

**Administrative Regulations on Anti-Fraud and Anti-  
Corruption of Trip.com Group**

## **Chapter 1 General Rules and Definitions**

### **Article 1 Objective**

In order to raise employees' awareness of professional ethics, advocate honesty and self-discipline, promote duty performance with integrity, enhance the internal control and external regulatory requirements of Trip.com Group (hereinafter referred to as “Trip.com” or the “Company”), guide employees to work in a manner that is consistent with business ethics and standards, and prevent and eliminate fraud to create a fair and sound environment for development, the Regulations is hereby formulated.

### **Article 2 Applicable scope**

The Administrative Regulations on Anti-Fraud and Anti-Corruption of Trip.com Group (hereinafter referred to as the “Regulations”) is applicable to all employees, directors, and Senior Management of Trip.com and all of its subsidiaries and branches. The Company encourages all external partners and other stakeholders with whom the Company has business relationships to work together with the Company to boost professional ethics and behavior with integrity, self-discipline, and diligence.

### **Article 3 Responsibility**

Employees are expected to act with integrity and business ethics and to adhere to the laws and their occupational rules in all circumstances. Preventing and combating fraud and corruption is the responsibility of each employee of the Company.

### **Article 4. Definitions**

1. Fraud in the Regulations refers to the negligence of duty and malpractice in duty performance or in the exercise of authority, or taking advantage of their positions to abuse power for personal gain, and the violation of internal rules and regulations that harm the company's interests, including:

(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 harm

the company's interests;

- (8) Conflict of interest not reported;
- (9) Other fraudulent behavior.

2. Improper benefits in the Regulations refer to all material and non-material benefits that satisfy the needs and desires obtained through various types of fraud.

- (1) Material benefits: refer to cash, stored value cards, prepaid cards, in-kind goods, securities, or property given in the form of reimbursement.
- (2) Non-material benefits: refer to spiritual and other improper benefits that satisfy people's needs and desires but are difficult to measure directly in terms of economic or monetary value, such as privileges, concessions, facilities, and other benefits in addition to material benefits.

3. Taking bribes in the Regulations refers to the behavior of taking advantage of his/her position to accept gifts from suppliers and partners to obtain improper benefits for himself/herself.

- (1) Accepting or soliciting property, kickbacks, rebates, product launch fees, reward for go-between, equity participation, or other forms of bribery from the partners;
- (2) Purchasing items from suppliers or partners at prices significantly lower than the market price, or selling items to suppliers or partners at prices significantly higher than the market price;
- (3) Enabling specific partners to receive special treatment or requesting partners to grant special treatment to themselves, such as asking for free housing and product price discounts;
- (4) Inviting the partners to a private banquet on the grounds of marriage, birthday celebration, housewarming, and so on;
- (5) Colluding with outsiders to pay at low prices but obtain high-price invoices for reimbursement in the Company;
- (6) Taking advantage of the Company's rebate activities to help partners or himself/herself to obtain economic benefits.
- (7) Other behavior of taking bribes.

## **Chapter 2 Prevention of Fraud**

### **Article 5. Basic principles**

All employees will undergo anti-corruption and anti-fraud training upon joining the Company and will complete the assessment related to the anti-corruption and anti-fraud training organized by the Company every year.

The Company requires all employees to maintain high integrity and professional ethics in all dealings at work, especially when they find that there may be a potential conflict of interest between their personal interests and the Company's interests. The company strictly prohibits the following dishonest behavior related to professional conduct and employee status:

1. Providing information and data in a manner that is false, falsified, or deliberately concealed all or part of the facts;
2. Exaggerating, concealing, and falsifying work performance, data, or work progress, or selectively reporting or misrepresenting for various purposes in the daily work;
3. Making false or inaccurate disclosures to the Company about personal experiences and health conditions;
4. Other dishonest behavior.

#### **Article 6. Principles for the Acceptance of Gifts and Hospitality**

The operation of Trip.com is based on the principle of “fair trade”. Therefore, employees are not allowed to receive kickbacks, bribes, secret commissions, or any other personal benefits.

#### **Article 7 Other prohibited behavior**

1. Taking advantage of his/her position or the influence of his/her position for malpractice or neglect of duty;
2. Embezzlement, misappropriation, and theft of company assets by all means; accepting, directly or indirectly, property and other benefits from others;
3. Obtaining benefits or special treatment for himself/herself or others;
4. Taking advantage of the Company's rebate activities to help partners or himself/herself obtain economic benefits;
5. Colluding with outsiders to pay at low prices but obtain high-price invoices for reimbursement in the Company, or fabricating false reasons for reimbursement;
6. Other behavior prohibited by the Company's Administrative Regulations on Anti-commercial Bribery.

#### **Article 8. Principles for the prevention of conflict of interest**

##### **1. Conflict of interest**

A so-called “conflict of interest” occurs when an individual's interests conflict with the overall interests of Trip.com. The following behavior is considered to be in conflict with the Company's interests, and the Company requires the employees to publicly report any circumstance that could lead to a conflict of interest:

- 1) Competitive enterprise: Employees are not allowed to be employed by an enterprise that competes with Trip.com or that would take away any business of Trip.com.
- 2) Corporate business opportunity: Taking advantage of the Company's resources, business channels, trade secrets, and intellectual property rights to engage in profitable activities or transfer of benefits for himself/herself or others.
- 3) Economic benefits:
  - a) Employees shall not have any economic benefits (ownership or otherwise) in any

- other business entity, directly or indirectly through a spouse or other family members;
- b) Employees shall not have any ownership interest in a private company that competes with Trip.com.
- 4) Other behavior involving conflict of interest.

### **Chapter 3 Investigation of Cases of Corruption and Fraud**

**Article 9** 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 are as below:

Hotline for whistle-blowing: 8621-54261440

E-mail for whistle-blowing: [jubao@trip.com](mailto: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](mailto:shenji@trip.com)

**Article 10** 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.

### **Chapter 4. Penalties for Facts of Corruption and Fraud**

**Article 11** Trip.com follows a principle of “zero tolerance” for any corruption and fraud. Employee violations of the Regulations will be treated in accordance with the relevant policies in the human resources of the Company. Those suspected of violating the law will be transferred to the judicial authorities pursuant to the law.