

BOOKING HOLDINGS



Code of Conduct



OUR CODE, OUR COMMITMENT



To our worldwide team, partners, and stakeholders:

Ours is an incredible global business that enhances the lives of millions of people every day. Our mission is to **Make It Easier for Everyone to Experience the World**, and we are committed to accomplishing it by staying true to our values. Our values guide us as we continue to pursue innovation and sustainable growth in a technological and regulatory landscape that is changing faster than ever.

Our values give us purpose. We live our value of **Relentless Innovation** through our commitment to harnessing the latest advancements in technology to provide the best services to our customers. Whether they book their next trip or make a dinner reservation on one of our platforms, our customers can trust that we are listening, learning, and constantly innovating to make every booking experience a great experience, and that we strive to do it in a responsible and sustainable way. **This is all part of our collective commitment to our value of Absolute Integrity — the bond that unites us and is woven into everything we do.** This commitment is embodied in our Code of Conduct, which demands that we own our actions and decisions.

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

It is important to me and our entire leadership team that you speak up if you see something that doesn't look right or if you need guidance. We pledge to provide you with a safe environment that promotes trust and transparency. We do not tolerate retaliation against anyone who raises a concern in good faith.

Thank you for your dedication, hard work, and continued commitment to fostering a culture of integrity and inclusion and consistently delivering *The Right Results, The Right Way*.

A handwritten signature in black ink, appearing to read 'Glenn Fogel', with a long horizontal flourish extending to the right.

Glenn Fogel

President and Chief Executive Officer

OUR VALUES



EXPERIENCES OF EVERY KIND, FOR EVERYONE.

We believe that by making it easier for everyone to experience the world, we are doing our part to make humanity better.



RELENTLESS INNOVATION.

We should never feel satisfied with the status quo, and every day should begin with the question – how are we going to innovate today?



DIVERSITY GIVES US STRENGTH.

We are absolutely committed to diverse ideas, people, and experiences.



ABSOLUTE INTEGRITY.

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



THE SUM IS GREATER THAN OUR PARTS.

Our strength lies in our people, and our success is contingent upon our ability to work as one team to succeed in our mission to make it easier for everyone to experience the world.

THE RIGHT RESULTS THE RIGHT WAY

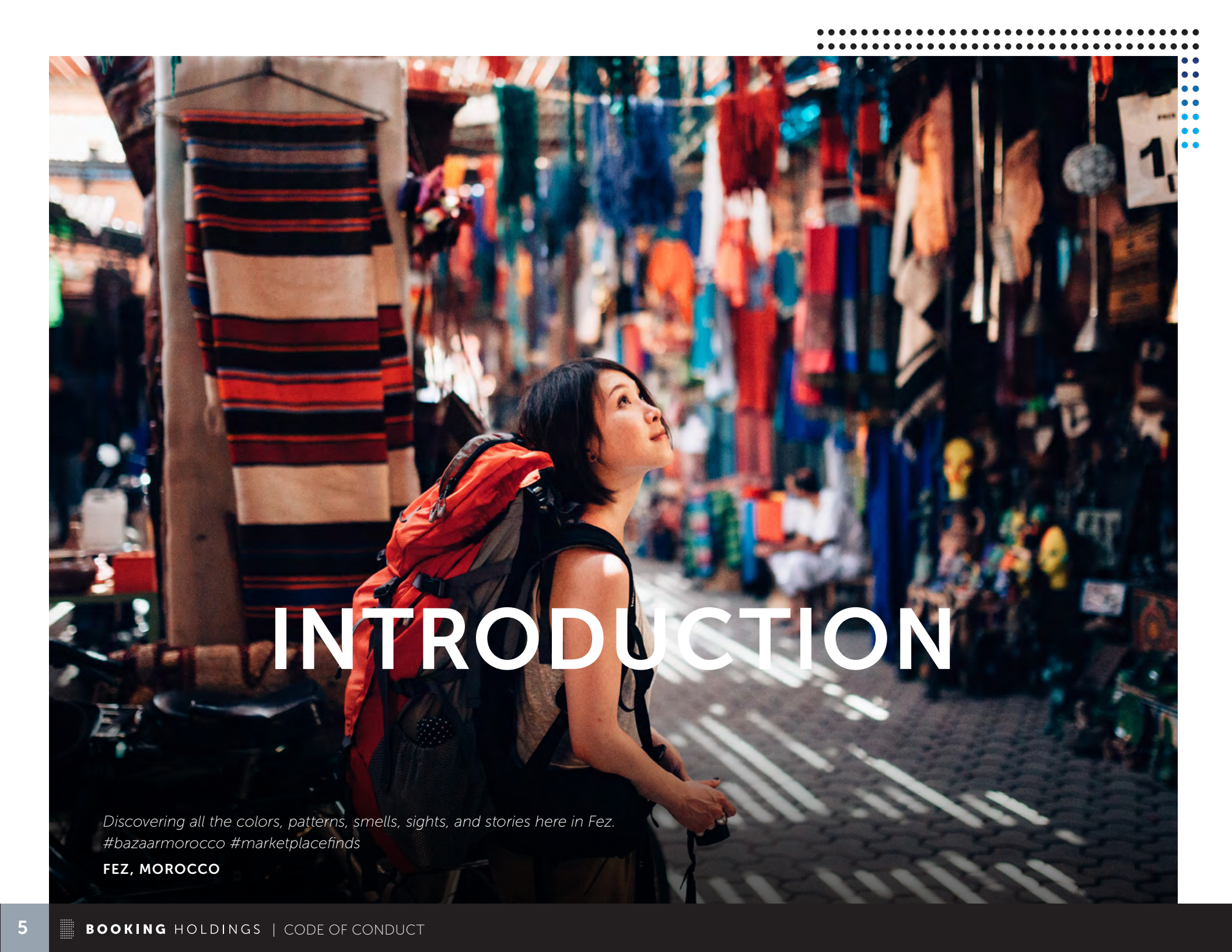
Booking Holdings is the world's leading provider of online travel and related services, provided to consumers and local partners in more than 230 countries and territories through five primary consumer-facing Brands: Booking.com, Priceline, Agoda, KAYAK, and OpenTable. Collectively, Booking Holdings operates in more than 40 languages across Europe, North America, South America, the Asia-Pacific region, the Middle East, and Africa.



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

A woman with a red backpack is looking up at a colorful market stall in Fez, Morocco. The stall is filled with various items, including a large striped bag and many colorful fabrics hanging from the ceiling. The scene is vibrant and bustling.

INTRODUCTION

Discovering all the colors, patterns, smells, sights, and stories here in Fez.
#bazaarmorocco #marketplacefinds

FEZ, MOROCCO

THE PURPOSE OF OUR CODE OF CONDUCT

We are committed to conducting business ethically, legally, and in a manner reflective of our tagline of achieving *The Right Results, The Right Way*.

This Code of Conduct (the “Code”) summarizes the legal, ethical, and regulatory requirements and policies that govern our global business. Likewise, this Code contains information on how to speak up and share concerns or obtain additional guidance when needed.

The Code is not intended to cover every issue or situation you may face. Instead, it is meant to be a guide in conjunction with the Company’s more detailed [policies](#). If you are ever unsure how to handle a specific situation, **ask before acting** and speak with your manager or one of the [resources](#) described in this Code.

THE SCOPE OF OUR CODE

It is important that you read the Code and abide by its principles. Our Code applies to every person working with, for, or on behalf of Booking Holdings or any of Booking Holdings’ Brand companies. This includes Booking.com, KAYAK, Priceline, Agoda, OpenTable, and each of their subsidiaries (as each may be individually and collectively referred to as the “Company” or “Booking Holdings”). All directors, officers, and employees of the Company, wherever they are located, are expected to be familiar with the Code and to adhere to the applicable principles and procedures that it sets forth. In addition, we have a [Supplier Code of Conduct](#) for the third parties who provide products or services to the Company.

