

Trip.com Group Business Ethics Guidelines

Chapter 1 General Provisions

Section 1 Purpose and Requirements

Article 1 The purpose of the Trip.com Group Business Ethics Guidelines (hereinafter referred to as "these Guidelines") is to establish a robust system of business ethics within the Group. These Guidelines aim to disseminate core corporate values, promote corporate compliance and ethical integrity, enhance the Group's legal governance and business ethics management capabilities, and maintain the good reputation and brand value of Trip.com Group (hereinafter referred to as "the Group" or "we"), supporting us to become a leading global travel enterprise.

Article 2 The business management and professional conduct of Trip.com Group and all its employees must comply with local laws, regulations, and Trip.com Group's internal policies. Furthermore, they shall adhere to industry-recognized and widely observed professional ethics and codes of conduct.

Section 2 Scope of Application

Article 3 These Guidelines apply to all employees of Trip.com Group (including management, the Board of Directors, full-time employees, part-time employees, and interns). Subsidiaries of the Group may create and enforce management policies based on their own governance needs.

Section 3 Basis of Formulation

Article 4 The basis for formulating these Guidelines includes laws and regulations of the countries where we operate, the Group's management policies, and industry-recognized codes of conduct and ethical standards. These include but are not limited to: the Criminal Law of the People's Republic of China, the Company Law of the People's Republic of China, the Anti-monopoly Law of the People's Republic of China, the Law of the People's Republic of China Against Unfair Competition, the Cybersecurity Law of the People's Republic of China, the Guidelines on Compliance Management of Enterprises' Overseas Operations, the United Nations Convention Against Corruption, the Council of Europe Criminal Law Convention on Corruption, the Council of Europe Civil Law Convention on Corruption, and other relevant laws, regulations, and rules. The Group's management policies and documents that these Guidelines are based on include, but are not limited to: the "Trip.com Group Employee Handbook," the "Trip.com Group Anti-Fraud

and Anti-Corruption Management Rules," and the "Trip.com Group Management Rules on Conflict of Interest Disclosure for Important Roles."

Article 5 If these Guidelines conflict with local laws, regulations, business practices, or commercial culture during the Group's global operations, the local laws and regulations shall prevail.

Section 4 Management System

Article 6 The Group's Audit Committee is the highest authority for overseeing business ethics. This committee, directly led by the Board of Directors, is responsible for reviewing the comprehensive implementation of these Guidelines within the Group, creating favorable conditions for all employees to comply with these Guidelines, and imposing corresponding penalties on individuals who violate these Guidelines. The Audit Committee has established a Business Ethics Management Working Group, directly overseen by the Group's non-executive directors Neil Shen, JP Gan, and Gabriel Li, responsible for the construction, promotion, and supervision of business ethics norms.

Article 7 The violation reporting and supervision mechanism ensures that employees, partners, and suppliers can report and complain about illegal and non-compliant behavior. The violation reporting and supervision mechanism includes the following aspects:

- (1) Establish a hotline for reporting and complaints;
- (2) Encourage real-name and anonymous reporting;
- (3) Protect whistleblowers and strictly prohibit retaliation against them;
- (4) Conduct objective and rigorous investigations of complaints and reports.

Article 8 All employees of the Group must comply with these Guidelines. Any violations of corporate ethics and compliance obligations by employees are their own actions and do not reflect the Group's stance. The individuals involved shall bear the corresponding legal liabilities. The Group shall rectify confirmed violations based on the investigation and impose corresponding penalties on the violators according to the employee handbook, punishment policies, and severity of the violations. Penalties include but are not limited to verbal warnings, written warnings, severe warnings, and termination of employment contracts.

Article 9 The performance appraisal mechanism for ethics management. The Group has

established a performance appraisal mechanism for ethics management, incorporating the effectiveness of ethics management into overall performance appraisals. Additionally, a comprehensive mechanism for ethical culture construction has been established. It promotes the universal adherence of all employees to the concepts of lawful and compliant operations, moral standards, and value orientations.

Chapter 2 Corporate Ethics and Compliance Obligations

Section 1 Legal Employment and Labor Safety Obligations

Article 10 Employees are our valuable assets. The Group complies with labor laws and regulations of the countries and regions where we operate, establishes and improves our labor employment system, and respects and protects employees' legal rights and interests. The Group ensures employees' rights to fair wages, rest and vacation, labor safety and health protection, social insurance, and vocational skills training.

