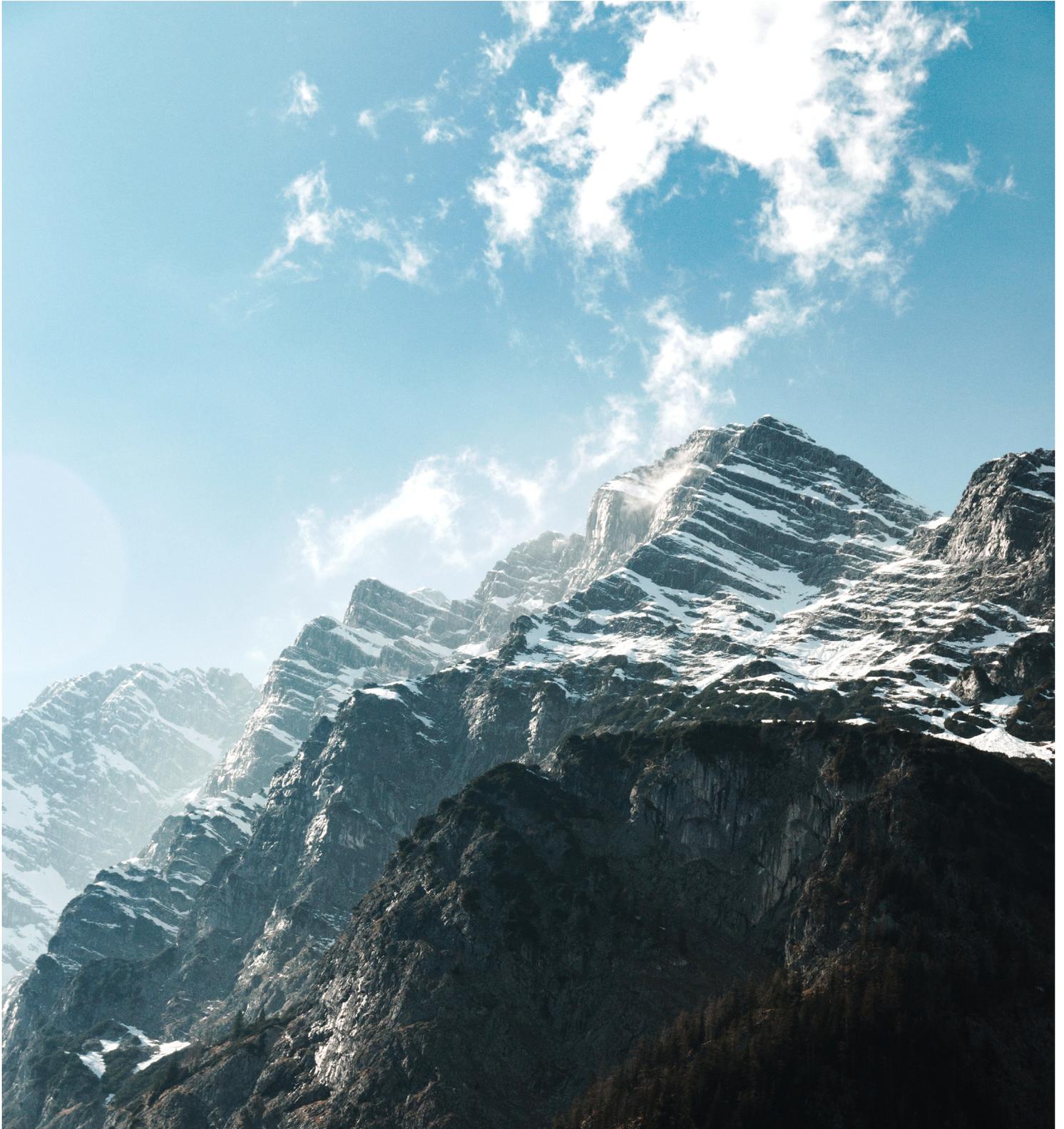


ANNUAL CORPORATE
RESPONSIBILITY REPORT





About This Report

This report covers the company's Corporate Social Responsibility (CSR) activities from our 2018 fiscal year until this report was published in March of 2019, unless otherwise specified.

In preparing this report and selecting the topics and metrics to include, we have referenced the reporting frameworks developed by the Sustainability Accounting Standards Board (SASB) and the Global Reporting Initiative (GRI).

This report is an important step in disclosing more about our CSR efforts. Moving forward, we will continue to closely review the company's overall strategies, create and use benchmarks to expand our efforts and commit our resources in the areas where we believe we can make a difference.

For questions or to provide feedback, please visit our website at www.bookingholdings.com or email at communications@bookingholdings.com.

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A Note From Our CEO

At Booking Holdings, we help millions of people experience the world every day through seamless technology powered by our six major brands.

With operations in more than 220 countries and territories worldwide, our teams work around the clock to build and improve the technology that empowers people to more freely travel across borders, time zones, languages and cultures. We fundamentally believe that travel can bring out the best in humanity, which is why we continue to invest in our brands and our people, to grow our business so that our technology can reach more people across the globe.

While I am incredibly proud of the global business we have built, I am continually reminded of an often-cited line by Sir Winston Churchill: "The price of greatness is responsibility." As a global Fortune 500 company, we have a responsibility not just to our customers, our employees and our shareholders, but to the world that we are working so hard to help people experience every day. We believe that the management of a company's environmental and social impacts is not only the right thing to do, but also a key part of this responsibility.

In 2018, we committed more resources than ever to varying Corporate Social Responsibility (CSR) efforts including initiatives to promote sustainable tourism, improve global business and tech industry diversity, reduce environmental footprints and create and improve healthier workplaces for our more than 24,000 employees across more than 300 office locations around the world. Some highlights include the second annual Booking Booster program, pioneered by our largest global brand Booking.com. Through this program, 10 start-ups dedicated to sustainable tourism received grants totaling €2 million. Booking Cares, Booking.com's flagship volunteer program that encompasses Booking Booster, amassed more than 30,979 hours of local community service across 447 projects in 2018.



Our brands also continue to lead efforts promoting increased awareness of gender parity issues, particularly within the technology sector. Recently OpenTable announced a commitment to 50/50 gender equity globally, and Booking.com launched their inaugural [Women in Tech Program](#), which provides scholarships and mentoring programs to women seeking to further their education and advancement in the technology and STEM sector. Two of our most global brands, Booking.com and Agoda, are comprised of more than 50% women, and with more than 150 nationalities across our 24,000+ employee base worldwide, we believe that our workplaces should reflect our customers and communities because it is both good business and good for the local economies.

These are initiatives I am very proud of, but this is just the beginning. We recognize that there is still more to be done and we are committed to ensuring a more sustainable future so that anyone, anywhere can experience the world for generations to come.

A handwritten signature in black ink, appearing to read "Glenn Fogel". The signature is fluid and cursive, written over a white background.

