



Third Party Code of Conduct

careem

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At Careem, we are committed to upholding the highest standards of ethical conduct, integrity, and compliance. This Third Party Code of Conduct (TPCoC) outlines the minimum standards and expectations that apply to all third-parties engaging with Careem including suppliers, vendors, contractors, partners and consultants, (collectively, “Third Parties”) providing goods or services to any part of the Careem business, regardless of jurisdiction.

By engaging in any business relationship with Careem, each Third Party confirms and certifies that it complies with the principles and requirements set forth in this TPCoC. These standards reflect Careem’s core values and our commitment to operating in an ethical, lawful, and socially responsible manner.

Careem reserves the right to assess compliance through audits, inspections, or evaluations, either directly or through appointed third parties. Any non-compliance with this TPCoC may result in corrective action, including potential termination of our business relationship.

This TPCoC is a reflection of our shared responsibility to promote compliance, fair labour practices, respect for human rights, and sound governance.



Applicable laws & regulations

Third Parties are required to conduct their business in compliance with all applicable laws and regulations, including but not limited to those governing anti-corruption, anti-bribery, fraud prevention, anti-money laundering, lobbying, data privacy, data protection, information security, antitrust, trade compliance, and fair competition.



Business ethics & integrity

When conducting business with Careem, all Third Parties must uphold the highest standards of honesty, fairness, integrity, and ethical conduct. Careem has zero tolerance for any form of corruption, bribery, fraud, terrorism financing, money laundering, or unethical advantage gained through deception, false claims, or fraudulent actions, whether directly or indirectly.

Gifts and other payments by Third Parties



Third parties must never offer, promise, or provide anything of value such as money, gifts, meals, entertainment, donations, job opportunities, goods, or property directly or indirectly to a Public Official, another Third Party or individual with the intent to secure an improper advantage, influence a decision, or for any corrupt purpose. Any action that could damage Careem's reputation is strictly prohibited. Facilitation Payments are strictly prohibited. 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.



Payments by Careem

Careem will process payments to Third Parties only upon receipt of an official invoice that references the specific agreement/ Purchase Order governing the goods and/or services provided. Payments will be made exclusively to a bank account registered under the contracted legal entity's name, either in the jurisdiction where the services are provided or where the legal entity is established or maintains its principal place of business.



Financial integrity, records, and accounting

Careem relies on accurate and transparent financial records to report financial results, fulfill legal obligations, and make informed business decisions. Third Parties must maintain complete, accurate, and up-to-date financial books and business records related to their activities with Careem, including receipts, invoices, and contracts, in accordance with applicable standard accounting practices and regulatory requirements.



Fair Competition

Third Parties must compete fairly and in full compliance with applicable laws and regulations. The use of illegal or unethical methods to obtain information about other companies is strictly prohibited. Third Parties must not coordinate market conduct with other companies in a way that improperly restricts competition.



Conflicts of interest (COI)

Third Parties must avoid any activities that create, or may appear to create, a COI due to their relationship with Careem. If such a situation arises, it must be promptly disclosed to Careem in writing.



Information Security

To protect Careem's data, systems, and digital assets, Third Parties must uphold strong information security practices. These include:

- **Compliance with Standards:** Implement security controls aligned with applicable laws and industry frameworks (e.g., ISO/IEC 27001 or NIST).
- **Access Controls:** Enforce least privilege, use Multi-Factor Authentication (MFA), and promptly remove unnecessary access.
- **Data Protection:** Encrypt Careem data at rest and in transit, and prevent unauthorised use or disclosure.
- **Incident Reporting:** Notify Careem of any actual or suspected data breaches or security incidents within 24 hours.
- **System Security:** Keep systems updated, patched, and securely configured.
- **Third-Party Oversight:** Ensure subcontractors meet the same security requirements.
- **End-of-Contract Obligations:** Securely delete or return all Careem data and assets upon contract termination.



Respectful Treatment

Third Parties must treat all individuals with respect and dignity, fostering a safe, healthy, and inclusive work environment that values diversity and individual strengths. Discrimination, harassment, intimidation, threats, humiliation, or any form of abuse are strictly prohibited. Third Parties are strictly prohibited from engaging in human trafficking or using involuntary, child, slave, or forced labor in any form. Moreover, Third Parties must comply with all applicable employment laws and regulations. In their business relationship with Careem, they are expected to allow workers to openly communicate and raise concerns about working conditions without fear of retaliation. Careem will not conduct business with Third Parties that engage in or tolerate human rights abuses and/or violations of international law.

Data Privacy



At Careem, data and information are handled with the utmost care. As part of your engagement with Careem, you may have access to various categories of data shared with you by Careem (e.g., personal data, our information, electronic data, intellectual property, know-how, technologies, etc.). All this data must be appropriately collected, received, stored, handled, processed, and protected in accordance with applicable laws and regulations as well as the Third Party agreement with Careem. Third Parties may not discuss, disclose, transfer, release, or share any confidential information or personal data concerning Careem without prior written consent from Careem. Furthermore, you must seek to prevent incidents and privacy breaches.

Responsibility to our communities and environment



Third Parties should actively contribute to building a positive and sustainable legacy in the communities we are blessed to serve, fostering transparent dialogue while respecting their social, cultural, environmental, and economic aspects. Third Parties must comply with applicable environmental laws and regulations and are expected to operate in a way that minimises environmental impact and promotes the sustainable and responsible use of natural resources.

Violations



Careem takes the commitments enshrined in the TPCoC very seriously and reserves the right to assess and monitor your compliance with it. Violations of this TPCoC will result in a review of our mutual business relationship, up to and including termination of the relationship (as per your agreement with Careem). Careem expects you to promptly report to us at compliance@careem.com any violations or suspected violations of the TPCoC.