Code of Business Conduct and Ethics

Effective Date: April 28, 2026

Tripadvisor, Inc. (together with its subsidiaries, the "Company") has adopted this Code of Business Conduct and Ethics (this "Code") to reflect our commitment to conducting our business affairs in accordance with not only the requirements of law but also standards of ethical conduct that will maintain and foster our reputation for honest and straightforward business dealings. All directors, officers, employees, contractors, and consultants of the Company ("Covered Persons") are expected to read and understand this Code, uphold these standards in their corporate activities and take personal responsibility for compliance with this Code as well as all related policies and procedures of the Company.

I. Honest, Lawful and Ethical Conduct

In performing your duties on behalf of the Company, you should always be honest and conduct yourself in accordance with the highest ethical, professional, and legal standards. In addition, you should at all times act in keeping with your duty of loyalty to the Company and in the best interests of the Company.

Our travelers (also referred to as "users") are our most valuable asset, and it is our responsibility to make sure we continually earn the utmost trust of our users as well as our employees, suppliers and other partners, investors and other stakeholders. All communication and other interaction with our users and partners should build or reinforce trust in us through consistently honest, lawful, and ethical conduct. You should avoid any action or any communication that would wrongly exploit this highly regarded asset.

The requirement of honest, lawful, and ethical conduct is broad. This Code sets forth some basic principles and behaviors that we expect but it does not cover every issue that may arise. If you have any questions or concerns, including with regard to how this Code applies to particular issues, you should contact your manager or the Compliance Team. Managers, in particular, have a heightened responsibility to demonstrate ethical leadership and foster a culture of integrity. They are expected to lead by example, encourage open discussion of ethical issues and compliance, promote an environment where employees feel safe to speak up, respond promptly to questions and concerns, and ensure their teams understand this Code and related policies. By modeling these behaviors, leaders help to ensure that honesty, lawfulness, and ethical conduct are consistently practiced throughout the Company.

II. Commitment to Workplace and Human Rights

The Company is committed to maintaining the utmost integrity in the work environment. Consistent with this commitment, we expect you to act professionally, treat others with courtesy and fairness, and respect one another's differences.

You must comply with all local and applicable employment laws, as well as with Company policies addressing workplace conduct. The Company is committed to providing a safe and healthy, violence-free workplace, which protects you and contributes to a productive workplace. You are expected to follow all applicable health and safety rules and practices. For more information, please review the Company's Equal Employment Opportunity and Prohibition of Workplace Harassment Policy.

As an equal employment opportunity employer, the Company is a leader in recruiting, retaining, developing, and effectively managing a diverse workforce. We base hiring, promotional, and performance management decisions on

qualifications and job performance. Our policy is to treat each employee and job applicant without regard to race, religion, color, gender, national origin, ancestry, mental or physical disability, marital status, military or veteran status, citizenship status, age, sexual orientation, gender identity or expression, genetic information, medical condition, sex, sex stereotyping, pregnancy, or any other basis. Covered Persons must refrain from acts that are intended to cause, or that do cause, unlawful employment discrimination. We also accommodate qualified disabled employees and applicants, consistent with applicable laws.

The Company prohibits harassment in the workplace, including sexual harassment. Consistent with this policy, we will not tolerate harassment by any of our employees, contractors, or other third parties. Harassment includes verbal or physical conduct which threatens, offends, or belittles any individual because of his or her race, religion, color, gender, national origin, ancestry, mental or physical disability, marital status, military or veteran status, citizenship status, age, sexual orientation, gender identity or expression, genetic information, medical condition, sex, sex stereotyping, pregnancy, or any other basis. Retaliation against a Covered Person for alleging a complaint of harassment or discrimination or for participating in an investigation relating to such a complaint will also not be tolerated.

You may wish to review our employment policies on Passport or contact your PeopleOps Business Partner for a copy of its local policies.

As a global leader in the travel industry, we also believe we have an opportunity to use our platform to affect the advancement of human rights through our business operations. The Company's commitment includes prohibiting forced labor, adhering to minimum age requirements of applicable labor laws and regulations, ensuring wages, and working hours adhere to local law and industry practice, opposing human trafficking, and respecting employees' rights of freedom of peaceful assembly, association, and expression. The Company's policies and statements which are relevant to and support these principles include the following:

- Global Human Rights Policy
- Modern Slavery Statement

III. Conflicts of Interest

We have an obligation to always do what is best for the Company, our users, and our partners. When faced with a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of the Company, our users or our partners, you may be faced with a conflict of interest. We need to avoid any and all conflicts of interest, including circumstances that may reasonably present even the appearance of a conflict.

