

**GRAB HOLDINGS LIMITED**  
**CODE OF BUSINESS CONDUCT AND ETHICS**

**Effective as of 3 March 2026**

**1. PURPOSE OF THE CODE AND ITS USE**

1.1 Corporate ethics is the practice of our shared values. These shared values define who we are and what we can expect from each other. Grab Holdings Limited and its subsidiaries and affiliates (“**Grab**” or the “**Company**” hereinafter) have adopted this Code of Business Conduct and Ethics (“**Code**” hereinafter), which sets out the fundamental standards of ethics and conduct to which the personnel of Grab are held. This Code applies to all Grab personnel, including but not limited to, directors, officers, employees, consultants, partners, suppliers, and extended workforce.

1.2 Grab requires honest and ethical conduct from everyone subject to this Code. Each of you have a responsibility to all the directors, officers and employees of Grab, and to our Company itself, to act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing your independent judgment to be subordinated and otherwise to conduct yourself in a manner that meets with legal and our ethical standards. You are a steward of this Code and are required to report any violations in accordance herewith. See Section 6 – “Reporting and Resolution Process”.

1.3 In addition to emphasizing Grab’s shared values, this Code is designed to define individual and corporate responsibility. Every employee must understand that he or she is responsible for his or her own conduct. No one has the authority to make other Grab personnel violate this Code, and any attempt to direct or otherwise influence someone else to commit a violation is a violation in itself. Alleged violations will be investigated and those who violate the standards set out in this Code will be subject to appropriate disciplinary action.

1.4 People in management positions, in particular, set an example for other employees and are often responsible for directing the actions of their subordinates. Grab requires all employees, particularly managers, to know and understand this Code.

1.5 Upon joining Grab, employees are required to certify that they have received and read this Code. This certification confirms that the person will comply with this Code.

1.6 It must be noted that this Code has been prepared to outline the broad principles of legal and ethical business conduct embraced by Grab. It is not a complete list of legal or ethical questions and/or situations you might face in the course of business, and, therefore, this Code must be used together with your common sense and good judgment. If you are in doubt or have a specific business conduct question, you should contact your management, or the Company’s Head of Group Compliance (“**Head of Group Compliance**” hereinafter), or the Company’s General Counsel (“**General Counsel**” hereinafter). If your concern relates to matters involving the integrity of our financial

reports, you can also contact the Head of Group Compliance, or the Company's Chief Financial Officer ("**CFO**" hereinafter).

## **2. COMPLIANCE WITH LAWS, RULES AND REGULATIONS**

### **2.1 In General**

2.1.1. Laws and regulations are ever-present in our industry, affecting virtually every functional area of Grab business/service. Regardless of what job you do or what country you work in, there are legal, regulatory and ethical standards that must be considered and upheld.

2.1.2 Grab strives to be a model corporate citizen in every community in which it conducts business and works to comply with all applicable laws and regulations. All individuals, officers, directors and employees must strive to be aware of and understand the foreign, national, state and local laws as well as the business/service requirements and practices that affect their business unit and area of responsibility.

2.1.3. Disregard of the law cannot and will not be tolerated. Violation of laws and regulations may subject an individual, as well as Grab, to civil and/or criminal penalties. Employees should be aware that conduct and records are subject to internal and/or external audits. Therefore, it is in everyone's best interest to know and comply with Grab's legal and ethical obligations. Although you are not expected to know the details of all of the applicable laws, rules and regulations, we expect you to seek advice from the General Counsel or our legal team if you have any questions about what conduct may be required to comply with any laws, rules and regulations.

### **2.2 Anti-kickback, Bribery**

2.2.1. In countries where we operate, it is illegal to provide, offer or accept a kickback or bribe. A kickback or bribe may be defined as any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is provided directly or indirectly, and that has as one of its purposes, the improper obtaining or rewarding of favorable treatment in a business transaction/service. Grab's policy on kickbacks and bribes is clear - they are illegal and therefore not allowed. Standard sales incentives such as discounts for prompt payment are not considered kickbacks. In general, if there is a request for a payment to a specific individual/party who is not Grab personnel, then that should raise a red flag as a likely improper payment.

