Company Commitment to a Discrimination and Harassment Free Environment

Expedia Group and its brands and affiliated business entities (collectively, “Expedia”) is fully committed to providing equal employment opportunities in a cooperative and productive work environment free from unlawful discrimination and harassment. Discrimination or harassment on the basis of race, religious creed, color, national origin, ancestry, physical disability, genetic information, mental disability, medical condition, marital status, sex, pregnancy, gender, gender identity or expression, age, sexual orientation, military or veteran status, or any other characteristics protected by law is unacceptable and will not be tolerated. This policy applies at all locations where Expedia conducts business, including, but not limited to, Expedia’s offices and other work settings, during business travel, business meetings, and business-related social events. Expedia requires all of its employees, including supervisors and managers, to comply with this policy when interacting with fellow employees, customers, visitors, vendors, suppliers and anyone else employees interact with in connection with Expedia business.

Discrimination

Consistent with applicable law, Expedia will make all employment decisions based solely upon individual merit and qualifications directly related to professional competence and job requirements. This applies to all aspects of employment, including job application procedures, hiring, compensation, promotion or advancement, training, corrective action, termination, and any other term, condition, or privilege of employment. Expedia is dedicated to ensuring equal employment opportunities for persons with disabilities and is committed to complying fully with the Americans with Disabilities Act (ADA) and applicable State and local law. The Company will engage in the interactive process to make reasonable efforts to accommodate individuals with disabilities, as defined under applicable laws, unless doing so would create an undue hardship on the Company. Any qualified applicant or employee with a disability who requires an
accommodation in order to perform the essential functions of his or her job, should reach out to the Regional Human Resources Team to request the appropriate accommodation.

Harassment Generally

Harassment based on any protected characteristic is strictly prohibited. Such conduct may include, without limitation, verbal or physical conduct that denigrates, demeans, or shows hostility or aversion toward an individual because of a protected characteristic that:

- has the purpose or effect of creating an intimidating, hostile or offensive work environment;
- has the purpose or effect of unreasonably interfering with an individual’s work performance; or
- otherwise adversely affects an individual’s employment opportunities

Conduct not directed at a particular employee can still be harassing if an employee or employees reasonably deem the conduct offensive.

Sexual Harassment

Sexual harassment may include offensive or unwelcome sexual advances, verbal comments or innuendo of a sexual nature, words of a sexual nature used to describe a person or depict a situation, or the display of sexually suggestive objects or pictures. Comments, physical touching, or pictures not explicitly sexual in nature may also constitute sexual harassment in certain circumstances. Examples of behavior that Expedia considers sexual harassment include, for example, the following:

- Comments about another person’s anatomy, attire, or appearance.
- Jokes or remarks that are crude, demeaning, stereotypical or derogatory.
- Unwanted and persistent social invitations.
Unwanted sexual propositions.

Sexually explicit or obscene messages in any form.

Displays of pictures, posters, and/or cartoons that may be considered offensive.

Unwanted physical advances or contact such as unwelcome kissing, touching, pinching, patting, or fondling.

Offensive actions such as leering, or making sexually suggestive gestures.

Explicit or implicit harassing actions that affect a term or condition of employment (e.g., promotion, training, assignments, etc.).

Oversharing of personal information of a romantic or sexual nature, or intrusive questioning of another regarding personal matters.

As with other forms of harassment, not every act that might be offensive to an individual will necessarily be considered sexual harassment. In addition, Expedia’s expectations of professional conduct extend beyond the definitions of harassing behavior established by law. In determining whether improper conduct has occurred, the totality of the circumstances will be carefully reviewed and due consideration will be given to the protection of individual rights.

**Reporting and Investigating Complaints**

- Any employee who feels he or she has experienced, witnessed or otherwise learned of discrimination or harassment, should immediately report the situation, preferably in writing, to his or her supervisor, a Human Resources representative, or any management employee with whom he or she is comfortable.

- Any member of management, including supervisors, who is notified of any complaint of discrimination or harassment or is aware of anything that might constitute discrimination or harassment, must notify Human Resources immediately.

- All complaints will be promptly handled and thoroughly investigated in an impartial and timely manner by qualified personnel who will reach reasonable conclusions based on the information collected in the investigation. To the extent
possible and consistent with a fair investigation, all complaints will be kept confidential.

Corrective Action

If an investigation confirms discrimination, harassment or other improper behavior by an Expedia employee or person with whom Expedia has business dealings, the company will promptly take appropriate corrective action to resolve the situation. This may include discipline, up to and including termination of employment, and/or other changes in the work environment intended to ensure the inappropriate conduct has ended.

Retaliation

It is Expedia's policy that no person will be retaliated against for making a complaint of discrimination or harassment based upon an honest perception of events. Expedia also strictly prohibits retaliation against anyone for filing, testifying, assisting or participating in good faith in an investigation or proceeding involving allegations of discrimination or harassment.