Code of Conduct



BOOKING HOLDINGS

Our Code, Our Commitment



To our worldwide team, partners, and stakeholders,

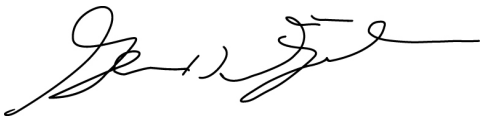
Our global business enhances the lives of millions of people every day. We are driven by our mission to **Make It Easier for Everyone to Experience the World**, and we are committed to accomplishing this by staying true to our values, which remain steadfast at their core, but evolve to accommodate an ever-changing world.

This year, I want to highlight the importance of our value, **The Sum Is Greater Than Our Parts** — lived through our commitment to working collaboratively across our brands and moving forward faster together. Whether our customers book their next trip or make a dinner reservation on one of our platforms, they can trust that we are listening and harnessing our collective talent across brands and regions, which gives us an innovative edge to help make every experience with us a great one. **This is also part of our collective commitment to our value of Absolute Integrity — a bond that unites us and is woven into everything we do**. This commitment is embodied in our Code of Conduct, which demands accountability for our actions and decisions.

Our Code is not just guidance on our legal and ethical standards. It is a compact: an understanding between you, me, and our community. Our Code tells you what you can expect of the Company and the people you work with — colleagues, partners, and stakeholders — and it tells you what the Company, the people you work with, and I expect of you. Each one of us is personally responsible for adhering to the Code. It applies to us all, and it applies at all times. Read it carefully to ensure that you understand what I am asking of you. If you ever have questions about our commitment to the Code, don't hesitate to ask.

It is important to me and our leadership team that you speak up if you see something that doesn't look right or if you need guidance. We pledge to provide you with a safe environment that promotes 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 culture of integrity and inclusion and consistently delivering *The Right Results, The Right Way*.



Glenn Fogel
President and Chief Executive Officer

Our Values



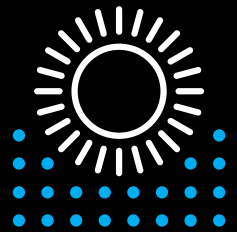
Experiences of Every Kind, For Everyone.

We believe that by making it easier for everyone to experience the world, we are doing our part to create a more connected and understanding world.



Absolute Integrity.

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



Relentless Innovation.

We are never satisfied with the status quo, and push to innovate every day.



Diversity Gives Us Strength.

We operate in over 220 countries and territories and 40+ languages, and believe that diverse ideas, people, and experiences contribute to our success.



The Sum is Greater Than Our Parts.

Our people are our strength. Together, we make it easier for everyone to experience the world.

THE RIGHT RESULTS THE RIGHT WAY

Booking Holdings is the world leader in online travel and services that support the entire travel journey. Our platforms — including Booking.com, Priceline, Agoda, KAYAK and OpenTable — utilize advanced AI, machine learning and other innovative technologies to simplify and personalize the travel experience for consumers and partners in over 220 countries and territories. Our mission is to make it easier for everyone to experience the world.

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



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 by 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 business. This Code also contains information on how to speak up and share concerns or obtain additional guidance when needed.

This Code is not intended to cover every issue or situation you may face. Instead, it is meant to be a guide in conjunction with our more detailed policies. If you are ever unsure how to handle a specific situation, **ask before acting.**

The Scope of Our Code

Our Code applies to all employees, officers, and directors of Booking Holdings or any of Booking Holdings' brand companies. This includes Booking.com, Priceline, Agoda, KAYAK, and OpenTable, as well as each of their subsidiaries (individually and collectively referred to as the "Company" or "Booking Holdings"). We also have a Supplier Code of Conduct for third parties that provide products or services to the Company.

Our Obligations

We are committed to operating with integrity, honesty, accountability, and in compliance with applicable laws where we do business. All of our employees, officers, and directors, wherever they are located, are expected to be familiar with and follow this Code. Achieving results through illegal or unethical means is unacceptable. We choose to grow our business the right way, even if it means walking away from opportunities that don't align with our values—**we would rather lose business than gain it improperly.**

The Board of Directors has adopted this Code to promote:

- Honest and ethical conduct
- Compliance with applicable laws and regulations
- The deterrence of wrongdoing

THE RIGHT RESULTS THE RIGHT WAY

Our ethical obligations as employees are to:

- Know this Code
- Make decisions consistent with this Code
- Be aware of and follow the laws and regulations of the jurisdictions where we (and you) do business
- Raise concerns of possible violations or conduct that is not consistent with this Code

...and it is your responsibility to complete your compliance training in a timely manner! It is an important part of our commitment to getting *The Right Results, The Right Way.*

If you are unsure, ask before acting!

Managers have additional responsibilities to:

- Serve as a role model by demonstrating integrity, ethical decision making, and compliance with this Code with your direct reports, both by example and by direction
- Foster and reward a culture of accountability and integrity
- Proactively identify, assess, and mitigate compliance and ethics risks within your team
- Ensure that appropriate compliance controls are implemented and operating within your department or team
- Encourage employees to speak up in good faith and promptly raise concerns brought to your attention through appropriate channels
- Observe and strictly enforce our zero-tolerance stance on retaliation

Which Law Applies?

We conduct business in more than 220 countries and territories around the world, meaning our operations are subject to the laws of many jurisdictions. The cross-border nature of e-commerce creates challenges, either where laws conflict or cultural expectations and perceptions differ by region. What is considered standard practice in one country may be perceived differently in another. If you encounter a conflict between applicable laws, or if a situation feels ethically inconsistent with local customs, consult the Compliance & Ethics or Legal Department for guidance.

THE RIGHT RESULTS THE RIGHT WAY



Click to enlarge



Speaking Up and Investigations

Making new friends! #discoveregypt #vagabondlife

GIZA, EGYPT

Speaking Up and Investigations

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 speak up.

