



GoTo Vendor Code of Conduct

Version 1.0

Table of Content

GoTo Vendor Code of Conduct	1
The Company	3
Section 1: Policy Introduction	4
Section 2: Code of Conduct Aspects	5
2.1 Economic	5
2.2 Product and Service Quality	5
2.3 Environmental	5
2.4 Social	6
2.5 Labour	6
2.6 Workplace Health and safety	7
2.7 Data Privacy and Security	7
2.7.1 Confidential assets and information (Protection)	7
2.7.2 Personal information and privacy	7
2.8 Ethics	8
2.9 Media	8
2.10 Conflict of Interest	8
2.11 Anti Money Laundering & Combating the Financing of Terrorism	9
2.12 Anti-Bribery & Corruption	9
2.13 Management System	10
2.14 Compliance	10
2.15 Contact Directories	11



The Company

GoTo is one of the largest companies in Asia that covers On Demand Service (Gojek), GoTo Financial (GTF) and E-commerce (Tokopedia) into one ecosystem. GoTo has a responsibility to ensure its supply chain operates responsibly and improves the lives of workers, their communities and the environment. GoTo is committed to making a positive contribution to human rights. We are guided by the International Bill of Human Rights, the UN Universal Declaration of Human Rights and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. GoTo supports the UN Global Compact, the [OECD Guidelines for Multinational Enterprises](#), the [UN Principles for Responsible Investment](#) and the [UN Principles for Sustainable Insurance](#), the [UK Bribery Act](#) and the [United States Foreign Corrupt Practices](#).



Section 1: Policy Introduction

GoTo has developed this Code for all Vendors and any Third Parties Sub-Contracted by Vendors. It is applicable to all Vendors appointed by any GoTo Function, Business or Individual working on behalf of GoTo.

GoTo looks to collaborate with transparent, ethical, environmentally and socially responsible vendors. Although we recognise our vendors are independent entities, their conduct has the potential to reflect on the GoTo Group. Due to the nature of our relationship with our vendors, it is our expectation that our suppliers will adhere to the minimum standards set out in this Vendor Code of Conduct.

All GoTo Vendors must comply with the GoTo Ethical and Environmental Code of Conduct for Vendors of Goods and Services. This includes:

- Vendors providing services to or on behalf of GoTo
- Third Parties Sub-Contracted by a Vendor
- Vendors' affiliates and their respective employees

At all times, our goal is to work collaboratively with our supply chain partners on sustainability towards improving the environmental and social performance of our procurement activities, reduce environmental and social risks, any breaches related to Labour, Anti Money Laundering & Combating the Financing of Terrorism, Anti Bribery & Corruption and Data Privacy & Protection laws. In those cases where a vendor or one of its subcontractors is found to not be in compliance with this Code, GoTo will work with the vendor on an improvement plan. If the vendor continues to be not in compliance with this Code, GoTo will take steps to review the terms of the contract, including reduction in the order and relationship termination.

GoTo will periodically review this Code and make revisions when needed, which we will expect vendors to adopt.

Section 2: Code of Conduct Aspects

2.1 Economic

Economic sustainability focuses upon bringing economic benefit to workers, investors and the communities in which a company operates. From an ethical perspective, commercial transactions should be economically beneficial to all parties involved and relationships should be based on the principle of fair and honest dealings, whilst promoting fair and sustainable development:

1. Vendors must embed basic business principles in a Code of Business Standards or a similar policy, and ensure that these policies comply with laws and regulations
2. All vendors must comply with national and international sanctions policies and legislation
3. Vendors must have reasonable and lawful payment policies with their own vendors and subcontractors
4. Vendors must consider the principles of the Circular Economy, Whole Life Costing and Life Cycle Analysis in design, manufacture and recycling/disposal

2.2 Product and Service Quality

Vendors must demonstrate a commitment to quality and apply appropriate product safety practices in compliance with applicable laws, regulations, industry standards and good manufacturing practices for all products and/or services provided to GoTo.

2.3 Environmental

Recognizing sustainable businesses need to consider environmental risks and minimize their environmental impact across their operations, GoTo expects its vendors while delivering the product and service quality to also support sound environmental management principles and reduce their impact on the environment within which they operate. In addition, GoTo's vendors are expected to support the development of sustainable technologies:

1. Vendors must always factor-in environmental/sustainability considerations appropriate to the size and nature of the vendor's operations that, where applicable, addresses preventing, mitigating and controlling serious environmental and health impacts from operations including raw material usage, greenhouse gas emissions, water, waste, air quality and biodiversity
2. Vendors, to the best of their efforts, should have an internal environmental management programme/system, with adequately trained staff responsible for managing the organisation's

environmental performance, and communicate accurate and timely data on key environmental indicators internally and externally

