conduct is available in 12 languages/dialects, including German, English (United Kingdom), English (India), English (United States), Spanish, French, Italian, Japanese, Dutch, Polish, Portuguese, and	**Depop Supplier Code of Conduct:** Requires suppliers to respect human rights, provide fair working conditions, and prohibits the use of forced, compulsory, or child labor. It recommends that suppliers maintain a human rights policy. All Depop suppliers are required to acknowledge and, except in limited circumstances, agree to the Depop Supplier Code of Conduct.

Docusign Envelope ID: BABC5610-E351-84A0-8082-A8674272A8F9

Russian. All Etsy suppliers are required to acknowledge and, except in limited circumstances, agree to this Code of Conduct.	
Etsy Sanctions Policy: Prohibits the use of Etsy marketplace services for transactions that violate U.S. and international sanctions laws, including those administered by the U.S. Office of Foreign Assets Control (OFAC), the U.S. Department of Commerce, and applicable EU authorities. This includes restrictions on transactions involving embargoed regions and countries, prohibited individuals and entities on sanctions lists, and goods produced using forced labor, consistent with laws such as the U.S. Tariff Act.	**Depop Sanctions Policy:** Prohibits the use of Depop services for transactions that violate UK and international sanctions laws, including those administered by the UK Office of Financial Sanctions Implementation (OFSI), the U.S. Office of Foreign Assets Control (OFAC), and the U.S. Department of Commerce. This includes restrictions on transactions involving embargoed regions and countries, prohibited individuals and entities on sanctions lists, and goods produced using forced labor, in line with legislation such as the UK Modern Slavery Act and the U.S. Tariff Act.
Etsy Seller Policy: Outlines Etsy marketplace policies and Terms of Use. All Etsy marketplace sellers commit to following this policy. The Etsy marketplace maintains robust community guidelines to guide the behaviors of our sellers and buyers on the platform.	**Depop Top Seller Code of Conduct:** Sets out the requirements for Depop Top Sellers, including to comply with Depop policies and observe good environmental and social standards.
Ethical Expectations: What We Expect from Sellers Who Work With Production Partners: Sets out expectations for sellers on the Etsy marketplace who engage with production partners (i.e., a company or individual that is not a part of the Etsy seller's shop that helps physically produce items for sale in that shop) and includes the prohibition of child and involuntary labor, as well as reference to humane working conditions, including working hours.	**Social and environmental expectations for sellers using third parties to manufacture items:** Sets out Depop's expectations towards sellers using the Depop marketplace and includes the prohibition of child and involuntary labor, as well as reference to safe and hygienic working conditions and compliance with national laws regarding working hours and overtime.

Due diligence processes

Etsy requires suppliers to operate in accordance with local law and the applicable Supplier Code of Conduct. Sellers on the Etsy and Depop marketplaces are expected to abide by the applicable policies outlined above in the "Policies and procedures in relation to slavery and human trafficking" section.

When suppliers are vetted to provide goods or services to Etsy, they are required to complete a self-assessment questionnaire detailing their ethical performance and measures they have in place to address human rights related issues. Suppliers that provide full-time contractors are required to complete an additional questionnaire about their employment policies and benefits offerings and undergo an additional evaluation. Once a supplier is selected, it is required to read, acknowledge, and, except in limited circumstances, agree to Etsy's Supplier Code of Conduct or Depop's Supplier Code of Conduct.

As part of our compliance diligence performed on prospective suppliers, prior to beginning business, Etsy also requires suppliers to complete a compliance questionnaire and subsequently screens each

Docusign Envelope ID: BABC5610-E351-84A0-8082-A8674272A8F9

supplier within our vendor platform to identify potential risks including bribery/corruption, information security, privacy, sanctions, geography, conflicts of interest, legal (e.g., enforcement or class actions), and reputational (e.g. adverse media). Potential risks identified may inform what terms, conditions, and controls must be built into the applicable contract or operations with a prospective supplier and the level of oversight during the engagement.

Risk assessment and management

Etsy conducts risk assessments on new suppliers and ongoing monitoring of existing suppliers based on risk factors which include human rights. These risk assessments involve cross functional, internal teams, such as procurement, security, compliance, legal, internal audit, and strategic sourcing, to evaluate whether a supplier aligns with Etsy's values and ethics as outlined in the Etsy and Depop Supplier Code of Conduct. This includes assessing potential ethical, reputational, and operational risks of engaging with the supplier, informed by available alerts and a thorough review of publicly available information. Etsy shares findings from these risk assessments with internal stakeholders and, if needed, puts in place remediation plans and/or termination plans with a supplier where appropriate. Our risk assessment process is reviewed annually and updated as necessary through a collaborative effort involving our procurement, compliance, and sanctions teams.

Etsy conducts quarterly supplier oversight reviews as part of our ongoing efforts to assess supplier behavior and uphold the standards outlined in our Supplier Code of Conduct. These reviews are distinct from the risk assessments performed during supplier onboarding and ongoing monitoring. Suppliers are selected based on overall spend, risk characteristics, and prior due diligence findings. As part of these reviews, Etsy examines supplier invoicing and contracting practices to determine whether supplier operations, as they relate to services provided to Etsy, remain aligned with our ethical standards.

