



Whistleblowing

Group Policy

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Policy Owner: Ethics & Compliance

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Glossary

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| <p>Company</p> | <p>Refers to all subsidiaries and affiliates of the GoTo Group and its subsidiaries. “Your Company” or “their Company” refers to the operating entity that the Company Personnel is employed with. “Relevant Company” refers to the relevant entity or entities applicable in the context that the term appears.</p> |
| <p>Company Personnel</p> | <p>Refers to all GoTo Group Board of Commissioners, Board of Directors, and all employees, whether permanent or non-permanent employment with GoTo Group, wherever he/she is located. While this Policy is written primarily for GoTo employees, members of Board of Commissioners and Board of Directors, reference to "Company Personnel" shall also, where applicable, refer to GoTo's extended workforce, including agents, consultants, contractors, representatives and other associated persons who are expected to follow the Policy.</p> |
| <p>GoTo Group</p> | <p>The established holding company, PT GoTo Gojek Tokopedia Tbk, consists of subsidiaries and its affiliates from business units from Gojek, Tokopedia, GoTo Financial and GoTo Logistics.</p> |
| <p>Misconduct Activity(ies)</p> | <p>Any kind of violation of the Company’s Code of Conduct, policies and prevailing laws and regulations including accounting, auditing, internal controls, or other violations which potentially harm the Company and its personnel, and lead to financial and non-financial losses, business, operational or reputational damage.</p> |

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| Third Party(ies) | <p>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.</p> |
| Whistleblowing | <p>Whistleblowing is an action of making a disclosure and/or blowing the whistle by a Company Personnel or Third Party to report certain events/information about potential or Misconduct Activities, illegality or other wrongdoing.</p> |

I. Introduction

The Company is committed to upholding the highest ethical standards and integrity in doing business. The Company expects Company Personnel to conduct themselves in a manner that is consistent with the Company's commitment. The Company encourages Company Personnel and Third Parties to come forward and report any wrongdoing, unethical or inappropriate conduct, and/or behavior within the Company.

The Company whistleblowing system is ensuring that all incoming concerns and/or reports are treated seriously, with full confidentiality, and will be resolved in line with the Company policy, relevant laws and regulations. All incoming reports will be analyzed based on their credibility, materiality, and verifiability before being determined whether the reports will require more supporting data and/or be

investigated by the investigation unit. The Company will not tolerate illegal or unethical conduct or any misconduct against its Code of Conduct. Moreover, the Company will ensure no retaliation for good faith reports and, as set out in this policy, encourage the Company Personnel and Third Parties to address any reports of suspected misconduct or violations.

This policy has been designed to protect the Company Personnel to report their concern assuredly in a safe environment and enable the Company to identify and address risks from but not limited to reputational, financial and legal risks.

All Company Personnel must read and understand this policy. If you have any questions concerning the requirements of this policy, please consult the Ethics & Compliance Function at compliance@gotocompany.com for guidance.

II. Purpose

1. Ensure the effectiveness and measurable application of GoTo Code of Conduct - The Code, Company Regulation, and other Company policies.
2. Set the principles of the whistleblowing system to raise concern/ report related to Misconduct Activities in the Company to enable and encourage Company Personnel and Third Party to come forward or raise their concerns regarding any (potential) Misconduct Activities in the Company.
3. This policy is intended to encourage and enable Company Personnel to raise serious concerns within the Company organization prior to seeking resolution outside the Company Organization.

III. Scope

This policy is aimed to enable Company Personnel and Third Party to report but not limited to following irregularities and/ potential Misconduct Activities related to:

- Unequal Opportunity Employment
- Discrimination and Harassment
- Drugs and Alcohol
- Workplace Safety
- Personal Investment
- Outside Work Employment
- Company Inventions
- Personal Relationship
- Confidential Information
- Social Media & External Communication
- Personal Data Protection & Privacy
- Intellectual Properties
- Company Properties
- Financial Integrity
- Anti Bribery & Anti Corruption
- Anti Money Laundering & Combating Terrorist Financing
- Related Party Transaction
- Conflicts of Interest
- Antitrust & Competition
- Insider Trading
- Trade Compliance & Sanctions

IV. Our Policy

1. Principles

a. Confidentiality

This policy will enable Company Personnel to make a whistleblowing report with full confidentiality and allow anonymity. All reports will be treated in a classified and sensitive manner. The Company will ensure that all reports will be treated in a confidential and sensitive manner.

