



Anti Bribery & Anti Corruption Policy

GoTo Group

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1. PURPOSE

PT Goto Gojek Tokopedia Tbk's subsidiaries and its affiliates ("the Company") adopts a zero-tolerance approach towards any form of Bribery and Corruption breach regardless of jurisdiction of incorporation or locations of its operations. The Company will not knowingly assist in any other party's corrupt conduct. We never trade our integrity for a business opportunity.

The purpose of this Anti Bribery & Anti Corruption Policy ("ABAC Policy" or "the Policy") and procedures is to enforce and communicate the zero-tolerance approach of the Company to all Employees and Officers, in relation to their responsibilities and actions to be taken by each of them to comply with this Policy.

2. POLICY SCOPE

This Policy should be read in conjunction with the procedures of ABAC Policy. The scope of the Policy is as follows:

2.1 Persons that are Subject to this Policy

This Policy applies to all Employees and Officers of the Company, in all locations.

2.2 Transactions Subject to this Policy

Any external transactions and activities with a Third Party related to the Company's business activities, who may be commercial or Government entities, including interactions with the Third Party's' officers, employees, agents, and other appointed representatives at all levels.

3. DEFINITIONS

Terms Used in this Policy	Definitions
Bribery	The act of offering, promising, giving, receiving or soliciting of any gratification or undue advantage of anything of value (which could be financial or non-financial) as an inducement for a person acting or refraining from acting in relation to the performance of that person's duties.
Corruption	Corruption is a form of dishonesty or a criminal offense which is undertaken by a person or an organization which is entrusted in a position of authority, in order to acquire illicit benefits or abuse power for one's personal gain.
Charitable Donations	Charitable contributions to a non-profit organization (Organizations that work forward public interest for non-commercial purposes. Profit of this organization is either donated or for reinvestment of the organization. Type of Non Profit Organizations is different in each country since it is regulated by local laws.), to a fund or cause for which no return service or payment is expected or made, which may be in kind, cash and cash equivalents, products or time.
Employees	Any person who is employed under a contract of service (including permanent and temporary employees) by the Company, and includes every member of the Board of Directors.
Entertainment	Includes travel, food, drinks, and accommodation, given to or received by Company Employees for business relationships, and event invites offered to or received by the Company or its Employees to attend with the Third Party.
External Facing	This refers to functions which are demand generating in nature and are

Functions	business units reporting into the respective business units Presidents (excluding support functions such as Finance and Accounting, PAC), External Affairs and Corporate Development.
Gifts	Anything of value that an Employee offers to or receives from a Third Party, which does not result from any contractual obligations, and is not Entertainment.
Government Officials	Any appointed, elected, or career employee of a government agency, department, embassy, or other governmental entity, as well as politicians, political candidates, party officials, members of a ruling or royal family, and employees of state-owned or controlled organizations, and employees of public international organizations (e.g. the Red Cross, International Finance Corporation). Family members, close friends, agents, business partners, and charities of government officials are also considered Government Officials.
Officers	Every member of the Board of Commissioners, Board of Directors or any other equivalent governing body of the Company (including independent and non-independent, executive, and non-executive and shall also include alternate or substitute directors or commissioners).
Per Instance	Per Instance: includes (i) a single incident of giving or receiving Gifts and/or Entertainment; (ii) each time Gifts and Entertainment are offered or received during an entire event (e.g., total Gifts and Entertainment offered over a two-day event), or (iii) Gifts and Entertainment received from the same offeror or given to the same recipient in a year, whichever is the stricter criteria.
Political Engagements	Includes (1) political contributions (in kind and cash) for a political party, organization, and individual who is nominated by or connected with a political party or organization, (2) industry association expenditures and (3) public policy statements, which are made to promote business objectives and enhance shareholder value.
PPGR Spokesperson	The Company's Officers, Employees who are JACA level 7 or above and its equivalent, and employees involved in events managed by the PPGR department.
Sponsorship	In-kind or payment made to support the Third Party or for an activity, event or campaign in return of promoting the Company's name, image, activities, services and/or its products.
Third Party	An external party with whom the Company has, or plans to establish, some form of business relationship who are not Employees or Officers of the Company. This primarily includes, but not limited to, potential employees, clients, customers, joint ventures, joint venture partners, consortium partners, drivers, merchants, outsourcing providers, contractors, consultants, sub-contractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, investors, Government Officials, charitable organizations.

