

EMPLOYEE CODE
OF CONDUCT



THE

Boarding Pass



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Team EG,

At Expedia Group we're working together on delivering better traveler outcomes, which means building healthier, higher value relationships that will benefit the traveler, our partners and the entire industry.

It's a deliberate decision to move away from the fight over transactions towards unlocking the full potential of travel for everyone, everywhere.

Just like our investment in great traveler experiences, we are committed to ensuring Expedia Group is a place where our people have great experiences, and our culture is one of integrity and respect.

Each of us plays an important role in creating that culture. It starts with our Values, which guide us in how we show up at work, but that's just the beginning. Acting with integrity is not about following rules and avoiding legal liability – it's about making ethical decisions, treating others fairly, being honest and

putting the interests of Expedia Group above your personal interests. These behaviors create a culture of trust – with colleagues, partners and travelers. Having a great culture also means that we must treat one another with respect and empathy, so each of us feels supported and inspired to do impactful work.

Our Employee Code of Conduct – the Boarding Pass – will help you make ethical decisions based on integrity, respect, honesty, and compliance. The document explains in plain language our values and policies. It does not, however, have all the answers. If you ever encounter situations where you are unsure about what to do, please seek guidance from your manager, the People Team or the appropriate resources described in the Boarding Pass.

Thank you for your continued commitment to keeping Expedia Group a great place to work.

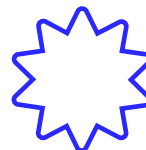


Peter Kern

Vice Chairman + CEO
SEATTLE

Our Values,

Our five Values describe how we behave, outlining attitudes and actions we need to be successful. When we live our Values, we get closer to our full potential – achieving our Mission and Purpose.



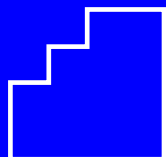
MISSION:

Power global travel for everyone, everywhere



PURPOSE:

Strengthen connections, broaden horizons and bridge divides



VALUES:

CHOOSE FEARLESSLY

Own your decisions. Make mistakes.
Move on. Begin again.

FORCE SIMPLICITY

Drive clarity and create momentum. Focus on impactful work.

INCLUDE CONSCIOUSLY

Bring people in. Drive success for everyone around you. Seek out diverse ideas and experiences to unlock better outcomes for our travelers and our company.

TRUST EACH OTHER

We challenge each other and then place our trust in each other to deliver.

GO GET WHAT'S NEXT

We're always hungry for a better future. We have big dreams - for ourselves, for the company, and for the possibilities opened up by travel.

Integrity

Acting with integrity, in its simplest terms, means doing what is right. By acting with integrity in the everyday decisions we make, we are modeling ethical and lawful conduct.

The Employee Code of Conduct- The Boarding Pass, helps you navigate legal and ethical questions by summarizing our expectations, policies, and applicable laws. The Boarding Pass applies to interactions in various areas of our shared professional lives, whether it be in the office, at events hosted by or attended by EG colleagues, in shared online spaces, on social media or at other events where we represent EG. While we hope The Boarding Pass will help guide you, it does not replace the various policies that are referenced. You are responsible for familiarizing yourself with those policies and laws that are relevant to your role.

→ **Links to these policies can be found at the end of the document.**



SPEAK UP

While most of the time we get it right, we recognize that this is not always the case. Sometimes we experience or witness behavior that does not align with our values. You can report concerns about incidents that involve your work colleagues, travelers, partners and suppliers. We want to make sure that you feel supported in speaking up about anything and there are a several ways you can speak up:

- 01 Speak with your manager, Human Resources, or any other member of management.
- 02 Speak to [Jeff Davis](#), VP of Corporate Audit Services or [Bob Dzielak](#), Chief Legal Officer.
- 03 Report your concern confidentially and anonymously online at www.expedia.ethicspoint.com
- 04 Call the Ethics Helpline, a confidential third party service, to report a concern confidentially and anonymously. Within the United States or Canada, call **1-888-571-6827**. International numbers are available for other countries at www.expedia.ethicspoint.com



All reports and concerns made through any of the methods above will be treated promptly, fairly, and diligently with the highest possible degree of confidentiality. Reports of suspected misconduct or violations must be made in good faith. If you encounter evidence of suspected criminal activity while at work, regardless of whether it involves an employee, you may report it to the Ethics Helpline. If the situation involves imminent danger or violence, please use your best judgement and report it to the emergency phone number of the relevant location.

Honest reporting does not require that your suspicions are correct, but rather that the information you are providing is accurate. It is, nevertheless, a violation of the Boarding Pass to make a false or misleading report or to obstruct any investigation. All employees are required to cooperate with Company investigations.

For additional information regarding reporting misconduct and concerns, consult [EG's Global Whistleblower Policy](#).

Zero Tolerance for Retaliation

We prohibit any form of retaliation against anyone who made a good faith report, assisted in making a report, or cooperated with a Company investigation. Retaliation can take many forms, including, but not limited to dismissal, withholding of promotion, negative performance assessment, exclusion from training or events, and other forms of disadvantageous or unfair treatment. You may report any instances or concerns of retaliation using any of the methods mentioned above.

