

MR Media Relations<mediarelations@booking.com>

To: Lydia de Leeuw

Wed 15/05/2024 12:39 PM

Hi Lydia,

Thank you for reaching out to Booking.com. We appreciate you sharing the findings of your research in advance and giving us the opportunity to provide clarity on the company's perspective.

Over the course of several years, we have dedicated substantial attention and resources to reviewing and considering a consistent approach toward including listings in disputed and conflict-affected areas around the world, and how we align this approach with our [Human Rights Statement](#), as well as our core values and beliefs as a company. We believe that everyone should be able to experience the world. Travel is a force for good, with the power to open minds, increase understanding and promote acceptance. If done with respect for human rights, travel can broaden horizons and reduce barriers.

We also believe that our customers should be able to make their own decisions as to where they wish or need to travel and visit, and that in general it is not our place to restrict their choices. Ultimately, we believe that limitations on the freedom to travel should be the domain of governments and not private companies.

Consistent with these beliefs, we operate under a fundamental presumption that we will permit listings anywhere in the world unless legally prohibited by the domestic laws that apply to our business, whether through sanctions or other legal mechanisms. As a result, we maintain listings in 223 countries and territories, including complex jurisdictions and various other disputed and conflict-affected areas.

International law (which applies to countries vs companies) and the laws of countries sometimes conflict, as they do in this case. Currently, there are no applicable laws that prohibit listing properties in Israeli Settlements in the West Bank, but in fact there are many US state laws that limit our ability to disengage from the region. For example, in 38 states across the United States, there are measures that discourage boycotts or divestment from Israel; and certain states explicitly bar state contractors (suppliers) from refusing to do business in Israel, or otherwise boycotting or divesting from the country or its occupied territories. In fact, legal action has been taken against other companies who have attempted to withdraw their business, and we would anticipate that to be the case for us.

As a company, we are bound by the laws of the countries where we operate. And we believe that we are in full compliance with laws set by both the Dutch and U.S. authorities. We continue to monitor the situation closely, both regarding the potential for changing laws and the safety of our customers, rigorously apply our Human Rights Statement, and take action when appropriate. This is the same approach we apply across the world.

We also want to emphasize the importance of our Human Rights Statement, and how we think about its application in this complex and international legal context. We believe that a policy that analyzes listings on a case-by-case basis, with heightened due diligence informed by the United Nations

Guiding Principles on Business and Human Rights, best comports with our fundamental beliefs in the value of travel, open borders, and customer autonomy.

Regarding our limited West Bank listings (within the context of the more than 29 million listings on our platform), we rely on both internal and external experts, and have conducted heightened human rights due diligence on these accommodation listings on our platform. Whenever we do see individual listings that may not be acting in accordance with our policies, regardless of the location, we seek to

engage with them and take appropriate action, as in other jurisdictions, which includes removing them from our platform, if necessary.

We also work to make sure customers have accurate information about their destination. That can include making sure our listings are accurately labeled, and including a banner on search results pages advising travelers to seek additional information (for example from government travel advisories) about travel to conflict-affected locations. We also apply this principle to Israeli settlements within the West Bank.

Furthermore, to appropriately balance the various risks and human rights concerns regarding disputed Israeli settlements in the West Bank, we continue to be heavily informed by robust stakeholder engagement. We work closely, and meet often, with some of the foremost experts on business and human rights for the region, and those most knowledgeable with managing the security situation. We also engage with civil society and non-governmental organizations connected to these issues. All of these stakeholders help us understand how to adhere to our values in the face of this relentless conflict and its profound complexities.

We trust that this letter has provided sufficient clarity on our position and serves as a thorough response to your allegations of illegal activity, with which we wholeheartedly disagree.

Kind regards,
Femi Thomas
Chief Compliance Officer at [Booking.com](https://www.booking.com)