

BOOKING HOLDINGS



Code of Conduct





“Each one of us, starting with me, is personally responsible for adhering to the Code. It applies to us all, and it applies at all times.”

OUR CODE, OUR COMMITMENT

To our worldwide team,

We collectively lead an incredible global business that touches the lives of millions of people every day. Our mission is to **Make It Easier for Everyone to Experience the World**, but it will mean nothing if we don't accomplish it with purpose and by staying true to our values.

Our values are the principles that give us purpose. Through our commitment to building a diverse and inclusive culture, we live our value of *Diversity Gives Us Strength*. We're proud to employ people in over 70 countries across our many brands, and believe this diversity is a major part of what makes our Company and brands unique. We are committed to listening, learning, and creating a work environment that is free from prejudice and discrimination. **This is all part of our collective commitment to our value of *Absolute Integrity* — the bond that unites us and which is woven into everything we do.** It is embodied not only in our values, but also our Code, which demands that we own our actions and decisions.

Our Code is not just guidance on our legal and ethical standards. It is a compact, an agreement between you, me and our community. Our Code tells you what you can expect of the Company and your colleagues, and it tells you what the Company, your colleagues and I expect of you.

Each one of us, starting with me, is personally responsible for adhering to the Code. It applies to us all, and it applies at all times.

I ask you to read it carefully to ensure that you understand what I am asking of you as an employee. If you ever have questions about our commitment to the Code, don't hesitate to ask your manager, Compliance Officer, an Ethics Ambassador or even me.

It is critically important to me that if you see something that is not right, or if you have questions, you will **speak up**. We pledge to provide you with a safe environment that supports trust and transparency. We do not tolerate retaliation against anyone who raises a concern in good faith.

Thank you for your dedication, hard work and continued commitment to fostering a high-integrity culture and living up to our motto and tagline: *The Right Results, The Right Way*.

Glenn Fogel

President and Chief Executive Officer

OUR VALUES



EXPERIENCES OF EVERY KIND, FOR EVERYONE.

We believe that by making it easier for everyone to experience the world, we are doing our part to make humanity better.



RELENTLESS INNOVATION.

We should never feel satisfied with the status quo, and every day should begin with the question – how are we going to innovate today?



DIVERSITY GIVES US STRENGTH.

We are absolutely committed to diverse ideas, people and experiences.



ABSOLUTE INTEGRITY.

We will always strive to do the right thing and achieve success with integrity and accountability.



THE SUM IS GREATER THAN OUR PARTS.

Our strength lies in our people, and our success is contingent upon our ability to work as one team to succeed in our mission to make it easier for everyone to experience the world.

THE RIGHT RESULTS THE RIGHT WAY

Booking Holdings is the world's leading provider of online travel and related services, provided to consumers and local partners in more than 220+ countries and territories through six primary consumer-facing brands: Booking.com, Priceline, Agoda, Rentalcars.com, KAYAK 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.



TABLE OF CONTENTS

Introduction	5
Reporting and Investigation.....	9
Workplace Respect	13
Environmental, Social & Governance (ESG)	17
Anti-Bribery and Corruption	21
Financial Integrity and Reporting.....	24
Gifts and Conflicts of Interest	29
Fair Competition and Antitrust	34
International Trade	36
Insider Trading	38
Privacy and Data Security	40
Protection of Company Assets	42
Fair Dealing.....	45
Social Media and Public Communications	47
Conclusion.....	49

Note about the photo selections in the Code: The selected break page photos were chosen because they feature people experiencing just some of the awe-inspiring locations in which we facilitate accommodations, flights, restaurant reservations and rental cars.

A woman with a red backpack is looking up at a vibrant market stall in Fez, Morocco. The stall is filled with colorful textiles, including a large striped rug and various hanging fabrics. The scene is bustling with activity, and the woman appears to be exploring the market.

INTRODUCTION

*Discovering all the colors, patterns, smells, sights and stories here in Fez.
#bazaarmorocco #marketplacefinds*

FEZ, MOROCCO

THE PURPOSE OF OUR CODE OF CONDUCT

We are committed to conducting business ethically, legally and in a manner consistently reflective of our tagline of achieving *The Right Results, The Right Way*.

This Code of Conduct (the “Code”) summarizes the legal, ethical and regulatory requirements and policies that govern our global business in several important areas. Likewise, this Code contains information on how to report possible violations or obtain additional guidance when needed.

The Code is not intended to cover every issue or situation you may face. Instead, it is meant to be a guide in conjunction with the Company’s more detailed [Policies](#) and your [Employee Handbook](#). If you are ever unsure how to handle a specific situation, **ask before acting** and speak with your manager or one of the resources described in this Code.

THE SCOPE OF OUR CODE

It is important that you read the Code and abide by its principles. Our Code applies to every person working with, for or on behalf of any of Booking Holdings’ brand companies. This includes Booking.com, KAYAK, Priceline, Agoda, OpenTable and each of their subsidiaries (as each may be individually and collectively referred to as the “Company” or “Booking Holdings”). All directors, officers and employees of the Company, wherever they are located, are expected to be familiar with the Code and to adhere to the applicable principles and procedures that it sets forth.

OUR OBLIGATIONS

We are a global company committed to operating in compliance with all applicable laws in every country where we do business. Achieving results through illegal or unethical means is unacceptable. **We expect you not to do anything to compromise our commitment to integrity—we would rather lose business than gain it improperly.**

The Board of Directors has adopted this Code to ensure:

- Honest and ethical conduct, including fair dealing and the ethical handling of conflicts of interest
- Compliance with applicable laws and governmental rules and regulations
- The deterrence of wrongdoing



THE RIGHT RESULTS THE RIGHT WAY



WHICH LAW APPLIES?

We conduct business in more than 220 countries and territories around the world. As a result, our operations are subject to the laws of many countries, provinces, states and municipalities, and organizations such as the European Union.

The cross-border nature of e-commerce poses important challenges for understanding how these laws may apply to our operations and business. The references in this Code and in other policies, as well as the laws in the United States and the other countries where we do business, reflect the reality that we are truly a global company regulated by many different laws at the same time. In some instances, there may be a conflict between the applicable laws of two or more countries. When you encounter or suspect such a conflict, it is especially important that you consult with your Compliance & Ethics Officer or your Legal Department for guidance.

RESPONDING TO GOVERNMENT INQUIRIES

We occasionally receive inquiries from governmental agencies responsible for enforcing the law. **We will respond truthfully, promptly and accurately to appropriate and legitimate government requests for information in the spirit of cooperation and transparency.** If you are contacted by a government agency, it is important that you immediately contact your Compliance Officer or Legal Department.

Your brand company may have specific policies relating to site visits, [dawn raids](#) or requests for information from a government agency. Be sure to know and understand these policies.



THE RIGHT RESULTS THE RIGHT WAY

Our ethical obligations as employees are to:

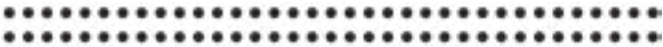
- Know the principles of the Code
- Make decisions consistent with the Code
- Be aware of, and comply with, the laws and regulations of the jurisdiction(s) where we/you do business
- [Report](#) any violations or acts that are not consistent with the Code

If you are unsure, **ask before acting!**

...and please always complete your online and in-person compliance trainings in a timely manner! They are an important part of our commitment to getting *The Right Results, The Right Way*.

