

ANNUAL CORPORATE RESPONSIBILITY REPORT



About This Report

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

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

Our company is committed to the regular publication of a CSR report, and we aim to continue to create and use benchmarks to expand our efforts and commit our resources in the areas where we believe we can make a difference. This report is intended to capture and illustrate the activities taking place across our brands — Booking.com, KAYAK, Priceline, Agoda, Rentalcars.com and OpenTable — on topics related to community engagement, the environment, employees, customer privacy and data protection, as well as governance.

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

*Throughout the report, figures in \in have been converted into \$ at a rate of 1.10.



A Note From Our CEO

This year, our industry is facing extreme challenges as the COVID-19 pandemic is changing the world, including the global travel industry, in unprecedented ways.

We at Booking Holdings believe that this global crisis makes our responsibility toward sustainability more important than ever. The United Nations World Tourism Organization (UNWTO) defines sustainable tourism as "tourism that takes full account of its current and future economic, social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities." In the face of a pandemic, it is this holistic view that will allow us to lead our industry toward a more stable and inclusive future.

While COVID-19 has impacted some of our immediate plans, it hasn't changed our mission: to make it easier for everyone to experience the world. Since our founding, we have worked to create a purposedriven company focused not just on short-term profits and challenges, but on setting long-term goals that will benefit travelers today and for generations to come. This commitment to fostering sustainability environmentally, socially and as a corporation—supports us to weather the storms we are currently passing through without compromising our identity.

Looking back at 2019, we made important strides on our journey toward improving sustainability efforts, with our efforts captured in this report.

We invested in companies and organizations who share our ambitious goals for sustainable travel. Last year, Booking.com's CSR program changed its name from Booking Cares to the Booking Sustainability Team, reflecting our ongoing commitment to broader sustainability initiatives.

In 2020 and beyond, we will face challenges that we couldn't have imagined even one year ago. However, we already knew that the road to a sustainable future would be a long and winding one, and that it would require humility, strong partnerships and perseverance. We remain committed to our path and undaunted by the obstacles we face.

The American novelist John Steinbeck wrote, "We do not take a trip; a trip takes us." Here at Booking Holdings, I am struck by where our journey toward sustainability has taken us so far, and what that will mean in the years to come. We realize now more than ever that we can't anticipate what the next year holds in store, but we continue to push forward with hope, courage and confidence in what we can achieve. I invite you to join us.

GLENN D. FOGEL CHIEF EXECUTIVE OFFICER & PRESIDENT

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How We Approach Corporate Social Responsibility

Our approach to corporate social responsibility continues to evolve along with our rapidly changing industry. In 2019, sustainability continued to be a focus for our company. Across our brands, we made strides to catalyze innovation, help communities thrive, act as responsible environmental stewards and create inclusive services and programs for employees and customers. While change was rapid in the tourism space, one thing remained consistent – our commitment to make a meaningful and lasting contribution to the global community.

Our CSR work was driven by our largest business and most global brand, Booking.com. In 2019, the brand's CSR program changed its name from Booking Cares to the Booking Sustainability Team, reflecting Booking.com's increased ambition and commitment to broader sustainability topics. Through three core programs under the umbrella of the Booking Sustainability Team, Booking.com supported sustainable tourism in varying ways:



Booking Booster

An accelerator program that identified and funded sustainable tourism startups and provided €2 million (\$2.2 million) in grants



Booking Volunteers

A program where employees volunteer their time and expertise to partner with local organizations on projects that help improve destinations worldwide



Booking Cares Fund A fund that provided €1.28 million (\$1.4 million) in grants to nonprofit sustainable travel projects

In 2019, our brands harnessed unique passions, expertise and talents to tackle community and environmental challenges facing our industry – and the world. This included forging partnerships with others who believe in a shared responsibility to the planet and to each other. A highlight was a bold global initiative co-founded by Booking.com called Travalyst, aimed at encouraging sustainable tourism practices across the travel industry. Led by the Duke of Sussex, Travalyst was founded by Booking.com, Trip.com, Skyscanner, TripAdvisor and Visa with the vision to improve conservation, increase environmental protection and expand local community economic development.