2.2.2. Many countries have specific laws on conducting business with both domestic and foreign government officials. Under the U.S. Foreign Corrupt Practices Act and other related laws and regulations and Singapore laws and regulations, for example, a

company (including but not limited to its shareholders, directors, agents, officers and employees) is prohibited from directly or indirectly offering, promising to pay, or authorizing the payment of money or anything of value to a government official to win or retain business or favorable treatment.

Note that taking any of the above actions with respect to individuals who have close relationships with government officials is also forbidden. Note also that for purposes of the laws and regulations, officials who work for organizations that are owned by the government are considered to be "government officials", and taking any of the above actions with respect to those individuals is also forbidden.

The above prohibition on payments does not apply to any fees charged by government or non-government bodies as required by law and regulations, or for provision of a required service (if the expense is reasonable and with good purpose, directly relating to the promotion/exhibition of the services/goods, or explanation of services/goods, or signing or implementation of contracts).

There are some other limited exceptions as well. Because the laws and interpretations are complex, it is very important that you consult the General Counsel or the legal team before authorizing or making any such payments. Grab's policies and procedures relating to anti-corruption are described in more detail in the Company's Anti-Bribery and Corruption Policy, available [here](#), and which you must be familiar with and comply with.

## **2.3 Disclosure**

2.3.1. It is Grab's policy to provide full, fair, accurate, timely and understandable disclosure in all reports and documents that it files with, or submits to, the Securities and Exchange Commission ("SEC" hereinafter) and in all other public communications made by the Company, including all financial statements and other financial information. In this regard, the CEO, the Company's CFO and other senior officers are responsible for full, fair, accurate, timely and understandable disclosure in the periodic reports and other documents required to be filed or furnished by the Company with the SEC, as well as in other public communications made by the Company.

Accordingly, the CEO and the CFO should promptly bring to the attention of the Company's Audit Committee any material information of which he or she may become aware that affects the disclosures made by the Company in its public filings or otherwise assist the Audit Committee in fulfilling its responsibilities. There are procedures for reporting concerns relating to the integrity of our financial statements (e.g., accounting, internal accounting controls, and auditing matters), which are described in more detail in the Company's Disclosure Controls and Procedures Policy. Given the foregoing requirements, it is the obligation of every employee to ensure that they submit and maintain accurate records, so that materials reviewed by the CEO and CFO are based on accurate information.

## **2.4. Insider Trading**

2.4.1. In the course of business or services, Grab's directors, officers, employees, consultants and other persons may become aware of certain information that an investor could consider important in deciding whether to buy, sell or hold the Company's securities. Such "material information" includes but is not limited to potential acquisitions, earnings, major contract awards, stock splits, major management changes, upcoming litigation or regulatory proceedings, joint ventures, and imminent new services, etc.

2.4.2. Prior to a public announcement, all the directors, officers, employees, consultants and other affected persons must exercise the utmost care in handling such material inside information to avoid legal and ethical violations. Securities laws prohibit directors, officers, employees, consultants and other persons from trading securities when in possession of non-public (inside) material information.

2.4.3. Grab's directors, officers, employees, consultants and other affected persons are also prohibited from disclosing material non-public information to someone outside the company. Such "tips" may result in trading on the basis of inside information, which is also prohibited by securities laws.

2.4.4. Violations of securities laws are subject to severe civil and criminal punishments for both the individual and the Company. Severe penalties may even apply where the disclosing person did not engage in the transaction or personally benefit from the trading. Note also that the prohibition on insider trading applies not only to the Company's securities, but also to securities of other companies if you learn of material non-public information about these companies in the course of your duties to Grab.

2.4.5. Grab's directors, officers, employees, consultants and other affected persons who may have knowledge of the Company's financial results before they are released to the public are also prohibited from trading in the Company's securities during a "blackout period" at the end of each applicable period.

2.4.6. The insider trading and blackout restrictions described above are described in more detail in Grab's Statement of Policy Governing Material Non- Public Information and the Preventions of Insider Trading.