In addition to the processes described above, and consistent with a risk-based approach to identifying and prioritizing modern slavery risks, Etsy places additional focus on certain supplier categories where labor-related risks may be more likely to arise and where enhanced diligence may be more meaningful. Business process outsourcing partners are a key area of focus within this framework. These partners support core operational functions and involve workforce-intensive service delivery across multiple sites.

To support this focus, Etsy uses Sedex, a third-party supply chain diligence platform, to assess risks related to labor standards and human rights. The platform combines external country- and industry-specific risk data with supplier-reported information to generate relative risk insights and highlight areas for further engagement. Through this process, Etsy assesses modern slavery risks across a range of social areas, including freely chosen employment, freedom of association, wages, working hours, discrimination, regular employment, and health and safety.

Business process outsourcing partners are required to be members of Sedex and complete an annual Sedex questionnaire covering labor standards topics relevant to their operations. The resulting data – including risk scores and underlying supplier responses – is reviewed as part of Etsy's supplier engagement processes.

These requirements are supported by contractual obligations for partners to undergo an annual third-party social compliance audit and to share the results with Etsy. We are in the process of operationalizing procedures to evaluate audit findings through our annual business reviews, where

Docusign Envelope ID: BABC5610-E351-84A0-8082-A8674272A8F9

Etsy and the relevant supplier would discuss any recommended or required remediation actions and appropriate follow-up steps.

Etsy's whistleblowing hotline is managed by Etsy Compliance and is available to all communities in Etsy's marketplaces. Whistleblower hotline operators are available for English, French, German, and Spanish speakers.

Although Etsy does not own or control the supply chains associated with products sold on the platform, we take steps to mitigate risks by establishing policies that clearly define what is allowed and not allowed on our marketplaces. These policies have been carefully and thoughtfully developed to help keep our marketplaces safe. We also maintain a clear risk governance structure to ensure risks are properly evaluated. When new risks arise – whether due to changing circumstances or newly identified concerns – a senior management-level body assesses them and determines whether updates to our policies and enforcement approach are needed to stay ahead of the risk and prevent violations. Policy enforcement is supported by a robust monitoring and oversight program that tracks adherence to policies through measurable performance metrics. We remain focused on continually improving our approach to ensure that our policies are both effective and consistently enforced.

Etsy marketplace's Trust & Safety team is dedicated to educating the Etsy marketplace community about our policies, detecting potential content violations, and taking enforcement actions against items and accounts that are flagged for violating our policies. Users and trusted authorities can alert Etsy marketplace of potential policy violations, including violations of Ethical Expectations: What We Expect from Sellers Who Work With Production Partners.

Based on the information currently available to us, as well as the locations of our workforce and our suppliers, our job compositions, and our management processes and onboarding procedures, we have no indication of modern slavery in our own operations or direct vendor partners. Regarding our indirect vendors, having visibility into their practices can be challenging, and visibility may be limited, which can present potential risks associated with modern slavery. In 2025, we did not receive any credible reports of instances of modern slavery occurring in our corporate supply chain, as described above.

Training on modern slavery and trafficking

All Etsy employees and contractors are required to review and acknowledge the company's Code of Conduct during onboarding, as well as undergo an annual dedicated refresher training, which is internally developed and addresses the components of the Code of Conduct. The Code of Conduct and refresher training are reviewed annually and updated as necessary.

Assessing the effectiveness of our actions

The effectiveness of our approach to addressing modern slavery risks is assessed through the processes described above, including ongoing monitoring of supplier activities through supplier oversight reviews, and annual reviews of our risk assessment processes and related policies. These practices help ensure our approach remains current and responsive to changes in our operations and supply chain.

Docusign Envelope ID: BABC5610-E351-84A0-8082-A8674272A8F9

For business process outsourcing partners, we are in the process of operationalizing how outputs from supplier engagement – including Sedex risk scores and audit findings – will be used to assess whether identified areas of concern are being addressed and to inform where additional focus or changes may be required. We expect to develop a year-over-year view of supplier practices and risk profiles as additional data becomes available.

Enhancing our policies and approach

Etsy is committed to transparency in our approach to respecting human rights. To continue to address the risk of modern slavery within Etsy's supply chain and operations, we aim to maintain strong policies, including our Human Rights Commitment, and to continue strengthening our risk identification and response mechanisms. Further, we aim to continue educating relevant employees, based on their roles, on the risks of modern slavery and how to report concerns.

In 2025, we advanced our supplier engagement approach through our work with Sedex. This included onboarding our business process outsourcing partners and completing the first annual cycle of supplier questionnaires, providing increased visibility into this supplier category across key labor standards areas. Building on this foundation, we intend to continue to leverage Sedex to deepen our understanding of supplier risk over time and inform future enhancements to our approach.

We also continued our work with Nest to develop educational videos for Etsy marketplace sellers who engage with production partners, building on work initiated in 2024. These videos are designed to support sellers in understanding and applying the "Ethical Expectations: What We Expect from Sellers Who Work With Production Partners" policy. In 2025, we published additional videos covering key topics such as voluntary labor, humane working conditions, and non-discrimination, alongside earlier content addressing child and youth labor.

Unless the context otherwise requires, we use the terms "Etsy," the "company," "we," "us" and "our" in this Modern Slavery Statement to refer to Etsy Ireland Holdings UC and its subsidiaries Etsy Ireland UC, Etsy UK Limited, and Depop Limited.