



Code of Conduct

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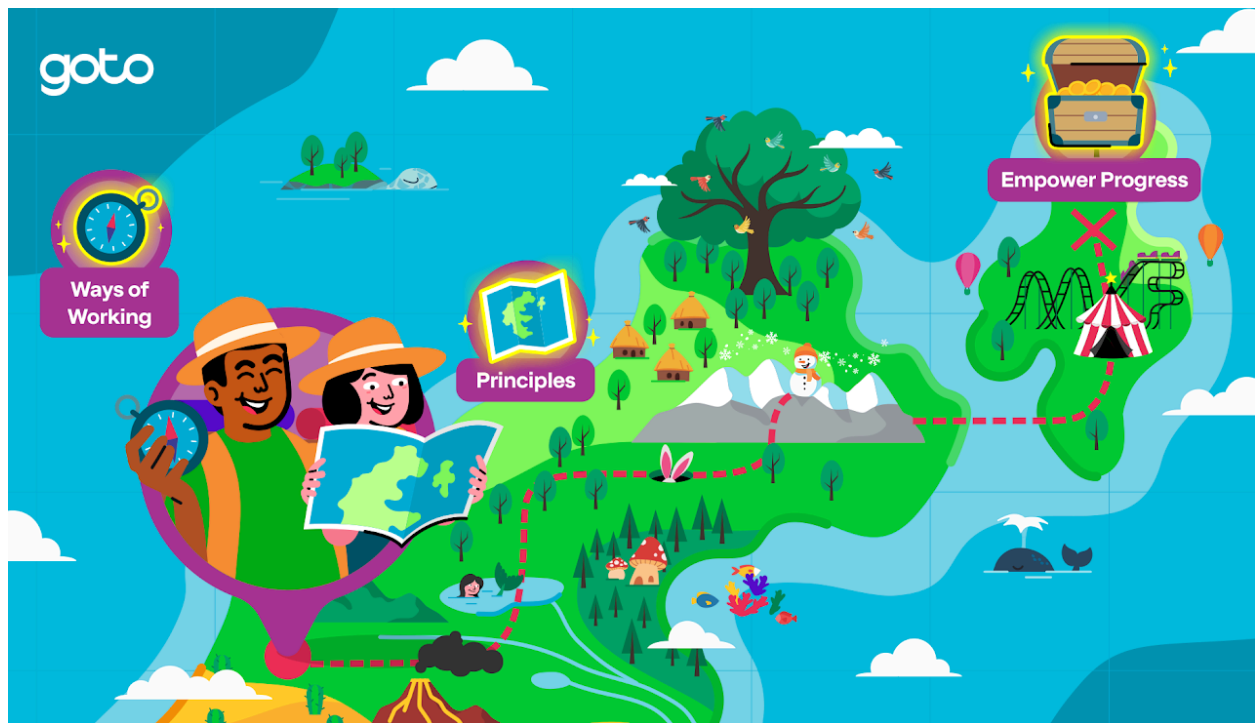
A Glimpse of What We Do

PT GoTo Gojek Tokopedia Tbk, its subsidiaries and its affiliates, (hereinafter, the “**Company**” or “**GoTo**”) has an ecosystem that comprises of on-demand services such as mobility, food delivery, and logistics, e-commerce services like third-party marketplaces, official stores, instant commerce, interactive commerce, and rural commerce, and financial technology services that include payments, financial services, and technology solutions for merchants. Our products and services are available across Gojek, Tokopedia, GoTo Financial and GoTo Logistics.

We believe our ecosystem is unique in empowering different groups to benefit from each other in a comprehensive and complementary way. Our ecosystem has strong self-reinforcing network effects that benefit each participant, who in turn is invested in the ecosystem's continued success. This symbiosis drives our growth as the market leader across the platforms we operate on. We strive to use this scale to continuously improve our business and enable more people to prosper in the digital economy.

Our mission is to #empowerprogress to the millions of people in our ecosystem and community. And we do this by staying true to our Principles and embodying our Ways of Working.

Our commitment to shared success is reflected in our tagline, "Go Together, Go Far." We believe that the success of GoTo should extend to everyone within our ecosystem, including our stakeholders. By working collaboratively and ensuring that everyone benefits from our existence.



GoTo Principles

Our principles define who we are as a company, as one GoTo.



Our Customers Come First. We achieve this by providing the best experience, value, assortment, and convenience in everything we do for our customers



We Prosper Together with Our Stakeholders. Our commitment to shared success is reflected in our tagline, “Go Together, Go Far.” Ensuring that everyone in our ecosystem can benefit from our success will enable us to become a company that can endure long into the future.



We are Hungry to Win. To succeed in all areas of our business, we will execute faster and sharper while remaining agile and innovative as a responsible world-class tech company that can do more with less.

Ways of Working

Our Ways of Working define how we act and behave as a commitment to our principles.

These unified Ways of Working for GoTo Group serve as a compass for us as people in GoTo to support our mission to Empower Progress.



We do what’s best for all of GoTo. We think like owners of GoTo. Owners are performance-driven and accountable in not just one but all aspects of the business. We work as a 1GoTo team in strategizing and planning carefully, solving problems swiftly, communicating frequently, and prioritizing for what’s best for all of GoTo.



