



## **Global Human Rights Policy**

### **Effective Date: August 16, 2021**

Tripadvisor, Inc., together with its subsidiaries and controlled affiliates (collectively, the “Company”), is committed to establishing and maintaining best practices in respecting fundamental human rights and freedoms as a part of our corporate values. We believe that businesses have a responsibility to respect human rights and the ability to contribute to positive human rights impacts. Human rights have long been integrated into our work culture and the causes we support; our safe, inclusive and diverse workplace; and how we work with our users and partners. The Company has adopted this Global Human Rights Policy (this “Policy”) in order to codify our commitment and create more opportunities for engagement and collaboration with our employees, consultants, partners and stakeholders.

#### **I. Scope**

This Policy is applicable to all directors, officers, employees, consultants and contractors of the Company (the “Covered Persons”). Covered Persons are expected to read and understand this Policy, uphold these standards and take personal responsibility for compliance with this Policy and are encouraged to promptly raise any concerns regarding any human rights infringement. In addition, in order to ensure that the human rights of not only our employees, but those of the members of the communities we serve, are protected, we encourage our partners to prevent, mitigate and address adverse impacts on human rights and uphold this Policy’s principals in their own operations and business relationships.

#### **II. Our Commitment**

The Company is committed to respecting human rights. As a global leader in the travel industry, we also believe we have an opportunity to use our platform to effect positive change in people’s lives, including the advancement of human rights through our business activities.

Our approach in drafting this Policy is, and in subsequently creating the processes, procedures and systems to implement this Policy, will be informed by, among others, the United Nations Guiding Principles on Business and Human Rights /International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principals and Rights at Work.

This Policy, and the commitments contained herein, formalize our long-standing commitment to uphold and respect human rights for all people, first described in the Company’s Code of Business Conduct and Ethics (the “Code”) which states our commitment to “conducting our business affairs in accordance with not only the requirements of law but also standards of ethical conduct” and to human and workplace rights. This Policy consolidates our existing commitments and brings increased clarity on processes and procedures to assess and mitigate human rights risks, to avoid directly infringing on human rights and to prevent or mitigate adverse human rights impacts that are or potentially may be linked to our business. More specifically:

A. Compliance with Laws

The Company is committed to being a good “corporate citizen”. Complying with laws is the foundation on which the Company’s ethical standards are built. All Covered Persons must comply with all applicable laws, rules, regulations and regulatory orders applicable in the country, state and local jurisdictions where business is conducted. This includes, but is not limited to, U.S. embargoes which generally prohibit U.S. companies, their subsidiaries, and employees from doing business with, or traveling to, countries subject to sanctions imposed by the U.S. government, as well as doing business with specific companies and individuals identified on lists published by the U.S. Treasury Department. Separately, the Company requires that all service providers, vendors and partners comply with all applicable laws, rules, regulations and regulatory orders with respect to its performance of services (including, without limitation, laws regarding labor practices, anti-harassment and discrimination).

B. Labor Practices

The Company is committed to compliance with all applicable laws and regulations. Prohibited conduct under this Policy includes, but is not limited to, the following:

- Failing to comply with applicable laws and regulations regarding compensation, hours of work, overtime, and benefits.
- Failure to comply with child labor laws in accordance with applicable national law.
- Failure to respect employees' right to freedom of peaceful assembly and association, including their right not to be compelled to belong to an association and their right to choose whether or not to be represented for collective bargaining purposes.
- Failure to respect the right of freedom of opinion and expression, including the freedom to hold opinions without interference provided, however, that the exercise of such rights does not interfere with the safe and efficient performance of work by persons on working time.
- Failure to comply with all applicable health, safety, and security laws as well as the Company’s internal procedures.

C. Human Trafficking

The Company adopted a Modern Slavery Statement which condemns and prohibits in both our business and in our community those which support or condone, directly or indirectly, acts of human trafficking, physical abuse of workers, or any form of child labor, forced labor, slavery, or involuntary servitude.

D. Equity, Diversity and Inclusion

The Company is committed to championing the diverse perspectives, experiences, and voices of our employees, travelers, business partners, and industry peers. At Tripadvisor, we empower all of our employees to bring their unique perspectives and experiences to the table — this is what drives us to think bigger and be better. Through our Employee Resource Group program, we offer individuals a dedicated space to organize around shared experiences, identity, and interests. These groups create a sense of belonging through inclusive practices and programming that support personal, professional, and organizational growth.

E. Trust and Safety

A large percentage of our users say that safety and security are important considerations when making travel decisions. Through the Company's Trust and Safety team, the Company is committed to its mission of being the best source for travelers to find the most helpful, trusted advice and safety information for any destination. To deliver on this promise, the Company has engaged the broader community, including travelers, not-for-profit organizations, and our commercial partners across the tourism and hospitality sector, as we seek to meet the ever-changing needs of the global traveler. In addition, the Company has developed several new product features on the TripAdvisor platform that identify and elevate critical safety information for travelers' consideration.

F. Social Impact

The Company is committed to having a positive impact on the communities in which we operate and to use its influence to have a positive impact more broadly. The Company's efforts to have a positive social impact are led by TripGives which supports employee giving and service programs. The Company also collaborates with The Tripadvisor Foundation, a not-for-profit private foundation established with the mission to help strengthen human lives and communities around the world through a variety of programs.

G. Environmental Impact

The Company is committed to complying with environmental regulations, preserving and protecting the environment and reducing our environmental impact. The Company endeavors to reduce its use of energy and water and re-use or recycle the resources consumed by our business, wherever practical, and encourage the development and integration of sustainable technologies.

H. Responsible Procurement

The Company's procurement strategy is focused on working with suppliers who share our commitment to the Company's responsible business agenda and ethical standards of business. We are committed to promoting these principles with our partners and we strive to set expectations through our commercial agreements and procurement selection.

**III. Supporting Policies, Statements and Procedures**

The Company's policies and statements which are relevant to and support the principles set out in this Policy include the following:

- [Code of Business Conduct and Ethics](#)
- [Modern Slavery Statement](#)
- [Equity Diversity and Inclusion Statement](#)
- [Tripadvisor Terms, Conditions and Notices](#)

The Company recognizes that human rights due diligence is an ongoing commitment and the Company will continue to review and develop our policies, procedures and processes in support of these efforts.

**IV. Modification and Interpretation**

The Company reserves the right to modify, discontinue, or replace this Policy or any terms of the Policy at any time, with or without notice. In the event of a conflict between this Policy and applicable law, the applicable law will prevail.

**V. Enforcement**

Any alleged or actual violation of this Policy (a “Violation”), shall be treated as a serious matter and must be immediately reported to a manager, Human Resources representative, or the Compliance Officer. The Compliance Officer shall investigate the facts and circumstances surrounding any and all alleged Violations, after which the General Counsel, in consultation with the other members of the Compliance Committee, as appropriate, shall determine whether a Violation has occurred and take appropriate disciplinary action. Violation can be expected to result in serious sanctions by the Company, whether or not the violation of Company policy or procedure also constituted a violation of the law.

**VI. Administration**

The Compliance Officer shall have primary responsibility for the administration of this Policy, working with the appropriate members of other departments. This Policy shall be disseminated to key personnel responsible for administration promptly following its adoption and from time to time thereafter as Company management shall deem appropriate. If you have any questions regarding the Policy generally, please do not hesitate to contact the Compliance Officer.

**THE COMPANY RESERVES THE RIGHT TO SUBSTITUTE OR CHANGE THIS  
POLICY AT ANY TIME WITHOUT NOTICE**