

**Protection and Reward Measures for Whistle-blower  
and Witness of Trip.Com Group**

## **Chapter1 General Rules**

### **Article 1 Objective**

Adhering to the principle of “customer-oriented operation”, Trip.com Group (hereinafter referred to as “Trip.com”) establishes an all-win partnership system to jointly create maximum value, with the mechanism of seamless cooperation among the teams and the concept of meticulous dedication and trustful cooperation. Trip.com is committed to creating a corporate culture of integrity, diligence, and dedication for its employees and to maintaining a high standard of business ethics in the industry. In order to strengthen the protection of whistle-blowers and witnesses, to encourage the company's employees, suppliers, partners, and other stakeholders to actively report corruption, duty misappropriation, and other violating behaviors that infringe on the Company's interests, and to consolidate the development of the Company's honesty and integrity culture system, the Measures is hereby formulated.

### **Article 2 Scope of whistle-blowing**

For the purpose of the Measures, whistle-blowing refers to that all employees, directors and suppliers of the Trip.com Group and all of its subsidiaries and branches, or any other stakeholder may, through the whistle-blowing channels set forth in Article 3 of Chapter 2 of the Measures, report any possible improper matters regarding the Company, such as disclosure and whistle-blowing violations of the Administrative Regulations on Anti-Fraud and Anti-Corruption of Trip.com Group by the Company, its employees, directors, and Senior Management.

The scope of whistle-blowing includes, but is not limited to, the following circumstances:

- (1) Taking advantage of his/her position to seek improper benefits for himself/herself, stakeholders, or others;
- (2) Taking advantage of his/her position to receive kickbacks, service charges, and other benefits in financial dealings for personal or collective benefits;
- (3) Misrepresentation or willful omission and misrepresentation of a transaction or other matters causing the Company to make a payment for a false transaction or matter;
- (4) Improper receipt and appropriation of gifts and gratuities;
- (5) Taking and soliciting bribes;
- (6) Corruption, embezzlement, and misappropriation of company assets;
- (7) Unauthorized, profit-seeking activities in the name of the company or malpractice that harms the company's interests;
- (8) Conflict of interest not reported;
- (9) Other fraudulent behavior.

## **Chapter 2 Whistle-blowing Channels and Protection for Witnesses and Whistle-blowers**

### **Article 3 Whistle-blowing Channels**

The Audit Department is the executive body authorized by Trip.com Group to handle and investigate employee business ethics, corruption, and malpractice, reporting and holding accountable to the Audit Committee of the Group's Board of Directors to fully guarantee the independence and objectivity of whistle-blowing acceptance and investigation. The Audit Department shall prioritize the confidentiality of whistle-blowing and strictly abide by the Protection and Reward Measures for Whistle-blower and Witness. It must be kept strictly confidential in the process of acceptance, registration, storage, and investigation to prevent leakage and loss. The Audit Department shall designate one person in charge of the Company's hotline and e-mail for whistle-blowing. Other individuals and departments are not authorized to contact.

The Company will keep the identity and personal information of the whistle-blower strictly confidential and will never tolerate any form of retaliation against the whistle-blower or persons who refuse to be involved in violations of this policy. The Company ensures that whistle-blowers, as well as investigators, will not be subject to retaliation or any form of discrimination, antagonism, or other adverse effects as a result of their whistle-blowing behavior.

Whistle-blowers (including all employees and partners of the Company) can report to the Audit Department of the Company either in real name or anonymously through the following channels.

Contact details:

Hotline for whistle-blowing: 8621-54261440

E-mail for whistle-blowing: jubao@trip.com

Address: The Audit Department of Trip.com Group, No. 968 Jinzhong Road, Changning District, Shanghai Municipality

E-mail for audit advisory: shenji@trip.com

Each employee is obliged to report the violation of this regulation. Once the relevant behavior of others is found, it shall be reported to the Company's E-mail or hotline for whistle-blowing in a timely manner. If it has been verified to be true, the whistle-blower will be granted a cash reward of RMB 1,000 to 2,000 by the violator's department. For any whistle-blower with outstanding contributions, the cash reward can be up to RMB 5,000 to 10,000.

### **Article 4 Protection for Whistle-blowers and Witnesses**

The Company will prioritize the confidentiality of whistle-blowing and investigating. It will keep the personal information of the whistle-blower and witness as well as all data provided strictly confidential and will never tolerate any form of retaliation against the whistle-blower or persons who refuse to be involved in violations of this policy. The Company ensures that whistle-blowers, as well as investigators, will not be subject to retaliation or any form of discrimination, antagonism, or other adverse effects as a result of their whistle-blowing behavior.

If the whistleblowers or witnesses suffered any form, any degree of retaliation, they can feed

back to the Company's Audit Department. The Company will take appropriate measures to protect the whistleblowers and witnesses.

#### **Article 5 Rewards for Whistle-blowers and Witnesses**

The Company encourages anyone with information to actively report in their real names to reflect the corruption in a trustful and objective manner. It will grant corresponding rewards to the whistle-blower and witness based on the final investigation results. In principle, the rewards are limited to the whistle-blowers who have reported in real names and the witnesses who have testified truthfully.

In accordance with the Compliance Fund Reward Scheme of Trip.com, the Company has established an internal control and compliance fund of RMB 1 million, which is mainly for rewarding individuals/teams who have made outstanding contributions to anti-fraud investigation, identification and prevention of material loopholes in the Company, internal control and compliance development, and other special projects.

### **Chapter 3 Bylaws**

**Article 6** The Company's Audit Department or the ESG Committee shall review the policy at appropriate times to ensure its effectiveness. If necessary, please make any revisions after discussion.