Expedia Group Human Rights Statement
Effective as of September 8, 2023

At Expedia Group, we believe that travel is a force for good. Our business seeks to deliver the best possible travel experiences to people all around the world through our best-in-class technology. With this in mind, we strive to create a marketplace that not only reflects the global communities we serve but that also fosters a more open, accessible, and sustainable world. Respect for human rights remains essential to our mission and underpins our values.

This Human Rights Statement formalizes Expedia Group’s long-standing commitment to uphold and respect human rights for all people, including our travelers, employees, business partners, and the individuals and communities we engage with.

Our Commitment to Human Rights

We believe that the travel and business opportunities enabled by Expedia Group support the realization of important human rights, such as access to culture, desirable work, and freedom of movement. However, we recognize that travel may also be connected with human rights risks, such as human trafficking, discrimination, and adverse impacts on local communities.

Expedia Group is committed to respecting all internationally recognized human rights enumerated in the Universal Declaration of Human Rights (UDHR), the International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social and Cultural Rights (ICESCR), and the International Labour Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. In the potential instance of conflict between local laws and international human rights standards, Expedia Group commits to adhering to the highest standard of human rights protections to the greatest extent possible.

Recognizing that certain vulnerable groups may face heightened risks to their human rights, which may be amplified by the global impact of travel, we also commit to respecting the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), the Convention on the Elimination of All Forms of Racial Discrimination (CERD), the Convention on the Rights of the Child (CRC) and the Convention on the Rights of Persons with Disabilities (CRPD).
Statement Scope

This statement applies to all Expedia Group brands and employees, as well as all Expedia Group third-parties such as business partners, suppliers, vendors, contractors, and travelers.

Our Approach

In an effort to effectively integrate human rights considerations across all facets of our work, Expedia Group is constantly striving to further embed human rights across the company. This approach is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs).

In line with the UNGPs, Expedia Group commissioned a human rights salience assessment, led by BSR (Business for Social Responsibility), as part of our due diligence process to identify and assess our impacts on human rights, outline opportunities to integrate and take action on the findings, track and measure our progress, and externally communicate how impacts are addressed.

Notably, our salience assessment included engagement with third-party issue experts and potentially impacted rightsholders (or those with insights into their concerns), which informed our understanding of human rights risks, and approaches to address them. Where possible, we prioritize engagement with groups and individuals whose rights are directly impacted by our business operations, product, platforms, and services, and share findings with relevant stakeholders. We also participate in collaborative initiatives, to explore best practices and discuss and share learnings with peer companies striving to respect human rights.

Expedia Group is firmly committed to adhering to the laws, regulations or decisions that apply to our businesses and respect internationally recognized human rights wherever we operate, including those of the UN Security Council, USA, EU, Canada, and the UK in relation to sanctions, whether they apply to countries, entities, or individuals.

Expedia Group seeks ways to honor the principles of internationally recognized human rights when faced with conflicting requirements. This may occur in conflict-affected areas or jurisdictions where local/international law and international human rights standards are in tension. In these cases, we are committed to providing transparency to our travelers so that they have the information necessary to make the travel decisions that best suit their needs.

Expedia Group endeavors to maintain business relationships with travel suppliers and third-party vendors that are committed to respecting human rights and workplace rights. We expect our supply chain to adhere to our Vendor Code of Conduct, which is
referred to in our core agreements and sets out our foundational expectations in relation to all supplier and third-party vendor behavior and activity. We will not knowingly work with third-parties who engage in these practices. The Vendor Code of Conduct is inclusive of all the human rights mentioned herein, and non-compliance can lead to Expedia Group terminating an agreement with a vendor or supplier.

Expedia Group is committed to continual improvement on our human rights impacts. We report on our progress toward human rights on an annual basis as part of our Global Impact Report, which details our progress on key areas of corporate responsibility, and through our Modern Slavery Statement. We are committed to transparency to our stakeholders, including sharing information that will allow our travelers and partners to make decisions in line with a human rights-based approach.

As part of our Whistleblower Policy, Expedia Group maintains a twenty-four-hour phone helpline and online reporting tool (EthicsPoint; managed by an independent third party, Navex Global) as an accessible grievance mechanism, in line with the UNGPs, available to Expedia Group employees and third-parties to confidentially report any concerns, without fear of retaliation. Reports submitted via EthicsPoint are then investigated in accordance with company policies and procedures.

Priority Areas

Based on engagements with issue experts and rightsholders, Expedia Group commits to building upon and expanding its capabilities across following five focus areas:

- **Combat Discrimination and Promote Inclusion:** We are committed to providing equal employment opportunities in a cooperative and productive work environment free from unlawful discrimination and harassment and creating an inclusive environment both online on our platform as well as offline which is detailed in the Expedia Group Employee Code of Conduct (known as the ‘Boarding Pass’), the Equal Employment Opportunity Policy, Community Standards and Guidelines, Code of Business Conduct and Ethics For Directors and Senior Financial Officers (“the Code”), and Vendor Code of Conduct. Our Open World™ social impact and sustainability strategy sets out Expedia Group’s commitment towards addressing issues of inequity within the travel ecosystem through the development of programming and partnerships with organizations supporting increasing access and improving conditions for underserved travelers, empowering underrepresented entrepreneurs, educating our travel partners on issues of accessibility and inclusion, and improving our own platform experience.

