



## **POLITICAL PARTICIPATION POLICY**

### **Introduction**

Expedia Group, Inc. (“**Expedia Group**” or the “**Company**”) participates in the political process across local, state, and federal governments by informing government officials about our positions on issues significant to the Company and its shareholders, employees, partners, and customers. These issues are discussed in the context of existing and proposed laws, legislation, regulations, and policy initiatives, and any such participation must comply with all applicable legal restrictions and shall be subject to the public disclosure processes outlined in this policy.

Relatedly, the Company constructively and responsibly participates in the U.S. political process. The goal of the Company’s political contributions and expenditures is to promote the interests of the Company and our customers, and the Company makes such decisions in accordance with the processes described in this political contribution and expenditure policy and statement, without regard to the personal political preferences of the Company’s directors, officers, or employees.

### **Political Contributions**

In states where it is permitted, Expedia Group makes corporate contributions to support state and local election campaigns, state party committees, state ballot measures, and other tax-exempt organizations where the money may be used for political purposes. Expedia Group operates in accordance with all relevant laws, including disclosing such contributions to the appropriate State regulatory agency, such as the secretary of state or city board of elections.

Expedia Group does not use corporate funds to donate to 501(c)(4)s aside from sponsorships for events conducted by social welfare organizations, and it does not make any independent expenditures on behalf of or in opposition to political candidates.

When Expedia Group makes political contributions, it bases its contribution decisions on the best interests of the Company and sound public policy regardless of the personal views of the Board and management. The Company’s Vice President of Corporate and Government Affairs reviews and approves each political contribution and expenditure made with Company funds or resources in support of any political candidate, political campaign, political party, or political committee, to ensure that it is lawful and consistent with the Company’s business objectives and

*Expedia Group, Inc. Political Participation Policy, approved by the Board of Directors, March 12, 2020, as amended May 28, 2021.*

public policy priorities. The Company considers the following factors when considering a contribution:

- The candidate's leadership position;
- The candidate's past voting record;
- Whether the candidate sits on a Committee that affects its business
- Whether the candidate represents a State or locality where Expedia Group currently conducts business.

In addition, Expedia Group employees are active in their communities and may participate in the political process. To the extent an Expedia Group employee is active in the political process, it must be a personal decision undertaken on the employee's personal time. The employee may not use any corporate resources and will not be reimbursed for any personal political contributions. In addition, giving money, gifts, products or services to government officials in exchange for official action is strictly prohibited.

### **Board Oversight**

The Executive Committee of the Board of Directors annually reviews this political contribution and expenditure policy, and a report on all of the Company's political contributions and expenditures. Additionally, management provides the Executive Committee with a review of the overall strategic priorities for political contributions, industry association affiliations, and policy statements, including the objectives that align with the long-term business objectives of the Company. Any Political Contributions by the Company made in the United States to a single candidate, political party or ballot initiative, or any membership fees or contributions to an Industry Association, that aggregate to more than U.S. \$100,000 in a calendar year is reported to the Executive Committee.

## **Lobbying Activity**

The Company may from time to time directly engage external registered lobbyists to assist the Company in monitoring governmental policy development, advising the Company, or communicating the Company's positions on various political issues that concern the long-term business interests of the Company. Only Government Affairs or the Legal Department may engage external registered lobbyists or firms who advise on governmental affairs issues, with the approval of the Vice President for Government & Corporate Affairs. The Company will make all required public disclosures regarding lobbying activity.

## **Trade Associations**

The Company contributes to a variety of industry trade associations, and other tax-exempt organizations where money may be used for political purposes. Many of these groups engage in efforts to advocate for policies that benefit the Company in collaboration with our industry partners. These organizations allow Expedia Group to speak with a unified voice on industry issues and reach government officials more efficiently and effectively. The total amount paid by the Company to U.S.-based trade associations, coalitions, and social welfare organizations in 2020 was approximately \$880,000.