We treat people with respect. We show this by being open to others' perspectives; transparent with opportunities and mistakes, as well as each other; and understanding of the varying needs of each individual.



We aim high responsibly. We execute with excellence and efficiency, relentlessly pursue innovations, and deliver exceptional solutions. And we do so by adhering to the highest standards of ethics and integrity.

Know About the Code

GoTo believes that the success and sustainability of our business depends largely on how we behave and run the business. Doing the right thing by following the applicable laws and regulations, working with integrity and treating each other with respect is our way to realize the core values to be an agile and compassionate company.

Our commitment to act ethically and responsibly is reinforced through our Code of Conduct (the “**Code**”) as a center of everything in doing our work. This Code serves to remind us and guide us to always use our good ethical judgment in every situation. In this way, we can conduct business according to the highest level of integrity and ethical standards and to build a culture of trust for our business sustainability.

Who Must Follow the Code?

The Code applies to all members of the Board of Directors, the Board of Commissioners, officers, employees (permanent or non-permanent, regardless of location) (collectively “**Company Personnel**” or “**You**” whenever required by the context), including its affiliates. In addition, the principles of the Code also apply to all related third parties, including but not limited to contractors, drivers and business partners, consultants and others of any representative who may be associated with GoTo to perform work or services are expected to follow the Code.

Violation of the Code

GoTo has zero tolerance for unethical business conduct. We take things very seriously for every instance of non-compliance with the Code. The Company will impose disciplinary actions up to and including dismissal or termination for a verified violation report of the Code, such violation may also be subject to certain administrative and/or civil and criminal sanctions as provided under the applicable laws and

regulations. For further provisions on disciplinary actions, you may refer to the relevant policy regarding disciplinary and corrective action.

Know Your Responsibilities

As part of the Company, we are all responsible for understanding and complying to the Code as well as to the Company policies, procedures, and applicable laws and regulations that apply to the work that we do.

In doing our daily work, we must play an active role in creating an environment that is free from unethical behavior. Be a role model by always being honest and using our good ethical judgment in our business dealings internally and externally.

All Company Personnel should actively demonstrate the highest level of quality and ethical standards at all times. It is important for everyone to create an environment where all team members can speak up and raise their concerns. Company Personnel are required to listen and report improper behavior or misconduct and never engage in or encourage retaliatory behavior.

The Code may not have all the answers to every situation, hence it is our responsibility to seek guidance from the appropriate Company function. When encountering any suspected unethical behavior or misconduct that occurred in the workplace, we must speak up and report it.



Speak Up

Part of building a culture of trust is by daring to speak up when something is not right. If You see or suspect any violation to the Code, choose any of the reporting options you are most comfortable with, by providing truthful and accurate information about your concern - whichever option you choose, we will take appropriate actions to protect your confidentiality as best as possible:

- You can submit the report through our Speak Up portal, either by website or phone:
 - Website: <https://gato.ethicspoint.com>
 - Phone: Locate the toll free number for your location on **gato.ethicspoint.com**
- People and Culture (PAC) team, including your People Business Partners (PBPs) and the Employee & Industrial Relations (ER/IR) team
- The Ethics and Compliance (E&C) team, who are designated to handle any queries related to the code of conduct and internal investigations
- Your manager or any leaders in the Company

The Speak Up portal is a 24/7, confidential and anonymous phone and online reporting system. It is managed by an independent third party and is available to all GoTo Group employees and all GoTo's third parties to report any breaches of the Code they observed. Breaches of the GoTo Group Codes of Conduct by any of GoTo's third parties may also be reported. Phone numbers for the Speak Up portal are available for all employees to speak to a representative in their native language. The phone lines are

staffed by specially trained third-party representatives, with translators to support your local languages. Web-based reporting is also available. Data supplied in a report is maintained on secure servers maintained by the third party who administers the Speak Up portal. Reports are accepted anonymously where permitted by law. Your reports will be reviewed and addressed according to our Whistleblowing Policy. Whistleblowing reports are treated seriously, with full confidentiality, and will be resolved in line with applicable Company policies, and applicable laws and regulations.

Non- Retaliation

Non-retaliation means that persons submitting a whistleblower report will not be punished for reporting a violation or suspected violation. GoTo does not tolerate any form of retaliation against anyone who makes a report in good faith. If You feel you are facing retaliation for submitting a report, please submit a report through any of the Speak Up channels mentioned above.

Learn More:

[Whistleblowing Policy](#)



- ① Call the Speak Up Portal to report a concern. We maintain the confidentiality of every call as best as possible through the process.
- ② Your call is answered by a third-party representative who specializes in hotline calls, who can converse with you in your local language or get your concerns translated.
- ③ The representative will ask details about your concern or question. Subject to local law, you may choose to stay anonymous and/or decline to provide answers to any questions. At the end of the call, you will receive a report ID number that you can use to check on the status of your matter or provide additional relevant information.
- ④ The representative then notifies the GoTo Speak Up team that a new concern has been raised, relying your concerns and supporting documents to us.
- ⑤ The GoTo Speak Up team reviews the matter and assigns it to an appropriate internal investigator(s) for follow-up, which may include reaching out to you for more information if you have shared your identity or correspond with you on the Speak Up Portal if you chose to be anonymous.
- ⑥ GoTo will take appropriate action. Often, we are unable to share details about the resolution with you to respect and preserve confidentiality for all people involved.

