

expedia group™

the boarding pass





Table of Contents



Introduction	3
Integrity in Dealings with One Another	8
Integrity in Dealing with Company Information, Technology and Resources	12
Integrity in Dealing with Conflicts of Interest	25
Integrity in Dealings with Others	31
Helpful Resources	40



Team,

At Expedia Group, we believe travel is a force for good. Every day we work with our colleagues and partners to create memorable experiences for travelers around the world. In every interaction we have, it's critical we treat people fairly, act with integrity, behave ethically, and always follow the law.

The Boarding Pass, our Code of Conduct, serves as our guide in ensuring we're maintaining a culture of respect. Having a great culture means we must treat one another with dignity and empathy, so each of us feels supported, valued, and inspired to do impactful work.

This document is not just a set of rules – it shares who we are as an organization and what we stand for. It explains our values and policies in plain language and helps guide our decision-making. It does not, however, have all the answers. If you ever encounter a situation where you are unsure what to do, please reach out to your manager, the People Team, or the appropriate resources described here.

Thank you for your commitment to keeping Expedia Group a great workplace for all.



Ariane Gorin
CEO, Expedia Group



Our Values

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



Mission

Power global travel for everyone, everywhere

Purpose

Strengthen connections, broaden horizons and bridge divides

Values

Choose Fearlessly

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

Force Simplicity

Drive clarity and create momentum. Focus on impactful work.

Include Consciously

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

Trust Each Other

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

Go Get What's Next

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



Integrity

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

The Boarding Pass, Expedia Group's Employee Code of Conduct, helps you navigate legal and ethical questions by summarizing our expectations, policies, and applicable laws. The Boarding Pass applies anytime you are performing your job or are otherwise representing EG. This includes interactions in various areas of our shared professional lives, in our offices, in shared online spaces, on social media or at internal or external events where you represent EG. While the Boarding Pass is designed to help guide you, it does not replace the various global EG policies referenced within it. You are responsible for reviewing and understanding the policies, standards and laws that apply to your role.

The Boarding Pass is available to all employees on the [Basecamp Policies page](#). Employees are required to comply with the Boarding Pass. A violation of the Boarding Pass policies may result in disciplinary action up to and including termination (subject to and in accordance with applicable local law).

Links to these global EG policies can be found on the [Basecamp Policies page](#), and at the end of the document.

Take Action

EG is committed to fostering a safe and respectful work environment. We strive to do the right thing every time, but we recognize that mistakes or misaligned behavior can occur. If you experience or witness behavior that does not align with our values, whether involving you, your colleagues, travelers, or partners, you are encouraged and empowered to speak up. We want you to feel safe and supported, and there are several ways you can report your concerns:

- Speak with your manager, the People Team, or any other member of management.
- Speak to [Eric Allegakoen](#), VP of Corporate Audit Services or [Bob Dzielak](#), Chief Legal Officer.
- Call the Ethics Helpline, a confidential third-party service, to report a concern confidentially and, if you want, anonymously. Within the United States or Canada, call 1-888-571-6827. International numbers are available for other countries at www.expedia.ethicspoint.com
- Report your concern confidentially and, if you want, anonymously online at www.expedia.ethicspoint.com
- Visit the [Take Action](#) webpage to learn more about the different reporting methods available to you.



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 Service phone number of the relevant location. Honest reporting does not require that your suspicions are correct, but rather that the information you provide is accurate. It is, nevertheless, a violation of the Boarding Pass to make a false or misleading report or to obstruct any investigation. All employees are required to cooperate fully, honestly, and in good faith with Company investigations. For additional information regarding reporting misconduct and concerns, consult [EG's Global Whistleblower Policy](#) or [Take Action](#).

Zero Tolerance for Retaliation

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



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 everyone can fully engage and do their best work.

Every employee or job candidate at the Company will receive fair treatment and equal access to opportunities, regardless of characteristics such as race, ethnicity, religion, national origin, age, disability, veteran's status, sex, gender, sexual orientation, and gender identity or expression ("Protected Characteristics").

We will not tolerate discrimination of any kind, which is treating someone less favorably based upon a Protected Characteristic. This applies to all aspects of employment, including recruitment, hiring, training, compensation, promotion, discipline, and termination.





