



BOOKING HOLDINGS



Supplier Code of Conduct

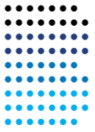
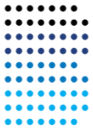


Table of Contents

- 03 Introduction
- 04 Fundamental Principles
- 05 The Principles Explained
- 10 Questions
- 11 Appendix





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 an incredible 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 take all measures to reduce risk to our business by respecting all applicable

laws, observing the highest ethical standards, and by meeting or exceeding the requirements established in the Supplier Code of Conduct.

Applicability.

This Code applies to Suppliers, defined as businesses and independent contractors that provide products or services to Booking Holdings. It also applies to all individuals employed by the 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 and its subsidiaries. We require all of our Suppliers to acknowledge and abide by the principles of this Code and to ensure that their next tier of subcontractors and agents abide by the Code as well.

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 of Conduct and to take appropriate steps to

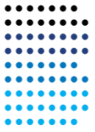
ensure that your organization and your own subcontractors and agents comply with the fundamental principles of this Supplier Code of Conduct.

Accountability.

This Code is based on international standards, principles and conventions, as well as our Booking Holdings Code of Conduct. The specific requirements set out in this Code are the minimum standards for our Suppliers. We encourage you to go beyond these standards, particularly where local laws and regulations are either weak or seldom enforced.

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

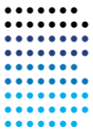




The fundamental principles of our Supplier Code

1. Conduct business lawfully and with integrity.
2. Treat employees with dignity and respect.
3. Protect human rights.
4. Respect local communities.
5. Environmental sustainability.





The principles explained

1

Conduct business lawfully and with integrity.

Compliance with Laws.

Suppliers will 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.

Suppliers will conduct business in an honest and ethical manner.

Bribery and Corruption.

Booking Holdings has zero-tolerance for any and all forms of bribery, corruption, extortion, or embezzlement.

Booking Holdings strictly prohibits corruption, bribery, kickbacks, fraud, theft, extortion, and embezzlement of any kind. All of Booking Holdings' Suppliers must comply with all applicable anti-bribery laws and

maintain accurate books and records that correctly reflect their transactions and contain no false or misleading information. Suppliers will not give to, offer to give to, request from, or agree to accept money or anything of value from anyone, directly or indirectly through another party, to gain an improper advantage related to Booking Holdings.

Conflicts of Interest.

Booking Holdings expects Suppliers to disclose any and all conflicts of interest in any business dealings with Booking Holdings. A "conflict of interest" means any circumstance - potential, actual, or perceived - that might cause a party to prioritize their financial or personal interests or might cause that party to be biased in their business judgments, decisions, or actions. Suppliers must avoid all conflicts of interest that may adversely influence business relationships. 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.

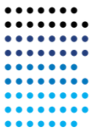
Gifts and Entertainment.

Booking Holdings strongly discourages gift-giving, however, we appreciate that in limited instances, gift-giving (of nominal value) may be customary in some countries and cultures to maintain business relations. Gift-giving should occur sparingly and always be legitimate and aligned with the Booking Holdings Code of Conduct and Global Gifts and Entertainment Policy. In no instances shall Suppliers accept from or offer to Booking Holdings employees any cash or cash equivalent gifts.

Any business entertainment or hospitality with Booking Holdings must be kept reasonable in nature, entirely for the purpose of maintaining good business relations and not intended to influence in any way Booking Holdings' decisions about how Booking Holdings awards future business.

Any gifts, entertainment, or hospitality must always be of nominal value and, regardless of amount, never received or offered during contract negotiation, bidding, tender, or award.





Confidential and Competitor Information.

Booking Holdings expects Suppliers to obtain and use all 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 its competitors obtained illegally and unethically. 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 information, know-how, and intellectual property must be respected and safeguarded.

Any and all personal information about individuals, such as Booking Holdings' consumers or employees, must be handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations. All information provided by Booking Holdings that is not in the public domain is deemed confidential and it is only used for its intended and designated purpose.

Booking Holdings expects Suppliers not to misuse or misappropriate Booking Holdings' physical assets 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 respect the intellectual property rights of all third parties. Booking Holdings expects Suppliers to take all actions to ensure Suppliers do not infringe the intellectual property rights of any third party, including Booking Holdings or its affiliates.

Financial Records, Money Laundering and Insider Trading.

All business and commercial dealings are transparently performed and accurately recorded in the Supplier's books and records. Suppliers will not falsify records or misrepresent conditions or practices. There is no actual or attempted participation in financial crime, tax evasion, facilitation of tax evasion, and money laundering and Suppliers will take steps to prevent financial transactions from being used by others to launder money or evade or facilitate the evasion of taxes.

No confidential information in the Supplier's possession regarding Booking Holdings or its affiliates is used to either engage in or support insider trading. Suppliers are expected to comply with Booking Holdings' [Insider Trading Policy](#).

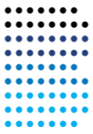
Anti-Facilitation of Tax Evasion.

Booking Holdings has a zero-tolerance policy towards tax evasion or facilitation of tax evasion.