OUR OBLIGATIONS

We are a global company committed to operating in compliance with all applicable laws in every country where we do business. Achieving results through illegal or unethical means is unacceptable. **We expect you not to do anything to compromise our commitment to integrity—we would rather lose business than gain it improperly.**

The Board of Directors has adopted this Code to ensure:

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



THE RIGHT RESULTS THE RIGHT WAY

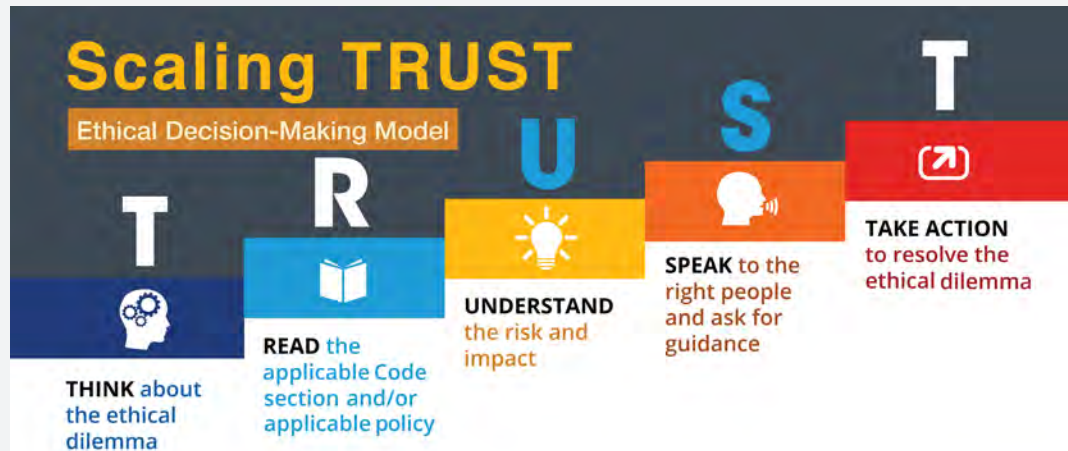
WHICH LAW APPLIES?

We conduct business in more than 230 countries and territories around the world. As a result, our operations are subject to the laws of many jurisdictions and organizations.

The cross-border nature of e-commerce poses important challenges for understanding how these laws may apply to our operations and business. The references in this Code and in other policies, as well as the laws in the countries where we do business, reflect the reality that we are truly a global company regulated by many different laws at the same time. In some instances, there may be a conflict between the applicable laws of two or more countries. When you encounter or suspect such a conflict, it is especially important that you consult with your Compliance & Ethics Officer or Legal Department for guidance.

Scaling TRUST

Ethical Decision-Making Model



★ If you are unsure or unclear, consult your local legal department.



If you ever encounter a situation where you are unsure of the right course of action, ask yourself the following questions:

- 01 Is the course of action legal?
- 02 Is the course of action the right thing to do?
- 03 Is the course of action consistent with our Code?
- 04 Would you feel okay if your actions were disclosed in the news? To your colleagues? To your family?

If you can't answer "yes" to all of these questions, then ask before acting!



CLICK TO ENLARGE

RESPONDING TO GOVERNMENT INQUIRIES

We occasionally receive inquiries from governmental agencies responsible for enforcing the law. **We will respond truthfully, promptly, and accurately to appropriate and legitimate government requests for information in the spirit of cooperation and transparency.** If you are contacted by a government agency, it is important that you immediately contact your Compliance & Ethics Officer or Legal Department.

Booking Holdings or your Brand company may have specific policies relating to site visits, dawn raids, or requests for information from a government agency. Be sure to know and understand these policies.



THE RIGHT RESULTS THE RIGHT WAY

Our ethical obligations as employees are to:

- Know the principles of the Code
- Make decisions consistent with the Code
- Be aware of, and comply with, the laws and regulations of the jurisdiction(s) where we/you do business
- Raise concerns of possible violations or acts that are not consistent with the Code

If you are unsure, ask before acting!

...and it is your responsibility to complete your online and in-person compliance trainings in a timely manner! They are an important part of our commitment to getting *The Right Results, The Right Way*.

Managers have additional responsibilities to:

- Promote compliance with the Code among your direct reports, both by example and by direction
- Report concerns that are brought to your attention by direct reports or otherwise
- Foster, engender, and reward a culture of accountability and integrity
- Monitor your team's compliance with the Code
- Enforce the Code consistently
- Ensure that appropriate compliance controls are both implemented and operating in your department or team
- Encourage employees to speak up and share concerns in good faith
- Ensure that the Company's zero-tolerance stance prohibiting retaliation against those who raise concerns in good faith is observed and strictly enforced



SPEAKING UP AND INVESTIGATION

Making new friends! #discoveregypt #vagabondlife

GIZA, EYGPT



SPEAKING UP AND INVESTIGATION

If you become aware of anything that violates, or appears to violate, this Code or any applicable law, regulation, or Company policy, you have a responsibility to immediately speak up and raise your concern.

Even if you do not have all the details, prompt concern raising is critical so that the appropriate personnel can investigate the issue, uncover the facts, and determine whether a violation actually occurred. Not only does swift concern raising help to prevent any further violations, but it also helps to preserve evidence and safeguard our employees, officers, directors, and the Company against any further wrongdoing. As long as you reasonably believe that a violation of the Code or any applicable law, regulation, or Company policy occurred, you are doing the right thing. **We have a zero-tolerance stance prohibiting retaliation against those who raise concerns in good faith.** Raising a concern in “good faith” means having an honest and sincere belief concerning the matter alleged.

We have established a number of ways to speak up and [raise concerns](#) so that you can select whatever avenue is most comfortable for you. No matter which option you select, your concern will be taken seriously and treated with sensitivity. In addition, the Company will endeavor to treat all concerns with the same degree of confidentiality and protection as the situation permits and/or as consistent with applicable law.

If you wish to raise a complaint to the Audit Committee related to accounting, internal accounting controls, or auditing matters, please refer to the [Audit Committee Procedures for Handling Helpline Complaints](#).



SPEAK UP RESOURCES

If you have a question about the Code or wish to raise a business conduct concern, you can contact any of the following resources:

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



THE COMPLIANCE HELPLINE

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



Our Compliance Helpline offers:

- Confidential concern raising and the choice to remain anonymous
- Telephone (toll-free) and web-based reporting options in 12 languages
- 24-hour/7-days-a-week access
- Ability to follow up on your concern, even if you choose to remain anonymous

Where local law permits, you have the ability to raise your concerns anonymously through the Compliance Helpline. That said, we encourage you to share your contact information so that we can reach out to you directly as needed. If you are willing to share your identity with us, the Company will endeavor to treat concerns with the same degree of confidentiality as the situation permits and/or as consistent with applicable law.

WHAT HAPPENS AFTER I RAISE A CONCERN?

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

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



RESOURCES

Our Ethics Ambassadors are fellow employees who help create awareness regarding ethics and compliance issues, promote our Code, policies, and values, and serve as a resource for those who want to learn more about compliance and ethics at the Company.

Our Ethics Ambassadors can provide guidance on how to ask questions and raise concerns. If you are interested in becoming an Ethics Ambassador in your location or department, speak with your Compliance & Ethics Officer to learn more about the program and to see if you qualify.



OUR NON-RETALIATION STANCE

Employees who [raise concerns](#) of wrongdoing perform an important service to the Company, and the Company will not tolerate retaliation in the form of an adverse employment decision (including separation, termination, demotion, suspension, loss of benefits, threats, harassment, or discrimination) against anyone for raising a concern in good faith.

Booking Holdings and every Brand company will act to protect good-faith concern raisers from retaliation, and will take appropriate disciplinary action against anyone who retaliates against them. Conversely, any bad-faith concern raising could lead to disciplinary action, up to and including dismissal.





WORKPLACE RESPECT

"I may not have gone where I intended to go, but I think I have ended up where I intended to be."
#roadtrippin #letsgopeakdistrict #getaway

DIVING THE PEAK DISTRICT NATIONAL PARK, ENGLAND

DIVERSITY AND INCLUSION

Our people are our greatest asset and strength, and we value every employee for their contributions to our success. We employ colleagues in more than 70 countries, so, in keeping with the global nature of our Company and business, we seek to work in a way that is consistent with local cultures and business customs, as long as they do not conflict with this Code and applicable legal requirements.

The diversity of our workforce contributes to our success through unique ideas, viewpoints, talents, and values. We firmly believe in a work environment where all individuals have equal opportunities and are treated with respect and dignity.

Employment is based upon individuals' abilities to contribute to our success by sharing their unique blend of ideas, viewpoints, talents, and values. Recognizing that our employees have diverse experiences and backgrounds, we seek to create an equally diverse and global workforce, and we expect our employees to embrace norms that support an inclusive culture, workplace, and society. The Company supports and abides by all laws and regulations that govern our employment practices, and we prohibit unlawful discrimination of any type.

The diversity of our workforce contributes to our success through unique ideas, viewpoints, talents, and values. We firmly believe in a work environment where all individuals have equal opportunities and are treated with respect and dignity.