The Internal Investigation Process

No employees should initiate or conduct investigations relating to any concern or allegation of misconduct or violation of the Code on their own. Depending on the nature and seriousness of the allegation, the internal investigation may be conducted by the Ethics & Compliance Team, People & Culture Team (People Business Partner and Employee & Industrial Relations), Workplace Management Team or other internal investigative functions.

If the internal investigation processes aren't followed, or if someone begins an investigation without the authority to do so, there is a greater risk for errors that may compromise confidentiality, violate the law, damage our reputation, jeopardize GoTo's internal investigative process or undermine a fair investigation. Having the experts evaluate allegations and determine the appropriate function to investigate helps prevent missteps and ensures a thorough and fair process.

To that end, it is the role of all managers who receive concerns of misconduct or violations of the Code from employees to report those allegations using an appropriate Speak Up channel, including the Speak Up Portal, People & Culture Team or the Ethics & Compliance Team. It is incredibly important for GoTo employees to cooperate with ongoing internal investigations to ensure that relevant facts are discovered and evaluated. If requested, please cooperate fully and provide complete and timely answers to questions and comply with document and information requests by GoTo's internal investigators. In some cases, GoTo is legally required to report an investigation either internally or externally.

FAQ ...

- *Why is it important to speak up?*

When you speak up, you are protecting yourself, your colleagues and GoTo. Seeking help is always the right thing to do. Choose any of the Speak Up channels that you are comfortable with, and your concern will be investigated thoroughly and we will take appropriate actions to protect your confidentiality as best as possible. GoTo does not tolerate any form of retaliation and will investigate the retaliation towards any employee who has spoken up in good faith.

- *I feel unsure about reporting a concern about someone in a leadership position. I don't want them to find out I said something. What should I do?*

It's important to voice your concerns, no matter who the person in question may be. GoTo takes all appropriate actions to protect the identity of someone sharing information, as well as the confidentiality of the information being shared. You may report your concern using the Speak Up portal and choose to remain anonymous, where permitted by law.

I. Respect Each Other

GoTo has a zero tolerance policy towards any form of harassment and prohibits discriminatory practices that may distress or inhibit a member of Company Personnel.

In creating a supportive work environment, where all Company Personnel have the opportunity to realize their fullest potential, we uphold the core principles of fairness, transparency, and accountability. In line with such core principles, we are committed to create a work environment free from discrimination, bullying, harassment, and any form of violence. All parts of the Company are expected to participate in creating a respectful and caring workplace.



Our company is committed to upholding human rights and ensuring that forced labor is not tolerated within our operations or supply chain. We recognize that forced labor is a violation of fundamental human rights and is incompatible with our values, principles, and ways of working.

1. Equal Opportunity Employment

As we all come from different backgrounds, GoTo is committed to mutual respect and embracing diversity. Employment (hiring, promoting and compensating) is based solely upon individual merit and qualifications directly related to professional competence.

We respect and value Company Personnel from all backgrounds, regardless of race, color, gender, political opinion, ethnicity, national or social origin, ancestry, socioeconomic background, pregnancy status, marital status, age, sexual orientation, religion, mental or physical disability, medical condition, personality, and work experience, which has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. We have to ensure that people of diverse backgrounds feel welcome, engaged, valued and safe to bring their best and authentic selves to work every day. Creating a diverse, equal and inclusive culture makes us a more innovative, productive, resilient and responsible Company.

2. Discrimination and Harassment

GoTo does not tolerate any form of unlawful discrimination and harassment. Our Company environment is characterized by mutual trust and the absence of intimidation, oppression and exploitation. Our group-wide Prevention of Workplace Discrimination and Harassment policy and the supporting mechanisms ensure that all Company Personnel are protected, no matter where they are working. For our partners and users, we are committed to raising awareness of the different types of harassment, and ensuring our ecosystem has the right protective mechanisms to eliminate it altogether.

If You believe you are being or have been discriminated against or harassed by anyone at the Company, or by our business partners, immediately report the incident using one of the Speak Up channels mentioned above.

Company Personnel who knowingly allow or tolerate discrimination, harassment or retaliation, including the failure to immediately report such misconduct to People and Culture Team, or any of the

Speak Up channels mentioned above, are in violation of this policy and subject to disciplinary or corrective actions.

*) Discrimination & Harassment: *behaviors using any medium verbal, electronic, visual, gestural, written or graphical, physical that tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass or another or that create an intimidating, hostile, or offensive work environment.*

3. Workplace Health & Safety

We are responsible for establishing a safe, secure and hazard-free place to work. Violence of any kind is prohibited. Any behavior that threatens the safety and security of Company Personnel, our partner and users is not acceptable. Weapons of any kind (e.g. knives, blunt heavy objects), drugs and alcohol, smoking/ vaping/ ecigarettes at non-designated areas are prohibited in the workplace . If You are in a situation where there is a risk to the safety and security of you or anyone else, contact the Workplace Management function, or any of the Speak Up channels mentioned above immediately.