3. Vendors must abide by all applicable legislation and regulations related to the protection of the environment and the handling of dangerous and hazardous materials as well as obtaining all relevant environmental authorisation, including waste and emissions
4. If vendors keep any dangerous and/or hazardous materials they must minimise use, store safely and keep all hazardous material records that are necessary
5. If vendors have manufacturing facilities they must ensure the facility complies with environmental laws, including all laws related to waste disposal, air emissions, discharges, toxic substances and hazardous waste disposal
6. Vendors of goods or materials must validate that all input materials and components were obtained from permissible sources consistent with international treaties and protocols in addition to local laws and regulations

2.4 Social

The UN Guiding Principles on Business and Human Rights, state that all private enterprises hold an equal responsibility to respect human rights. GoTo is committed to protecting the human rights of all stakeholders in its ecosystem. GoTo expects vendors to respect the human rights of their employees and to comply with all relevant legislation, regulations and directives in the countries and communities in which they operate.

2.5 Labour

1. Vendors must prohibit the use of all types of slavery and forced and bonded labour and give workers, whether local or migrant, the right and the ability to leave employment when they choose
2. Vendors must ensure that child and underage labour is not used and that the employment of young workers adheres to International Labour Organization standards, the [OECD Guidelines](#) for Multinational Enterprises and local regulations
3. Vendors must ensure that wages meet the minimums as stipulated under local regulations and industry standards without unauthorised deductions
4. Vendors must ensure that working hours are in accordance with local regulation and industry practice and voluntary overtime is at manageable levels



5. Vendors must not discriminate against any group on religious, social, gender identity, sexual orientation or ethnic grounds or any protected classes covered under international human rights standards and such other ground as may be recognized under national law
6. Vendors must not hinder the right of workers to legally organise and join associations such as labour unions
7. Vendors must provide clear and uniformly applied disciplinary practices and grievance procedures that include provisions prohibiting mental, physical or verbal abuse
8. Vendors must uphold anti harassment principles within their working environment

2.6 Workplace Health and safety

1. Vendors must provide a safe work environment, abiding by local laws and regulations
2. Vendors must ensure health and safety is effectively managed, so that health and safety risks, issues, incidents and non-compliance are identified and addressed in order to provide adequate facilities to ensure the health and well-being of its workforce

2.7 Data Privacy and Security

GoTo requires its Vendors to protect the privacy of individuals and the security of assets and information deemed sensitive and confidential by GoTo.

2.7.1 Confidential assets and information (Protection)

Vendors must protect GoTo and its clients' confidential assets and information. Vendors must design, maintain and monitor controls and processes to provide appropriate protections for these assets and information.

2.7.2 Personal information and privacy

GoTo requires Vendors to protect Personally Identifiable Information (PII) in compliance with all applicable GoTo policies, local laws and regulations. PII data provided by or on behalf of GoTo should only be used, accessed, and disclosed as permitted by the Vendors agreement.

2.8 Ethics

1. Vendors must support fair-trade and ethical sourcing practices relevant to the commodity or service provided
2. Vendors must ensure that the source of Products/Services supplied to GoTo does not violate any relevant regulations or laws
3. Vendors must respect the human rights of the people and communities in which they operate and should strive to improve the lives of the people and communities in which they operate
4. Vendors must not engage in or support trafficking in human beings
5. Vendors must provide evidence that they have implemented due diligence procedures to manage ethical issues within their supply chain, including all labour-related processes to ensure they comply with laws on slavery and human trafficking
6. In addition to the requirements of the UK Equality Act 2010, GoTo's general principles are that vendors and their supply chain, contractors and service providers must ensure that they have robust procedures to ensure that they provide disability accessible products, services and opportunities. Vendors should:
 - commit to always prioritized skills and competencies based assessment
 - provide products and services that are accessible to disabled people
 - review their products and services with the involvement of disabled people
 - promote their commitment to disability issues externally
7. GoTo will not enter or will discontinue any business relationship with a Supplier or sub-contractor who is suspected and/or incriminated in trading smuggled, counterfeit and/or contraband products

2.9 Media

GoTo does not tolerate disrespectful or unprofessional usage of any media platform (whether or not such usage relates to GoTo, its business, employees or business partners) such as posting content that is abusive, malicious, obscene, threatening or intimidating, or that contains ethnic, religious, gender or other derogatory statements in any message or post.

2.10 Conflict of Interest

A vendor Conflict of Interest is a situation that has the potential to undermine the impartiality of a vendor, because of the clash between the vendor's self-interest, and the competitive tendering process conducted at GoTo.