Managers have additional responsibilities to:

- Promote compliance with the Code among your direct reports, both by example and by direction
- Foster, engender and reward a culture of accountability and integrity
- Monitor your subordinates' compliance with the Code
- Enforce the Code consistently
- Ensure that appropriate compliance controls are both implemented and operating in your department or team
- Encourage employees to [report](#) issues in good faith
- Ensure that the Company's zero-tolerance stance prohibiting retaliation against whistleblowers who [report](#) in good faith is observed and strictly enforced



REPORTING AND INVESTIGATION

Making new friends! #discoveregypt #vagabondlife

GIZA, EYGPT



REPORTING AND INVESTIGATION

If you become aware of anything that violates, or appears to violate, this Code or any applicable law, regulation or Company policy, you have a responsibility to immediately [report](#) the issue.

Even if you do not have all the details, prompt reporting is critical so that the appropriate personnel can investigate the issue, uncover the facts, and determine whether a violation actually occurred. Not only does swift reporting help to prevent any further violations, but it also helps to preserve evidence and safeguard our employees, officers, directors and the Company against any further wrongdoing. As long as you reasonably believe that a violation occurred, you are doing the right thing. **We have a zero-tolerance stance prohibiting retaliation against whistleblowers who [report](#) in good faith.**

Making a claim in “good faith” means having an honest and sincere belief concerning the matter alleged.

We have established a number of ways to [report](#) issues so that you can select whatever avenue is most comfortable for you. No matter which option you select, your issue will be treated with sensitivity and seriousness. In addition, the Company will endeavor to treat all reports with the same degree of confidentiality and protection as the situation permits and/or as consistent with applicable law.

Regardless of where you are located, if you have concerns relating to accounting, internal controls, auditing matters, financial record keeping, banking or financial crimes, bribery and corruption, or antitrust and competition, you may directly notify the Global Compliance & Ethics Officer or the Internal Audit Department, using the Compliance [Helpline: \[BKNGHelpline.com\]\(https://bknghelpline.com\)](#), notify the Audit Committee of Booking Holdings’ Board of Directors or anyone with whom you feel comfortable who will escalate the issue on your behalf. If you wish to make a complaint to the Audit Committee, please refer to the [Audit Committee Complaint Handling Procedures](#).

RESOURCES

If you have a question about the Code or wish to [report](#) a business conduct concern, you can contact any of the following resources:

- Your manager or supervisor
- Your local Human Resources representative(s)
- Your local Legal Department
- Your local Compliance & Ethics Officer
- The Global Compliance & Ethics Officer
- The Chief Legal Officer
- The Compliance Helpline: bknghelpline.com



THE COMPLIANCE HELPLINE

The Compliance Helpline is a web-based and telephone-enabled, secure and independent resource for raising concerns of wrongdoing or ethical misconduct.



Our Compliance Helpline offers:

- Confidential reporting and the choice to remain anonymous
- Telephone (toll-free) and web-based reporting options in 12 languages
- 24-hour/7-days-a-week access
- Ability to follow up on your concern, even if you choose to remain anonymous

Where local law permits, you have the ability to [report](#) your concerns anonymously through the Compliance Helpline. However, please keep in mind that in some circumstances, it may be difficult or impossible for the Company to thoroughly investigate reports that are made anonymously. Therefore, we encourage you to share your identity and assure you that the Company will endeavor to treat reports with the same degree of confidentiality as the situation permits and/or as consistent with applicable law.

WHAT HAPPENS AFTER I REPORT AN ISSUE?

We take reports of actual or suspected misconduct seriously. When issues are reported to the Company, we respond promptly and confidentially.

We evaluate each report to determine the appropriate resolution strategy. If an investigation is needed, we conduct our inquiries in a confidential, thorough and objective manner. Each employee is obligated to cooperate with a company investigation and assist in its inquiries.



If the Company determines that misconduct has occurred, we will take appropriate disciplinary and preventive action, up to and including termination. In the event of criminal or other serious violations of law, the Company may also notify the appropriate governmental authorities. In addition, the Global Compliance & Ethics Officer periodically reports all significant Code investigations and final decisions, including disciplinary actions taken, to senior management and the Audit Committee of the Board of Directors.

RESOURCES

Our Ethics Ambassadors are fellow employees who help create awareness regarding ethics and compliance issues, promote our Code, our policies and our values, and serve as a resource for those who want to learn more about compliance and ethics at the Company.

Our Ethics Ambassadors can provide guidance on how to ask questions and report any concerns, should you decide to use the reporting resources detailed in this Code.

If you are interested in becoming an Ethics Ambassador in your location or department, speak with your brand company Compliance Officer to learn more about the program and to see if you qualify.

OUR NON-RETALIATION STANCE

Employees who report concerns of wrongdoing perform an important service to the Company, and the Company will not tolerate retaliation in the form of an adverse employment decision (including separation, termination, demotion, suspension, loss of benefits, threats, harassment or discrimination) against anyone for raising concerns in good faith.



Every brand company will act to protect good-faith reporters from retaliation, and will take appropriate disciplinary action against anyone who retaliates against them. Conversely, any bad-faith reporting could lead to disciplinary action, up to and including dismissal.

Making a claim in "good faith" means having an honest and sincere belief concerning the matter alleged.



WORKPLACE RESPECT

"I may not have gone where I intended to go, but I think I have ended up where I intended to be."
#roadtrippin #letsgopeakdistrict #getaway

DIVING THE PEAK DISTRICT NATIONAL PARK, ENGLAND

DIVERSITY AND INCLUSION

Our people are our greatest asset and strength, and we value every employee for their contributions to our success. We have operations in more than 70 countries, so, in keeping with the global nature of our Company and business, we seek to work in a way that is consistent with local cultures and business customs, as long as they do not conflict with this Code and applicable legal requirements.

The diversity of our workforce contributes to our success through unique ideas, viewpoints, talents and values. We firmly believe in a work environment where all individuals have equal opportunities and are treated with respect and dignity.

Employment is based upon individuals' abilities to contribute to our success by sharing their unique blend of ideas, viewpoints, talents, and values. Recognizing that our employees have diverse experiences and backgrounds, we seek to create an equally diverse and global workforce, and we expect our employees to embrace norms that support an inclusive culture, workplace and society. The Company supports and abides by all laws and regulations that govern our employment practices, and we prohibit unlawful discrimination of any type.

The diversity of our workforce contributes to our success through unique ideas, viewpoints, talents and values. We firmly believe in a work environment where all individuals have equal opportunities and are treated with respect and dignity.

THE RIGHT RESULTS THE RIGHT WAY

We do not unlawfully discriminate. We evaluate all employees and prospective employees on their merits and qualifications and never on individual characteristics, such as:

- Race
- Color
- Religion
- Sex
- Sexual orientation
- Gender, gender identity, gender expression
- National origin
- Age
- Marital status
- Pregnancy, childbirth and related medical conditions
- Disability
- Military service, military affiliation and veteran status
- Any characteristics that may be protected by our Company policy or the law

WORKPLACE CONDUCT, HARASSMENT AND BULLYING

All of our employees all have the right to work in an environment where they are respected, safe and secure. We expect all employees to respect this right and to act professionally. We do not tolerate the use of insulting, hurtful, threatening or abusive comments. All employees should be aware of and respect the diversity of viewpoints, beliefs and values of all of our colleagues and should refrain from expressing or forwarding opinions about sensitive topics, such as politics or religion, that do not relate to the workplace, that negatively affect the workplace or that interfere with the ability of you or your colleagues to do your jobs.