4. POLICY DETAILS

4.1 We Have Zero Tolerance for All Forms of Bribery and Corruption

The Company prohibits all forms of Bribery and Corruption. We do not bribe and we do not allow a Third Party to bribe on our behalf.

You will not suffer demotion, penalty, or other adverse consequences for refusing to pay or receive gratification or other illicit behavior, even if such refusal may result in the Company losing business or experience delay in business operations.

You are required to immediately make a detailed note and report to the Company in the event that any party demands any payment or benefit from you, threatens or attempts to harm you, or places you in a situation where you are at risk of violence or loss of liberty should you not comply with the demand made. Accurate documentation helps the Company to ensure the expenses are recorded accurately in our financial statements. This applies to any matter involving any Third Party.

The Company does not tolerate any form of extortion or threats against our Employees or our Officers when they are carrying out their duties for the Company. Do not attempt to respond to, take any action or resolve matters of extortion or threats on your own.

4.2 We Maintain Accurate Records

All transactions of the Company must accurately reflect how the Company's money is spent and how our revenues earned.

This means that:

- a. all books and records required by the management are prepared accurately in a timely and thorough manner;
- b. all transactions, dispositions and payments made on behalf of the Company and/or involving Company funds or assets are properly authorized and accurately recorded in the Company's books and records;
- c. no expenditure is made for any purpose other than as fully and accurately described in the Company's books and records;
- d. there are no undisclosed or unrecorded accounts or false entries in the Company's books and records; and
- e. personal funds must not be used to accomplish what is otherwise prohibited by this Policy.

The Company will conduct periodic audits of its books and records to monitor its compliance with this Policy.

4.3 We Comply with Local Laws

As each jurisdiction will have local laws and regulations pertaining to anti-bribery and anti-corruption, you must be aware of the standards prescribed by laws and regulations applicable to jurisdictions where the Company operates and ensure compliance.

4.4 We Do the Right Thing, In the Right Way

You are required to know and follow all the rules designed to prevent and detect Bribery and Corruption. Please refer to the applicable procedures for more details and the key principles are stated below.

4.4.1 Gifts and Entertainment

Gifts and Entertainment must meet the following requirements:

- Serve a legitimate business purpose;
- Be lawful in the location in which they are offered or received;
- For offering of Gifts and Entertainment, be allowed under the internal policies, procedures and rules of the recipient's organization;
- Not create or imply a return obligation or favor or conflict of interest;
- Not be intended to improperly influence a business decision or relationship;
- Not offered or received during sensitive contract negotiations and bidding period, unless the Gifts and Entertainment takes the form of reasonable meals as part of business courtesy or festive gifts that are legal, customary and reasonable in value;

- Not be offensive, inappropriate or are not aligned with the Company's values;
- Be approved, where pre-approvals are required by the Gifts and Entertainment Procedures; and
- Not be in excess of business or industry customs.

This Policy is not intended to prohibit reasonable and customary personal Gifts based solely on family or personal relationships apart from any business relationship, as long as the Gifts are not intended to improperly influence business with the Company with a Third Party.

It is expected that all offerings of Gifts and/or Entertainment by the Company's Employees must obtain the required pre-approvals before offering, since this activity is within the control of the Company's Employees.

Unless you are from External Facing Functions or have received the required pre-approvals, when a Third Party offers you Gifts and/or Entertainment that requires pre-approvals, you should do one of the following:

- Politely decline the Gifts and/or Entertainment when provided (Ethics & Compliance can provide a letter that you may use for the purpose of declining the Gifts and/or Entertainment after the fact); or
- Offer to pay for it, if you are not in a position to decline it.

If there is reasonable basis to believe that declining the Gifts or refusing the Entertainment could offend cultural norms or negatively impact the trust or business relationship with the Third Party, you may accept the Gifts or Entertainment on behalf of the Company, but you must immediately disclose it following the Disclosure Process (even if this is a post-approval) detailed in the Gifts and Entertainment Procedures, and if requested, you must turn in the Gifts to Ethics & Compliance. The collected Gifts will either be repurposed as prizes for all Employees events or auctioned off, in which case the funds collected will be donated to a charitable organization selected by the GoTo Impact Foundation team.