Company Overview

Booking Holdings is the world's leading provider of online travel and related services, provided to consumers and local partners in more than 230 countries and territories through six primary consumer-facing brands:

Booking.com, KAYAK, Priceline, Agoda.com, Rentalcars.com and OpenTable. Collectively, Booking Holdings operates in more than 40 languages across Europe, North America, South America, the Asia-Pacific region, the Middle East and Africa. The mission of Booking Holdings is to make it easier for everyone to experience the world.

We had \$96.4 billion in gross bookings (the total dollar value, generally inclusive of taxes and fees, of all travel services booked by our customers, net of cancellations) in 2019, with more than 300 offices around the globe employing more than 26,000 people.



2019 Highlights



Amount in grants provided by the Booking Booster and Booking Cares Fund to 16 organizations from 12 countries that are advancing sustainable tourism **€3.2 M converted to \$3.5 USD at an exchange rate of 1.10.*

53%

Increase in nominations for recipients of Booking.com's Technology Playmaker Awards, a program that recognizes women pioneering innovation and business achievements across the technology sector



Booking.com's ranking by the *Financial Times* on its list of Europe's most diverse and inclusive companies

2.37 M MEALS

Number of meals OpenTable employees provided to food-insecure families through OpenTable's Giving Tuesday campaign.



Number of volunteer hours contributed by employees across Booking Holdings' brands in 2019

	overview Our Brands	
Booking.com	BOOKING.COM Booking.com is a global online leader in connecting travelers with the widest choice of incredible places to stay.	HEADQUARTERS Amsterdam, the Netherlands
K A Y A K	KAYAK KAYAK provides an online price comparison service (often referred to as "meta-search") that allows consumers to easily search and compare travel itineraries and prices.	Stamford, Connecticut
priceline.com [.]	PRICELINE Priceline is a leader in online discount travel.	Norwalk, Connecticut
agoda • • • • •	AGODA Agoda is a leading global online accommodations provider based in the heart of Asia.	Singapore
Rentalcars.com	RENTALCARS.COM Rentalcars.com is operated as part of Booking.com and offers online rental car reservation services.	Manchester, England
• OpenTable ⁻	OPENTABLE OpenTable is a leading brand for booking online restaurant reservations.	San Francisco, California



Community Engagement

Making a Difference in Global Communities

Giving back to the communities where we live, work and do business is essential to how we operate. Through sustainable tourism initiatives, giving and volunteerism, in 2019 we became even more ambitious in our desire to create a tangible positive difference to people, the environment and communities.

KAYAK and OpenTable together launched their first corporate social responsibility program in 2019, Do Good, to harness the power of both brands to better the world together. Do Good is based on three pillars: community, innovation and sustainability.

In 2019, Agoda welcomed a new CSR team dedicated to sustainable travel, corporate giving and volunteering. Also in 2019, Booking.com and Agoda both became members of the Global Sustainable Tourism Council (GSTC), an organization that establishes and manages global sustainable tourism standards. As GSTC members, Booking.com and Agoda participate in a global network that contributes to protecting and sustaining the world's natural and cultural resources through widespread adoption of universal sustainable tourism principles.



Booking.com Sustainability Team

The core of our CSR activity was driven by our largest global business, Booking.com, with a focus on sustainable travel so that future travelers can continue to encounter a world full of destinations still worth exploring.

In 2019, the Booking Sustainability Team managed three full-fledged programs: **Booking Cares Fund**, **Booking Booster** and **Booking Volunteers**. The team focused its efforts on internal sustainability, sustainable supply, industry collaboration and reporting, operating at both a local and global level with governments, nonprofits and startups to support sustainable tourism.



COMMUNITY ENGAGEMENT Booking Cares Fund

Provided €1.28 million (\$1.4 million) in 2019 to support projects in the sustainable travel space.

The third edition of the Booking Cares Fund supported and funded startups, social enterprises and nonprofits to build solutions to sustainable travel challenges. The six projects that received funding spanned the globe.