## **3. INTEGRITY**

### **3.1. Business Courtesies and Gifts**

3.1.1. Grab's policies and procedures with respect to gifts and gratuities are described in the Company's Gifts, Entertainment, Meals & Drinks Policy (the "**GEM Policy**"), available [here](#), and which you must be familiar and comply with.

3.1.2. Payments and reimbursements for such activities should be made only in accordance with applicable laws and regulations, the GEM Policy and the internal financial controls of Grab. It is very important to consult Group Compliance if you have any concerns or questions.

## **3.2. Confidentiality**

3.2.1. Directors, officers, employees and the extended workforce of Grab are obligated to maintain the confidentiality of information entrusted to them by the Company, as well as by its users, suppliers, shareholders, fellow employees, and other parties who disclosed information to Grab in confidence, except when disclosure is expressly authorized or is required or permitted by law. While some information may not be regulated by legal obligations, it is Grab's policy that all information developed or shared as a result of the business process is proprietary to Grab and must be treated as confidential. Such confidential information includes but is not limited to the technical information, operational information and other business information that might be of use to the Company's competitors or harmful to the Company or its users, suppliers or partners if disclosed. Examples of such information are set forth in further detail below.

- Technical information: Includes but is not limited to technical solutions, programming, technical specifications, software programs of Grab, and their source code, databases, experimental results, drawings, samples, models, operating manuals, documentations, computer/system accounts and passwords.
- Operational information: Includes but is not limited to operation strategies, financial data, policies and rules, Standard Of Practices ("**SOP**" hereinafter), research and development information, contract content, potential contracts or ventures, user data and user files (including but not limited to the list of users; the list includes but is not limited to users' name, address, contact details, transaction habits, the intention and content of the transaction, and the special information; the list includes but is not limited to the users' list which indicates numerous users and specific users who have maintained a long-term and stable transaction relationship with Grab; the above-mentioned information differs from the public information), marketing and sales plans/programs, pricing policies, financial information, management methods, bidding documents, procurement information, business correspondence, salary/welfare/benefits information and employment records.
- Other information: Includes but is not limited to the information and matters that Grab shall keep properly in accordance with laws, regulations, Grab policies/rules/SOP, agreements between Grab and external parties, such as internal correspondence, regulatory reports, materials that contain confidential

information (for instance, memos, notebooks, computer disks, movable hard disks, and so on).

3.2.2. Employees should store and keep the confidential information securely and share it only with those persons with a work need and that are authorized to know, in accordance with Company policy and applicable laws and regulations. Employees should consult their supervisor, or the Head of Group Compliance, or the General Counsel if they have any concerns. Employees should be especially careful not to inadvertently disclose confidential information through the ever-growing electronic media, such as e-mail, visible computer screen, text message, telephone voice mail, social media or the Internet. It is also prudent to refrain from discussing sensitive Company information in public places such as reception areas, corridors, elevators, airports, restaurants, etc.

3.2.3. Among other things, you are prohibited from: Purposefully seeking out confidential information which is irrelevant to your job; providing to or assisting in the dissemination of confidential information to any third parties directly or indirectly who should not be aware of it; transcribing, copying, emailing, removing the business information of Grab out of Grab.

3.2.4. Upon termination of your employment with Grab, you shall return all property of Grab, and any materials that contain the confidential information of Grab to Grab. All the files, documents, memos, correspondences, notes, lists, reports, prints, diskettes, faxes, electronic documents and other documents (including but not limited to the copies of the above-mentioned materials) that were prepared, approved, signed, received or transmitted during your employment with Grab, equipment and property of Grab (including but not limited to computers, printers, facsimile machines, corporate credit cards, mobile phones and telephone cards) shall be returned. All transcripts, copies, photocopies, ectype of carrier, relevant information and documents above shall be returned to Grab. The confidentiality obligations hereunder shall continue after the termination of the employee's employment with Grab.

### **3.3. Corporate Records**

3.3.1. Company documents and records (in any form or media) are part of the Company's assets, and employees are charged with maintaining their accuracy, completeness and security. Employees are required to use excellent record-management skills by recording information accurately and honestly, and retaining records as long as necessary to meet business objectives and government regulations. As required and directed, all employees are obliged to diligently search their files for any requested records.