08

Integrity in Dealings with One Another



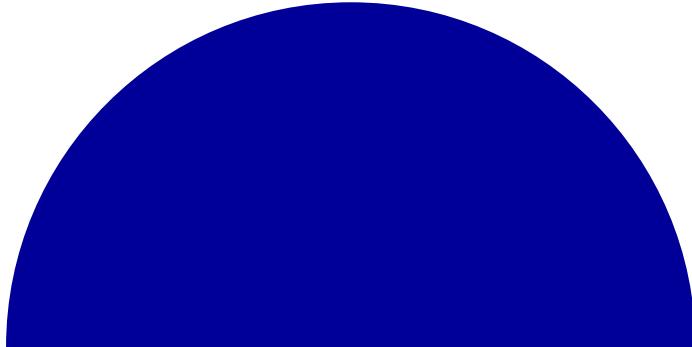
Treating Each Other with Respect

Creating a culture where everyone can focus on delivering impactful work and help each other succeed requires an environment of trust, respect, and accountability. We do not tolerate insulting, intimidating, violent, abusive, demeaning, harassing, or bullying conduct towards others. This applies to all of your interactions while you are representing the Company.

Bullying is defined as repeated and unreasonable behavior directed towards a person or group of people. Bullying can take the form of physical, verbal and non-verbal conduct and can extend to in-person interactions, as well as written communications in any company or private communication, including email, Slack, text messages, and social media. Although an isolated incident of unreasonable behavior (that is not egregious or severe) may not necessarily be considered 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, humiliating or degrading; using a person as the subject of jokes.
- Socially or physically excluding or disregarding a person in work-related activities.
- Shouting or raising one's voice at an individual in public or in private.
- Nonverbal threatening gestures, such as slamming doors or invading the space of the other person as an act of aggression.
- Constant criticism on matters unrelated or minimally related to the person's job performance; excessive monitoring/micro-managing.
- Manipulating the ability of someone to do their work (e.g., overloading, underloading, withholding information, assigning meaningless tasks, setting deadlines that cannot be met).
- Sabotaging or undermining of a person's work performance.
- Persistently 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, as both involve intimidating, offensive, and insulting behavior that may harm another person. EG defines harassment as any unwanted physical, verbal or non-verbal conduct which has the purpose or effect of undermining a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Harassment can also involve conduct of a sexual nature ("Sexual Harassment"), and the intent is not what matters - what matters is the impact on the person experiencing it. We strive to maintain a workplace free from inappropriate behavior and encourage employees to report any concerns.

Harassment may also constitute discrimination if it relates to a Protected Characteristic, and may be unlawful depending on the jurisdiction. All forms of harassment are unacceptable at Expedia Group, and unlawful harassment of any kind may result in disciplinary action up to and including termination of employment.

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

Depending on local law, examples of harassment and/or discrimination may include, but are not limited to:

- Unwanted physical conduct of contact.
- Unwelcome flirtation, persistent attention or social invitations, and/or unwelcome sexual advances or suggestions for sexual activity.
- Sexually suggestive, offensive jokes, gestures, or sounds.
- Displaying or sending pornographic, obscene, offensive 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 based on a Protected Characteristic.

This is not an exhaustive list. Conduct not described here 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 dignity, empathy and respect.

Safety and Health

We are committed to creating a safe and healthy work environment. If you notice any physical safety or health concerns in the workplace, please report it promptly to the appropriate on-site [Facilities](#) contact or to our 24/7 [Global Security Operations Center](#).

We prohibit the possession and/or use of illegal drugs while at work, during working hours or at Company or partner-sponsored business events. Weapons may not be carried onto EG premises, or while traveling or engaged in business for EG. Moreover, no employee may be impaired by drugs or alcohol while acting on behalf of EG. “Impaired” means your judgment is compromised or your ability to perform your work or function in a professional environment is diminished.

—————> [Responsible Drinking Policy](#)



12

Integrity in Dealing with Company Information, Technology and Resources



Business and Financial Records

Maintaining accurate business records is everyone's responsibility—not just for accounting and finance employees, but also because accurate recordkeeping 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 as well as our 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, Sarbanes Oxley (SOX) controls 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 all expense reimbursement claims are honest, accurate and within policy.

If you become aware that an internal control or procedure has been circumvented improperly or overridden, you should report the incident immediately to your manager or to the Ethics Helpline.

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





Trading Shares and Insider Information

What is Insider Trading?

Insider trading is using material, non-public information (“MNPI”) to try to make a profit or avoid a loss in the stock market. It gives the insider an unfair advantage and violates insider trading laws, potentially resulting in fines and even jail time. You must never:

- Trade in shares while in possession of MNPI, whether that information relates to EG or any other company, or
- Provide MNPI to someone else, even a relative, so that they can make a trade based on that information (“tipping”).