2019 Booking Cares Winners

MAHOUTS ELEPHANTS FOUNDATION The foundation is dedicated to working with local communities to shift attitudes within tourism to facilitate the return of captive, working elephants to a protected forest habitat.	Based in UK, operates in Thailand
COSTA RICAN ACCESSIBLE TOURISM NETWORK This nonprofit organization was created to build accessible destinations throughout Costa Rica for all through three main pillars: inform, educate and verify.	Costa Rica
KHWELA YOUTH TOURISM STARS Khwela Tourism Stars focuses on empowering young, unemployed women in South Africa. The program intertwines theory and practice through experiential and peer-to- peer learning, self-development and soft skills coaching. The project was established to bridge the gap between unemployed youth in South Africa and tourism companies that struggle to find well-trained and enthusiastic staff.	South Africa
THE NATURE CONSERVANCY The Nature Conservancy works with local partners to enlist tourists as coral gardeners to restore degraded dive sites, develop new dive locations and disperse tourism away from the few remaining healthy reefs that receive the bulk of diver traffic.	USA
INNOVATION LIGHTHOUSE This project tests existing innovations (smart showers, lights, air quality), both technical and behavioral, in a real-life test hotel room with real guests from all over the world, measuring the environmental, social and economic impacts of the innovations.	The Netherlands
REFLOW This project conducts research and testing to produce high quality 3D printing filaments directly from contaminated ocean waste, in collaboration with nonprofits focusing on ocean cleanup, biodiversity and conservation.	The Netherlands



community engagement Booking Booster

Supports innovation through an accelerator program for sustainable tourism startups that are ready to scale.

The three-week program, which was in its third year in 2019, consisted of a series of lectures, hands-on workshops and coaching sessions led entirely by Booking.com employees and experts. The program culminated in a final pitch by the startups to receive grants from Booking.com's €2 million (\$2.2 million) Booking Booster fund in order to support it's next stage of growth.

2019 Booking Booster Winners

OKRA SOLAR, Australia, operating in Cambodia

IMPULSE TRAVEL, Colombia

NOTONMAP, India

AVY, The Netherlands

SASANE SISTERHOOD TREKKING AND TRAVEL, Nepal

PICHA EATS, Malaysia

CLEAN TRAVEL, Australia

HYDRAO, France

I LIKE LOCAL, The Netherlands, operating in Kenya

SUMBA HOSPITALITY FOUNDATION, Indonesia



COMMUNITY ENGAGEMENTS Booking Volunteers

Enlists employees to give back both to the destinations customers visit, as well as to the communities where our people work and live.

Booking Volunteers by the Numbers

34,742+

5,995+

507



COMMUNITY ENGAGEMENT Volunteerism & Corporate Giving

Each brand harnessed the power and the passion of its people to support communities worldwide.

In 2019, Booking.com continued its robust volunteer program, where employees gave their time and expertise to support issues they care about deeply. In addition, the brand's Leadership Team took part in a volunteer day, which encouraged employees to sign up for opportunities to give back.

Agoda launched **CSR Day Off**, a program that gives employees a formal avenue to request and take paid time to volunteer. Throughout the year, 548 employees participated in CSR Day Off, which accounted for 4,384 volunteer hours.

Priceline relaunched its volunteer program, **Priceline LIFT**, which included three paid days off for employees to volunteer their time. Through Priceline LIFT, 348 employees volunteered their time, and the business supported 28 local nonprofit organizations in Connecticut, New York and Mumbai.

Priceline also hosted its first volunteer service week, LIFTOFF. During that week, close to 450 employees representing every Priceline office gave back to communities through serving meals, donating blood and volunteering through other service programs. A total of 2,950 volunteer service hours were logged during this week. Priceline also held its annual food bank drive, which generated close to \$70,000 in support for local pantries. The business also delivered \$75,000 in donations for and support of Wiliam Shatner's Charity Horse Show, which funds over 15 foundations.