THE RIGHT RESULTS THE RIGHT WAY

We do not unlawfully discriminate. We evaluate all employees and prospective employees on their merits and qualifications and never on individual characteristics, such as:

- Race, ethnicity, or color
- Religion
- Sex
- Sexual orientation
- Gender, gender identity, gender expression
- National origin
- Nationality, immigration status, citizenship, or ancestry
- Age
- Marital status
- Pregnancy, childbirth, and related medical conditions
- Disability
- Military service, military affiliation, and veteran status
- Any other characteristics that may be protected by our Company policy or the law

WORKPLACE CONDUCT, HARASSMENT, AND BULLYING

We all have the right to work in an environment where we are respected, safe, and secure. We expect all employees to respect this right and to act professionally. We do not tolerate the use of insulting, hurtful, threatening, or abusive comments. We should all be aware of and respect the diversity of viewpoints, beliefs, and values of all of our colleagues and should refrain from expressing or forwarding opinions about sensitive topics, such as politics or religion, that do not relate to the workplace, that negatively affect the workplace, or that interfere with the ability of you or your colleagues to do your jobs.

The Company prohibits any threats, bullying, or unlawful harassment of any type, including emotional, physical, or sexual harassment. Sexual harassment includes unwelcome sexual advances, unsolicited sexual attention, demands or requests for sexual favors, sexual innuendos, or other unwelcome verbal or physical conduct of a sexual nature. Sexual harassment can be directed at anyone, regardless of their gender, gender identification, sexual orientation, or any other individual or personal characteristics.

Sexual harassment includes unwelcome sexual advances, unsolicited sexual attention, demands or requests for sexual favors, sexual innuendos, or other unwelcome verbal or physical conduct of a sexual nature.

If you feel that you have been harassed or discriminated against or if you observe such behavior, you should immediately contact your manager, Compliance & Ethics Department, or Human Resources department so that the Company can take prompt and corrective action. Remember that we will not tolerate retaliation against anyone who raises a harassment or discrimination concern in good faith. For more information on this topic, please refer to the [Global Anti-Harassment and Anti-Discrimination Policy](#).

THE RIGHT RESULTS THE RIGHT WAY

Treat others with respect, dignity, and courtesy.

Actions that may be considered harassment include:

- Offensive or inappropriate comments or jokes
- Bullying
- Unwelcome physical contact or gestures
- Creating a hostile or intimidating work environment, including one in which employees may be driven to engage in inappropriate work practices to "fit in"
- Verbal or physical threats of any kind
- Explicit, derogatory pictures or texts inappropriate for the workplace
- Sexual advances or requests for sexual favors
- Racial or ethnic slurs

TAKE NOTE

We define "harassment" as any form of unwanted verbal, non-verbal, or physical conduct that occurs with the purpose or effect of violating the dignity of a person, in particular when it creates an intimidating, hostile, degrading, humiliating, or offensive environment.

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



WORKPLACE SAFETY

Respect for employees includes our commitment to a safe workplace that is free of both human and environmental hazards. We do not tolerate the misuse of drugs or alcohol. Working under the influence of drugs or alcohol or abusing prescription drugs may create unsafe working conditions for you and for those around you. Anyone who has a concern that a colleague may be misusing drugs or alcohol within the scope of their job, or who witnesses such misuse, should contact their manager or a Human Resources representative. Please also consult your [Company's policies](#) for further guidance on this topic.

We forbid all acts of violence and threatening behavior in the workplace. The possession of weapons, including knives and firearms, is prohibited on Company property. If the Company determines that an employee has acted violently or behaved in a threatening or inappropriate manner, appropriate disciplinary action will be taken, and appropriate law enforcement agencies may be contacted.

We must also be familiar with and abide by the requirements of any crisis management or business continuity plans and be prepared to adapt to changing circumstances regarding our workplace and working conditions.

Immediately [raise any concerns](#) of behavior or activity that jeopardize the health or safety of employees or the workplace.

If you feel that you or someone else is in immediate danger, you should call the local authorities or emergency services.



ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG)

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

BLOWING KISS TO HOLGATE GLACIER, ALASKA



ENVIRONMENTAL, SOCIAL, AND GOVERNANCE (ESG)

Booking Holdings is committed to making sure that there is a world worth experiencing in the present and the future. Our environmental, social, and governance initiatives, processes, and principles demonstrate our continued emphasis on being a sustainable and ethical global business.

SUSTAINABLE OPERATIONS

Running our own operations sustainably is a fundamental pillar of our [sustainability strategy](#). We set high expectations for our travel provider partners and operate our business according to the same criteria. This includes reducing our operational footprint and managing unavoidable impacts efficiently. We will continue driving our operations toward a net-zero carbon footprint in emissions. Booking Holdings strives to operate more sustainably and responsibly by collaborating and leveraging our experiences within our communities. Using our global reach, we can participate in hundreds of local initiatives and enhance positive impact for our communities at scale.

MORE SUSTAINABLE TRAVEL OPTIONS

More [sustainable travel](#) options can empower marginalized communities, broaden horizons, preserve cultural heritage, rejuvenate our travel ecosystem, and make certain that the planet—as well as its people, communities, habitats, and wildlife—are able to thrive today and into the future. Through product innovation, travel provider partner support, and industry collaboration, Booking Holdings and our Brands are committed to enabling more sustainable travel options for millions of customers worldwide.

As a company, Booking Holdings believes that it has a responsibility to help ensure that the world remains worth experiencing and to promote a more sustainable travel industry. Therefore, part of Booking Holdings' key areas of focus include:

- ➔ Supporting our partners to become more sustainable, which in turn increases the number of sustainable travel offerings; and
- ➔ Supporting our customers to make more sustainable choices.

HUMAN RIGHTS

We believe that the greatest and most positive human rights impact we can have is to make it easier for everyone to experience the world. We believe that travel can bring out the best in humanity by helping people interact and come to better understand different cultures and ways of life. It also provides both economic and social benefits to the communities that travelers visit.

We are committed to respecting and promoting human rights wherever we do business and to adhering to all applicable laws. Our commitment to respect and promote human rights is based on internationally recognized standards and principles, including the [United Nations \(UN\) Guiding Principles on Business and Human Rights](#). We expect our employees, business partners, and customers to share this commitment to help the travel industry respect and promote human rights globally.

As one of the world's leading online travel companies, we respect the human rights of our stakeholders by seeking to avoid infringing on the rights of others and working to address adverse human rights impacts. We prioritize our salient human rights risks and opportunities across our operations and value chain and seek to develop mitigation and remediation strategies.

YOUR ROLE IN RESPECTING AND PROMOTING HUMAN RIGHTS

We expect you to avoid causing or contributing to adverse human rights impacts through your business actions and to embody the respect for human rights in your behavior and in your work.

Speak up: Raise any human rights concerns, without fear of retaliation, to the [resources](#) listed in the Speaking Up and Investigation section, including the [Compliance Helpline](#).

Recognize: Think about how your projects and business relationships may impact on people's human rights – even inadvertently.

Reach Out: Speak to your manager and seek specialist advice from the Human Rights team (part of the Compliance & Ethics Department). The team will help you to assess, prevent, mitigate, or remedy any potential adverse human rights impact.

Be Responsible: Collaborate as one team to address and proactively prevent human rights risks.

To learn more about our commitment to respect and promote human rights, please see our [Human Rights Statement](#).

GOVERNANCE

Our strong corporate governance and ethical decision making help us find the right solutions the right way—for each other, our communities, and the world around us. We embed compliance and ethics in everything we do to allow us to achieve our mission: making it easier for everyone to experience the world.

Booking Holdings' corporate governance practices and policies provide the framework we use to fulfill our duties to stockholders and serve as a good corporate steward. We are committed to operating with integrity, honesty, accountability, and in compliance with applicable regulations.

Our values guide our actions at every level. Our vision is to have a best-in-class compliance and ethics program, characterized by a culture of inclusion and integrity that contributes, measurably, to the sustainable growth of our business and lives up to the Company's ubiquitous compliance and ethics tagline—*The Right Results, The Right Way*.

TAKING CARE OF OUR PEOPLE

Our employees drive our success and are fundamental in delivering on our mission to make it easier for everyone to experience the world. We strive to create an empowering and inclusive work environment through our continued focus on employee engagement, well-being, diversity and inclusion, talent management, and rewarding and recognizing that talent.

From flexible/hybrid working models to engagement programs, we facilitate activities and policies designed to bring our people together and support our international workforce.

Our business mission encourages understanding, acceptance, and a welcoming approach to broaden our horizons, meet new people and cultures, have new experiences, increase our knowledge, and grow to appreciate the world in which we live.