COMMITMENT TO INCLUSION AND DIVERSITY

Our ability to power global travel for everyone, everywhere is dependent upon a diverse and inclusive workplace. Through seeking out diverse ideas and experiences we will create better outcomes for our travelers and our company. To this end, we strive to promote an open, inclusive, and productive work environment where each employee can fully engage and do their best work. We will not tolerate discrimination of any kind.

Every employee or job candidate at the company will receive fair treatment and equal access to opportunities, regardless of race, ethnicity, religion, national origin, age, disability, sexual orientation, gender identity or expression. This also extends to caregiver, marital, family or socioeconomic status and political affiliation, as well as mental illness, or physical appearance. This applies to all aspects of employment, including recruitment, hiring, training, compensation, promotion, discipline, and termination.



Integrity in Dealings with One Another

TREATING EACH OTHER WITH RESPECT

Creating a culture where employees can focus on delivering impactful work requires an environment of trust, respect, and accountability, while including consciously and driving for success for everyone around you. We do not tolerate insulting, intimidating, violent, abusive, demeaning, harassing, or bullying conduct towards others. Workplace bullying is defined as repeated and unreasonable behavior directed toward a person or group of people.

This expectation extends to in-person interactions, as well as written communications in any company or private channel, including email, Slack, text messages, and social media. Although an isolated incident of unreasonable behavior (that is not egregious or severe) may not necessarily be considered workplace bullying, it may have the potential to escalate and therefore should not be ignored.



Examples of Bullying Include, But Are Not Limited to:

- Name-calling that is insulting or humiliating; using a person as the subject of jokes.
- Socially or physically excluding or disregarding a person in work-related activities.
- Shouting or raising one's voice at an individual in public or in private.
- Nonverbal threatening gestures, such as slamming doors or invading the space of the other person as an act of aggression.
- Constant criticism on matters unrelated or minimally related to the person's job performance; excessive monitoring/micro-managing.
- Manipulating the ability of someone to do their work (e.g., overloading, underloading, withholding information, assigning meaningless tasks, setting deadlines that cannot be met).
- Sabotaging or undermining of a person's work performance.
- Persistent ignoring or interrupting an individual in any meeting setting.
- Spreading rumors and gossip regarding an individual.
- Taking credit for another person's ideas or work.

The line between harassment and bullying is often blurred. Both behaviors are similar in that they hurt another person through intimidating, offensive, and insulting conduct. But harassment differs from bullying in that it is a form of discrimination and may be unlawful, depending on your jurisdiction. Discrimination is treating someone unfairly based upon their personal characteristics, appearance, or beliefs.

Examples of Harassment

Include, But Are Not Limited to:

- Unwelcome flirtation, persistent attention, or social invitations, and/or unwanted sexual advances.
- Sexually suggestive, offensive jokes, gestures, or sounds.
- Displaying or sending pornographic, obscene, or sexually suggestive pictures or materials.
- Making or threatening to make submission to sexual advances or requests for sexual favors a requirement for a job opportunity or benefit.
- Refusing to recognize a person's gender identity (he/him, she/her, they/them).
- Making jokes about a person's gender identity.
- Behavior that could be considered discriminatory or demeaning towards a group or person. This includes, but is not limited to a person's physical appearance, race, ethnicity, gender identity, sexual orientation, disability, or religion.

This is not an exhaustive list. Conduct not described above may still be inappropriate. The Boarding Pass cannot address every potential situation that would be considered bullying or harassment. You are expected to use common sense, exercise professional judgment, and treat one another with empathy and respect.

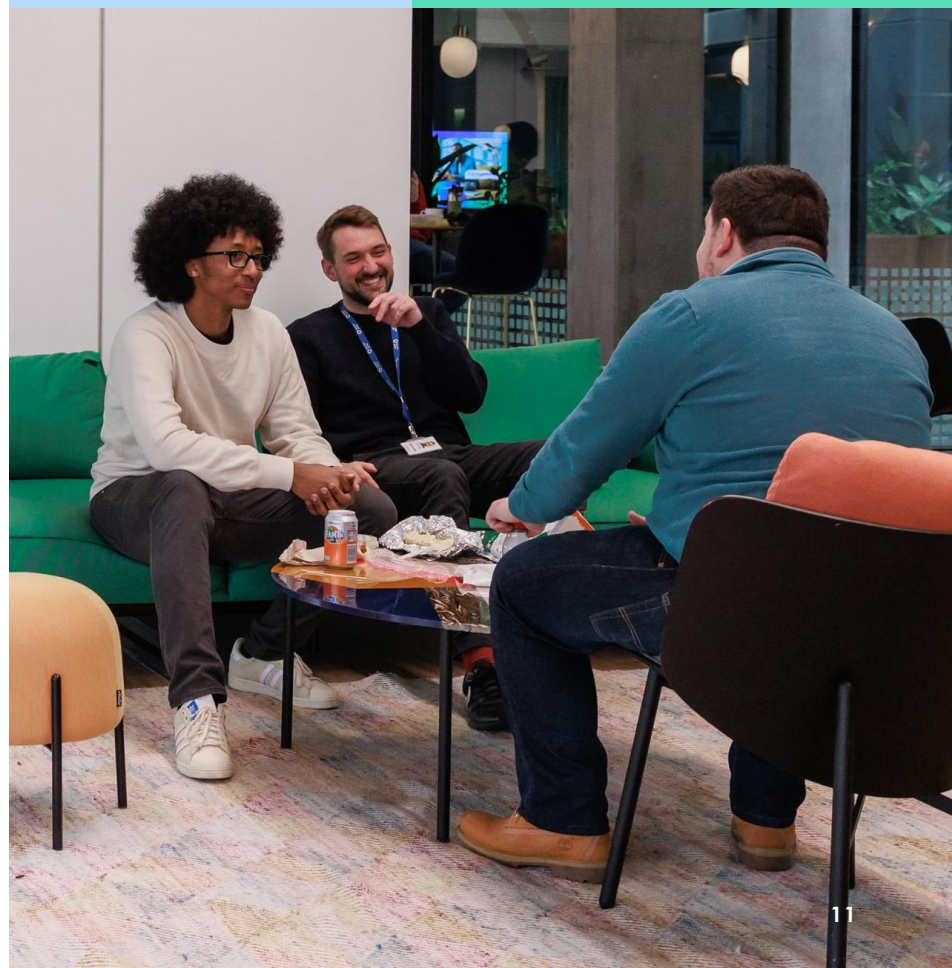
Please note, however, that reasonable and constructive feedback on performance and/or behavior is not considered bullying or harassment.