- Vendors must avoid situations where their existing or potential business relationships may appear to compromise their responsibilities or ability to make sound, impartial and objective business decisions in connection with their contractual commitments to Goto.



- Vendors must adhere to any decision around the engagement with GoTo that is free from conflict of interest, which includes avoidance of personal or private interest.
- Vendor will not enter into any contract or agreement, or execute any document, which will create a Conflict of Interest or which will prevent it from freely performing any provision of the contract signed with GoTo;
- Vendor will contact the relevant GoTo procurement team if the vendor is in a position where it has an actual or perceived Conflict of Interest.

2.11 Anti Money Laundering & Combating the Financing of Terrorism

Vendors commit to comply with all applicable Anti-Money Laundering (“AML”) and Combating the Financing of Terrorism (“CFT”) laws and regulations. While acting on our behalf, we expect our vendors to:

- Not knowingly engage or attempt to engage in any transaction involving proceeds derived from unlawful activity.
- Immediately report to us any matter suspected to be related to money laundering or terrorist financing that has an impact on the Company .
- Not have dealings with designated individuals and entities (such as suspected terrorists or narcotics traffickers) who are subject to international sanctions.

2.12 Anti-Bribery & Corruption

1. Vendors understand that compliance with all applicable laws and regulations in relation to bribery and corruption (“**Anti-Bribery and Anti-Corruption Laws**”) is of utmost importance for GoTo and its affiliates. We have a strict “zero tolerance” policy towards bribery and corruption by anyone involved in our business.
2. Vendors must not, at any time, directly or indirectly:
 - Given, offered, promised, solicited, agreed to receive, received or accepted anything of value (include cash, gifts, forgiveness of a debt, loans, valuable security or other property or interest in property of any description, favors (personal or otherwise), services or advantages of any description, entertainment, meals or travel, political or charitable contributions, business or employment opportunities and medical care, among other items) to or from anyone in the public



or private sectors (including any *Government Official** or any commercial party) as an inducement or reward for improperly performing their role.

- Engaged in any activity, practice or conduct which would constitute an offence under the Anti-Bribery and Anti-Corruption Laws;
- Vendor have not been the subject of any investigation, inquiry or enforcement proceedings by any court, governmental, administrative or regulatory body or any customer regarding any offence or alleged offence under the Anti-Bribery and Anti-corruption Laws, and no such investigation, inquiry or proceedings have been threatened or are pending and there are no circumstances likely to give rise to any such criminal investigation, inquiry or legal proceedings, fraud and bankruptcy.

2.13 Management System

Vendors with whom GoTo has regular and recurring dealings should have good management and governance processes in place to ensure compliance with this Code. Furthermore, vendors must make reasonable efforts to monitor their supply chain, ensuring their vendors are aware of, and compliant with, the aims of the Code. Vendors must ensure that their systems and procedures are sufficient to mitigate any potential negative impact on GoTo's brand and reputation.

2.14 Compliance

GoTo operates a policy of transparency with vendors and will work collectively with vendors to ensure adherence to the Code and develop improvement programmes if required.

GoTo reserves the right to randomly review the vendor's policies, procedures or any other document related to adherence to this Code. In some cases, GoTo may require an on-line or on-site audit of a vendor's adherence to this Code during normal business hours once annually with at least 30 days prior written notice of its intention to conduct such an audit. This such audit will be conducted in a manner that avoiding any disturbance to the vendor's business GoTo employees or independent representatives will execute appropriate confidentiality agreements prior to such an audit.

Vendors acknowledges and agrees that the Contract may be terminated by GoTo and/or its affiliates (as applicable) if the Vendor has breached any of the representations, warranties and undertakings contained in this Vendor Code of Conduct, and that any such breach may result in referral of the matter to the relevant authorities.



Vendor further agrees to defend, indemnify, and hold harmless to GoTo and its affiliates, and their respective Representatives, from and against any claim, suit or proceeding arising out of any such breach.

GoTo requires vendors to acknowledge this Vendor Code of Conduct, thereby acknowledging the requirements contained within. GoTo requires vendors to agree to adhere to these requirements and to be able to demonstrate to GoTo how these requirements are being met. Each person acknowledging this Vendor Code of Conduct represents and warrants that he or she is duly authorised to execute and deliver this Vendor Code of Conduct. Vendor represents and warrants that the execution and delivery of this Vendor Code of Conduct have been duly authorised and that the acknowledgement made hereunder are valid and binds the Vendor.

2.15 Contact Directories

In the event that Vendors are aware and acknowledge any breach of the Vendor Code of Conduct and any potential or actual conflict of interest, it is required to disclose and/or notify immediately in formal written notification to respective functions below:

General inquiries: vendormanagement@gotocompany.com

Whistleblower: ethics@gotocompany.com