For the third year in a row, OpenTable employees were able to donate their OpenTable dining points to No Kid Hungry, which provides food to children facing hunger in the U.S. during the winter holiday season. In 2019, they donated a total of 2.37 million meals. The OpenTable team members also supported Rise Against Hunger's mission to end hunger by packing more than 60,000 meals to provide food and life-changing aid to the world's most vulnerable. Overall in 2019, 930 KAYAK and OpenTable employees volunteered for 26 projects, which accounted for 2,500 volunteer hours.

COMMUNITY ENGAGEMENT SPOTLIGHT



Agoda partners with the Asia-Pacific Development Center on Disability (APCD)

APCD is a regional center that works to empower and support people with disabilities through enabling them to make their own living and become active members of the community. APCD is comprised of a hotel training school, café and bakery, where participants with disabilities can develop hospitality skills, such as making beverages and baked goods.

As part of Agoda's CSR initiatives, the business partnered with APCD to host a one-day pop-up café run by people with disabilities in the Agoda Bangkok office to support the foundation and help with fundraising. Agoda staff were able to purchase beverages, baked goods and limited-edition Agodabranded chocolate bars to support APCD. More than 400 Agoda employees participated in the event and had the chance to connect and learn new skills. For example, in preparation for the event, many Agodans learned some sign language to order coffee and talk with the people running the café.

Environment

Protecting our Natural Resources

There is only one earth. As a company that encourages people to experience the unique places the world has to offer, we are acutely aware that we must model environmental stewardship and responsibility at every turn — starting with our own business. Across the world, our brands are focused on conserving energy, reducing water consumption and decreasing waste, as we have identified these topics to potentially bear the largest risk of our brands having a negative impact on the environment. In 2019, Agoda donated to the World Wide Fund for Nature International (WWF) to plant 6,000 trees in Northern Thailand as part of a test to involve partners in carbon offsetting.

In 2019, Booking.com partnered with World Animal Protection, an international nonprofit animal welfare organization, to launch a set of guiding principles for our partners to ensure the physical and mental well-being of animals impacted by tourism.





ENVIRONMENT

Energy Use & Emissions

As an Internet company that provides online travel and related services in more than 230 countries and territories around the world and powered by 17 major data centers, we focus on mitigating the environmental impact of our businesses through decreasing energy use and emissions.

In 2019, KAYAK and OpenTable employees founded the Global Green Team, which is now part of their combined CSR program, Do Good, with the goal of reducing the carbon footprint at work and aligning green practices across offices. Among other initiatives, the Green Team led concerted efforts to turn off laptops and screens at the end of the workday and to increase timed lighting to reduce energy use. Meanwhile, Booking.com conducted an environmental analysis using measured CO2 calculations, setting up a framework for how the brand can achieve reductions in future years from its offices and business travel.



environment Water Use

Our highest source of water consumption comes from our data centers, and because we lease all of these centers, we do not have access to data on water use. However, we are reducing our water usage when possible across our offices. At KAYAK and OpenTable, for example, offices in Berlin, Massachusetts and Hong Kong introduced water-saving faucet control systems. In 2019, Priceline completed the second phase of an automatic restroom faucet project, which conserves resources by decreasing the amount of time water is dispensed and saves energy by controlling hot water.

Waste

The majority of waste impact is related to standard office operations, where waste is managed independently in accordance with regulations in each country of operations. At KAYAK and OpenTable, each office has an e-waste bin where IT employees place broken items like keyboards. For broken or reusable equipment such as laptops, some offices participate in an employee buy-back program. As part of the Booking Sustainability Team's efforts, Booking.com is working to remove singleuse plastics in all offices in 2020.

Annual Performance Data

We lease our office spaces and data centers, and are therefore 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. Consistent with our efforts to better understand and reduce our environmental impact, we are working to gain access to more actual consumption data for each of our facilities.*

2019 Modeled Emissions and Energy Consumption Data

2019 ENERGY USE

TOTAL ENERGY CONSUMPTION (MWh)

189,713

2019 GHG EMISSIONS BY SOURCE

(METRIC TONS CO2e)