3.3.2. Financial records must accurately reflect all financial transactions of Grab. In addition, each director, officer and employee who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records and accounts are accurately

maintained and that no false, artificial or misleading entries shall be made in the books and records of the Company for any reason. Each director, officer and employee must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and counsel. Company data must be maintained according to regulation and corporate confidentiality standards.

### **3.4 Conflicts of Interest**

3.4.1. A conflict of interest exists when an individual's personal interest or activity (or a member of his or her direct family) influences or interferes, or appears to influence or interfere, with the interests of the Company. Conflicts of interest are governed by Grab's Conflict of Interest Policy, available [here](#), and which you must be familiar and comply with.

### **3.5 Unauthorized Use of Corporate Assets**

3.5.1. All directors, officers and employees are obligated to protect the assets of Grab and ensure their efficient use. Theft, carelessness and waste have a direct impact on the Company's profitability and are prohibited. All Company assets should be used only for legitimate business purposes and corporate property, including but not limited to office supplies, equipment, services/products, and buildings, may not be used for personal reasons. Any misuse or misappropriation of corporate funds, information, equipment, facilities or other assets may be considered criminal behavior and can bring severe consequences. Expenses may not be charged to the corporation unless they are for Grab business purposes. Also, corporate computers may not be used as vehicles for unauthorized software (including but not limited to pirated, or unlicensed, or other software that Grab does not authorize to install), as may be a direct violation of copyright law. Furthermore, the obligation to protect Company assets includes the Company's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks, and copyrights, as well as business and marketing plans, designs, databases, records and any nonpublic financial data or reports. Unauthorized use or distribution of this information is prohibited and could also be illegal and result in civil or criminal penalties.

### **3.6. Corporate Opportunities**

3.6.1 You are prohibited from taking for yourself personally (or for the benefit of friends or family members) opportunities that are discovered through the use of Company assets, property, information or position, unless the CEO has declined to pursue the opportunity. You may not use corporate property, information, or position for personal gain (including gain of friends and family members), or to compete with Grab. You owe a duty to Grab to

advance its legitimate interests whenever the opportunity to do so arises. See also Grab's Conflict of Interest Policy, available [here](#).

### **3.7. Fair Dealing**

3.7.1. You should endeavor to deal fairly with Grab' users, suppliers, competitors and employees and with other persons/organizations with whom Grab does business. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.

### **3.8. Accountability for Job**

3.8.1. Each employee is responsible for knowing and executing the responsibilities of his or her job. This means that the individual is held accountable for the quality of the work he or she produces and for the accuracy of the applicable documentation. For example, this policy of personal accountability prohibits an employee from signing off on a process without properly performing it, or from representing the work of another employee as his or her own. Being knowledgeable about and complying with Grab's policies, including this Code, is among each employee's responsibilities of his or her job.

### **3.9. Non-Disparagement**

3.9.1. Grab personnel have an obligation to support the Company. It is therefore not appropriate for Grab personnel to make significant voluntary or gratuitous negative comments about Grab, or in any way to disparage Grab's reputation, to anyone outside Grab. Grab personnel may never leak information to the media or make negative comments on electronic message boards, in chat rooms or in emails or other forms of social media. If Grab is damaged, it may have the legal right to obtain from an internet service provider the name of the person who disclosed inappropriate information. Grab personnel may provide constructive criticism within Grab for valid business purposes and to improve Grab, and Grab personnel are generally encouraged to provide honest opinions, even if negative, to outside parties when required by law to do so, as in the case of litigation or a governmental investigation. You must always answer an inquiry from a government or judicial body truthfully and in good faith.

## **4. RESPECT FOR PEOPLE**

### **4.1. Respect for Human Rights**

4.1.1. Grab is committed to upholding and respecting internationally recognised human rights as outlined in the [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#) and the [International Labour Organisation \(ILO\) Declaration on Fundamental Principles and Rights at Work](#). We believe that all individuals deserve to be treated with dignity and respect.

4.1.2. In line with these international principles, we have a zero-tolerance policy for child labour, forced labour, and human trafficking in our operations and supply chains. We also respect the rights of our employees to come together, choose their representatives, and raise workplace matters collectively, where these are permitted under local law.

