



Code of Conduct and Ethics

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Message from the Administration

Despegar, the Board of Directors, its management and all members of the staff are committed to the highest standards of corporate governance.

Our Code of Conduct and Ethics represents the values, principles and rules that guide us in the development of our activities and business to achieve the challenges of our organization with the highest standards in ethics, and transparency, and in accordance with the law.

Considering all the above-mentioned commitments to act with integrity and honesty, the Board of Directors, as well as all other Despegar employees, follow the procedures and standards that are established in this Code of Conduct and Ethics.

Code of Conduct and Ethics

This Code of Conduct and Ethics (the "Code") sets forth principles and rules to promote and ensure integrity, honesty and ethical conduct in Despegar and its respective subsidiaries ("Despegar" or the "Company").

The Board of Directors, all managers, officers (Chiefs), VPs, Directors, Employees either permanent or temporary, working full or part-time and at any hierarchy level, and any other person that is part of the Company, understood for the purposes of this Code ("Employee" or "Employees"), must follow this Code , together with the Company's policies and standards.

In addition, all people or companies that represent Despegar or that provide goods or services, even temporarily, or maintain partnerships with the Company, as well as third-party agents, shall acknowledge and comply with this Code.

This Code should be read in conjunction with the Company's other policies that make up our Compliance and Integrity Program. Any non-compliance constitutes a violation of this Code and is subject to disciplinary sanctions.

All additional Company policies, codes and standards are available to Employees at "My Despegar" under the "Compliance" section located at <https://my.despegar.com/app/>, as well as on the external website (<https://investor.despegar.com/>) for other stakeholders.

Compliance with Laws, Rules and Regulations

Despegar seeks to conduct its business in accordance with the exact meaning and spirit of applicable laws, rules and regulations. Employees must comply with all the applicable laws and regulations.

None of our Employees shall engage in any illegal activity in the conduct of Despegar's business or in the performance of their daily activities in the Company, nor shall instruct any third party to do so. Despegar is committed to complying with the applicable economic, financial and trade sanctions laws, embargoes and restricted measures according to the applicable laws. As a global travel services business with customers world-wide, it is critical that Despegar and its Employees conduct business in compliance with all applicable laws.

Sustainability – Valuing Environmental, Social and Governance Aspects

For Despegar, sustainability is a core business strategy that creates long-term value.

We seek to connect the business to aspects of Environmental, Social and Corporate Governance (ESG), promoting a more resilient environment aligned with the best practices in the market.

Despegar has established a comprehensive ESG commitment that covers a wide range of areas, including environmental sustainability, social responsibility, corporate governance, and ethics.

Despegar supports and encourages volunteering, among other social practices, thus building partnerships with the objective of promoting the sustainable development of society in a way that does not compromise the ability of future generations to meet their own needs, within the limits of local laws and in accordance with this Code.

Despegar and its Employees are prohibited from entering into partnerships and/or contributions (sponsorships, donations, among others) to any third party due to personal relationships or those who are not in compliance with the legislation and this Code. Social investment actions should not be carried out with the sole objective of making business viable, much less conditioning social investment to the purchase of Despegar's products or services by the benefited organizations. No form of degrading work (child, forced, involving physical or psychological abuse, among others) is tolerated; hazardous working conditions; or conduct that may collaborate with an informal economy are not tolerated either.

Harassment or discrimination of any kind – based on color, race, ethnicity, age, gender, affective-sexual orientation, disability, language, religion, political opinion, national or social origin, economic position, birth or any other condition – is not accepted, neither in the work environment nor during recruitment, selection, training, promotion or transfer of Employees. Any kind of harassment or discrimination must be curbed and reported.

Equal Opportunity Employer

At Despegar, we value and celebrate diversity, because each person is unique and individually makes up our strength and our brands. Our internal processes are designed to promote and ensure equal opportunities without distinction as to any characteristic, history or identity of individuals.

Despegar is committed to inclusive hiring, workplace inclusion and unconditional respect for all individuals, without any restrictions based on race, gender, ethnicity, nationality, religion, age, sexual orientation, political affiliation, people with disabilities, people who have or have had any disease (hereditary or not, chronic or not), people in refugee situations, among others. Our concerns and commitments revolve around curbing discrimination in any of its forms.