4. Drugs and Alcohol

Company Personnel are required to comply with the prevailing laws and regulations in their relevant jurisdiction in relation to the use and/or possession of drugs and alcohol. All Company Personnel are advised to avoid anything that jeopardizes their and others' security, health and safety.

If You suspect that a member of Company Personnel is under the influence of drugs or alcohol during working hours that is, or has the potential, to adversely affect that person's job performance or the safety of others in the workplace, make an immediate report to the People and Culture Team, or any of the Speak Up channels mentioned above.

Learn More:

- [Prevention of Workplace Discrimination and Harassment Policy](#)
- [Workplace Management Health & Safety Policy](#)

FAQ ...

- *What should I do if my colleague verbally abuses me?*

Harassment may take the form of words, gestures, or actions that tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate, or embarrass another or that create an intimidating, hostile, or offensive work environment. If you feel uncomfortable with the actions done by your colleague, you can speak up through the Speak Up channel.

- *May I drink alcohol in the office?*

In some countries, drinking alcohol in the office may be culturally inappropriate. In any event, drinking to the point of impairment is never tolerated. Never drink in a way that leads to inappropriate behavior, endangers the safety of others, or violates the law.

II. Avoid Conflicts of Interest

In principle, a conflict of interest arises when there is a conflict between the interests of GoTo and the personal interest of the Company Personnel, which will benefit the relevant Company Personnel.



An example of conflict of interest occurs when You are in a situation where the course of action You take brings an incentive for You, or can benefit yourself and/or your affiliates, but is at the expense of the Company or of our users.

Company Personnel are required to avoid circumstances which may lead to an actual, perceived or potential conflict of interest which include, but are not limited to direct or indirect incentives, personal investments, outside employment or business opportunities, and inventions, patents, or trademark registrations. In addition, Company Personnel must also be aware of the potential conflicts of interest which may arise from their close personal relationships.

Upon becoming aware of a possible or actual conflict of interest, You are required to immediately report and disclose such conflict using the disclosure process mentioned in our Conflicts of Interest Procedure.

1. Personal Investments

Refrain from making personal investments in companies that are our competitors (whether direct or indirect) or business partners when the investment may cause, or appear to cause, You to act in a way that could jeopardize the Company.

Company Personnel must:

- Always consider their shareholding and the influence over the management or control they may have over an outside company and its potential to trigger a conflict of interest.
- Not undertake a personal investment that creates a conflict of interest with our Company.
- Upon becoming aware of a potential or actual conflict of interest as a result of personal investment Company Personnel must immediately disclose their shareholding and/or investment which creates conflict of interest to the appropriate Company function for assessment.

2. Outside Work

In principle, Company Personnel are required to avoid accepting employment outside the Company, including but not limited to, advisory positions or board seats with other companies, including our competitors or business partners in a way that could harm the Company.

Board positions come with fiduciary obligations that may give rise to conflict of interest, Company Personnel must notify and declare it to the appropriate Company function before accepting a board position with any outside company. Finally, do not start your own business if it may compete with the Company, also bear in mind that business opportunities discovered through your work within the Company belong first to the Company, except as otherwise agreed to by the Company.

3. Inventions

Developing or helping to develop outside inventions that relate to Company's existing or reasonably anticipated products and services, relate to your position at the Company, or are developed using Company corporate resources, may create conflicts of interest and be subject to the Company's Confidential Information. If You have any questions about potential conflicts or intellectual property ownership involving an outside invention or other intellectual property, please consult through asking a question to compliance@gotocompany.com.

4. Close Personal Relationships

Certain close personal relationships between Company Personnel and their friends (including co-workers), family and relatives have the potential to affect performance, objectivity, fairness and integrity in work relationships and decision-making and the fulfillment of their responsibilities at our Company. This can negatively impact GoTo's ability to recruit and retain employees and otherwise diminish GoTo's reputation for ethical and fair conduct.

Company Personnel must always be mindful of the impact of their close personal relationships towards Company Business and their potential to give rise to conflicts of interest. Business decisions must not be influenced by any close personal relationship whether familial, romantic or otherwise or by membership in any social, religious or political association.

In case of doubt or upon becoming aware of a potential or actual conflict of interest, Company Personnel need to consult through asking a question to compliance@gotocompany.com.

Learn More:

- [Conflicts of Interest Policy](#)
- [Conflicts of Interest Procedure](#)

FAQ ...

- *My manager is having a romantic relationship with someone in their reporting line. Is that OK?*

No, it is not OK and GoTo discourages such relationships due to conflicts of interest. While GoTo respects the privacy and personal life of its employees, we should avoid any misunderstandings, complaints or perceptions of favoritism – anything that might disrupt the workplace – that can result from romantic relationships between a manager and an employee that the manager supervises. Managers who are entering into a relationship with an employee in their line of reporting must disclose the relationship to their People Business Partner, who will then recommend steps to help resolve the matter appropriately. Always keep in mind that regardless of reporting structure, romantic relationships between employees should not cause disruption or have a negative effect on the work environment or create a conflict of interest for either employee involved.