The health, safety, and well-being of our employees is of the utmost importance. Well-being is more than just mental health, and at Booking Holdings, our inclusive approach recognizes that well-being looks different based on identity and background.

Booking Holdings is a community of passionate learners, and we maintain a skills-centric and knowledge-sharing culture to encourage lifelong learning. We believe investing in people is a key element in our commitment to social responsibility.

We believe investing in people is a key element in our commitment to social responsibility.



ANTI-BRIBERY AND CORRUPTION

Bring on the lights! #northernlightsiceland #nightskychasers

NORTHERN LIGHTS, ICELAND

PROHIBITION OF BRIBERY AND CORRUPTION

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

We conduct business around the world and seek to comply with all applicable international laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. These laws strictly prohibit offering, giving, authorizing, requesting, or receiving bribes or kickbacks of any kind in connection with conducting our business. These laws also prohibit third parties from bribing others on behalf of the Company. We have developed a [Global Anti-Bribery and Corruption Policy](#) to provide you with further guidance about our expectations for all employees and third parties. The following principles, however, should serve as your guide:

OFFERING AND GIVING IMPROPER PAYMENTS: You may not offer, give, or authorize anything of value (e.g., cash, gifts, entertainment, hospitality, favors) to a government official or private party (e.g., vendor, supplier, contractor, client, or representative) for the purpose of obtaining or retaining business or gaining influence, favorable treatment, or any other advantage for the Company. This includes facilitating payments (sometimes called “expediting” payments), which are payments to secure or expedite routine governmental action. While these sorts of payments may be customary in some places, they are illegal in most countries, and they are always against our policy.

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

A “government official” includes the following:

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

REQUESTING AND RECEIVING IMPROPER PAYMENTS: You are also prohibited from requesting or receiving bribes from third parties, such as vendors, suppliers, contractors or client representatives. It is prohibited to do so either directly or indirectly.

Violations of anti-bribery laws are very serious and may result in criminal and civil fines and penalties for the Company and its directors, officers, and individual employees. These penalties can include imprisonment for those involved.

You will not be reprimanded for refusing to pay or accept a bribe, regardless of its adverse impact on revenue, sales, or other aspects of our business. The cost and damaging ramifications of bribery and corruption far outweigh any perceived short-term benefits.

ACCURATE BOOKS AND RECORDS

The Company’s books and records must accurately and fairly reflect transactions in a timely manner and in reasonable detail. False, misleading, incomplete, inaccurate, or artificial entries in the Company’s books and records are prohibited. No undisclosed or unrecorded accounts may be established for any purpose, and you must obtain sufficient documentation supporting the transactions with which you are involved. You also may not use personal funds to accomplish what is otherwise prohibited by this and other Company policies.

False, misleading, incomplete, inaccurate, or artificial entries in the Company’s books and records are prohibited.

TAKE NOTE

“Books and records” means all books and records, ledgers, employee records, customer lists, files, correspondence, and other records of every kind (whether written, electronic, or in another format) owned or used by the company, or in which the company’s assets, business, or transactions are otherwise reflected.

Common examples of “books and records” include:

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

DEALING WITH THIRD-PARTY AGENTS

Anti-bribery laws prohibit the Company from employing third-party agents to make corrupt payments on our behalf. The Company can be responsible for such payments where it can be reasonably concluded that the Company knew or should have known that such payments would be made.

It is therefore imperative that each of our third-party agents understands that they are strictly prohibited from paying or receiving any bribes (including facilitating payments) on our behalf. As such, all of the Company’s third-party agents who act on our behalf must be vetted, undergo due diligence, and be made aware of the Company’s expectation that they abide by relevant anti-bribery laws. Please work with your Compliance & Ethics Officer to ensure that our third-party agents are appropriately vetted.

The term “third-party agents” includes any entities or individuals who act on our behalf, including agents, contractors, consultants, corporate service companies, payroll providers, advertising agencies, and law firms.

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



FINANCIAL INTEGRITY AND REPORTING

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

YI PENG FESTIVAL, CHIANGMAI THAILAND

WORKPLACE FRAUD

Our business success depends on honest and transparent operations. We must all be committed to preventing fraud and detecting it promptly if it occurs so that the Company can quickly remedy the situation and minimize any adverse consequences.

Fraud means dishonest and deceptive activities intended to result in financial or personal gain or some other unfair advantage. Fraud can range from intentional distortion of financial statements to embezzlement, theft or misuse of Company assets, or exaggeration of expenses. The Company provides training and resources on the consequences of fraud, methods to prevent fraud, and the correct procedures for reporting suspected fraud. We also have internal controls and processes to detect fraud risks to our business. If you have any questions about fraud or fraud prevention, please ask your manager or contact one of our reporting channels.

We must all be committed to preventing fraud and detecting it promptly if it occurs so that the Company can quickly remedy the situation and minimize any adverse consequences.

FINANCIAL REPORTING, DISCLOSURE, AND INTERNAL CONTROLS

As a publicly-listed company, we are required to provide public disclosures, including financial information, about the Company. Our public statements, including our press releases and public filings, should not contain any incorrect or misleading information. Required filings with the U.S. Securities and Exchange Commission (SEC) must be complete, timely, and in full compliance with SEC requirements.

It is important that we accurately report financial and other information about the Company to the public. Failure to do so could result in liability for the Company and, in certain cases, our officers, directors, or employees, and could result in a loss of confidence in the Company by investors, analysts, and others.



We must all ensure that the Company maintains an adequate and effective system of internal controls, that such controls are not circumvented, and that our transactions are processed in a timely fashion in accordance with generally accepted accounting principles (GAAP) or other applicable local or statutory principles. We are responsible for devising and adhering to a system of internal controls designed to provide reasonable assurance that:

- ➔ Each transaction has been properly recorded and has been appropriately authorized by management;
- ➔ Company assets are appropriately safeguarded and used only in a manner consistent with management's authorization; and
- ➔ Each transaction is recorded in a manner sufficient to allow the Company to account for its assets and liabilities, as well as to prepare financial statements under appropriate accounting standards.

THE RIGHT RESULTS THE RIGHT WAY

If you are asked to prepare, submit, or approve a contract, payment, voucher, or any other Company document or record that does not accurately reflect the substance of the transaction, you should refuse to do so and immediately raise this conduct through one of our [speak up resources](#).

Similarly, you must never request that a third party (including a vendor, supplier, or consultant) submit a record that does not accurately reflect the substance of the transaction.

You are encouraged to come forward with any concerns if you suspect others may be either inadvertently or intentionally subverting or circumventing our internal controls.



ADDITIONAL RESPONSIBILITIES FOR DIRECTORS, OFFICERS, AND EMPLOYEES INVOLVED IN DISCLOSURE MATTERS

In addition, each director, officer, or employee involved in the Company's disclosure process is required to be familiar, and to comply, with the Company's disclosure controls and procedures, as well as all internal controls over financial reporting, to the extent these controls are relevant to their area of responsibility.

Each person having direct or supervisory authority regarding SEC filings, or any of the Company's other public financial communications, should take all appropriate steps, including consulting with other Company officers, to ensure full, fair, accurate, timely, and understandable disclosures.

Each director, officer, or employee who is involved in the Company's disclosure process must:

- ➔ Become familiar with the disclosure requirements applicable to the Company, as well as to the business and financial operations of the Company;
- ➔ Never knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, including the Company's independent auditors, governmental regulators, and self-regulatory organizations; and
- ➔ Properly review and critically analyze proposed disclosures for accuracy and completeness (or, where appropriate, delegate this task to others).



FINANCIAL CRIME, TAX EVASION, MONEY LAUNDERING, AND TERRORIST FINANCING

We are committed to complying with all applicable laws, rules, and regulations that combat financial crime in all of its forms, including tax evasion, money laundering, and terrorist financing. **Tax evasion** is failing to pay or deliberately underpaying taxes by concealing income or information from tax authorities. **Money laundering** is the process of concealing illicit funds or making them look as though they are legitimate. **Terrorist financing** is any activity that includes raising, storing, or moving funds obtained through illegal or legal means, to provide financing or financial support to specifically designated terrorists.

We must take steps to ensure that we only conduct business with reputable vendors, suppliers, contractors, customers, and clients involved in legitimate business activities with funds derived from legitimate sources. **We must never engage in any transaction or activity that is structured in a way that could appear to conceal illegal conduct or the tainted nature of the proceeds or assets involved.**

In addition to fulfilling our own tax obligations, we must never facilitate tax evasion by another party. This could arise if we knew a partner, supplier, or vendor was making false statements or hiding income, gains, or assets from tax authorities, but we failed to prevent it. If you suspect that a transaction or activity in which we are involved might involve any form of financial crime, contact your Legal Department or your Compliance & Ethics Officer immediately.