Even if you do not have all the details, prompt concern raising 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 concern raising help to prevent further violations, it also helps to preserve evidence, and safeguard our employees, officers, directors, and the Company against further wrongdoing. As long as you reasonably believe that a violation has occurred, you are doing the right thing by speaking up.

We provide a number of ways to speak up and raise concerns so that you can select whatever avenue is most comfortable for you. Whichever option you select, your concern will be taken seriously and treated with sensitivity.

If you wish to raise a concern to the Audit Committee related to accounting, internal accounting controls, or auditing matters, please refer to the Audit Committee Procedures for Handling Helpline Complaints.

Speak Up Resources

- Your manager or supervisor
- Your Human Resources representative(s)
- Your Legal Department
- Your Compliance & Ethics Department
- The Booking Holdings Compliance & Ethics Department and Group Chief Compliance & Ethics Officer
- The Booking Holdings Legal Department and General Counsel
- The Compliance Helpline: bknghelpline.com

Other Resources

Our Ethics Ambassadors are fellow employees who raise awareness and provide guidance on compliance and ethics topics and promote our Code, policies, and values. If you are interested in becoming an Ethics Ambassador, speak with your Compliance & Ethics Department to learn more about the program.



The Compliance Helpline

The Compliance Helpline is a secure and independent (externally-operated) resource for raising concerns of wrongdoing or ethical misconduct.



Our Compliance Helpline offers:

- Confidential concern raising and the choice to remain anonymous
- Telephone and web-based reporting options in several 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 raise your concerns anonymously through the Compliance Helpline. That said, we encourage you to share your contact information so that we can reach out to you directly as needed. If you are willing to share your identity with us, we will treat your concern with the degree of confidentiality the situation permits, consistent with applicable law.

What Happens After I Raise a Concern?

We take concerns about actual or suspected misconduct seriously. When concerns are raised, we respond promptly and confidentially. We evaluate each report to determine the appropriate resolution. If an investigation is needed, we conduct our inquiries in a confidential, thorough, and objective manner. Employees are obligated to cooperate with a Company investigation and assist in its inquiries.

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

> Every report of suspected misconduct is met with a formal review to ensure our standards of integrity are upheld.

Our Non-Retaliation Stance

Employees who raise concerns of wrongdoing in good faith perform an important service to the Company. We do not tolerate retaliation in the form of an adverse employment decision (including termination, demotion, suspension, loss of benefits, threats, harassment, or discrimination) against anyone for raising a concern in good faith. "In good faith" means having a reasonable belief that misconduct has occurred.

We protect good-faith concern raisers from retaliation, and will take appropriate disciplinary action against anyone who retaliates against them. Conversely, any bad-faith concern raising could lead to disciplinary action.

For further information, please consult our Anti-Retaliation Policy.

Responding to Government Inquiries

We occasionally receive inquiries from government regulators and enforcement agencies. **To the extent required by 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, immediately contact your Compliance & Ethics or Legal Department.

Booking Holdings or 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.



Workplace Respect and Safety

"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

DRIVING THE PEAK DISTRICT NATIONAL PARK, ENGLAND

Diversity and Inclusion

Our employees drive our success and are fundamental in delivering on our mission to make it easier for everyone to experience the world. We believe in a work environment where employees have equal opportunities and are treated with respect and dignity. With colleagues in more than 60 countries, we respect and follow local customs and ways of doing business, provided they align with this Code and the law.

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.

We believe investing in people is a key element in our commitment to social responsibility. From flexible/hybrid working models to engagement programs, we facilitate activities and policies designed to bring our people together and support our international workforce.

> We believe that a diverse workforce operating in an inclusive environment has been a part of our success and will help us achieve our long-term strategic goals.

Workplace Safety

The health, safety, and well-being of our employees is of the utmost importance. We forbid all acts of violence and threatening behavior in the workplace. To the greatest extent permitted by applicable law, the possession of weapons, including knives and firearms, is prohibited on Company property and anywhere you are present as an employee of our Company, such as a Company-sponsored event or a conference. If we determine that an employee has acted violently or behaved in a threatening or inappropriate manner, appropriate disciplinary action will be taken, and law enforcement agencies may be contacted.

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. Please consult your Company's policies for further guidance on this topic.

We must also be familiar with and follow 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 raise any concerns of behavior or activity that jeopardizes the health or safety of employees or the workplace.
>
> If you feel that you or someone else is in immediate danger, you should call the local authorities or emergency services.

Online Safety and Content Regulation

Our core values are designed to foster safe and welcoming travel experiences for everyone. To maintain the safety of our travelers, supply partners, and the broader community, we operate in accordance with all applicable laws and regulations, including those governing online safety and content.

We are committed to protecting users from harm and taking appropriate measures to prevent our platforms from being used for illegal activities. You should raise any concerns or potential illegality to the Legal or Compliance & Ethics Department or through one of our other speak-up channels.

Workplace Conduct, Discrimination, and Harassment

Our employees 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.

Given the broad geographical nature of our business and workforce, we are committed to creating workplaces that embrace the cultures and practices of our employees and we prohibit unlawful discrimination of any type. We evaluate all employees and prospective employees on their merits and qualifications and never on an individual's protected characteristics.

Take Note

"**Discrimination**" occurs when individuals or groups are treated unfairly or denied equal opportunities regarding their employment—including hiring, pay, and benefits—based on protected characteristics.

We prohibit all forms of harassment, including emotional, physical, or sexual harassment. We do not tolerate bullying or the use of insulting, hurtful, threatening, or abusive comments.

We should all 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.

If you think that you have been harassed or discriminated against or observe this behavior, you should speak up. For more information on this topic, please refer to the Global Anti-Harassment and Anti-Discrimination Policy.

Take Note

"**Harassment**" is any form of unwanted verbal, non-verbal, or physical conduct that occurs with the purpose or effect of violating the dignity of a person.