III. Protecting Confidentiality

Be careful to avoid the inadvertent disclosure of confidential information (as defined below) belonging to the Company, our business partners or other related third parties. GoTo’s responsibilities extend beyond not revealing confidential information but to proactively ensure its safeguarding in accordance with applicable laws and regulations and to the highest standard possible in the industry.



1. Confidential Information

Confidential Information (hereinafter “**Confidential Information**”) refers to any information relating to the Company which is not intended for public use or use outside of GoTo including but not limited to commercial, financial or technical information or information relating to users, Company Personnel, business partners and other related third parties. Confidential Information must at all times be kept confidential pursuant to all applicable laws and regulations as well as industry best practices.

To ensure the protection of Confidential Information, the following requirements must be adhered to:

- Company Personnel must protect the Confidential Information owned by or entrusted to the Company and are prohibited from disclosing such information without valid authorization, ensuring appropriate safeguards and prior due diligence. Any handling of Confidential Information must take into consideration the protection of the Company’s competitiveness and its reputation.
- Any disclosure of Confidential Information must be done on a “need-to-know” basis subject to a duly executed and binding non-disclosure agreement with an emphasis on minimal necessary disclosure.
- Confidential Information may also be subject to other legal rights such as but not limited to intellectual property and personal data protection rights and must be protected according to those standards.
- Company Personnel are required to exercise prudence and good judgment in preventing the inadvertent disclosure of proprietary and Confidential Information.
- We are committed to fair and ethical competition in our business and do not make use of Confidential Information relating to our competitors that is not disclosed in good faith.

2. Social Media and External Communications

We are all proud of our Company and it is natural that we might want to share the great things we are doing but only share and amplify data and information that has been approved by Corporate Affairs.

Even if information is positive and not considered confidential only share it if it has been approved by Corporate Affairs or if the latter has released the information publicly (in a media release, or on a post on our official sites, for example), and ensure to cite any sources that you use

In addition to restricting your Social Media posts and public conversations about GoTo to pre-approved content, the following must be taken into account:

- Always be mindful and aware that we have a large number of direct and indirect stakeholders who may interpret conversations about our Company differently.
- Do not engage in negative discussion topics or arguments on social media or the internet (Do not let yourself be trolled).
- Do not share or post anything that may be detrimental to GoTo's business and/or its reputation.
- Refrain from engaging in discussions outside your area of expertise.
- Rectify or remove any false or misleading information or content about GoTo, if You cannot rectify such content, please alert the Corporate Affairs team.

With regard to speaker engagements, refrain from giving statements and remarks on behalf of the Company to the press, other forms of mass media, or any private sector or public sector organization without prior valid authorization from Corporate Affairs. Prior to accepting an invitation or any public speaking engagement representing the Company, always seek valid authorization from Corporate Affairs.

3. Personal Data Protection and Privacy

Personal Data (hereinafter, "**Personal Data**") refers to any information or data , whether true or not, about an individual who can be identified from that data, or from that data and other information to which GoTo has or is likely to have access. For the avoidance of doubt, Personal Data may include personal information on our users, Company Personnel or even potential employees, as well as related third parties.

In the course of the Company's business, we collect, process and store Personal Data from data subjects and Company Personnel from multiple legal jurisdictions. Company Personnel are required to handle this data with due care and in accordance with applicable laws and regulations, as well as the Company's policies and procedures.

To ensure the adequate protection of Personal Data, full compliance is required in regards to the following:

- Company Personnel are required to ensure that any activities within the Company related to Personal Data including but not limited to its collection, use, processing, transfer, storage and deletion comply with the applicable laws and regulations as well as internal Company policies.
- All activities related to Personal Data shall be conducted in accordance with data protection principles and based on valid, informed and freely given consent from the relevant data subjects.
- Personal Data of a sensitive nature, such as but not limited to health data, financial information and religious and political affiliations are subject to stricter requirements both at the regulatory and internal policy level, which must be complied with at all times.
- Any use of Personal Data shall be consistent with the specific purpose it was consented to upon collection and shall be limited to the minimum, as necessary, to fulfill the specific purpose.
- The protection of Personal Data, its integrity and confidentiality from unauthorized access, modification, loss or inadvertent disclosure shall make use of the appropriate structural and technical measures available to the Company.
- Company Personnel are required to report any potential loss, misuse or unauthorized use of Personal Data to the Data Protection and Privacy (DPPO) team, expediently and without delay upon becoming aware of such occurrence.

Learn More:

- [Information Security Policy](#)
- [Corporate Affairs Policy](#)
- [Social Media Policy](#)
- [Personal Data Protection Policy](#)

FAQ ...

- *Can I download or move the company's file to my personal Google Drive?*

Any data/information saved on the Company's network, workspace and/or laptop are considered the Company's assets, and are by default considered confidential in nature. Downloading or sharing any data/information that are stored on the Company's network, workspace and laptop will trigger our internal procedures to assess if those activities breach your employment agreement with the Company and our [Information Security Policy](#). If you are unsure how to retrieve personal files saved on the Company's network, workspace and/or laptop, please contact itp@gotocompany.com for advice before proceeding, to prevent any violation of the Company's internal policies and procedures.