The Company prohibits any threats, bullying or unlawful harassment of any type, including emotional, physical or sexual harassment.

Sexual harassment includes unwelcome sexual advances, unsolicited sexual attention, demands or requests for sexual favors, sexual innuendo or other unwelcome verbal or physical conduct of a sexual nature. Sexual harassment can be directed at anyone, regardless of their gender, gender identification, sexual orientation or any other individual or personal characteristics.

Sexual harassment includes unwelcome sexual advances, unsolicited sexual attention, demands or requests for sexual favors, sexual innuendo or other unwelcome verbal or physical conduct of a sexual nature.

If you feel that you have been harassed or discriminated against or if you observe such behavior, you should immediately contact your local manager, a member of the Compliance & Ethics Department or a local Human Resources representative so that the Company can take prompt and corrective action. Remember that we will not tolerate any retaliation taken against anyone who raises a harassment or discrimination concern or complaint in good faith. For more information on this topic, please refer to your [Employee Handbook](#).

Respect for employees includes our commitment to a safe workplace that is free of both human and environmental hazards. If you ever have concerns for your health or safety at work, please contact your manager immediately.

THE RIGHT RESULTS THE RIGHT WAY

Treat others with respect, dignity and courtesy. Actions that may be considered harassment include:

- Offensive or inappropriate comments or jokes for the workplace
- Bullying
- Unwelcome physical contact or gestures
- Creating a hostile or intimidating work environment, including one in which employees may be driven to engage in inappropriate work practices to “fit in”
- Verbal or physical threats of any kind
- Explicit, derogatory pictures or text inappropriate for the workplace
- Sexual advances or requests for sexual favors
- Racial or ethnic slurs

TAKE NOTE:

We define “harassment” as any form of unwanted verbal, non-verbal or physical conduct that occurs with the purpose or effect of violating the dignity of a person, in particular when it creates an intimidating, hostile, degrading, humiliating or offensive environment.

“Workplace bullying” means offensive behavior through vindictive, cruel, malicious or humiliating attempts to undermine an individual or groups of employees.

OTHER CONDUCT THAT HARMS LEGITIMATE BUSINESS INTERESTS

Because we respect our employees' right to privacy, we usually do not take an interest in what anyone does outside of work and on their own time, unless it rises to a level that impairs their ability to perform their job, negatively impacts the workplace, or threatens our reputation and other legitimate business interests.

Issues or problems in this area often arise involving social media. Of course you're free to say and do what you want on social media, on your own time and your own equipment, but please be aware that the Company reserves the right to take action if your actions or conduct negatively impacts the Company, our workplace, our reputation, or your ability to perform your job.

If you have any questions in this area, please refer to our Social Media Policy, speak to your manager, your Compliance & Ethics Officer and/or HR Leader.

WORKPLACE SAFETY

We do not tolerate the misuse of drugs or alcohol. Working under the influence of drugs or alcohol or abusing prescription drugs may create unsafe working conditions for you and for those around you. Employees who have concerns that a colleague may be misusing drugs or alcohol within the scope of their job, or who witness such misuse, should contact their manager or a Human Resources representative. Please also consult your brand's Drugs and Alcohol Policy or [Employee Handbook](#) for further guidance.

We forbid all acts of violence and threatening behavior in the workplace. The possession of weapons, including knives and firearms, is prohibited on Company property. If the Company determines that an employee has acted violently or behaved in a threatening or inappropriate manner, appropriate disciplinary action will be taken, and appropriate law enforcement agencies may be contacted.

We all must also be familiar with and abide by all the requirements of any crisis management or business continuity plans and be prepared to adapt to changing circumstances regarding our workplace and working conditions.

Immediately [report](#) any behavior or activity that jeopardizes the health and safety of employees or the workplace to your local manager.

If you feel that you or someone else is in immediate danger, you should call the local authorities or emergency services.

A scenic view of a glacier in Alaska. In the foreground, a person's feet wearing brown fur-lined boots are visible, resting on a dark surface. The background shows a large, blue and white glacier flowing between dark, rocky mountains under a blue sky with scattered clouds. The water in the foreground is dark blue with small ice floes.

ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG)

Can't stop being amazed by nature. #neverstopexploring #alaskaadventure

BLOWING KISS TO HOLGATE GLACIER, ALASKA

ENVIRONMENTAL, SOCIAL & GOVERNANCE (ESG)

Booking Holdings is committed to making sure there is a world worth experiencing in the present and the future. Our environmental, social, and governance initiatives, processes and principles demonstrate our continued emphasis on being a sustainable and ethical global business.

SUSTAINABLE OPERATIONS

Running our own operations sustainably is a fundamental pillar of our [sustainability strategy](#). We set high expectations for our travel provider partners and operate our own business according to the same criteria. This includes reducing our operational footprint and managing unavoidable impacts efficiently. We will continue driving our operations toward a net-zero carbon footprint and commit to making an annual reduction in greenhouse gas, waste, and supply-chain emissions. Booking Holdings operates sustainably and responsibly by collaborating and leveraging our experiences within our communities. Using our global reach, we can participate in hundreds of local initiatives and enhance positive impact for our communities at scale.

Booking Holdings gives back to our communities by supporting local initiatives with time, knowledge, and funding. In doing so, we build stronger relationships with communities, engage employees, and inspire travelers to make a positive difference.

Our environmental stewardship is a cornerstone of our ambitions: ensuring the world remains worth experiencing. We continue to prioritize a reduction in energy, greenhouse gas emissions and waste, and to engage with employees on our environmental initiatives.

SUSTAINABLE TRAVEL

[Sustainable travel](#) can empower marginalized communities, broaden horizons, preserve cultural heritage, rejuvenate our travel ecosystem, and make certain the planet, its people, communities, habitats, and wildlife are able to thrive today and into the future. Through product innovation, travel provider partner support and industry collaboration, Booking Holdings and our brands have committed to making sustainable travel easier for millions of customers worldwide.

As a company, Booking Holdings believes that it has a responsibility to help ensure the world remains worth experiencing and to promote a more sustainable travel industry. Booking Holdings is focusing its efforts on two key areas that rely on each other to succeed:

- Supporting the company's partners to become more sustainable, which in turn increases the number of sustainable travel offerings; and
- Supporting the company's customers to make sustainable choices.

HUMAN RIGHTS

We are committed to respecting and promoting human rights wherever we do business. As one of the world's leading online travel companies, we respect the human rights of our stakeholders by seeking to avoid infringing on the rights of others and working to address adverse human rights impacts with which we are involved. Our commitment to respect and promote human rights is based on internationally recognized standards and principles, including the United Nations (UN) Guiding Principles on Business and Human Rights.

We seek to empower people to cut through travel barriers. We believe that travel can bring out the best in humanity by helping people interact and come to better understand different cultures and ways of life. It also provides both economic and social benefits to the communities that travelers visit. We believe these ideals are vitally important and form a powerful purpose, a North Star that we can look upon to inform and guide our actions and decisions in this area. Therefore, while adhering to all applicable laws, on a fundamental level, we feel the greatest and most positive human rights impact we can have is to make it easier for everyone to experience the world. To learn more about our commitment to respect and promote human rights, please see our [Human Rights Statement](#).

