

MODERN SLAVERY STATEMENT

INTRODUCTION

This Modern Slavery Statement sets out the actions taken by Booking Holdings Inc. and the Booking Holdings corporate group (“we, us, and our”) to prevent Modern Slavery. We prepared this Statement in consultation with our brands and subsidiaries and in accordance with the UK Modern Slavery Act 2015 and Australia’s Commonwealth Modern Slavery Act 2018 (together, the Modern Slavery Acts), in respect of the financial year ending on December 31, 2022.



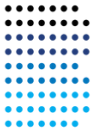
OUR BUSINESS

Booking Holdings Inc. is the world’s leading provider of online travel and related services, provided to consumers and partners in more than 220 countries and territories through six primary consumer-facing brands: Booking.com, Priceline, Agoda, Rentalcars.com, KAYAK, and OpenTable. Our mission is to make it easier for everyone to experience the world.

Through our consumer-facing brands, we offer platforms where customers can book different types of accommodations, car rentals, flights, taxi services (pre-book or on-demand), attractions, restaurants, and packages from travel service providers all over the world. Customers can also purchase various ancillary products, such as breakfast and insurance, on our platforms.

We recognize that Modern Slavery in all its forms (including slavery, human trafficking, forced labor, debt bondage, descent-based slavery, servitude, child slavery, and forced and early marriage) is a global issue and an increasing problem.

We employ over 20,000 employees across over 70 countries. We have a zero-tolerance approach to Modern Slavery within our own organization, supply chain, contractors, and with our partners and affiliate partners. At all levels, there is an intrinsic expectation to report any and all concerns through appropriate reporting channels and management is required to act upon them. The use of our [Helpline](#) is not restricted to only our employees—any external party can report concerns of Modern Slavery through our Helpline.



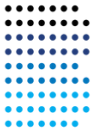
OUR OPERATIONS AND SUPPLY CHAIN

Our brands operate platforms providing travel-related services from offices located in Asia, Africa, Central and South America, Europe, the Middle East, and North America. A portion of our customer support operations have been outsourced to companies based in Asia, Central and South America, Europe, the Middle East, and North America.

Our direct business operations include providing intermediary booking services to customers for accommodations, attractions, B2B products, car rentals, cruises, flights, insurance, metasearch services (directing customers to bookings with travel service providers or online travel agents), packages and bundles, public transport, restaurants, taxi services (on demand and pre-booked), and travel search engines. Our supply chains include aggregators, global delivery systems, intermediaries, wholesalers, and direct third-party travel service providers. KAYAK operates a limited number of hotels in the United States and Mexico, which are managed by a third party.

As a company that facilitates global travel, we recognize that there are potential risks of Modern Slavery and human trafficking in our supply chain, including in sectors where elevated Modern Slavery risks have been identified, such as those in the accommodation, cruise, retail, food, and transportation sectors. Risks also may exist in connection with routine office activity support, such as cleaning services and office supplies.





