

# EXPEDIA GROUP, INC. MODERN SLAVERY STATEMENT

## INTRODUCTION

This Statement is made pursuant to both section 54(1) of the *Modern Slavery Act 2015* in the United Kingdom and section 16 of the *Modern Slavery Act 2018(Cth)* in Australia and constitutes Expedia Group's slavery and human trafficking statement for the financial year ending 31 December 2022.

*This Statement relates to Expedia Group, Inc. and its subsidiaries including:*

- *the following companies operating Expedia Group websites in the UK (including those websites further listed): Expedia, Inc (US), Hotels.com, LP (US), EG Vacation Rentals Ireland Limited (UK), Trivago NV (Netherlands). Non-exhaustive list of UK websites: [www.expedia.co.uk](http://www.expedia.co.uk), [www.uk.hotels.com](http://www.uk.hotels.com), [www.ebookers.com](http://www.ebookers.com), [www.trivago.co.uk](http://www.trivago.co.uk), [www.vrbo.com/en-gbm](http://www.vrbo.com/en-gbm), and*
- *the following companies operating Expedia Group websites in Australia (including those websites further listed): Expedia, Inc (US), Hotels.com, LP (US), Stayz Pty Ltd (Australia), Trivago NV (Netherlands). Non-exhaustive list of Australian websites: [www.expedia.com.au](http://www.expedia.com.au), [www.au.hotels.com](http://www.au.hotels.com), [www.stayz.com.au](http://www.stayz.com.au), [www.wotif.com](http://www.wotif.com), [www.trivago.com.au](http://www.trivago.com.au), [www.vrbo.com/en-au](http://www.vrbo.com/en-au).*

As of December 31, 2022, Expedia Group has a team of 16,500 employees across more than 50 countries with 104 offices globally.

## OUR BUSINESS & PRINCIPLES

Expedia Group (NASDAQ: EXPE) is one of world's largest travel platforms. We leverage our platform and technology capabilities across an extensive portfolio of businesses and brands to deliver travel experiences on both a global and local scale, helping people experience the world in new ways and build lasting connections.

Our platform includes travel products and services provided by partners offering lodging accommodation, activities, air travel, cruises, car rentals, and other travel product and service offerings. We also offer travel and non-travel advertisers access to media and advertising services through our websites.

Our mission is to power global travel for everyone, everywhere. We believe that travel is a force for good. Our business seeks to open the travel ecosystem to people around the world, by powering Expedia Group's platform to bridge barriers and shape a more inclusive and sustainable world.

We believe that human rights are foundational to our company values and affirm them as a driving force behind decisions that we make, in line with our [Global Citizenship statement](#), approved by our Board of Directors in 2021. In keeping with this belief, we take our roles in the travel industry seriously and are working to play our part in the issue

of modern slavery and human trafficking prevention and eradication. Expedia Group respects human rights and workplace rights and is committed to conducting its business in a manner that protects these rights, and prohibits and opposes all forms of modern slavery, servitude, forced labor and human trafficking.

We look to global leaders like the United Nations (UN) and the International Labour Organization (ILO) for guidance. We are committed to upholding the UN Guiding Principles on Business and Human Rights and the Core Conventions of the ILO, as well as the ILO Declaration on Fundamental Principles and Rights at Work. We evaluate our policies to make sure they're up to date and aligned with the latest industry standards.

In an effort to effectively integrate human rights considerations across all facets of our work, Expedia Group is in the process of embedding a human rights approach across the company following a formal Human Rights Salience Assessment. This approach is based on the UN Guiding Principles on Business and Human Rights ("UNGPs"). 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's Modern Slavery Statement and the work done in preparing this Statement has sought to identify and mitigate the risk of modern slavery in its business and supply chain in accordance with the United Kingdom and Australian modern slavery laws, *Modern Slavery Act 2015* (UK) and *Modern Slavery Act 2018* (Cth).

## **OUR POLICIES & PRACTICES**

By building out and enhancing our programs and partnerships, we aim both to provide the culture, tools and pathways for the prevention of human trafficking and modern slavery in our own direct operations, and to leverage a positive role in the travel sector by offering examples and tools that can influence and enable ever-improving work among our partners, such as airlines and hotels, where they face risk in relation to modern slavery and human trafficking prevention.

Consistent with our ongoing review of our business practices, and as the understanding of and approaches to address the complex issues of modern slavery and human trafficking develop, we expect to further refine our policies and practices where necessary and to assess areas for collaboration with our suppliers through which we can work together to further mitigate the risks of modern slavery within our businesses and supply chains.

We are committed to transparency to our stakeholders, including sharing information that will allow our customers, users, and partners to make decisions in line with a human rights-based approach.

## **OUR SUPPLY CHAIN**

As Expedia Group's own business does not extend to operating planes, hotels, vacation rentals, rental cars, guided tours, cruise ships or other direct travel operator services, we consider our risk of exposure to modern slavery within our own business to be low.

However, Expedia Group is conscious of the supply chain and travel industry in which we operate, and that higher risks of modern slavery exist in those contexts.

## DUE DILIGENCE PROCESS

We continue to seek ways to utilize our systems to assist our travel suppliers and partners in identifying potential instances of human trafficking and enhance their own monitoring. In the past 12 months these efforts have included:

- Participating 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.
- Initiating the implementation of a contract lifecycle management system that will enable Expedia Group to improve its contract review and due diligence processes.

As we continue to enhance and develop our efforts, Expedia Group will monitor, manage, and track performance against this Statement and our human rights commitments to achieve continual improvement. We report our human rights performance on an annual basis as part of our Global Impact Report which details our progress over the course of the previous 12 months.