We believe that travel can bring out the best in humanity by helping people interact and come to better understand different cultures and ways of life.



GOVERNANCE

Our strong [corporate governance](#) and ethical decision-making help us find the right solutions the right way — for each other, our communities, and the world around us. We embed compliance and ethics in everything we do to allow us to achieve our mission: making it easier for everyone to experience the world.

Booking Holdings' corporate governance practices and policies provide the framework we use to fulfill our duties to stockholders and serve as a good corporate steward. We are committed to operating with integrity, honesty, and accountability and in compliance with applicable regulations.

Our values guide our actions at every level. Our vision is to have a best-in-class compliance and ethics program, characterized by a culture of inclusion and integrity that contributes, measurably, to the sustainable growth of our business and lives up to the company's ubiquitous compliance and ethics tagline — "The Right Results, The Right Way."

Managing cybersecurity, privacy and data protection risk is key among our responsibilities. We invest in the people, processes, and technology for protecting the personal data of our customers, our partners and employees.

TAKING CARE OF OUR PEOPLE

Our employees drive our success and are fundamental in delivering on our mission to make it easier for everyone to experience the world. We strive to create an empowering and inclusive work environment through our continued focus on employee engagement, well-being, diversity and inclusion, talent management, and rewarding and recognizing that talent.

From flexible/hybrid working models to engagement programs, we facilitate activities and policies designed to bring our people together and support our international workforce. While our brands work independently on talent management, we leverage best practices and learn from each other.

Our business mission encourages understanding, acceptance, and a welcoming approach to broaden our horizons, meet new people and cultures, have new experiences, increase our knowledge and grow to appreciate the world in which we live.

The health, safety and well-being of our employees is of the utmost importance. Well-being is more than just mental health, and at Booking Holdings, our inclusive approach recognizes that well-being looks different based on identity and backgrounds.

Booking Holdings is a community of passionate learners, and we maintain a skills-centric and knowledge-sharing culture to encourage lifelong learning. We believe investing in people is a key element in our commitment to social responsibility.

We believe investing in people is a key element in our commitment to social responsibility.

ANTI-BRIBERY AND CORRUPTION

Bring on the lights! #northernlightsiceland #nightsskychasers

NORTHERN LIGHTS, ICELAND

PROHIBITION OF BRIBERY

There is **zero tolerance** for any form of bribery or corruption.

We conduct business around the world and are subject to a number of laws that strictly prohibit offering, providing or authorizing the payment of bribes of any kind. Many of these laws further prohibit your receipt of bribes (or kickbacks) in connection with conducting our business. These laws also prohibit any third parties from bribing others on behalf of the Company. We seek to comply with all applicable international laws, including the US Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act, and we have developed a [Global Anti-Bribery and Corruption Policy](#) to provide you with further guidance about our expectations for all employees and third parties. The following principles, however, should serve as your guide:

GIVING AND OFFERING IMPROPER PAYMENTS: No employee may provide, offer or authorize anything of value to a government official or private party (e.g., vendor, supplier, contractor, client or representative) for the purpose of obtaining or retaining business or gaining influence, favorable treatment or any other advantage for the Company. This includes providing or offering facilitating payments (sometimes called “expediting” or “grease” payments) to secure routine governmental action or expedite official action. While these sorts of payments may have been customary in some places, they are illegal in most countries, and they are always against our policy.

This prohibition extends beyond making payments to government officials and includes making payments to representatives of private commercial enterprises with which we do business.

A “government official” is any person acting in an official capacity on behalf of any foreign government, agency, department, regulatory authority or instrumentality. The term is defined loosely and also includes national, state or local government employees, candidates for political office, political parties, political party officials, employees of government-owned enterprises or state-owned enterprises (including national airlines or government-owned hotels) and employees/representatives of quasi-public or international, non-governmental organizations, such as the United Nations and the Red Cross.

REQUESTING AND RECEIVING IMPROPER PAYMENTS: Company employees are also prohibited from improperly receiving or requesting anything of value from third parties, such as vendors, suppliers, contractors or client representatives. It is prohibited to do so either directly or indirectly.

No employee will be reprimanded for refusing to pay a bribe, regardless of its adverse impact on revenue, sales or other aspects of our business. The cost and damaging ramifications of bribery and corruption far outweigh any perceived short-term benefits.

Violations of anti-bribery laws, including both the FCPA and the UK Bribery Act, are very serious and may result in criminal and civil penalties for the Company, its directors, officers and individual employees. These penalties can include significant fines and jail terms for those involved.

There is zero tolerance for any form of bribery or corruption.

ACCURATE BOOKS AND RECORDS

All employees must record payments and other consideration in their brand company's books, records and accounts in a timely manner and in reasonable detail. No undisclosed or unrecorded accounts may be established for any purpose. False, misleading, incomplete, inaccurate or artificial entries in the books and records are prohibited. Employees may not use personal funds to accomplish what is otherwise prohibited by this and other Company policies.



DEALING WITH THIRD-PARTY AGENTS

Anti-bribery laws prohibit the Company from employing third-party agents to make corrupt payments on our behalf. Anti-bribery laws criminalize such conduct not only where the Company actually knew of such conduct, but also under circumstances where it can be reasonably concluded that the Company knew or should have known that such payments would be made.

It is therefore imperative that each of our third-party agents understands that they are strictly prohibited from paying or receiving any bribes (including facilitating payments) on our behalf. As such, all of the Company's third-party agents who act on our behalf must be vetted, undergo due diligence and be made aware of the Company's expectation that they abide by relevant anti-bribery laws. Please work with your local Compliance & Ethics Officer to ensure that our third-party agents are vetted.

The term "third-party agents" includes any entities or individuals who act on our behalf, including agents (e.g., custom/real estate agents), contractors, consultants, corporate service companies, payroll providers, advertising agencies and law firms.

Due to the complex laws in this area, please refer to the [Global Anti-Bribery and Corruption Policy](#) and/or contact your local Compliance & Ethics Officer with any questions or concerns.



FINANCIAL INTEGRITY AND REPORTING

The most magical event I've ever experienced! #lanternfestival #upliftingmoments

YI PENG FESTIVAL, CHIANGMAI THAILAND

WORKPLACE FRAUD

Our business success depends on honest and transparent operations.

We must all be committed to preventing fraud and detecting it as soon as it occurs so that the Company can quickly remedy the situation and minimize any adverse consequences.

Fraud means those activities involving dishonesty and deception intended to result in financial or personal gain or some other unfair advantage. Fraud can range from intentional distortion of financial statements to embezzlement, theft or misuse of Company assets, or exaggeration of expenses. The Company provides training and resources on the consequences of fraud, methods to prevent fraud and the correct procedures for reporting suspected fraud. We also have internal controls and processes to detect fraud risks to our business. If you have any questions about fraud or fraud prevention, please ask your Manager or contact one of our reporting channels.

We must all be committed to preventing fraud and detecting it as soon as it occurs so that the Company can quickly remedy the situation and minimize any adverse consequences.