## **4.2. Health and Safety**

4.2.1. Grab seeks to provide each employee with a clean, safe, and healthy place to work. To achieve that goal, all employees must understand the shared responsibilities of abiding by all safety rules and practices, taking the necessary precautions to protect himself/herself and coworkers, and reporting immediately any unsafe conditions, practices or accidents.

4.2.2. Grab is committed to fostering a safe and healthy work environment. As such, Grab strictly prohibits being under the influence of alcohol or drugs during work hours, while on Grab premises, or when representing Grab in any capacity. Employees are reminded to consume alcohol responsibly outside of work and to refrain from the use of illegal drugs at all times. The misuse of prescription drugs that impairs judgment or work performance is also strictly prohibited. Any behavior resulting from alcohol or drug consumption that violates Grab's policies may lead to disciplinary actions deemed appropriate by Grab.

## **4.3. Conduct in the Workplace/Harassment**

4.3.1 Ethical personal conduct on the job means treating oneself and others with dignity and respect. Workplace harassment is any unwanted conduct that has the purpose or effect of violating a person's dignity and/or creating an intimidating, hostile, degrading, humiliating, unsafe or offensive environment. Grab is committed to providing working environments that foster respectful, safe and inclusive working relationships that are free from harassment and bullying. The foregoing matters are governed by the Grab Safe & Respectful Workplace Policy, available [here](#), and which you must be familiar and comply with.

## **4.4. Employee Privacy**

4.4.1. Every employee has the right to confidentiality of certain employment records as well as the privacy of personal activities outside of business hours. In turn, Grab has the right to access all Company property and all communication, records and information

created in the business setting. Using Company property and/or creating such records and information by employees will be deemed to be their consent to such access. To facilitate awareness, Grab has a Data Privacy Policy for its Employees, available [here](#), and which you must be familiar and comply with.

## **5. DEDICATION TO QUALITY**

### **5.1. Quality Policy**

5.1.1. Achieving the highest level of quality requires Grab employees to focus on continuous improvement of work activities. This includes enhancing value to users through new and improved products and services; reducing errors, defects and waste; improving responsiveness to the user; and improving productivity and effectiveness in the use of all resources. To this end, all employees are expected to know, understand, and comply with their business unit's applicable quality policies and procedures. Employees are also obligated to raise questions or concerns regarding quality issues to appropriate persons in management, as outlined in their business unit's quality manual/requirement.

### **5.2 Interpretations and Waivers of the Code**

5.2.1. If you are uncertain whether a particular activity or relationship is improper under this Code or requires a waiver of this Code, you should disclose it to the Head of Group Compliance, or the General Counsel, or the Board of Directors if you are a director, who will make a determination first, whether a waiver of this Code is required and second, if required, whether a waiver will be granted. You may be required to agree to conditions before a waiver or a continuing waiver is granted. However, any waiver of this Code for an executive officer or director may be made only by the Board of Directors and will be promptly disclosed to the extent required by applicable law, rule or regulation (including as required by SEC and Nasdaq rules).

## **6. REPORTING AND RESOLUTION PROCESS**

### **6.1. Reporting a Potential Violation**

6.1.1. Each director, officer and employee is responsible for conducting him or herself according to legal and ethical standards. Employees, directors and officers are required to talk to supervisors, managers or other appropriate personnel, as applicable, when in doubt about the best course of action in a particular situation. In addition, everyone has a responsibility to report in a timely fashion any violations of this Code. Grab encourages the transparent report on allegations of a violation of applicable laws, rules, regulations or this Code.

6.1.2. All reports of violations of this Code will be promptly dealt with and, if found to be accurate, acted upon in a timely manner. If any report of wrongdoing relates to accounting or financial reporting matters, or relates to persons involved in the development or implementation of Grab's system of internal controls, a copy of the report will be promptly provided to the Head of Group Compliance, who may participate in the investigation and resolution of the matter. Questions or concerns about any ethical or legal issue may be raised without concern for disciplinary action as long as they are made in good faith. No one will be subject to reprisals for, in good faith, reporting or supplying information about potential violations. In cases where the reporting employees, directors or officers are responsible for the violation, their information will be dealt with in accordance with related laws, regulations and Company policies; their proactive reporting behaviors may be integrated into the consideration of the final decision. Grab expects employees, directors and officers to fully cooperate in any investigation of a potential violation. If possible, all such reports will be held in confidence.

