



Vendor Code of Conduct

Version 2.0

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A Glimpse of What We Do

PT GoTo Gojek Tokopedia Tbk and its affiliates (GoTo) is the largest digital ecosystem in Indonesia. GoTo's mission is to "drive progress" through technology infrastructure and solutions for everyone to access and thrive in the digital economy sector. The GoTo ecosystem provides a variety of services including mobility, food delivery, and logistics, as well as payments, financial services, and technology solutions for merchants. The GoTo ecosystem also provides *e-commerce* services through Tokopedia and banking services through a partnership with Bank Jago.

GoTo has a responsibility to ensure its Vendors operate 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.

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 applicable laws and regulations, working with integrity, and treating each other with respect is our way to realize the core values of being an agile and compassionate company.

Our commitment to act ethically and responsibly is reinforced through this Vendor Code of Conduct (the "**Code**") as the cornerstone of our operations. This Code serves to remind and guide our Vendors to always exercise good ethical judgment in every situation. By adhering to this Code, Vendors can conduct business according to the highest levels of integrity and ethical standards, fostering a culture of trust essential for our mutual business sustainability.

Vendors, including their affiliates, employees and subcontractors, who are providing products and services to GoTo are expected to understand and act in accordance with this Code. This includes aligning their guidelines, policies, practices, and ensuring compliance throughout their organization and its business activities. Vendors must demonstrate a commitment to legal, ethical, safe, fair, and environmentally responsible business practices. Vendors are expected to foster an inclusive culture and prohibit discrimination in any form. The Code represents the minimum threshold of legal, ethical, safe, fair, and environmentally responsible business practices that must be upheld.

GoTo seeks and maintains Vendors that operate in compliance with all applicable laws and regulations in any jurisdiction it operates in. In instances where the standards outlined in the Code differ from local laws, Vendors must respect these standards within the framework of the applicable local laws. Vendors must be open and cooperative with regulators and comply with jurisdictional requirements.

The Code will be subject to periodic review by GoTo, with any updates published on GoTo's website.

In the event of any conflict or ambiguity between the provisions of this Code and any relevant contract with a Vendor, the provisions of that contract will prevail.

Who Must Follow the Code?

This Code applies to all vendors along with its affiliates, employees, contractors, supply chain and business partners (and other third parties acting on behalf of GoTo including but not limited to intermediaries/finders, subcontractors, agents and business partners). For the ease of reference, all parties mentioned beforehand will be referred to as vendors.

All new and existing vendors are expected to meet these minimum expectations and to aspire to make continuous improvements to their businesses as noted in this Code. Any facts or circumstances which are likely to lead to a vendor's inability to meet the requirements and expectations of this Code should be reported immediately to GoTo's procurement team.

GoTo requires vendors to acknowledge this Code, 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 Code represents and warrants that he or she is duly authorized to execute and deliver this Code on behalf of the relevant vendor company. Vendor represents and warrants

that the execution and delivery of this Code have been duly authorized and that the acknowledgement made hereunder are valid and binds the Vendor.

Violation of the Code

GoTo aims to collaborate with transparent, ethical, environmentally, and socially responsible Vendors. While we recognize that our Vendors are independent entities, their conduct can reflect on GoTo. Therefore, any breaches of all applicable laws; legal regulations, directives and guidelines; including but not limited to labor, anti money laundering & combating the financing of terrorism, anti bribery & corruption, and data privacy must be addressed promptly. Persistent non-compliance may lead to a review of contract terms, including order reduction and relationship termination.

If a vendor is found to be under any:

- 1) Investigation by law enforcers or regulators;
- 2) Inquiry from law enforcers or regulators;
- 3) Facing enforcement proceedings for any offenses under any applicable laws and regulations;
- 4) In violation of the requirements or standards of this Code; or
- 5) In violation or upon notification of a potential violation of the contract between GoTo and the Vendor, as addressed by GoTo,

the Vendors is expected to make its best effort to inform GoTo immediately or as soon as is practicable and remedy any such violation in a timely and sensitive manner. Based on these findings and in accordance with applicable laws and regulations, GoTo reserves the right to suspend any obligations to its vendors. Failure to disclose such information may result in a review of contract terms, potentially leading to order reductions or termination of the relationship.