FINANCIAL REPORTING, DISCLOSURE AND INTERNAL CONTROLS

As a NASDAQ-listed public company, we are required to provide public disclosures, including financial information, about the Company. It is important that we accurately report financial and other information about the Company to the public. Failure to do so could result in liability to the Company and, in certain cases, to officers, directors or employees of the Company, and could result in a loss of confidence in the Company by investors, analysts and others.

Our public statements, including our press releases and public filings, should not contain any incorrect or misleading information. Required filings with the US Securities and Exchange Commission (SEC) must be complete, timely and in full compliance with SEC requirements.



We must all ensure that the Company maintains an adequate system of internal controls and that our transactions are processed in a timely fashion in accordance with generally accepted accounting principles (GAAP) or other applicable local or statutory principles. We are responsible for devising and adhering to a system of internal controls designed to provide reasonable assurance that:

- ➔ Each transaction has been properly recorded and has been appropriately authorized by management
- ➔ Company assets are appropriately safeguarded and used only in a manner consistent with management's authorization
- ➔ Each transaction is recorded in a manner sufficient to allow the Company to account for its assets and liabilities, as well as to prepare financial statements under appropriate accounting standards

Each Company employee has a role in ensuring that our books and records are accurate and that our system of internal controls is effective and not circumvented. In connection with this requirement, all Company employees must obtain sufficient documentation supporting the transactions with which they are involved. Falsified, misleading or inaccurate books and records violate the law and could result in significant fines and even jail terms.

THE RIGHT RESULTS THE RIGHT WAY

If you are asked to prepare, submit or approve a contract, payment voucher or any other Company document or record that does not accurately reflect the substance of the transaction, you should refuse to do so and immediately [report](#) this conduct through the channels set out under Reporting and Investigation.

Similarly, you must never request that a third party (including a vendor, supplier, consultant or other third party) submit a record that does not accurately reflect the substance of the transaction.

You are encouraged to come forward with any concerns if you suspect others may be either inadvertently or intentionally subverting or circumventing our internal controls. Please remember that we will not tolerate any retaliation taken against an employee who raises a concern in good faith.



ADDITIONAL RESPONSIBILITIES FOR DIRECTORS, OFFICERS AND EMPLOYEES INVOLVED IN DISCLOSURE MATTERS

In addition, each director, officer or employee involved in the Company's disclosure process is required to be familiar, and to comply, with the Company's disclosure controls and procedures, as well as all internal controls over financial reporting, to the extent these controls are relevant to his or her area of responsibility.

Each person having direct or supervisory authority regarding SEC filings or any of the Company's other financially related public communications, should take all appropriate steps to ensure full, fair, accurate, timely and understandable disclosures, including consulting with other Company officers.

Each director, officer or employee who is involved in the Company's disclosure process must:

- ➔ Become familiar with the disclosure requirements applicable to the Company, as well as to the business and financial operations of the Company
- ➔ Never knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, including the Company's independent auditors, governmental regulators and self-regulatory organizations
- ➔ Properly review and critically analyze proposed disclosure for accuracy and completeness (or, where appropriate, delegate this task to others)



FINANCIAL CRIME, TAX EVASION AND MONEY LAUNDERING

We are committed to complying with all applicable laws, rules and regulations that combat financial crime in all its forms, including tax evasion and money laundering. Tax evasion is failing to pay or deliberately underpaying taxes by concealing income or information from tax authorities. Money laundering is the process of concealing illicit funds or making them look as though they are legitimate. In addition to fulfilling our own tax obligations, we must never facilitate tax evasion by another party. This could arise if we knew a partner, supplier or vendor was making false statements or hiding income, gains or assets from tax authorities, but we failed to prevent it. We must take steps to ensure that we only conduct business with reputable vendors, suppliers, contractors, customers and clients involved in legitimate business activities with funds derived from legitimate sources. **We must never engage in any transaction that is structured in a way that could appear to conceal illegal conduct or the tainted nature of the proceeds or assets involved.** If you suspect that a transaction in which we are involved might involve any form of financial crime, contact your Legal Department or your Compliance & Ethics Officer immediately.

We must take steps to ensure that we only conduct business with reputable vendors, suppliers, contractors, customers and clients involved in legitimate business activities with funds derived from legitimate sources.

THE RIGHT RESULTS THE RIGHT WAY

Be alert for attempts to make or request payments:

- In currencies other than those specified in the invoice, contract or jurisdiction where the services will be performed
- To or from other countries with no apparent connection to the business
- In cash or cash equivalents
- To or from someone not party to the transaction
- To or from an account other than the normal business relationship account
- With multiple checks or drafts
- Where you recognize that there are overpayments
- Involving unknown or unnecessary intermediaries unless you are clear about their role
- With unnecessary complexity or no obvious legitimate business purpose
- Involving high-risk countries or counterparties
- Without an itemized invoice containing a clear description of services rendered

Should you encounter any of these red flags, you should [report](#) the issue to your manager or your Legal Department.

If you are unsure, **ask before acting!**



GIFTS AND CONFLICTS OF INTEREST

Finding paradise in the streets of Japan. #sightseeingtokyo #backpackingjapan

SIGHTSEEING, JAPAN

GIFTS AND ENTERTAINMENT

Giving and receiving business gifts or entertainment is a customary way to strengthen business relationships and, with some restrictions, is a lawful and acceptable business practice.

However, gifts and entertainment must never compromise the integrity of the Company's business relationships.

Beware when doing business with government officials. Although providing gifts and entertainment to any party can raise issues, the risk is particularly significant when government officials are involved. You must not offer or provide any gifts or entertainment in connection with government or government official interaction without prior written approval from your Legal Department. In addition, any gifts or entertainment must strictly adhere to the [Global Anti-Bribery and Corruption Policy](#) and your brand company's [Gifts and Entertainment Policy](#).

In general, it is our policy that Company employees may give and receive appropriate business gifts or entertainment in connection with their work with suppliers and other nongovernmental parties; however, all such gifts or entertainment must meet the following standards:

- ➔ Must be legal and consistent with accepted and customary business practices
- ➔ Must not be repeated or overly frequent from one source, creating a pattern
- ➔ Gifts must be of nominal value - less than \$100 USD or foreign currency equivalent
- ➔ Can't look like a bribe or kickback or appear to be intended to influence or reward a particular decision or action
- ➔ Must not be provided during a contract negotiation in which you are involved, or within three months prior to contract renewal
- ➔ Can't be cash, or a cash equivalent, gift card, gift certificate (worth more than \$50 USD) or similar
- ➔ Must be appropriate and not embarrass the Company if publicly disclosed

There are exceptions and caveats to this general statement on gifts and entertainment. For further information, guidance and restrictions, please consult your [Gifts and Entertainment Policy](#).



CONFLICTS OF INTEREST

As employees, we have a responsibility to act in the best interest of the Company at all times. This responsibility includes avoiding both real and perceived conflicts of interest, which arise whenever our personal, social or financial interests interfere, or even appear to interfere, with the interests of the Company. Whether you're an employee, officer, or director, you have a duty and responsibility to act in the best interest of the Company at all times. The following are some common examples of potential conflicts of interest:

OUTSIDE EMPLOYMENT

Having outside employment could impair your ability to act in the Company's best interests or reduce your productivity, particularly if the second job is with a competitor or if the work hours overlap with your Company workday.