SAFETY AND HEALTH

We are committed to creating a safe and healthy work environment. We prohibit the possession and/or use of illegal drugs while at work and at company or partner-sponsored business events. Weapons or explosives may not be carried onto EG premises, or while traveling or engaged in business for EG.

Moreover, no employee may be impaired by drugs or alcohol while acting on behalf of EG. 'Impaired' means your judgment is compromised or your physical ability to perform your work or function in a professional environment is diminished.

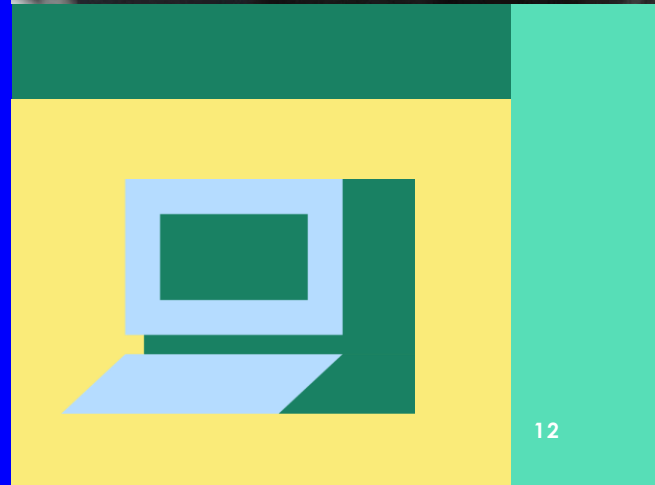
[Responsible Drinking Policy](#)



Integrity in Dealings with Company Information, Technology and Resources

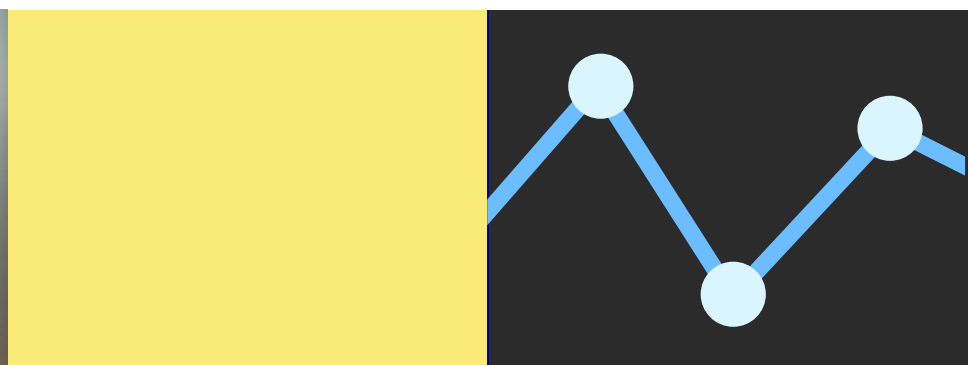
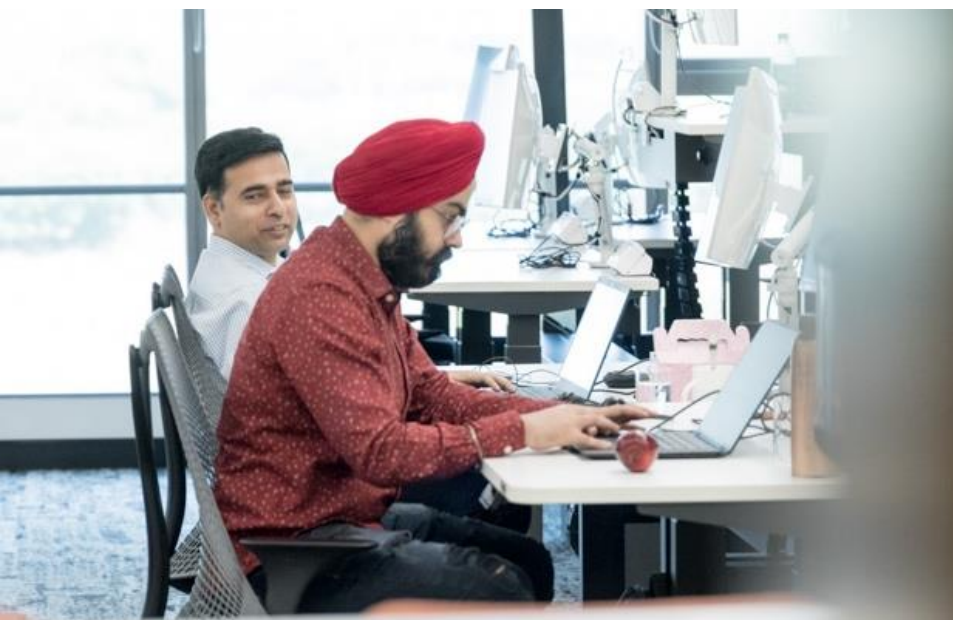
BUSINESS AND FINANCIAL RECORDS