4.4.2 Charitable Donations

Charitable Donations must meet all the following requirements:

- They must be in accordance with the prevailing laws and regulations in the relevant countries.
- They must support the Company's charitable giving goals related to our sustainability efforts of zero waste, zero carbon and zero barriers, and also community impact activities related to disaster relief and goal of having a positive impact in the communities where we operate when there is a specific strategic, business or community need for doing so.
- Charitable Donations cannot be made to non-profit organizations that are not aligned with our donation strategy or that discriminate in the allocation of their support on the basis of a person's sex, race, sexual orientation, gender identity, gender expression, age, religion (note: Charitable Donations to religious organizations could be acceptable if the distribution of the donation is based on locally accepted cultural practice), disability, ethnic group, marital status, military or veteran status or any other class status protected by law. Any exceptions will require approval from the YABB Department and the Ethics & Compliance Department.
- They must not be made in exchange for an improper business advantage or other improper purpose.
- Appropriate pre-approvals must be secured, where required by the Charitable Donations Procedure.

4.4.3 Sponsorships

Sponsorships must meet the following requirements:

- Serve a legitimate business purpose;
- Written contract or Sponsorship letter is put in place, with clear contractual obligations on what the Sponsorship from the Company will be, for what purpose and what benefits will the Company be receiving;
- Sponsorships must not be made in exchange for an improper business advantage or other improper purpose.
- Appropriate pre-approvals must be secured, where required by the Sponsorships Procedure.

4.4.4 Political Engagements

In order to advocate for public policies that support the Company's objectives, we focus on educating policy makers on our business and business interests. The Company does not make political contributions or payments to political

candidates, political parties or political committees. If permitted by law, authorized by the Company's policy and deemed appropriate by management, we contribute to charitable organizations and industry associations.

Political Engagement must meet the following requirements:

- Political Engagements are conducted in compliance with all applicable laws and reporting requirements, as well as this Policy.
- Political Engagements are made in a manner consistent with the Company's values without regard to the private political preferences of the Company's Officers and Employees.
- Employees must promptly engage and consult the Company's Public Policy and Government Relations ("PPGR") department on matters involving multilateral, provincial, state or local governments, as well as their respective agencies and state-owned or state-controlled entities.
- Only PPGR Spokespersons may express the Company's views on public policy, legislation, ballot initiatives, regulations or government action. Other Employees may communicate the Company's views only with specific guidance from PPGR.
- Any Political Engagements with Government Officials that are performed by a non-approved PPGR Spokesperson must provide minutes of meetings to the PPGR team, within a week from the Political Engagements. Please refer to the Political Engagement Procedures for details on this requirement.
- Only the PPGR department may hire lobbyists to advance business interests, if required, which needs to be appointed through Procurement procedures.

4.4.5 Conflicts of Interest

4.4.5.1 Related to Government Officials

Employment or internship offers are considered items of value. Therefore, any such offer to a person who is related to a Government Official or business partner of the Company may potentially be viewed as a bribe or conflict of interest.

We have safeguards and due diligence procedures in place to avoid such risks, and to ensure that employment and internships are awarded solely on the basis of qualifications and merit. If it has come to your attention that a potential candidate is related to a Government Official or business partner of the Company, you must submit a Conflicts of Interest disclosure immediately. Offer of employment or internship to any such candidate requires written pre-approval obtained in accordance with the Conflicts of Interest disclosure process described in section 2.3 of the Conflicts of Interest Procedure.

4.4.5.2 Related to Others

Employees must act objectively and in the best interest of the Company when performing duties or exercising judgment on behalf of the Company. Employees shall not use their office position, confidential information, Company assets, Company time, and other resources of the Company for their personal gain or for the advantage of their close personal relationships. Employees shall review the Company Conflicts of Interest Policy and adhere to the accompanying procedures.

4.4.6 Dealing with a Third Party

Employees who procure services/products or engage with a Third Party in the course of their work must comply with the Company's procurement procedures and vendor policies at all times. Employees are also responsible for taking reasonable precautions to minimize Third Party risk of Bribery and Corruption, including but not limited to:

- a. conducting due diligence that is appropriate and proportionate to the proposed Third Party transaction or dealing;
- b. ensuring that there is a legitimate business reason for engaging with the Third Party;
- c. ensuring that any payment made by the Company to the Third Party is appropriate to the services performed or products provided;
- d. checking that there is no potential or actual conflict of interest in relation to the engagement of the Third Party (including but not limited to whether the Third Party has any connection with any Company

- Employee or Government Official); and
- e. monitoring the reasonableness and legitimacy of the work done and the expenses incurred by the Third Party in connection with and during the course of the Third Party's business relationship with the Company.

