EXPEDIA GROUP: EMPLOYEE CODE OF CONDUCT

The Boarding Pass
Team EG,

As Expedia Group’s CEO, I am honored to be by your side as we unlock the full potential of travel for everyone, everywhere. Travel is a force for good. It enables us to strengthen connections with others, broaden our horizons, and to bridge divides around the world. Together we have made a real impact on our business through our extraordinary resilience and ability to adapt and work together to solve problems. We have big dreams for ourselves, for the company, and for the possibilities opened up by travel. We will continue to work for a better future by improving our business for our customers and partners for years to come.

A major component of our future success depends on having a great culture. Each of us plays an important role in creating a culture of integrity and respect. 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 our colleagues, partners and customers. Having a great culture also means that we must treat one another with respect and empathy, so that 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 in which you are unsure about what to do, I urge you to seek guidance from your manager, Human Resources 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 and CEO
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 to 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 polices 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 doesn’t align with our values. You can report concerns about incidents that involve your work colleagues, external customers, partners, suppliers, and vendors. We want to make sure that you feel supported in speaking up about anything that impacts you and there are a number of ways you can do so, including:

- Speaking with your manager, Human Resources, or any other member of management.
- Speaking to Jeff Davis, VP of Corporate Audit Services or Bob Dzielak, Chief Legal Officer.
- Reporting your concern confidentially and anonymously (depending on your location) online at www.expedia.ethicspoint.com
- Making a toll-free call to the Ethics Helpline to report a concern confidentially and anonymously (depending on your jurisdiction). Within the United States or Canada, call 1-888-571-6827. International numbers are available for other countries at www.expedia.ethicspoint.com

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1 Employees in France, Sweden and Portugal may only report anonymously on financial issues, corruption, auditing & accounting, banking issues and falsification of company records.
2 Employees in France, Sweden and Portugal may only report anonymously on financial issues, corruption, auditing & accounting, banking issues and falsification of company records.
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 law enforcement 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, unethical and 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.

**Zero Tolerance for Retaliation**

We do not tolerate retaliation against any employee who makes a good faith report.
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, caregiver status, marital status, family status and political affiliation as well as mental illness, socioeconomic status or background 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 (unless it is especially 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, under-loading, 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 for EG. ‘Impaired’ means your judgment is compromised and your physical ability to perform your work or function in a professional environment is diminished.
Integrity in Dealings with Company Information and Technology

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 if we are past the retention time).
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 material, non-public 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 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 financings.
- Changes in dividend payments, stock splits, and stock repurchase programs.
“Insiders” and Trading Windows

Employees who have regular access to material, nonpublic information will be added to the Company’s general “insider” list. 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 the EG stock within a specific window (“trading window”) following each quarterly earnings announcement. The trading restriction also applies to the family members who live in the same household as Insiders. If you are on the insider list, you will receive regular emails from tradealert@expedia.com regarding the timing of trading windows. If you are identified by EG as a “Designated Insider,” you must contact the Legal Department at tradealert@expedia.com to obtain pre-clearance in writing prior to buying or selling the EG’s stock, even during open trading windows.

If you have questions about trading in Expedia Group (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, you should send an email to tradealert@expedia.com where members of our Legal team can assist.
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 is confidential and, if disclosed, could be valuable to competitors and even be harmful to EG and our customers. 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 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 customers, employees, and other third parties (e.g., customer profiles, passport information, credit card data, and dates of birth). 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 (either in hard copy or electronically) 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.
- Remember that the 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 provide to you will be considered business-related and must comply with (i) confidentiality and data protection responsibilities under your Employment Agreement with us, as well as (ii) our data protection and information security policies and standards, including the Code of Conduct.

Reasonable personal use of the 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 any applicable 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 provide to you as necessary in order to protect the company’s assets, to protect it from any inadvertent loss of confidential data, and to identify if you have been involved for example in phishing scams, fraudulent activity or activities in competition with 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, will be investigated to identify any violations of law or breaches of your Employment Agreement with us or our policies and more generally 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. 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 to locate and make available all relevant evidence.
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 customer.

- 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, customers, or vendors.

- 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.
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. I think I work at a nursery sometimes! 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 on pages 6-8 of 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 Family Member or Romantic Partner. Additionally, employees cannot provide performance or job interview feedback, or influence compensation or promotions concerning a Family Member or Romantic Partner. “Family member” is defined as the spouse, domestic partner, parent, grandparent, child, stepchild, sibling, aunt, uncle, niece, nephew or first cousin of the employee. A “Romantic Partner” is someone with whom you are engaged in an intimate relationship.

Moreover, Family Members as defined above, working under the same Vice-President are required to disclose their familial relationship so that any potential conflicts of interest may be evaluated and managed. Family Members cannot to report to each other under any circumstances. In cases where you are in a romantic relationship with an employee of a partner or vendor with whom you work or with an EG employee whom you either supervise or whom you report to, you should disclose your relationship. Additionally, Senior Director level employees and above are required to disclose romantic relationships with any employee of the Company, regardless of whether that employee works in the same organization (subject to local law). All disclosures should be made through the Conflict of Interest Form.
Nepotism in Business Relationships: If your role involves participating in selecting, evaluating and/or doing business with a vendor or partner who employs a Family Member, Romantic Partner or Close Friend 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 vendor or partner. Disclose any such relationships to your manager and fill out the Conflict of Interest Form. A “Close Friend” is someone with whom you have a personal relationship that would impact your ability to evaluate their business proposal and/or performance objectively.

Working for Competitors: You, a Family Member or Romantic Partner 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 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, vendor) 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.)

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.
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.
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 vendors 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 vendors 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.
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 to regulate 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 be. Under no circumstances may an employee or any third party working on our behalf offer, give, seek, or receive a bribe, kickback, anything of value, or any form of illegal payment, 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.
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 customer transaction or vendor to prevent use of our resources to launder money, the funding of terrorism, or other criminal activity. It is important as part of our overall risk management program and to mitigate financial crimes risk that we are aware of risks associated with money laundering and comply with requirements and 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 customers 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.
Relations with Customers

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

The fact that most of our customers 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 these customers directly. Meeting with, speaking to, or corresponding with a customer is a valuable opportunity to reinforce our reputation for reliability and trustworthiness. If your role is not customer-facing, but you are engaged by a customer, gather as much information as possible, document that information, and forward the request to the Employee Escalations team. This team will further assist the customer.
Relations with Partners & Vendors

Our business partners and vendors are important stakeholders. We build strong relationships with partners and vendors 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 any other unethical business practices.

- Select partners and vendors 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 (where appropriate). Also, protect any confidential information or personal data that a vendor 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 for unpaid bills or liability for any damage caused by you or any member of your party during your stay.
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 Compass. 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 companies can 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 strong performance and never through unethical or illegal business practices. Antitrust and Competition Policy

You must never:

• Communicate or agree with a competitor(s) about prices, 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 customer/supplier.
• Agree with a competitor to set the terms or fix the outcome of a competitive bidding process, nor should you discuss bids 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.
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
Securities Trading Policy
Social Media Policy
Travel Expenses Policy

Forms
Employee Escalations
Security Event Report Form
Contract Approval Routing Form