Third Party Code of Conduct

Careem



This Third Party Code of Conduct ("Code") sets the minimum expectations for the conduct of individuals and entities that engage in business with Careem, act on behalf of Careem, and provide services or goods to Careem, including their employees, personnel, agents representatives, consultants and subcontractors (collectively referred to as "Third Parties" or "you"). At Careem we are committed to conducting business fairly while we pursue our purpose to simplify and improve the lives of people and build an awesome organisation that inspires. As a condition of doing business with us and partnering in our purpose, you must comply with this Code.

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While conducting business with us, you must act honestly, fairly, with integrity and observe the highest standards of ethical conduct. We do not tolerate any form of corruption, bribery, fraud, terrorism financing, money laundering or advantage of any kind obtained by acting fraudulently, deceptively, or making false claims (or allowing anyone else to do so).

## Applicable Laws& Regulations

You must conduct your business in compliance with applicable laws and regulations, including without limitation, on the topics of anti-corruption, anti-bribery, anti-fraud, anti-money laundering, lobbying, data privacy, data processing, data protection, information security, antitrust, trade compliance and competition.

#### G Gifts and other payments by Third Parties

You must never offer, promise or give anything of value (e.g. money, gifts, meals, entertainment, donations, job opportunities, goods or properties, etc) directly or indirectly to a government official or any other person knowing that all or a portion of the it will be offered, given or promised for a corrupt purpose, to obtain an improper or unfair advantage, or in a manner that could damage Careem's reputation.

Gifts, hospitality, entertainment or travel must be reasonable, modest, transparent, for business purposes, in accordance with applicable laws and regulations and with both parties' (giver and recipient) internal policies, and may not compromise the recipient's ability to make an objective and fair decision regarding a particular situation. Any form of payment to a government employee to expedite or secure the performance of a routine governmental action (e.g. process visas, customs declarations, etc) is strictly prohibited, except if it is an official express service offered by them.

#### Payment by Careem

Careem will only make payment to you upon receipt of an official invoice referencing the particular contract you have with Careem for the goods and/or services provided under that contract.

Careem will make the payment to a bank account in your name (contracted legal entity) in the country where the services are to be provided or where the contracted legal entity has established or maintains its principal place of business.

#### **Fair Competition**

You must compete fairly, in accordance with applicable laws and regulations. You must not use any illegal or unethical means to get information about other companies. You must not coordinate market conduct with other companies in a way that improperly restricts competition.

#### Financial Integrity, Records, and Accounting

You must never offer, promise or give anything of value (e.g. money, gifts, meals, entertainment, donations, job opportunities, goods or properties, etc) directly or indirectly to a government official or any other person knowing that all or a portion of the it will be offered, given or promised for a corrupt purpose, to obtain an improper or unfair advantage, or in a manner that could damage Careem's reputation. Gifts, hospitality, entertainment or travel must be reasonable, modest, transparent, for business purposes, in accordance with applicable laws and regulations and with both parties' (giver and recipient) internal policies, and may not

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#### Insider Trading

As a Careem Third Party, you may have access to material, non-public information about Careem, Careem's shareholders or Careem subsidiaries. Information is material if a reasonable investor would consider it important in deciding whether to buy, sell or hold a company's securities. You may not buy or sell securities while in possession of Careem, Careem's shareholders or Careem subsidiaries material, non-public information or provide that information to others who trade on it.

#### Conflicts of Interest

You must avoid any activities that create a conflict of interest or even the appearance of a conflict of interest due to their relationship to Careem. If such situations arise, you must promptly disclose them to Careem in writing.

#### Healthy, Safe & Respectful Treatment

You must treat all people with respect and dignity, seeking to create and promote a work environment that is safe, healthy and inclusive of all people and their unique abilities, strengths and differences. You must not discriminate, harass, intimidate, threaten, humiliate or abuse people.

You must comply with applicable laws and regulations relating to employment practices. In relation to your business relationship with Careem you are expected to permit workers to openly communicate and share grievances with management about working conditions without fear of retaliation You are also prohibited from participating in human trafficking, or using any form of involuntary, child, slave or forced labour.

### ⇔ Privacy, Security & Confidentiality

At Careem, we handle data and information with the utmost care. As a Careem Third Party, you may have access to various categories of data shared with you by Careem due to your business relationship with Careem (e.g. personal data, our information, electronic data, intellectual property, know-how, technologies etc). All this data must be collected, received, stored, handled, processed and protected appropriately in accordance with applicable laws and regulations and your agreement with Careem.

You may not discuss, disclose, transfer, release, or share any confidential information or personal data concerning Careem without prior written consent from us. Moreover, you must seek to prevent the occurrence of incidents and breaches of privacy.

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You should strive to contribute to the promotion of a positive and sustainable legacy in the communities we are blessed to serve, maintaining a transparent dialogue, respecting and considering their social, cultural, environmental and economic aspects. You must comply with environmental laws and regulations. You are expected to conduct your business in a manner to minimize your adverse impact on the environment and the use of natural resources.

#### Reporting Issues of Concerns

Careem takes the commitments in this Code very seriously and reserves the right to assess and monitor your compliance with it. Violations of this Code will result in a review of our business relationship, up to and including termination of the relationship (as per your agreement with Careem).

We expect you to promptly report to us at

compliance@careem.com any violations or suspected violations of this Code, including information about the potential misconduct of a Careem employee.