"**Sexual Harassment**" includes unwelcome sexual advances, unsolicited sexual attention, demands or requests for sexual favors, sexual innuendos, or other unwelcome verbal or physical conduct of a sexual nature. It can be directed at anyone, regardless of gender, gender identification, sexual orientation, or other characteristics.

"**Bullying**" is offensive behavior through cruel, malicious, or humiliating attempts to undermine an individual or groups of employees.

Actions that may be considered harassment include:

- Offensive or inappropriate comments or jokes
- 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 texts
- Sexual advances or requests for sexual favors
- Racial or ethnic slurs



Environmental, Social, and Governance (ESG)

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

BLOWING KISS TO HOLGATE GLACIER, ALASKA

Sustainability

We are committed to operating a more sustainable and ethical global business and doing our part to ensure that there is a world worth experiencing. Our strong corporate governance practices and policies help us find the right solutions the right way—for each other, our communities, and the world around us.

More Sustainable Operations

Running our own operations more sustainably is a fundamental pillar of our sustainability strategy. We set clear and consistent expectations for our travel provider partners and operate our business according to the same standards. This includes reducing our operational footprint and managing unavoidable impacts efficiently. We strive to operate more sustainably and responsibly by leveraging our expertise and fostering meaningful collaboration.

More Sustainable Travel Options

More sustainable travel options can help support local economies, contribute to the preservation of cultural heritage, and promote the long-term health of destinations and ecosystems. Through product innovation, travel provider partner support, and industry collaboration, we are committed to enabling more sustainable travel options for customers worldwide.

Human Rights

We believe that the greatest and most positive human rights impact we can have is to make it easier for everyone to experience the world. As the world's leading provider of online travel and related services, we seek to avoid infringing on the rights of others and work to address adverse human rights impacts of our business.

We are committed to following all applicable laws and respecting human rights wherever we do business. We expect our employees, business partners, and customers to share this commitment, which is based on internationally recognized standards and principles, including the United Nations (UN) Guiding Principles on Business and Human Rights, and discussed in more detail in our Human Rights Statement.

Your Role In Respecting Human Rights

We regularly evaluate human rights-related risks and opportunities across our work and supply chain and seek to develop strategies to stop, prevent, or reduce these risks as needed. We expect you to respect human rights and raise any human rights concerns, without fear of retaliation, to the Compliance Helpline or another speak-up resource. To learn more about our commitment to respect human rights, please see our Human Rights Statement.





Anti-Bribery and Corruption

Bring on the lights! #northernlightsiceland #nightskychasers

NORTHERN LIGHTS, ICELAND

Prohibition of Bribery and Corruption

We conduct business around the world and seek to comply with all applicable international laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. These laws strictly prohibit bribes or kickbacks of any kind in connection with conducting our business.

We have a Global Anti-Bribery and Corruption Policy to provide you with further detail. The following principles, however, should serve as your guide:

Offering and Giving Improper Payments: You may not offer, give, or authorize anything of value (e.g., cash, gifts, entertainment, hospitality, favors) to a third party (including government officials and private parties) to obtain or retain business or gain any other advantage for the Company. This includes facilitating payments (sometimes called "expediting" payments), which are payments to secure or expedite routine governmental action. While these sorts of payments may be customary in some places, they are illegal in most countries, and they are always against our policy.

Requesting and Receiving Improper Payments: You are also prohibited from directly or indirectly requesting or receiving bribes from third parties.

You will not be reprimanded for refusing to pay or accept a bribe or kickback, regardless of any negative impact on revenue, sales, or other aspects of our business. The cost and damaging impact of bribery and corruption far outweigh any perceived short-term benefits. If you encounter such a situation, you should immediately raise the issue with your Compliance & Ethics Department.

Violations of anti-bribery laws are very serious and can lead to significant civil penalties and damage awards, as well as fines and imprisonment in criminal proceedings for any employees, officers, or directors involved.

We have zero tolerance for any form of bribery or corruption.

Take Note

A **"Bribe"** is anything of value offered, given, received, or accepted to influence or reward a decision or action.

A **"Kickback"** is the returning or "kicking back" of anything of value as a "thank you" for influencing a business decision or deal.

A **"government official"** includes the following:

- Any person acting in an official capacity on behalf of a national, state, or local government agency, department, or regulatory authority (e.g., members of parliament, police officers, tax authorities, customs inspectors)
- An employee of state- or government-owned or controlled enterprises (e.g., national airlines, government-owned hotels)
- A candidate for political office or any political party or representative
- An employee or representative of a quasi-public international organization (e.g., United Nations, Red Cross, FIFA Committee, World Bank)

