



2024 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”), including Booking.com BV, Booking.com Customer Service Center (UK) Limited and Booking.com Transport Limited, to assess, prevent, and mitigate modern slavery in our operations and supply chains.

We prepared this Statement in consultation with our brands and subsidiaries and in accordance with the UK Modern Slavery Act 2015 (the Modern Slavery Act), for the financial year ending on December 31, 2023.

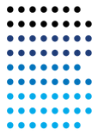


OUR STRUCTURE, OPERATIONS, AND SUPPLY CHAINS

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. Our mission is to make it easier for everyone to experience the world.

We offer services through five primary consumer-facing brands: Booking.com, Priceline, Agoda, KAYAK, and OpenTable, which allow consumers to: book a broad array of accommodations (including hotels, motels, resorts, homes, apartments, bed and breakfasts, hostels, and other alternative and traditional accommodations properties) and flights to their destinations; make a car rental reservation or arrange for an airport taxi; make a dinner reservation; or book a vacation package, tour, activity, or cruise.

Consumers can also use our meta-search services to easily compare travel reservation information, such as flight, hotel, and rental car reservations from hundreds of online travel platforms at once. In addition, we offer other services to consumers, travel service providers, and restaurants, such as travel-related insurance products and restaurant management services.



Booking.com

Booking.com is the world's leading brand for booking online accommodation reservations, based on room nights booked, with operations worldwide and headquarters in Amsterdam, The Netherlands. As of December 31, 2023, Booking.com offered accommodation reservation services for approximately 3.4 million properties in over 220 countries and territories and in over 40 languages, consisting of over 475,000 hotels, motels, and resorts and over 2.9 million homes, apartments, and other unique places to stay. In 2023, Booking.com offered flights in 55 markets and in-destination tours and activities in 1,300 cities around the world. Booking.com offers online rental car reservation services in approximately 42,000 locations throughout the world and ground transportation services at over 1,900 airports throughout the world, with customer support in over 40 languages.

Priceline

Priceline is a leader in the discount travel reservation business, offering online travel reservation services primarily in North America, with headquarters in Norwalk, Connecticut, USA. Priceline offers consumers hotel, flight, activity, and rental car reservation services, as well as vacation packages, cruises, and hotel distribution services for partners and affiliates.

Agoda

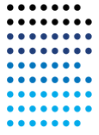
Agoda is a leading online accommodation reservation service catering primarily to consumers in the Asia-Pacific region, with headquarters in Singapore. Agoda also offers flight, ground transportation, and activities reservation services.

KAYAK

KAYAK, headquartered in Stamford, Connecticut, USA, provides online meta-search services that allow consumers to easily search and compare travel itineraries and prices from hundreds of online travel platforms at once. KAYAK offers its services in over 60 countries and territories, with its largest market in the United States, through various websites including momondo, Cheapflights, and HotelsCombined. In 2023, KAYAK owned a limited number of hotels in the United States and Mexico which were managed by a third party.

OpenTable

OpenTable is a leading brand for booking online restaurant reservations. Headquartered in San Francisco, California, USA, OpenTable provides online restaurant reservation services to consumers and reservation management services to restaurants, primarily in the United States.



OUR WORKFORCE

As of December 31, 2023, we employed approximately 23,600 employees. Approximately 99% of our employees are full-time employees. We also retain independent contractors, including to support our customer service, website content translation, and system support functions.

OUR APPROACH

Respecting Human Rights and Addressing Modern Slavery

We respect the human rights of our stakeholders by seeking to avoid infringing on the rights of others and working to address adverse human rights impacts with which we may be involved, including modern slavery risks.

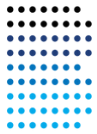
Our commitment is based on internationally recognised standards and principles, including the [United Nations \(UN\) Guiding Principles on Business and Human Rights](#).

We recognise that modern slavery in all its forms (including slavery, human trafficking, forced or compulsory labour, debt bondage, descent-based slavery, servitude, child labour, and forced and early marriage) is a global issue and an increasing problem.

Booking Holdings Inc. expects any human rights concerns are raised through the appropriate reporting channels. The use of our [Compliance Helpline](#) is not restricted to only our employees—any external party can report concerns of modern slavery through our Helpline.

