



Wish Vendor Code of Conduct

Objective

The following Vendor Code of Conduct ensures that Wish’s business partners provide services to Wish in a lawful and responsible way.

Scope

These policies apply to any and all entities supplying goods and/or services to Wish, including subcontractors¹ (hereafter: “Vendors”), and incorporate by reference Wish’s general [Code of Conduct and Ethics](#).² Unless otherwise specified, Vendors are expected to operate and comport themselves and their businesses pursuant to and consistent with all local, national and international laws applicable to the jurisdictions in which they operate and/or are present (“all applicable laws”).

Ethics, Laws, and Regulations

Vendors are required to abide by all applicable laws and are expected to have processes to ensure compliance with this Code of Conduct. This includes, but is not limited to, laws and regulations relating to:

- Antitrust and fair competition;
- Anti-bribery and anti-corruption including money laundering, terrorism financing, bribery and kickbacks, inappropriate gifts or entertainment, the US Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act and other anti-corruption laws;
- Lobbying, gifts and payment to public officials, “grease” payments to expedite or secure the performance of a routine government action, and political campaign contribution laws;
- International trade, export control and sanctions, and global customs;
- Privacy and data security, including the protection of personal data, information security and privacy, and;
- Insider trading, and trading on the basis of non-public information or providing such information to others.

Vendors must also avoid actual or potential ethical or financial conflicts of interest when working with Wish (i.e., instances where a Vendor’s personal interests [including the

¹ *Note re: Vendor subcontractor relationships:* Vendors are required to obtain Wish’s prior written consent before subcontracting the performance of their service obligations to a third party, and any approved subcontractor is also expected to be in compliance with this Vendor Code of Conduct as well as Wish’s Code of Conduct and Ethics.

² *Note:* Third-party Merchants using the Wish platform are not covered by this Code of Conduct, but are otherwise bound by Wish’s Terms and Conditions and Merchant Policies.



interests of the Vendor itself or its employees, officers, or directors] interfere or appear to interfere with Wish's interests). Any actual or potential conflicts of interest must be promptly reported to Wish.

Labor and Human Rights Practices

Vendors must comply with all applicable laws relating to employment, labor, and human rights laws, including, but not limited to, those relating to:

- Employment eligibility, wherever employees are located;
- Workplace harassment and unlawful discrimination;
- Compensation, parental leave, freedom of association, employment documentation (including immigration and payroll documentation), and employee benefits and protections;
- Working conditions, workplace safety, and employee grievance procedures;
- Forced, compulsory, or child labor;
- Trainings and other communication related to workplace rights and requirements; and,
- Any other applicable body of law or regulation relating to working conditions, workplace safety, or other employee rights.

Wish Vendors should also consider principles of diversity, equity, inclusion, and belonging, in their business and workforce.

Protection of Data, Privacy, Intellectual Property, and Other Assets

Vendors must comply with all applicable laws, as well as relevant standards, relating to data security, confidentiality, privacy, and intellectual property, and must ensure adequate protection of any confidential, personal, or proprietary information obtained from Wish during the course of our working relationship, including when receiving access to any Wish internal network, system or building. Vendors may only disclose such information to a third party with advanced, written authorization from Wish.

Vendors must protect and use Wish's intellectual property (IP) and tangible assets responsibly and must seek advance authorization to use any such IP or assets.

Environmental Laws and Practice



Vendors must abide by all applicable laws relating to the environment, including, but not limited to, those relating to hazardous materials and waste management, wastewater discharge, and air emissions.

Vendors should also consider additional means and ways to conduct their businesses in an environmentally responsible and sustainable manner, which may include establishing policies and practices to reduce and/or mitigate harmful environmental impacts of business operations.

Recordkeeping

Vendors are required to keep accurate records that thoroughly reflect all transactions with Wish in reasonable detail, including, but not limited to, Vendors' responses to requests for proposals, invoices for goods and services, time records and any other documentation related to Vendors' business relationship with Wish.

Wish's Right to Audit

Wish reserves the right to audit a Vendor's practices upon reasonable notice to confirm compliance with this Code of Conduct and Vendors agree to provide supporting data in response thereto. Wish reserves the right to discontinue any Vendor relationship in the event of any violation of this Code of Conduct.

Reporting Concerns

If you see or suspect a violation of this Code of Conduct, or believe you are unable to meet any of its terms, you are required to notify Wish immediately.

To do so:

- Contact a manager on your Wish engagement;
- Contact our General Counsel, Head of Human Resources, or Chief Compliance Officer;
- Call the Wish Ethics Hotline:
 - United States: 1-844-362-0786
 - Canada: 1-844-362-0786
 - China: 400-6-612-179
 - Amsterdam: 0800-3800012
- Or visit: wishemployee.ethicspoint.com