What is material, nonpublic information (MNPI)?

MNPI is information not generally known to the public that a reasonable investor would likely consider important when deciding whether to buy or sell a company’s stock. Examples of potential MNPI include:

- Operating or financial performance for a quarter that has not been reported publicly via earnings release,
- Projections of future earnings or losses,
- Significant acquisitions, divestitures, strategic partnerships, or other major transactions, and
- Major changes in strategy, management, or significant spending or cost saving programs.



Designated "Insiders" and Trading Windows

Individuals with regular access to MNPI are designated as "Insiders" under our [Securities Trading Policy](#) and may trade in EG or trivago shares only during approved trading windows, usually following each quarterly earnings announcement. If you have been identified as an Insider, you will receive regular emails from tradealert@expedia.com informing you of the expected timing of upcoming trading windows.

If you have questions about trading shares, your status as an Insider, or any related matters not addressed in our [Securities Trading Policy](#), you should email tradealert@expedia.com.





Proprietary and Confidential Information

EG's proprietary and confidential information, especially our intellectual property—innovations, tools, and trade secrets, etc.—enable us to develop new products and services and maintain a competitive advantage. Our trade secrets and much of our business information are confidential and, if disclosed, could be harmful to EG and travelers. We all have the responsibility of safeguarding EG's proprietary and confidential information. In performing your work, ensure that you don't compromise our security and confidentiality obligations in the handling of information about other employees, travelers and partners.

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

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

No Expedia policy is intended to preclude or dissuade U.S. employees from engaging in legally protected activities, such as discussing or disclosing wages, benefits, terms and conditions of employment, or working conditions. These rights do not authorize employees to obtain or distribute confidential information accessed in violation of Company policy. Employees who, because of their job duties, have access to confidential information must not disclose such information unless required in connection with such job duties.



Privacy and You

We all have a responsibility to handle personal data in a manner that is consistent with our privacy principles, our policies and processes, and privacy laws. It is a critical part of our mission to maintain trust and uphold our reputation across travelers, partners staff, third parties, and regulators.

EG's global privacy program is built around our "Privacy Principles", which are:

- Choice and Control
- Accountability
- Data Visibility
- Privacy Culture
- Responsible Use
- Data Protection

You are required to abide by these Privacy Principles in your handling of personal data as part of your role at EG. You must also comply with the requirements of the Privacy Passport, which sets out our enterprise-wide policy for the handling and protection of personal data at EG.

The Privacy Passport sets out clear requirements that apply to you, irrespective of your role, including:

- Completing mandatory annual training so that you understand the fundamentals of what personal data is and why it matters.
- Understanding when and how to start a Privacy Security Compliance ("PSC") Assessment so that privacy risks can be properly assessed.
- Familiarization of our data retention and deletion requirements.
- Knowing how to escalate any accidental or unlawful processing, or misuse of personal data.
- Understanding how to deal with sensitive personal data and privacy rights requests.
- Knowing how to contact us with any questions, concerns or issues relating to any aspect of our Global Privacy Program.

There may be additional requirements that apply to you that are role-specific and these will be set out in related standards to the Privacy Passport. You must familiarize yourself with the Privacy Passport and related standards for more detailed information.

→ [Privacy Passport](#)

The "Privacy Passport" policy does not apply to employees in Germany.



Using Information & 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, as well as (ii) EG's data protection and information security policies and standards, including the Boarding Pass.

This section up to the section "Company Resources" does not apply to employees in Germany. The use of IT systems in Germany is exclusively governed by the framework works agreement (Betriebsvereinbarung) on IT systems. For details please refer to the [Country Addendum for Germany](#).

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

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



We may carry out certain processing activities of our information technology and other systems or devices we provided to you as necessary in order to protect the Company's assets, protect it from any inadvertent loss of confidential data, and identify if you have been involved in phishing scams, fraud or activities in competition or inconsistent with your work for EG. Any irregularity in the use of our information or devices, will be investigated in a proportionate and reasonable manner to identify violations of law or breaches of your Employment Agreement or our policies and to protect the rights and interests of EG, our employees and other third parties.

In cases where an employee has used EG's assets and/or communications network to commit a crime or help others commit a crime, we will fully cooperate with law enforcement and any related government inquiries.