Despegar's Employees must be treated with respect and dignity, and the Policies and practices must be administered in a manner that ensures that equal opportunity is provided to Employees in all matters and that all decisions are made based solely on merit.

Health and Safety in the Workplace

Despegar provides a healthy, reliable and safe work environment for its Employees, free from known health and safety risks. Each Employee is responsible for using Despegar's equipment and materials safely and responsibly. Together, we need to take responsibility for reporting unsafe practices and conditions and other potentially preventable situations in the workplace and notify immediately in the event of accidents.

Acts or threats of violence – whether direct or indirect, or through words, gestures or symbols – directed by an Employee towards another person, or at that person's family or property, are unacceptable.

Derogatory actions, words, jokes or comments based on gender, race, ethnicity, nationality, sexual orientation, age, religion, political affiliation, people with disabilities, people who have or have had any disease (hereditary or not, chronic or not), people in refugee situations, or other illicit behavior in the workplace will not be tolerated at Despegar, are committed by a colleague, superior, customer, contractor, supplier or any other person. Therefore, it is everyone's duty to reject and immediately stop, whenever possible, any type of behavior that is not appropriate or any degrading treatment, abuse, moral, psychological, sexual harassment, physical or verbal aggression and any other act that may characterize disrespect, prejudice or discrimination against someone or a certain group of people. Any situation of disrespect and harassment must be reported.

We must always remember that it is prohibited:

- Consuming or being under the effect of any intoxicating substances during working hours, as well as smoking on Despegar's premises.
- Adopting behavior or procedure that may pose a risk to their own health or to the health of other professionals, including physical and psychological integrity.
- Maintaining behavior that is incompatible with socially accepted standards, that compromises the work environment or that may harm Despegar's image.
- Soliciting personal favors or services from those over whom we exercise, control, or oversight.
- Practice or connive with any act that represents unlawful conduct or that may constitute a violation of this Code.

Protection and Proper Use of Despegar's Assets

All Employees must protect Despegar's assets and ensure their efficient and proper use. The Company's assets include resources such as office supplies, equipment (laptops, mobile phones, etc.), communication systems, and vehicles, as well as proprietary information, financial resources, and the Company's files, records, and documents. Theft, misplacement, negligence and/or waste have a direct impact on Despegar's business.

Access to the internet and telephone, as well as the use of e-mails, software, hardware, equipment and other assets of Despegar must be directed to the exercise of professional activity and follow the Company's regulations on the subject. Corporate e-mail and any assets (equipment owned by Despegar) may be monitored to ensure that these resources are used appropriately and in accordance with applicable regulations. E-mail, internet, telephones and other forms of

communication should be used in a professional manner, using appropriate, respectful language and without the use of defamatory words.

We must respect the copyright and intellectual property of others. As such, we do not permit the use or sharing of unauthorized or illegally obtained copies of third-party materials, systems, and software. We can only install, use or allow the use of computer programs (software) licensed to Despegar and duly validated by the Information Technology department.

All Despegar's assets must be used in connection with the Company's business purposes. Proprietary information includes intellectual property such as software code, trade secrets, patents, trademarks and copyrights, as well as business plans, marketing and services, engineering and manufacturing ideas, designs, know-how, databases, records, salary information and any unpublished financial data and report.

Social Media

Employees should exercise good judgment when posting comments related to the Company anywhere on the Internet, including blogs, social media and social networking sites such as but not limited to Meta, YouTube, Twitter, TikTok and LinkedIn. In general, you must not blog or publish about Company matters without the Company's permission. If you get permission, comments must be aligned with this Code and must be in good taste and not include illegal, vulgar, degrading, or embarrassing content. Publications must not reveal proprietary or confidential information, such as the Company's performance, business plans, pricing, etc. You should be particularly mindful when engaging in online conversations that reference the Company or are posted using Company equipment or through the Company's network. Under no circumstances any Employee manifestation should be against any of the terms of this Code.

Personal social media accounts should be used in a responsible manner. When you publish information or an opinion on your own behalf, do not use your status as a member of the Company nor have any other reference that may attribute the published content to Despegar.

