



BOOKING HOLDINGS

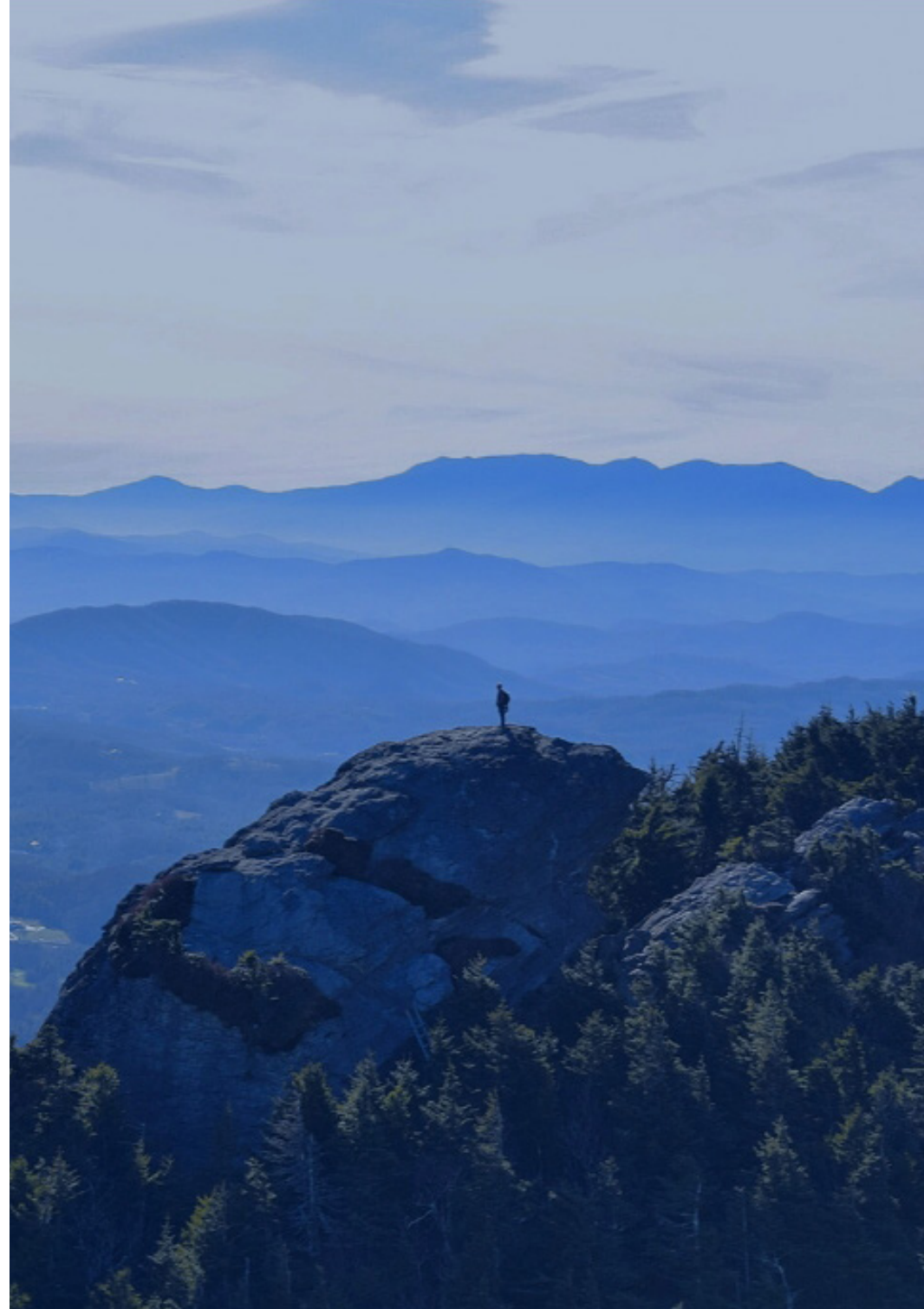


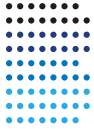
Supplier Code of Conduct



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Supplier Code of Conduct

At Booking Holdings, **we make it easier for everyone to experience the world**. This is our passion, and we strive to accomplish it with purpose and in line with our values, which are:

- Experiences of every kind, for everyone.
- Absolute Integrity.
- Relentless Innovation.
- Diversity gives us strength.
- The sum is greater than our parts.

The Right Results, The Right Way.