DATA CENTERS

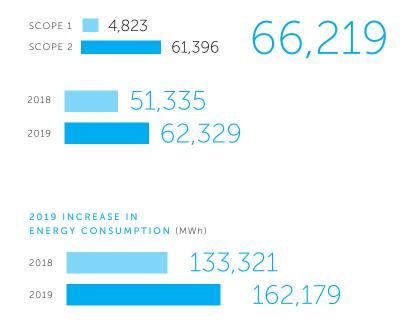
OFFICES

35,456

30,763

2019 GHG EMISSIONS

TOTAL SCOPE 1 & 2 (METRIC TONS CO2e)



Across our offices, we engage with property managers to implement energy efficiency programs and incentives. Meanwhile our largest business, Booking.com, continued to develop a new building in Amsterdam to serve as its future headquarters. This will be the first building owned by Booking Holdings, which will give us more direct control over our energy efficiency initiatives at that location. Our goal is for the building to be accredited with a Building Research Establishment Environmental Assessment Method (BREEAM) excellence certificate.

*Booking Holding's initial emissions estimate for 2019 used standard energy use intensity (EUI) benchmarks to estimate a portion of emissions. 2019 emissions have since been restated, using more accurate EUIs based on actual data. In addition, 2017 and 2018 emissions were restated using updated emissions factors released in 2019 and 2020. Both changes are standard practice, referred to in GHG Protocol parlance as a Change in Methodology.





With a global footprint and more than 26,000 employees representing more than 150 nationalities, diversity and inclusivity are values embedded at the very core of our business and the risk of discrimination and non-inclusion is something we act strongly against.

In 2019, Booking Holdings was ranked by Forbes as a Best Employer for Diversity, and Booking.com was ranked No. 1 on the *Financial Times'* workplace diversity and inclusion list for European employers.

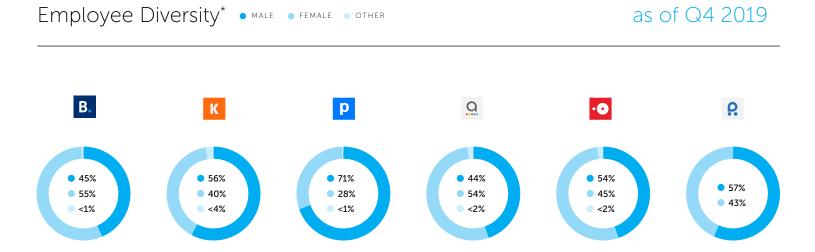


EMPLOYEES Diversity & Inclusion

Across the brands, we continued efforts to create welcoming workplaces. In 2019, Booking.com's LGBTQ+ Employee Network Group, B.Proud, won the award for Most Engaged Network by the Workplace Pride Foundation, which singles out individuals and organizations who commit their time and effort to create safe and inclusive workplaces for LGBTQ+ people. In addition, Booking.com managers have completed diversity and inclusion training. Additionally, Booking Holdings and all of its brands participated in WorldPride NYC 2019, with approximately 300 employees and their guests in attendance.

KAYAK and OpenTable reviewed and updated job descriptions in an effort to eliminate unintended gender bias, hired a new head of Diversity and Inclusion and participated in industry events such as Women Impact Tech and Wonder Women Tech. At Agoda, all new hires received inclusion training, which was also integrated into new manager training programs. Throughout the year, Agoda also conducted recruitment interview bias training and took measures to increase outreach to more diverse candidate pools, including local campus recruitment efforts focused on women in tech in Thailand, as well as at the ROMBA Conference, the world's largest gathering of LGBTQ+ business students and alumni.

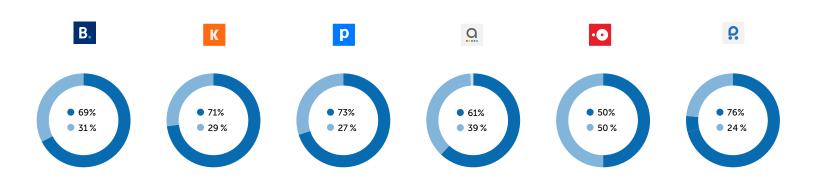
In 2019, Priceline provided inclusive leadership training to all people leaders in the organization. Priceline also introduced behavioral-based interviews to ensure a more objective approach to selection.