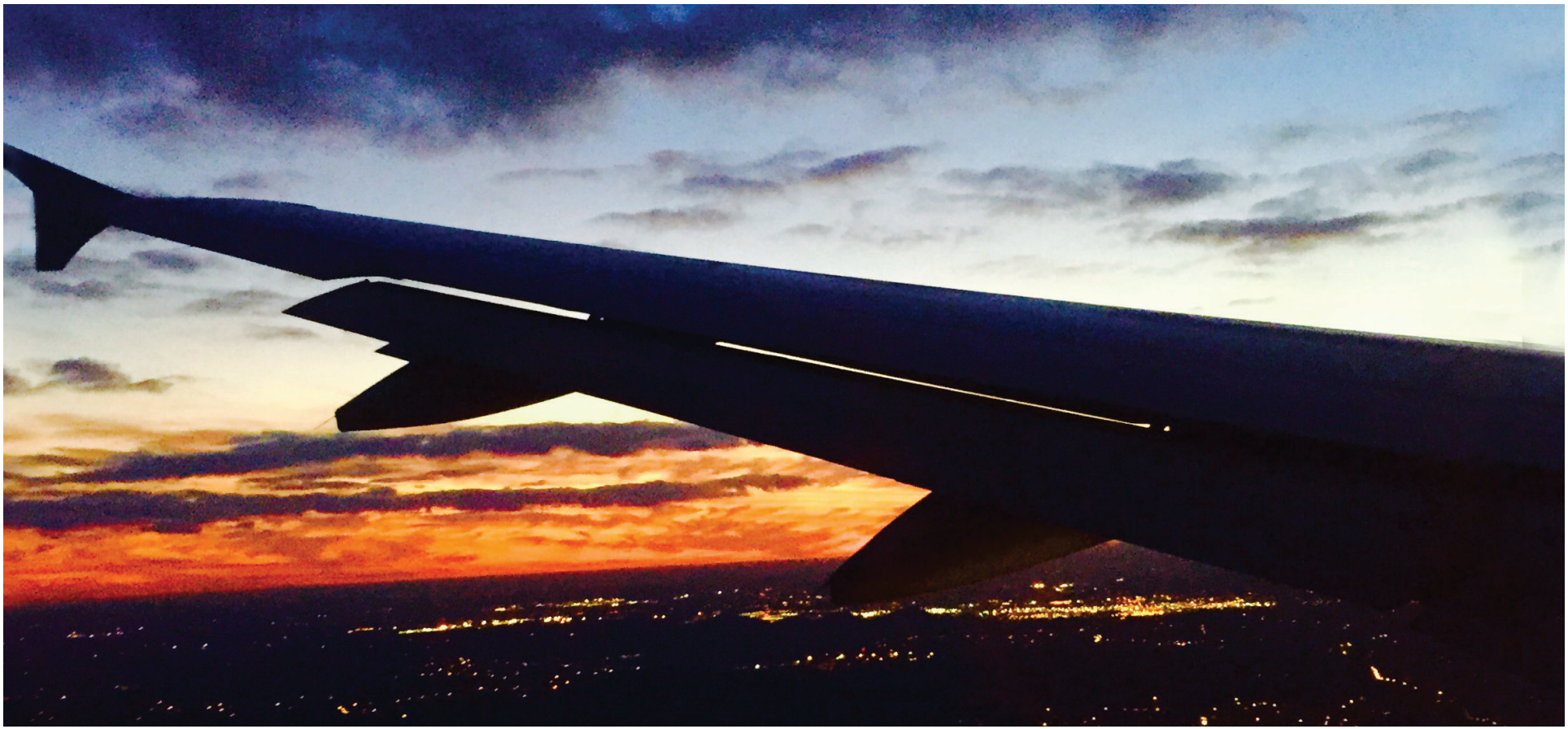
You may not use personal funds to accomplish what is otherwise prohibited by this and other Company policies.

Dealing With Third Parties

Anti-bribery laws also prohibit us from using third parties to make corrupt payments on our behalf. The Company can be responsible for these payments where we knew or should have known that the payments would be made.

It is therefore imperative that all third parties who act on our behalf understand that they are strictly prohibited from paying or receiving any bribes or kickbacks (including facilitating payments). As such, all third parties working for or on behalf of the Company must undergo appropriate due diligence and be made aware of our expectation that they follow relevant anti-bribery laws. Please work with your Compliance & Ethics Department to ensure that our third parties are appropriately vetted.

Due to the complex laws in this area, please refer to the Global Anti-Bribery and Corruption Policy and contact your Compliance & Ethics Department with questions or concerns.





Financial Integrity and Reporting

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

YI PENG FESTIVAL, CHIANG MAI THAILAND

Fraud Prevention and Reporting

Our business success depends on acting honestly, transparently, and in accordance with applicable laws and regulations.

Fraud means any dishonest or deceptive act to obtain financial or personal gain or some other unfair advantage. Examples of fraud include intentionally changing financial or business records, misappropriating or misusing Company funds or assets, submitting false or inflated business expenses, or failing to disclose information where required by law, regulation, or Company policy. The Company has internal controls and processes to prevent, detect, and respond to fraud. It is our responsibility to comply with these procedures, remain vigilant, and promptly raise any concerns through appropriate reporting channels.

Financial Reporting and Disclosure

As a publicly-listed company, we are required to make 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. Filings with the U.S. Securities and Exchange Commission (SEC) must be complete, timely, and in full compliance with SEC requirements.

Potential violations of these requirements could result in liability for the Company and, in certain cases, our officers, directors, or employees. They could also cause our investors, analysts, and others to lose confidence in the Company.

Additional Responsibilities for Directors, Officers, and Employees Involved in Disclosure Matters

Each director, officer, or employee involved in the Company's disclosure process must be familiar with and comply with the Company's disclosure controls and requirements, as well as internal controls over financial reporting, as relevant to their area of responsibility.

If you are involved in the Company's disclosure process, you must also:

- Be familiar with the Company's business and financial operations;
- Never knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, including our independent auditors, government regulators, and self-regulatory organizations; and
- Properly review and critically analyze proposed disclosures for accuracy and completeness (or, where appropriate, delegate this task to others).

In addition, if you have direct or supervisory authority over our SEC filings, or any of the Company's public financial communications, you should take all appropriate steps, including consulting with our other Company officers, to ensure full, fair, accurate, timely, and understandable disclosures.

Accurate Books and Records

We all have a responsibility to create and maintain accurate business records and communications. The Company's books and records must accurately and fairly reflect transactions in a timely manner and in reasonable detail. False, misleading, incomplete, inaccurate, or artificial entries in our books and records are prohibited. No undisclosed or unrecorded accounts may be established for any purpose, and you must obtain sufficient documentation supporting the transactions with which you are involved.

> The Company makes important business decisions based on our books and records and their accuracy is vital.

Internal Controls

We are all responsible for maintaining adequate and effective internal controls that are not circumvented. The Company is responsible for designing and adhering to a system of internal controls that provides reasonable assurance that:

- Each transaction has been processed on time in accordance with generally accepted accounting principles (GAAP) or other applicable principles;
- Each transaction has been approved by management and properly recorded so that the Company can account for its assets and liabilities and prepare its financial statements;
- Company assets are appropriately protected and used only as approved by management.