We must take steps to ensure that we only conduct business with reputable vendors, suppliers, contractors, customers, and clients involved in legitimate business activities with funds derived from legitimate sources.

THE RIGHT RESULTS THE RIGHT WAY

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

- In currencies other than those specified in the invoice, contract, or jurisdiction where the services will be performed
- To or from other countries with no apparent connection to the business
- In cash or cash equivalents
- To or from someone not party to the transaction
- To or from an account other than the normal business relationship account
- With multiple checks or drafts
- Where you recognize that there are overpayments
- Involving unknown or unnecessary intermediaries unless you are clear about their role
- With unnecessary complexity or no obvious legitimate business purpose
- Involving high-risk countries or counterparties
- Without an itemized invoice containing a clear description of services rendered

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

If you are unsure, ask before acting!



GIFTS, ENTERTAINMENT, AND CONFLICTS OF INTEREST

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

SIGHTSEEING, JAPAN

GIFTS AND ENTERTAINMENT

Giving and receiving business gifts or entertainment is a customary way to strengthen business relationships and, with some restrictions, is a lawful and acceptable business practice. However, gifts and entertainment must never compromise your business judgment or the integrity of the Company's business relationships.

In general, it is our policy that you may give and receive appropriate business gifts or entertainment in connection with your work with suppliers and other nongovernmental parties; however, all such gifts or entertainment must meet the following standards.

GIFTS

You can give or receive a gift from a person or entity that has or seeks a business relationship with the Company if: (i) you receive the approval of your manager; and (ii) the gift meets the following criteria:

- ➔ Is legal, customary, nominal (i.e., less than \$100 USD or foreign currency equivalent), and infrequent (i.e. not overly frequent from one source, creating a pattern);
- ➔ Does not look like a bribe or kickback and is consistent with the Company's [Global Anti-Bribery and Corruption Policy](#);
- ➔ Is not offered/given during contract negotiations, or within three months prior to contract renewal;
- ➔ Is not cash/cash equivalent; and
- ➔ Is not a gift card/certificate valued at \$50 USD (or foreign currency equivalent) or more.

ENTERTAINMENT

You can give or accept entertainment from a person or entity that has or seeks a business relationship with the Company if: (i) you receive the approval of your manager; and (ii) the entertainment meets the following criteria:

- ➔ The supplier or vendor is present;
- ➔ The entertainment is consistent with accepted business practices and infrequent; and
- ➔ The entertainment cannot be reasonably construed as payment for influencing or rewarding a decision or action.

Beware when doing business with government officials. Although providing gifts and entertainment to any party can raise issues, the risk is particularly significant when government officials are involved. You must not offer, provide, or accept any gifts or entertainment in connection with government or government official interaction without prior written approval from your Compliance & Ethics Department.

For further information, guidance, and exceptions, please consult your Brand's [Gifts and Entertainment Policy](#).

CONFLICTS OF INTEREST

We all have a responsibility to avoid conflicts of interest, which arise whenever our personal, social, or financial interests interfere, or even appear to interfere, with the interests of the Company.

If you encounter a situation that appears to present a perceived, potential, or actual conflict, or have a question about whether something constitutes a potential or actual conflict, you should complete your Brand's [Conflict of Interest Disclosure Form](#). For further information, definitions, and guidance, please consult the Company's [Conflicts of Interest Policy](#).

The following are some common examples of potential conflicts of interest:

OUTSIDE EMPLOYMENT AND OTHER PERSONAL ACTIVITIES

As a general rule, you may not hold outside employment if it could interfere with your ability to objectively and competently do your job at the Company. Outside employment and other personal activities could impair your ability to act in the Company's best interests or reduce your productivity, particularly if the second job is with a Company Competitor or Supplier or if the work hours overlap with your workday.

Outside employment does not just apply to traditional second jobs—it also refers to self-employment, business ownership or start-ups, professional, advisory, or consulting services, and gigs that can be performed during or outside the normal workday.

CORPORATE OPPORTUNITIES

You are prohibited from using corporate property, information, or position for personal gain and from competing against the Company. You may not take (or direct to a third party) a business opportunity that is discovered through the use of corporate property, information, or position, unless you have disclosed the opportunity and received written approval from your Brand's Compliance & Ethics Department.

Sometimes the line between personal and Company opportunities is difficult to draw, and there may be both personal and Company opportunities in certain activities. Please consult with your manager before using Company

property, information, or your position at the Company in a manner not solely for the benefit of the Company.

OUTSIDE BOARD SERVICE OR OTHER AFFILIATIONS

You must ensure that your outside board service or other personal affiliations and activities do not conflict with your obligation to act in the Company's best interests. You may not serve on a managing, advisory, or supervisory board of directors (or any similar authority or body) of any organization that supplies goods or services to the Company (including business partners) or competes with the Company unless you have disclosed it by completing your Brand's [Conflict of Interest Disclosure Form](#) and have received written approval from the Group Chief Compliance & Ethics Officer.

SIGNIFICANT FINANCIAL INTERESTS IN COMPETITORS OR SUPPLIERS

You may not hold a Significant Financial Interest in a Company Competitor or Supplier unless you have disclosed it by completing your Brand's Conflict of Interest Disclosure Form and have received written approval from the Group Chief Compliance & Ethics Officer.

A Significant Financial Interest in a Competitor or Supplier is:

- A direct monetary interest in a Competitor or Supplier where: (1) the interest is valued at \$100,000 or more (USD) for public companies or constitutes one percent (1%) or more of the entity's total equity for non-public companies; or (2) you currently have the ability to exercise control over the Competitor or Supplier because of the investment.
- This does not include indirect financial ownership, such as investment in a mutual fund or a managed account, where investment decisions are handled by a third party whom you do not have the ability to influence.

If you have any questions about what constitutes a Significant Financial Interest, please contact your Compliance & Ethics Officer.

FAMILY AND PERSONAL RELATIONSHIPS

EMPLOYEE RELATIONSHIPS

You must avoid situations where family or personal relationships conflict, or appear to conflict, with your obligation to act in the best interest of the Company. Certain personal relationships can:

- ➔ Interfere with employees' independent judgment
- ➔ Create employee morale issues
- ➔ Lead to claims of conflicts of interest or even sexual harassment
- ➔ Create the appearance of impropriety
- ➔ Result in favoritism or nepotism

It is the Company's expectation that you will take personal responsibility to ensure that you do not engage in relationships that disrupt or negatively impact the workplace.

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

Romantic or sexual relationships that meet this criteria, even if consensual, may ultimately result in conflict or difficulties in the workplace affecting the legitimate interests of the Company. If such a relationship currently exists or develops, it must be disclosed.

Although both employees involved are individually responsible for disclosure, a supervisor's failure to report their own such relationship will be regarded as a serious lapse in their management and constitute grounds for appropriate disciplinary action.

TAKE NOTE

"Family Member" is defined as:

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

"Personal Relationship" is defined as:

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



RELATIONSHIPS WITH SUPPLIERS AND COMPETITORS

It is also a conflict of interest to participate in, seek to influence, or derive personal benefit from business decisions related to a Supplier or Competitor if your Family Member or someone with whom you have a Personal Relationship works for, or derives benefit from, the Supplier or Competitor.

The Company selects all vendors, suppliers, and business partners, and makes all employment decisions, on the basis of the candidates' qualifications and not on the basis of any family connections or personal relationships.

Finally, it's important to understand that as circumstances change, a situation that previously did not present a conflict of interest may present one later. You have a continuing obligation to submit a disclosure form whenever a new conflict arises or there is a change with regard to a previously disclosed conflict.

THE RIGHT RESULTS THE RIGHT WAY

You must avoid relationships, investments, and opportunities where personal interests conflict with the Company's best interests. If you find it difficult to make a fair and impartial business decision on behalf of the Company because of competing personal interests, or if you otherwise become aware of a situation that may present a conflict of interest, please complete your Brand's [Conflict of Interest Disclosure Form](#). In many cases, the conflict can be resolved or mitigated through simple steps and/or controls.

POLITICAL AND CHARITABLE ACTIVITIES

You are free to participate in the political process and in charitable activities. However, unless you are participating in Company-sponsored or Company-authorized activities, you must do so on your own time and with your own resources. It is improper to use Company property, equipment, or time for personal activities. Additionally, you must participate in political or charitable activities as private citizens, not as representatives of the Company.