Outside employment does not just apply to traditional second jobs—it also refers to self-employment, business ownership or start-ups, and professional or consulting services that can be performed during or outside the normal workday. It violates Company policy to use Company resources (including time during working hours) for non-Company business.

If you are considering a second job outside of the Company that may present a conflict, please complete a [Conflict of Interest Disclosure Form](#) according to your brand company procedure.

CORPORATE OPPORTUNITIES

Employees, officers and directors are prohibited from taking (or directing to a third party) a business opportunity that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and turned it down. More generally, you are prohibited from using corporate property, information or position for personal gain and from competing against the Company.

Sometimes the line between personal and Company opportunities is difficult to draw, and there may be both personal and Company opportunities in certain activities. Please consult with your manager before using Company property, information or your position at the Company in a manner not solely for the benefit of the Company.

OUTSIDE AFFILIATIONS AND FINANCIAL INTERESTS

You must ensure that your private affiliations, activities and financial interests do not conflict with your obligations to act in the Company's best interests.

Employees may not hold Significant Financial Interests in Booking Holdings competitors or suppliers.

Significant Financial Interests are financial interests that:

- Interfere with your ability to perform your job and duties
- Conflict with the interests of the Company
- Affect your ability to act in the best interests of the Company
- Risk damaging the Company's business or reputation

If you think you may hold a Significant Financial Interest in a supplier or competitor of Booking Holdings, you are required to complete a Conflict of Interest Disclosure Form. If you have any questions about what constitutes a Significant Financial Interest, please contact your Compliance & Ethics Officer.

In addition, employees may not serve on a managing or supervisory board of directors (or any similar authority or body) of any organization that supplies goods or services to the Company or competes with the Company unless they obtain the approval of the Global Compliance & Ethics Officer or the Chief Legal Officer.

FAMILY AND PERSONAL RELATIONSHIPS

You must avoid situations where family or personal relationships conflict, or appear to conflict, with your obligation to act in the best interest of the Company at all times. Certain personal relationships can:

- ➔ Interfere with employees' independent judgment
- ➔ Create employee morale issues
- ➔ Lead to claims of conflicts of interest or even sexual harassment
- ➔ Create the appearance of impropriety
- ➔ Result in favoritism or nepotism

It is the Company's expectation that employees will take personal responsibility to ensure that they do not engage in relationships that disrupt or negatively impact the workplace.

As an employee, you **must not** be directly or indirectly involved in any line management, or have the ability to review or influence the employment status, on-the-job evaluation, pay or benefits or any other work condition, of any individual with whom you have a personal relationship.

TAKE NOTE

"Personal relationships," for the purposes of the Code, are relationships that extend beyond professional relations. Personal relationships include:

- Family or familial relationships (siblings, parent/child, husband/wife, de facto spouses, partners, cousins, nephews, nieces, aunts, uncles, grandparents, grandchildren or relations by marriage such as brothers- or sisters-in-law)
- Romantic and/or sexual relationships
- Other close personal friendships or relationships

You should not participate in, or seek to influence, any decisions relating to Company business with family, friends and close relatives. The Company selects all vendors, suppliers and business partners, and makes all employment decisions, on the basis of the candidates' qualifications and not on the basis of any family connections or personal relationships.

Employees cannot derive any improper benefit from Company business transactions with anyone with whom they have a personal relationship as a result of their position with the Company.

Romantic or sexual relationships between staff members where one individual has influence or control over the other's conditions of employment are inappropriate. These relationships, even if consensual, may ultimately result in conflict or difficulties in the workplace affecting the legitimate interests of Booking Holdings. If such a relationship currently exists or develops, it must be disclosed.

The supervisor or staff member who has influence or control over the other's conditions of employment has an obligation to disclose his/her relationship to the department head or next level of administrator, to Human Resources, or Compliance (according to your brand company procedure). The other staff member involved in the relationship is encouraged to disclose the relationship to either the next level of administrator, Human Resources, or Compliance (according to your brand company procedure).

Although both employees involved in a consensual romantic or sexual relationship are individually responsible for disclosure, a supervisor's failure to report such a relationship will be regarded as a serious lapse in his or her management of the workplace and grounds for appropriate disciplinary action.

Please consult the [Personal Relationships at Work Policy](#) for further guidance on this topic.

THE RIGHT RESULTS THE RIGHT WAY

Employees must avoid relationships, investments and opportunities where personal interests conflict with the Company's best interests. If you find it difficult to make a fair and impartial business decision on behalf of the Company because of competing personal interests, you should immediately consult with your manager, a member of HR and/or your Compliance & Ethics Officer to address the situation.

Finally, it's important to understand that as circumstances change, a situation that previously didn't present a conflict of interest may present one later. You are obligated to bring up any situations that may constitute a real or potential conflict of interest or even constitute the appearance of a conflict of interest.

If you become aware of a situation that may present a conflict of interest, please complete a [Conflict of Interest Disclosure Form](#) according to your brand company procedure. In many cases, the conflict can be resolved or mitigated through simple steps and/or controls.

POLITICAL AND CHARITABLE ACTIVITIES

Employees are free to participate in the political process and in charitable activities. However, unless you are participating in company-sponsored or company-authorized activities, you must do so on your own time and with your own resources. It is improper to use Company property, equipment or time for personal activities. Additionally, employees must participate in political or charitable activities as private citizens, not as representatives of their employer.

The Company may engage in public policy issues pertinent to the Company's interests, and may, with the approval of the Board of Directors or its designee, make political and charitable contributions as the law and our internal policies allow.

We abide by all lobbying laws and may engage employees or professional lobbyists to work with government officials on our behalf. The Company prohibits participation in any lobbying activities on behalf of Booking Holdings without specific authorization from the Company's Chief Legal Officer.

FAIR COMPETITION AND ANTITRUST

10,000 leagues under the sea! #underthesea #familyvacay #familyfun

VIRGIN GORDA, BRITISH VIRGIN ISLANDS



FAIR COMPETITION AND ANTITRUST

We believe that honest and fair competition is good for our customers and other market participants and brings out the best in each of us, including our competitors. **We are committed to competing fairly and honestly in the marketplace.**

Our business activities are subject to competition laws in most countries around the world. These laws are intended to promote fair competition by prohibiting activities that unreasonably restrain or inhibit competition. Competition laws apply to many aspects of our business, including sales, marketing, procurement, contracting and mergers and acquisitions. These laws specifically prohibit or restrict anti-competitive agreements or arrangements to:

- Fix, coordinate or control prices
- Facilitate collusive bidding or bid rigging
- Limit competition against other market participants
- Share information with competitors about prices, profits or profit margins
- Divide or allocate markets, territories or customers
- Exchange or share any unpublished information concerning prices or any other competitive information with a competitor

Although the spirit of these competition laws is straightforward, their application to particular situations can be quite complex. In many jurisdictions, including the US and the EU, violations of competition laws can lead to severe civil penalties and damage awards, as well as fines and jail sentences for individuals in criminal proceedings. If you have any questions about how antitrust and competition laws apply to a particular situation, please consult our [Global Competition Policy & Guidelines](#), and seek advice from your Legal Department before taking action.





