

# EXPEDIA GROUP, INC. MODERN SLAVERY STATEMENT

## 1. Structure, Operations, Activities, & Supply Chain

### 1.1 Our Business & Principles

Expedia Group is the global travel marketplace with one purpose: to help travelers explore the world, one journey at a time. We connect travelers, partners, and advertisers throughout our trusted brands, leading technology, and rich first-party data, delivering predictive, personalized experiences that shape the future of travel. We leverage our supply portfolio, platform, and technology capabilities across an extensive portfolio of consumer brands, and provide solutions to our business partners, to empower travelers to efficiently research, plan, book, and experience travel. Expedia Group's three flagship consumer brands are Expedia®, Hotels.com®, and Vrbo®.

As of December 31, 2025, Expedia Group has a team of approximately 16,000 employees across nearly 50 countries with 89 offices globally.

Expedia Group respects human rights and workplace rights and is committed to conducting its business in a manner that protects these rights, and prohibits 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 (UNGPs) and the Core Conventions of the ILO, as well as the ILO Declaration on Fundamental Principles and Rights at Work.

In preparing this Statement, Expedia Group has sought to identify and mitigate the risk of modern slavery in its business and supply chain in accordance with the United Kingdom Modern Slavery Act 2015 (UK) and the Australian Modern Slavery Act 2018 (Cth).

### 1.2 Our Supply Chain

As Expedia Group does not directly operate planes, hotels, vacation rentals, rental cars, guided tours, cruise ships or other direct travel 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.

Expedia Group's supply chain primarily consists of travel service providers (hotels, airlines, car rental companies, cruise lines, vacation rental property owners and managers, and destination service providers) who list inventory on our platform, as well as technology vendors, professional services providers, Global Distribution System partners, payment processors, and facilities management providers that support our corporate operations. Our B2B segment also serves corporate travel management companies, offline travel agents, online retailers, and financial institutions.

In preparing this Statement, Expedia Group consulted with its subsidiaries and controlled entities through a cross-functional process, in coordination with the Human Rights Working Group (HRWG). The HRWG brings together representatives from Global Social Impact & Sustainability, Human Resources, Legal & Government Affairs, Physical Security, Public Relations & Communications, Strategy, Third-Party Service Provider management, and Trust & Safety teams to assess, address, track, and communicate human rights risks across the business.

## **2. Policies in Relation to Modern Slavery**

### 2.1 Our Policies & Practices

Expedia Group's [Human Rights Statement](#), approved by our Board of Directors, formalizes our long-standing commitment to respecting human rights, including those of our travelers, employees, business partners, and communities.

Our policy framework is informed by and aligned with international human rights standards including the UNGPs, the ILO Declaration on Fundamental Principles and Rights at Work, 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), the Convention on the Rights of the Child (CRC), the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), and the Convention on the Rights of Persons with Disabilities (CRPD).

We regularly review our policies as our understanding of modern slavery and human trafficking develops. We refine practices and assess opportunities to collaborate with suppliers to further mitigate modern slavery risks in our business and supply chains.

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

### 2.2 Vendors

We seek to maintain business relationships with travel suppliers and third-party vendors that are committed to respecting human rights and workplace rights. We expect our third-party providers to adhere to our [Vendor Code of Conduct](#), which is referenced in our standard agreements.

The Vendor Code of Conduct contains our foundational expectations in relation to all supplier and third-party vendor behavior and activity, including the area of combating 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. Noncompliance with Expedia Group's Vendor Code of Conduct can lead to Expedia Group ceasing to do business with a vendor or supplier.

In 2025, Expedia Group began implementing a new source-to-pay procurement management platform. The new vendor onboarding form collects information on whether vendors have evaluated their labor practices, maintain human rights commitments, practice ethical supply chain management, and have a documented Human Rights Policy aligned with frameworks such as the UNGPs.

### 2.3 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. Our Code of Conduct provides the standards of integrity that Expedia Group requires all our employees to follow. It 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, and providing guidance on how to report any violations of our Code of Conduct.