- *I was asked to be on a panel discussion at my alma mater. No media will be there, and just a couple dozen students will be in attendance. Am I OK just accepting the invitation?*

While it seems to be a great opportunity for you, there are some steps you need to take to make sure it's OK to accept the speaking engagement. To obtain approval, submit a request to the Corporate Affairs team for review and approval before proceeding.

IV. Protecting Company Assets



Company Personnel have the responsibility to use and protect Company assets (tangible or intangible) and resources. Our ability to protect and conserve Company resources, information and ideas help GoTo to move fast, keep innovating, and create real value for our users.

1. Intellectual Property

GoTo's intellectual property rights, including but not limited to, patents, trademarks, industrial design, regulatory data, copyrights, trade secrets, "know-how", domain names, logo and related rights are among our most valuable assets that are protected under applicable intellectual property laws. Unauthorized use of such rights may lead to certain loss and/or damages to GoTo.

In order to protect GoTo's intellectual property all Company Personnel must, at all times:

- Safeguard and protect the Company's intellectual property rights at all times.
- Comply with applicable laws and regulations, as well as Company policies regarding intellectual property. where our business is established and operationalized.
- Report any suspected misuse of the Company's intellectual property, using any of the Speak Up channels mentioned above.
- Respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose GoTo and the involved personnel to civil and criminal sanctions. In this matter, Company Personnel is advised to seek advice from the appropriate Company function prior to soliciting, accepting or using proprietary information from others or letting others use or have access to Company's proprietary information.

2. Company Property

All Company Personnel must care for and maintain the Company's physical and electronic assets (hereinafter, "**Company Property**"). For the avoidance of doubt, Company Property includes but is not limited to the physical space where You work, the equipment and office supplies, and the data resources You access. Any Software, hardware, e-mail, computer files, content and programs You create, receive, send or store are also considered Company Property.

In line with applicable laws and regulations, GoTo reserves the right to monitor the use of Company Property in the course of Company Business and when there is a specific requirement, such as but not limited to protecting Company Personnel and users, maintaining the security of resources and other property, or investigating suspected misconduct by Company Personnel.

Company Property must always be strictly used for their designated purpose in the course of Company Business. Company Personnel are responsible for ensuring that Company Property entrusted to them is used appropriately and securely.

Learn More:

[IT Asset Management Policy](#)

[Asset Management Policy](#)

FAQ ...

- *I took a video of my friends throwing a ball around the office, but I can clearly see our proprietary source codes written on the whiteboard. Can I still post it to Instagram?*

No. Our Information Security and Social Media policies require us to play it safe with regards to online posting.

- *May I download illegal movies from the internet using the Company's laptop?*

No. You must only use the company's property for work purposes and you are also responsible for ensuring that the laptop entrusted to you is used appropriately and securely.

V. Ensure Financial Integrity and Responsibility

GoTo honors the practice of appropriateness, transparency, and accuracy in all of its business dealings. All expenditures made by GoTo are accurately reflected in the Company's financial records and all payments made with Company funds, or on behalf of the Company, have been properly authorized.

Company Personnel must follow all applicable standards, principles, laws and practices for financials recording and reporting. Company Personnel must be timely and thorough when preparing all the financial records and reports required by the appropriate Company function. In particular, Company Personnel should ensure that no part of any payment is to be made for any purpose other than as fully and accurately described in GoTo's books and records. Company Personnel should use best efforts to ensure that all transactions, dispositions, and payments involving Company funds or assets are properly and accurately recorded in the Company's financial records. No undisclosed or unrecorded accounts are to be established for fraudulent purposes. Personal funds must not be used to accomplish what is otherwise prohibited by the Code.



Learn More:

- [Global Business Travel Policy](#)
- [Expense Management Policy](#)
- [GoTo Procurement Portal](#)

FAQ ...

- *May I request reimbursement for my business meals expense with a third party without proper invoice and documentation?*

You are responsible for all the required documentation, which supports the Company's financial expenses being spent appropriately and responsibly. Accordingly, reimbursement or any Company expenses must be properly documented and recorded. In this case, reimbursement without proper invoice and documentation is not allowed.

- *What are my responsibilities for internal control?*

You are responsible for performing internal control activities that support the company's objectives. These objectives include providing reasonable assurance that ensures the effectiveness and efficiency of the company's operations, reliable, timely and transparent internal and external financial and non-financial reports and also compliance with relevant laws and regulations. In order to meet these objectives, internal control activities should be well documented to ensure accessibility and traceability.

VI. Obey the Law

We are committed to conducting all aspects of our business in line with the highest legal standards. GoTo takes its responsibilities to comply with the prevailing laws and regulations very seriously and each Company Personnel including its affiliates is expected to understand and comply with the provisions set herein and applicable legal requirements and prohibitions. While it is impossible for anyone to know all aspects of every applicable law, You as Company Personnel should understand the major laws and regulations that apply to your work. A few specific provisions of applicable laws and regulations are prone to unintentional violation and so are worth pointing out here:

1. Anti Bribery & Anti Corruption



Not only is bribery unethical and against GoTo's principles, policies and procedures, it may also expose GoTo, as well as Company Personnel to the risk of prosecution, fines and other penalties, reputational damage, as well as increasing the cost of doing business. We have a strict "zero tolerance" policy towards bribery and corruption by anyone involved in our business. Our stance is that it is better not to do business at all than to engage in corrupt or unlawful business. You as Company Personnel, including your affiliates, must conduct your work activities in full compliance with all applicable anti-bribery and anti-corruption laws, including the relevant Company anti-bribery and anti-corruption policies and procedures.