We count on everyone's collaboration so that something that can be interpreted as follows is not published:

- Discriminatory opinion.
- Hate speech that incites hostility or violence against a person or group because of race, ethnicity, age, gender, sexual orientation, disability, language, religion, political opinion, national or social origin, economic position, birth or any other personal characteristic.
- Crime against the honor of people or companies.
- Advertising for the sale of goods and/or services that may, in any way, compete with and/or damage the Company's image.
- Advocacy for crimes.
- Investment suggestions.

Competition

Despegar conducts its business and activities freely and fairly, without unfair dealings or attempts to harm our competitors or free competition. Competition is essential so that the ecosystem (competition and consumers) can exercise its freedom of choice.

We must combat three types of practices:

- Unfair competition (obtaining a competitive advantage using unethical or illegal means).
- The formation of cartels that could harm the consumers.
- Unilateral practices that undermine the competitive dynamics in the market in which we participate.

For this reason, Despegar requires its Employees to:

- Act in accordance with the principles of free competition and respect the reputations and opinions of our competitors.
- Participate in business associations with a spirit of cooperation, aiming exclusively at the improvement of the sectors of the economy in which we operate, being certain that participation must be previously communicated in line with the Internal Committee for Conduct and Ethics.
- Respect intellectual property and not use confidential information of competitors without their express authorization.
- Any approach involving competitors must be previously evaluated by the Internal Conduct and Ethics Committee.
- Not to promote and practice any act of economic espionage or to obtain plans and actions from competitors by dubious or illegal methods.
- Not to make comments that may affect the image or contribute to the spread of rumors about our competitors.
- Not to discuss with our competitors' sensitive issues that constitute our differentials, such as business strategies, competitive advantages, pricing and discount policies, contract terms, costs, market research, marketing strategies, accounting and management results, development of new products, services and technologies.
- Not to practice, in any way, price adjustment, production or distribution of products or services, as well as division of customers or areas of activity.

All Employees must negotiate fairly with Despegar's customers, suppliers, competitors and Employees. No one shall take unfair advantage of any person through manipulation, concealment, insider trading, misrepresentation of material facts, or any other unfair trading practice.

Any questions that an Employee has in the conduct of his/her activities that potentially involves a competitor, he/she should always seek the Internal Conduct and Ethics Committee for advice and guidance.

Conflicts of Interest

Despegar's Employees have the responsibility of always acting in the best interest of the Company. This responsibility includes avoiding real and perceived conflicts of interest, which arise whenever personal, social or financial interests interfere, or even appear to interfere, with the interests of the Company.

Therefore, we should avoid performing any act, participating in proceedings or making decisions when our independence and impartiality on the subject may be compromised. Thus, we must refrain from participating in situations in which we have influence or interest in the outcome and in acts, processes and decisions that may result in benefit for the Company or for a person with whom we have a kinship, sentimental or professional relationship. It is a violation of the Code to have a business relationship, as a representative of the Company, with a company in which there is an economic interest or participation, directly or indirectly, without authorization from the Internal Conduct and Ethics Committee.

Furthermore, the participation – direct or indirect – of Employees in activities or companies external to Despegar is not prohibited. However, any ties maintained by Employees with other companies, activities or individuals may lead to favoritism, which may have negative repercussions. Therefore, Employees must expressly communicate in writing to the Internal

Conduct and Ethics Committee with their intention to assume activities in other organizations or to establish or join other companies. In addition, they must request guidance from the Internal Conduct and Ethics Committee before conducting private business or forming a partnership with professionals, companies and managers of companies that are customers, suppliers or business partners of Despegar, as well as before hiring or maintaining relationships with suppliers, service providers or business partners who have a relationship with managers or employees (e.g.: kinship, participation in society, etc.) in order to assess a potential conflict of interest.

Managers and the Internal Conduct and Ethics Committee must be formally notified of situations that may constitute a conflict of interest. If you know of someone who may be in a situation of conflict of interest and who has not expressed themselves in this way, you should do so. Silence about a possible conflict of interest also constitutes a violation of this Code.

