



2025 MODERN SLAVERY STATEMENT

INTRODUCTION

This Modern Slavery Statement sets out the actions taken by Booking Holdings Inc. and the Booking Holdings corporate group ("we," "us," and "our") to assess, prevent, and mitigate modern slavery in our operations and supply chains.

We prepared this Statement in consultation with our brands and subsidiaries and in accordance with the UK Modern Slavery Act 2015 (the Modern Slavery Act), for the financial year ending on December 31, 2024.



OUR BUSINESS

Booking Holdings Inc. is the world's leading provider of online travel and related services, provided to consumers and partners in more than 220 countries and territories. Our mission is to make it easier for everyone to experience the world. We aim to provide consumers with a best-in-class experience offering the travel choices they want, with tailored planning, payment, language, and other options, seamlessly connecting them with our travel service provider partners. We offer these services through five primary consumer-facing brands: Booking.com, Priceline, Agoda, KAYAK, and OpenTable.

Booking.com

Booking.com is the world's leading brand for booking online accommodation reservations, based on room nights booked, with operations worldwide and headquarters in Amsterdam, The Netherlands. As of December 31, 2024, Booking.com offered accommodation reservation services for approximately 4 million properties in over 220 countries and territories as well as flights, in-destination tours and activities, rental car reservation services, and airport ground transportation services.

Priceline

Priceline is a leader in discount travel reservations primarily in North America, with headquarters in Norwalk, Connecticut, USA. Priceline offers online accommodation, flight, and rental car reservation services, as well as vacation packages, cruises, activity, and hotel distribution services for partners and affiliates.



Agoda

Agoda is a leading online accommodation reservation service catering primarily to consumers in the Asia-Pacific region, with headquarters in Singapore. Agoda also offers flight, ground transportation, and activities reservation services.

KAYAK

KAYAK, headquartered in Stamford, Connecticut, USA, provides online meta-search services that allow consumers to easily search and compare travel itineraries and prices from hundreds of online travel platforms at once. KAYAK offers its services in over 60 countries and territories.

OpenTable

OpenTable is a leading brand for booking online restaurant reservations. With significant operations in San Francisco, California, USA, OpenTable provides online restaurant reservation services to consumers and reservation management services to restaurants, primarily in the United States.

OUR WORKFORCE

As of December 31, 2024, we employed approximately 24,300 employees, of which approximately 3,100 were based in the United States and approximately 21,200 outside the United States. We retain independent contractors to support certain functions, but approximately 99% of our employees are full-time employees.

OUR APPROACH

Respecting Human Rights and Addressing Modern Slavery

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 may be involved, including modern slavery risks.

Our commitment is based on internationally recognized standards and principles, including the [United Nations \(UN\) Guiding Principles on Business and Human Rights](#).

Booking Holdings Inc. expects any human rights concerns are raised through the appropriate reporting channels. Any internal or external party can report concerns of modern slavery through our [Compliance Helpline](#).

As a company that facilitates global travel, we recognize that there are potential risks of modern slavery in our operations and supply chains, including in sectors where elevated modern slavery risks have been identified, such as those in the accommodation, cruise, retail, food, and transportation sectors. Risks also may exist in connection with routine office activity support, such as cleaning services and office supplies.



OUR ACTIONS

After assessing and considering the impact of the Modern Slavery Act on our business, we completed the following actions, which we continue to evaluate, review, and enhance where appropriate.

EMBED POLICIES

Code of Conduct – Our Core Values, [Code of Conduct](#), and corporate policies all reflect and convey our collective commitment to Absolute Integrity, which is the bond that unites us and is woven into everything we do. All directors, officers, and employees, wherever they are located, are expected to adhere to the Code of Conduct and espouse the principles and values it embodies at all times. The Code of Conduct outlines our commitment to respect and promote human rights.

Supplier Code of Conduct – We expect our Suppliers to share our commitment to our value of Absolute Integrity and adhere to high ethical standards, applicable laws, and the requirements established in our [Supplier Code of Conduct](#) when doing business with us.

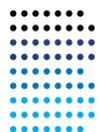
The [Supplier Code of Conduct](#) outlines our requirement for suppliers to adhere to human rights and workplace respect. Under no circumstances should a supplier use, facilitate, or benefit from modern slavery or human trafficking, including forced or compulsory labor, debt bondage, servitude, and child labor. Exploitation and coercion (including physical, mental, verbal, and financial) are strictly prohibited.