Employees who violate our Code of Conduct may subject themselves 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 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 our operations. Expedia Group is committed to maintaining an environment where its employees are able to raise concerns and issues.

### **3. Risk Management Process**

Expedia Group takes a structured approach to identifying and assessing modern slavery risks across its operations and supply chains. In line with the UNGPs, Expedia Group commissioned a human rights salience assessment led by BSR (Business for Social Responsibility). The assessment identified and evaluated Expedia Group's impacts on human rights, outlined opportunities to integrate findings into business practice, and included engagement with third-party issue experts and potentially impacted rightsholders.

Implementation of Expedia Group's modern slavery risk management is led by the HRWG, a cross-functional body that meets quarterly to assess, address, track, and communicate human rights risks across the business. Oversight is provided by our VP of Global Social Impact & Sustainability, with leadership support from our Chief Legal & People Officer and the ESG Steering Committee, composed of senior executives across key corporate functions. The Steering Committee meets quarterly, or as needed, to discuss strategic implementation, including human rights. The Chief Legal & People Officer updates the Board of Directors or appropriate Board committee on responsible business progress, and the VP of Global Social Impact & Sustainability provides annual updates on human rights matters.

As a digital marketplace that does not directly operate flights, hotels, vacation rentals, car rentals, guided tours, cruise ships or other direct travel services, Expedia Group considers its direct operational risk of exposure to modern slavery to be low. However, we recognize that the broader travel industry supply chain — including accommodation providers, ground transportation, and facilities management services — may present elevated risks. Our risk management approach focuses on these areas through the due diligence processes and partnerships described in Section 4.

### **4. Due Diligence Process & Remediation**

#### 4.1 Due Diligence Process

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

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- Participating in the Blue Lightning Initiative under the U.S. Department of Homeland Security and the US Department of Transportation by which we work with those Departments, the US Department of Justice, and the 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.

- Joining a sector-wide initiative led by BSR to address heightened human trafficking risks associated with the 2026 FIFA World Cup. The initiative brings together travel and hospitality companies to develop a voluntary anti-trafficking standard, a modular implementation toolkit for hotel operators and online platforms, and a cross-industry intelligence-sharing framework to support anonymized data exchange and early-warning systems.
- Developing and promoting a Human Trafficking Awareness in the Travel Industry training for employees, in partnership with Polaris Project. The course equips employees with a foundational understanding of trafficking in the travel industry and how to identify and respond to potential indicators.
- Supporting Polaris Project's Data Upgrade Program, which leverages data to generate predictive and actionable insights for the anti-trafficking movement, and the National Human Trafficking Hotline, a 24/7 resource available anywhere in the U.S. for reporting, seeking services, and requesting help.
- Contributing to No Room for Trafficking, a Canadian hotel sector initiative that unites over 8,000 hotels in coordinated training to strengthen industry-wide trafficking prevention efforts.
- Supporting Real Escape from the Sex Trade (REST) to provide safe shelter, mental health counseling, and employment assistance to survivors across the U.S.

As we continue to develop our efforts, we will report updates as part of our annual Global Impact Report.

#### 4.2 Grievance Mechanisms & Remediation

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.

Where an instance of modern slavery or human trafficking is identified in Expedia Group's operations or supply chain, the matter would be escalated for investigation through the Ethics Helpline process, with involvement from Legal and relevant business functions. Remediation actions may include corrective measures with the vendor or supplier, termination of the vendor or supplier agreement, and referral to relevant law enforcement authorities. As stated in our Vendor Code of Conduct, Expedia Group will not knowingly work with third parties who engage in forced labor, human trafficking, or related practices, and non-compliance can lead to termination of the business relationship.

## 5. Training

### 5.1 Awareness & Training

Our codes of conduct specifically assert Expedia Group's respect for human rights and opposition to human trafficking. We require all our directors and employees, including all executive officers and senior financial officers, to comply with our codes of conduct. At new hire orientation and training, and annually thereafter, all employees receive a copy of and are required to attest to receiving and understanding our Code of Conduct. We use multiple corporate channels to direct employees to complete this training, and leaders receive completion data for their teams.