Maintaining accurate business records is everyone's responsibility—not just for accounting and finance employees, but also because accurate record-keeping and reporting reflects on our reputation and credibility. We are committed to transparency and truthfulness in financial reporting to provide our shareholders, the financial marketplace, and regulators with an accurate representation of our performance and financial position.



We must be accurate when preparing any information for the Company, including but not limited to customer service data, performance reports, income statements, balance sheets, statements of cash flow, and expense reports. Never distort the nature of any transaction. All payments must be recorded and accounted for in our books and records in the correct accounting period and in the proper account and department. Ensure any expense reimbursement claims are honest and accurate. If you become aware that an internal control or procedure has been circumvented improperly or overridden, you should report the incident immediately to your manager or to the Ethics Helpline.

We manage and retain all Company records according to our Company's [Record Retention Policy](#). It is particularly important to ensure retention of all documents that relate to any imminent and/or ongoing investigation, lawsuit, or audit involving the Company. You should never conceal, alter, or destroy any documents or records related to such inquiries (even in situations where the retention period has lapsed).



TRADING SHARES AND INSIDER INFORMATION

You and your immediate family members are prohibited from trading in EG or trivago shares while in possession of material, nonpublic information about EG or trivago. You are also prohibited from sharing material, non-public information with non-employees or making investment recommendations to others based on such information.

What is material, nonpublic information? Information is non-public if it has not been broadly disclosed to the general public (e.g., in our quarterly earnings release). Information is material if a reasonable investor would consider it important when making a decision to buy or sell a company's stock, or if it would likely affect the market price of the stock if disclosed publicly.

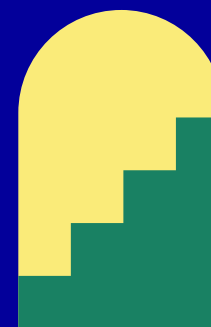
Examples of information that is more likely to be considered material include:

- Company or significant business-unit operating or financial performance for a quarter that has not been reported publicly via our earnings release.
- Projections of future earnings or losses.
- A significant acquisition, strategic partnership, or sale of a business unit.
- Major change in management or strategy, including major spending and/or cost saving programs.
- Public or private offerings of stock or other financing.
- Changes in dividend payments, stock splits, and stock repurchase programs.

“INSIDERS” AND TRADING WINDOWS

Insiders are individuals who have access to material non-public information about EG and its brands and businesses. “General” Insiders are only permitted to trade EG or trivago shares within a limited “trading windows, usually” following each quarterly earnings announcements and “Designated Insiders” must also obtain written pre-clearance to trade, even during open trading windows. If you have been identified as a General Insider or as a Designated Insider, you will receive regular emails from tradealert@expedia.com informing you of the expected timing of upcoming trading windows.

If you have questions about trading in EG or trivago shares, you should first read our [Securities Trading Policy](#). If you still have questions, or are unsure of your status as an Insider, or wish to obtain pre-clearance to trade, you should email tradealert@expedia.com.



PROPRIETARY AND CONFIDENTIAL INFORMATION

EG's proprietary and confidential information, especially our intellectual property—innovations, tools, and trade secrets, etc.—enable us to develop new products and services and maintain a competitive advantage. Our trade secrets and much of our business information are confidential and, if disclosed, could be harmful to EG and travelers.

We all have the responsibility of safeguarding EG's proprietary and confidential information. In performing your work, ensure that you don't compromise our security and confidentiality obligations in the handling of information about other employees, travelers, partners, clients, and other third parties.

Although this is not an exhaustive list, examples of proprietary and confidential information include:

- Non-public financial information.
- Personal Data of travelers, employees, and other third parties. If you believe that Personal Data may have been accidentally or unlawfully accessed, lost, or disclosed, you should immediately report it by filling out the [Security Event Report Form](#) or notify the Global Service Desk.
- Supplier or business partner information, e.g., pricing, banking information, contract terms.
- Intellectual property, (e.g., proprietary processes, trade secrets, code base, algorithms, computer programs, models, Company developed software, and related documentation).
- Corporate strategy, including new product or service plans.
- Non-public information about the Company or other companies with which we do business.

You must take all reasonable precautions to prevent any breaches of EG proprietary and confidential information.