INTERNATIONAL TRADE

Andiamo! #railwayheart #stazione #trainspotting

ROMA TERMINI RAILWAY STATION, ITALY

INTERNATIONAL TRADE

Due to the international nature of Booking Holdings' business, we are subject to the laws and customs of the many countries in which we operate. As such, we are responsible for understanding and complying with all applicable laws in those countries. Contact your local Legal Department immediately if local laws appear to conflict with the principles within this Code or with the laws of the country where you or your brand company is headquartered.

RESTRICTED COUNTRIES AND PARTIES

We are committed to complying with applicable embargoes and trade sanctions, including the restrictions maintained by the US, EU, UN, the Netherlands, Singapore and the UK (or other applicable laws). These laws prohibit dealings with restricted countries, governments, businesses and individuals.

Under these laws, issues can arise in our relationships with vendors, suppliers and other business partners and customers. We maintain internal guidelines regarding the allowable activities in various countries subject to sanctions. For further guidance in this area, you should consult your Legal Department, the Global Compliance & Ethics Officer, or the [Global Sanctions Policy](#).

IMPORTS, EXPORTS AND BOYCOTTS

If your role involves sending or receiving goods such as information technology equipment, software, promotional materials or other equipment across national borders, you have an obligation to learn and understand the applicable import and export laws (particularly with respect to dual use/military goods). These laws apply to transfers within and among Booking Holdings' brand companies as well as to transfers with third parties such as vendors, licensors and suppliers. Companies and individuals that violate export control or import laws could be subject to severe civil and/or criminal penalties. Contact your Legal Department or Compliance & Ethics Department if you have any questions regarding import and export matters or issues.

You must also avoid agreeing to participate in any illegal or unsanctioned boycotts of specific countries, governments, businesses and individuals. If you are asked to participate in or agree to a boycott, contact your Legal Department or the Global Compliance & Ethics Officer.

THE RIGHT RESULTS THE RIGHT WAY

Violations of any trade restrictions can lead to severe civil penalties and damage awards, as well as fines and jail sentences in criminal proceedings for any employees, officers and directors involved.

International trade laws can be complex and difficult to navigate. If you work in a department that deals with these matters, you must consult your Legal Department before making decisions that could violate international law or US laws regulating international business.

If you are unsure, ask before acting!

A photograph of a dog sled team in a snowy landscape. Two dogs are visible pulling a sled. The scene is set during sunset or sunrise, with a warm glow on the horizon and a blue sky with scattered clouds. A lone evergreen tree stands on the left, and bare deciduous trees are in the background. The sled is in the foreground, partially visible.

INSIDER TRADING

No place I'd rather be #dogsladdingadventure #alaskamalamute #winterwonderland

DOG SLEDDING, CANADA

INSIDER TRADING

We strictly prohibit insider trading. Insider trading laws prohibit individuals from purchasing securities of a company or otherwise profiting, while in possession of material non-public information about that company. The laws also prohibit the disclosure of material non-public information to others ("tipping"), who then trade or otherwise profit from that disclosure. Tipping includes recommending, while in possession of material non-public information, to others that they trade even if the underlying material non-public information is not disclosed.

Our employees must use caution and should never directly or indirectly trade Booking Holdings securities or those of any other publicly traded company based upon confidential or non-public information. Additionally, you should never disclose or otherwise convey confidential Company information that may be in your possession unless authorized to do so.



Material information includes information that may have or is likely to have a significant effect on the price of securities. Information is also material if there is a substantial likelihood that a reasonable person would consider it important in making an investment decision, including:

- Price-sensitive information
- Business-sensitive information
- Competition-sensitive information
- Unannounced financial results
- Significant new or lost contracts
- Major changes in management
- Government investigations (including dawn raids)
- Pending material lawsuits or material legal settlements
- Potential mergers, acquisitions or divestments
- Significant new products or offerings

The stakes in this area are high, with non-compliance possibly resulting in sizable fines and imprisonment, as well as Company discipline (which can include termination). Consult with your Legal Department if you have any questions in this area and always refer to the [Insider Trading Policy](#) before purchasing or selling Booking Holdings securities.



PRIVACY AND DATA SECURITY

Today is a good mood. #cafeparisien #sundaymorningmood

CAFE, PARIS

PRIVACY AND DATA SECURITY

We collect and process millions of instances of customer personal information, including names, credit card information, email addresses and travel itineraries. Our customers provide their personal information to us with the expectation that we will safeguard it appropriately from misuse and/or unauthorized processing. Accordingly, the Company follows applicable privacy and data security laws and our own [Protecting Personal Data Policy](#) and [Data Security Policies](#) when collecting, processing and handling the personal information of customers, fellow employees and third parties.

Employees must at all times maintain the privacy, security and confidentiality of all personal information entrusted to them, except when disclosure is authorized or legally mandated. Additionally, employees must:

- Collect only the data that is required for a specific business activity
- Access personal information for legitimate business purposes only
- Store and dispose of personal information and other sensitive data in a secure manner
- Transmit personal information (securely via encryption in case of likely risks) only to authorized parties who are obligated to use it only for its intended purpose and to protect its confidentiality
- Promptly report any possible data incidents or security risks to their Brand Privacy Officer

OUR PRIVACY PRINCIPLES

- 1 TRANSPARENCY.** We are transparent about our data practices.
- 2 EMBEDDED PRIVACY.** We build privacy into our products from start to finish.
- 3 CONTROL.** We put individuals in control, so that they have choices about and access to their information.

- 4 SECURITY.** We safeguard personal data.
- 5 PURPOSE.** We collect only what we need and use Personal Data to process your data in accordance with our disclosed data practices.
- 6 ACCOUNTABILITY.** We take responsibility for and do the right thing with personal data.

PROTECTING THE PERSONAL INFORMATION OF EMPLOYEES

We make a deliberate and concerted effort to maintain the privacy and security of our employees' PI.

Employees that have access to, or work with, the PI of our fellow colleagues have a responsibility to handle that PI appropriately and to take all reasonable precautions to preserve its confidentiality in accordance with our own privacy and data security policies.

Should you have any questions on this topic or wish to report any potential data security incident, please consult your brand company's [Data Security Policies](#) or contact your manager, your Legal Department and/or your Information Security Officer.



PROTECTION OF COMPANY ASSETS

Celebrating everyday! #carnival #colorfullife #carnivalbrasileiro

CARNIVAL, BRAZIL

PROTECTION OF COMPANY ASSETS

All employees, officers and directors should protect the Company's assets and ensure their efficient use. Company assets include resources such as office supplies, equipment (laptops, mobile phones, etc.), communications systems and vehicles as well as proprietary information, financial resources and Company files, records and documents.

PHYSICAL ASSETS

Employees should use Company assets responsibly and avoid waste, misuse or theft of Company property. While Company assets are intended for legitimate business purposes only, the Company generally allows employees the reasonable, limited personal use of electronic resources, including phones, computers, Internet connections, voicemail and email.

Certain departments and country locations may implement more restrictive policies concerning use of Company resources for personal use, so please check with your manager or department head.

If limited personal use is permitted in your department, it should be brief and occasional in nature and must not interfere with your work or responsibilities to the Company.

Subject to the limitations of applicable law, the Company reserves the right to monitor and access employee communications made through Company systems.

PROPRIETARY INFORMATION

Our obligation to safeguard Company assets includes protecting proprietary Company information. This includes all intellectual property such as software code, patents, trade secrets, business plans, copyrights and trademarks.