* Please note percentages were rounded to maintain consistency and as a result, may not total 100 percent. Due to global privacy laws, the majority of this data is self-reported.

Executive Diversity • MALE • FEMALE • OTHER

as of Q4 2019

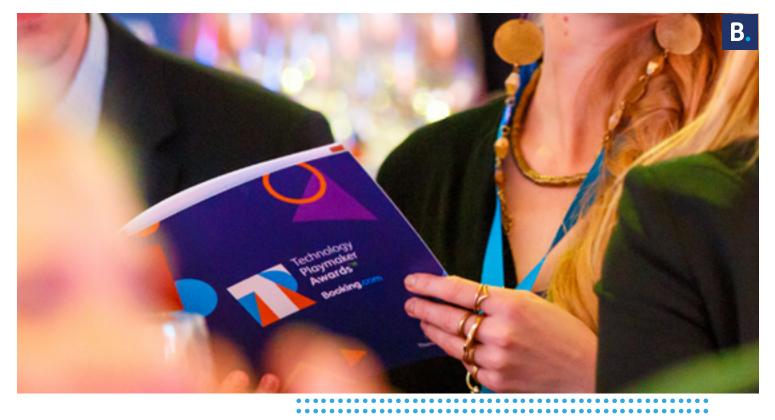


EMPLOYEES Supporting an Inclusive Tech Sector

In the technology industry, many populations remain underrepresented. In addition to evolving our own work culture, we strive to create a more inclusive industry by championing those whose contributions too often go unrecognized and supporting training that brings more people into the fold. Here are a few examples:

B.	For the third year, Booking.com's Women in Tech Mentor Program at the Web Summit attracted hundreds of women in the tech industry to learn from, network with and get mentored by female leaders in tech.
Β.	Booking.com provided scholarships worth €500,000 (\$551,000) to female undergraduate and postgraduate students attending Spelman College and Cornell University in the U.S., as well as Thapar Institute of Engineering & Technology and the Indian Institute of Science in India to bring more women into key tech programs.
B.	Booking.com launched a code-a-thon in the U.S., inviting young women ages 16-19 who are interested in tech, to San Francisco to participate in a two-day technology immersion session.
Β.	Booking.com's 2019 Technology Playmaker Awards recognized women who are making a difference in the technology sector. The awards have nine categories. In 2019, the nominations increased 53 percent and came from more than 60 countries.
?	Rentalcars.com partnered with Tech Returners, an independent charity based in Manchester, England, that provides support and services for both individuals and businesses working within the tech sector. Through this partnership, Rentalcars.com funded a 15-week course for candidates who are returning to work and interested in developing a career in tech.
K	KAYAK and OpenTable supported many events that promoted women in tech, such as conferences from Women Impact Tech and Wonder Women Tech.
р	Priceline formed a relationship with PowerToFly, a large consortium of women in technology.
B.	33% - Four members of the Booking Holdings board of directors are women.

EMPLOYEE SPOTLIGHT



Booking.com's Technology Playmaker of the Year 2019, Linda Liukas:

Linda Liukas is the author and illustrator of Hello Ruby, a children's picture book series about the whimsical world of computer science that has been translated into 25 languages. She is also the founder of Rails Girls, a global movement in over 300 cities to teach young women to program.

Employee Engagement

Employee Resource Groups (ERGs) provide ways for our employees to stay connected and engaged within a community of others with shared interests across our brands. These groups are driven by passionate employees who work to provide community and visibility, create a culture of diversity and inclusion, and champion diversity-related issues.

ERGs are thriving companywide. In 2019, active groups at Agoda increased by 53 percent from 2018 and spread across seven countries. KAYAK launched its first ERG with QUAK (Queers at KAYAK) and WHAK (Women Here at KAYAK), and OpenTable established a new ERG called POC (People of Color). Priceline employees launched WIP (Women Impacting Priceline), a women's employee resource group for multiple offices, with the hope of expanding to all offices after the success of this pilot.

Booking.com also launched several new ERGs including B.Able (for the neurodiverse, differently abled and their allies) and B.Bold (black/Afro-Caribbean and their allies).