Ensure you follow these principles:

- Do not share our proprietary and confidential information with friends, family members, former employees; do not share it with anyone except your current colleagues.
 - Access confidential information only when there is a business need and you have proper authorization.
 - Always securely dispose of copies of confidential information if there is no business need for the copies.
 - Ensure agreements are in place to protect confidential information before sharing it with third parties or sharing other parties' confidential information.
 - Do not discuss confidential information in public places where it may be overheard.
-
- Do not work with documents containing confidential information whether in paper or electronic form in public places if third parties can see them.
 - Always restrict access to confidential information posted on the Intranet and SharePoint sites.
 - Do not email confidential information to your personal email account or save it on an unencrypted, personally owned storage device.
 - Your obligation to protect our confidential information continues after you leave EG. You cannot use this information in any future employment or for any other purpose.

USING INFORMATION AND COMMUNICATIONS TECHNOLOGY

Our information and communications systems and the electronic data they store, process, or transmit are vital business assets. Maintaining the security and integrity of EG's information and communication systems helps ensure the efficiency and effectiveness of our operations while avoiding legal liability, financial loss, and reputational damage. Our [Acceptable Use of Company Technology Policy](#) applies to all computer equipment, electronic devices, network hardware, software, network access, instant messaging tools or applications, and wireless/wired connection, as well as all devices owned by employees accessing EG's network or data.

Any use of our information technology and other EG systems, devices and other property that we provided to you will be considered business-related and must comply with (i) confidentiality and data protection responsibilities under your Employment Agreement, as well as (ii) EG's data protection and information security policies and standards, including the Boarding Pass.

Reasonable personal use of EG's information technology and communication systems is acceptable. Personal use of the EG assets and systems is unreasonable if it:

- Interferes with your job responsibilities or productivity.
- Incurs significant costs to EG.
- Significantly reduces the value of EG assets.
- Places EG at a risk of liability.
- Is used to view or store pornography, obscene, or sexually suggestive pictures or materials.
- Violates the Boarding Pass or any EG policy or procedure.
- Is used to create or post illicit content. This includes but is not limited to any content that is harassing, abusive or threatening violence, that is racist, discriminatory, or demeaning towards a person or group of people.
- Is used to commit a crime (including, but not limited to hacking, solicitation of prostitution, production, collection and/or dissemination of child pornography, gambling, procuring/selling illicit drugs, violence, support of terrorist activities).

We may carry out certain processing activities of our information technology and other systems or devices we provided to you as necessary in order to protect the Company's assets, protect it from any inadvertent loss of confidential data, and identify if you have been involved in phishing scams, fraud or activities in competition or inconsistent with your work for EG. For instance, we may review your browsing or communications activity or approximate location when using our devices or systems (if permitted by local law). Any irregularity in the use of our information or devices, will be investigated to identify violations of law or breaches of your Employment Agreement or our policies and to protect the rights and interests of EG, our employees and other third parties.

Such processing activities will be carried out in a proportionate and reasonable manner. For example, any accessing of a current employee's password-protected email or other materials requires advance approval from the Chief Legal Officer or the Legal Department. In cases where an employee has used EG's assets and/or communications network to commit a crime or help others commit a crime, we will fully cooperate with law enforcement and related government inquiries.

Company Resources

EG resources should only be used for legitimate business needs. You are expected to use Company resources responsibly and avoid waste. You must never misuse any Company assets or use our resources for personal gain. When traveling or conducting business on behalf of EG, you should adhere to EG's [Global Travel and Expense Policy](#) and properly document and report business expenses. Additional guidance on expensing and requesting reimbursements can be found [here](#). If you need to pay EG back for a cancelled purchase for which you have already been reimbursed or for a personal expense please consult the [Procedure for Refunding EG](#).

SOCIAL MEDIA

For many of us social media plays a major role in sharing information and connecting with others. Although we recognize the importance of our freedom of expression and consider our diversity and differences as strengths, you should use good judgment and common sense when posting content on social networking sites. You should assume that anything you do on personal social media accounts (whether public or private) could be viewed by a colleague, manager, partner, or traveler.



- Do not post or repost any illicit content or do anything online which could damage the reputation of EG and/or your own reputation as an EG colleague or People Leader. This includes but is not limited to any content that is abusive, dehumanizing, harassing, or threatening violence towards anyone or any group of people. We do not tolerate any form of "hate speech." Hate speech is spoken words or writing which expresses prejudice against a particular group, especially on the basis of race, caste, religion, sexual orientation or identity, gender, or disability. Content showing someone being injured or humiliated, is obscene or sexually explicit, or depicting illegal activity is also unacceptable.
- Do not disclose EG's proprietary and/or non-public information or confidential information, including about EG staff, business partners, travelers, or suppliers.
- Make clear your affiliation to EG when making any positive statements about EG on social media (e.g. online product reviews). If you identify yourself as an employee of the Company on social media, be sure not to imply that your views are endorsed by EG.

[Social Media Policy](#)

(This policy does not apply to employees in Germany)

Can I do this?

Q: I support many political and social causes and frequently post political messages and information about the location of peaceful protests on my social media accounts. Sometimes I use profanity to express my opinions in order to make a statement and to get my messages across. My Instagram account is public and many like-minded Expedia employees follow me. Can I do this?

A: You are entitled to express your political views and opinions, whether publicly or privately. However, do not identify yourself as an EG employee or affiliate yourself with EG when expressing your views on social media. Ensure that your communication is not harassing, threatening violence, or could be considered racist, bigoted, or demeaning towards a group of people or person. Consult the Social Media Policy for further guidance.