Use of Artificial Intelligence

The responsible use of Artificial Intelligence (“AI”) is essential to maintaining trust, safety, and integrity in our work. All employees, contractors, and partners are expected to use AI tools and systems in a manner that is safe, secure, ethical, and aligned with our organizational values. It is everyone’s responsibility to ensure that AI is used in ways that uphold our standards and contribute positively to our mission. Misuse of AI—whether intentional or accidental—can have serious consequences for individuals, communities, and the organization.

→ [Responsible AI](#)

Our Responsible AI Principles:

- Beneficial: Employees must use AI in ways that deliver clear value and positive outcomes for users, travelers, partners, or other stakeholders.
- Fair: Employees must proactively identify and mitigate potential biases, harms, or unintended consequences of their use of AI.
- Transparent: Employees must be transparent about their use of AI with relevant audiences and ensure AI outcomes remain explainable internally and externally.
- Accountable: Employees are accountable for their use of AI and its outcomes, ensuring human oversight and upholding appropriate security standards at all times.
- Privacy-Conscious: Employees must use AI in a way that respects and protects individual privacy and data rights and is compliant with applicable privacy laws and policies.

Do not copy or paste Expedia Group data or information into any non-approved generative AI or Large Language Models (“LLMs”). Doing so may expose sensitive or proprietary information and violate company policy. Always use [approved tools](#) when working with company data.



Company Resources

EG resources should only be used for legitimate business needs. You are expected to use Company resources and benefits responsibly and avoid waste. You must never misuse any Company assets or use our resources for personal gain. When traveling or conducting business on behalf of EG, adhere to EG's [Global Travel and Expense Policy](#) and properly document and report business expenses.

Employees must use their own form of payment (i.e., corporate or personal card in employee's name) for all travel purchases. Additional guidance on expensing and requesting reimbursements can be found [here](#).

You should not use a company credit card for personal expenses. If you need to pay EG back for a personal expense or for a cancelled purchase for which you have already been reimbursed, please consult [Procedure for Refunding EG](#).



Social Media

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



- Do not post or repost any illicit content or do anything online which could damage the reputation of EG and/or your own reputation as an EG employee. 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,” which is spoken words or writing that expresses prejudice against a particular group, especially based on a Protected Characteristic. 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 information about EG employees, travelers, or partners.
- Make clear your affiliation to EG when making any statements about EG on social media (e.g. online product reviews). If you identify yourself as an EG employee on social media, be sure not to imply that your views are endorsed by EG.
- Ensure that you are using your EG job title when representing yourself in any external capacity. This includes, but is not limited to, platforms like LinkedIn, public speaking engagements, networking functions, and business-related events. It's important that your title reflects the one assigned to you by the Company, to maintain clarity and consistency in how you and the organization are presented externally.

[Social Media Policy](#)

(This policy does not apply to employees in Germany)



Can I do this?

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

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

Can I do this?

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

A: This behavior is unacceptable and could risk damaging our reputation and business. Employees should not conduct themselves in a way that could hurt another person through intimidating, offensive and insulting behavior. This behavior is also in contravention of our policy on Anti-Bullying and Harassment described on pages 8-10 of this document.



25

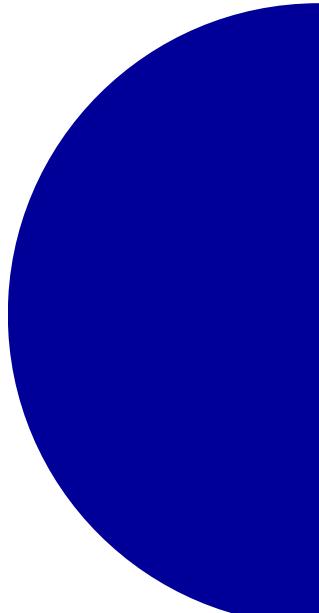
Integrity in Dealing with Conflicts of Interest



Conflicts of Interest

A circular image on the left side of the slide shows a woman with long brown hair, seen from behind, looking out over a cityscape. The city is visible in the distance, with buildings and greenery. The sky is clear and blue.

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.

A solid blue circle is located on the right side of the slide, partially overlapping the text area.

The following two sections (each "Nepotism") do not apply to employees in Germany. Employees in Germany are not required to disclose every case of a Personal Relationship at work. Exceptions may apply in case of a conflict of interest. Please refer to the [Country Addendum for Germany](#) for details.



Nepotism at work:

In order to avoid real or perceived nepotism at work, employees cannot hire or supervise a person with whom they have a “Personal Relationship”. Personal Relationships may include, but are not limited to, family members (spouse, domestic partner, parent, grandparent, child, stepchild, sibling, aunt, uncle, niece, nephew, first cousin or in-laws), people you live with, and anyone with whom you are engaged in a romantic or intimate relationship.