GLENN D. FOGEL
CHIEF EXECUTIVE OFFICER & PRESIDENT

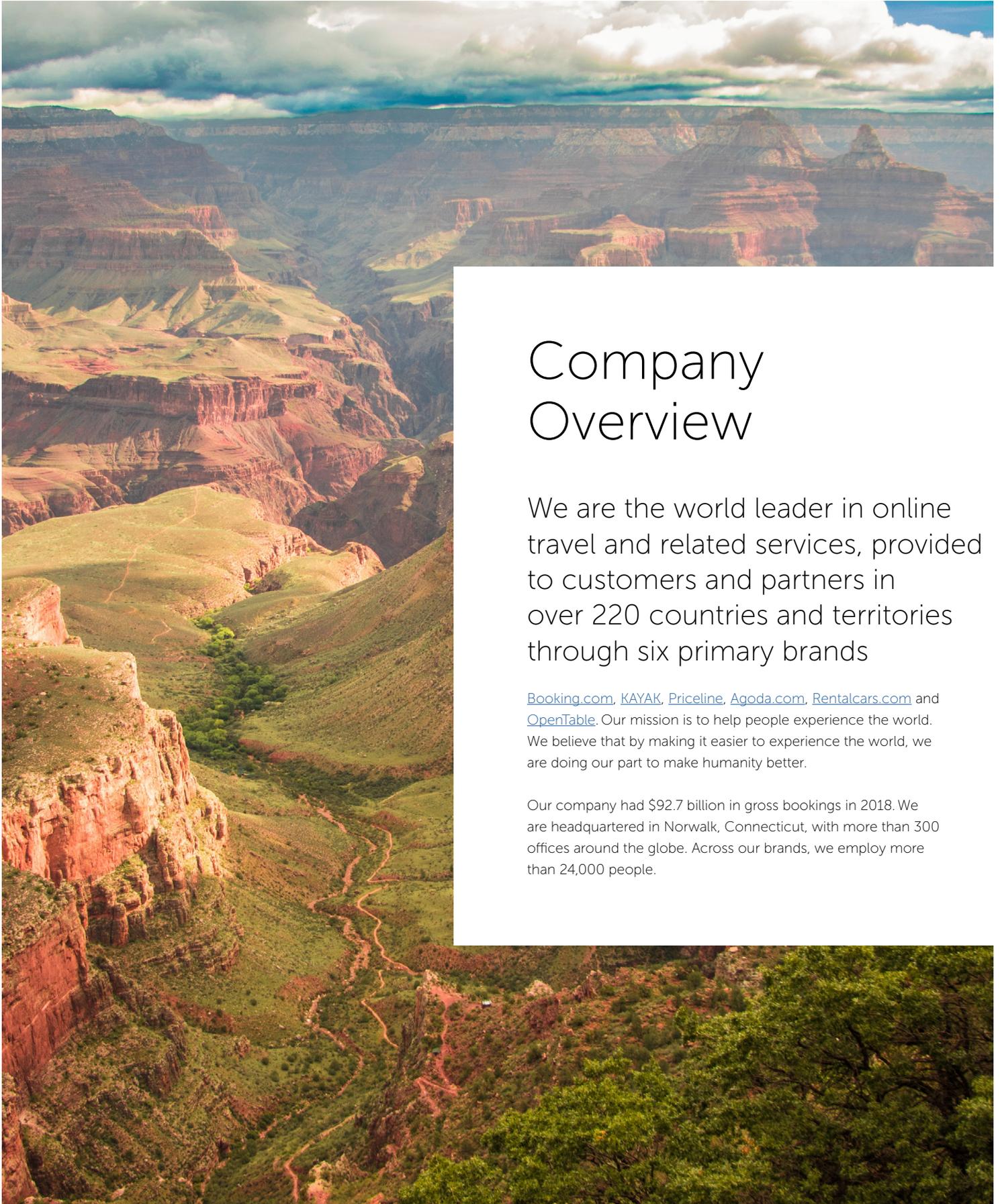


Our Approach to Corporate Responsibility

As a large and growing company in a rapidly shifting industry, our approach to Corporate Social Responsibility continues to evolve as we solidify our long-term vision for the company, and expand the breadth of brands and services we offer to consumers worldwide.

The epicenter of our CSR work is driven by Booking Cares, which supports innovation in the sustainable tourism space. This program is driven by our largest business and most global brand, Booking.com. Through an accelerator program that identifies and empowers sustainable tourism start-ups, a robust global volunteer program and a fund that champions non-profit sustainable travel projects, Booking.com is supporting the long-term health of a variety of locations around the world. The program focuses on five key areas: inclusive growth, tech for impact, the environment, tourism dispersal and cultural heritage.

This report is intended to capture and illustrate the activities taking place across our brands on topics related to: community engagement, environment, employees, ethics and integrity, customer privacy and governance. Together, these efforts create meaningful impact to affect real and lasting change.



Company Overview

We are the world leader in online travel and related services, provided to customers and partners in over 220 countries and territories through six primary brands

[Booking.com](#), [KAYAK](#), [Priceline](#), [Agoda.com](#), [Rentalcars.com](#) and [OpenTable](#). Our mission is to help people experience the world. We believe that by making it easier to experience the world, we are doing our part to make humanity better.

Our company had \$92.7 billion in gross bookings in 2018. We are headquartered in Norwalk, Connecticut, with more than 300 offices around the globe. Across our brands, we employ more than 24,000 people.

OVERVIEW

We operate through six primary brands



BOOKING.COM

Booking.com is the global technology leader in connecting travelers with the widest choice of incredible places to stay.

HEADQUARTERS

Amsterdam, the Netherlands, with 198 offices and call centers in 70+ countries worldwide.



KAYAK

KAYAK is the world's leading travel search engine with a mission to help people experience the world by creating their favorite travel tools.

HEADQUARTERS

Stamford, Connecticut, and operates sites in more than 60 countries



PRICELINE

Priceline is an online travel brand that offers more ways to save and more deals than any other travel site.

HEADQUARTERS

Norwalk, Connecticut



AGODA

Agoda is a global online accommodations provider, a technology innovator and a high-energy company based in the heart of Asia.

HEADQUARTERS

Singapore, with 45+ locations in 30+ countries



RENTALCARS.COM

Rentalcars.com is the world's largest online car rental and ground transport service.

HEADQUARTERS

Manchester, England



OPENTABLE

OpenTable is the world's leading online provider of restaurant reservations.

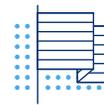
HEADQUARTERS

San Francisco, California

2018 HIGHLIGHTS



Booking Holdings conducted its first enterprise-wide carbon footprint analysis.



Booking Holdings sponsored the 2018 Pride Parade in New York City, with all US-based businesses participating in the parade.



BEST EMPLOYERS
FOR WOMEN



WORLD'S BEST
EMPLOYERS

Booking Holdings was ranked by Forbes in their "Best Employers for Women" and "World's Best Employers" lists.

2018 HIGHLIGHTS

Booking.com

10
START-UPS

€2
MILLION

10 start-ups dedicated to sustainable tourism were supported in the Booking Booster program, receiving grants totalling €2 million from the Booking Booster Fund.

12
NGO

€2
MILLION

12 NGOs were awarded grants totalling €2 million from the Booking Cares Fund.

€500,000
IN SCHOLARSHIPS

Booking.com's Women in Tech Program partnered with the University of Oxford and Delft University of Technology to provide €500,000 worth of scholarships to women looking to further their education and advancement in the technology sector.



30,979
HOURS

5,140
EMPLOYEES

447
PROJECTS

Booking Cares' global volunteer program amassed 30,979 hours by 5,140 employees across 447 projects.

2018 HIGHLIGHTS



50/50
GENDER EQUALITY

OpenTable announced a commitment to 50/50 gender equity globally.

2,730,000
MEALS

OpenTable's Giving Tuesday campaign generated a total of 2,730,000 meals for food insecure families.





