



MODERN SLAVERY STATEMENT

Purpose of statement

Etsy, Inc., is committed to combating modern slavery in our operations and supply chain. Etsy, as a “House of Brands,” complies 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 California Transparency in Supply Chains Act (2012) require certain businesses to report on their activities in response to modern slavery risk within their business operations and supply chains. Etsy takes its responsibility seriously to prevent slavery and human trafficking and supports transparency requirements attached to existing and upcoming regulation.

This statement has been approved by the Board of Directors of Etsy Ireland Holdings UC (for itself and on behalf of its subsidiaries Etsy Ireland UC, Etsy UK Limited and Depop Limited).

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 Dennis Price
 Director

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 Merilee Buckley
 Director

Organizational structure and supply chains

Etsy operates two-sided online marketplaces that connect millions of passionate and creative buyers and sellers around the world. Powered by more than 2,400 full time employees worldwide, these marketplaces share our mission, common levers for growth, similar business models, and a strong commitment to use business and technology to strengthen communities and empower people. Our marketplaces primarily operate independently, although some of our functions in key areas such as finance, legal, and human resources, for example, support all four marketplaces to some extent.

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), which sit in scope of reporting against the UK Modern Slavery Act 2015. At present none of Etsy’s other subsidiaries meet the reporting requirements, as such this statement does not reflect the operations of these Etsy subsidiaries.

Etsy's House of Brands			
Etsy.com	Reverb	Depop	Elo7
Etsy.com is a global marketplace dedicated to the sale of unique and creative goods such as handmade and vintage pieces. Etsy.com 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, 2022, 89.4 million buyers and 5.4 million sellers were active on the Etsy.com marketplace.	Reverb, headquartered in Chicago, was launched in 2013 on the principle that buying and selling musical instruments should be easy. Reverb connects buyers and sellers of new, used, and vintage musical gear from all over the world. As of December 31, 2022, our Reverb marketplace had 811 thousand active buyers and 229 thousand active sellers.	Depop, headquartered in London, is dedicated to building the world's most diverse and progressive home of fashion. Since its founding in 2011, Depop has evolved to become a community-powered fashion marketplace to buy and sell unique fashion, with approximately 30 million registered users as of December 31, 2022.	Elo7 was founded in 2008 and is headquartered in São Paulo, Brazil. Elo7 specializes in custom and made-to-order merchandise, connecting approximately 53 thousand active sellers and 1.6 million active buyers as of December 31, 2022.

Etsy's 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.

As an online marketplace company, Etsy has suppliers dedicated to supporting our offices and online platforms, such as for our IT infrastructure, food and beverages, and facilities management.

All of our marketplaces maintain robust community guidelines which guide our communities' behavior on the platform and establish requirements in relation to ethical production. With millions of active buyers and active sellers across the House of Brands, Etsy provides training and support materials to help sellers fully understand the modern slavery risks within their business in order to succeed in growing ethical businesses.

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, buyers, and relevant stakeholders and other third parties to review the relevant policies.

Etsy corporate functions and Etsy.com	Depop
<i>Etsy.com 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.</i>	<i>Depop has existing policies and expectations for sellers that are designed to promote ethical trade. Additionally, Depop is currently undergoing a review of its policy to align with Etsy's Supplier Code of Conduct.</i>
Supplier Code of Conduct: Sets out expectations for suppliers and includes the prohibition of forced, compulsory, or child labor as well as providing information on the company's whistleblowing hotline contact numbers. All Etsy corporate and Etsy.com suppliers are required to adhere to this Code of Conduct at a minimum.	<u>Social and environmental expectations for sellers using third parties to manufacture items:</u> This public facing document sets out Depop's expectations towards sellers using the Depop marketplace and includes the prohibition of child and forced labor, as well as reference to safe and healthy working conditions and the prohibition of excessive overtime.
<u>Ethical Expectations:</u> Sets out expectations for sellers using Etsy.com platform 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). This includes provisions on the prohibition of forced or child labor.	Top Seller Code of Conduct: Sets out expectations towards Depop sellers to comply with Depop policy and local law in relation to issues such as labor, ethics, and environmental respect. (Applicable to Top Sellers only.)
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 forced, compulsory, or child labor by Etsy stakeholders including its sellers. The policy also references a whistle-blower line for reporting with the option for anonymity. Whistleblower hotline operators are available for English, French, German, Spanish and Portuguese speakers.	Depop Code of Conduct: While Etsy's Code of Conduct is applicable to Depop, a Depop specific Code of Conduct was completed in 2022, 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 whistle-blower hotline for reporting with the option for anonymity. Whistleblower hotline operators are available for English, French, German, Spanish and Portuguese speakers.

Risk assessment and management

Periodic risk assessments are conducted on suppliers based on risk factors which include human rights. These risk assessments involve cross functional, internal teams such as security, compliance, legal, internal audit, and strategic sourcing to conduct a deep dive into compliance in relation to work conducted directly with Etsy as well as through publicly available information in a broader context.

Etsy works to monitor supplier behavior with support from an online whistleblowing platform which enables the marketplace community to flag potential concerns regarding Suppliers. The platform is managed by Etsy Compliance and is available to all communities

in Etsy's House of Brands. Whistleblower hotline operators are available for English, French, German, Spanish and Portuguese speakers.

All Etsy sellers commit to following our Seller Policy, which outlines our marketplace criteria. Our Trust & Safety team is dedicated to educating the Etsy 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 of potential policy violations, including violations of Ethical Standards for Production Partners.

Training on modern slavery and trafficking

Etsy.com employees are required to review the company's Code of Conduct during orientation as well as through an annual dedicated refresher training on its content. In 2023, Depop employees will begin training on the same annual compliance calendar.

Due diligence processes

Etsy takes steps to ensure suppliers operate in accordance with local law and the Supplier Code of Conduct. Sellers on Etsy.com and Depop are not considered suppliers, and are expected to abide by the respective 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 corporate or Etsy.com, 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, they are required to read and acknowledge Etsy's Supplier Code of Conduct.

Depop is currently undergoing a review of its policy to align with Etsy's Supplier Code of Conduct and plan to implement the vendor self-assessment questionnaire.

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 supplier 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 inform what terms, conditions, and controls must be built into a contract with a prospective supplier and the level of oversight during the engagement.

Key performance indicators to measure effectiveness of steps being taken

To continue to address the risk of modern slavery within Etsy's supply chain and operations, we expect to continue to strengthen risk identification and response mechanisms. Further we aim to educate relevant employees, based on their roles, on the risks of modern slavery and how to report concerns.

As a next step in our commitment to combating modern slavery, Etsy is engaging with a human rights consultancy in 2023 to develop a roadmap to further improve our internal policies and processes to identify and address modern slavery risk.

Unless the context otherwise requires, we use the terms "Etsy," the "company," "we," "us" and "our" in this UK Modern Slavery Act statement to refer to Etsy, Inc. and, where appropriate, our consolidated subsidiaries.