Expedia Group Sanctions Screening Process

External Facing Overview

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Expedia's Sanction Screening Process

The purpose of this document is to share a high-level overview of Expedia's Sanctions Screening Process with our external partners and stakeholders.

What are sanctions and who does it apply to?

The United Nations (UN), US, EU, Canada, UK, South Korea, and Australia enforce sanctions that target terrorists, international narcotics traffickers, those engaged in activities related to weapons of mass destruction, and other threats to national security. Sanctions include economic and trade restrictions against blocked parties. Subjects of sanctions include individuals, businesses, vessels (such as ships or aircraft), and entire geographic regions.

Any entity incorporated, transacting, or operating in these jurisdictions is required to comply with sanctions regulations.

How does Expedia comply?

Expedia Group (EG) has processes to screen suppliers, partners, vendors, and travellers against sanctions lists to ensure we do not do business with blocked parties, entities, or customers. Failure to comply with Sanctions regulations could result in regulatory investigations, significant fines, and reputational damage.

Program Components

Expedia's Sanction Screening Program includes processes that support screening, decision-making, and remediation of identified issues. These processes are described below.

Partner, Vendor and Supplier Screening Requirements:

Expedia does not do business with Partners, Vendors or suppliers owned by a sanctioned entity or group.

Expedia's partner, vendor, and supplier screening includes:

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- **Scope:** The entity name, address, beneficial ownership, and bank information for all entities Expedia enters into an agreement with are screened for sanctions compliance.
- **Frequency:**
    - During partner/vendor/supplier set-up or onboarding;
    - Any time a sanctions list is updated;
    - Any time a partner/vendor/supplier updates pertinent information, including name, address, beneficial ownership, or banking information.
- **Decision and Remediation**: If a new or existing partner, vendor, or supplier is determined to be a significant sanctions risk, Expedia will immediately stop payments, remove supply from inventory, and complete any required regulatory reporting as applicable.

Customer Screening

Expedia does not facilitate transactions on behalf of sanctioned Individuals.

Expedia screens each traveller at the time of booking. Customer screening entails:

- **Scope**
    - Account Owner: The name associated with the online account used to make the booking.
    - Payor: The name listed in the credit card holder file or the individual paying for the booking.
    - Traveller: The name of the individual(s) traveling on a booking.
    - Address: The billing address used on the transaction if one was provided.

- **Frequency:** Every new/updated booking transaction.

- **Decision and Remediation:** Expedia is required to cancel bookings when customer:
    - Does not pass screening successfully; or,
    - Expedia does not have sufficient information to validate whether or not a customer is a match and deems the risk unacceptably high.