Community Engagement

Caring deeply for the communities in which we operate is a foundational belief across our companies.

We are proud of our brands' philanthropy, volunteerism and giving programs that span the globe and positively impact the environment, people and communities.

Booking Cares, the epicenter of our CSR activity driven by our largest business, Booking.com, is focused on transforming the global travel experience into a powerful force for good through a series of bold initiatives — Booking Booster, Booking Cares Fund, Booking Cares Labs and Cares Volunteers — that support and scale sustainable tourism.

COMMUNITY ENGAGEMENT

By The Numbers 2018



30,979

VOLUNTEER HOURS

447

PROJECTS

5,140

EMPLOYEES

191

OFFICES

Booking Cares volunteers donated 30,979 hours to 447 projects 5,140 employees from 191 offices participated in the Booking Cares program.

€54.2K

TOTAL DONATION TO
EMERGENCY RESPONSE
INITIATIVES

€2M

BOOKING BOOSTER
TOTAL GRANT FUND

€2M

BOOKING CARES
TOTAL GRANT FUND

COMMUNITY ENGAGEMENT

Booking Booster

Launched in 2017, the Booking Booster program works to support innovation within the sustainable tourism industry by giving start-ups the tools, skills, resources and networks they need to create lasting change.

In 2018, 10 start-ups were given the opportunity to pitch for grants of up to €500,000. They received three weeks of coaching and workshops with Booking.com experts before pitching their plans to a live audience and panel of judges. The ten winners, who came from six different countries and operated across six continents, including Antarctica, were awarded grants from the €2 million Booking Booster Fund.



“One of the biggest benefits of mentoring and working together with these inspiring start-ups and changemakers is that it also introduces new ideas to the Booking.com business and helps invigorate our own people.”

MARIANNE GYBELS
HEAD OF CSR

2018 Winners

[SAKHA CONSULTING WINGS:](#)
[WOMEN ON WHEELS](#)

[GLOBAL HIMALAYAN EXPEDITION](#)

[COMMUNITY HOMESTAY NETWORK](#)

[KETEKA](#)

[WHEEL THE WORLD](#)

[HIVESTERS](#)

[HOTEL CON CORAZÓN](#)

[KITRO](#)

[REFLOW](#)

[TASTEMAKERS](#)

COMMUNITY ENGAGEMENT

B. Spotlight: [Sakha Supports Women Drivers](#)



Sakha, a 2018 Booking Booster award winner, provides safe and reliable transportation services for women by women across India. In doing so, Sakha provides women with an unconventional, sustainable and dignified livelihood.

There was no market for women-driven transportation services in India in 2008, when the company started. As part of the Women on Wheels program, delivered in collaboration with the Azad Foundation, Sakha employed women chauffeurs to provide safe transport to more than one million women across Delhi, Jaipur, Kolkata and Indore over the years. To date, Sakha has provided remunerative employment with dignity in transport to more than 500 women.

Many women drivers trained through Women on Wheels have been able to find jobs as chauffeurs employed by organizations and individuals, bus drivers, valets at prestigious institutions and driving instructors for other women.

Sakha enables resource-poor women in urban India to reclaim their dignity, rebuild their identity and be self-reliant, both socially and financially. By providing safe transport to women, Sakha has also contributed to increased mobility and safety of women in the cities, including foreign female travelers.

COMMUNITY ENGAGEMENT

Booking Cares Fund



Another initiative is the Booking Cares Fund, which was launched at the end of 2017 to support the wider sustainable tourism industry and all players within it.

The Fund champions non-profit sustainable travel projects which present new and unexpected solutions to reimagine the industry. Projects come from and take place all over the world representing universities, non-profits, research institutes and governments.



These initiatives are only the beginning of how Booking.com is supporting sustainable tourism for the long-term. Looking toward the future, the business will look to expand by integrating sustainability features into the brand's products.

The first-ever Booking Cares fund recipients received grants between €100K and €250K and included:

A ground-breaking research project that aims to understand the effects of nature-based tourism on behavioral change.

A platform to provide accessible tourism information, services and cultural experience opportunities for Chinese travelers with a disability (85 million people) and 220 million people over 60.

A cutting-edge hospitality academy in South Africa for disadvantaged women.

COMMUNITY ENGAGEMENT

Booking Cares Labs

At the end of 2017, Booking Booster gave rise to Booking Cares Labs, which supports early-stage sustainable tourism start-ups through high-intensity, three-day regional programs in places around the globe such as Amsterdam, Tel Aviv and Barcelona.



COMMUNITY ENGAGEMENT

B. Spotlight: Cares Volunteerism



For the past four years, the Booking.com Cares Volunteer Program has enlisted employees to contribute their time and expertise to help improve destinations worldwide. The program's participation rate has remained consistent at 40% even as the company has grown.

Recently, Booking Cares volunteers have:

Restored the beautiful coral ecosystem in Sattahip, Chonburi, by coming together to plant new corals and raise awareness of the importance of conserving the underwater environment.

Lent a hand to the National Elephant Conservation Centre in Kuala Lumpur by scrubbing the paddocks and assisting with maintenance and landscaping, giving these rescued elephants a more suitable home.

COMMUNITY ENGAGEMENT

 Spotlight: [OpenTable's Giving Tuesday](#)



OpenTable has been a national sponsor and partner of Share our Strength's No Kid Hungry® campaign for the past 12 years. The campaign works to end childhood hunger in America.

OpenTable sits at the center of a marketplace between diners and restaurants. With this in mind, the brand conceived of a campaign to allow diners to tap into the season of giving while leveraging OpenTable's strong diner and restaurant networks. For two weeks, starting on Giving Tuesday, OpenTable diners were able to donate their OpenTable Dining Points to the Share the Strength's No Kid Hungry® campaign.

The results of the 2018 campaign far exceeded expectations:

At the campaign's conclusion, 28,000+ people donated a total of 2,480,000 meals. When added with the 250,000-meal match by OpenTable, the campaign generated a total of 2,730,000 meals.

With an initial goal for this campaign to generate 500,000 meals total, the campaign exceeded its goal.

COMMUNITY ENGAGEMENT

Stepping Up In Communities

Other brands are doing their part to develop and execute their own social impact programming that aligns with their priorities and passions.



Agoda launched its official CSR program in 2018 with a goal to support and scale employee-nominated projects that address a key issue in local communities.