The Code of Conduct training is mandatory annually for all Expedia Group employees, who must achieve a 100% score to pass. The training reinforces Expedia Group's commitment to human rights and its opposition to all forms of modern slavery and human trafficking.

Additionally, we developed a Human Trafficking Awareness Training for Expedia Group employees, in partnership with Polaris. The course introduces the complexities of human trafficking in the travel industry, addresses misconceptions, and explains how to respond.

## 6. Assessment of Effectiveness

Expedia Group assesses the effectiveness of its actions to identify and address modern slavery risks through a combination of governance mechanisms, training metrics, reporting data, and continuous review.

### 6.1 Governance & Monitoring

As mentioned in Section 3, implementation of Expedia Group's modern slavery risk management is led by the HRWG, a cross-functional body that meets quarterly to assess, address, track, and communicate human rights risks across the business. Oversight is provided by our VP of Global Social Impact & Sustainability, with leadership support from our Chief Legal & People Officer and the ESG Steering Committee, composed of senior executives across key corporate functions. The Steering Committee meets quarterly, or as needed, to discuss strategic implementation, including human rights. The Chief Legal & People Officer updates the Board of Directors or appropriate Board committee on responsible business progress, and the VP of Global Social Impact & Sustainability provides annual updates on human rights matters.

### 6.2 Key Indicators

Expedia Group monitors the following indicators to assess the effectiveness of its actions:

- Training Completion: All employees are required to complete annual Code of Conduct training, which includes human rights commitments. Additionally, the

Human Trafficking Awareness training developed with Polaris is available to all employees.

- Ethics Helpline Reports: Expedia Group monitors all reports received through its EthicsPoint helpline, including any reports related to modern slavery, human trafficking, or forced labor. All reports are investigated by a dedicated internal team.
- Vendor Compliance: Expedia Group embeds an agreement to its Vendor Code of Conduct in standard vendor agreements and requires compliance from all third-party vendors with active agreements. Global procurement also implemented a new source-to-pay procurement solution that adds human rights and labor practice screening to vendor onboarding, enhancing Expedia Group's ability to gain visibility into vendor human rights and labor practices at the point of engagement.
- Partnership Outcomes: Expedia Group's partnerships with Polaris Project and the Blue Lightning Initiative continue to provide expert consultation, data insights, and law enforcement collaboration.

### 6.3 Outcomes

During the reporting period, Expedia Group's monitoring processes did not identify any instances of modern slavery within its operations or supply chain.

### 6.4 Continuous Improvement

Based on our ongoing review, Expedia Group continues to identify areas for development across its human rights and modern slavery response. We are advancing our Human Rights Due Diligence program, with a focus on deepening our understanding of risks related to our priority salient issue areas, including modern slavery. We are also continuing to enhance our vendor due diligence processes, including exploring opportunities to strengthen human rights and labor practice screening. Additionally, we are building on our employee training initiatives related to human trafficking awareness and evaluating opportunities to extend awareness resources more broadly across our platform.

## **7. Conclusion**

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.

In preparing this Statement, Expedia Group consulted with the subsidiaries and controlled entities covered by this Statement<sup>1</sup>.

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<sup>1</sup> 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

This Statement on behalf of Expedia Group, Inc. and its subsidiaries is for the financial year ending 31 December 2025 and was approved by the Executive Committee of the Board of Directors of Expedia Group, Inc. on 25 June 2026 and will be updated annually.



Ariane Gorin  
CEO

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Ireland Limited (UK), Trivago NV (Netherlands). Non-exhaustive list of UK websites: <https://www.expedia.co.uk/>, <https://www.uk.hotels.com/>, <https://www.ebookers.com/>, <https://www.trivago.co.uk/>, <https://www.vrbo.com/en-gb>, 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: <https://www.expedia.com.au/>, <https://www.au.hotels.com/>, <https://www.hotels.com.au/>, <https://www.stayz.com.au/>, <https://www.wotif.com/>, <https://www.trivago.com.au/>, <https://www.vrbo.com/en-gb>, <https://www.vrbo.com/en-au>.