Additionally, employees cannot, for example, provide performance or job interview feedback, or otherwise influence hiring, compensation, or promotion decisions concerning a person with whom they have a Personal Relationship. Employees who refer job candidates through EG’s employee referral program cannot be on the interview panel of the job candidate they referred. Similarly, employees who have a Personal Relationship with a candidate, cannot be on the interview panel or provide feedback for that candidate.

All disclosures and questions about potential conflicts of interest 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 partner in which you have an interest or a Personal Relationship that could create a conflict (e.g., if you have a Personal Relationship with a decision-maker at the partner) -- you must remove yourself from the procurement or selection process and refrain from participating in managing the business relationship and evaluating the partner. You should also disclose any personal relationships that would impact your ability to evaluate a party’s business proposal and/or performance objectively. Disclose any such relationships to your manager and fill out the [Conflict of Interest Form](#).



Outside employment and professional opportunities:

EG employees are generally permitted to pursue outside business and professional opportunities provided prior approval is obtained and the position does not create a conflict of interest. An outside opportunity such as owning a business, having a second job, or serving on a board would create a conflict of interest if it: (1) interferes with your ability to perform your EG job responsibilities (e.g., time commitment), (2) interferes with your ability to act in the best interests of EG (e.g., working for a partner, or a current or likely future EG competitor) or (3) risks damaging EG's business or reputation (e.g., blogging about your work at EG, disclosing EG's confidential information to a third party).

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

Additionally, to avoid the appearance of a conflict of interest or an actual conflict of interest, you should remove yourself from any EG decision-making process or other business dealings with any outside business or organization with which you are currently engaged or in which you otherwise have a personal or financial interest.

If you are considering an outside business opportunity or are currently engaged in outside employment, first disclose the activity to your manager and obtain their approval. Next, initiate the formal review process by completing the [Conflict of Interest Form](#) and certifying your manager's approval.

Working for Competitors:

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

Investments:

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



[Conflict of Interest Policy](#)



Can I do this?

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

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

Can I do this?

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

A: Serving as a member of an external advisory board is generally permitted so long as (1) the organization or company does not compete with EG’s business either directly or indirectly, (2) your service would not create an unreasonable risk of disclosing EG’s trade secrets or competitive/confidential business information, and (3) the time commitment involved would not interfere with your EG responsibilities.

Situations involving potential conflicts of interest, including service on advisory boards, may not always be clear. If you need further guidance, please fill out the [Conflict of Interest Form](#).



Gifts & 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 have benefited from external parties.

When offering or accepting gifts follow these core principles:

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

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



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



31

Integrity in Dealings with Others



Corrupt Practices and Sanctions

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

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

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

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](#).

Additionally, Expedia Group and its subsidiaries are obligated to comply with economic and trade sanctions administered by the U.S. Department of Treasury's Office of Foreign Asset Control ("OFAC"), as well as other relevant authorities. These sanctions programs restrict EG's ability to work with certain individuals and entities on "blocked parties" lists, such as OFAC's Specially Designated Nationals list. Additionally, sanctions programs limit EG's ability to operate in certain regions (e.g., Cuba, Iran, North Korea, Syria) and/or to engage in certain types of transactions with individuals or entities in those regions. These regulations are complex and change regularly, so please seek guidance from the Legal Department if you have any questions or concerns about potential dealings with sanctioned regions or parties.

[US Economic Sanctions Compliance Policy](#)



Money Laundering

Money laundering is the concealment of the proceeds of crime, typically by means of transfers involving foreign banks or legitimate businesses. We must exercise care and good judgment when handling payments, whether in connection with a traveler transaction or supplier to prevent the use of our resources to launder money, the funding of terrorism, or other criminal activity.

We must ensure that we make payments for goods and services through approved and documented payment procedures. We only conduct business with travelers and partners 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.
- Never offer or accept gifts of cash or cash equivalents.
- Make or receive payments only through EG approved payment methods to or from legitimate businesses and only for legitimate bookings, contracts, goods, or services.

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

—————> [Anti-Money Laundering Policy](#)



Relations with Travelers

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

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





Relations with Partners

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

You should:

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



Contracting with Partners

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

→ [Global Procurement Policy](#)

You should:

- 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](#) "CARF" or Ironclad (EG's contract lifecycle management tool).
- 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 approves the contract may not necessarily have the authority to sign the contract and vice versa.)
- For teams not using Ironclad, ensure signed contracts and CARFs are sent to exconadm@expedia.com for loading into our contracts database.