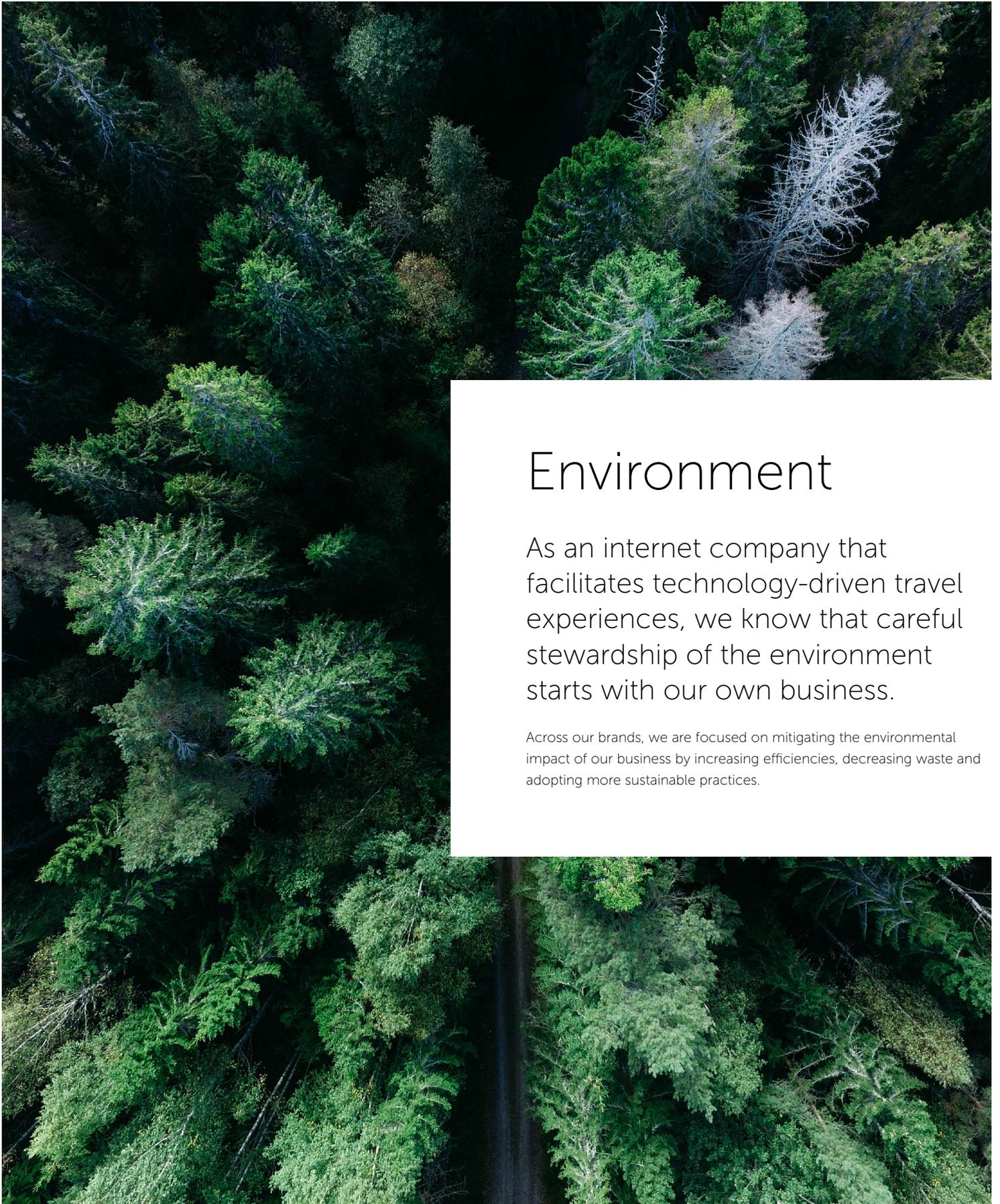
Through this program, the company has supported Doctors Without Borders, donating \$50,000 at the end of 2018. Other localized projects have taken place across Asia. In the Thailand office, more than 70 employees got together for the Give a Dam project, where employees built a check-dam in the Phetchaburi forest to help sustain wildlife in the forest.

In Myanmar, the Agoda team held an event in collaboration with Thant Myanmar to raise awareness on reducing plastic usage in the tourism sector. Employees provided training and toolkits and helped Agoda hotel partners set commitments to reduce single-use plastics in their properties. 71 hotels participated, and 73% set plastic reduction commitments.

In Singapore, the team participated in the AmCham Walk for Rice event, contributing one bowl of rice for every 100m walked.

There have also been numerous other local efforts in India, Hong Kong, and Indonesia, as Agoda continues to support issues that matter to the different markets in their own unique ways.

In addition, Priceline donated more than 1,000 turkeys for its Thanksgiving Turkey Drive, an annual tradition that has taken place for more than 10 years.



Environment

As an internet company that facilitates technology-driven travel experiences, we know that careful stewardship of the environment starts with our own business.

Across our brands, we are focused on mitigating the environmental impact of our business by increasing efficiencies, decreasing waste and adopting more sustainable practices.



ENVIRONMENT

Energy Use & Emissions

We have offices in more than 70 countries and territories around the world, and we are powered by 16 major data centers, which are leased in the U.S., the U.K., Switzerland, the Netherlands, Germany, Singapore, Russia, Hong Kong and China.

With a commitment to measuring and understanding our carbon footprint, this year we conducted our first enterprise-wide audit of our energy use and greenhouse gas emissions. The results will allow us to measure the impact of operations and help us identify our priority areas to address in the coming years.

ENVIRONMENT

Energy Use & Emissions cont.

Nearly all of our energy use and emissions are from electricity use in our leased office spaces and data centers. In calendar year 2017, our total Scope 1 and Scope 2 GHG emissions were estimated at 51,335 tonnes of CO2e. Electricity use in our leased data centers and office spaces contributed to almost 90% of our carbon footprint, with data centers representing nearly half and our offices representing 40% of our impact. The remaining 12% of GHG emissions are from our customer service centers located throughout the world. Among the 16 data centers we operate globally, 73% of energy use for data centers is from our Amsterdam and Slough, England, locations.

Annual Performance Data

ENERGY USE

TOTAL ENERGY CONSUMPTION (MWh)

131,895

GHG EMISSIONS

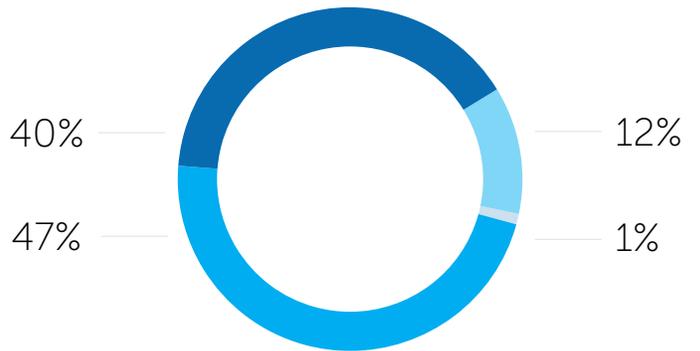
TOTAL SCOPE 1 & 2 (TONNES CO2e)