Vendor Code of Conduct Aspects

1. Business Ethics and Compliance with Applicable Laws and Regulations

At GoTo, we are committed to hold ourselves to the highest ethical standards and compliance with all applicable laws; legal regulations, directives and guidelines; rules, and regulations. We expect our vendors to uphold these principles and develop policies to ensure their business conduct and workers adhere to these standards. Vendors must comply with all applicable laws; legal regulations, directives and guidelines; and regulations in the locations where they operate and ensure that GoTo conducts business only with reputable parties that are established, financed, and operate through legitimate means.

1.a. Anti Bribery & Anti Corruption and Financial Crime

At GoTo, we have zero tolerance for bribery and corruption, as outlined in [GoTo's Anti Bribery & Anti Corruption Policy](#). Vendors must comply with all relevant anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, the Indonesian Law Number 31 of 1999 concerning the Eradication of Criminal Acts of Corruption and its accompanying updates, and any applicable local laws. Always act in alignment with this Code, maintaining appropriate policies and procedures, and include anti-bribery clauses in contracts.

Vendors must never directly or indirectly offer, provide, authorize, solicit, or accept anything of value (which could be financial or non-financial) to gain business or an improper advantage, or to influence the improper performance of any activity. Facilitation payments to public officials for routine governmental actions is prohibited. Avoid any form of illegal or inappropriate payments (such as extortion, fraud or embezzlement), which applies to interactions with both private entities or individuals and Government Officials.

Bribes can take many forms, such as cash, kickbacks, gifts, meals, travel, entertainment, sponsorships, charitable contributions, political contributions, and offers of employment or internships. Even legitimate payments can become bribes if disguised improperly. Vendors shall not offer or accept any benefits in order to obtain any undue or improper advantage or with the intention to let the receiver act in breach of his or her professional duties.

GoTo expects its Vendors to never tolerate and to take measures against any form of money laundering, tax fraud, tax evasion or other illegal financial schemes that may be indicated by the use of tax havens and jurisdictions prone to financial crime.

1.b. Conflicts of Interests

Vendors must avoid conflicts of interest that could undermine their impartiality, ensuring all decisions and engagements with GoTo are free from personal or private interests, and must make their best effort to contact GoTo and/or GoTo's procurement team if any actual or perceived conflict arises.

1.c. Confidentiality, Data Privacy and Security

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.

Vendors must have a robust or adopt and maintain appropriate technical and organizational measures and processes to provide protections for personal data, proprietary and Confidential Information, including Personally Identifiable Information (PII)) that they access, receive or process on behalf of GoTo.

1.c.1 Confidential Information (Protection)

Vendors must protect GoTo and its users' and/or clients' Confidential Information. Vendors must design, maintain and monitor controls and processes to provide appropriate protections for these assets and information.

1.c.2 PII and Privacy

GoTo requires Vendors to protect PII in compliance with all applicable GoTo policies, privacy / data protection and information security laws and regulations. PII data provided by or on behalf of GoTo should only be used, accessed, and disclosed as permitted by a definitive agreement or similar document between Vendor and GoTo.

1.d. Media

GoTo does not tolerate disrespectful or unprofessional usage of any media platform (whether or not such usage relates to GoTo, its business, workers 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.

1.e. 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.

1.f. Export Controls and Trade Sanctions

Vendors shall comply with applicable laws and regulations regarding export control and export restrictions, as well as relevant economic sanctions.

1.g. Anti-Competition Laws

Vendors shall respect and comply with applicable competition laws and regulations, including an obligation not to exchange commercially sensitive and strategic information with competitors or to enter into anti-competitive agreements with any business partner.