Can I do this?

Q: I think my manager is incompetent and I don't like how she is managing the team. I wrote on my private Facebook page, which some of my Expedia colleagues have access to: "I hate Expedia! My boss is an idiot and doesn't know what she is doing. Please don't use the Expedia website, there are better deals elsewhere, what a joke!" Can I vent about my job and manager on my private Facebook page?

A: This behavior is unacceptable and could risk damaging our reputation and business. Employees should not conduct themselves in a way that could hurt another person through intimidating, offensive and insulting behavior. This behavior is also in contravention of our policy on Anti-Bullying and Harassment described in this document.

Integrity in Dealing with Conflicts of Interest

Each of us has a duty to advance EG's interests over our own. A conflict of interest may exist if your personal or outside professional activities or relationships interfere with your independent judgment and your ability to act in the best interests of EG.



Nepotism At Work:

Employees cannot hire or supervise a person with whom they have a Personal Relationship. Additionally, employees cannot provide performance or job interview feedback, or influence compensation or promotions concerning a person with whom they have a Personal Relationship. Employees who refer job candidates through EG's employee referral program cannot be on the interview panel of the job candidate they referred. "Personal Relationships" may include, but are not limited to, family members (spouse, domestic partner, parent, grandparent, child, stepchild, sibling, aunt, uncle, niece, nephew or first cousin), external business partners, and anyone with whom you are engaged in a romantic or intimate relationship.

All disclosures should be made through the [Conflict of Interest](#) Form.

Employees in Germany are not required to disclose conflicts of interest involving Personal Relationships at work.

Nepotism in Business Relationships:

If your role involves participating in selecting, evaluating and/or doing business with a supplier or partner who employs a person with whom you have a Personal Relationship in a decision-making role -- you must recuse yourself from the procurement or selection process and refrain from participating in managing the business relationship and evaluating the supplier or partner. You should also disclose any personal relationships that would impact your ability to evaluate a party's business proposal and/or performance objectively. Disclose any such relationships to your manager and fill out the [Conflict of Interest](#) Form.

Working for Competitors:

You or a person with whom you have a Personal Relationship working, consulting or serving as a board member for a company that competes directly or indirectly with EG could cause a conflict of interest. Please disclose any such plans or relationships through the [Conflict of Interest](#) Form.

Outside Employment:

Although EG employees are free to pursue outside business opportunities, owning a business, having second job or other outside activity may cause a conflict of interest. Outside employment would create a conflict of interest if it: (1) interferes with your ability to perform your EG job responsibilities (e.g., time commitment), (2) interferes with your ability to act in the best interests of EG (e.g. working for a partner, or supplier) or (3) risks damaging EG's business or reputation (e.g. blogging about your work at EG, disclosing EG's confidential information to a third party.)

Never use your position at EG to take away business opportunities from or compete with the Company, or for personal financial gain.

If you are considering an outside business opportunity or are currently engaged in outside employment that could create a conflict of interest, disclose the activity to your manager and obtain their approval. Fill out the [Conflict of Interest](#) Form and attach your manager's approval.

Investments:

Owning or having a substantial financial interest (more than 5%) in a competitor, supplier or partner could create a conflict of interest. If you are unsure whether an investment would create a conflict of interest, seek review by completing the [Conflict of Interest](#) Form.

[Conflict of Interest Policy](#)



Can I do this?

Q: A research firm recently offered to compensate me to answer some questions about the travel industry generally. The firm assures me that I will not be asked to discuss confidential information about Expedia Group with them. Can I work with the consulting firm?

A: Research firms or “expert networks” that provide industry information as a service to potential investors may contact you for informational interviews. Although they may not be clear about their intentions, these groups may be looking to solicit confidential, competitively sensitive or material non-public information. If you are approached by an expert network or similar group, you should politely decline their request or fill out the [Conflict of Interest](#) Form before discussing anything with the group.

Can I do this?

Q: I have been asked to be on the advisory board of another organization or company. Can I accept?

A: Serving as a member of an external advisory board is generally permitted so long as (1) the organization or company does not compete with EG’s business either directly or indirectly, (2) your service would not create an unreasonable risk of disclosing EG’s trade secrets or competitive/confidential business information, and (3) the time commitment involved would not interfere with your EG responsibilities. Situations involving potential conflicts of interest, including service on advisory boards, may not always be clear. If you need further guidance, please fill out the [Conflict of Interest](#) Form.

Gifts and Entertainment

In many of the countries where we operate, gifts and entertainment are an integral part of doing business. They are business courtesies used to generate goodwill and promote business relationships. We must, nevertheless, avoid offering and accepting gifts or entertainment that would create the perception that we solicited or received an unfair advantage or benefit from external parties.



When offering or accepting gifts follow these core principles:

- Only offer and accept gifts or entertainment of reasonable value.
- Never offer or accept gifts in exchange for doing or promising to do anything for any person or business.
- Never solicit gifts or entertainment from our partners or suppliers for personal use.
- Never offer or accept gifts of cash or cash equivalents.
- Never offer or accept gifts that would be an embarrassment to you or EG if the public became aware of it.