It is very important for all of us to realize that situations are constantly changing. An activity may not present a conflict of interest, at first, but as time goes on and circumstances change, it may very well become one. If after reviewing this Code you are still hesitant or unsure how to proceed, contact your manager or the Compliance Team for further review.

Below, we provide specific guidance in five areas where conflicts of interest often arise:

A. Personal Investments

You should never make significant personal investments in companies that specifically fall within the scope of

the Company's industry. Generally, investments in venture capital or other similar funds that invest in a broad cross-section of companies that may include our competitors or business partners do not create conflicts of interest. However, a conflict of interest might very well exist if you have any control over the fund's investment activity. Any personal investment which creates, or could appear to create, a conflict of interest must be reviewed by the Compliance Team.

B. Prediction Market Trading.

Trading in prediction markets, event contracts, or similar instruments (collectively, "Event Contracts") on events relating to the Company, its business, its securities, its competitors, its customers, or regulatory matters affecting the Company can create a personal financial interest that conflicts with your duties to the Company and its stakeholders. Such a conflict exists regardless of whether you are in possession of nonpublic information, and regardless of whether the trading is separately prohibited under the Company's Insider Trading Policy.

Wagering or betting related to individual securities or financial indices or instruments, as well as establishing an account with or engaging in activity on a prediction market, whether directly or by tipping others, is prohibited, whether public, private, foreign, domestic, regulated, or unregulated, where participation involves any information relating to the company, its competitors, its customers, partners, or vendors. Using company analysis, forecasts, or work product of any kind to inform prediction market trades, regardless of whether that information is technically material nonpublic information, is also prohibited.

C. Relatives, Close Friends and Co-Worker Relationships

You must, to the fullest extent, avoid engaging in existing or potential business relationships of the Company involving spouses, relatives, or close friends. For example, if you are the hiring manager for a position in which your spouse, relative, or close friend is being considered, there is an obvious and apparent conflict of interest. A relative, spouse, or close friend working at the Company, or a direct competitor of the Company does not necessarily create a conflict of interest. However, if you are directly involved in managing that business relationship then the situation would create or could appear to create conflicts of interest and must be reviewed by the Compliance Team.

D. Gifts, Entertainment and Other Business Courtesies

Accepting or giving gifts, entertainment, and other business courtesies from or to one of our competitors or partners can easily create the appearance of a conflict of interest, especially if the value of the item is significant. In addition, accepting gifts, entertainment or other courtesies may be construed as a bribe, payoff, unlawful gratuity or kickback and subject the Company and those involved to criminal penalties. Gifts can be any product, service, voucher, certificate or other similar incentive. Examples include, but are not limited to, gift certificates, rental car vouchers, hotel or lodging accommodations or airline tickets for non-business use, including class upgrades.

You should respect and value our relationship with customers, partners, vendors, suppliers. You should never solicit gifts, entertainment or other courtesies from any entity or person with whom we have a business relationship. Gifts and entertainment may only be provided by the Company and/or you for legitimate business purposes, such as maintaining cordial relations, improving the Company's image, or presenting the Company's products and services.

Employees may only accept, approve the receipt of, give or offer gifts, entertainment, and other courtesies if the giving or receiving meets the following criteria:

- The gift is consistent with accepted business practices;

- The aggregate value of the items is not excessive or unreasonable and is consistent with any local laws;
- The frequency of giving gifts to, or receiving gifts from, any one person or entity is not excessive or unreasonable;
- The gift could not be reasonably construed as payment or consideration for influencing or rewarding a particular decision or action;
- The giving or receiving such gift does not violate applicable or local law;
- The public disclosure of such gift would not embarrass the Company; and
- The gift is not securities, cash, cash equivalents or a form similar to those.

Infrequent and moderate business meals and entertainment with customers, partners, vendors, and suppliers (such as attending sporting events or celebratory meals) can be appropriate aspects of many of our business relationships, provided that they aren't excessive and don't create the appearance of impropriety. Business entertainment (including meals) must be lawful and appropriate, and within acceptable boundaries of good taste and business purpose. Business entertainment is not subject to the approval requirements as long as the customer, partner, vendor or supplier representative accompanies the employee. If the employee is not accompanied, then the approval procedures below apply.