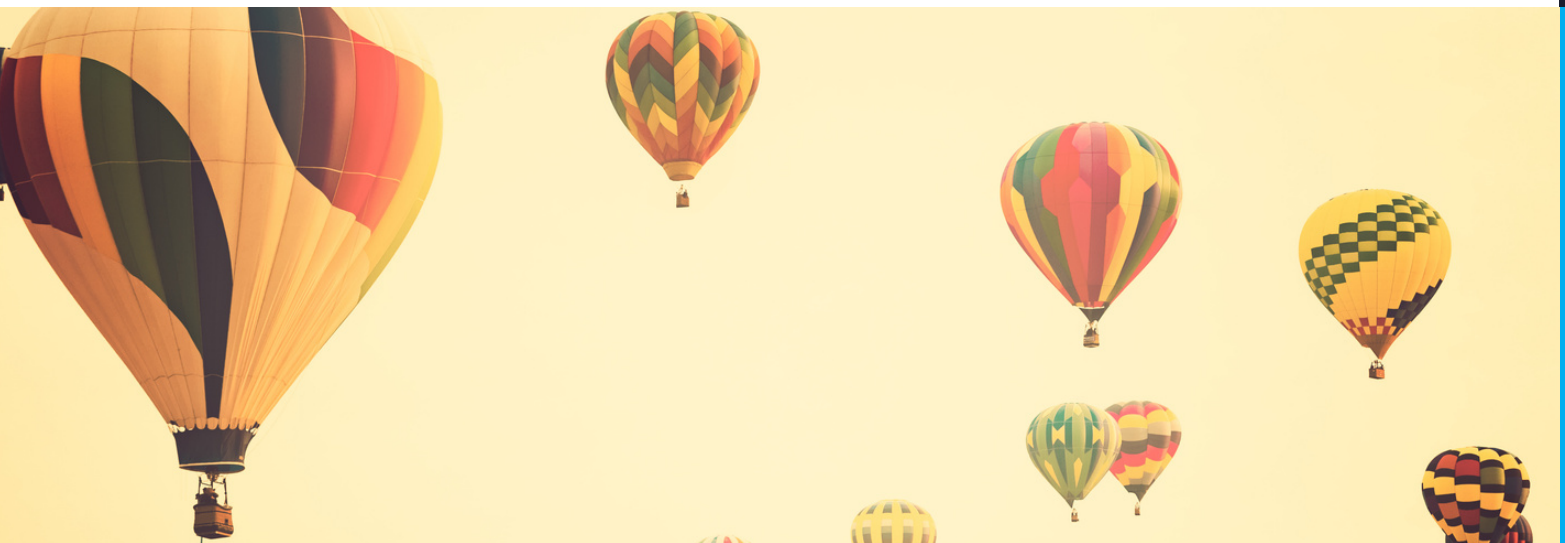
OUR POLICIES

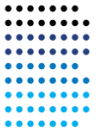
Our Core Values, [Code of Conduct](#), and corporate policies all reflect and convey our commitment and adherence to human rights and our zero-tolerance approach to Modern Slavery within any part of our business and our supply chains.

We provide a reporting Helpline and place a duty upon all employees to report either potential or actual violations of our policies, including potential or actual Modern Slavery, to their line manager, the Compliance Team, or the [Helpline](#). We have a zero-tolerance stance on retaliation against whistleblowers who report in good faith and our non-retaliation stance is set out in our Code of Conduct. We take all allegations seriously. All reports received through the Helpline are addressed and if appropriate, remedial action is taken. Annually, we publish an internal compliance report where colleagues can see aggregated data on reports the compliance team has received through the Helpline and other means.

Our [Supplier Code of Conduct](#) outlines that we expect suppliers to adhere to human rights, workplace respect, and diversity and inclusion principles, while acknowledging that this remains our suppliers' responsibility. Under no circumstances should a supplier use forced labor, whether in the form of compulsory or trafficked labor, bonded labor, indentured labor, or other forms. Mental and physical coercion, slavery, and human trafficking are prohibited. Suppliers are also directed to the Helpline to report any breaches of the Supplier Code of Conduct.

Additionally, Booking.com accommodation partners, as well as other suppliers and travelers, are encouraged to report any violations of the Supplier Code of Conduct by directly contacting Booking.com's partner or customer services directly. These reports are redirected internally to our Trust & Safety team which will, then, perform a thorough assessment of the report and take appropriate remediation action.





ACTIONS COMPLETED SO FAR

After assessing and considering the impact of the Modern Slavery Acts on our business, we completed the following actions, which we continue to evaluate, review through various measures, and enhance where appropriate.

[The UK Modern Slavery Registry](#) – On March 11, 2021, the UK Government launched a Modern Slavery Statement Registry. Our UK incorporated entities submitted our 2021 Modern Slavery Statement to the registry for review and verification with our Statement being accepted and published. They are committed to submitting all subsequent Statements to the Registry.

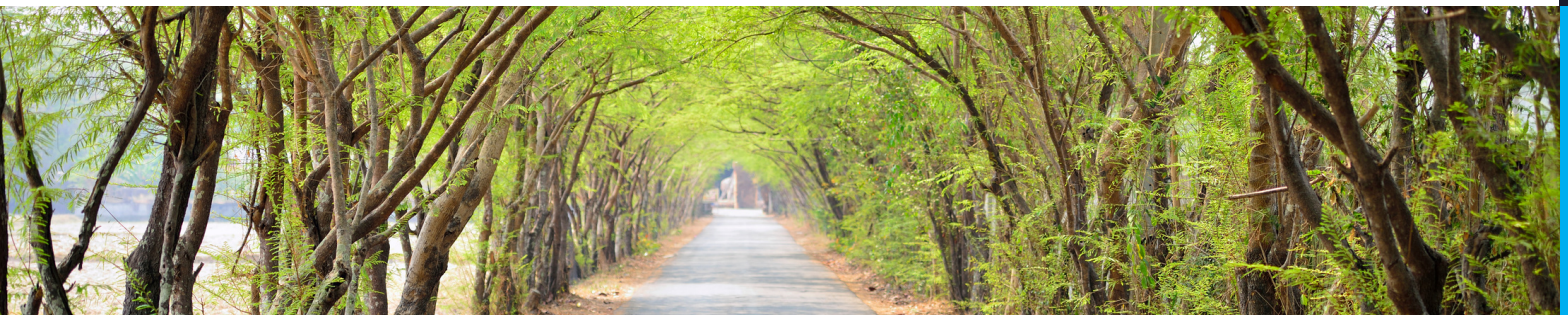
[Fair Pay](#) – We have been and remain committed to paying our employees a fair salary and benchmark salaries annually.