51,335

SCOPE 1	3,372
SCOPE 2	47,963

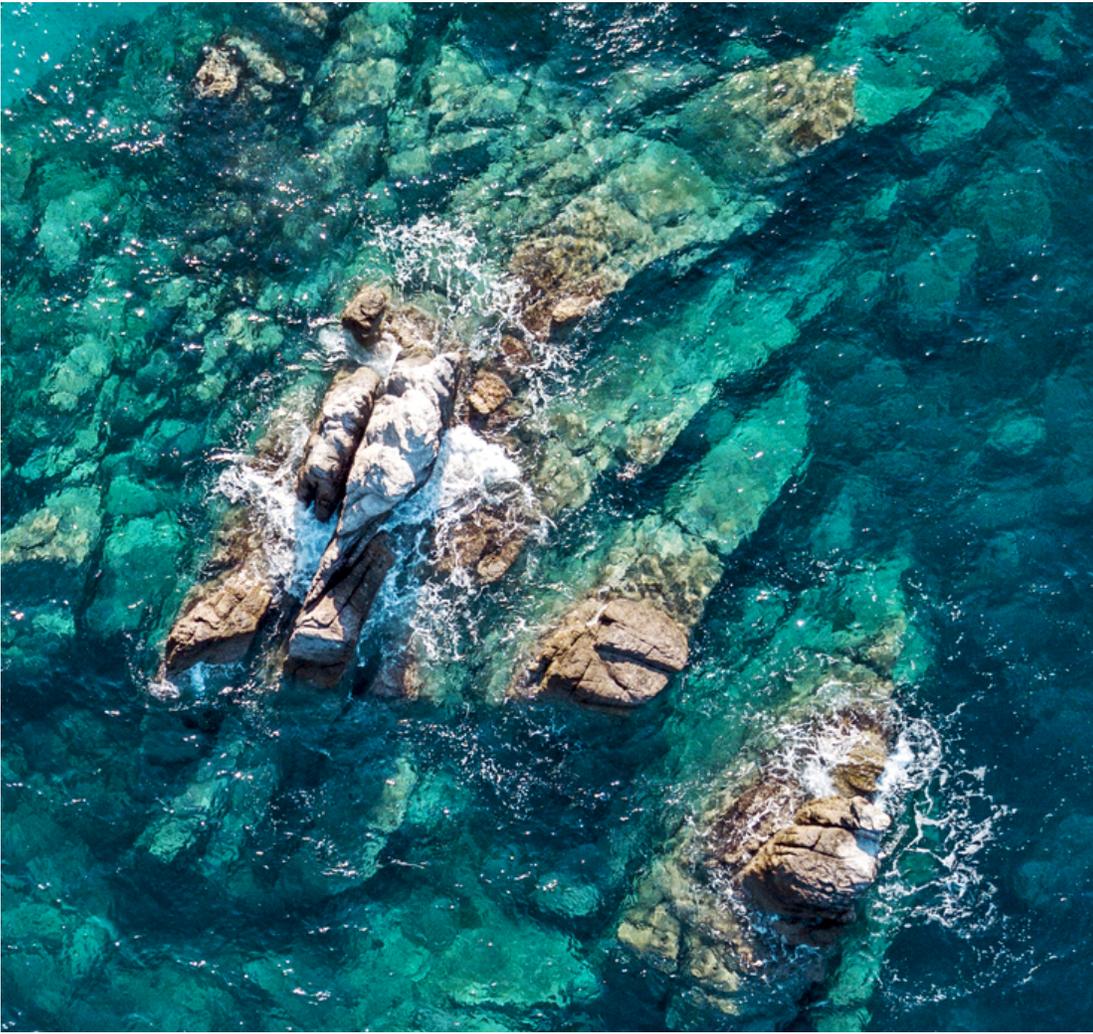
2017 GHG EMISSIONS BY SOURCE

- DATA CENTERS
- OFFICES
- CALL CENTERS
- WAREHOUSES & COMPANY-OPERATED VEHICLES



Because we lease our office spaces and data centers, we are limited in our ability to address the source of our energy use directly. Our purchase of renewable energy reflects what is available for purchase in the electricity grid in the countries where our office spaces and data centers are located.

Across our offices, we engage with property managers to implement energy efficiency programs and incentives. Meanwhile our largest business, Booking.com, is developing a building for its headquarters. This will be the first building owned by any of our brands with the aim to be accredited with a Building Research Establishment Environmental Assessment Method (BREEAM) excellent certificate, giving us more direct control over our energy-efficiency initiatives.

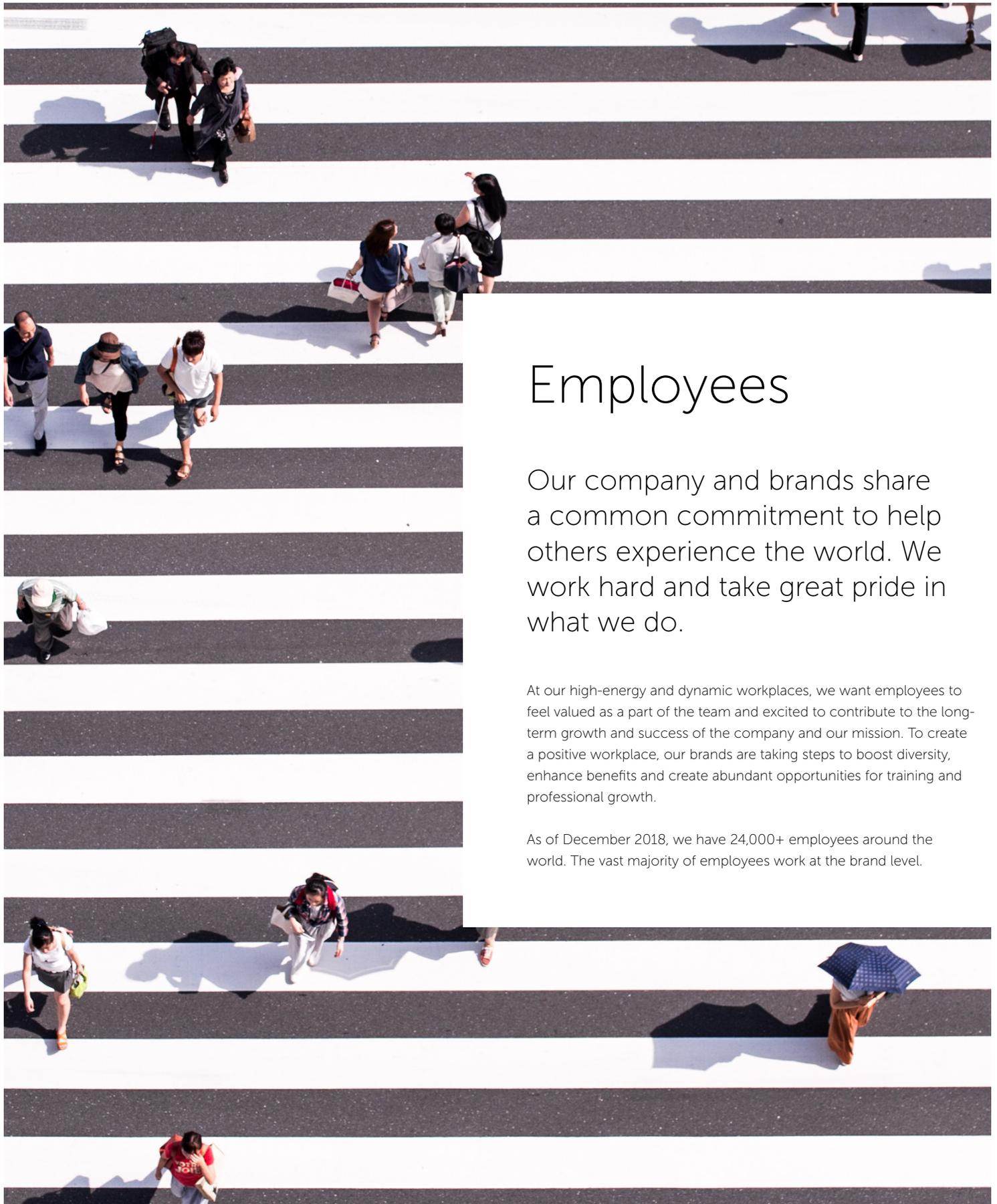


ENVIRONMENT

Water Use & Waste

Our highest source of water consumption comes from our data centers, and because we lease all of our data centers, we do not have access to the data on water use. But across our offices, we are reducing our water use through a number of water efficiency initiatives, such as installing low-flow and automatic faucets.