Notwithstanding the foregoing, gifts, entertainment, and other courtesies involving potential "public officials" present particular risks and are discussed further in Section IV. Item A. Anti-Corruption/Anti-Bribery Laws below.

All gifts, entertainment and other courtesies not for a legitimate business purpose, that do not meet the criteria above, or have a value in excess of $200 must be disclosed to and approved by the applicable Vice President in your department, line-of-business, division or functional area. Vice Presidents and above must obtain the approval of their manager or the Compliance Team (if the latter, by sending an email to compliance@tripadvisor.com). If you have any questions or are unsure about a particular gift, entertainment, or other courtesy, please contact the Compliance Team.

Please note that the Internal Revenue Service and other taxing authorities may require disclosure of certain types of gifts received. You are responsible for complying with any such rules. As a result, you should consider maintaining accurate records related to the giving or accepting of gifts.

In addition, all benefits, credits and/or points accruing directly to the Company from travel and/or company-sponsored purchasing credit cards inure to the benefit of the Company and not to you.

E. External Employment, Advisory Roles, Board Seats and/or Speaking Engagements

The acceptance of additional and/or supplemental employment with any of the Company's partners, vendors, suppliers and/or competitors could create, or appear to create a conflict of interest. You should never engage in any outside business activity that may detract from your responsibilities to the Company or that could have a negative impact upon the Company. This also applies to advisory positions, consulting roles or board seats with our partners, vendors, suppliers and/or competitors. Employment, advisory positions, consulting arrangements or board seats must be approved by your manager and disclosed to your PeopleOps Business Partner.

F. Business Opportunities Found Through Work

Any business opportunity stemming from work at the Company belongs entirely to the Company. Such business opportunities may not be pursued other than directly through the Company. If you are considering entering into any one of these situations, you are creating potential for a conflict of interest. Before engaging directly or indirectly in any business opportunity or transaction that reasonably could give rise to an actual or apparent conflict of interest:

- Board members and executive officers must provide full and fair disclosure of all relevant facts and circumstances to, and receive the approval of, the Board of Directors or a committee thereof and receive the express approval from the same;

- Everyone else must provide full and fair disclosure of all relevant facts and circumstances to the Compliance Team and receive express approval from the same.

IV. Compliance with Laws, Regulations and Rules

It is our policy to be a good "corporate citizen." Complying with the law is the foundation on which our ethical standards are built. You must comply with applicable laws, regulations, rules and regulatory orders applicable in the country, state and local jurisdictions where business is conducted. You are expected to acquire appropriate knowledge of the requirements relating to your duties sufficient to enable you to recognize potential issues or violations. If you have any questions about any potential issues or violations, you should immediately contact the Compliance Team for guidance.

Following are a few examples of specific laws that present significant risks and so are worth pointing out:

A. Anti-Corruption/Anti-Bribery Laws

The Company and you must comply with the U.S. Foreign Corrupt Practices Act ("FCPA") and the U.K. Bribery Act, as well as with all applicable local laws, which prohibit the paying of bribes in order to improperly obtain, direct or retain private or public business or to secure an improper advantage. Although the exchange of gifts with partners, suppliers and vendors is a common business practice, in some cases, the exchange of gifts could be interpreted as a bribe. So, it is important that any exchange of gifts be conducted in strict adherence to this Code and in accordance with applicable laws.

In addition, you are not allowed to offer, pay, promise to pay, give or authorize anything of value:

- To any person, whether a public official or a private individual, either directly or indirectly; or

- For the purpose of influencing a public official's acts and decisions (including failures to act and decide) or to induce or reward any person's (whether a public official or private individual) improper performance of their functions or activity (improper performance is acting in breach of a reasonable expectation of trust, good faith or impartiality); or
- To assist the Company in obtaining or retaining private or public business, directing business to any person or securing an improper advantage for the Company.

Providing, or even offering, a gift or business entertainment of any value to a public official in exchange for

official action, or to any person (whether a public official or private individual) in exchange for improper performance of their functions, undoubtedly violates the FCPA and/or the U.K. Bribery Act.

The definition of "public official" is very broad and covers:

- Any elected official, officer, or employee of a government, including any judicial, legislative or administrative official and any person acting on behalf of such person,
- Any official of a political party, including union or party officials,
- Any candidate for political office,
- Any employee, officer, agent, or other representative of a state-owned or state-controlled entity, or
- Any officer or employee of a public international organization.