The Company may engage in public policy issues pertinent to the Company's interests, and may, with the approval of the Board of Directors or its designee, make political and charitable contributions as the law and our internal policies allow.

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



FAIR COMPETITION AND ANTITRUST

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

VIRGIN GORDA, BRITISH VIRGIN ISLANDS

FAIR COMPETITION AND ANTITRUST

We believe that honest and fair competition is good for our customers and other market participants and brings out the best in each of us, including our competitors. **We are committed to competing fairly and honestly in the marketplace.**

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

- Fix, coordinate, or control prices
- Facilitate collusive bidding or bid rigging
- Limit competition against other market participants
- Divide or allocate markets, territories, or customers
- Exchange or share any unpublished information concerning prices, profits, or profit margins, or any other competitive information, with a competitor

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





SANCTIONS AND EXPORT CONTROLS

Andiamo! #railwayheart #stazione #trainspotting

ROMA TERMINI RAILWAY STATION, ITALY

SANCTIONS & RESTRICTED TERRITORIES AND PARTIES

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

Under these laws, issues can arise in our relationships with vendors, suppliers, and other business partners and customers. We maintain internal guidelines regarding the allowable activities in various countries subject to sanctions. For further guidance in this area, you should consult your Legal or Compliance & Ethics Department or the Company's [Sanctions and Exports Controls Policy](#).

IMPORTS, EXPORTS, AND BOYCOTTS

If your role involves sending or receiving goods, such as information technology equipment, software, promotional materials, or other equipment across national borders, you have an obligation to learn and understand the applicable import and export laws (particularly with respect to dual use/military goods). These laws apply to transfers within and among Booking Holdings' Brand companies as well as to transfers with third parties such as vendors, licensors, and suppliers. For further guidance in this area, you should consult your Legal or Compliance & Ethics Department or the Company's [Sanctions and Exports Controls Policy](#).

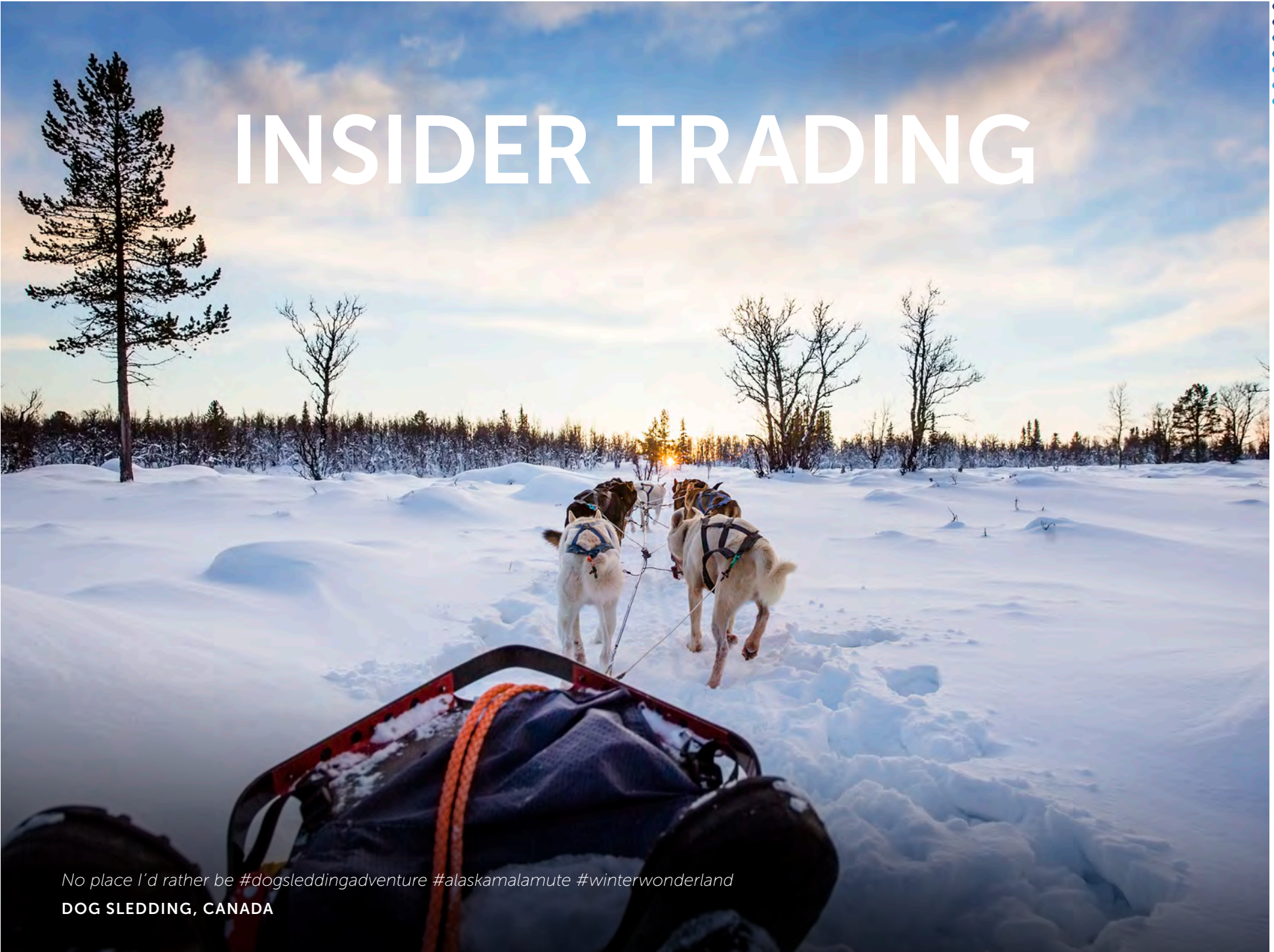
You must also avoid agreeing to participate in any illegal or unsanctioned boycotts of specific countries, governments, businesses, and individuals. If you are asked to participate in or agree to a boycott, contact your Legal or Compliance & Ethics Department.

THE RIGHT RESULTS THE RIGHT WAY

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

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

If you are unsure, ask before acting!



INSIDER TRADING

No place I'd rather be #dogsleddingadventure #alaskamalamute #winterwonderland

DOG SLEDDING, CANADA

INSIDER TRADING

We strictly prohibit insider trading. Insider trading laws prohibit insiders at a company from purchasing or selling securities of that company while in possession of material non-public information about that company. The laws also prohibit the disclosure of material non-public information to others ("tipping"), who then trade or otherwise profit from that disclosure. Tipping includes recommending, while in possession of material non-public information, to others that they trade even if the underlying material non-public information is not disclosed.

You must use caution and should never directly or indirectly trade Booking Holdings securities based upon non-public information. Additionally, you should never disclose confidential Company information that may be in your possession unless authorized to do so.



Material information includes information that may have or is likely to have a significant effect on the price of securities. Information is also material if there is a substantial likelihood that a reasonable person would consider it important in making an investment decision, including:

- Price-sensitive information
- Business-sensitive information
- Competition-sensitive information
- Unannounced financial results
- Significant new or lost contracts
- Major changes in management
- Government investigations (including dawn raids)
- Pending material lawsuits or material legal settlements
- Potential mergers, acquisitions, or divestments
- Significant new products or offerings

The stakes in this area are high, with non-compliance possibly resulting in sizable fines and imprisonment, as well as employee discipline (which can include termination). Consult with your Legal Department if you have any questions in this area and always refer to the Company's [Insider Trading Policy](#) before purchasing or selling Booking Holdings securities.



PRIVACY AND DATA SECURITY

Today is a good mood. #cafeparisien #sundaymorningmood

CAFE, PARIS

PRIVACY AND DATA SECURITY

We collect and process millions of instances of customer personal data, including names, credit card information, email addresses, and travel itineraries. Our customers provide their personal data to us with the expectation that we will safeguard it appropriately from misuse and/or unauthorized processing. Accordingly, the Company follows applicable privacy and data security laws and our own [Protecting Personal Data Policy](#) and [Data Security Policies](#) when collecting, processing, and handling the personal data of customers, fellow employees, and third parties.