We collectively lead a global business that touches the lives of millions of people every day. We get **The Right Results, The Right Way**. We expect you, our Supplier, to help us deliver on our values and commitment to responsible business conduct at all times. Working together, we can maximize our positive impact and grow together in a sustainable and responsible way. As such, we require that all of our Suppliers comply with applicable laws, conduct business in a fair, honest, and ethical manner, and meet the requirements of this Supplier Code of Conduct ("Supplier Code").

Failure to comply with these requirements may be grounds for termination of the Supplier relationship.

Applicability.

This Supplier Code applies to Suppliers, defined as businesses and independent contractors that provide products or services to Booking Holdings or any of Booking Holdings' Brand companies (collectively, "Booking Holdings," the "Company," or "we"). It also applies to all individuals employed by a Supplier regardless of the type of contract or location of their work, and their subsidiaries, subcontractors, and agents who act as licensed/authorized resellers of their products and services to Booking Holdings.

Responsibility.

It is our responsibility to ensure that our Suppliers understand what is expected of them. It is your responsibility to familiarize yourselves with this Supplier Code and to take appropriate steps to ensure that your organization and your own subcontractors and agents comply with the fundamental principles of this Supplier Code.

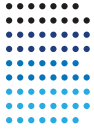
Accountability.

This Supplier Code is based on international standards, principles, and conventions, as well as the [Booking Holdings Code of Conduct](#). The specific requirements set out in this Supplier

Code are the minimum standards for our Suppliers. While we expect our Suppliers to comply with these requirements, we are committed to doing more than just complying with the minimum standards and encourage our Suppliers to do the same.

Thank you for your continued efforts and collaboration to adhere to our Supplier Code.





The fundamental principles of our Supplier Code

1. Conduct business lawfully and with integrity.
2. Treat employees with dignity and respect.
3. Respect human rights.
4. Respect local communities.
5. Run a sustainable and ethical business.





The Principles Explained

1 Conduct business lawfully and with integrity.

Compliance with Laws.

Suppliers and their subcontractors must comply with all applicable laws, regulations, and standards within the countries in which they operate and in which they carry out activities for Booking Holdings.

Bribery and Corruption.

We strictly prohibit bribery, corruption, kickbacks, fraud, theft, extortion, and embezzlement of any kind. Suppliers must comply with all applicable anti-bribery and corruption laws and maintain accurate books and records that correctly reflect their transactions. Suppliers must not give, offer, promise, request, agree to accept, or accept money or anything of value from anyone, directly or indirectly through another party, to obtain or retain business or gain influence, favorable treatment, or any other advantage related to Booking Holdings.

Conflicts of Interest.

Booking Holdings expects Suppliers to avoid and disclose all conflicts of interest that could adversely influence business relationships. A “conflict of interest” means any circumstance—potential, actual, or perceived—that may cause a party to prioritize their financial or personal interests or be biased in their business judgments, decisions, or actions. Any ownership or beneficial interest in a Supplier’s—or the Supplier’s own subcontractors and agents’—business by a government official, representative of a political party, or a Booking Holdings worker must be declared to Booking Holdings prior to entering into any business relationship with Booking Holdings.

Gifts and Entertainment.

Booking Holdings strongly discourages the giving and receiving of gifts to and from Company employees; however, we appreciate that in limited instances, gifts of nominal value may be customary in some countries and cultures to maintain business relations. Gifts should occur sparingly and always be reasonable and aligned with the [Booking Holdings Code of Conduct](#) and [Global Anti-Bribery and Corruption Policy](#). In no instance should Suppliers exchange gifts of cash or cash equivalents with Booking Holdings employees.

Any business entertainment with Booking Holdings must be reasonable, for the purpose of maintaining good business relations, and not intended to influence or reward a Booking Holdings business decision or action. Gifts and entertainment must never be received or offered during contract negotiation, bidding, tender, or award, regardless of the amount.

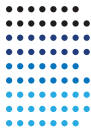
Confidential and Competitor Information.

Booking Holdings expects Suppliers to obtain and use market intelligence legitimately and in compliance with all applicable laws and regulations. Suppliers should not attempt to divulge to Booking Holdings any non-public competitive information about Booking Holdings’ or the Suppliers’ competitors. Likewise, Booking Holdings’ confidential information must not be shared with any third party, including the media, unless expressly permitted by Booking Holdings.

Safeguarding Information and Property.

Booking Holdings’ confidential and proprietary information, know-how, and intellectual property must be respected and safeguarded. This includes any and all personal information about individuals, such as Booking Holdings’ consumers or employees, which must be safeguarded in accordance with our commitments to consumers and employees, as well as all relevant data





protection laws and regulations. All information provided by Booking Holdings that is not in the public domain is deemed confidential and only to be used for its intended and designated purpose.