We are fully committed to complying with all legislation, regulation, and applicable guidelines designed to prevent tax evasion and the facilitation of tax evasion wherever we, our clients, our Suppliers, and our business partners operate.

At all times, business is to be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented. Furthermore, any individual or an incorporated or unincorporated body who performs services for or on behalf of our organization must not undertake any transactions which: causes Booking Holdings and/or its subsidiaries to commit a tax evasion offense; or facilitate tax evasion offenses by a third party, who is not a person associated with Booking Holdings.





Sanctions.

Suppliers must comply with applicable embargoes and trade sanctions, including the restrictions maintained by the US, EU, UN, and the UK (or other applicable laws). These laws prohibit dealings with restricted countries, governments, businesses, and individuals.

Public Affairs.

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

Suppliers must be authorized by Booking Holdings to participate in any consulting 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 public employee, official, or to a family member of the employee or official to influence government decisions is prohibited; likewise, lobbyists, subordinates of lobbyists, or principals shall not solicit or receive anything of value from public officials.

Reporting Concerns and Non-retaliation.

All workers (whether directly employed or not) are provided with means by which to raise their concerns about any of these requirements or, alternatively, are informed on how to raise a concern via the [Compliance Helpline](#) (see section "Questions or Concerns"). Processes are in place to ensure that workers who raise concerns and speak up in good faith are protected from retaliation.

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 are treated with respect and dignity. No worker is subject to any threats, bullying, or unlawful 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

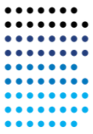
activities on the basis of that person or group of people's personal characteristics or attributes. As an example, discrimination includes, but is not limited to, hiring and employment policies or practices that discriminate against a person or group of people on the basis of their sexual orientation or gender identity, *even if such policies and practices are permitted under applicable law.*

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

Diversity and Inclusion.

Booking Holdings expects Suppliers to create a work environment where all individuals have equal opportunities and are treated with dignity and respect. Booking Holdings encourages Suppliers to seek to create an equally diverse and global workforce, and to expect their employees to embrace norms that support an inclusive culture, workplace, and community.





3 Protect 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.

Work is conducted on a voluntary basis.

Under no circumstances should a Supplier use forced labor, whether in the form of compulsory or trafficked labor, bonded labor, indentured labor, or other forms. Mental and physical coercion, slavery, and human trafficking are prohibited.

All workers are of an appropriate age.

Under no circumstances should a Supplier employ individuals under the local legal minimum age for work or mandatory schooling. When young workers are employed they must not do work that is mentally, physically, socially, or morally dangerous or harmful or interferes with their schooling by depriving them of the opportunity to attend school.

Wage and working hours are reasonable.

All workers are paid fair wages which meet or exceed the legal minimum standards or appropriate prevailing industry standards, whichever is higher.

Other than legally mandated deductions, all other deductions from wages must be made only with the express and written consent of the workers concerned and in compliance with applicable laws and international human rights standards.

Working hours for all workers are reasonable, and workers are not required to work more than the regular and overtime hours allowed by the law of the country where the workers are employed. All overtime work by workers is on a voluntary basis and compensated in line with relevant regulations.

All workers' health and safety are protected at work.

Booking Holdings expects all Suppliers to provide their employees with a healthy and safe workplace, as per local health and safety laws and regulations, to prevent

accidents and injury arising out of, linked with, or occurring in the course of work or as a result of the Supplier/employer's operations.

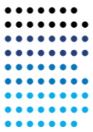
Work is conducted on the basis of freely agreed and documented terms of employment.

All workers - whether permanent, fixed-term, or casual - are provided with employment documents that are freely agreed to and respect employees' legal and contractual rights.

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

The rights of workers to freedom of association and collective bargaining are recognized and respected. Workers are not intimidated or harassed in the exercise of their right to join or refrain from joining any organization.