As a company that facilitates global travel, we recognise that there are potential risks of modern slavery in our operations and supply chains, including in sectors where elevated modern slavery risks have been identified, such as 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.





OUR ACTIONS

After assessing and considering the impact of the Modern Slavery Act on our business, we completed the following actions, which we continue to evaluate, review and enhance where appropriate.

EMBED POLICIES

Code of Conduct – Our Core Values, [Code of Conduct](#), and corporate policies all reflect and convey our collective commitment to Absolute Integrity, which is the bond that unites us and is woven into everything we do. All directors, officers, and employees, wherever they are located, are expected to adhere to the Code of Conduct and espouse the principles and values it embodies at all times. The Code of Conduct outlines our commitment to respect and promote human rights.

Supplier Code of Conduct – We expect our Suppliers to share our commitment to our value of Absolute Integrity and adhere to the highest ethical standards, all applicable laws, and the requirements established in our Supplier Code of Conduct when doing business with us.

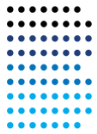
The [Supplier Code of Conduct](#) outlines our requirement for suppliers to adhere to human rights, workplace respect, and diversity and inclusion principles. Under no circumstances should a supplier use forced labour, whether in the form of compulsory or trafficked labour, bonded labour, indentured labour, or other forms. Mental and physical coercion, slavery, and human trafficking are prohibited.

Human Rights Statement – Our company-wide [Human Rights Statement](#) sets out our commitment to respect and promote human rights, our expectations of our employees, customers, suppliers, partners, and affiliate partners, our prioritisation of salient human rights risks and opportunities, and our governance of these risks.

Fair Pay – We remain committed to paying our employees a fair salary and benchmark salaries annually.

Contractual Clauses – We continue to review and update our contractual terms and agreements with a view to requiring our suppliers to adhere to legal protections against modern slavery. Booking Holdings Inc. and Booking.com's procurement contracts for suppliers include provisions obligating compliance with applicable laws related to modern slavery. Booking.com's General Delivery Terms for accommodation partners require respect for human rights, including prohibitions on child labour, forced labour and unsafe working conditions. All of our brands require compliance with equivalent local laws and regulations, and our Code of Conduct principles. 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.

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.



IDENTIFY, ASSESS & ADDRESS IMPACT

Screening and Due Diligence – We conduct screening throughout our value chains to detect parties and organisations that are subject to restrictions, including those associated with modern slavery offences under applicable sanctions regimes. Should any parties fail the screening process, we have the ability to suspend and, if necessary, terminate our relationship(s) with them.

Independent Modern Slavery Risk Assessment – We worked with an independent human rights expert consultancy on a human rights impact assessment to examine where our business may be at risk of modern slavery. We are taking steps to improve our efforts to detect, disrupt and increase awareness of modern slavery risks across our supply chains.

Digital Services Act Risk Assessment – The European Union’s Digital Services Act (DSA) aims to create a safer digital space where the fundamental rights of users are protected. Booking.com conducted its first annual DSA risk assessment, aimed at identifying and assessing systemic risks in the EU stemming from the design or functioning of its service or from the (mis)use of its services, including the risk of human trafficking. The results of this assessment have been shared with the European Commission and will be made publicly available in 2024.

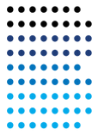
Detection and Response – Booking.com has response capabilities to address confirmed human trafficking on its platforms. This includes standard operating procedures and reporting channels for accommodation partners and travellers, as well as machine learning models to detect potential human trafficking issues. Analysts assess reported or detected issues and blocklist accommodation partners and travellers for misconduct.

TRAINING

Employee Training – Booking.com has mandatory training on human trafficking and child sexual exploitation prevention for Customer Service and External Partner Services teams, which consist of external-facing staff who are more likely to encounter modern slavery risk escalations from customers and travel partners. The targeted training was completed by 4,000+ staff in 2023.

Accommodation Partner Training – Booking.com also published articles on its Partner Hub to educate and support partners on human rights and, trust and safety issues, including on human trafficking. This includes partnering with ECPAT-USA to develop human trafficking and child exploitation training for both internal teams and Booking.com accommodation partners. This will help Booking.com better assess, mitigate, and remedy reports of potential human trafficking that it receives, and will help partners identify signs of trafficking and how best to respond and report suspected trafficking at their accommodation site.