Booking Holdings expects Suppliers not to misuse or misappropriate Booking Holdings' physical assets and confidential and proprietary information. All such information and data must be kept confidential and protected from any unauthorized access, destruction, use, modification, and disclosure through appropriate organizational and technical controls.

Suppliers must also respect the intellectual property rights of all third parties. Booking Holdings expects Suppliers to take actions to ensure they do not infringe on the intellectual property rights of any third party, including Booking Holdings or its affiliates.

Financial Records and Insider Trading.

We require Suppliers' business and commercial dealings to be transparent and accurately recorded in the Supplier's books and records. Suppliers must not falsify records or misrepresent conditions or practices. No confidential information in the Supplier's possession regarding Booking Holdings or its affiliates may be used for any personal benefit, including [insider trading](#).

Financial Crime, Tax Evasion, Money Laundering, and Terrorist Financing.

We are committed to complying with applicable laws, rules, and regulations designed to prevent financial crime, including tax evasion, money laundering, and terrorist financing wherever we, our clients, our Suppliers, or our business partners operate.

At all times, Suppliers are expected to conduct business in a manner such that the opportunity for, and incidence of, financial crime is prevented. Furthermore, any individual or entity that performs services for or on behalf of Booking Holdings must not undertake any transactions that either cause Booking Holdings to commit tax evasion, money laundering, or terrorist financing, or facilitate tax evasion, money laundering, or terrorist financing by a third party.

Sanctions and Export Controls.

Suppliers must comply with applicable embargoes and economic sanctions, including the restrictions maintained by the U.S., EU, UN, the Netherlands, Singapore, and the UK (or other applicable laws). These laws prohibit dealings with restricted territories, governments, businesses, or individuals.

Suppliers must comply with all applicable export control regulations, including on the sending/receiving of goods, such as information technology equipment, software, promotional materials, or other equipment across national borders. Any individual or entity that performs services for or on behalf of Booking Holdings must not undertake any actions that cause Booking Holdings to participate in any illegal unsanctioned boycotts of specific countries, governments, businesses, or individuals.

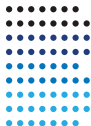
Public Affairs.

Suppliers engaged to conduct public affairs-related activities for Booking Holdings are expected to be guided by transparency, accountability, fairness, and integrity.

Suppliers must be authorized by Booking Holdings to participate in any consulting, public relations, or lobbying activity on the Company's behalf. Booking Holdings expects Suppliers to ensure that information provided is truthful, evidence-based, complete, and not misleading.

Offering or providing anything of value to a government employee, official, or to a family member of a government employee or official to influence decisions is prohibited; likewise, lobbyists, subordinates of lobbyists, or principals shall not solicit or receive anything of value from government officials.





Speaking Up and Non-retaliation.

To ensure early identification and remediation of concerns, Suppliers are expected to provide effective grievance mechanisms for stakeholders (including workers, trade unions and other rights-holders' representatives, civil society organizations, and members of the community) to raise concerns about violations of this Supplier Code or adverse human rights, environmental, or other impacts. If Suppliers do not have their own publicly-available, anonymous, and confidential reporting channel, they must inform the stakeholders listed above on how to raise a concern via the Booking Holdings [Compliance Helpline](#) (see the "Questions or concerns" section below).

2 Treat employees with dignity and respect.

Workplace Respect.

Booking Holdings expects Suppliers to establish a safe, respectful, and inclusive workplace for their workers. All workers must be treated with respect and dignity. No worker should be subject to any threats, bullying, violence, abuse, or harassment of any type, including emotional, physical, or sexual

harassment. Booking Holdings expects Suppliers not to discriminate against any person or group of people in its hiring and employment practices, codes of conduct, programs, services, compensation, advancement, discipline, termination or retirement or in any other aspect of its operations or activities on the basis of that person or group of people's personal characteristics or attributes. As an example, discrimination includes, but is not limited to, hiring and employment policies or practices that treat a person or group of people unfairly based on a protected characteristic, such as their race or sexual orientation, *even if such policies and practices are permitted under applicable law.*

Any form of disrespect and/or abuse or harassment towards Booking Holdings' employees is not tolerated.

Inclusion and Respect.

Booking Holdings encourages Suppliers to seek to create an inclusive and global workforce, and to expect their employees to support an inclusive culture, workplace, and community.

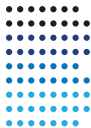
3 Respect human rights.

