UK AND AUSTRALIA JOINT MODERN SLAVERY STATEMENT

This Statement is made pursuant to Section 54 of the United Kingdom’s Modern Slavery Act 2015 (hereafter the “UK MSA”) and Section 14 of the Australian Modern Slavery Act 2018 (hereafter the “Australian MSA”). It sets out the steps Tripadvisor LLC, its subsidiaries and affiliates, including but not limited to Tripadvisor Limited and Viator Inc. (collectively, “Tripadvisor”), has taken and will continue to take to prevent acts of modern slavery and human trafficking from occurring in its business and supply chain.

1. Our Commitment

At Tripadvisor, we are committed to operating in a responsible and ethical manner. We recognise that slavery, servitude, forced and compulsory labour, and human trafficking (also known as “modern slavery”) are serious crimes and global human rights issues. We take seriously our responsibility to comply with the UK MSA and Australian MSA and to assist in preventing and combating modern slavery.

This Statement includes a description of our efforts to identify and mitigate the risk of modern slavery in our business and supply chains, and the policies and processes we have in place to prevent and report non-compliance.

2. Our Structure and Operations

Tripadvisor is a leading online travel company, and our mission is to help people around the world plan, book and experience the perfect trip. Tripadvisor operates a global travel guidance platform that connects the world’s largest audience of prospective travellers with travel partners through rich content, price comparison tools, and online reservation and related services for destinations, accommodations, travel activities and experiences, and restaurants. For more information about Tripadvisor, please visit our corporate website at https://tripadvisor.mediaroom.com/us-about-us; to learn more about our operations and financial information as well as our Investors page at https://ir.tripadvisor.com/.

3. Assessment of our Modern Slavery Risk

Modern slavery is an umbrella term that covers the illegal exploitation of people for commercial or personal gain. This includes, but is not limited to, forced labour, prison labour, indentured labour, debt servitude, and human trafficking. We are committed to identifying and addressing modern slavery risks in both our own operations and our supply chains.

We consider the risks of modern slavery and human trafficking occurring in our direct business operations to be relatively low, given that our workforce is made up of largely professionally qualified or skilled personnel. We do acknowledge, however, that potential risks could be present in our supply chains. While Tripadvisor does not directly operate any of its travel activities, experiences, restaurants, hotels or accommodations, we are conscious of the supply chain issues that face the travel industry, and are committed to continually identifying new means of identifying and mitigating these risks.

4. Addressing Modern Slavery Risks
4.1 Policies

Tripadvisor is committed to acting ethically and with integrity in all of its business relationships. We have a number of policies and processes that form part of our approach to ethics, human rights and modern slavery. These include our Code of Business Conduct and Ethics (the “Code”) that requires all directors, officers, employees, contractors and consultants to uphold high standards of honest, lawful and ethical conduct. The Code requires such persons to report any violations confidentially to our Compliance team.

Through both the Code and our Whistleblower Policy, we prohibit any retaliation against those who make good-faith reports of concerns about the lawfulness of any of our business practices, or breaches of the Code. In addition, to ensure that our employees are not subject to undue influence and are treated fairly and with respect, Tripadvisor has human resource and compliance policies and procedures, as well as recruitment process and training, in place across all of our operations.

One of Tripadvisor’s corporate values is to respect fundamental human rights. We are committed to identifying and addressing human rights risks and believe that we can use our platform to effect positive change in people’s lives.

For many years we outlined our commitment to human rights in the Code. In 2021 we took the step to codify our commitments in a Global Human Rights Policy (the “Policy”, available at https://tripadvisor.mediaroom.com/us-about-us). The Policy applies to all directors, officers, employees, consultants and contractors within our company. Those covered are all expected to read the Policy, uphold the standards it sets out, and are encouraged to promptly raise any concerns regarding human rights infringement. Tripadvisor is also dedicated to working with suppliers who share our commitment to ethical standards of business, and we are committed to identifying ways of promoting these principles with our partners.

4.2 Employee Training

During new hire orientation and training, all recently hired employees receive a copy of the Code and receive training on the Code as well as other human resource policies and procedures. Each year, our employees are required to certify that they have reviewed the Code and other key policies. In addition, a subset of our contractor and consultant population are also required to complete similar training.

4.3 Industry Initiatives

Modern slavery is complex and we believe strongly that working together with others to identify risks and best practices will be the most effective way to bring change in this area. In line with this, we are part of a number of industry forums and working groups and have signed the Private Sector Commitment to the United Nations World Tourism Organization (“UNWTO”) Global Code of Ethics for Tourism. This code of ethics is a comprehensive set of principles designed to guide key-players in tourism development.

4.4 Travel Suppliers and Third Party Vendors

Though Tripadvisor does not operate any of the travel activities, experiences, restaurants, hotels or accommodations described on our platform, we are attentive to the existence of supply chain issues within the travel industry in which we operate. As such, we ask our business partners, vendors, suppliers
and clients to confirm in our agreements with them that they comply with all applicable laws and regulations, which include those laws and regulations that relate to modern slavery. More recently we have started a process of reviewing our supplier due diligence processes and assessing where there is a need for increased tooling to help identify modern slavery and other human rights risks.

5. Assessing Effectiveness

During the last reporting year, Tripadvisor has focused on evaluating and building out our due diligence process for suppliers and third party vendors to enable improved identification and mitigation of risks. This involved analysing the tooling used to vet third parties, and assess them for compliance with our polices, and addressing gaps in our due diligence questionnaire. We will continue to assess our processes and seek to address any deficiencies and enhance our ability to identify and mitigate modern slavery risks.

6. Consultation

As set out in the opening paragraph, this Statement has been prepared on behalf of Tripadvisor LLC along with its subsidiaries and affiliates, with specific input garnered from all the relevant reporting entities (Tripadvisor LLC, Tripadvisor Limited, and Viator, Inc.). We have ensured to communicate with each reporting entity the commitments made, noting that they are subject to the same policies set out in this Statement.

7. Looking Ahead

We will continue to further improve our practices and processes to help combat modern slavery.

This Statement has been approved by Tripadvisor’s Compliance Committee, the Board of Directors and/or Board of Managers, as appropriate, of each of the entities listed below.

TRIPADVISOR LLC
TRIPADVISOR LIMITED
VIATOR, INC.

[Signature]
1 November 2022
Linda C. Frazier
Director