

# **Trip.com Group Supplier Code of Conduct**

## **Chapter 1 General Provisions**

### Article 1 Purpose

To further promote sustainable development in Trip.com Group's (hereinafter referred to as "we" or "the Group") supply chain management, regulate supplier behavior, clarify the supplier code of conduct, and elevate standards of integrity and sustainability among our suppliers, we have formulated this code based on the relevant laws and regulations of the countries and regions in which we operate, as well as the Group's own policies and rules. This code applies to all suppliers, including direct suppliers such as hotels and travel agencies, and includes suppliers that provide industry-related services such as video production, offline exhibitions, and marketing communications.

### Article 2 Scope of Application

This code applies to all suppliers providing products or services to Trip.com Group and our subsidiaries. Subsidiaries of Trip.com Group should implement this code for their suppliers and may develop additional implementation details based on their specific circumstances to advocate and regulate supplier behavior.

## **Chapter 2 Supplier Code of Conduct**

Article 3 Trip.com Group advocates that all suppliers conduct their business in an ethical manner. Suppliers must comply with all applicable laws and regulations, the requirements of the Trip.com Group Supplier Code of Conduct, contractual obligations to the Group, and the following main principles that suppliers should follow in their business activities with the Group:

- (1) Human rights: Trip.com Group suppliers shall respect all internationally recognized human rights and refrain from engaging in any activities that violate human rights, especially the rights of vulnerable individuals and groups (such as women, children, and international workers).
- (2) Fair labor conditions: Suppliers shall ensure fair labor conditions. Suppliers shall avoid employment discrimination based on gender, age, race, nationality, religion, disability, union membership, political affiliation, or sexual orientation. Any form of abuse and harassment, including mental abuse, sexual harassment, or gender discrimination manifested through

inappropriate gestures, language, and physical contact, is prohibited. Suppliers shall respect employees' rights to free association and collective bargaining. Suppliers must not tolerate or use child labor at any stage of commercial activity even if this complies with all applicable local laws and regulations. The use of any form of forced labor is prohibited, including but not limited to involuntary prison labor, slavery, and human trafficking victims. All employees shall be allowed to resign freely with reasonable notice. Suppliers shall comply with local minimum wage laws and provide fair and reasonable remuneration above the statutory minimum wage.

(3) Environmental, health, safety, and quality management: Suppliers shall conduct their business in a sustainable manner, minimizing the environmental impact of their operations. They must strictly adhere to local laws and industry standards, providing a safe, healthy, environmentally friendly, and comfortable workplace for all employees. Suppliers should establish management systems based on environmental management, occupational health and safety management, and quality management systems, regularly inspecting and reviewing to ensure effective operation. Suppliers should reduce waste, emissions, and wastewater discharge, use energy and resources efficiently, and use sustainable energy where possible to mitigate the environmental and personal impact of their production and operations. Suppliers should avoid operating in globally or nationally biodiversity-sensitive areas and protect biodiversity. They should enhance energy and resource efficiency, increase the use of sustainable energy, reduce greenhouse gas emissions, and minimize their negative impacts on climate change, water scarcity, and other issues.

(4) Business ethics: Suppliers should conduct their business in an ethical manner. They should avoid any form of corruption and bribery, ensuring that all payments, gifts, or other promises made to customers (including Trip.com Group employees) and any other related parties comply with local anti-bribery regulations. Suppliers should proactively disclose any potential conflicts of interest as a supplier to the Group, including disclosing any financial interests that Trip.com Group employees may have in the supplier's business activities. Suppliers should protect all confidential information provided by the Group and its business partners, respect others' intellectual property rights, including Trip.com Group's intellectual property, and comply with international trade and export control regulations.

(5) Operational safety: Suppliers should conduct their business safely. They should take reasonable measures to reduce security risks to Trip.com Group arising from terrorism, crime,

epidemics, and natural disasters. When accessing Trip.com Group's business sites or working on-site, suppliers should comply with Trip.com Group's security policies and report any security issues through appropriate Trip.com Group channels.

(6) Sustainability in business operations: Suppliers should conduct their business sustainably, including but not limited to actively managing issues related to conflict minerals and animal welfare (where applicable). Suppliers should advocate for the humane treatment of animals and actively promote animal welfare policies, ensuring environments free from pain, brutality, abuse, and neglect, and complying with applicable local laws and industry standards.

(7) Fair competition, antitrust laws, and intellectual property: Suppliers should act in accordance with national and international competition laws, avoiding activities such as price-fixing, market allocation, customer division, and bid rigging. They should respect others' intellectual property rights.

(8) Personal information and privacy: Suppliers shall process personal information confidentially and responsibly, respecting user data security and privacy, ensuring that personal information is effectively protected and only used for lawful purposes. Suppliers shall comply with privacy and information security laws and regulations when collecting, storing, processing, transmitting, or sharing personal information.

(9) Supplier procurement: Suppliers should procure goods and services responsibly. They should require their tier-one suppliers who provide goods or services directly or indirectly to Trip.com Group to adhere to standards similar to those in the "Trip.com Group Supplier Code of Conduct."

(10) Inspections and corrective actions: Suppliers should maintain all relevant records to demonstrate compliance with the "Trip.com Group Supplier Code of Conduct," the "Trip.com Group Procurement Management Policy", and the "Trip.com Group Anti-Fraud and Anti-Corruption Management Rules," and provide necessary documentation upon Trip.com Group's request. The Group reserves the right to audit suppliers' businesses and facilities, either independently or through a third party, at its own expense with reasonable notice. If Trip.com Group's audit reveals non-compliance with the "Trip.com Group Supplier Code of Conduct," suppliers should promptly take corrective actions as advised by Trip.com Group. Failure to take corrective actions or failure to meet the performance, integrity, or other requirements of the "Trip.com Group Supplier Code of Conduct" after corrective actions may result in penalties,

including but not limited to termination of cooperation, suspension, or blacklisting for three years or permanently based on the supplier's actual cooperation/performance.

### **Chapter 3 Supplementary Provisions**

The Supplier Code of Conduct implemented by the Group is managed, supervised, and reviewed by the Trip.com Group Information Security Committee, which will periodically review and revise it as necessary. If suppliers or their employees believe that the "Trip.com Group Supplier Code of Conduct" has not been followed or enforced in their business relationship with the Group, they are encouraged to provide suggestions and opinions through Trip.com Group's complaint channels.

The Group will ensure the confidentiality of the complainant's information.

The Group offers the following compliance reporting channels:

Reporting hotline: 8621-54261440

Reporting email: jubao@trip.com

Reporting address: Audit Department, Trip.com Group, 968 Jinzhong Road, Changning District, Shanghai

Audit consultation email: shenji@trip.com