

Policy Statement

Tripadvisor, Inc. and its subsidiaries (collectively, the “Company”) are committed to conducting its business safely and with honesty and integrity. A culture of openness and accountability is essential to prevent illegal or unethical conduct and to address such conduct when it does occur. The Company has adopted this Global Whistleblower Policy (this “Policy”) applicable to all shareholders, directors, officers, employees, contractors, consultants, volunteers, paid and non-paid trainees, as well as any other former employees, non-employees who work under the supervision and direction of contractors, subcontractors and suppliers of the Company, including those whose work-relationship is yet to begin but has obtained information regarding a potential concern during the recruitment process or other pre-contractual negotiation with the Company, or who obtained information regarding a potential concern in a work-related context with the Company which has since ended (the “Covered Persons”). Covered Persons are encouraged and expected to promptly raise any concerns of suspected wrongdoing as outlined in this Policy.

I. Purpose and Scope

In keeping with the Company’s commitment to create a culture of authenticity and responsibility, the Company, through this Policy, has established procedures for the receipt, retention, and treatment of complaints and concerns, as well as for the submission of complaints through confidential and anonymous channels.

The procedures cover complaints or concerns regarding the following suspected wrongdoing:

- (i) Questionable accounting, internal accounting controls, financial reporting, or auditing matters (in each case, a “Financial Complaint”), that include:
 - any deficiency in or failure to comply with the Company’s internal accounting controls;
 - any fraud or deliberate error in recording financial data or maintaining financial records of the Company;
 - any fraud or deliberate error in preparing, evaluating, reviewing, or auditing any financial statement of the Company;
 - any misrepresentation or false statement to or by a senior officer or accountant concerning any matter contained in the financial

- records, financial reports, or audit reports of the Company; and
 - any deviation from full and fair reporting of the Company’s financial condition and/or its results of operations.
- (ii) Acts or omissions that may constitute a violation of Federal securities laws.
- (iii) Any other acts or omissions that may constitute infringements of all applicable law, including European Union (“EU”) law, or defeat the objective or purpose of these laws, including those that concern the following areas:
- Public procurement;
 - Financial services, products, and markets, and prevention of money laundering and terrorist financing;
 - Product safety and compliance;
 - Transport safety;
 - Protection of the environment;
 - Radiation protection and nuclear safety;
 - Food and feed safety, animal health and welfare;
 - Public health;
 - Consumer protection;
 - Protection of privacy and personal data, and security of network and information systems;
 - Bribery;
- (iv) Breaches affecting the financial interests.
- (v) Breaches relating to the EU internal market, including infringements of the EU rules on competition and aid granted by the states, as well as infringements relating to the internal market in relation to acts that infringe the corporate tax rules or practices aimed at obtaining a tax advantage that distorts the object or purpose of the legislation applicable to corporate tax.
- (vi) Acts or omissions that may constitute a serious or very serious criminal or administrative offense. In any case, all those serious or very serious criminal or administrative offenses that involve economic losses for the Public Treasury and for the Social Security will be understood to be included.
- (vii) Acts or omissions that may constitute fraud, corruption, malpractice, mismanagement, abuse of authority or failure to comply with legal and regulatory obligations or ethical practices.
- (viii) Any acts or omissions that may constitute infringements of other codes or internal policies applicable to the Company.

For the sake of clarity, a matter concerning interpersonal grievances exclusively affecting a reporting person, namely, grievances about interpersonal conflicts between the reporting person and another worker, or a matter concerning a complaint by a reporting person to, or about, his or her employer which concerns the worker exclusively, shall not be in scope of this Policy and shall be dealt with via

the procedures of the relevant human resources (“HR”) department of the Company.

II. Reporting Procedures

The Company takes concerns or complaints seriously. Covered Persons wishing to submit concerns or complaints under this Policy can utilize the Company’s [#BeHeard](#) Outreach Platform, which includes the ability for Covered Persons to report anonymously. Current Company employees may additionally submit reports via the #BeHeard Outreach Program app (powered by Vault), available on the [Apple App Store](#) or [Google Play Store](#).

