



SUPPLIER CODE OF CONDUCT

Last Updated: 11/3/25

INTRODUCTION

At GoTo, we are fully committed to operating our business with integrity, fairness and high ethical standards and expect our suppliers to demonstrate a commitment to the same ethical principles. This supplier code of conduct (this "Code") sets forth GoTo's expectations of its suppliers and their commitment to regulatory compliance, business ethics, human rights, health, safety and environmental responsibility. As used herein, a "Supplier" is any entity or individual, including its employees, agents and affiliates, that sells, or seeks to sell, goods or services to GoTo.

In addition to this Code, Suppliers are required to adhere to the provisions of their agreements with GoTo, and this Code does not amend, nullify or impact in any way, the contractual obligations set forth in any agreements between GoTo and its Suppliers.

Suppliers must also be in compliance with all laws, rules, and regulations applicable wherever they conduct business as well as the requirements of this Code. Where local laws may be less restrictive than the Code, we expect our Suppliers to comply with the standards of ethics as further described in this Code.

While Suppliers are expected to self-monitor their compliance with applicable laws and this Code, GoTo reserves the right, subject to reasonable notice, to audit Suppliers or inspect their facilities to confirm compliance with the ethics, human rights, environmental health and safety principles set forth in this Code.

BUSINESS PRACTICES AND ETHICS

GoTo prides itself on operating its business in accordance with high standards of integrity and business ethics, and we expect our Suppliers to uphold the same in every aspect of their business practices.

- **Confidentiality:** We require that Suppliers use confidential information received from GoTo only as authorized by GoTo to provide services to GoTo. Likewise, we request Suppliers to abide by any lawful obligations that they have to other clients and not share their confidential information with GoTo.
- **Honest and ethical conduct and fair dealing:** We expect our Suppliers to deal honestly, ethically and fairly with all their business partners and competitors. Statements and other records involving their business must not be untrue, misleading, deceptive or fraudulent.

Additionally, Suppliers shall strictly prohibit all forms of corruption, extortion and embezzlement, and follow all applicable antitrust and competition laws. In particular, Suppliers should not:

- Fix or control prices;
 - Split potential markets or customers; or
 - Take any other actions that unreasonably limit competition
- **Gifts and gratuities:** GoTo is committed to observing the standards of conduct set forth in the U.S. Foreign Corrupt Practices Act ("FCPA") and the anti-corruption and anti-money laundering laws of the countries in which GoTo operates. Therefore, Suppliers must not use their funds or assets for gifts, gratuities, kickbacks or other favors to business partners, competitors or government officials, except to the extent such gifts are in compliance with applicable law, insignificant in amount and not given in consideration or expectation of any action by the recipient. In addition, Suppliers should prohibit their employees, officers, directors and their respective immediate family from accepting any gifts, gratuities or other favors from any customer or other person engaging in or seeking to engage in business with such Supplier. Unless of insignificant value, gifts and gratuities must be returned immediately or redirected for charitable disposition. We expect Suppliers to exercise common sense and moderation in engaging in business entertainment. Suppliers should provide, or accept, business entertainment only if it is infrequent, modest and intended to serve legitimate business goals. On the other hand, bribes, kickbacks and other forms of grease payments are strictly prohibited.

HUMAN RIGHTS AND LABOR STANDARDS

At GoTo, we believe that all workers in our global supply chain deserve to be treated with the utmost dignity and respect. We are committed to ensuring that our policies and programs incorporate internationally recognized human rights standards such as those set forth by the International Labour Organization ("ILO"), and equal opportunity in the workplace and we expect all our employees, directors, partners, and Suppliers to uphold these same human rights standards, regardless of their geographic location of business.

- **Wages and Benefits:** Suppliers must follow all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, including all legally required benefits to their employees.
- **Collective Bargaining and Freedom of Association:** GoTo expects its Suppliers to respect their workers' rights to engage in labor negotiations, including collective bargaining, as well as the rights of their employees to affiliate or refuse to affiliate with lawful organizations, such as trade unions or worker organizations.
- **Freedom from Harassment:** Suppliers should ensure a workplace free of verbal abuse or harassment, mental and physical coercion, psychological harassment, sexual harassment or any other form of threats, violence or inhumane treatment.