Training & Education

Opportunities for professional development are critical to engaging our employees. Booking Holdings' Women in Leadership Program, for directors and vice presidents across all brands, focused on training to further develop the next generation of C-suite leaders. By the end of 2019 more than 150 women had participated.

Our brands also made progress implementing new tools to make learning easier and more accessible. Booking.com launched a new learning portal and improved tools for manager development and also provided additional avenues for growth, including a leadership program promoting diverse talent development.

In 2019, KAYAK and OpenTable invested additional resources to further their learning and talent development efforts. In 2019, they initiated a number of learning programs, conducted leadership workshops with middle management and used assessments for upward feedback and coaching purposes. In addition, they instituted a program for new managers that focused on teaching best practices from top leaders. Overall in 2019, 280 managers received training totaling 2,240 hours.

Priceline also expanded its use of professional coaching, increased online learning offerings and developed competency frameworks for software developers, design specialists and project managers. In 2019, Priceline employees had an average of 24 hours of training, with 100 percent receiving regular performance and career development reviews.

Employee Well-Being

As a collective organization, we work to foster an environment that uplifts the physical and emotional health of our employees.

In 2019, Booking.com built and launched its employee well-being portal, B.Well @ Booking, which includes tools and resources covering the areas of social, mental, physical and emotional health. The brand also sponsored Global Wellbeing Week, during which employees from 167 offices actively participated in health and well-being talks and workshops.

Booking.com also rolled out a new Employee Assistance Program (EAP) to all locations globally, offering a wide range of confidential support services to assist employees and their families with challenges and issues related to mental, social or financial health. The brand also completed a seven-week pilot, giving 3,000 employees access to wellbeing apps related to mindfulness and meditation, sleep improvement and sustainable habit change.

Priceline continued to offer programs that encourage healthy behaviors, such as rebates for annual physicals, biometric screening, on-site flu shots, fitness reimbursement, wellness speakers and wellness fairs. Also in 2019, Agoda expanded its EAP to 100 percent of its global employees.



Employee Benefits

At a minimum, we follow legally mandated policies for health care benefits, which vary widely from country to country, and we perform regular benchmarking of benefits and wages to ensure that they remain competitive and comply with local laws and regulations. In 2019, we implemented or enhanced a number of employee benefits, including:

K

р

KAYAK and OpenTable enhanced parental leave globally and offered a low-cost employee and child coverage level for all health insurance plans.

- Rentalcars.com increased holiday allowance after three years, launched financial well-being days where experts offer seminars and enhanced maternity benefits and its pension benefits.
 - Priceline introduced the Big Deal Bucks program, which provided each employee an annual allowance to use toward personal travel on Priceline.com.



Ethics & Integrity

Ethical business practices continue to unite our brands around the world. Our commitment to integrity is an indispensable part of who we are at Booking Holdings and is firmly woven into our culture through our group wide value of "absolute integrity." This value is the foundation of our global Compliance & Ethics program.

We are dedicated to maintaining an effective program and striving for continuous improvement across all program elements to mitigate the risk of our employees contributing to unethical business practices, including those related to corruption and human rights misconduct. This starts with a high-engagement Code of Conduct and clear, actionable Compliance & Ethics policies. The Code forms the backbone of our program and summarizes the legal, ethical and regulatory requirements and policies that govern our global business in several important areas, including antibribery and corruption, fair competition and antitrust, privacy and data security, antiharassment and discrimination, human rights, conflicts of interest, reporting and investigation, and nonretaliation.

Across our brands, we have introduced specific initiatives to help embed a culture of integrity. For example, in 2019 all brands launched Ethics Moments: manager-led live training sessions designed to foster an ethical tone in the middle by allowing teams to stop, think and talk about the real-life application of compliance and ethics topics together as a team. In 2019, the program saw success across all brands and will continue to be rolled out to deeper levels of the organization in 2020.

In 2019, we also launched the "Your Voice: Ethical Culture Survey" across all brands. We view this biennial survey as a valuable opportunity for us to gauge the perceptions of our employees when it comes to a culture of compliance and ethics, to measure the effectiveness of our efforts to reach our employees with compliance and ethics messaging, and to benchmark how we are doing against other organizations. In 2020 we are using the results of the survey to help us advance our program in specific areas in the spirit of continuous improvement.