Keep in mind that in some countries employees of airlines, chambers of commerce, destination marketing organizations (or DMOs), travel bureaus and other travel-related entities may constitute "public officials." Always seek guidance from the Compliance Team if you have any question as to whether someone meets this definition. No offer of gifts or business entertainment to anyone that could potentially fall within this definition is permitted without first obtaining the approval of the Compliance Team.

B. Insider Trading

Federal securities laws prohibit you from trading securities if you are aware of "material non-public information" about the issuer of the securities. These laws also prohibit persons who are aware of such information from disclosing or "tipping" this information to others who may trade. Both the U.S. Securities and Exchange Commission ("SEC") and the national securities exchanges investigate, and are very effective at detecting, insider trading. For this reason, the Company has adopted the Insider Trading Policy which is available on Passport. If you have any questions concerning this policy, contact the Compliance Team.

C. Anti-Trust Laws

Many countries, including the United States, have established anti-competition laws and, although the various criteria may differ slightly by country or jurisdiction, they all have the same basic objective: "to protect the process of competition for the benefit of consumers, making sure there are strong incentives for businesses to operate efficiently, keep prices down, and keep quality up." Generally speaking, these laws prohibit: (i) any arrangements with competitors that restrain trade in any way, (ii) any abuse of intellectual property rights, and (iii) any use of market power to unfairly disadvantage competitors. Furthermore, prohibited conduct may include activities such as cooperating with competitors to boycott specific suppliers or customers, or using the Company's size or strength to gain an unfair competitive advantage in the market place. All activities that could create the appearance of wrongdoing or unfairness in any way are prohibited by the Code and may constitute a violation of these laws. If you have any questions about antitrust laws and how they apply to your specific position or relationship, please contact the Compliance Team before proceeding.

D. Criminal Finance Act 2017

The United Kingdom ("UK") approved the Criminal Finances Act 2017 that establishes that corporations may be criminally liable if they fail to take reasonable steps to prevent any member or employee, an agent, or any other person who provides services for or on behalf of the corporation that facilitate the commission of tax evasion offence.

It will not be permitted for you, or for you to instruct someone on your behalf, to: (i) engage in any form of facilitation of tax evasion (whether in the UK or abroad); (ii) aid, abet, counsel or procure the commission of tax evasion offense by another person; (iii) fail to promptly report any request or demand from any third party to facilitate the fraudulent evasion of tax, or any suspected fraudulent evasion of tax by another person; or (iv) threaten or retaliate against another individual who has refused to commit a tax evasion offense, or who has raised concerns.

The prevention, detection and reporting of tax evasion are the responsibility of all those working for or under the control of the Company. You are required to avoid any activity that might lead to, or suggest, a breach of the Criminal Finance Act 2017. If you believe or suspect that an act of facilitation of tax evasion has occurred, or may occur in the future, please contact the Compliance Team.

E. Money Laundering Laws

Money laundering is the concealment of the proceeds of a crime, typically by means of transfers involving foreign banks or legitimate businesses. The Company and you must exercise care and good judgment when handling payments, whether in connection with a customer or supplier transaction to prevent the use of our resources to launder money, fund terrorism, or commit other criminal activity.

We must ensure that we make payments for goods and services through approved and documented payment procedures. We only conduct business with customers, partners, vendors and suppliers that provide proper information so that we can determine whether the payments are appropriate.

If you observe a transaction that is suspicious or potentially indicative of money laundering activity, please contact the Compliance Team.

F. Accurate Advertising and Marketing

We comply with applicable laws and regulations that govern advertising, marketing, and promotions. We should not be deceptive or misleading in our advertising or marketing, or make known false claims about our partners' products and services, including regarding pricing.

V. Financial Reporting and Accounting

We are committed to establishing and maintaining effective internal controls, as well as best practices in accounting and financial reporting. All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect our transactions and must conform both to applicable legal requirements and to our system of internal controls. You are required to cooperate fully with internal and independent auditors during audits of the Company's books, records and operations.

You must report the following to the Compliance Team immediately:

- Significant deficiencies or material weaknesses in the design or operation of internal controls that could adversely affect Company's ability to record, process, summarize and report financial data accurately;
- Any fraud, whether or not material, involving those who have a significant role in the Company's financial reporting, disclosures or internal controls; or
- Unrecorded or "off the books" assets or liabilities.