## VENDORS

We endeavor to maintain business relationships with travel suppliers and third-party vendors that are committed to respecting human rights and workplace rights. Expedia Group expects its supply chain to adhere to its [Vendor Code of Conduct](#), which is referenced in our standard agreements.

The *Vendor Code of Conduct* sets out our foundational expectations in relation to all supplier and third-party vendor behavior and activity, including the area of combatting modern slavery. The *Vendor Code of Conduct* requires, in relevant part, that vendors:

- Use **only voluntary labor and prohibit the use of human trafficking in their operations**. The use of forced labor by an Expedia Group Vendor and/or its subcontractors is prohibited.
- Workers must **not** be required to **surrender government issued ID, passports or work permits** as a condition of working and may only hold such documents as necessary to complete legitimate administrative and immigration processing.

Expedia Group will not knowingly work with third-parties who engage in these practices. Third-parties are expected to fully comply with requirements of applicable slavery, forced labor and human trafficking laws, including without limitation the United

Kingdom and Australian modern slavery laws, *Modern Slavery Act 2015* (UK) and *Modern Slavery Act 2018* (Cth). Noncompliance with Expedia Group's *Vendor Code of Conduct* can lead to Expedia Group ceasing to do business with a vendor or supplier.

## EMPLOYEES

At Expedia Group, we have multiple codes of conduct that incorporate our corporate expectation of legal and ethical conduct. [Our Employee Code of Conduct - the Boarding Pass](#) (our "**Code of Conduct**") sets forth our core principles and values, and expectations regarding responsible and ethical business conduct. As such, our Code of Conduct provides the standards of integrity that Expedia Group requires all our employees to follow. Our Code of Conduct is our commitment to act ethically and with integrity in all our business relationships, including respecting human rights and workplace rights, opposing modern slavery and human trafficking of any kind, as well as providing guidance on how to report any violations of our Code of Conduct.

Violations of our Code of Conduct by our employees may subject them to disciplinary action, including dismissal (unless prohibited by law). We also reserve the right, pursuant to contractual provisions or to the extent permitted by law, to terminate relationships with third-parties who violate our Code of Conduct or who otherwise engage in illegal activities.

Similarly, the [Code of Business Conduct and Ethics for Directors and Senior Financial Officers](#) sets forth the same expectations for our Board of Directors and Senior Financial Officers of the company.

### Whistleblowing Policy

Expedia Group maintains a twenty-four-hour phone hotline (managed by an independent third-party, EthicsPoint) for employees and third-parties to raise concerns without fear of retaliation. Employees and third-parties can anonymously and confidentially report any concerns, which may include concerns relating to modern slavery and human trafficking. These reports are then investigated in accordance with company policies and procedures.

### People Team Policies

Expedia Group respects and values our employees. To ensure that our employees are not subject to undue influence and are treated fairly and with respect, we have human resource policies and procedures, as well as recruitment processes, in place across all of our operations. Expedia Group is committed to maintaining an environment where its employees are able to raise concerns and issues. All Expedia Group employees are required to adhere to our Code of Conduct annually.

## AWARENESS AND TRAINING

As indicated above, Our Code of Conduct specifically asserts Expedia Group's respect for human rights and opposition to human trafficking. We require all of our directors and employees, including all executive officers and senior financial officers, to comply with our Code of Conduct. At new hire orientation and training, and annually thereafter via Workday Learning, all employees receive a copy of and are required to attest to receiving and understanding our Code of Conduct. Leaders are provided with completion data for their teams and a communications campaign leveraging multiple channels helps ensure all employees complete the training.

Additionally, Expedia Group has worked with the Businesses Ending Slavery & Trafficking (BEST) Alliance to roll out an optional workplace and supply chain awareness training to assist our employees in identifying signs and forms of sexual and labor trafficking. Thanks to this collaboration, the latest BEST training is available to Expedia Group employees through internal channels.

## SOCIAL IMPACT ENGAGEMENT

We have a strong culture of engagement both within our company and with the cultures and communities in which we work. We encourage, support, and have direct action programs at multiple levels of civil society engagement, including across Inclusion & Diversity, Social Impact, and Sustainable Travel.

Our Global Impact Report can be viewed [here](#) and our Global Inclusion & Diversity Report can be viewed [here](#).

We also engage in a number of initiatives focused on eradicating modern slavery and human trafficking at the broader industry level, including in particular:

- Being a founding member of the anti-trafficking task force within the World Tourism Trade Council.
- Partnering with UNESCO to form the UNESCO Sustainable Travel Pledge, an open-industry initiative first piloted in Thailand, and recently expanded to operate across the globe, with a strong focus on community engagement and support, to strengthen local communities, including in tourism destinations that may otherwise be at risk to modern slavery and trafficking.
- Being a member of Business for Social Responsibility's (BSR) Human Rights Working Group which convenes over 40 global, cross-industry companies to share best practices, learnings, and challenges around implementing the UNGPs. BSR also creates space for learning about foundational human rights approaches and strategies for identifying and addressing emerging issues, including modern slavery and human trafficking.

## CONCLUSION

This Statement on behalf of Expedia Group, Inc. and its subsidiaries is for the financial year ending 31 December 2022 was approved by the Executive Committee of the Board of Directors of Expedia Group, Inc. on 21 June 2023 and will be updated annually.

A handwritten signature in black ink, appearing to read "Peter Kern". The signature is fluid and cursive, with a long horizontal stroke at the end.

Peter Kern  
Vice Chairman and CEO