

# 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, 2021.



## 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 employ over 20,000 employees across over 70 countries. Diversity and inclusion are embedded at the very core of our business and the risk of unlawful discrimination and non-inclusion is something we act strongly against.

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 due to the rise in organized criminal networks and global migration.

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

We believe our operations place us at a low risk of exposure to Modern Slavery and Human Trafficking issues within our own businesses. We do not act as a producer, manufacturer, or retailer of any physical goods.

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 travel services are provided by travel service providers located in many of the countries in which these services are purchased by our customers.

As a company that facilitates global travel, we may be linked to companies in sectors where elevated modern slavery risks have been identified, including 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, as is true for most businesses.

Our 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.



## 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 operate 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 are thoroughly investigated and if appropriate, remedial action will be taken. Annually, we publish an internal compliance report where colleagues can see aggregated data on reports the compliance team has received through the Helpline.

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.

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 sanctions screening and verification process.

We have been and remain committed to paying our employees a fair salary and benchmark salaries annually. We commissioned Mercer, one of the world's leading compensation consultants, to carry out an independent audit on gender pay within our organization. They concluded that we have no systematic pay bias.



## 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:

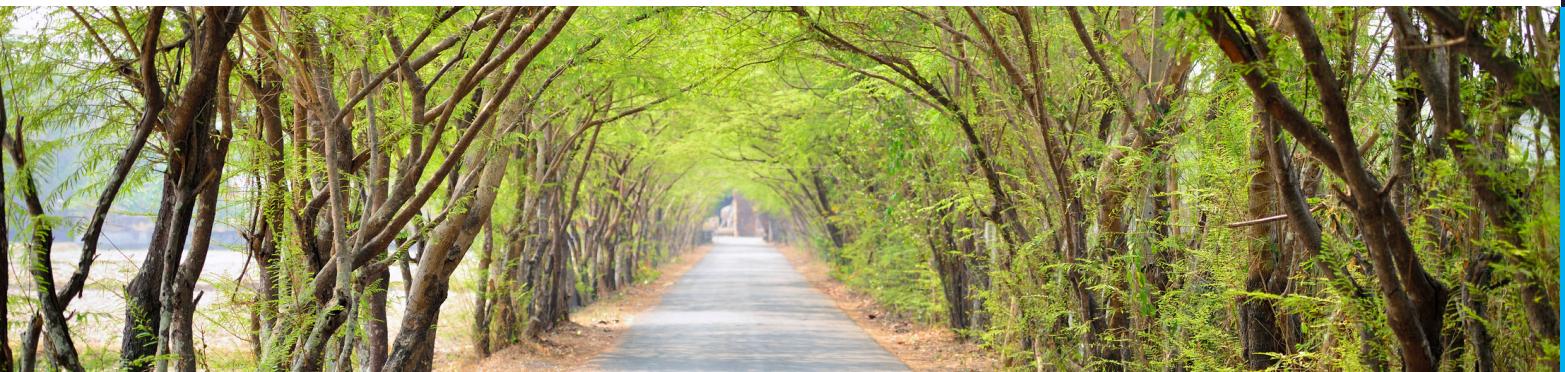
[Code of Conduct](#) – Alongside sustainability, human rights forms a central role of the Corporate Social Responsibility segment of our Code of Conduct. Our commitment to respect and promote human rights is based on internationally recognized standards and principles, including the United Nations Guiding Principles on Business and Human Rights. Employees can report perceived and actual breaches of the Guiding Principles to the Helpline as outlined below.

[Supplier Code of Conduct](#) – We expect suppliers to adhere to our Supplier Code of Conduct, which dictates that, among other things, suppliers should conduct their activities in a manner that respects human rights as set out in the United Nations Guiding Principles on Business and Human Rights, which includes a prohibition of forced labor. Certain suppliers have also been provided training on the Supplier Code of Conduct, which includes supply chain diligence.

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

[Contractual Clauses](#) – Our standard supply contracts include provisions obligating suppliers to comply with the UK Modern Slavery Act, 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 existing services will be terminated.

[Due Diligence and Sanctions Screening](#) – We have implemented a new and improved screening and verification process, which supports our business in detecting parties and organizations that are subject to sanctions, including those associated with modern slavery and human trafficking offenses. This screening process checks our customers, suppliers, partners, and affiliate partners. Should any parties fail the screening process, we have the ability to suspend and, if necessary, terminate our relationship with them.



## ACTIONS COMPLETED SO FAR (CONT.)

Helpline – We continue to promote the utilization of 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 thoroughly investigated, 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. Recently, we have developed a specific tutorial on how to use the Helpline in an effort to encourage its use.

Training – Booking.com Transport Limited (“BTL”) has developed a mandatory online training course dealing with Modern Slavery and Human Trafficking topics. BTL requires all employees to complete this training and we continuously review completion rates. In the event any BTL employee fails to complete the course within the set timeframe, there is an escalation process in place to address the course non-completion. The Modern Slavery and Human Trafficking course is mandatory for all new BTL employees. Other group brands currently have basic human rights training, in the context of our Code of Conduct, and are working to release their own Modern Slavery training.

HM Government’s Review of the Modern Slavery Act – In July 2018, the UK Home Secretary commissioned an Independent Review of the UK Modern Slavery Act 2015s (the “Review”). The Review considered the effectiveness of provisions in the Act and recommended improvements to it. The Government also published a response to the Review and accepted, in part, some of the recommendations made. We have considered both the Review and Response Documents to assess our compliance with the statutory requirements. It is noted that the Government undertook a public consultation, which ended on September 17, 2019, regarding transparency in supply chains. We welcome the conclusions from the Government Response published on September 22, 2020, and will incorporate the new requirements into our business practices. We will continue to monitor for any further developments in the review of the UK Modern Slavery Act 2015.



## FUTURE ACTIONS

[The UK Modern Slavery Registry](#) – On March 11, 2021, the UK government launched a Modern Slavery Statement Registry. We plan to submit our 2021 Modern Slavery Statement to the Government's Modern Slavery Registry for review, verification, and, subject to its acceptance, addition to the Registry.

[Independent Human Rights Review](#) - We intend to have an independent human rights review of our organization to examine where our business may be at risk of human rights issues.

[Human Rights Statement](#) - We are developing a company-wide human rights policy and program, which will set out our commitment to promoting human rights through travel, our expectations of our stakeholders to respect and promote human rights, our prioritization of salient human rights risks and opportunities, and our governance of these risks.

[Global Policy and Training](#) - We are developing a robust global Modern Slavery Policy, alongside up-to-date worldwide training for employees on how to spot and mitigate modern slavery in our supply chain. We plan to include that any breaches of the Modern Slavery Policy will result in disciplinary action, which could include dismissal for misconduct.

[Improving Sanctions Screening Process](#) - We continue to strive to have best-in-class sanctions screening processes and technology. Therefore, we plan to strengthen our already robust sanctions screening process to ensure that we have a high-quality supply chain due diligence program.

## APPROVAL

Approved and signed by the Board of Directors on April 21, 2022.