Privacy and Confidentiality

At Despegar we understand that information is one of the main assets of the development of our activity. We must maintain confidentiality with all that information that we access because of the performance of our activity.

Despegar follows applicable data security and privacy laws and its own data security and privacy policies when processing (collection, storage, use, retention, transfer and deletion), and handling customer personal information, as well as personal information about Employees and third parties.

Each Despegar Employee must be diligent in the use of information and cyber security mechanisms. Employees must also, always, maintain the privacy, security and confidentiality of all personal and confidential information entrusted to them, except when disclosure is authorized or legally required. It is imperative that all Employees keep confidential all information about Despegar's operations and business activities that has not become public or that is not common knowledge among investors, competitors, customers, suppliers, and others, such as other Employees who do not have a valid business reason to obtain the information. In this sense, Employees must maintain the strictest confidentiality, not disclose, copy or use, for themselves or for third parties, for any reason, at any time, the personal data or technical, commercial and industrial information owned by Despegar or third parties, to which they may have access, voluntarily or involuntarily, due to the employment or service relationship with the company. This non-disclosure obligation applies to Employees not only during their period of employment or service, but also after the termination of contract or service, or upon retirement.

It is of paramount importance that express and unequivocal authorization from the Internal Conduct and Ethics Committee be requested before using non-public information or know-how in external activities or publications, such as: classes, conferences, lectures, academic papers, books, magazines and social media (social networks, sharing of videos or photos, blogs, etc.), since their disclosure or tampering may eventually cause financial losses, favor competition or generate negative impacts on Despegar's business or image.

It is a violation of the Code to use confidential information obtained due to a function or professional activity, for one's own benefit or that of third parties. Therefore, before disclosing information that is not available to the public for any purpose, please consult the Internal Conduct and Ethics Committee.

Use of Insider Information

If you have information that may affect the trading value of the company's negotiable securities or the course of their negotiation, you must keep such information confidential, not being able to disclose it directly or indirectly.

Buying or selling securities while aware of material, nonpublic information, or communicating that information to any other person for such use is illegal and may give rise to legal actions. Therefore, you must comply with the policies and periods of refraining from carrying out transactions that could be applicable based on the circumstances that the company is going through.

Information is "nonpublic" if it has not been publicly disclosed, and information is "material" if there is a substantial likelihood that a reasonable investor would consider it important to decide to buy, sell or hold a security, or in cases where it is likely to have a material effect on the market price of that security. Both positive and negative information can be material. In addition, it should be emphasized that material information does not have to relate to a company's business; information about the content of a future publication in the financial press that may affect the market price of a security could, for example, be material. In case of doubt, the information should be presumed to be material and not public.

Accordingly, all our Employees are prohibited from:

- Buy or sell the Company's securities at any time while they are aware of the material, non-public information.
- Buy or sell securities of any other company at any time when in possession of material, non-public information obtained because of the employment or relationship of the Company's director, officer or Employee.
- Disclose material, non-public information to any other person, including spouses, relatives, friends, household members or business associates, who then trades in securities or passes on the information or initiates rumors relating to the material, non-public information.
- Engage in short-term investment activities or "same day buying and selling of securities" of the Company's securities.
- Engage in "short selling" of the Company's securities (i.e., selling the Company's securities that such person does not own and borrowing those securities to make delivery).
- Buy or sell similar companies put options, call options, options or derivative securities, including for hedging purposes.

These rules apply to all Employees, as well as their immediate family members, regardless of their location. Immediate family members include spouses, parents, children, siblings, mothers-in-law, fathers-in-law, sons-in-law and daughters-in-law, brothers-in-law and sisters-in-law, and anyone (except for tenants and household associates) who share that person's home. Employees must comply with these rules and must make sure that their immediate family members also comply with them.

Relationship with the Press and External Media

All relations with the press and with any external communication vehicle must be made through an official statement, that is, by the respective spokespersons of Despegar. Any invitation from the press to speak or write about topics and facts involving Despegar and/or disclosing

corporate information must be authorized by the Institutional Relations Department or by the Internal Conduct and Ethics Committee.

The participation of employees as speakers in congresses, seminars or external events must also be preceded by authorization from these departments.