The majority of our waste impact is related to standard office operations. Each brand manages waste independently in accordance with regulations in each country of operations. Booking.com implements building design principles that reduce construction waste and incorporate waste separation in all offices supported by the local destination. OpenTable's San Francisco office partners with a company to collect e-waste such as old monitors, keyboards, cables, servers, and desktops—and both of its Denver locations utilize their respective buildings' e-waste recycling programs. Across North America, OpenTable works with a partner to pick up all recyclable electronic items.



Employees

Our company and brands share a common commitment to help others experience the world. We work hard and take great pride in what we do.

At our high-energy and dynamic workplaces, we want employees to feel valued as a part of the team and excited to contribute to the long-term growth and success of the company and our mission. To create a positive workplace, our brands are taking steps to boost diversity, enhance benefits and create abundant opportunities for training and professional growth.

As of December 2018, we have 24,000+ employees around the world. The vast majority of employees work at the brand level.



EMPLOYEES

Diversity & Inclusion

With more than 150 nationalities across our employee base worldwide, diversity is at the core of our company culture, and we are committed to making our company one of the most diverse and gender-balanced tech companies in the world. We believe that when our workplaces reflect our customers and communities, we create a stronger business and a better future.

As a corporation, we are continuously looking for ways to promote inclusive cultures. Recently, Booking.com conducted a cultural assessment of the Leadership Team and held workshops on inclusion and unconscious bias training for corporate employees.

EMPLOYEES

Diversity and Inclusion cont.

We continue to focus on developing women leaders and recently completed the third, and largest, cohort of the Booking Holdings Women in Leadership Program, which brings together women leaders across our six businesses to provide mentorship and facilitate networking. In 2018, we launched an alumnae community for the current and future graduates to connect and network.

CALL OUT



In 2018, Booking Holdings was ranked on Forbes list of the "Best Employers for Women."



Three (23%) members on the Booking Holdings' Board of Directors are women.



The CEO of our largest business, Booking.com is a woman.

50%

50% of the brand CFOs across the company are women.

Our brands are also rolling out education, recruiting, mentoring and hiring initiatives that support and encourage a diverse and inclusive workforce that enables individuals from all backgrounds, genders, cultures and perspectives to reach their full potential.

Recently, OpenTable has made a concerted effort toward hiring more women, with much success. This effort includes reviewing and updating job descriptions to eliminate unintended gender bias through Textio to ensure accuracy. As the applicant pool grows and diversifies, OpenTable will be working to ensure that at least two women candidates appear on the finalist list for consideration for every engineering hire.

EMPLOYEES

Spotlight: Unity in Diversity



At Booking.com, more than half of the workforce is made up of women, and 20% of the technology focused teams are women.

In 2018, employees in the tech department nominated and recognized internal technology playmakers — employees who had either been a role model or were active in driving diversity within the workplace. They also launched an internal mentorship program, focused on accelerating the development of women employees — developers, designers, data scientists and team leaders — in growing their technical and/or leadership career.

With more than 50% of the workforce comprised of women at Agoda, a grassroots women's network was formed — bringing together women from all departments across the organization. Fireside chat panels are held featuring dynamic women leaders in the organization throughout the year. Agoda's desire to improve support and recognition of women leaders also led to the launch of its inaugural Women's Leadership Initiative. The intensive program was driven by a cohort of senior and emerging tech and non-tech leaders with a focus on cross-cultural leadership, unconscious bias and transformations. A second cohort will be launched in 2019.

EMPLOYEES

Beyond The Workplace

“We still see gender bias in the workplace, especially in the tech industry, although it is getting better. While we are on the right track, there is still so much further to go. We need the tech industry to be even more diverse, and it’s the responsibility of tech companies and leaders to push for positive change, both within and outside the walls of their companies.”

GILLIAN TANS
BOOKING.COM CEO

We are proud of our brands’ work to create more inclusive communities and connections beyond the workplace.

In 2017, OpenTable launched its OpenKitchen campaign, as part of its commitment to help end the historically exclusionary, abusive restaurant culture. This campaign included webinars for restaurant leaders focused on anti-harassment practices and gender inclusivity, and workshops on topics such as how to be an ally in the workplace and how to create an inclusive culture for the LGBTQIA community.

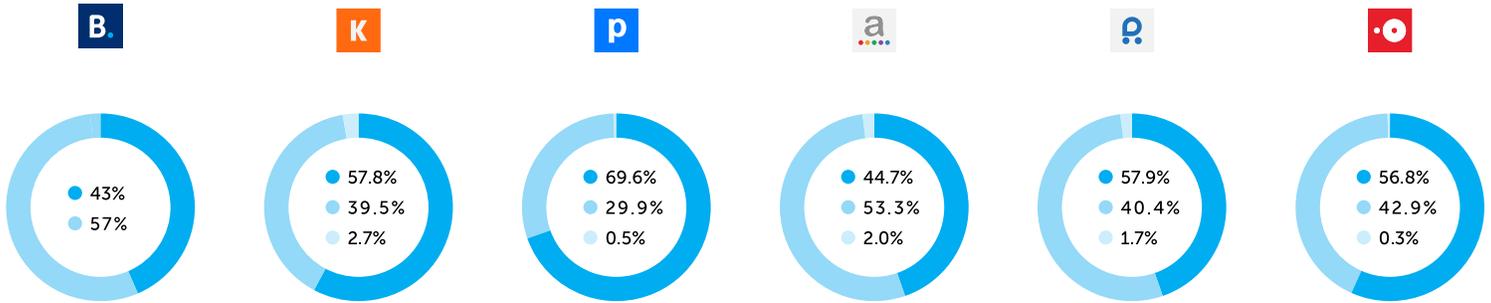
In 2017, Booking.com launched its Women In Technology program and partnered with Web Summit, the largest tech conference in the world, to host a Women in Tech networking and mentoring program in an effort to create more opportunities for women to enter, advance and thrive in the technology sector. In 2017, the mentoring event attracted nearly 200 mentees, matched with 60 high-profile industry mentors. In its second year, in 2018, the event matched more than 500 mentees with 350 high-profile mentors. As part of the Women in Technology program,

Booking.com also launched scholarship programs in partnership with the University of Oxford in the UK, and the Delft University of Technology (TU Delft) in the Netherlands. The program consisted of [15 scholarships that were granted to women](#) looking to further their education and advancement in the technology sector. The grants equaled €500,000 across both university partnerships.

Booking.com also launched its Technology Playmaker Awards in 2017, and extended the program into 2018. The program is designed to celebrate and recognize women who have disrupted or are transforming businesses, industries and communities through the use of technology. There are 7 individual award categories, each with a €5,000 prize. Individual winners also have a chance to win the top prize of €10,000 and become the Booking.com Technology Playmaker of the Year.