6.1.3. If an employee needs guidance on a legal or ethical question or has witnessed or has knowledge of an illegal or unethical activity, he or she should seek the counsel of his or her supervisor. If approaching the supervisor is uncomfortable, or if the response is unsatisfactory, reporting avenues and procedures are described in more detail in the Company's Whistleblowing Policy, available [here](#), and which you must be familiar and comply with.

6.1.4. Each officer shall promptly bring to the attention of the Head of Group Internal Audit or the General Counsel any information he or she may have concerning any violation of this Code, including but not limited to any actual or apparent conflicts of interest between personal and professional relationships, involving any management or other employees who have a significant role in the financial reporting, disclosures or internal controls of Grab.

6.1.5. Each officer shall promptly bring to the attention of the General Counsel any information he or she may have concerning evidence of (including but not limited to) a violation of the laws, rules or regulations applicable to Grab and the operation of its business, by Grab or any agent thereof, or of violation of this Code.

## **6.2. Investigations and Corrective Action**

6.2.1. Reports of alleged violations will be investigated by the Company, and will be treated confidentially to the extent consistent with corporate interests and legal obligations. If the results of an investigation indicate that corrective action is required, the Company will decide the appropriate steps to take, including discipline, dismissal and possible legal proceedings. If appropriate, the investigation may be turned over to applicable outside authorities, and external investigators may assist with the inquiry. As part of the closure process, results of an investigation may be shared with the initiator of the report.

6.2.2. The Regional or Global Remediation Council shall determine, or designate appropriate persons to determine, appropriate actions to be taken in the event of violations of this Code. The designated appropriate persons in the Regional Remediation Council shall, in all instances, include the Head of Country People Operations for the country in which the individual involved is employed. Such actions will be reasonably designed to deter wrongdoing and to promote accountability for adherence to this Code and may include, but are not limited to, written notices to the individual involved that the Company has determined that there has been a violation, censure, demotion or re-assignment of the individual involved, suspension with or without pay or benefits, and termination of the individual's employment or such other action as the Company may determine is appropriate under the circumstances. In determining what action is appropriate in a particular case, the Company (or its designee) shall take into account all relevant information, including but not limited to the nature and severity of the violation, whether the violation was a single occurrence or repeated occurrences, whether the violation appears to have been intentional or inadvertent, whether the individual in question had been advised prior to the violation as to the proper course of action and whether or not the individual in question has committed other violations in the past.

6.2.3. Notwithstanding 6.2.2, cases of low complexity and/or low severity can be directly handled by the Head of Group Internal Audit ("**Head of GIA**" hereinafter) or respective Country Head of Pops, and he/she shall have the authority to decide on the appropriate Disciplinary Actions for cases under the Fast Track Investigation Protocol.

6.2.4. Where an investigation is commenced, no party shall be allowed to order a cessation or request for the investigation to be ceased.

6.2.5. No party shall be allowed to interfere or influence the investigation process in any ways at any point of the investigation. Failure to comply may result in Disciplinary Actions taken against the offender.

6.2.6. Where the Head of GIA is notified of case with nature of serious allegation, he or she may also make recommendation to the General Counsel and Chief People Officer to:

- Suspend the subject if there is any evidence of collusion, risk of leaking confidential information or intimidation of witnesses; or
- Terminate the subject or report them to the authorities, without going through the Remediation Councils, if both of the following criteria are met:
  - a. There are clear grounds for termination based on case facts and/or evidence obtained;
  - b. There are reasons to believe that the subject's continuing stay at Grab is likely to be detrimental to Grab or the welfare of other Grabbers.