You must at all times maintain the privacy, security, and confidentiality of all personal data entrusted to you, except when disclosure is authorized or legally mandated. Additionally, you must:

- ➔ Collect only the data that is required for a specific business activity
- ➔ Access personal data for legitimate business purposes only
- ➔ Store and dispose of personal data and other sensitive data in a secure manner
- ➔ Transmit personal data securely and only to authorized parties who are both obligated to use it only for its intended purpose and to protect its confidentiality
- ➔ Promptly raise any possible data incidents or security risks to your Information Security Officer

OUR PRIVACY PRINCIPLES

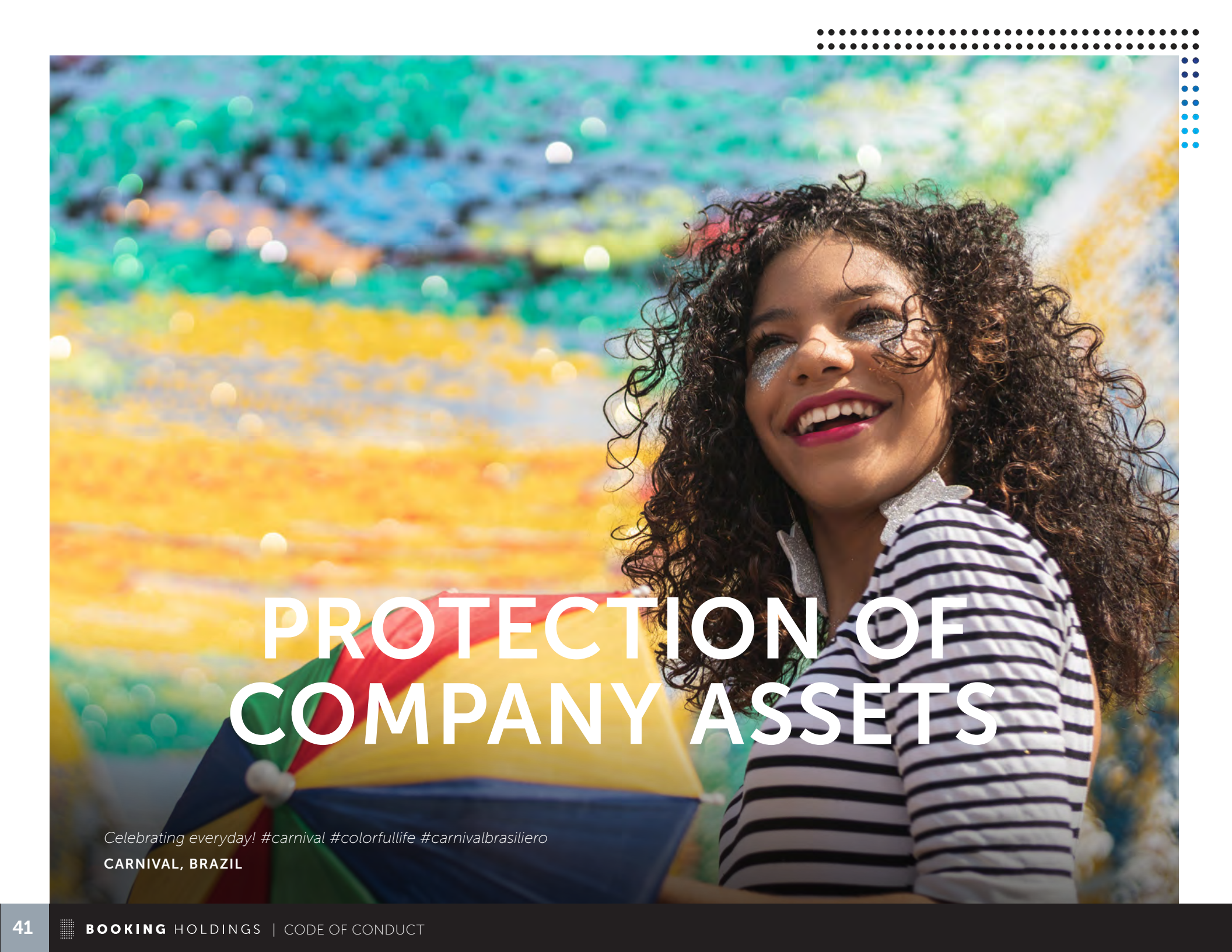
- 1 TRANSPARENCY.** We are transparent about our data practices.
- 2 EMBEDDED PRIVACY.** We build privacy into our products from start to finish.
- 3 CONTROL.** We put individuals in control, so that they have choices about and access to their information.
- 4 SECURITY.** We safeguard personal data.
- 5 PURPOSE.** We collect only what we need and use personal data to process your data in accordance with our disclosed data practices.
- 6 ACCOUNTABILITY.** We take responsibility for and do the right thing with personal data.

PROTECTING THE PERSONAL INFORMATION OF EMPLOYEES

We make a deliberate and concerted effort to maintain the privacy and security of our employees' personal data.

Employees that have access to, or work with, the personal data of our fellow colleagues have a responsibility to handle that data appropriately and to take all reasonable precautions to preserve its confidentiality in accordance with our privacy and data security policies.

Should you have any questions on this topic, please consult the applicable Booking Holdings or Brand [Data Security Policies](#), or contact your manager, your Privacy Officer, and/or your Information Security Officer.



PROTECTION OF COMPANY ASSETS

Celebrating everyday! #carnival #colorfullife #carnivalbrasiliro

CARNIVAL, BRAZIL

PROTECTION OF COMPANY ASSETS

You should protect the Company's assets and ensure their efficient use. Company assets include resources, such as office supplies, equipment (laptops, mobile phones, etc.), communications systems, and vehicles, as well as proprietary information, financial resources, and Company files, records, and documents.

PHYSICAL ASSETS

You should use Company assets responsibly and avoid waste, misuse, or theft of Company property. While Company assets are intended for legitimate business purposes only, the Company generally allows employees the reasonable, limited, personal use of electronic resources, including phones, computers, Internet connections, voicemail, and email.

Certain departments and country locations may implement more restrictive policies concerning use of Company resources for personal use, so please check with your manager or department head. If limited personal use is permitted in your department, it should be brief and occasional in nature and must not interfere with your work or responsibilities to the Company.

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

CONFIDENTIAL AND PROPRIETARY INFORMATION

Our obligation to safeguard Company assets includes protecting intellectual property, such as software code, patents, trade secrets, business plans, copyrights, and trademarks, as well as other confidential and proprietary Company information.

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

TAKE NOTE

The unauthorized or improper release of this information could negatively impact the Company's future success. You should therefore never disclose such information without proper authorization from your Legal Department and a nondisclosure agreement, as needed.



RESPECTING THE INTELLECTUAL PROPERTY OF OTHERS

We will respect the intellectual property rights of third parties and will not intentionally infringe or improperly use others' intellectual property.

In many cases, if we want to use the intellectual property of another person or company (including images or content available on the Internet), we need to purchase it or acquire a license to use it. It is your responsibility to determine whether we own or have the right to use any intellectual property you would like to use. If you are not sure, ask your Legal Department.

If we have a license to use another company's or person's intellectual property (including Open Source licenses), we must follow any limitations included in the license and any usage guidelines or other restrictions provided by the owner. Consult your Legal Department with questions.