- **Caring for our Communities:** We are committed to alleviating the adverse impact travel and tourism can sometimes have on local communities and destinations and promoting the positive benefits the industry can bring as a driver of community economic and social development, creating employment opportunities and supporting local livelihoods. We support opportunities for shared prosperity and
democratizing access to the travel economy so that more people can benefit from the industry’s growth, locally, through partnerships focused on local businesses, entrepreneurs, and workforce development opportunities. In addition, we seek partnerships in local destinations that prioritize equity, ensuring equality and fairness in funding opportunities for historically marginalized communities and addressing the frequent power imbalance between funders, grantees, and local stakeholders to form meaningful partnerships with local organizations in our communities. In addition, we are committed to disaster giving that centers equity and supports local partners by delivering ongoing supporting to destination communities impacted by natural disasters and humanitarian crises, prioritizing medium- and long-term recovery through our partnership with the Center for Disaster Philanthropy and supporting destinations with media campaigns that support their recovery.

- **Safeguard Privacy:** We are committed to safeguarding the privacy, confidentiality, and security of personal information entrusted to us, in line with our company Privacy Policy, Privacy and Data Handling Requirements, and Privacy Statements posted within each of our Expedia Group company sites and Partner Central, and expect our vendors and other business partners to do the same. Expedia Group’s data collection efforts reflect international standards and are guided by principles of transparency, purpose limitation, proportionality, and fairness. Our Privacy Principles emphasize responsible use, putting customers in control of their own data, prioritizing transparency on data use and data sharing, implementing strong security mechanisms, which includes accountable governance and oversight. Additionally, these Principles ensure the consideration of ethical issues that may arise from integration and use of emerging technologies across our products and platforms, such as artificial intelligence. In instances where vendors may have access to Expedia Group, sensitive, personal, or public data, we conduct a rigorous security assessment of the vendor’s physical and environmental controls, data security, information lifecycle, access controls, personnel, operations, network communication, incident response, and business continuity.

- **Prevent, Avoid, and Mitigate Human Trafficking:** We are committed to conducting our business in a manner that protects human rights, and prohibits and opposes all forms of modern slavery, servitude, forced labor and human trafficking as detailed in our Modern Slavery Statement and Vendor Code of Conduct. Our Modern Slavery Statement outlines the ways Expedia Group seeks to utilize our systems to assist our travel suppliers and partners in identifying potential instances of human trafficking and enhance their own monitoring. We participate in the Blue Lightning Initiative under the US Department of Homeland Security and the US Department of Transportation by which we work with those Departments and the US Department of Justice, and Federal Bureau of Investigation on criminal cases to detect when persons of interest to those government agencies access our platform to facilitate movement of a person or persons for nefarious purposes. We also expect our supply chain to adhere to our Vendor Code of Conduct which sets our foundational expectations for all suppliers, vendors, and any subcontracted parties that support an Expedia Group agreement to combat modern slavery, discrimination, and
exploitation or their own policies which are no less restrictive. Expedia Group is also a founding member of the anti-trafficking task force within the World Tourism Trade Council and partner with a range of organizations to develop and accelerate the growth of strong online tools to combat trafficking.

- **Champion Environmental Sustainability:** Climate change threatens the effective realization of a range of human rights goals, and given its link to the travel industry, is an important focus for Expedia Group. Powering global travel for generations to come will require preserving vulnerable ecosystems, protecting local communities and cultures, and transitioning the industry to Net Zero emissions. We are committed to preserving and enhancing the geographical character, including the natural environment and associated well-being of local residents, of travel destinations around the world through our partnership with the Travel Foundation, and to ensuring our travelers are able to make more sustainable choices. Expedia Group is a signatory to the Glasgow Declaration on Climate Action in Tourism and a member of the Travalyst Coalition. We are working to lower emissions and reduce energy, water, and waste in our own operations, as well as to influence and enable similar shifts by our vendors. We are supporting research into the topic of climate justice within travel and tourism and convening our partners and peers around the issue to expand action and awareness. Expedia Group requires our vendors to maintain all necessary environmental permits and registrations, comply with reporting requirements, and monitor and control waste generation and air emissions.

**Governance**

This Statement was approved by the Executive Committee of the Board of Directors of Expedia Group, Inc., and prepared under the review and approval of Robert Dzielak, Chief Legal Officer and Michael Davis Velasco, Chief People, Inclusion and Diversity Officer at Expedia Group.

Updates on Expedia Group’s progress on human rights commitments and significant human rights issues will be provided as part of our annual Global Impact reporting.
Statement Review and Supporting Documents

Expedia Group will periodically review and update this statement and our corresponding approach, to address changes in our priority focus areas, based on the evolving context of our work, product and service offerings, and the travel industry more broadly and stakeholder feedback.

This Human Rights Statement is supported by other Expedia Group documents, including the following:

- [Employee Code of Conduct (The Boarding Pass)]
- [Code of Business Conduct and Ethics for Directors and Senior Financial Officers]
- [Vendor Code of Conduct]
- [Modern Slavery Statement]
- [Equal Employment Opportunity Policy]
- [Community Standards]
- [Community Guidelines]
- [Expedia Group Privacy Policy]
- [Expedia Group Partner Central Privacy Statement]
- [Partner Privacy and Data Handling Requirements]
- [Vendor Privacy and Data Handling Requirements]
- [Data Subject Rights]
- [Political Participation Policy]
- [Board Commitment on CEO Candidate Diversity]