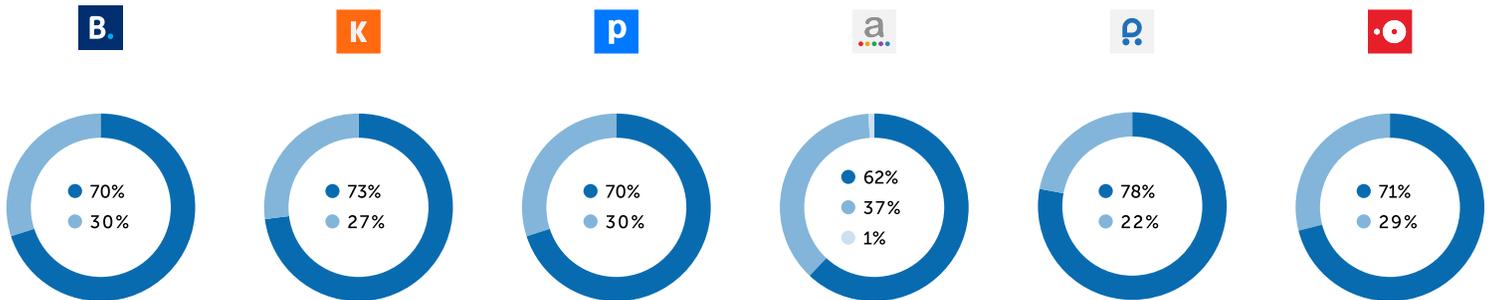
Employee Diversity ● MALE ● FEMALE ● OTHER

as of Q4 2018



Executive Diversity ● MALE ● FEMALE ● OTHER

as of Q4 2018





EMPLOYEES

Employee Engagement, Training & Well-Being

Across our brands we aim to facilitate a company culture where each employee feels engaged, connected, healthy and professionally fulfilled. Our efforts are working. One way our brands provide a rich experience for employees is by providing a myriad of opportunities for employee engagement. Employee resource groups are one example of how employees find connection and engagement. These groups, such as Agoda's Life Groups, provide spaces for employees to share their interests, backgrounds and talents. Life Groups are designed to create inclusive environments in light of the company's rapidly growing talent diversity. There are more than a dozen active Life Groups formed around varying areas of interest from fitness to music to machine learning.

Driven by a global wave of evangelizing wellness to help alleviate "office syndrome," fitness-related Life Groups (yoga, football) have organically expanded to multiple locations such as Bangkok, Shanghai, Seoul, Budapest and New York.

As the Life Groups mature, Agoda will continue to investigate new ways to utilize the groups' power and their diverse membership to drive positive business results.

Across our brands, we are working to support employees with manager training, peer-to-peer learning, mentorship programs and new tools that focus on self-directed learning. Some brands focus on executive leadership, such as Priceline, which launched an executive leadership program for top leaders called Elevate. Other brands are focusing on collaboration, such as Rentalcars.com, which has brokered partnerships with specialist learning sites including LinkedIn Learning and Safari Books.

Employee health is another top priority. Each brand follows mandated policies for health care benefits, which vary widely from country to country. We perform regular benchmarking of benefits and wages to ensure it remains competitive in what it offers and that it complies with local laws and regulations.

OpenTable's family-friendly benefits earned it a "Healthy Mothers Workplace Award." Benefits include up to 10 weeks of paid leave, wellness rooms with hospital-grade pumps for new moms and a service that makes it easy to ship breast milk home during business travel. OpenTable also offered LUCY, a service for one-on-one coaching of new and expecting parents to support their transition back to work.

EMPLOYEES

 Spotlight: Prioritizing Mental Health

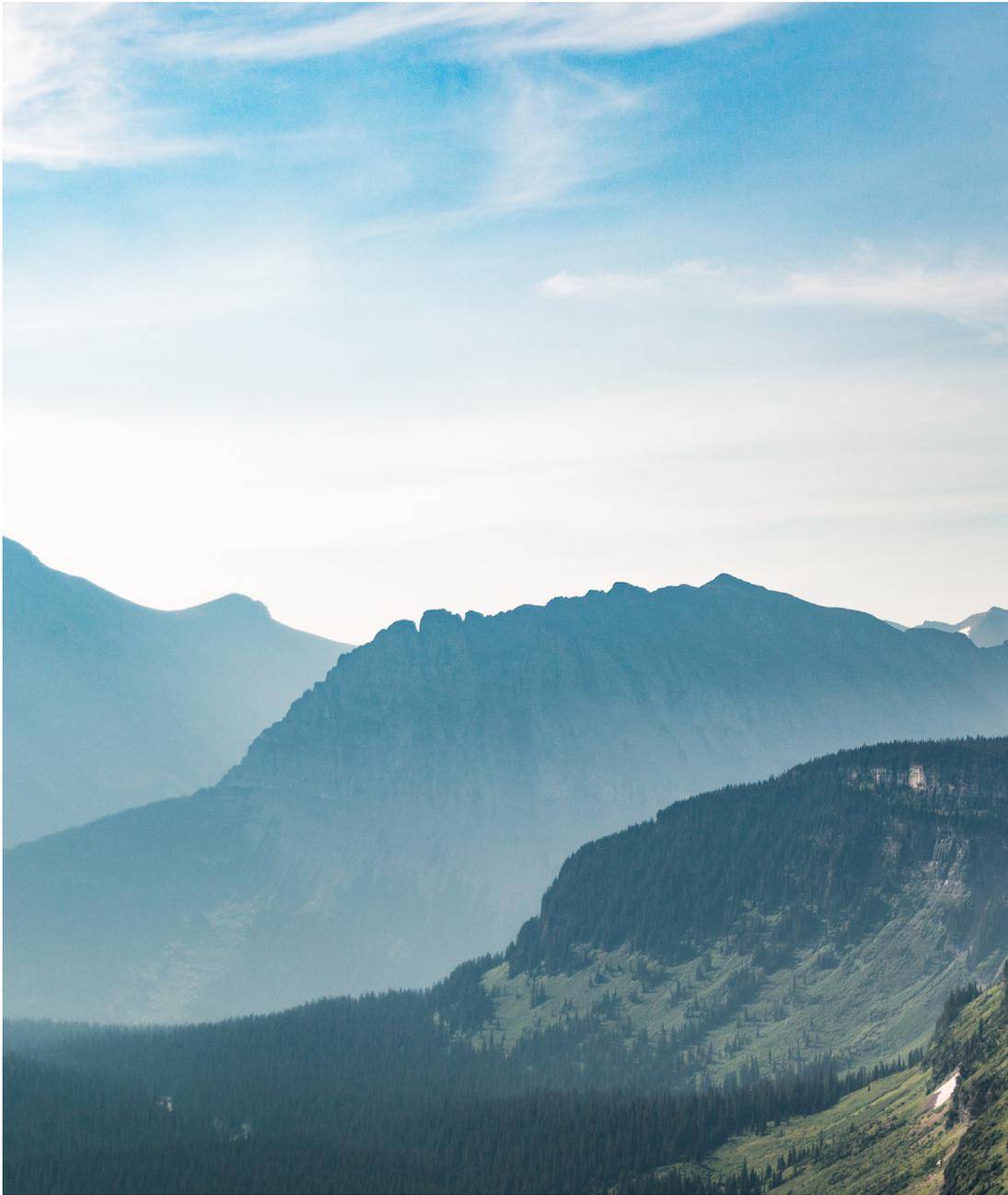


Rentalcars.com believes that good mental health of its employees is key to creating a truly amazing place to work. To this end, the company is taking steps to make mental health a top priority.

The company's Mental Health First Aiders programs supports colleagues suffering from mental health issues by introducing them to practical steps they can take to maintain good mental health. In addition, the organization is equipping managers with the information they need to spot and handle employee mental health issues.