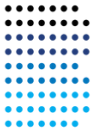
[Human Rights Statement](#) – In 2022 we released a company-wide human rights statement, which sets out our commitment to promoting human rights through travel, our expectations of our employees, customers, suppliers, partners, and affiliate partners to respect and promote human rights, our prioritization of salient human rights risks and opportunities, and our governance of these risks.

[Booking Holdings Sustainability Report](#) – We report on our commitments and progress on human rights topics in our annual Sustainability Report.

[Contractual Clauses](#) – We continue to review and update our contractual clauses and terms and agreements with a view to requiring our suppliers to adhere to legal protections against Modern Slavery. BHI and Booking.com's standard supply contracts include provisions obligating suppliers to comply with the UK Modern Slavery Act, and all of our brands require compliance with equivalent local laws and regulations, or code of conduct principles, where applicable. We would rather lose business than achieve it through unethical or illegal means. If, after inquiry, any organization within our supply chain is unable to demonstrate its commitment to these obligations, either it will not be taken on as a supplier or we will seek to terminate existing services.

Varying contractual terms and conditions on ethical business, fair working practices, and compliance with applicable legislation are included in new, renewed, and existing agreements with suppliers and partners. Where relevant, suppliers and partners agree to terms and conditions which oblige conduct consistent with the Modern Slavery Acts. Suppliers are also vetted by our restricted party sanctions screening and verification process.





ACTIONS COMPLETED SO FAR (CONT.)

Screening and Due Diligence – We conduct screening to detect parties and organizations that are subject to restrictions, including those associated with Modern Slavery and human trafficking offenses under applicable sanctions regimes. Should any parties fail the screening process, we have the ability to suspend and, if necessary, terminate our relationship(s) with them.

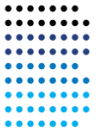
Helpline – We continue to promote the Helpline reporting facility to encourage all employees, as well as external stakeholders, to report any perceived or actual ethics and compliance breaches. All reports are addressed, and action is taken where appropriate. We have a zero-tolerance stance on retaliation against whistleblowers who report in good faith and our non-retaliation stance is set out in our Code of Conduct. We have a specific tutorial on how to use the Helpline in an effort to encourage its use.

Training – Booking.com has partnered with ECPAT-USA to develop human trafficking and child exploitation training for both internal teams and Booking.com accommodation partners. This will help Booking.com better assess, mitigate, and remedy reports of potential human trafficking that it receives, and will help partners identify signs of trafficking and how best to respond and report suspected trafficking at their accommodation site.

Partnerships and Engagement – Booking.com is a member of The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism and is working on internal policies and processes to address the risk of child exploitation in its supply chain. We are further working to expand our collaboration with experts in this space to improve our ability to detect, react, and prevent human trafficking and Modern Slavery risks in our operations and supply chain.

Regulatory review – We monitor regulatory developments of the UK Modern Slavery Act 2015 and Australia's Commonwealth Modern Slavery Act 2018 and are committed to promptly implementing any changes / requirements that come into effect.





FUTURE ACTIONS

Supplier Code of Conduct – We are working to update relevant subsidiary-level Supplier Codes of Conduct and Supplier Agreements to conform with the BHI Supplier Code of Conduct with respect to a prohibition on Modern Slavery, forced labor, and human trafficking.

Independent Human Trafficking Risk Analysis – We are working with an independent human rights expert consultancy on a human rights impact assessment to examine where our business may be at risk of human trafficking and Modern Slavery issues.

Improving Sanctions Screening Process – We continue to improve our sanctions screening processes and technology.

APPROVAL

Approved and signed by a representative of the Board of Directors on April 20, 2023.