Take Note

"**Books and records**" includes all of our documents — whether on paper or digital — that show our business activities, assets, or transactions.

Common examples of "books and records" include:

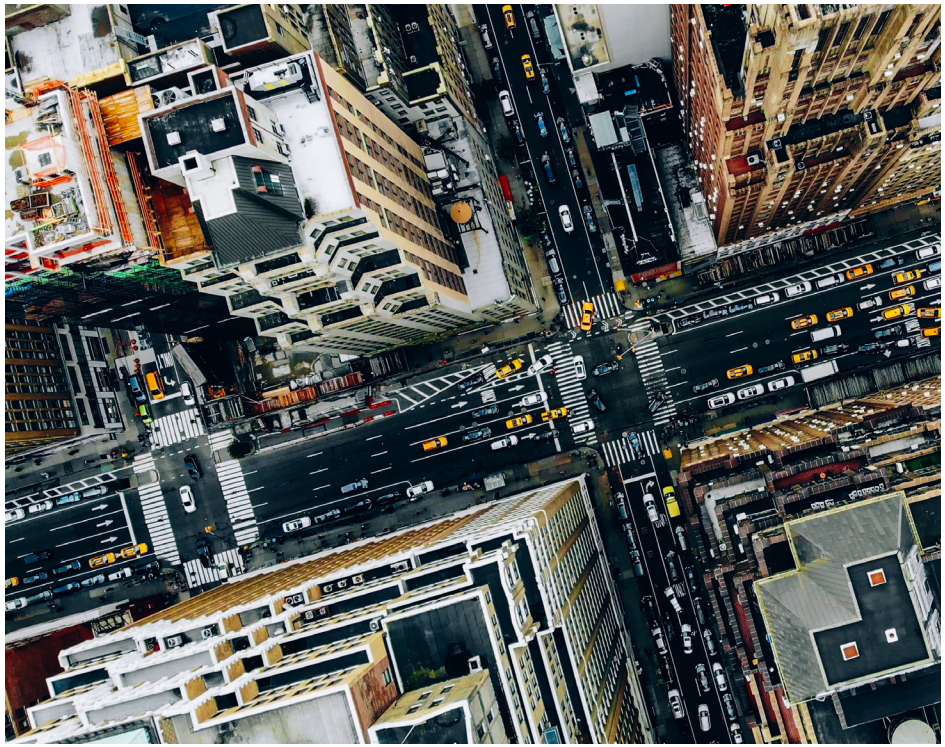
- Expense reports
- Invoices
- Time records
- Financial reports
- Personnel files
- Business plans
- Contracts
- Customer lists

THE RIGHT RESULTS THE RIGHT WAY

If you are asked to prepare, submit, or approve a contract, payment, or any other Company document that does not accurately reflect the transaction, you should refuse to do so and immediately raise your concern.

Similarly, you must never request that a third party submit a record that does not accurately reflect the transaction.

If you suspect others may be either inadvertently or intentionally circumventing our internal controls, you should immediately raise your concern.





Gifts, Entertainment, and Conflicts of Interest

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

SIGHTSEEING, JAPAN

Gifts and Entertainment

Giving and receiving gifts and 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 your business judgment or the integrity of the Company's business relationships.

When exchanging gifts or entertainment with third parties who have or seek a business relationship with the Company, you must do so in accordance with the law, our ethical standards, and our Gifts and Entertainment Policy.

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, give, or accept any gifts or entertainment to or from a government official without prior written approval from your Compliance & Ethics Department.

For further information, guidance, and exceptions, please consult our Gifts and Entertainment Policy.

Conflicts of Interest

We all have a responsibility to avoid conflicts of interest, which arise whenever our personal, social, or financial interests interfere, or even appear to interfere, with the interests of the Company. If you encounter a situation that appears to present a perceived, potential, or actual conflict, you should complete a Conflict of Interest Disclosure Form. For further information, definitions, and guidance, please consult our Conflicts of Interest Policy.

Below are some common examples of conflicts of interest:

Outside Employment and Other Personal Activities

You may not engage in outside employment (e.g., traditional second jobs, self-employment, business ownership or start-ups, professional, advisory, or consulting services, gigs) or other personal activities that could interfere with your ability to objectively and competently do your job. These activities could interfere with your ability to act in the Company's best interests, especially if the outside work is with a competitor or supplier or if the hours overlap with your workday.

Corporate Opportunities

You may not take (or direct to a third party) a business opportunity that you discover through the use of corporate property, information, or position without prior written approval from your Compliance & Ethics Department.

Outside Board Service or Other Affiliations

You may not serve on a managing, advisory, or supervisory board of directors (or any similar authority or body) of any competitor or supplier without prior written approval from the Group Chief Compliance & Ethics Officer or their delegate.

Significant Financial Interests in Competitors or Suppliers

You may not hold a Significant Financial Interest in a competitor or supplier without prior written approval from the Group Chief Compliance & Ethics Officer or their delegate.

Family and Personal Relationships

Employee Relationships

It is a conflict of interest if a family member or someone with whom you have a personal relationship is in your reporting chain of command or either of you has the ability to review or influence the other person's employment status, pay, benefits, performance evaluation, or any other work condition.

Take Note

"**Family Member**" is defined as:

- Any relative (spouse, child, parent, sibling, cousin, nephew/niece, aunt/uncle, grandparent, or grandchild) by birth, adoption, marriage, domestic partnership, or civil union, as well as any current member of your immediate household, regardless of whether you are related.

"**Personal Relationship**" is defined as:

- Romantic and/or sexual relationship; or
- Other close personal friendship or relationship that rises to the level or gives the appearance of being able to influence the employee's objectivity (e.g., financial relationships such as landlord/tenant, close friends in whom you confide or with whom you regularly socialize outside of work, etc.).