Employees who participate in selecting or evaluating partner and suppliers or negotiating agreements must be particularly careful to avoid conduct that could create the appearance of a conflict of interest or favoritism. It may at times be difficult to evaluate a particular situation. When in doubt you should ask for clarification by using the [Gifts & Entertainment](#) form.

[Global Anti-Corruption and Gifts & Entertainment Policy](#)

Integrity in Relations with Others

RELATIONS WITH PUBLIC
AUTHORITIES



BRIBES, KICKBACKS, AND OTHER CORRUPT PRACTICES

Many countries (including the United States) have very specific laws prohibiting corrupt business practices. We are committed to complying with these laws. No business opportunity that requires inappropriate, illegal, or corrupt conduct by our employees is worth the legal and financial liability or risk to our reputation—no matter how important or potentially profitable the opportunity may seem to be. Under no circumstances may an employee or any third party working on our behalf offer, give, seek, or receive a bribe, kickback, or anything of value, whether in dealings with public officials or private individuals to secure an improper advantage for EG.

Anything of value is defined as anything that may be of value to a person, including but not limited to cash, gifts, entertainment, personal favors, and offers of employment and/or business opportunities. Even a charitable or political contribution could be considered a bribe if offered to influence a decision. There is no monetary threshold; any amount that is intended to improperly influence a person could be construed as a bribe.

Moreover, facilitation payments may be considered illegal. Facilitation payments are payments made to foreign public officials to speed up the performance of a routine governmental procedure. If, in the course of doing business for EG, public official requests a facilitation payment from you, contact the Legal Department for guidance by filling out the [Ask Legal Form](#).

[Global Anti-Corruption and Gifts & Entertainment Policy](#)

MONEY LAUNDERING

Money laundering is the concealment of the proceeds of crime, typically by means of transfers involving foreign banks or legitimate businesses. We must exercise care and good judgment when handling payments, whether in connection with a traveler transaction or supplier to prevent the use of our resources to launder money, the funding of terrorism, or other criminal activity. In order to mitigate risks associated with money laundering, it is important that we implement industry best practices aimed at preventing money laundering and financial crimes. This starts with ensuring that we make payments for goods and services through approved and documented payment procedures. We only conduct business with travelers that provide proper information so that we can determine whether the payments are appropriate.

You should:

- Never accept payments in cash.
- Never make or accept a payment to/from an entity that is not a party to the transaction (e.g., third party).
- Never enable either EG or another business to evade taxes.
- Make or receive payments only through EG approved payment methods to or from legitimate businesses and only for legitimate bookings, contracts, goods, or services.

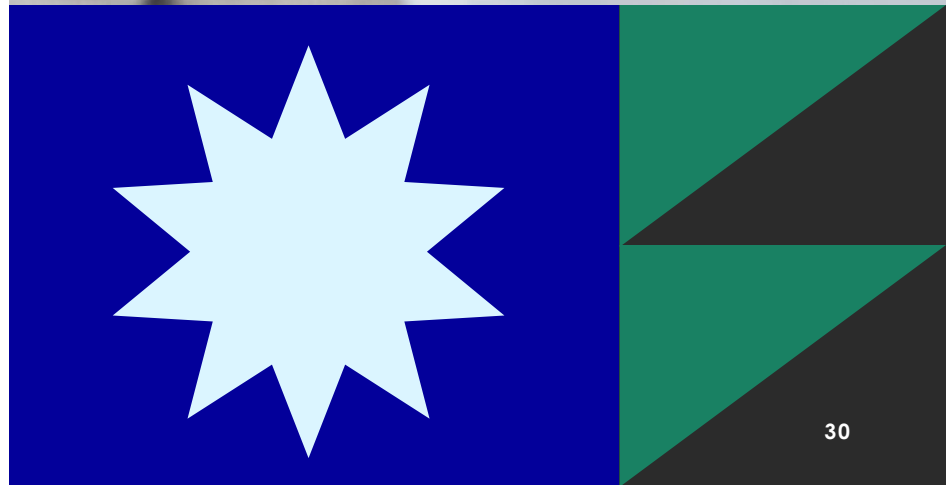
If you observe a transaction that is suspicious or potentially indicative of money laundering activity, you should bring the transaction to the attention of the member of the Legal Department supporting your line of business for review.

[Anti-Money Laundering Policy](#)

RELATIONS WITH TRAVELERS

Powering global travel for everyone, everywhere is our mission. Our product and service innovation are at the center of this objective. We do this by delivering differentiated products, services and experiences based on what our target traveler segments value the most. To this end, we consistently solicit traveler feedback on our products and services and serve travelers with honesty, professionalism, and respect in order to earn their loyalty and trust.

The fact that most travelers deal with us via the Internet and through automated transactions means that we must make our best impressions whenever we are presented with the opportunity to interact with travelers directly. Meeting with, speaking to, or corresponding with a traveler is a valuable opportunity to reinforce our reputation for reliability and trustworthiness. If your role is not traveler-facing, but you are engaged by a traveler, gather as much information as possible, document that information, and forward the request to the [Employee Escalations team](#). This team will further assist the traveler.



RELATIONS WITH PARTNERS & SUPPLIERS

Our business partners and suppliers are an important part of our success. We build strong relationships with partners and suppliers through fair dealing, transparency, and professionalism. This means we must never take unfair advantage of anyone through changing existing price and/or contract terms without their agreement, misrepresentation of facts, abuse of confidential information, or utilize any other unethical business practices.