Relations with Competitors

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

→ [Antitrust and Competition Policy](#)

You must never:

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

Gathering Information about Competitors

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

You must never:

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



Expedia Group Cares

Think global. Give locally.

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

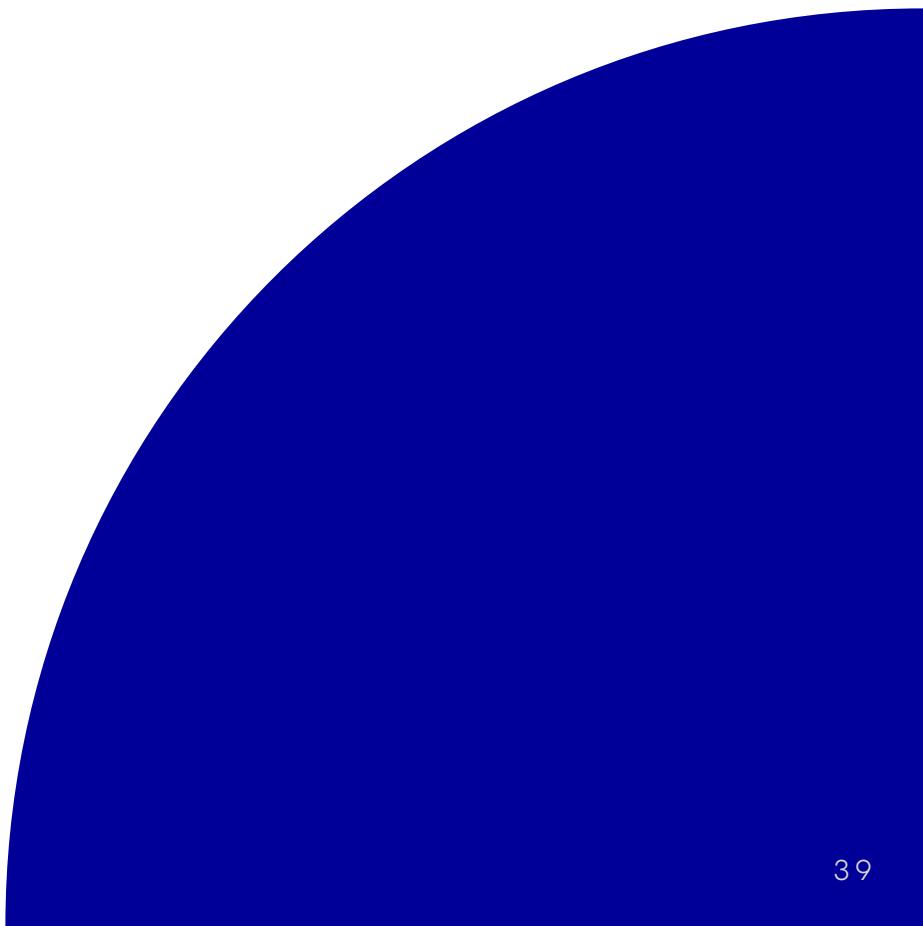
We offer gift matching, through which we match employees' charitable donations up to USD \$10,000 (or the local currency equivalent) per employee per year. This enables employees to double the impact of their donations to qualified charitable organizations of their choice. We also donate USD \$30 (or the local currency equivalent) per hour for each hour an employee volunteers with a qualified charity, up to USD \$2,000 (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, you can visit the [Matching Programs](#) page on Basecamp.





Human Rights & Modern Slavery

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





Helpful Resources

Ethics Helpline

To submit a web intake form:

www.expedia.ethicspoint.com

Within the United States or Canada, call 1-888-571-6827. Outside the US, phone numbers are available at

www.expedia.ethicspoint.com

To ask questions:

[Ask Legal](#)

[Gifts & Entertainment](#)

[Conflict of Interest](#)

[Frequently Asked Questions](#)

[Inclusion & Diversity](#)

EG Global 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](#)

[Global Travel and Expense Policy](#)

[Information Classification Policy](#)

[Information Handling Security Standard](#)

[Privacy Passport](#)

[Responsible Drinking Policy](#)

[Securities Trading Policy](#)

[Social Media Policy](#)

Forms

[Employee Escalations](#)

[Security Event Report Form](#)

[Contract Approval Routing Form](#)