6.2.7 The following persons may refer matters to the Global Remediation Council, which sits above the Regional Remediation Council, in the event that the Regional Remediation

Council is unable to reach a unanimous decision and/or they have identified concerns about the nature or severity of the decision any time before a decision is enforced:

- Any member or Chairperson of the Regional Remediation Council;
- Head of Regional People Operations / Head of People Partners & Rewards; or
- A member of the Global Remediation Council.

### **6.3. Response and Discipline for Violations**

6.3.1. Each employee, director and officer is responsible and accountable for adhering to this Code. Employees who violate provisions outlined in this Code could be subject to appropriate disciplinary action, including termination. The details are indicated in the Employee Handbook of Grab. For the purposes of this Code, “directors and officers” refers to Grab’s employees who are also directors and officers.

6.3.2. Employees, directors and officers who violate the laws and regulations previously mentioned in this Code could expose themselves and Grab to substantial criminal fines, prison terms and civil damages.

### **6.4. Compliance Standards and Procedures**

6.4.1. This Code is intended as a statement of basic principles and standards and does not include specific rules that apply to every situation. Its contents have to be viewed within the framework of Grab’s other policies, rules, SOPs, practices, instructions and the requirements of the law. This Code is in addition to other policies, rules, SOPs, practices or instructions of Grab that must be observed. Moreover, the absence of a specific corporate policy, rules, SOPs, practices or instructions covering a particular situation does not relieve you of the responsibility for exercising the highest ethical standards applicable to the circumstances.

6.4.2. If an employee needs guidance on a legal or ethical question or has witnessed or has knowledge of an illegal or unethical activity, he or she should seek the counsel of his or her supervisor. If approaching the supervisor is uncomfortable, or if the response is unsatisfactory, reporting avenues and procedures are described in more detail in the Company’s Whistleblowing Policy, available [here](#).

6.4.3. You will be governed by the following compliance standards:

- You are personally responsible for your own conduct and for complying with all provisions of this Code and for properly reporting known or suspected violations;
- If you are a supervisor, manager, director or officer, you must use your best efforts to ensure that employees understand and comply with this Code;

- No one has the authority or right to order, request or even influence you to violate this Code or the law; a request or order from another person will not be an excuse for your violation of this Code;
- Any attempt by you to induce another director, officer or employee of Grab to violate this Code, whether successful or not, is itself a violation of this Code and may be a violation of law; and
- Grab expects that every reported violation of this Code will be investigated.

6.4.4. All Grab personnel are expected to familiarize themselves with Grab's policies and procedures, as may be from time to time amended (collectively the "**Grab Policies**").

6.4.5. From time to time, Grab may provide self-training and/or conduct training to explain and reinforce the importance of complying with the Grab Policies, as well as applicable laws and regulations relating to Grab and its business. All Grab personnel shall make themselves available to attend and complete such training, and where required, obtain certification of completion of such training. Failure to complete any mandatory training may lead to loss of access to Grab systems as well as subject them to disciplinary, and remedial actions.

6.4.6. All Grab personnel are encouraged to report any breach or potential breach of the Grab Policies or laws or regulations that they become aware of, through the reporting channels described in the Whistleblowing Policy. Anyone unsure of what course of action to take should consult a member of the Grab Integrity Unit ("GIU" hereinafter) , for advice. Grab will not tolerate any adverse treatment against any Grab personnel who reports a breach or suspected breach in good faith, and any such retaliation is itself a breach of the Grab Policies.

6.4.7 Any Grab personnel involved in an investigation into a breach or attempted breach of the Grab Policies or laws or regulations shall cooperate fully with the investigations team, including without limitation:

- Submitting to interviews with the investigations team;
- Answering truthfully and fully all questions asked;
- Providing all electronic and hard copy records, documents and data requested by the team; and
- Submitting to the team any computer, tablet, phone, storage media or other electronic device used by the Grab personnel that may contain relevant information or communication, regardless of whether the device or media belongs to Grab or not.

6.4.8. It is important that investigations be allowed to proceed unobstructed. Care should therefore be taken not to alert suspected individuals or any other related persons that an investigation is underway. Accordingly, the Grab personnel shall NOT:

- Circulate any allegation they receive other than to GIU (or other persons designated under the Whistleblowing Policy and/or the Grab Safe and Respectful Workplace Policy);
- Attempt to personally conduct investigations or interviews, or clarify allegations; or
- Discuss or otherwise share information concerning the allegations or investigations with anyone, unless expressly instructed by the investigation team.