- Select partners and suppliers based on quality, service, price, terms, and other relevant factors.
- Never misrepresent information which could affect price and/or contract terms from a supplier or partner.
- Protect our confidential information, proprietary information, and trade secrets, including with a non-disclosure agreement. Also, protect any confidential information or personal data that a supplier and/or partner provides to EG.
- When staying at a partner property, never use your position as an EG employee to obtain preferential treatment or to avoid any financial responsibility or liability for any damage caused by you or any member of your party.

CONTRACTING WITH THIRD PARTIES

We must ensure that the contracts we enter into enable us to effectively manage financial, legal and commercial risks. If your role requires your involvement in the contracting process, you should take the EG Contracting Essentials training course which is available on Workday Learning. The training explains contracting roles and responsibilities, approval and spending limits and signing authority, all of which are mandated by the [Contract and Spending Authorization Policy](#) and the [Contracting Policy](#).



- Work with the Legal Department to make sure we use the correct contracting entity.
- Ensure contracts are reviewed and approved by the Legal Department, Finance, Procurement, and the relevant business unit representatives.
- Document approvals using the [Contract Approval Routing Form](#) or 'CARF'.
- Ensure contracts are signed by someone who has been granted signing authority for the relevant contracting entity. Never sign any contract on behalf of an Expedia Group entity unless you have confirmed you have the authority to do so. (The person who signs the Contract Approval Routing Form may not necessarily have the authority to sign the contract and vice versa.)
- Send completed contracts and CARFs to exconadm@expedia.com for loading into our contracts database.

RELATIONS WITH COMPETITORS

Anti-Trust/Competition Laws

Antitrust laws govern the way businesses compete and are intended to protect consumers from unfair business arrangements and practices that inhibit competition. These laws are complex and vary from country to country. We must obtain competitive advantages through superior services and products and never through anti-competitive, unethical or illegal business practices. [Antitrust and Competition Policy](#)

You must never:

- Communicate or agree with competitors about pricing, setting prices, volume or type of services, or standardizing terms and conditions for products or services.
- Communicate with a competitor about prices we or they charge for products or services.
- Agree with a competitor to divide markets.
- Agree not to deal with a particular group of travelers or partners.
- Set the terms or fix the outcome of a competitive bidding process, or share bidding information with competitors.

GATHERING INFORMATION ABOUT COMPETITORS

Monitoring competitors' activities in the marketplace is legitimate and necessary to better understand our competitive opportunities and challenges. However, we must never attempt to acquire information about our competitors illegally or unethically.

You must never:

- Ask a current or former employee of one of our competitors to violate their confidentiality obligations.
- Hire someone from a competitor to obtain trade secrets or confidential information.
- Pretend to be someone you are not in order to get another party to release information to you.

EXPEDIA GROUP CARES

Think global. Give locally.

Our commitment to giving back is a direct reflection of the priorities and interests of our employees. Each office is encouraged to support local organizations through volunteering; often this includes mentoring, community clean-up efforts, and fundraising, as well as charitable giving to support both local and international organizations.

We offer gift matching, through which we match employees' charitable donations up to USD \$10,000 (or the local currency equivalent) per employee per year. This enables employees to double the impact of their donations to qualified charitable organizations of their choice. We also donate USD \$15 (or the local currency equivalent) per hour for each hour an employee volunteers with a qualified charity, up to USD \$1,000 (or the local currency equivalent) of the annual USD \$10,000 (or the local currency equivalent) matching gifts benefit. To learn more about the program or to submit a Matching Gift of Volunteer Hours match request visit the [Expedia Gives](#) page on Basecamp.



HUMAN RIGHTS AND MODERN SLAVERY

EG is committed to protecting human rights and opposing all forms of modern slavery, servitude and forced labor and human trafficking. In keeping with this belief, we take our roles in travel seriously. We are conscious of the supply chain and travel industry in which we operate. We accordingly seek ways to assist our travel suppliers and partners in identifying potential instances of human trafficking, and enhance their monitoring. Moreover, we endeavor to maintain business relationships with travel suppliers and partners that are committed to respecting human rights and workplace rights.

HELPFUL RESOURCES

Ethics Helpline

To submit a web intake form: www.expedia.ethicspoint.com

Within the United States or Canada, call 1-888-571-6827.

Outside the US, phone numbers are available at
www.expedia.ethicspoint.com

To ask questions:

[Ask Legal](#)

[Gifts & Entertainment](#)

[Conflict of Interest](#)

[Frequently Asked Questions](#)

[Inclusion & Diversity](#)

Policies

[Acceptable Use of Company Technology Policy](#)

[Anti-Money Laundering Policy](#)

[Antitrust and Competition Policy](#)

[Conflict of Interest Policy](#)

[Contract and Spending Authorization Policy](#)

[Contracting Policy](#)

[Global Anti-Corruption and Gifts & Entertainment Policy](#)

[Information Classification and Handling Standard](#)

[Responsible Drinking Policy](#)

[Securities Trading Policy](#)

[Social Media Policy](#)

[Travel Expenses Policy](#)

Forms

[Employee Escalations](#)

[Security Event Report Form](#)

[Contract Approval Routing Form](#)