Please refer to the Company's Global Whistleblower Policy and contact the Compliance Team with any questions.

VI. Public Communications and Media

We are committed to providing full, fair, accurate, timely and understandable disclosure in all reports and documents filed with or submitted to the SEC and in all other public communications made by the Company. In order to do that, it is our policy to disclose information concerning the Company to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all such information is communicated in a way that is reasonably designed to provide broad, non-exclusionary distribution of information to the public. All inquiries or calls from investors and financial analysts should be referred to the Investor Relations department. We have designated our Chief Executive Officer, Chief Financial Officer, and Investor Relations department as our official spokespersons for financial matters. We have designated our Public Relations department as our official spokespersons for inquiries or calls from the media or press and inquiries about marketing, technical and other related information. These persons are the only people who are authorized to communicate with the media, press, investors, or financial analysts on behalf of the Company, unless a specific exception has been made by our Chief Executive Officer or Chief Financial Officer.

Occasionally, you may be contacted by media requesting information about Company matters, including product and financial information, information regarding current or former employees, the Company's projects, and/or other workplace issues. Unless you are expressly authorized by our Public Relations department and have received media training from the Company, you should always decline to comment to the media and immediately contact the Public Relations team. This also applies if you are asked to speak on an industry panel or as an industry spokesperson. Even if you don't intend to speak on behalf of the Company, your title or position might lead the media or your audience to think otherwise. All such requests should be handled like all other media requests, meaning that you should get the Public Relations team's permission before participating. You also may not provide any information to the media off the record, for background, confidentially or secretly.

You must exercise sound judgment when posting Company-related comments on the internet, including blogs, social media, and public facing network sites such as Facebook and LinkedIn. In general, you should not blog or post about Company matters unless you are an official spokesperson. If authorized, comments should be in good taste and not include vulgar, demeaning, or embarrassing content. Posting must not disclose proprietary or confidential information such as Company performance, business plans, etc.

Because we respect our employees' right to privacy, we do not usually take an interest in what anyone does outside of work, unless it impairs their work performance or threatens our reputation or legitimate business interests. You should be particularly mindful when participating in online conversations that reference the Company or are posted using Company equipment or through our network. Be aware that taking public positions online that are counter to the Company's interests may cause conflict and can have disciplinary repercussions. In accordance with applicable law, we may monitor social media and other internet sites to ensure that posting do not reflect badly upon the Company or damage our reputation.

Please refer to the Social Media Policy and/or External Communications Policy for further detail and if you have any questions on this topic.

VII. Confidentiality

You have signed a confidentiality agreement. But please remember that our continuing leadership in travel, in large part, relies on our ability to out innovate our competitors and surprise our community with terrific experiences. Therefore, confidentiality about our projects, our products, and any other private information is of utmost

importance. Confidential information includes but is not limited to financial, intellectual property, employee, partner, customer, and user information.

You are obligated to protect the Company's confidential and nonpublic information at all times, including outside of the workplace and during nonbusiness hours, and even after your professional relationship ends. You cannot disclose nonpublic information about the Company to anyone outside of the Company, including to family and friends, except when disclosure is necessary, and part of a job function and the receiving party is subject to a confidentiality agreement. Similarly, you are not permitted to disclose confidential information about third parties to whom the Company owes a confidentiality obligation. Be aware of your surroundings when working outside of the office or at home to prevent inadvertent leaks of confidential information. Do not have conversations about the Company's confidential information in public areas such as elevators, trains, or airplanes, where such conversations can be overheard and when working from home, take care not to reveal sensitive or confidential information in front of anyone. The Company recognizes that many Covered Persons work in remote or hybrid arrangements. You must take appropriate measures to protect confidential information, including ensuring private conversations cannot be overheard by household members or others, securing physical documents, and maintaining appropriate screen privacy.

Former Covered Persons are expected to adhere to any nondisclosure obligations that they may have with prior employers, and any information subject to such an obligation may not be disclosed to the Company. We retain and engage our work force based on skills and knowledge and not for any confidential information that they may have had access to or possessed prior to their engagement with the Company. We expect that our staff do not bring with them, and will not disclose to the Company, any information from a former professional engagement. You may sometimes need to disclose our confidential information to potential customers or business partners. In that case, you should first contact the Legal Department to ensure that an appropriate written nondisclosure agreement is signed by all necessary parties before any such disclosure occurs. You should never sign a third party's nondisclosure agreement before the Legal Department approves the agreement.