To reduce the stigma, Rentalcars.com has focused on raising consciousness of this often-misunderstood issue. During Mental Health Awareness Week, employees took advantage of onsite massage

therapists and workshops on resilience, stress, anxiety, meditation, yoga and mindfulness. During that week, colleagues were encouraged to share their own stories. The positive reception to these stories modeled that it was OK to discuss mental health and that the company is there to offer support to ensure the good mental health and wellbeing of employees.



EMPLOYEES

Ethics & Integrity

Our culture is rooted in integrity. We are committed to conducting business ethically and legally to achieve the right results, the right way. Ethical business practices unite all of our brands across the world.

Our [Code of Conduct](#) provides guidance for our employees and suppliers about anti-bribery and corruption, fair competition and antitrust, privacy and data security, non-discrimination, and reporting and investigation among other topics. We also have formal policies regarding [political contributions](#).

EMPLOYEES

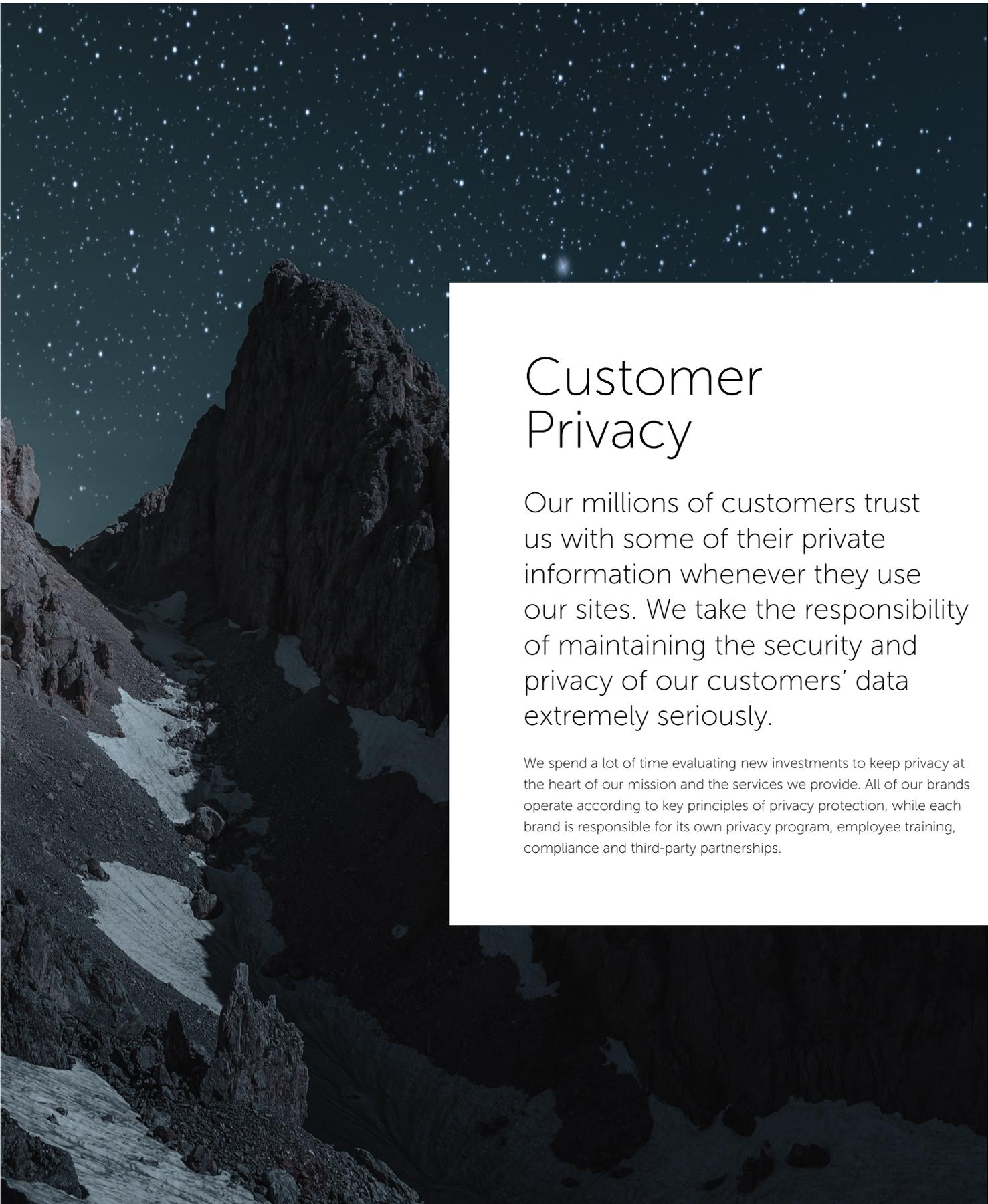
2018 Compliance & Ethics Highlights

In order to hold ourselves to the highest standards of integrity, we recently embarked on a journey to improve our global Compliance and Ethics Program.

The first part of this effort was a company-wide survey, which assessed the overall ethical culture and the Program's effectiveness. The survey found that Booking Holdings has a strong ethical culture. However, there were opportunities for improvement: Employees reported that while ethical subcultures exist, unethical behavior is underreported; they expressed a desire for more awareness about the company's Compliance & Ethics Program.

The assessment concluded that a lot of good steps have been taken in the area of ethics and compliance, and it also pointed to gaps in the current program implementation. Under the new program, all brands are

expected to operate and measure progress through key performance indicators. In addition, a greater emphasis will be placed on manager responsibility for driving compliance and ethics messages into their teams. To do this, managers will be better trained and given resources and action plans to meet this standard. To start, we recently launched an initiative called Ethics Moments, periodic manager-led discussions in which managers and their teams stop, think, and talk about compliance and ethics topics, initiatives or policies.



Customer Privacy

Our millions of customers trust us with some of their private information whenever they use our sites. We take the responsibility of maintaining the security and privacy of our customers' data extremely seriously.

We spend a lot of time evaluating new investments to keep privacy at the heart of our mission and the services we provide. All of our brands operate according to key principles of privacy protection, while each brand is responsible for its own privacy program, employee training, compliance and third-party partnerships.

CUSTOMER PRIVACY

2018 Highlights



BOOKING.COM

Booking.com operates to the strictest security standards which are enshrined in their privacy principles. These principles ensure that Booking.com complies with GDPR and that they strictly only use customer data to serve customers in line with their expectations.



KAYAK

KAYAK completed a General Data Protection Regulation (GDPR) plan, resulting in 65 million inactive user accounts deleted. All KAYAK offices with engineering or marketing employees were trained in person. KAYAK also successfully deleted legacy data and semi-automated its data subject rights practice.



RENTALCARS.COM

Rentalcars.com rolled out a mandatory privacy and security training for all employees, and developers also had secure code training.



OPENTABLE

OpenTable achieved SOC 2 certification, an auditing procedure to ensure industry-leading privacy standards are met for customer data. As of Q4 2018, OpenTable was live with GDPR on both its consumer and restaurant systems.



CUSTOMER PRIVACY

Governance

Our company has governance practices and policies in place to ensure business conduct and performance aligns with the interests and expectations of stockholders and other stakeholders.

The Board of Directors provides oversight and counsel to management and represents the interests of stockholders. As of December 2018, the Board is composed of 13 members, the majority of whom are independent, including an independent lead director. There are three Board committees: Audit, Compensation, and Nominating and Corporate Governance. Only independent directors serve on the committees.

