



## ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

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### Introduction

This joint statement is made on behalf of SPS Commerce, Inc., and its subsidiaries (collectively referred to as “SPS”) and sets out the steps that SPS has taken and is continuing to take to mitigate risks that modern slavery and human trafficking are not taking place within SPS’s business or supply chain.<sup>1</sup>

### Organizational Structure

SPS Commerce, Inc., originally incorporated as St. Paul Software, Inc., a Minnesota corporation, on January 28, 1987. On May 30, 2001, St. Paul Software, Inc., reincorporated in Delaware under the current name, SPS Commerce, Inc. SPS is publicly traded on the NASDAQ Stock Exchange under the ticker symbol SPSC. The principal executive offices are located at, 333 South Seventh Street, Suite 1000, Minneapolis, MN 55402. SPS’s telephone number is (612) 435-9400 and the website address is [www.spscommerce.com](http://www.spscommerce.com).

SPS is transforming how our global retail supply chain co-operates by creating a more dynamic, interconnected community where players can more freely connect, collaborate, and prosper together. SPS’s comprehensive suite of cloud-based products and solutions lead the industry in establishing and maintaining stronger collaboration between retailers, grocers, distributors, suppliers, manufacturers, and logistics firms around the globe.

Further details on SPS’s organizational structure and its products can be found in the investor relations section on the website at [www.spscommerce.com](http://www.spscommerce.com).

### Governance Structure

The SPS Board of Directors provides strategic oversight to our company and requires high ethical standards for our officers, directors, and employees in the interest of SPS stakeholders.

SPS’s board conducts its business through meetings of established standing committees, made up of independent directors. This leadership structure is designed to ensure effective oversight while maximizing the contributions of individual members. This leadership structure also provides dedicated oversight across key areas that contribute to responsible corporate citizenship.

### Our Commitment

SPS strives to promote practices that aim to minimize risks of human slavery, human trafficking, forced labor, use of child labor, and all forms of exploitation within its business and supply chain.<sup>2</sup>

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<sup>1</sup> See our Form 10-K filed with the Securities and Exchange Commission for a list of subsidiaries.

<sup>2</sup> Slavery includes forced, child, prison, indentured bonded and slave labor, as well as labor obtained through human trafficking. Human trafficking is defined as the recruitment, transportation, transfer, harboring or receipt of persons, by means of threat or use of force or other forms of coercion, abduction, fraud, deception, the abuse of power or a position of vulnerability or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.



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SPS recognizes the importance of treating all who work with SPS with dignity and respect, and prohibits use of child labor, forced labor, or human trafficking in any form—including slave labor, prison labor, indentured servitude, or bonded labor—in its business. SPS is also dedicated to ensuring the protection of women's rights in all operations and initiatives. SPS acts ethically and with integrity in its business relationships and seeks to implement and enforce effective systems and controls to avoid the presence of any slavery and human trafficking anywhere in its business or supply chain.<sup>3</sup>

### Due Diligence and Policies

SPS maintains high ethical standards across all facets of our business based on comprehensive corporate policies and reinforcement and monitoring routines. SPS ensures its operations align with legal and regulatory frameworks while also promoting trust, transparency and a strong reputation for doing what is right in every aspect of its work.

SPS's [Code of Conduct](#) applies to all directors, officers and employees, setting forth the fundamental principles to avoid improper behavior and maintain the highest ethical standards. It sets clear expectations for conducting business with integrity and respect for others, free of impartiality. The Code also summarizes key laws and regulations designed to guide decision-making and ensure our business practices remain ethical and trustworthy.

The [Human Rights Statement](#) reinforces SPS's dedication to protecting the dignity and rights of all individuals connected to its business. These statements ensure clarity on SPS's stance against discrimination, forced labor and human trafficking, highlighting its commitment to foster a work environment built on respect, fairness and inclusion.

The [Supplier Code of Conduct](#) is shared with all suppliers during the onboarding process. This document outlines the expectations for ethical behavior, compliance with laws and the treatment of employees with respect and dignity. SPS expects all suppliers to comply with its Supplier Code of Conduct and ensure their own supplier community shares in the same commitment.

### Training

During new hire onboarding, employees are required to acknowledge and review key policies such as SPS's Code of Conduct, Anti-Discrimination and Anti-Harassment Policy, Human Rights Statement, and Anti-Slavery Statement. SPS monitors and reports our acknowledgement rate to the Audit Committee.

SPS encourages employees to immediately notify management if they become aware of a violation of the Code of Conduct or applicable law and additionally provide an anonymous SPS Global

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<sup>3</sup> SPS's commitment and approach are informed by leading international standards and frameworks developed by the United Nations (UN) and International Labor Organization. SPS is committed to respecting and supporting the UN Guiding Principles on Business and Human Rights, UN Universal Declaration of Human Rights, UN Global Compact, UN Sustainable Development Goals, Core Conventions of the ILO, and ILO Declaration on Fundamental Principles and Rights at Work.



## **ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT**

Reporting Hotline at [spsglobalreportinghotline.ethicspoint.com](https://spsglobalreportinghotline.ethicspoint.com) maintained on its behalf by a leading third-party reporting service. SPS also expect suppliers to have their own internal reporting processes, and to share its commitment to not retaliate against people who make good faith reports of wrongdoing.

### **Risk Management and Assessment of Effectiveness**

SPS employs a multi-tiered approach to risk management. SPS's management team is responsible for identifying risks, informing policies and managing day-to-day risk exposures. At a higher level, the board of directors, supported by the audit committee, oversees material risks across multiple areas, including but not limited to cybersecurity, data privacy, regulatory compliance and operational risks. This structured division of responsibilities provides an effective and efficient approach to addressing risk management.

SPS will assess the effectiveness of our efforts to prevent modern slavery by regularly reviewing our procedures and policies.

Due to the nature of our software business, SPS considers itself to be generally low risk with respect to slavery and human trafficking issues. SPS is not aware of any modern slavery or human trafficking violations, either within the business or in our supply chains.

Should SPS become aware of any policy violations or issues related to slavery or human trafficking, we will consult with our HR and Legal Departments to ensure that appropriate measures are taken, which may include reporting this information to authorities and terminating our relationship with the supplier.

### **Consultation and Approval**

This joint statement was drafted in collaboration with authorized signatories who possess the authority to bind SPS Commerce, Inc., and its subsidiaries.

This statement is published in compliance with the United Kingdom Modern Slavery Act of 2015 and Australia Modern Slavery Act of 2018. The Board of Directors and management of SPS are fully committed to sustaining a work environment and supply chain free of human trafficking and modern slavery of any kind.

This statement is applicable to all SPS legal entities and was approved for the fiscal year ended December 31, 2024, by the Governance & Nominating Committee of the Board of Directors of SPS on May 12, 2025.

Brian Senger

General Counsel

Director, SPS Commerce Australia PTY Ltd.