Misconduct Activities or potential irregularities shall be reported under full confidentiality and will be treated likewise. In circumstances when the report is made anonymously, the identity of the whistleblower will not be revealed unless the whistleblower gives the consent to reveal the identity.

However, if the law required the whistleblower identity to be revealed during criminal proceedings, the Company shall ask for the consent from the whistleblower.

b. No Retaliation

The Company does not tolerate any form of retaliation, such as harassment, pressure, discrimination, intimidation, victimization, or any other form of retaliation, or adverse employment consequence, due to the reports made against the Company and/ or other Company Personnel. All whistleblowing reports will be processed and pursued as long as the report mentions clear allegations and supported by sufficient initial evidence.

A Company Personnel who is proven to retaliate against another Company Personnel who has reported Misconduct Activities will be subject to disciplinary sanction based on applicable Company policies.

c. Untruth Allegation (False allegation/ libel)

A whistleblower must act in good faith and have a justifiable basis or facts to support the information on Misconduct Activities reported to the Company.

d. Prudentiality and Accountability

All Company Personnel who are involved in managing the whistleblowing cases, included but not limited to analysis, investigation, reporting activities, in the Company must act with prudent principles which are:

- Every indication of potential irregularities and or Misconduct Activities must be handled with caution.
- Any information on indicative potential irregularities/proven Misconduct Activities must be handled strictly confidentiality on a need to know basis, unless if required by Law.

2. Mechanism

a. Reporting

If Company Personnel and/or Third Party believes that there are (potential) Misconduct Activities based on the Scope, they should report immediately and they could raise their concerns with confidentiality and anonymously to a dedicated whistleblowing channel (**Speak Up Portal**), either by website or phone:

- Website: <https://goto.ethicspoint.com>
- Phone: Locate the toll free number for your location on **goto.ethicspoint.com**

All concerns reported at least should include information about:

- type of the irregularities/type of cases,
- the background and chronological event of the concern,
- relevant place, dates and timings where possible,
- the reported individual/party,
- and preliminary evidence(s).

b. Investigation

An investigation will take place into the alleged matter or misconduct violations. All cases will be investigated in a full closure and independent manner by a trained investigation unit.

The investigation process of the incoming whistleblowing report conducted by the Company shall follow the applicable whistleblowing investigation standard.

c. Possible Outcomes

Possible outcomes will refer to the Disciplinary Sanctions Standard and/or as determined by the Company, which may include corrective measurement based on the relevant policies, and/or further investigation by an external authority.

d. Policy Against Retaliation and Certain Procedures

Apart from the Company obligation to ensure all the reports remain classified but Company also emphasize the prohibition for anyone to retaliate against any Employee or Board member who in good faith reports possible misconduct, illegal or unethical behavior and the Company will ensure it will take the appropriate steps to prevent retaliation including:



- a. Confidentiality of the whistleblower's identity, and protection from actions that will harm or even endanger the whistleblower.

- b. Security of all information about the misconduct activities/potential irregularities they report.
- c. The entitlement for the whistleblower to obtain information about the report follow-up, as well as the final results of the report.
- d. No tolerance for adverse treatments and retaliation such as:
 - Unfair dismissal
 - Harassment
 - Demotion of rank
 - Discrimination in all forms
 - Harmful records (in whistleblower personal data file or personal record file)
- e. Whistleblowers can report to the Company if under pressure or being retaliated. Reports can be submitted to the People and Culture Function (your People Business Partner or the Employee & Industrial Relations Team), the Ethics & Compliance Team or the Speak Up portal mentioned above.
- f. The Company will provide a measured legal protection for whistleblowers, if necessary and appropriate, in accordance with the prevailing laws and regulations.

V. Document History

| Version | Date | Prepared by | Reviewed & Acknowledged by | Summary of Revisions |
|---------|-----------------|---------------------|----------------------------|---|
| 1.0 | 30 June 2022 | Ethics & Compliance | Legal | Launch of Whistleblowing Policy |
| 2.0 | 16 October 2023 | Ethics & Compliance | Not applicable | Updated Speak Up portal details, as dedicated whistleblowing is outsourced to an independent third party vendor |

GoTo Whistleblowing Policy Approval:

| Issued by | Approved by |
|---|--|
|  |  |
| Kathlyn Koh | Thomas Husted |
| GoTo Ethics & Compliance Head | GoTo Chief Operating Officer |