We expect our Suppliers to conduct their activities in a manner that respects human rights as set out in the [United Nations Guiding Principles on Business and Human Rights](#) and the [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#). Suppliers must take reasonable steps to prevent, mitigate, and remediate adverse human rights impacts. Suppliers must collaborate with Booking Holdings on requests for information, due diligence, and mitigation actions.

Work is conducted on a voluntary basis.

Employment must be chosen freely. Booking Holdings expects Suppliers to ensure that their workers understand their employment conditions and rights. Under no circumstances should Suppliers 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.





All workers are of an appropriate age.

Suppliers must not employ any person who is:

- Under the age of 15;
- Under the age of completing compulsory schooling; or
- Under the minimum age for employment in the country.

If children between the ages of 15 and 18 meet the above criteria to work, they must not engage in:

- Hazardous work;
- Work that interferes with their schooling; or
- Work that is harmful to their health or physical, mental, spiritual, moral, and social development.

Wage and working hours are reasonable.

Suppliers must pay their workers fair wages that meet or exceed the legal minimum standards or appropriate prevailing industry legal standards, whichever is higher. Compensation must include all legally-mandated benefits, such as medical insurance, social insurance, and pension.

With the exception of legally-mandated deductions, deductions from wages may only be made with the written consent of the workers

concerned and in compliance with applicable laws and international human rights standards. Deduction of wages as a disciplinary measure is prohibited.

Booking Holdings expects Suppliers to ensure that working hours for all workers are reasonable and that workers are not required to work more than the regular and overtime hours allowed by applicable law. All overtime work by workers is voluntarily by consent and compensated in line with relevant regulations.

All workers' health and safety are protected at work.

Suppliers must provide workers with a healthy, safe, and hygienic workplace and comply with all applicable laws on occupational health and safety. Booking Holdings expects Suppliers to prevent, address, and mitigate health and safety risks and accidents.

Work is conducted based on freely agreed and documented terms of employment.

Booking Holdings expects Suppliers to provide employment documents to all workers—whether permanent, fixed-term, or casual—that are freely agreed to and respect the legal and contractual rights of workers.

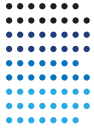
All workers are free to exercise their right to form and/or join trade unions or refrain from doing so, and to bargain collectively.

Booking Holdings expects Suppliers to recognize and respect workers' rights to freedom of association and collective bargaining. Suppliers must not intimidate, harass, or discriminate against workers in exercising their right to join or refrain from joining trade unions or similar external representative organizations.

4 Respect local communities.

Booking Holdings encourages Suppliers to bolster the well-being of their local communities through their business. Suppliers must respect the human rights of local communities, including legitimate representatives of impacted rights-holders, civil society groups, human rights defenders, and Indigenous people and their rights and title to property and land. Booking Holdings encourages Suppliers to meaningfully engage with rights-holders, to understand and observe the cultural and economic context in which they are working, to operate safely and responsibly, to be mindful of the well-being of communities, and to foster positive social and economic relationships with local communities.



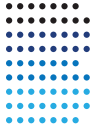


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Run a sustainable and ethical business.

Booking Holdings encourages Suppliers to recognize the importance of addressing environmental sustainability in their business and work to reduce the environmental impact of their operations where possible. Booking Holdings requires Suppliers and their subcontractors to comply with all applicable environmental regulations and encourages Suppliers to comply with industry-relevant environmental and sustainable business practice standards and assist Booking Holdings as appropriate to deliver on its sustainability ambitions by providing relevant environmental data or information.





Questions or concerns

Booking Holdings encourages a culture of transparency within our Suppliers and supply chain and encourages all to speak up with legal or ethical concerns, both through line management channels and/or [formal speak-up resources](#). If you have questions about this Supplier Code or believe that someone may have violated this Supplier Code, please contact the [Compliance Helpline](#). Booking Holdings expects Suppliers to raise concerns about suspected violations of this Supplier Code by the Supplier or its employees, subcontractors, agents, or Suppliers.

Where local law permits, you have the ability to raise your concerns anonymously. All concerns raised to Booking Holdings are duly reviewed and, if appropriate, investigated. Booking Holdings will not tolerate retaliation against any person who is trying to do the right thing by raising a concern. A person who raises a good faith concern about potential misconduct who experiences retaliation or other adverse action should report this immediately via the channel identified above.

Booking Holdings treats all questions and concerns seriously and in confidence. Depending on the nature and circumstances, Booking Holdings may seek to work with the Supplier and other affected parties in order to reach a proper and timely resolution.

Please Note: Booking Holdings reserves the right to modify this Supplier Code without prior notice.

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