All Covered Persons may submit reports in writing via the #BeHeard Outreach Platform [webpage](#). Alternatively, Covered Persons may choose to submit their complaints via telephone utilizing the following phone lines:

- Australia: +61 255031217
- Belgium: +32 460200491
- Canada: +1 236 309 2275
- France: +33 1 59 13 1198
- Germany: +49 8962824359
- Ireland: +353 1 592 4209
- Italy: +39 06 4008 5179
- Netherlands: +31 970102 08885
- Poland: +48 81 470 95 82
- Portugal: +351 923 241 532
- Romania: +40 373 807 997
- Spain: +34 930 34 52 93
- Sweden: +46 8 525 160 20
- Switzerland: +41 91 239 15 00
- UK: +44 7480 789103
- US: +1 240 297 3966

If required by applicable laws, the Company shall offer to the Covered Person an opportunity to verify and rectify the transcript of any call to any of the registered numbers listed above.

In addition to the above communication channels, the Covered Person may also be entitled to request a face-to-face meeting to submit the complaint, this can be done by emailing compliance@tripadvisor.com. In such an event, a meeting would be convened shortly thereafter and in accordance with any applicable local law timeframes.

If required by the applicable laws, the Company shall send acknowledgment, in writing, to the Covered Person of receipt of the complaint not more than seven (7) days after receipt of it.

The Company shall maintain a record of all submitted complaints and concerns including key information, for example relevant dates, case details, etc.

The Company does not tolerate retaliation against anyone who speaks openly about conduct they believe is contrary to this Policy – even if the concern is ultimately found to be unsubstantiated, as long as they have not knowingly made a false report.

III. Designated Personnel Handling Complaints

Where required by local laws, the Company shall appoint a designated individual or team of individuals responsible for receiving, investigating, and addressing whistleblower complaints.

The designated personnel shall have the following key responsibilities:

- Receive and acknowledge whistleblower reports;
- Ensure that all reports are treated confidentially and investigated promptly and thoroughly;
- Maintain open lines of communication with whistleblowers, where appropriate, to provide updates on the progress of investigations and actions taken;
- Protect whistleblowers from retaliation or adverse consequences resulting from their reports made in good faith or upon a reasonable belief; and/or
- Keep accurate and secure records of all complaints received, investigations conducted, and outcomes, while respecting the anonymity of whistleblowers where applicable.

The designated personnel shall possess the necessary qualifications, training, and expertise to handle whistleblower complaints effectively and impartially.

The designated personnel shall operate independently and with sufficient authority, ensuring transparency and accountability in the handling of whistleblower complaints.

IV. Investigation

The Company, through its designated personnel, shall investigate and review the complaints or concerns submitted. The Company's maximum period for providing feedback to the person submitting the whistleblower complaint on the investigation may not exceed three months from receipt of the complaint or, if no acknowledgment of receipt was sent, three months from the expiration of the seven-day period following the communication, except in cases of particular complexity requiring an extension of the time limit, in which case it may be extended for a maximum of three additional months.

During the investigation, the Company may request further information, as necessary, including via meeting requests and other correspondence.

If the acts or omissions investigated could constitute a criminal offense, the information in the report may be referred to the appropriate law enforcement body or public authorities, in accordance with local laws.

Upon completion of the investigation or review, the designated personnel will share findings and recommended actions, subject to applicable confidentiality provisions, with an appropriate member of the management team including but not limited to, members of the applicable leadership team, Compliance Committee or the Audit Committee, as appropriate. Prompt and appropriate corrective or remedial action to address a complaint or concern may be taken when and as warranted. Furthermore, the Company shall communicate to the reporting person the final outcome of investigations triggered by the report, in accordance with procedures provided for under applicable national law.