Article 11 The Group creates a healthy and safe working environment. We strictly enforce occupational safety and health regulations and standards of the host country and region, provide occupational safety and health education to employees, prevent workplace accidents, and reduce occupational hazards.

Article 12 The Group is committed to creating a fair and equitable working environment. The Group provides equal opportunities for employees and job seekers, including in employment, promotion, rewards, and training. The Group prohibits any discrimination against employees based on age, race, nationality, ethnicity, culture, religion, marital status, sexual orientation, and other factors. The Group protects employees from sexual harassment, threats, and intimidation at work and will take serious action against individuals exhibiting such behavior.

Article 13 The Group respects and protects employees' personal privacy. We collect and maintain personal information based on business needs or legal requirements and retain and process employees' personal information according to relevant regulations.

Section 2 Anti-Monopoly Obligations

Article 14 The Group adheres to the principle of fair competition in our business activities,

complies with antitrust laws and regulations of various countries, engages in healthy competition within the legal framework, and consciously avoids monopolistic behavior. In mergers and acquisitions of other business entities or their equity assets, the Group strictly abides by the relevant national antitrust laws and complies with legal standards for market concentration.

Section 3 Anti-Unfair Competition Obligations

Article 15 The Group eliminates any form of unfair competition, avoids harming the competitive advantages of other operators, and consciously maintains fair market order in global competition, adhering to international laws and regulations against unfair competition.

Section 4 Anti-Corruption and Anti-Bribery Obligations

Article 16 The Group prohibits any form of bribery and corruption. We prohibit offering, promising, or giving financial or other benefits to state officials, social groups, or Group employees.

Section 5 Suppliers' Business Ethics Obligations

Article 17 The Group closely monitors the credit status of business partners and conducts due diligence, including but not limited to: ensuring that the business partners' information is complete and accurate, and reserving the right to require business partners to cooperate with inspections and audits.

Article 18 Trip.com Group actively practices these Guidelines and ensures that suppliers respect and understand our business ethics management standards. We include business ethics and compliance clauses in contracts and reserve the right to pursue liability for breach of related terms and agreements. We also outline the methods and content for reporting violations in the contracts.

Section 6 Social Responsibility Obligations

Article 19 The Group always emphasizes giving back to society as our business develops. Specific actions include but are not limited to developing and supporting charitable causes, sponsorships, and donations.

Chapter 3 Employee Code of Ethics

Section 1 Duty of Loyalty

Article 20 Employees of the Group must fulfill their duty of loyalty to the Group and refrain from any actions that harm the Group's reputation and interests. Employees must not use their powers or Group resources for personal gain. They shall avoid conflicts of interest and comply with the Group's conflict of interest management policies. Employees shall be liable for any losses caused to the Group.

Section 2 Duty to Protect Group Assets and Intellectual Property

Article 21 The Group's assets include both tangible and intangible assets. Tangible assets include all production elements such as funds, resources, products, and equipment. Intangible assets include patents, trademarks, copyrights, trade secrets, and reputation.

Article 22 Employees shall identify and protect the Group's intellectual property. During their employment with the Group, any inventions, creations, computer software, or technology developed using the Group's assets and technical resources belong to the Group. The Group respects and protects others' intellectual property rights. Employees must not use, copy, disseminate, or alter third-party materials protected by intellectual property rights without the owner's permission while conducting business.

Section 3 Confidentiality Obligations

Article 23 The Group's trade secrets include all undisclosed information, including but not limited to business information, personnel information, financial data, customer information, contract documents, management documents, correspondence, and meeting minutes. Employees must not disclose such information to anyone outside the Group or to unrelated personnel within the Group.

Article 24 Upon separation, employees (including termination of labor contract for formal employees, termination of part-time work for part-time employees, and termination of internship for interns) must return all confidential documents, refrain from making copies or backups, and must not take these documents to another company. The confidentiality obligation of all personnel is permanently valid, except as otherwise provided by law.

Article 25 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

Article 26 These Guidelines, effective from the date of issuance, are approved by the Compliance
Committee and shall be interpreted and revised by the Human Resources Center.