4 Respect local communities.

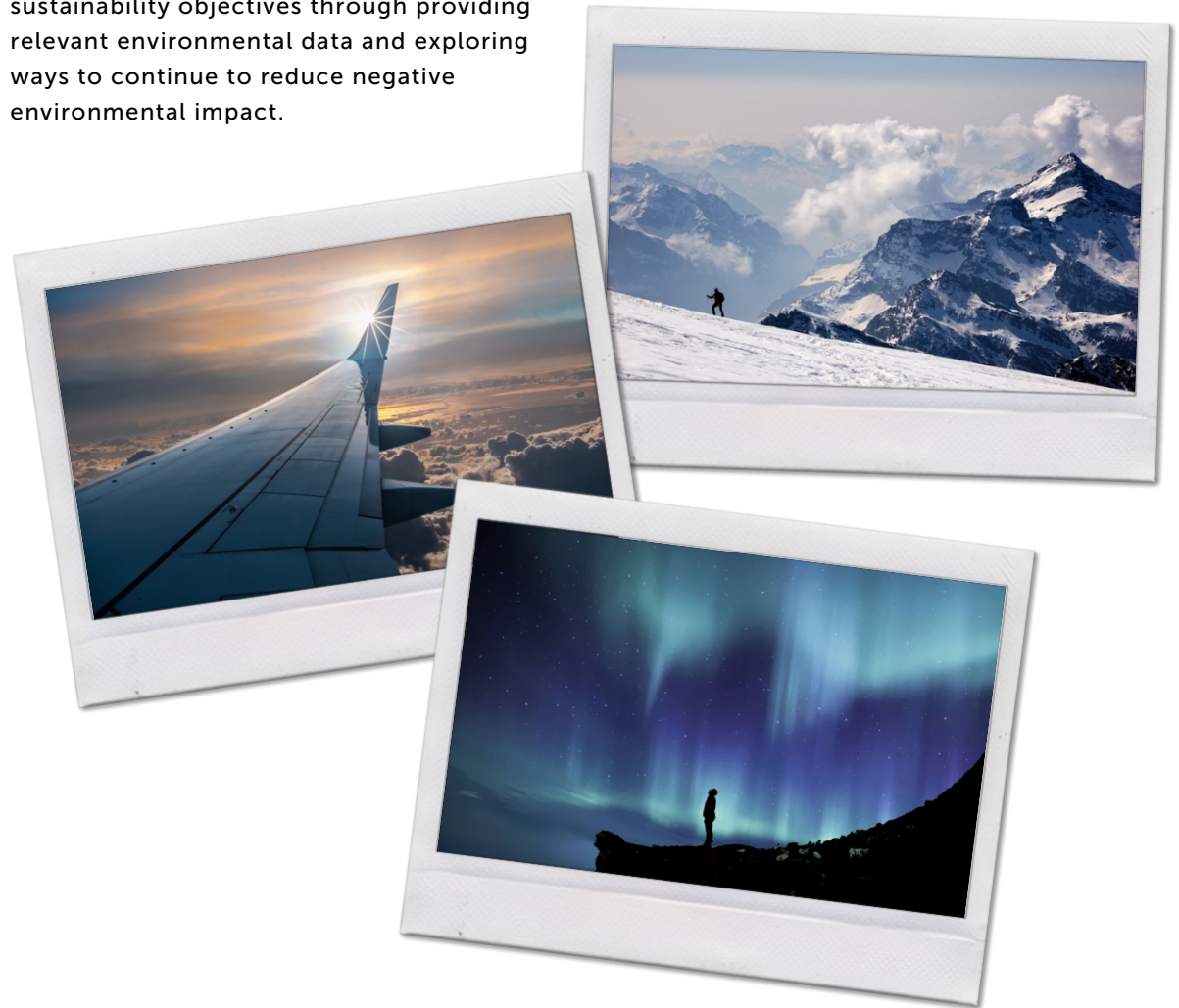
Booking Holdings encourages Suppliers to bolster the well-being of the local community through their business. Suppliers operate with respect for local communities and indigenous people and their rights and title to property and land. Booking Holdings encourages Suppliers to understand and observe the 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.

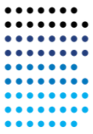
5 Environmental sustainability.

Suppliers recognize the importance of addressing environmental sustainability in their business, and continuously work to minimize the environmental impact of their operations, as much as possible.

Booking Holdings encourages Suppliers to live up to the highest environmental

standards, to support the Booking Holdings sustainability program, and to deliver on its sustainability objectives through providing relevant environmental data and exploring ways to continue to reduce negative environmental impact.





Questions or concerns

Booking Holdings encourages a culture of transparency within our Suppliers and supply chain and encourages all to speak up with legal and ethical concerns, both through line management channels and/or formal reporting channels. Booking Holdings expects Suppliers to report suspected violations of these standards by the Booking Holdings Supplier or by its own employees, contractors, sub-contractors, or Suppliers.

If you have questions about this Code or believe that someone may have violated this Code, please contact the [Compliance Helpline](#). All reports 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 makes a good faith report about potential misconduct who experiences retaliation or other adverse action for raising a concern should report this immediately via the channel identified above.

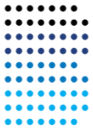
Booking Holdings treats all questions or concerns seriously and in confidence.

Depending on the nature and circumstances, Booking Holdings may seek to work – if and when appropriate – with the Supplier and other affected parties in order to reach a proper and timely resolution.

Please Note: Booking Holdings reserves the right to reasonably modify this Code without prior notice should changes arise in the Compliance & Ethics or Procurement Program.

Issued: April 9, 2021





Appendix

The following principles, standards, and conventions were used in preparing this Supplier Code of Conduct and may be a useful source of additional information.

[Booking Holdings Corporate Responsibility](#)

[Booking Holdings Code of Conduct](#)

[United Nations Guiding Principles on Business & Human Rights](#)

[United Nations Global Compact International Bill of Human Rights](#)

[Booking Holdings Insider Trading Policy](#)

[International Labor Organization's Declaration on Fundamental Principles and Rights at Work](#)

[Business Principles for Countering Bribery produced by Transparency International](#)

[United Nations Sustainable Development Goals: Responsible Sourcing Policy](#)

[Ethical Trading Initiative](#)