V. Confidentiality, Privacy and Data Protection

The Company's internal procedures will safeguard the confidentiality of the identity of the Covered Person and of any third party mentioned in the communication to the maximum extent possible, as consistent with applicable laws and legal processes. It may, for instance, be permissible to disclose such identities only as absolutely required in the context of investigation, as compelled by court order in judicial proceedings, or where the complainant has intentionally revealed their identity in the context of a public disclosure. The Company also will ensure the protection of personal data, in accordance with applicable law, during the management and processing of whistleblower complaints.

Throughout the investigation process, the Company will ensure that any participants in investigations are informed of the importance of confidentiality and privacy.

VI. Zero Tolerance for Retaliation

This Policy prohibits any form of retaliation, threats of retaliation, and attempts of retaliation against Covered Persons who submit complaints in good faith or with a reasonable belief, under this Policy, to the Company or to the appropriate supervisory authority for whistleblower complaints.

Retaliation actions include but are not limited to:

- (i) Suspension, lay-off, dismissal or equivalent measures;
- (ii) Imposition of any disciplinary measure, demotion, loss of opportunity or denial of promotions and any other substantial modification of working conditions (e.g. transfer of duties, change of location of place of work, reduction in wages or change in working hours);
- (iii) Failure to convert a temporary employment contract into an indefinite

- one, if the employee had legitimate expectations that he/she would be offered an indefinite job;
- (iv) Failure to renew, or early termination of, a temporary employment contract;
 - (v) Withholding of training;
 - (vi) Harm, including those of a reputational nature, particularly in social media, or (economic) losses, coercion, intimidation, harassment or isolation;
 - (vii) Negative evaluation or references regarding work or professional performance;
 - (viii) Inclusion in black-lists or dissemination of information in a specific sector, which hinder or prevent access to employment or the contracting of works or services;
 - (ix) Denial or cancellation of a license or permit;
 - (x) Discrimination, or unfavorable or unfair treatment;
 - (xi) Threat of reprisal;
 - (xii) Early termination or cancellation of a contract; and/or.
 - (xiii) Psychiatric or medical referrals.

The Company retains the right to take disciplinary or corrective actions against employees when justified and carried out as part of the regular exercise of management powers under labor legislation, due to circumstances, facts, or accredited infractions, unrelated to the presentation of a whistleblower complaint under this Policy. For example, the following actions, when taken for legitimate business reasons, would not be considered retaliation:

- (i) Performance-based decisions, such as suspension, demotion, or dismissal, based on documented underperformance or misconduct unrelated to a whistleblower complaint;
- (ii) Reassignment of duties or changes in working conditions made for operational reasons unrelated to a whistleblower complaint; and/or
- (iii) Legitimate reductions in workforce or changes in business structure unrelated to a whistleblower complaint.

VII. External Reporting

Nothing in this Policy prohibits Covered Persons from reporting possible violations of the law or regulation to any governmental agency or entity or making other disclosures protected under the whistleblower provisions of any applicable law or regulation. While Covered Persons are encouraged to file complaints or concerns internally in accordance with this Policy, they do not need the prior authorization of the Company to make any reports or disclosures to any governmental agency or entity and are not required to notify the Company that they have made such reports or disclosures.

VIII. 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, applicable law will prevail.

IX. Enforcement

Any alleged or actual violation of this Policy (a "Violation") shall be treated as a serious matter and must be immediately reported to the Compliance Team. The Compliance Team shall investigate the facts and circumstances surrounding any and all alleged Violations. In addition, any Violation of this Policy may result in disciplinary action up to and including potential termination.

X. Administration

The Compliance Team shall have primary responsibility for the administration of this Policy, working with the appropriate members of other departments, as required. If you have any questions regarding the Policy, please do not hesitate to contact the Compliance Team at compliance@tripadvisor.com

Policy Information

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Category: 1	Version Number: 4.1
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Date Approved: 01/28/2025	Ratified Date: 02/06/25

THE COMPANY RESERVES THE RIGHT TO SUBSTITUTE OR CHANGE THIS POLICY AT ANY TIME WITH OR WITHOUT NOTICE. PLEASE PERIODICALLY REVIEW THIS POLICY FOR YOUR COMPREHENSION AND CONTINUED ADHERENCE