Relationships With Suppliers and Competitors

It is a conflict of interest to participate in, seek to influence, or derive personal benefit from business decisions related to a competitor or supplier if your family member or someone with whom you have a personal relationship works for, or derives benefit from, the competitor or supplier.

It is our expectation that you will take personal responsibility to ensure that your relationships do not disrupt or negatively impact the workplace.

Political and Charitable Activities

You 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. Additionally, you must participate in political or charitable activities as private citizens, not as representatives of the Company.

The Company may engage in public policy issues pertinent to the Company's interests. The Company does not typically make political contributions, but any contributions would require the approval of the Corporate Governance Committee of the Board of Directors and would be in compliance with the law and internal policies.

We abide by all lobbying laws and may engage employees or external parties to represent our interests with government officials. You are prohibited from participating in any lobbying activities on behalf of the Company without specific authorization from Booking Holdings' General Counsel.

THE RIGHT RESULTS THE RIGHT WAY

If you find it difficult to make a fair and impartial business decision on behalf of the Company because of competing personal interests, or if you otherwise become aware of a situation that may present a conflict of interest, please complete a Conflict of Interest Disclosure Form. In many cases, the conflict can be resolved or mitigated through simple steps.



Fair Competition

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

VIRGIN GORDA, BRITISH VIRGIN ISLANDS

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.

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

- Set, coordinate, or control prices
- Manipulate a bidding process
- Limit competition against other market participants
- Divide or allocate markets, territories, or customers
- Share competitive information with a competitor, such as unpublished information related to prices, profits, or profit margins

> Employees should also be cautious not to facilitate or otherwise help competitors coordinate with one another (often called a "hub-and-spoke" arrangement).

Although the spirit of these competition laws is straightforward, their application can be complex. In many jurisdictions, including the U.S. and the EU, violations of competition laws can lead to significant civil penalties and damage awards, as well as fines and imprisonment in criminal proceedings. If you have any questions about how these laws apply to a particular situation, please consult our Global Competition Law Policy and Guidelines and seek advice from your Legal Department before taking action.

> We are committed to competing fairly and honestly in the marketplace.

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 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 accurate and not misleading or deceptive.

Learning about our competitors 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. Non-public information can include information about a competitor's products, services, markets, pricing, trade secrets, or business plans. If you have any questions, consult your Legal Department.

Be mindful of the following:

- Information obtained by unethical means, including eavesdropping or the unintended receipt of an email
- 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



Financial Crime

Andiamo! #railwayheart #stazione #trainspotting

ROMA TERMINI RAILWAY STATION, ITALY

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

We are committed to following all applicable laws and regulations that combat financial crime in all of its forms, including tax evasion, money laundering, and terrorist financing. **Tax evasion** is not paying or deliberately underpaying taxes by hiding income or information from tax authorities. **Money laundering** is the process by which the proceeds of criminal activity are concealed or disguised from their illicit criminal origins, hiding illegal funds or making them look like they are legitimate. **Terrorist financing** is any activity that includes raising, storing, and moving funds obtained generally through legal means, but sometimes illegal means, to provide financing or financial support to individual terrorists or terrorist groups for the purpose of committing acts of terrorism.

We must take steps to make sure that we only do business with reputable third parties who do legitimate business and earn their money legally. **We must never participate in a transaction or activity that could appear to conceal illegal conduct or money**.

In addition to fulfilling our own tax obligations, we must never help another party not pay taxes they owe (e.g., 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).

THE RIGHT RESULTS THE RIGHT WAY

Be alert for attempts to make or request any of the following payments:

- In currencies other than those specified in the invoice, contract, or jurisdiction where the services are performed
- To or from countries with no apparent connection to the business
- In cash or cash equivalents
- To or from someone not part of 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 with a clear description of services

If you encounter any of these red flags or have any concerns about suspicious transactions or activities, you should raise the issue to your manager or your Legal or Compliance & Ethics Department.

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

Sanctions & Restricted Territories and Parties

We are committed to complying with applicable embargoes and economic sanctions, including those maintained by the U.S., EU, UN, the Netherlands, Singapore, the UK, and any other local law governing Sanctions and Export Controls in the jurisdictions where we operate. These laws, which prohibit dealings with restricted territories, governments, businesses, and individuals, can lead to issues in our relationships with vendors, suppliers, other business partners, and customers. For further guidance on allowable activities, you should consult your Legal or Compliance & Ethics Department or our Sanctions and Export Controls Policy.

Imports, Exports, and Boycotts

If your job involves sending or receiving goods, such as information technology equipment, software, or promotional materials, across national borders, you have an obligation to learn and understand the applicable import and export laws (particularly with respect to dual use or military goods). These laws apply to transfers within and among our brand companies as well as to transfers with third parties, such as vendors, licensors, and suppliers. For further guidance, you should consult your Legal or Compliance & Ethics Department or our Sanctions and Export Controls Policy.

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

THE RIGHT RESULTS THE RIGHT WAY

Violations of sanctions or export control restrictions can lead to significant civil penalties and damage awards, as well as fines and imprisonment in criminal proceedings for any employees, officers, and directors involved.

Sanctions and export control laws can be complex and difficult to navigate. If you work in a department that deals with these issues, you must consult your Legal or Compliance & Ethics Department before making decisions that could violate applicable laws.