Industry Training – Booking.com is collaborating with 14 other companies and civil society organisations to create human rights due diligence training for the tourism sector, led by the Roundtable on Human Rights in Tourism and Futouris. The training includes topics on modern slavery, decent living and fair wages.



STAKEHOLDER ENGAGEMENT

The Code – Booking.com is a member of [The Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism](#) and is working on internal policies and processes to address the risk of child exploitation in its supply chains.

Industry Awareness – In 2023, Booking.com participated in and presented at an event addressing barriers for transnational child sexual abuse. This event was organised as part of the “Don’t Look Away” campaign in the Netherlands, a collaboration between the Ministry of Justice and Security, Royal Military Police, National Police, National Rapporteur on Human Trafficking and Sexual Affairs Violence against Children, the ANVR, TUI Nederland, Corendon, ANWB, Defense for Children – ECPAT, Terre des Hommes, Free a Girl and Plan International Netherlands.

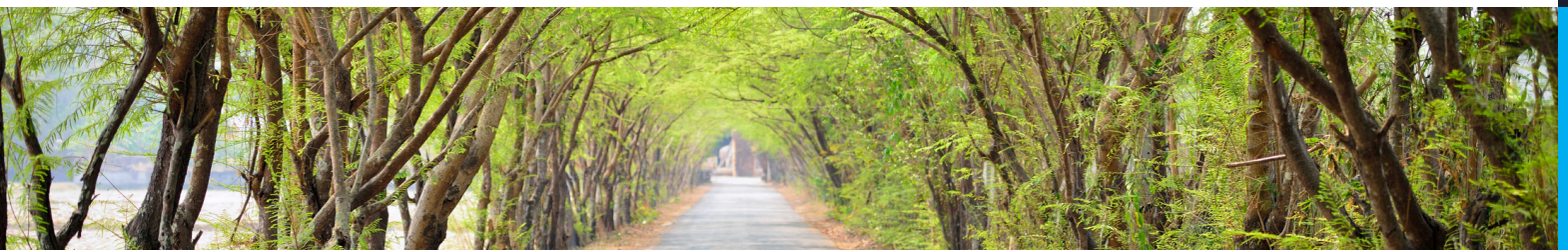
Booking.com also organised a panel discussion at the 2023 Trust & Safety Professional Association Summit in Singapore, highlighting the opportunities for collaboration between the private sector and civil society on human trafficking and child sexual exploitation.

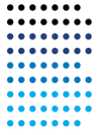
We are further working to expand our collaboration with experts in this space to improve our ability to detect, react, and prevent human trafficking and modern slavery risks in our operations and supply chain.

GRIEVANCE MECHANISM

Internal Mechanisms – We place a duty upon all employees to report either potential or actual violations of our policies, including potential or actual modern slavery risks, to their line manager, the Compliance Team, or the [Compliance 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 received through the Helpline are addressed and if appropriate, remedial action is taken. Annually, we publish an internal compliance report where colleagues can see aggregated data on reports the Compliance team has received through the Helpline and other means.

External Mechanisms – Suppliers and members of the community are also directed to the [Compliance Helpline](#) to report any breaches of the Supplier Code of Conduct or any human rights concerns. Additionally, Booking.com accommodation partners, as well as suppliers and travellers, are encouraged to report any violations of the Supplier Code of Conduct by contacting Booking.com’s partner or customer services directly. These reports are redirected internally to our Trust & Safety team which will, then, perform a thorough assessment of the report and take appropriate remedial action.





TRACK & REPORT

[The UK Modern Slavery Registry](#) – On the 11th March 2021, the UK Government launched a Modern Slavery Statement Registry. We submitted our 2021 and 2022 Modern Slavery Statements to the registry and are committed to submitting all subsequent Statements to the Registry.

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

[Regulatory Review](#) – We monitor regulatory developments of the UK Modern Slavery Act 2015 and are committed to promptly implementing any changes or requirements that come into effect.

APPROVAL

Approved and signed on behalf of the Board of Directors by its Corporate Governance Committee at a meeting on April 8, 2024.