Proprietary Company information is highly confidential, and its unauthorized or improper release could negatively impact our future success. You should never disclose proprietary information without proper authorization and a non-disclosure agreement from your Legal Department. Your obligation to maintain the confidentiality of the Company's proprietary information continues even after your employment at the Company ends.

TAKE NOTE

You should never disclose proprietary information without proper authorization and a non-disclosure agreement from your Legal Department.

RESPECTING THE INTELLECTUAL PROPERTY OF OTHERS

We will respect the intellectual property rights of third parties and will not intentionally infringe or improperly use others' intellectual property.

In most cases, if we want to use the intellectual property of another person or company, we need to purchase it or acquire a license to use it. It is your responsibility to determine whether we own or have the right to use any intellectual property you would like to use. If you are not sure, ask your Legal Department.

If we have a license to use another company's or person's intellectual property, you must follow any limitations included in the license and any usage guidelines or other restrictions provided by the owner.

RECORDS MANAGEMENT

We each have a responsibility to create and maintain accurate business records and communications. The Company makes important business decisions based upon records created across the organization and their accuracy is vital. Common examples of business records include:

- Expense reports
- Invoices
- Time records
- Financial reports
- Personnel files
- Business plans
- Contracts
- Customer lists

All records should be maintained and destroyed in accordance with your brand company's Records Retention Policy. Never destroy records to conceal potential wrongdoing or hinder an investigation.

In the event of a hold related to litigation or an investigation, you must suspend any relevant document deletion and consult your Legal Department before taking any destruction action with respect to any business records related to the legal hold.

If you have questions on the appropriate handling and disposal of Company records, you should consult with your manager, or your Legal Department.





FAIR DEALING

Took us a while to get here, but the trip was worth it. #seasideview #naturewalk

WALK ON THE BEACH, SWEDEN



FAIR DEALING

We do not seek competitive advantages through illegal or unethical business practices. We endeavor to deal fairly with our customers, service providers, suppliers, competitors and other brand company employees. We should not take unfair advantage of anyone through manipulation, deception, concealment, abuse of privileged information or misrepresentation of material facts.

Our reputation with our customers is based on mutual respect and our commitment to providing truthful and transparent information about the services we provide. We make sure that information in our advertising, marketing and other promotional materials is always accurate and never misleading or deceptive.

Learning about our competitors is good business practice, but it must be done fairly, based on publicly available information such as news reports and industry surveys, and always in compliance with all laws and regulations in the US and abroad. Non-public competitive information can include information about a competitor's products, services, markets, pricing, trade secrets or business plans.

We may also learn competitive information appropriately from others (unless they are prohibited from sharing the information) by purchasing the information or obtaining a license to use it.

Never seek or use:

- Information obtained by unethical means, including eavesdropping or the unintended receipt of an email from or about a third party
- Proprietary information of others
- Information obtained in exchange for compensation, employment considerations, gifts or anything else of value
- Non-public information about a former employer solicited from a new hire
- Information containing technical or engineering data that may be protected by trade secret laws



A woman with curly hair is holding a young child with curly hair. They are standing in front of a large window, looking out at an airport tarmac. A white airplane is visible outside, along with some ground service equipment. The scene is bathed in warm, golden light, suggesting sunrise or sunset. The text "SOCIAL MEDIA AND PUBLIC COMMUNICATIONS" is overlaid in large, white, sans-serif capital letters.

SOCIAL MEDIA AND PUBLIC COMMUNICATIONS

Airport hellos and goodbyes. #travelgram #airportlife

FAMILY, AIRPORT

SOCIAL MEDIA

Employees must exercise sound judgment when posting Company-related comments anywhere on the Internet, including blogs, social media and public-facing networking sites, such as Facebook and LinkedIn. In general, you should not be blogging or posting about Company matters unless you are an official Company spokesperson. If you are authorized to make comments, they should be in good taste, and not include vulgar, demeaning or embarrassing content. Postings must not disclose proprietary or confidential information such as Company performance, business plans, pricing, etc.

PERSONAL USE

Because we respect our employees' right to privacy, we usually do not take an interest in what anyone does outside of work, unless it impairs their work performance, or threatens our reputation or legitimate business interests.

You should be particularly mindful when participating in online conversations that reference Booking Holdings or your brand company, and posting using Company equipment or through the Company network. Be aware that taking public positions online that are counter to the Company's interests may cause conflict and can have disciplinary repercussions.

While we all have the right to express our views and opinions, you are personally responsible for the public comments you post on the Internet. In accordance with applicable law, the Company may monitor social media and other Internet sites to ensure that posts do not reflect badly upon the Company or damage its reputation.

Please refer to the [Social Media Policy](#) for further detail and if you have any questions on the topic.

COMMUNICATIONS WITH THE PUBLIC, INVESTORS AND THE MEDIA

We have designated certain spokespersons to speak for and on behalf of the Company, and unauthorized employees must refrain from doing so. All inquiries, media questions and requests for interviews or speaking engagements should be referred to your brand company's Public Relations team or your Legal Department immediately. For further detail, please consult our [Corporate Communications Policy & Guidelines](#).



A photograph of a group of people sitting at an outdoor cafe in Belgium. In the foreground, a Black woman with short curly hair, wearing a teal jacket and large hoop earrings, is smiling and looking upwards while holding a glass of beer. Behind her, a man with dark hair is also smiling and holding a glass of beer. Another person's hand is visible on the right, also holding a glass of beer. They are all clinking their glasses in a toast. The background is a blurred street scene with buildings and traffic lights. The word "CONCLUSION" is overlaid in large white letters across the middle of the image.

CONCLUSION

A successful day of sightseeing! #belgiumtrip #livetotravel

CAFE, BELGIUM



We must all work together to promote ethical and legal behavior and to make sure we always achieve *The Right Results, The Right Way*. To that end, we must strive to ensure compliance with both the letter and spirit of this Code. Always remember to:

- ➔ Refer to available Company resources, such as your [Employee Handbook](#) and other [Policies](#)
- ➔ [Report](#) suspected legal and Code violations promptly
- ➔ Encourage colleagues to commit to high ethical standards
- ➔ **When in doubt, ask before acting!**

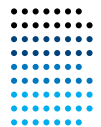
WAIVER/CONFLICT WITH OTHER POLICIES

There may be rare and unforeseen circumstances when an exception must be made to the provisions of this Code. In these limited instances, only the Board of Directors may waive a provision of this Code. The Company will promptly disclose any such waiver as required by law.

In the event of a conflict between the provisions of the Code and provisions contained in other Company policies (including your Employee Handbook), the provisions and principles contained in the Code shall prevail. In the event of any such conflict, your Legal Department and/or local Compliance & Ethics Officer is vested with the primary authority to interpret how this Code applies to a given situation in the first instance, with review from the Global Compliance & Ethics Officer and/or the Chief Legal Officer. Ultimate authority for the interpretation of the Code rests with Booking Holdings' Board of Directors.

This Code does not provide any rights, contractual or otherwise, to any third parties. The provisions of the Code are subject to revision, supplement, change or amendment at any time as determined appropriate by the Company and in accordance with applicable law.

This Code of Conduct was last updated on March 3, 2023.



BOOKING HOLDINGS