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





Insider Trading

No place I'd rather be #winterwonderland

CANADA

Insider Trading

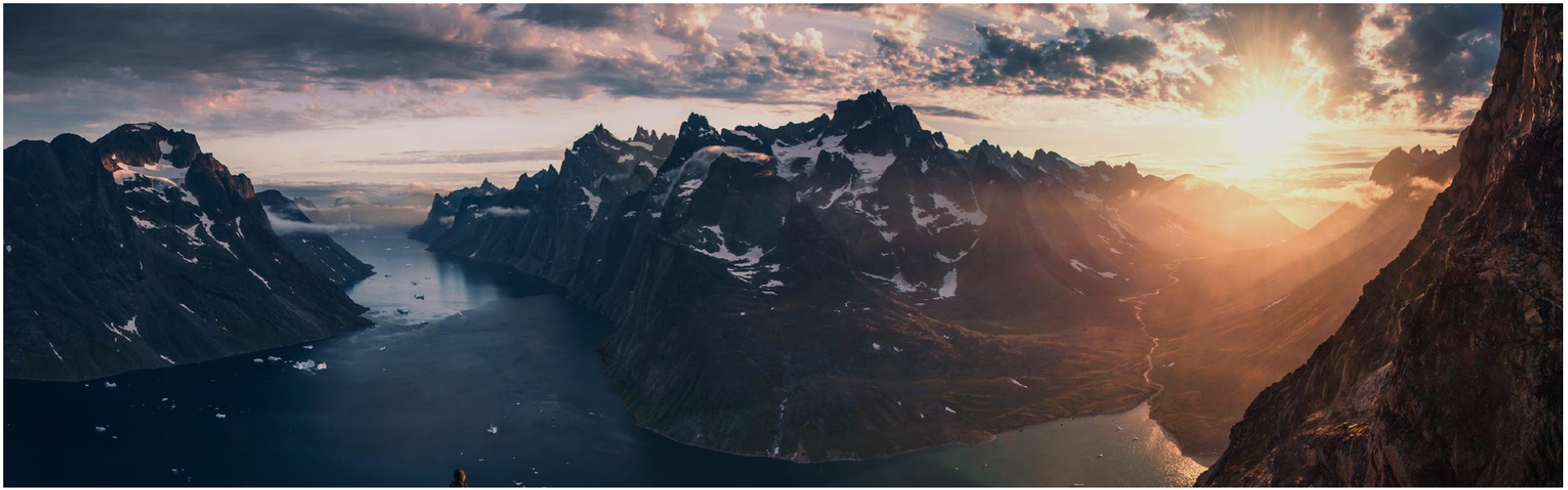
We strictly prohibit insider trading. Insider trading laws prohibit insiders at a company from purchasing or selling securities of that company while in possession of material non-public information about that company. The laws also prohibit "tipping" (disclosing material non-public information or making trading recommendations to others, who then trade or otherwise profit from that disclosure).

You must use caution and should never disclose confidential Company information that may be in your possession unless authorized to do so. You may not participate in prediction markets or similar platforms to bet, wager, or establish positions in event contracts or similar instruments if the transaction relates to the Company, or to confidential information about a third party obtained through your employment.

Material information is information that may have or is likely to have a significant effect on the price of securities or that a reasonable person would consider important in making an investment decision, including:

- Price-sensitive, business-sensitive, or competition-sensitive information
- Unannounced financial results
- Significant new or lost contracts
- Changes in management
- Government investigations or dawn raids
- Pending lawsuits or legal settlements
- Potential mergers, acquisitions, or divestments
- Significant new products or offerings

The stakes in this area are high. Violations could lead to significant fines, penalties, and imprisonment. Consult your Legal Department if you have any questions and always refer to our Insider Trading Policy before purchasing or selling Company securities.





Privacy and Data Security

Today is a good mood. #cafeparisien #sundaymorningmood

CAFE, PARIS

Privacy and Data Security

We collect, use, and process personal data in the course of doing business, including information relating to customers, employees, business partners, and other individuals. We are committed to protecting all personal data entrusted to us and handling it responsibly, securely, and in accordance with applicable privacy and data security laws and our Protecting Personal Data Policy and Global Information Security Policy.

Everyone who handles personal data on behalf of the Company must maintain the privacy, security, and confidentiality of all personal data and must:

- Collect and use personal data only for the purposes for which it was collected and as described in our Privacy Notices.
- Access personal data only when authorized and only as necessary to perform your role.
- Protect personal data against unauthorized access, disclosure, or loss.
- Store, transmit, and dispose of personal data securely and in accordance with our policies.
- Take extra care when handling personal data relating to colleagues or others you work with directly, recognizing its sensitivity and the trust involved.

Raising Concerns is Everyone's Responsibility

Protecting personal data requires vigilance from all of us. If you become aware of or suspect a data incident, misuse of personal data, or a security risk, you must promptly report it. Speaking up quickly helps us protect individuals, reduce harm, and meet our legal and ethical obligations.

Our Privacy Principles

Our approach to privacy is guided by the following principles:

1. **Transparency.** We are open and honest about how we collect and use information.
2. **Embedded Privacy.** From the very first idea to the final launch, we design our products with privacy at the core.
3. **Control.** We make it simple for people to understand and manage how their information is used.
4. **Security.** We use strong protections and constant vigilance to keep data safe.
5. **Purpose.** We only gather what we need, use it responsibly, and stick to our promises.
6. **Accountability.** We take responsibility for doing the right thing—not just because we have to, but because it builds trust.

If you have any questions on this topic, please consult the Global Information Security Policy, any applicable Data Security Policy and standard at your brand, or contact your manager, Privacy Officer, or Information Security Officer.



Protection of Company Assets

Celebrating every day! #carnival #colorfullife #carnivalbrasileiro

CARNIVAL, BRAZIL

Protection of Company Assets

We must all protect Company assets and ensure their efficient use.

Physical Assets

You should use Company assets responsibly and avoid their waste, misuse, or theft. In general, Company property, equipment, and time should be used for business purposes and in accordance with our policies. While Company assets are intended for legitimate business purposes, we generally allow employees the reasonable, limited, personal use of electronic resources, including phones, computers, Internet connections, voicemail, and email, as long as such use is consistent with this Code and other Company policies.