6.4.9. The following conduct shall be deemed misconduct and a breach of the conditions of employment that warrant disciplinary action, including immediate dismissal:

- Any breach or attempted breach of the Grab Policies or laws or regulations;
- Any conduct (or omission) that directed, approved, aided or intentionally/recklessly ignored such breach or attempted breach; or
- Any act or attempt to hinder, mislead or evade an investigation into a breach or attempted breach of the Grab Policies or laws or regulations, including but not limited to failing to fully give the cooperation described above, or destroying/hiding any records, documents, data, information and communication relevant to the investigations.

6.4.10. Violation of any of the standards contained in this Code, or in any other policies, rules, SOPs, practices or instructions of Grab, can result in disciplinary actions, including but not limited to dismissal and civil or criminal action against the violator. This Code should not be construed as a contract of employment and does not change any person's status as an at-will employee.

6.4.11. This Code is for the benefit of Grab. This Code does not, and should not be construed to, create any private cause of action or remedy in any other person for a violation of this Code.

6.4.12. The names, addresses, telephone numbers and e-mail addresses of the Head of Group Compliance, General Counsel, Head of GIA and the CFO are set forth below:

<b>Head of Group Compliance</b>	<b>General Counsel</b>	<b>Head of Group Internal Audit</b>	<b>Chief Financial Officer</b>
Ban Teck Ong  3 Media Close, #01-01, Grab HQ One North Singapore 138498  Email: banteck.ong@grabtaxi.com	Liam Barker  3 Media Close, #01-01, Grab HQ One North Singapore 138498  Email: liam.barker@grabtaxi.com	Michael Silitonga  3 Media Close, #01-01, Grab HQ One North Singapore 138498  Email: michael.silitonga@grabtaxi.com	Peter Oey  3 Media Close, #01-01, Grab HQ One North

## Document History

Version	Effective Date	Description	Prepared By	Approved By
1.0	17 August 2021	Initial Document	HHR, Kiat Seng Lee	Board of Directors
1.1	26 April 2023	Minor amendments: reflect organisational changes to the Compliance department reflect the changes to GIU's Investigation Protocol.	Brenda Wong, Hwee Ei Khng	Ser Jin Lee
1.2	27 April 2023	Minor amendment: insertion of clause 4.1.2 on responsible alcohol consumption	Pauline Teo	Hark Kah Tan
1.3	27 November 2024	Changes to details in 6.4.12	Shabana Shakuro	Ban Teck Ong
1.4	5 February 2025	Changes to details in 6.2	Joan Xue, Michael Silitonga, Iin Nugroho	Ban Teck Ong
1.5	9 June 2025	1. Amendment to clause 4.1.2. on alcohol and drugs consumption. 2. Updated all hyperlinks to Go links	Joan Xue, Zakwan Razak	Ban Teck Ong
2.0	3 September 2025	1. Added clause 4.1. Respect for Human Rights	Joan Xue	Ban Teck Ong
2.1	13 October 2025	Added hyperlink reference for clause 4.1.1	Zakwan Razak	Ban Teck Ong
2.2	2 March 2026	Changes to details in 6.2.7	Joan Xue	Ban Teck Ong

## References

This policy should be read in conjunction with the following document(s):

S/N	Document Title	Document No.
1	Anti-Bribery & Corruption (ABC) Policy	CORP-COM-001
2	Whistleblowing Policy	CORP-COM-002
3	Conflict of Interest (COI) Policy	CORP-COM-003
4	Gifts Entertainment, Meals (GEM) Policy	CORP-COM-004
5	Data Privacy Policy for Employees and Job Applicants	
6	Safe & Respectful Workplace Policy	

## Abbreviations

Abbreviations	Definitions
CEO	Chief Executive Officer
CFO	Chief Finance Officer
SEC	Securities and Exchange Commission
SOP	Standard of Practices
GIU	Grab Integrity Unit
GIA	Group Internal Audit