Public Sector Relations – Policy and Government

Despegar's relationship with public officials is guided by transparency, ethics and compliance with applicable laws. Only authorized and properly prepared and trained employees, as spokespersons for the Company, may carry out any activity on behalf of Despegar with public officials, and any offers or promises of gifts, gifts, trips, entertainment, jobs and donations to public officials or political parties are prohibited, under the terms of the Policy for Preventing and Combating Corruption and Fraud.

Interacting with Third Parties

The third parties with whom we interact (customers, vendors, suppliers, contractors, subcontractors, consultants, business partners, among others) can create responsibility or joint responsibility for our company; therefore, it is essential to know them. It is important to understand the reputation, background, compliance conditions, and business practices of these third parties before entering into a contract and before providing any services. When we hire, we must evaluate the integrity of the third parties with whom we interact.

When doing business with our company, third parties must comply with our Code of Conduct and Ethics and its associated policies.

Preventing and Combating Corruption (Bribery)

There is zero tolerance for any form of bribery or corruption. No Employee or third party with ties to Despegar may provide, offer, promise, or authorize anything of value to any person or party for the purpose of obtaining or retaining business, gaining influence, favorable treatment, or any other type of improper advantage for the Company. Note that “anything of value” (as described further below), is not limited to payments of cash or cash-equivalents and may include, among other things, services or favors. Despegar is also not allowed to make payments to expedite procedures of any kind (sometimes referred to as “facilitation payments”).

Bribery can take many forms and may involve the provision or offer of any financial or non-financial item that is of value to the recipient, including, for example, gifts, meals, entertainment, travel, cash or cash equivalents, favors, services, loans, employment, etc. This applies to both direct and indirect conduct. It is therefore forbidden to give or receive anything of value through an intermediary in exchange for improper commercial benefit.

Despegar and its Employees are subject to legislation that prevents and combat corruption, which prohibits bribery of government officials (directly or through third parties) and punishes companies and individuals. Therefore, any relationship with public officials or government entities requires extreme caution; it is required that they are reasonable and directly related to a legitimate business purpose. And in any case, it cannot be intended to influence the decisions of the public official.

It is forbidden to engage in this behavior, either directly or indirectly. These prohibitions apply to items of value given to or received from any person or entity, including government agencies,

government officials, any person from an international organization or non-governmental organization, any political party official or candidate, parties to commercial businesses, individuals, or relatives of any of these.

At Despegar we have the responsibility and obligation to comply with our anti-corruption standards, the different laws and regulations on the matter, as well as the obligation to reject and report any act of corruption. Accordingly, it is imperative that all Employees follow Despegar's policies, procedures, and controls relating to anti-corruption, bribery, and internal transaction recordkeeping and reporting.

More specific information can be found in Despegar's Policy for Preventing and Combating Corruption and Fraud and in the Gift and Invitation Management Policy. Employees can also contact the Compliance Department with any questions regarding these policies or Employee's obligations under applicable anti-corruption laws.

Prevention and Combating of Money Laundering

Despegar does not accept, in the development of our professional activities, any practice that aims at or results in the concealment or concealment of the origin, location, disposition, movement or ownership of goods, rights or values deriving, directly or indirectly, from criminal offenses.

In addition, the Company always seeks to adopt the best practices to comply with the Anti-Money Laundering and Combating the Financing of Terrorism standards issued by regulators.

In this sense, any suspected money laundering operation and/or Financing of Terrorism must be reported through the Company available reporting channels.

Benefits & Gifts

Giving and receiving business gifts, entertainment, meals, or travel (including flights and hotel stays) can be a usual way to strengthen business relationships. However, such behavior must never compromise the integrity of the Company's services and business relationships.

If we decide to make or receive corporate or business gifts, these should be reasonable, appropriate, and related to legitimate business purposes, should not be frequent, should be properly approved and must not exceed the amount established in our Policy on Gift and Invitation Management Policy. However, gifts, gifts and/or hospitality should not be accepted or given, even with a smaller amount, when it could affect objectivity or influence a business relationship, a professional or administrative decision.