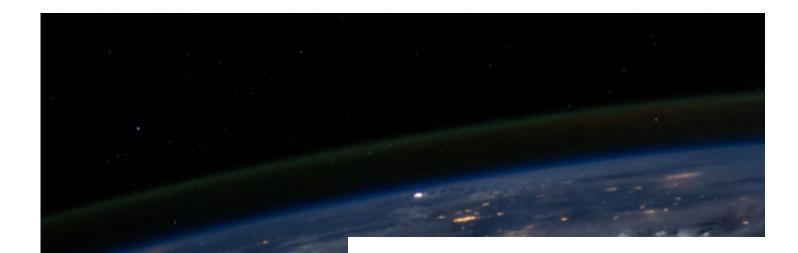


ETHICS & INTEGRITY (CONT.)

Our Ethics Ambassadors are an important part of our program, serving as extensions of the Compliance & Ethics department. They help us bridge the gaps between employees and Compliance & Ethics by assisting in promoting awareness and fostering discussions of our Code, the Compliance Helpline, our policies, our business principles and our values.

We believe transparency is key to fostering our value of absolute integrity, and as a result, we publish the Compliance Transparency Report each year. This initiative provides employees with qualitative and quantitative data collected throughout the year through internal compliance reporting. The report is designed to help instill trust in the Compliance & Ethics function, improve the perception of organizational justice at all levels and promote a "speak up" culture in which employees feel safe in raising compliance and ethics concerns without fear of retaliation.

Finally, because we are focused on measurement, monitoring and accountability, we have adopted compliance and ethics standards and key performance indicators (KPIs) for all brands. The standards outline all elements and requirements of our program, and the KPIs are in place to measure and hold ourselves accountable for achieving program progress and deliverables. Achievement of the KPIs is a specific annual performance goal of our corporate CEO and each of the brand CEOs, which helps drive responsibility and accountability for compliance and ethics at the highest levels. Brand compliance teams create and maintain annual plans to ensure that they will successfully achieve the KPIs. We review and update the KPIs each year as a way of ensuring that we are always focused on maturing our program and taking it to the next level.



Customer Privacy & Data Protection

Privacy and security are a vital part of our responsibility to our customers.

We work to preserve our customers' ability to manage their data and make informed choices about how we use their data. We support critical efforts to secure our network against new and emerging threats. All of our brands are committed to operating according to our Code of Conduct, within which we set out core privacy principles including commitments to transparency to customers, purpose limitation, honoring customer choice, security of personal information, honoring individual rights and holding ourselves accountable to these commitments.





customer privacy & data protection Privacy and Data

Our privacy and security teams help us protect our customers' data and develop practical ways to manage personal information through training, technology, security and policies. Our privacy program across the brands has set out policies and governance, so our customers know that they can trust how we collect, use and protect their personal information. In 2020, all employees at all brands will receive mandatory training on privacy and data protection, and more specific role-based training will be given where appropriate.

We continue to build on our privacy program efforts with updates to our privacy practices, as with our compliance efforts around the EU General Data Protection Regulation and the California Consumer Privacy Act in the U.S. We monitor our efforts through assessments done by compliance, internal audit, risk and controls teams, and outside counsel to ensure the oversight and evolution of our privacy practices.



Governance

We have governance practices and policies in place to ensure that our business conduct and performance aligns with the interests and expectations of stockholders and other stakeholders.



GOVERNANCE Ensuring Accountability

The Board of Directors provides oversight and counsel to management and represents the interests of stockholders. The board as of December 31, 2019, was composed of 13 members, 11 of whom are independent directors, including an independent lead director. Of these 13 members, five are women (38 percent) and two are people of color (15 percent). There are three board committees: Audit, Compensation and Nominating, and Corporate Governance. Only independent directors serve on the committees. For more information about our corporate governance policies and practices, see the "For Investors" tab on our corporate website www.bookingholdings.com.