Frequently, nondisclosure agreements executed by the Company are mutual in nature. This means you must protect the confidential information of our partners, suppliers, contractors, competitors, and customers that is exchanged under such an agreement in the same manner as you are required to protect our confidential information. If you have access to confidential information about any of our partners, suppliers, contractors, competitors, and customers as part of your job, you must check with the Legal Department and use it solely for legitimate business purposes and as permitted by any applicable Law, agreement, and this Code.

VIII. Privacy and Data Security

As part of our business, we may, from time to time, collect and retain personal and confidential data about our users, customers, employees, contractors as well as our business partners and their users, customers and employees and other key stakeholders. We are provided with this information with an expectation that we will safeguard it from misuse and/or unauthorized processing. Data privacy is an important and evolving right in many countries and industries. Data owners are requiring greater data protection, and, in turn, governments and courts are increasing the development and enforcement of data privacy laws. As part of our commitment to data privacy, and in order to comply with data privacy laws, you are required to follow our policies, instructions, and procedures regarding data security and protection to minimize unlawful use, collection, retention, loss or destruction of, or damage to, personal data.

In conducting our business, the Company increasingly utilizes artificial intelligence ("AI") and machine learning technologies that may process various types of data, including user, customer, and business information. You must ensure that any use of AI and machine learning technologies complies with our AI Use Policy. The Company supplies tools and equipment needed for you to conduct your role effectively; such tools and equipment must be used in

compliance with our Information Security Policy and Electronic Communications and Online Systems Acceptable Use Policy. Covered Persons are responsible for maintaining the physical security of devices or equipment received from the Company including, but not limited to, computers and mobile devices. Devices should only be accessed by the Company's intended users. Covered Persons are expected to adhere to security policies and any incidents of security breaches (such as lost equipment or compromised passwords) should be reported immediately in compliance with the Company's Information Security Policy.

Should you have any questions on this topic, please consult our Information Security Policy, Data Retention Policy and Privacy and Cookie Statements. If you believe that personal data has been used, lost or disclosed without authorization, you should immediately alert your manager and/or the Compliance Team.

IX. Protection for Reporting Violations

It is prohibited, and is a violation of this Code, for you or the Company to retaliate in any way against anyone who has reported to the Company in good faith information indicating that a violation of this Code may have occurred or may be about to occur. Prohibited forms of retaliation include adverse employment actions (such as termination, suspension and demotion), the creation of a hostile work environment and any other type of reprisal for the good faith reporting of a possible violation of this Code. Any individual who believes that they have been subjected to retaliation should promptly report such retaliation using the procedures outlined in the Global Whistleblower Policy.

X. Waiver

Any waiver of this Code for executive officers or directors of the Company may be made only by the Board of Directors or a properly authorized committee of the Board and will be promptly disclosed as required by applicable laws, rules, and regulations.

XI. Modification and Interpretation

The Company reserves the right to modify, discontinue or replace this Code or any terms of the Code at any time, with or without notice. In the event of conflict between this Code and applicable law, applicable law will prevail; however, where legally permissible, the Code shall be interpreted to provide the Company with the greatest flexibility possible in managing corporate equipment and systems.

XII. Enforcement

Any alleged or actual violation of this Code will 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, after which the Chief Compliance Officer, in consultation with other members of the Compliance Committee as appropriate, will determine whether a given violation has occurred and take appropriate disciplinary action.

XIII. Identifying and Raising Concerns

We all have a responsibility to help maintain our values and protect our reputation so that our actions don't compromise our future success. If you observe behavior that concerns you, or that may represent a violation of our Code, a corporate policy or a law or regulation, you have several options for raising issues and concerns. You can contact any of the following:

• Your manager;

• Your HR Business Partner;

• The Compliance Team

We are here to help provide guidance and to address any issues that may arise.

In addition, if you wish to submit an anonymous complaint or concern you may communicate with the Company as follows:

by mail addressed to: Tripadvisor, Inc., 400 1st Avenue, Needham, MA 02494, Attn: Chief Compliance Officer or General Counsel;
by telephone at: 866-375-1123;
online at http://www.openboard.info/trip;
by email to tripadvisor@openboard.info

XIV. Administration

The Compliance Committee has primary responsibility for the administration of this Code, working with the appropriate members of other departments. This Code will 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 would like any further information on this Code, please contact the Compliance Team at compliance@tripadvisor.com.