A. Anti-Bribery, Kickbacks, and Facilitation Payments

Company Personnel, including their affiliates, must not offer, promise, pay, solicit, receive or accept any bribe, kickback, facilitation payment, or other improper payment for any reason whatsoever. The direct or indirect offer, promise, payment, solicitation or acceptance of such improper payments in any form by Company Personnel and/or their affiliates, is unacceptable.

B. Gifts, Meals, and Entertainment

As a general matter, GoTo competes for and gets business through the quality of its products and services, and the capabilities of its personnel, rather than through gifts, meals, or entertainment to its customers or other persons.

The provision of gifts, gratuities, or other favors to any individual or entity (in the private or public sector, including Government Officials) that has the potential effect of directing business to, or retaining business for GoTo is generally prohibited. However, gifts of modest or insignificant value that meet certain conditions may be allowed, on the basis that such gifts are unlikely to have any improper effect.

Common sense and moderation should prevail in business entertainment (and in incurring travel and lodging expenses while on Company business). Company Personnel may incur

entertainment expenses only if the entertainment is infrequent, modest and is not intended to help the Company secure an illegitimate advantage. Meals, entertainment, travel and lodging must never be offered as a means of influencing another person's business decisions. Such expenses can be incurred only if it is appropriate and reasonably proportionate to the business relationship and offered transparently in the course of that business relationship. The primary purpose of having the meal, entertainment outing or trip must be in the context of relevant business and build cordial business relations.

C. Employment and Internships

On occasion, Government Officials or business partners of GoTo may request that the Company consider giving internships or employment to certain individuals. An internship or employment is an item of value and thus, the offer of employment or of an internship to any person who is related to a Government Official or to a business partner of the Company may potentially be viewed as a bribe offered to the Government Official or the business partner of the Company (as the case may be).

As a general matter, GoTo will award employment and internships on the basis of qualification and merit only. In any situation involving a potential candidate who is related to any Government Official or business partner of GoTo, GoTo must conduct certain measures to determine and document the appropriateness of the hiring.

D. Political Contributions and Charitable Donations

GoTo does not make political contributions or payments to political candidates, political parties or political committees. Company Personnel may not make charitable donations, whether in their own name or in the name of GoTo, if this is aimed at obtaining or retaining business or at gaining a business advantage.

E. Sponsorship

Any sponsorship in GoTo's name can only be made in accordance with the policy and procedure of the Company. Company Personnel must never contact users, customers, suppliers or other business-related contacts to seek sponsorship in a personal or non-work capacity, unless explicitly pre-approved in writing by the appropriate approvers.

F. Relationships with Third Parties

Third parties represent a key risk area for bribery and corruption. Anti-corruption laws prohibit both bribes offered or given directly by a person, as well as bribes offered or given indirectly through a third party acting for or on behalf of the person. Therefore, Company Personnel must avoid situations involving any third party where a bribe could be made through that third party.

Learn More:

- [Anti-Bribery & Anti-Corruption Policy](#)
- [Charitable Donations Procedure](#)
- [Gifts & Entertainment Procedure](#)
- [Political Engagement Procedure](#)
- [Sponsorships Procedure](#)

2. Anti Money Laundering & Combating the Financing of Terrorism



GoTo is committed to fully comply with Anti-Money Laundering and Combating The Financing of Terrorism laws and regulations in conducting its business operations. GoTo has policies and procedures in place to safeguard the institution's fund are used solely for their intended purposes and not diverted for such uses as laundering money or financing terrorism for any kind of criminal activities, and take the necessary actions required to prevent, detect and report to the relevant authorities within the framework of applicable laws.

Company Personnel as well as its affiliated parties are prohibited from participating in or facilitating money laundering or financing of terrorism. Any Company Personnel involved in money laundering and/or financing of terrorism activities, even if unintended, may be subject to civil and criminal sanctions against such person and the Company.

Learn More:

- [Anti-Money Laundering & Combating the Financing of Terrorism Policy](#)

3. Related Party Transaction

In principle, any transaction carried out by GoTo involving related parties or affiliates shall be conducted in accordance with the applicable laws and regulations, including but not limited to the rules issued by the Financial Services Authority of Indonesia (*Otoritas Jasa Keuangan*), as applicable.

The following principles must be observed by the appropriate Company function when entering into related party transaction:

- implementing the principles of Good Corporate Governance, including but not limited to transparency, accountability, responsibility, independence, and fairness;
- ensuring that the transactions are conducted on an arm's length basis¹;
- all proposed related party transactions that fall outside the exempted list shall fulfill the specific requirements and procedures as provided under the prevailing laws and regulations; and
- all documents related to the implementation of procedure must be kept for a document retention period in accordance with the provisions of laws and regulations.