Any queries regarding the Company's procurement procedures, vendor policies and due diligence standards should be raised to the Procurement team. In addition, once a Third Party is engaged, the Employee responsible for overseeing the work of the Third Party is required to be alert and ready to respond to any "red flags".

Red flags are matters that raise concerns about the Third Party's conduct and/or indicate that the Third Party is potentially engaging in illegal or improper conduct, including but not limited to bribery. A red flag does not necessarily mean that an illegal act has taken place but it may warrant further investigation. However, red flags should not be ignored.

Employees who encounter any red flags or have reasons to suspect that a Third Party intends to or is engaging in bribery or other corrupt activity must notify the Ethics & Compliance team immediately to receive guidance on the matter. The Company will carry out the necessary investigations and respond in accordance with its relevant policies. If in doubt, Employees should err on the side of caution and report the matter or their suspicions to the Ethics & Compliance team immediately.

5.0 OBLIGATIONS OF EMPLOYEES AND OFFICERS

You are expected to support the zero-tolerance for all forms of Bribery and Corruption stated in this Policy. The roles of all Employees and Officers includes the following:

- 1) to understand and implement the zero-tolerance Bribery and Corruption in daily basis activities.
- 2) to be familiar with applicable requirements and directives of this Policy and communicate them to subordinates (for leaders);
- 3) to be familiar with the procedures and all other policies of the Company, including any country-specific addenda that may be applicable;
- 4) to promptly disclose and record all transactions and payments accurately and in reasonable detail;
- 5) to promptly report violations or suspected violations through the various Whistleblowing channel(s); and
- 6) to promptly complete relevant training and assessments from time to time as prescribed by the Company.

6.0 CONSEQUENCES OF POLICY VIOLATION

The Company reserves the right to modify or rescind this Policy and the applicable Procedures at any time, consistent with applicable law. Where another policy or agreement conflicts with this Policy, the stricter requirements shall apply.

Breach of, or non-compliance with, this Policy and the applicable Procedures may lead to disciplinary action(s) including and up to termination of employment.

7.0 RELATED POLICIES AND PROCEDURES

[Gifts & Entertainment Procedure](#)

[Sponsorships Procedure](#)

[Charitable Donations Procedure](#)

[Political Engagements Procedure](#)

[Conflicts of Interest Policy](#)

[Conflicts of Interest Procedure](#)

[Whistleblowing Policy](#)

Global Business Travel Policy ([Tokopedia](#))/([Gojek/GTE](#))

[GoTo Group Procurement Standard Operating Procedure Code of Conduct](#)

8.0 CONTACT


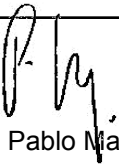
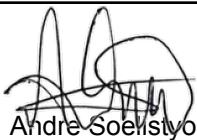
If you have any questions or doubts about this policy or its application, please err on the side of caution and transparency and seek advice from compliance@gotocompany.com.

You can reach out to your manager, People Business Partner, the Ethics & Compliance team if you would like to report any concerns or violations that you observed, or if you prefer to remain anonymous you can speak up by writing to the whistleblowing email: ethics@gotocompany.com.

9.0 DOCUMENT HISTORY

Version	Date	Prepared by	Reviewed & Acknowledged by	Summary of Revisions
1.0	28 February 2022	Ethics & Compliance	Chief Risk Officer	Launch of GoTo Group Anti-Bribery & Anti-Corruption Policy
2.0	1 June 2023	Ethics & Compliance	Legal	Streamline definitions, introduction of political engagements procedure and providing oversight to PPGR for government related engagements and YABB for charitable donations activities.

POLICY APPROVAL

Version	Approved by:		
2.0	 Amaresh Mehan	 Pablo Mialay	 Andre Soelistyo
	Group Chief Risk Officer	Group Chief Corporate Officer & Group General Counsel	Chief Executive Officer

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