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

Confidential and Proprietary Information

Our obligation to safeguard Company assets includes protecting confidential and proprietary Company information, including intellectual property (e.g., software code, patents, trade secrets, business plans, copyrights, and trademarks). This includes protecting such information from unauthorized access, disclosure, or use, whether intentional or accidental.

The unauthorized or improper release of this information could negatively impact the Company's future success. You should therefore never disclose this information without proper authorization from your Legal Department and a nondisclosure agreement, as needed. Your obligation to maintain the confidentiality of this information continues even after your employment at the Company ends.

Respecting The Intellectual Property of Others

We respect the intellectual property rights of third parties and do not intentionally infringe or improperly use others' intellectual property. In many cases, if we want to use the intellectual property of another person or company (including images or content available on the Internet), 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 (including Open Source licenses), we must follow any limitations included in the license and any usage guidelines or other restrictions. Consult your Legal Department with questions.

Records Management

All Company records should be maintained and destroyed in accordance with applicable record retention policies. In the event that you receive a document hold notice related to litigation or an investigation, you must refrain from deleting any relevant documents as instructed in the hold notice and consult your Legal Department before deleting or destroying any Company records relevant to the hold notice. If you have questions on the appropriate handling and disposal of Company records, consult your manager or Legal Department.

> Never destroy records to conceal potential wrongdoing or hinder an investigation.



Social Media and Communications

Airport hellos and goodbyes. #travelgram #airportlife

FAMILY, AIRPORT

Social Media

You must exercise sound judgment when posting anywhere on the Internet in a way that could impact the Company. All posts must comply with this Code and not harm the Company's reputation or legitimate business interests. In general, you should not post about sensitive Company business matters, such as our performance, strategy, reputation, or other business interests, unless you are an official Company spokesperson and authorized to do so. You also should not disclose proprietary, confidential, or non-public Company information.

Personal Use

Because we respect your right to privacy, we usually do not take an interest in your personal social media use unless it negatively impacts the workplace, other employees, the third parties with whom we do business, your job performance, or the Company's reputation or legitimate business interests. Anything you post that could potentially affect the Company or its reputation will ultimately be your responsibility. When you engage in personal social media use, do so properly, exercising sound judgment. Please refer to the Global Social Media Policy and Guidelines for further detail.

Internal Communications

We recognize the value of internal communication platforms in operating our business effectively and efficiently. All workplace communications must be conducted on Company-provided platforms and applications and follow the principles of this Code and other relevant Company policies. For further details on the acceptable use of messaging applications for internal written communications, please consult our Workplace Use of Messaging Applications Policy - Personnel Communications.

Communications With The Public, Investors, and The Media

As a public company, we must communicate in a coordinated, coherent manner consistent with our strategic goals and standards set by regulatory bodies, including the U.S. Securities and Exchange Commission. As a result, we have designated spokespersons to speak for and on behalf of the Company under the guidance of the Communications Department, and unauthorized employees must refrain from doing so. All requests for public communications (including external speaking engagements, media inquiries, requests for interviews, case studies, or other use of the Booking Holdings brand) from third parties, including partners, vendors, media, or otherwise should be referred to your Communications Department immediately. For further detail, please consult our Global Communications Policy and Guidelines.





Conclusion

A successful day of sightseeing! #belgiumtrip #livetotravel

CAFE, BELGIUM

Compliance & Ethics Program

We embed compliance and ethics in everything we do to allow us to achieve our mission to make it easier for everyone to experience the world. We set expectations for compliance and ethics through our Legal & Compliance risk assessment, policies and procedures, education and awareness initiatives, and other employee resources designed to uphold ethical conduct and accountability. We must all work together to ensure compliance with the letter and spirit of this Code, promote ethical and legal behavior, and make sure we always achieve *The Right Results, The Right Way*.

Always remember to:

- Refer to available Company resources, such as other Company policies
- Speak up and promptly raise concerns if you become aware of any suspected violations of this Code or applicable law, regulation, or Company policy
- Foster a culture of integrity by modeling ethical behavior and holding one another accountable
- **When in doubt, ask before acting!**

We are committed to fostering an environment where employees feel comfortable speaking up. We have a zero-tolerance stance prohibiting retaliation against anyone who raises a concern in good faith.

Waiver/Conflict With Other Policies

There may be rare circumstances when an exception must be made to this Code. In these limited instances, the Group Chief Compliance & Ethics Officer may grant a waiver. Only the Board of Directors, however, may waive a provision of this Code for one of Booking Holdings' named executive officers. We will promptly disclose any such waivers as required by law.

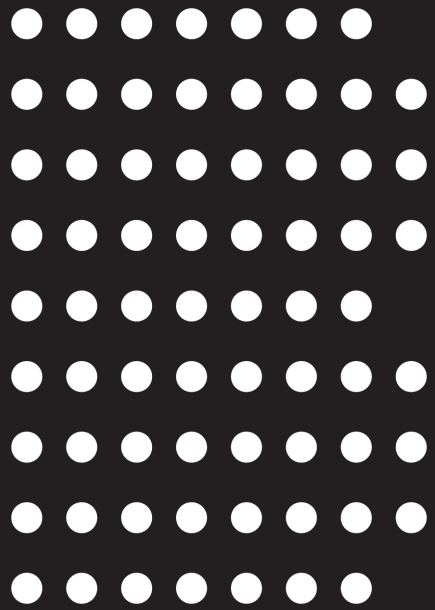
If there is a conflict between this Code and other Company policies, this Code shall prevail. Your Compliance & Ethics or Legal Department has primary authority to interpret how this Code applies, with review from the Group Chief Compliance & Ethics Officer or Booking Holdings General Counsel. Ultimate authority for the interpretation of this 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 this 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 October 15, 2026.



Our vision is to have a best-in-class compliance and ethics program that contributes to the sustainable growth of our business and lives up to our compliance and ethics guiding principle —*The Right Results, The Right Way*.



BOOKING HOLDINGS