All proposed related party transactions must undergo internal assessment to ensure corporate benefit and arms length of the transaction. When the Company intends to enter into a transaction with related

¹ As defined by the OECD; which sets guidance for international best practices for tax and transfer pricing and is widely adopted by tax authorities worldwide. OECD means Organization for Economic Cooperation and Development.

parties, any plan and information related with such transaction shall be disclosed and submitted to the appropriate Company function to be reviewed and assessed.

Learn More:

- [Related Party Transaction Policy](#)

4. Insider Trading



GoTo's Company Personnel are free to invest in and hold securities (including shares or bonds or any other type or securities) which are issued by GoTo, as a long term and non speculative investment. However, these investments must be carried out in accordance with the applicable capital market laws and regulations.

As a general matter, Company Personnel including its affiliates are prohibited from trading securities based on Confidential Information and/or material information of GoTo that has not been officially published or is not nor has not been considered public information (“MNPI”).

Company Personnel including its affiliates who have access to confidential information and/or MNPI are not permitted to use or share that information for securities trading purposes or for any other purpose except the conduct of the Company's business.

For the purpose of insider trading, MNPI means important and relevant information that may affect the securities price of GoTo and/or the decision of the investor to purchase or sell securities of the Company.

Learn More:

- [Insider Trading Policy](#)
- [Insider Trading Procedure](#)

5. Antitrust and Competition

GoTo conducts business fairly and honestly in compliance with all applicable antitrust and competition, as well as other applicable laws and regulations which promote fair and open competition. GoTo strives to keep integrity in all of its business arrangements and relationships.

In principle, the guideline on antitrust and competition seeks to prevent the Company from violating competition rules which aims to uphold the efficiency of the market mechanisms. The guideline aim to:

- Prevent GoTo from forming cartels or monopolies and from abusing a dominant market position.
- Ensure that mergers and acquisitions are subject to proper scrutiny and comply with the rules, like submitting an acquisitions notification report in a timely manner.

- Ensure GoTo does not perform any discriminatory practices in which the Company imposes a different treatment to a particular party (e.g. to the Company’s driver-partner), without justified reason for imposing such discriminatory practice, and the discriminatory practice harms competition or consumers.

These anti-competitive practices often limit competition and take away incentives to innovate, reduce prices, improve consumer surplus, and create welfare for our partners (e.g. driver-partner and/or merchant-partner). Anti-competitive practices may also act as trade barriers that enforce exclusivity towards the competitors and vanishing the competition.

To adhere to the guideline, it is important to seek advice and guidance from the appropriate Company function, wherever and whenever we encounter a particular situation that may raise antitrust and/or competition matters.

Learn More:

- [Antitrust & Competition Policy](#)
- [Antitrust & Competition Procedure](#)

6. Trade Compliance & Sanctions

We comply with all trade laws and regulations that apply to GoTo. Compliance with trade sanctions requires that we know who we are doing business with, both directly and indirectly, for all GoTo transactions.

International trade laws, including those related to the U.S., may impact who GoTo can trade with. These laws are fairly complex. If you are in any way involved in cross border transactions from one country to another, work with your manager, and the specialist teams assisting in the screening of the third parties, to be sure the transaction stays within the bounds of applicable laws.

Learn More:

- [Trade Compliance & Sanctions Policy](#)

FAQ ...

- *May I give facilitation payment to a government official to expedite certain permit issuance?*

Absolutely no. GoTo has zero tolerance towards any form of bribery and corruption regardless of the jurisdiction of incorporation or locations of its operations. We will never trade our integrity for a business opportunity.

- *May we put a clause in the agreement with business partners where we prohibit business partners from having a similar agreement with the competitors without appropriate justification for the benefit of GoTo?*

Exclusive dealing (or exclusivity arrangement) occurs when a business entity, either individually or jointly with other business entities, prevents or hampers other business entities from conducting business activities in the same market or hinders customers from engaging with Competitors. This arrangement may be considered as anti-competition practice especially when there is no proper justification. Therefore, further consultation with the relevant legal team is required.

Speak Up Channels

GoTo offers a variety of speak up channels for more help and to report concerns.

Questions about the Code of Conduct or GoTo Group Compliance policies and procedures?

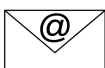
Not to be used for reporting a concern

Speak



- Your manager or any GoTo leaders
- People & Culture team member (People Business Partner, and Employee & Industrial Relations)
- Ethics & Compliance team member

Email



compliance@gotocompany.com

Want to report potential misconduct or ethical concerns?

You can report anonymously if you choose to

Speak



- Your manager or any GoTo leaders
- People & Culture team member (People Business Partner, and Employee & Industrial Relations)
- Ethics & Compliance team member

Visit



Web Portal: <https://gogo.ethicspoint.com>

Call



Call toll-free, available 24 hours a day, seven days a week

Translation services are available

Locate the number for your location on gogo.ethicspoint.com

Failure by employees to follow our Code or applicable laws, is a violation. Subject to local law, violation of this Code of Conduct may lead to corrective action up to and including termination of employment. Any amendment or waiver of our Code for executive officers or directors may only be granted by the Board of Commissioners, or a committee of the Board of Commissioners, and will be publicly disclosed, when required by law. GoTo reserves the right to make unilateral changes to our Code or GoTo policies at any time.