In all cases, gifts in cash or equivalents (e.g. certificates, discount vouchers or shopping cards) are strictly prohibited, gifts should not be received or given to governmental parties or officials, and they should never have the intent to influence or provide a commercial advantage.

Invitations received to participate in trips, business events, conventions, conferences, commercial presentations or technical courses must be authorized by the Internal Conduct and Ethics Committee.

More specific rules can be found in Despegar's *Prevention and Combating Corruption and Fraud Policy* and the *Gift and Invitation Management Policy*.

Financial Reporting, Disclosure and Internal Controls

It is Despegar's policy to maintain accurate books and records and to promote the complete, fair, accurate, and timely records and reporting of financial information. Each transaction performed by Despegar must have the appropriate internal authorization and approval and be carried out in accordance with the current laws.

All expenses, including gifts, meals, entertainment, and travel expenses, must be accurately reported and recorded, and all accounting records, expense reports, invoices, vouchers, and other business records must be accurately completed and properly maintained in reasonable detail. False or misleading entries and undisclosed or unrecorded payments or accounts are strictly prohibited, as well as any acts intended to or that may violate or impact Despegar's internal accounting controls.

Despegar is committed to full, fair, accurate, timely and understandable disclosure of the reports and documents it files or submits. In this regard, all Employees are responsible for following the Company's disclosure procedures and controls, and all the internal controls over financial reporting.

Reporting Suspicious Non-Compliance Acts or Events

All Employees must report actual or suspected acts or events which are non-compliant with the Code through the available reporting channels described in the *Global Whistleblower Policy*, which describes the reporting procedures in detail. Not doing so is considered a violation to this Code, as Employees are required to promptly report any suspected violations of the law, regulations, or to any Despegar policy. Unless you would like to identify yourself, all reports are anonymous and are treated as such at all times.

The Internal Conduct and Ethics Committee, which is comprised of representatives from the Compliance Department, Legal Department and Human Resources Department, will treat all reports of violations (or suspected violations), complaints or questions confidentially and Despegar will respect and will take steps to protect the anonymous nature and the confidentiality of the submission, subject to applicable laws, regulations or legal procedures.

The Company will not retaliate or take any action, and does not tolerate anyone else doing so, against anyone who reports (or threatens to report) a violation of the rules and regulations, a non-compliance act or event, or who cooperates with investigations, provided that the reporter has acted in good faith with a reasonable belief that the information provided was true.

All Employees must cooperate with internal and external investigations. This means providing truthful information and relevant documents and/or records. Contributors should not discuss government or internal investigations with any other employee or any third party, including the media, family, or friends.

Complaints can be submitted through different channels as follows:

- **In Person**
- **Web**
- **Phone**
- **E-mail**

The information about the toll-free number, the complaints web links and the complaints email address are available to Employees at “*My Despegar*” under the “Compliance” section located at <https://my.despegar.com/app/>.

If you are an external party to Despegar you can find this information on the external website (<https://investor.despegar.com/>).

Compliance Procedures

All Employees will be asked to confirm, in writing, that they have read, understood and will comply with the Code, as a requirement to start/continue their service at Despegar. A copy of this Code is also available to all Contributors by accessing Despegar's web page.

Despegar's management shall take reasonable steps from time to time to supervise the compliance with the Code of Conduct and Ethics and its related policies.

Consequences of Code Violations

The Company may apply disciplinary sanctions in case of breach of this Code of Conduct and Ethics, associated policies and/or the law. These sanctions may even mean the termination of employment or contractual relationship and give rise to the promotion of legal actions that may correspond. Likewise, to whom bad faith makes false reports or complaints and/or lies or obstructs a related investigation, these sanctions may be applied.

Considering the Company's commitment to always act in cooperation with national or foreign public authorities, if the infraction committed represents a civil, administrative or criminal offense, it may be taken to the regulatory bodies and the competent public authorities.

Policies & Standards | Support

This Code should be read in conjunction with other Company policies that accompany, support and complement this document providing more specific rules.

Employees may access all these compliance policies through the “Compliance” folder in “*My Despegar*” located at <https://my.despegar.com/app/>, and should contact the Compliance Department with any questions for further guidance in these areas.