RECORDS MANAGEMENT

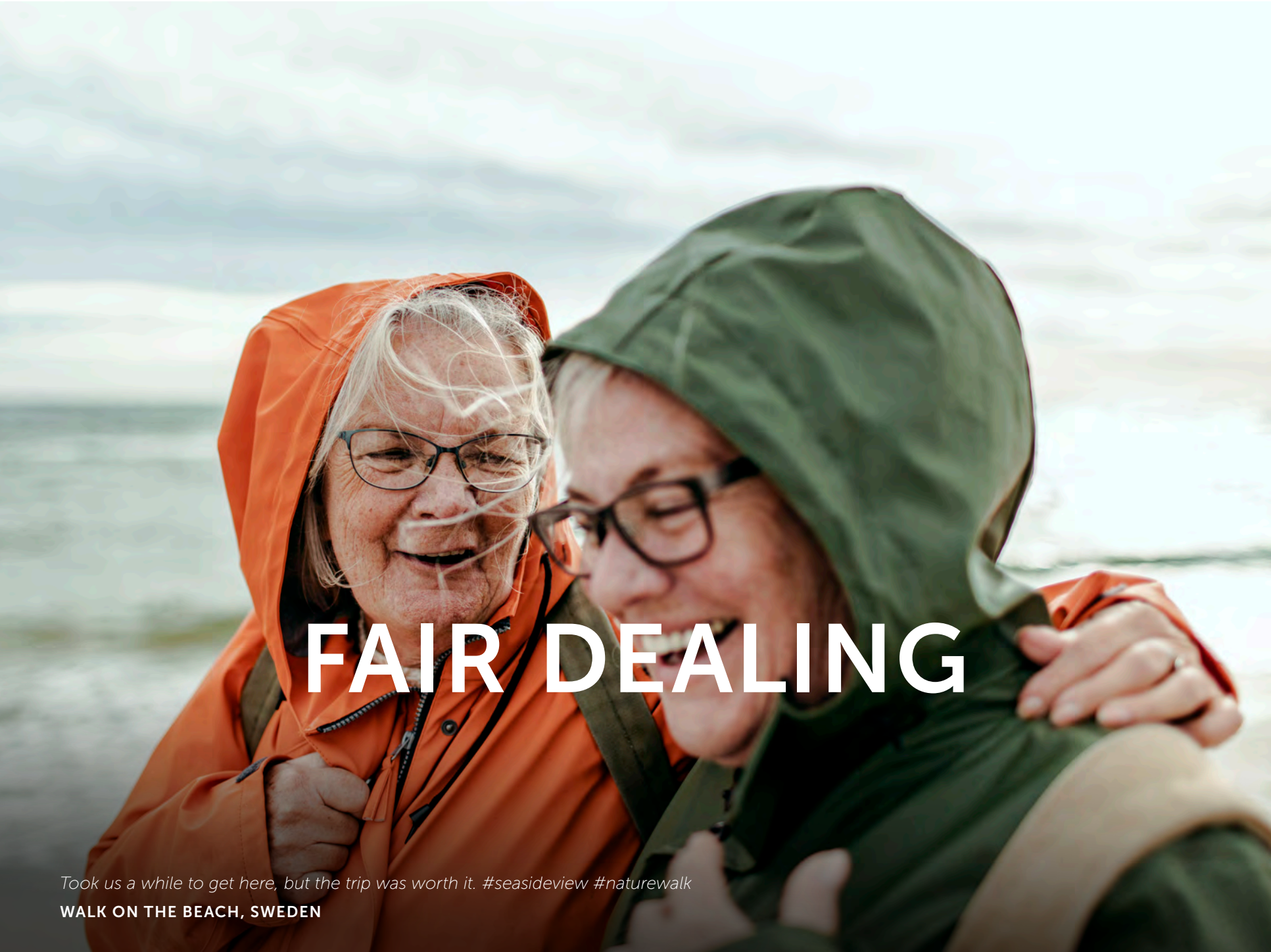
We each have a responsibility to create and maintain accurate business records and communications. The Company makes important business decisions based upon records created across the organization and their accuracy is vital.

All records should be maintained and destroyed in accordance with your Company's record retention policy. Never destroy records to conceal potential wrongdoing or hinder an investigation.

In the event that you receive a document hold notice related to litigation or an investigation, you must suspend any relevant document deletion as instructed in the hold notice and consult your Legal Department before taking any destruction action with respect to any business records relevant to the legal hold.

If you have questions on the appropriate handling and disposal of Company records, you should consult with your manager or your Legal Department.





FAIR DEALING

Took us a while to get here, but the trip was worth it. #seasideview #naturewalk

WALK ON THE BEACH, SWEDEN

FAIR DEALING

We do not seek competitive advantages through illegal or unethical business practices. We endeavor to deal fairly with our customers, service providers, suppliers, competitors, and other Company employees. We should not take unfair advantage of anyone through manipulation, deception, concealment, abuse of privileged information, or misrepresentation of material facts.

Our reputation with our customers is based on mutual respect and our commitment to providing truthful and transparent information about the services we provide. We make sure that information in our advertising, marketing, and other promotional materials is accurate and not misleading or deceptive.

Learning about our competitors must be done fairly, based on publicly available information, such as news reports and industry surveys, and always in compliance with all laws and regulations. Non-public competitive information can include information about a competitor's products, services, markets, pricing, trade secrets, or business plans. If you have any questions about what information you may seek or use in the course of business, consult your Legal Department.

Be mindful of the following:

- Information obtained by unethical means, including eavesdropping or the unintended receipt of an email from or about a third party
- Information obtained in exchange for compensation, employment considerations, gifts, or anything else of value
- Non-public information about a former employer solicited from a new hire





SOCIAL MEDIA AND PUBLIC COMMUNICATIONS

Airport hellos and goodbyes. #travelgram #airportlife

FAMILY, AIRPORT

SOCIAL MEDIA

You must exercise sound judgment and common sense when posting anywhere on the Internet in a way that could impact the Company. All posts should be in good taste and not embarrass or bring disrepute upon the Company. Posts must also not disclose proprietary or confidential information, such as Company performance, business plans, or pricing. In general, you should not post about Company matters, including the Company's performance, reputation, or other business interests unless you are an official Company spokesperson.

PERSONAL USE

Because we respect our employees' right to privacy, we usually do not take an interest in what anyone does outside of work, unless it adversely affects the workplace, other employees, or your job performance or threatens our reputation or legitimate business interests. Anything you post that could potentially affect the Company or its reputation will ultimately be your responsibility. When you engage in personal social media use, do so properly, exercising sound judgment and common sense.

Please refer to the [Global Social Media Policy and Guidelines](#) for further detail or if you have any questions on this topic.

COMMUNICATIONS WITH THE PUBLIC, INVESTORS, AND THE MEDIA

As a public company, we must communicate in a coordinated, coherent manner that aligns to our strategic goals and complies with standards set by regulatory bodies. As a result, we have designated certain spokespersons to speak for and on behalf of the Company, under the guidance of the Booking Holdings Communications Department or Brand Communications Departments, and unauthorized employees must refrain from doing so. All requests for public communications (including external speaking engagements, media inquiries, or requests for interviews) and requests from regulators, authorities, partners, vendors or other third parties should be referred to your Company's Communications team or Legal Department immediately. For further detail, please consult our [Global Communications Policy and Guidelines](#).



A photograph of a group of people sitting at an outdoor cafe table, clinking beer glasses in a toast. A woman in the foreground is smiling and looking up, wearing a teal sweater and large hoop earrings. A man in the background is also smiling. The scene is set in a European-style street with historic buildings and a traffic light visible in the background.

CONCLUSION

A successful day of sightseeing! #belgiumtrip #livetotravel

CAFE, BELGIUM

We must all work together to promote ethical and legal behavior and to make sure we always achieve *The Right Results, The Right Way*. To that end, we must strive to ensure compliance with both the letter and spirit of this Code. Always remember to:

- ➔ Refer to available Company resources, such as other [Company policies](#)
- ➔ Speak up and promptly raise concerns if you become aware of any suspected violations of this Code or applicable law, regulation, or Company policy
- ➔ Encourage colleagues to commit to high ethical standards
- ➔ **When in doubt, ask before acting!**

WAIVER/CONFLICT WITH OTHER POLICIES

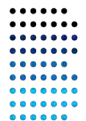
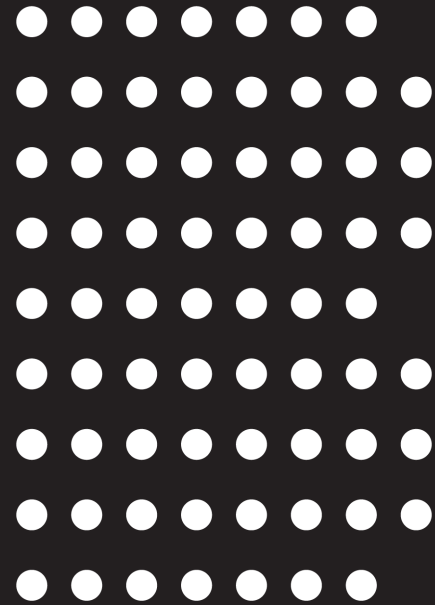
There may be rare circumstances when an exception must be made to the provisions of this Code. In these limited instances, Booking Holdings' Group Chief Compliance & Ethics Officer may grant a waiver. Only the Board of Directors, however, may waive a provision of this Code for one of Booking Holdings'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

In the event of a conflict between the provisions of the Code and provisions contained in other Company policies, the provisions and principles contained in the Code shall prevail. In the event of any such conflict, your Compliance & Ethics Department and/or Legal Department is vested with the primary authority to interpret how the Code applies to a given situation in the first instance, with review from the Group Chief Compliance & Ethics Officer and/or Booking Holdings General Counsel. Ultimate authority for the interpretation of the Code rests with Booking Holdings' Board of Directors.

This Code does not provide any rights, contractual or otherwise, to any third parties. The provisions of the Code are subject to revision, supplement, change, or amendment at any time as determined appropriate by the Company and in accordance with applicable law.

This Code of Conduct was last updated on October 17, 2024.





BOOKING HOLDINGS