Human Rights Statement – Our company-wide [Human Rights Statement](#) sets out our commitment to respect and promote human rights, our expectations of our employees, customers, suppliers, and partners, our prioritization of salient human rights risks and opportunities, and our governance of these risks.

Fair Pay – We remain committed to paying our employees a fair salary and benchmark salaries annually.

Contractual Clauses – We continue to review and update our contractual terms and agreements with a view to requiring our suppliers to adhere to legal protections against modern slavery. Booking Holdings Inc. and Booking.com's procurement contracts for suppliers include provisions obligating compliance with applicable laws related to modern slavery. Booking.com's General Delivery Terms for accommodation partners require respect for human rights, including prohibitions on child labor, forced labor, and unsafe working conditions. All of our brands require compliance with equivalent local laws and regulations, and our Code of Conduct principles. We would rather lose business than achieve it through unethical or illegal means. If, after inquiry, any organization within our supply chain is unable to demonstrate its commitment to these obligations, either it will not be taken on as a supplier or existing services will be terminated.

Varying contractual terms and conditions on ethical business, fair working practices, and compliance with applicable legislation are included in new, renewed, and existing agreements with suppliers and partners.



IDENTIFY, ASSESS & ADDRESS IMPACT

Screening and Due Diligence – We conduct screening throughout our value chains to detect parties and organizations that are subject to restrictions, including those associated with modern slavery offenses under applicable sanctions regimes. Should any parties fail the screening process, we have the ability to suspend and, if necessary, terminate our relationship(s) with them.

Digital Services Act Risk Assessment – The European Union’s Digital Services Act (DSA) aims to create a safer digital space where the fundamental rights of users are protected. Booking.com conducts an annual DSA risk assessment, aimed at identifying and assessing systemic risks in the EU stemming from the design or functioning of its service or from the (mis)use of its services, including the risk of human trafficking. The results of the assessments performed so far (in 2023 and 2024) have been shared with the European Commission and made publicly available. In 2024, we also developed a DSA External Stakeholder Engagement Strategy, which outlines a focused, inclusive, and transparent approach to engage with external stakeholders.

Detection and Response – Booking.com has processes in place to mitigate human trafficking risks focused on accommodation providers – including internal trafficking prevention guidelines and content moderation guidelines and controls. This includes standard operating procedures and reporting channels for accommodation partners and travelers.

TRAINING

Employee Training – Booking.com has mandatory training on human trafficking and child sexual exploitation prevention for Customer Service and External Partner Services teams, which consist of external-facing staff who are more likely to encounter modern slavery risk escalations from travelers and travel partners.

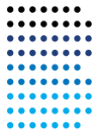
Booking.com also published a guidance article on combatting modern slavery and human trafficking on our Customer Service intranet, including indicators of modern slavery and escalation paths for internal assessment and response of reports received. We continue to conduct workshops and briefings on modern slavery for internal teams.

Accommodation Partner Training – Booking.com has articles on its [Partner Hub](#) to educate and support partners on human rights and trust and safety issues, including on [modern slavery and human trafficking](#) and the [Trust & Safety Community Guidelines](#).

In 2024, Booking.com launched [a free online training module on Detecting Human Trafficking](#) in collaboration with [Protect All Children from Trafficking \(PACT\)](#) for accommodation partners in Australia, Canada, Ireland, New Zealand, UK, and USA. Booking.com also partnered with the [World Tourism Organization of the United Nations \(UNWTO\)](#) on [a series of free online courses](#) designed to support accommodations on their journey to operate more sustainably, including topics such as responsible purchasing practices and meaningful employment.

The training and resources will help Booking.com better assess, mitigate, and remedy reports of potential human trafficking that it receives, and will help partners identify signs of trafficking and how best to respond and report suspected trafficking at their accommodation site.

Industry Training – In collaboration with 14 other companies and civil society organizations, Booking.com helped create [publicly available human rights due diligence training for the tourism sector](#). Led by the [Roundtable on Human Rights in Tourism](#) and [Futouris](#), the training includes topics on modern slavery, decent living, and fair wages.