- **Nondiscrimination:** Suppliers must not tolerate any discrimination on the basis of race, creed, religion, color, ancestry, sex, age, marital status, national origin, veteran status, genetic information, disability, sexual orientation, gender identity, or any other classification protected by law. When selecting Suppliers, we consider as a factor whether Suppliers have a policy of promoting economic inclusion by providing equal opportunities.
- **Prohibition of Child Labor:** Suppliers must not use child labor in any stage of the business in rendering the contracted services. A "child" is defined as anyone under the age of 15, under the age of completing compulsory education, or under the minimum age of employment, whichever is greatest. Workplace learning programs for students under the age of 18 may be permitted if conducted in compliance with the local laws. However, Suppliers should protect each students' rights and underaged workers may not perform jobs that are either hazardous in nature or administered in a manner that is likely to jeopardize the workers' health and safety.
- **Prevention of Slavery and Human Trafficking:** GoTo prohibits all forms of human trafficking and modern slavery in any part of their business and therefore expects Suppliers to prohibit the use of forced or involuntary labor of any type (e.g. forced, bonded, indentured or involuntary prison labor) in their supply chain. Due to the nature of our business as a software company and our approach to governance, GoTo does not use an extensive range of local or international Suppliers that we assess to possess material risk of modern slavery or human trafficking in our business and supply chains. However, we are committed to implementing controls designed to ensure that slavery and human trafficking are not occurring anywhere in our supply chains. We have a zero-tolerance policy regarding human trafficking and slavery and upon discovering any Supplier's failure to meet these standards regarding slavery and trafficking, GoTo will move to discontinue business relations with such Supplier.

HEALTH AND SAFETY

Suppliers are expected to provide a healthy and safe working environment that at a minimum, complies with all applicable health and safety laws, regulations and practices. Adequate steps must be taken to identify, assess and mitigate any potential occupational hazards, including but not limited to hazards related to energy sources, fire, vehicles, chemicals and machinery employed in the workplace. When injury occurs despite the preventative measures, Suppliers should ensure their workers are able to promptly report the incident and receive necessary medical care.

In preparation for an emergency, Suppliers should periodically assess potential risks and have systems in place to respond to such emergency, such as evacuation procedures, employee notification, exit facilities, regular drills and detailed recovery plans.

Each Supplier's workplace should be equipped with sanitary toilet facilities. GoTo recognizes that an employee's right to water is a fundamental human right. Each Supplier's workers are to be provided with access to potable water and sanitary food preparation, storage, and dining facilities. If applicable, worker dormitories provided by the Supplier must be safe, habitable and compliant with local housing law and regulation.

ENVIRONMENTAL PROTECTION

GoTo believes that technology and corporations can make a meaningful impact on the environment and the overall health of our planet. We have established our own Social & Environmental Responsibility Principles and Program available on our Corporate Responsibility Site which publicly state our commitment to ensuring that we are providing a safe, inclusive and positive workplace for our employees while also conducting our operations in an environmentally responsible manner. In line with our environmental initiatives, we strive to work with Suppliers who share similar goals. At a minimum, Suppliers must comply with all applicable environmental laws, regulations and standards within their respective industries. GoTo also encourages its Suppliers to incorporate sustainability goals and measures designed to minimize the environmental impact of their products and services.

REPORTING OF QUESTIONABLE BEHAVIOR

If you wish to report unethical or questionable behavior or a potential violation of this Code, you may contact GoTo's Global Procurement Department at Procurement@GoTo.com with a copy to your local GoTo contact.

GoTo is committed to continuously reviewing and updating its policies and procedures. GoTo therefore reserves the right to amend, modify or terminate this Code at any time and for any reason, subject to applicable law.