2. Labor and Human Rights

GoTo is committed to implementing and adhering to a policy of support for internationally recognized labor and human rights standards. Examples of such rights are articulated in internationally recognized standards, including the United Nations Guiding Principles on Business and Human Rights (UNGPs), the Universal Declaration of Human Rights, and the International Labor Organization (ILO) Core Conventions. In this regard, Vendors must at a minimum, adhere to the standards enshrined in all applicable labor and human rights laws and regulations in any locations in which they operate, providing fair wages and benefits, adhering to legal limits on working hours, and ensuring workers receive all entitled employment rights. Vendors must not engage in or tolerate slavery, forced labor, human trafficking, or child labor, and must maintain a workplace free from discrimination, harassment, and abuse, treating all workers with respect and dignity. Vendors shall recognise and respect the rights of all of their employees to freely associate, organize and bargain collectively, if the rights holders so wish. Vendors are expected to have a process through which its workers can raise workplace concerns without fear of retaliation. This whistleblowing mechanism should be transparent and understandable to workers, and should ensure the protection of whistleblowers.

Furthermore, GoTo expects vendors to respect human rights not only for their workers but also for communities and all stakeholders in their ecosystem, and to comply with all relevant laws, regulations, and directives in the countries and communities where they operate.

3. Health and Safety

Vendors must provide a safe work environment by abiding by local laws and regulations, effectively managing health and safety to address risks, issues, incidents, and non-compliance, and ensuring adequate facilities for their workforce's health and well-being, which at the minimum may refer to [GoTo's Workplace Management Health & Safety Policy](#).

4. Environmental Responsibility

Sustainability is integrated into everything GoTo does as a company, from operations and growth to stakeholder engagement across our ecosystem, as outlined in GoTo's commitments at

<https://www.gotocompany.com/en/our-commitments>. GoTo holds itself accountable to the highest levels of Environmental, Social & Governance standards and best practice, expecting our vendors to do the same by minimizing their environmental impact and supporting sustainable technologies, while complying with all applicable laws and regulations.

- A. 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.
- B. 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.

- C. 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.
- D. If vendors keep any dangerous and/or hazardous materials, they must minimize use, store safely, and keep all hazardous material records that are necessary.
- E. 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.
- F. 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.

5. Compliance and Monitoring

Vendors must join in a commitment of compliance to transparency and disclosure and to provide full cooperation to GoTo if required, to review the vendor's policies, procedures or any other document related to adherence to this Code.

GoTo conducts risk based due diligence by regularly and systematically identifying and assessing human and labor rights, environment and business ethics related risks and impacts in its value chain, and uses this information to avoid, mitigate or remediate the impacts in order to ensure that it operates responsibly. GoTo reserves the right to review the Vendor's policies, procedures or any other document related to adherence to this Code at any time. In the event of suspected breaches of this Code, the vendor shall permit GoTo's authorized employee or independent representative to inspect the vendor's accounts and records relating to the services provided or to its Agreement, with at least 30 days prior written notice of its intention to conduct an audit or inspection of the Vendor's operations relevant for the Code, including but not limited to the Vendor's facilities. The audit or inspection will be conducted in a way that minimizes disruption to the vendor's business and focuses only on the relevant services or products provided for GoTo. If requested, vendors are required to provide details and data including any necessary support about their performance on the topics included in this Code to GoTo or to other entities. GoTo also expects its Vendors to conduct a reasonable level of risk assessment on its operations, including but not limited to those of any environmental, social and internal controls that may impact their operations, and implement appropriate mitigation and remediation measures in relation to the level of risk and impact. Any material risk or impact should be communicated to GoTo upon request.

Vendors should have adequate risk management systems and controls in place to ensure compliance with the Code or agreed equivalent standards. The functioning and quality of the Vendor's management system should be in proportion to the size, complexity and environment of the Vendor's business. Vendors should secure and monitor that their own vendors and subcontractors comply with the Code or, where applicable, their own equivalent code of conduct.

6. Speak Up Channels

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:

For General inquiries: vendormanagement@gojek.com

You can report anonymously if you choose to



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

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



Translation services are available

Locate the number for your location on <https://goto.ethicspoint.com>

The contents of this Code are additional to and do not in any way affect or prejudice any of GoTo' rights and remedies under the relevant contracts with each vendor, if any. In the event of any non-compliance to the requirements of this Code or breach of contract, GoTo reserves its rights and retains the sole discretion to exercise any rights under this Code, any relevant contract and/or local laws and regulations.

GoTo reserves the right to make unilateral changes to our Code or GoTo policies at any time.

Retaliation of any kind against an individual or entity who reports concerns in good faith violates this Code and will not be tolerated.