PARTNERSHIPS AND STAKEHOLDER ENGAGEMENT

The Code – Booking.com is a member of [The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism](#) and is working on internal policies and processes to address the risk of child exploitation in its value chains.

Partnerships – As part of our human rights due diligence process and in an effort to bolster our ability to detect, disrupt, and raise awareness about modern slavery in the tourism industry, we engage with a number of leading anti-trafficking organizations and civil society groups that work with rights-holders.

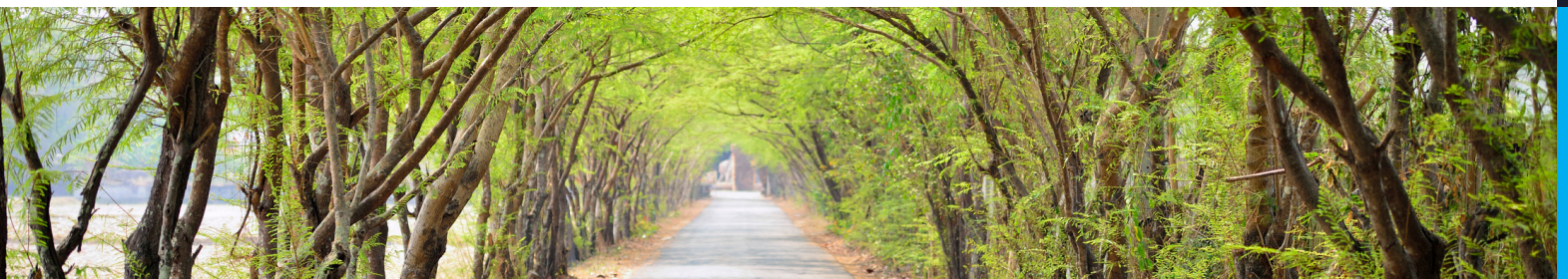
Industry Awareness – We continue our engagement with industry, governments, and civil society through meetings, speaking engagements, and events, in order to contribute to dialogue and continuous improvement to address modern slavery.

We are further working to expand our collaboration with experts in this space to improve our ability to detect, disrupt, and increase awareness of modern slavery risks across our operations, value chains, and the communities where we operate.

GRIEVANCE MECHANISM

Internal Mechanisms – We place a duty upon all employees to report either potential or actual violations of our policies, including potential or actual modern slavery risks, to their line manager, the Compliance Team, or the [Compliance Helpline](#). We have a zero-tolerance stance on retaliation against whistleblowers who report in good faith and our non-retaliation stance is set out in our Code of Conduct. We take all allegations seriously. All reports received through the Helpline are addressed and if appropriate, remedial action is taken. Annually, we publish an internal compliance report where colleagues can see aggregated data on reports the Compliance team has received through the Helpline and other means.

External Mechanisms – Suppliers and members of the community are also directed to the [Compliance Helpline](#) to report any breaches of the Supplier Code of Conduct or any human rights concerns. Additionally, Booking.com accommodation partners, as well as suppliers and travelers, are encouraged to report any violations of the Supplier Code of Conduct by contacting Booking.com's partner or customer services directly. These reports are redirected internally to our Trust & Safety team which will, then, perform a thorough assessment of the report and take appropriate remedial action if necessary. Booking.com users can also flag content that they think might be illegal through the Reporting Content form.





TRACK & REPORT

The UK Modern Slavery Registry – On March 11, 2021, the UK Government launched a Modern Slavery Statement Registry. We submitted our previous Modern Slavery Statements to the registry and are committed to submitting subsequent Statements to the Registry.

Booking Holdings Sustainability Report – We report on certain human rights topics in our annual [Sustainability Report](#).

Regulatory Review – We monitor regulatory developments of the UK Modern Slavery Act 2015 and are committed to promptly implementing any changes or requirements that come into effect.

Continuous Improvement – Based on the recommendations from our independent human rights impact assessment on modern slavery and human trafficking, we continue to take steps to improve and monitor our efforts to detect, disrupt, and increase awareness of modern slavery risks across our operations, value chains, and the communities where we operate.

APPROVAL

Approved and signed on behalf of the Board of Directors by its Corporate Governance Committee at a meeting on April 10, 2025.

