



Airbnb

Code of Ethics

2024

Hi team,

The original Airbnb team was just the three of us. Now we're a team of thousands. As we've grown, we've been incredibly intentional about our culture. At its most basic, culture is our collective behaviors. Our culture is shaped by things like our Core Values, shared behaviors, and special traditions. But one of the most important aspects of our culture is how we treat each other. We want this to be a company where everyone acts with integrity — where we're honest and respectful.

When it comes to how we treat one another, it's critical that we're all on the same page. To help with this, we've defined some simple behavioral standards in our Code of Ethics. The Code of Ethics reminds us of our responsibilities as employees to all of our stakeholders — Guests, Hosts, Communities, Employees, and Shareholders. Simply put: it outlines our expectations for how we conduct ourselves. We expect all employees to read it, understand it, and follow it. If we all commit to these standards, we'll not only maintain the culture that makes Airbnb so special, we'll strengthen it.

To keep the Code of Ethics relevant, we'll need your ongoing feedback. If you have questions or you're aware of some activity that doesn't align with these expectations, please email ethics@airbnb.com.

Thanks for all you do for Airbnb.

Brian, Joe and Nate

Index

→ Introduction

→ Serving our stakeholders

→ Belonging is everyone's responsibility

- Manager responsibilities
- Employee responsibilities
- Ethics Advisor responsibilities
- Company responsibilities
- Everyone's responsibilities
- Reporting and responses to concerns
- We prohibit retaliation

→ Respectful relationships

- We promote diversity, inclusion and equal employment opportunity
- We don't tolerate harassment or bullying
- What we expect
- We make reasonable accommodations
- When we say "mandatory," we mean it
- We are exemplary Guests & Hosts
- We are responsible with alcohol and drugs

→ We are committed to workplace safety

- We take steps to reduce the risk of, and respond to, workplace threats and violence
- We monitor our workplace to keep everyone safe and secure
- We are serious about physical security
- We prioritize employee health and safety

→ Data use, privacy, and security

- We respect privacy and protect personal data
- We protect Airbnb's intellectual property and confidential information
- We understand the importance of information security
- We use artificial intelligence and machine learning responsibly
- Additional resources relating to privacy, information security data protection, and AI

→ Additional business responsibilities

- We don't engage in fraud
- We don't engage in insider trading
- We never engage in bribery or other forms of corruption
- We recognize and avoid conflicts of interest
- We don't speak to the press or public without prior permission
- We interact responsibly and respectfully on social media
- We travel responsibly - including when we "live and work anywhere"
- We maintain business records responsibly
- We comply with U.S. and international payments regulations
- We don't make corporate loans or guarantees
- We cooperate with government inquiries
- We make accurate disclosures
- We regulate political contributions on behalf of Airbnb
- We promote fair competition

→ Waivers

→ Final Note

Introduction

Our culture is built around four Core Values — Champion the Mission, Be a Host, Embrace the Adventure, and Be a Cereal Entrepreneur. Our Code of Ethics articulates the principles we must practice to live up to these values, and to serve Airbnb's stakeholders. It summarizes our basic expectations, including our collective responsibility to act ethically and follow the law; to treat each other respectfully; to consider all of our stakeholders' needs; and to protect Airbnb in pursuing our mission.

While the Code is specifically written for Airbnb's employees, officers, directors, and subsidiaries, we expect members of our extended workforce and others who may be temporarily assigned to perform work or services for Airbnb (including temps, vendors, and independent contractors) to follow the Code in connection with their work for us. Even though the extended workforce includes people who are not employees of Airbnb, references in this Code to 'employees' are intended to include them as well. Failure of a member of our extended workforce or other covered service provider to follow the Code can result in termination of their relationship with Airbnb.

You are responsible for understanding and following the Code and the policies in the Code (and, in certain countries, your Employee Handbooks).

Serving our stakeholders

Acting ethically is at the foundation of everything we do. This means having a Code of Ethics that is consistent with our vision and in line with our commitment to Airbnb's stakeholders.

Airbnb has five stakeholders and is designed with all of them in mind. Along with employees and shareholders, we serve hosts, guests, and the communities in which they live. We intend to make long-term decisions considering all of our stakeholders, because their collective success is key for our business to thrive.

While in the short run there may be trade-offs, in the long run, and when approached with creativity, we believe that we can design a win-win for all of our stakeholders.

Adhering to our Code of Ethics supports and furthers this commitment.

Belonging is everyone's responsibility

Manager responsibilities

Managers occupy positions of authority and must be ethical role models. Managers communicate their commitment to the Code of Ethics by (1) living the Airbnb Core Values; (2) consistently upholding our high standards and avoiding even the appearance of unethical behavior; (3) holding themselves and others accountable for their decisions and behaviors; and (4) being alert to and taking steps to address situations that could violate the Code of Ethics or damage Airbnb's reputation.

Employee responsibilities

Every employee is expected to understand and follow the Code of Ethics and all Airbnb policies. You should ensure that you're familiar with the Core Values, Stakeholder Principles, and this Code when making work-related decisions. Ask yourself the following questions and if the answer to any of these is "No" or "I don't know," it is your responsibility to get help and guidance.

- Is this action legal and ethical?
- Is this action aligned with both the spirit and the letter of the Code of Ethics?
- Is this action aligned with Airbnb's Core Values?
- In significant decisions, have I considered the impact of this action on each of Airbnb's stakeholders?
- Will this action seem appropriate to others?
- Would my co-workers be embarrassed or compromised if this action were to become known within Airbnb or publicly?

The best way to safeguard Airbnb's reputation and preserve our culture is to hold ourselves accountable. No one at Airbnb has the right to discourage anyone else from reporting a Code of Ethics issue or to retaliate against anyone who reports a concern. See [We Prohibit Retaliation](#) below.

Ethics Advisor responsibilities

We have Airbnb Ethics Advisors who can help when you aren't sure how to handle a particular situation. They are trustworthy, responsible, and receive specialized ethics training. You can contact the Ethics Advisor team with general ethics-related questions.

For sensitive consults, reach out to a member of the Ethics team. To report potential Code of Ethics violations, use one of our reporting channels.

Company responsibilities

Airbnb will resolve employee questions, concerns, and reports with sensitivity and respect for employee confidentiality to the extent possible. Consequences for violating the Code of Ethics or another Airbnb policy will depend on the gravity of the violation and can result in discipline, up to and including termination of employment.

Everyone's responsibilities

We play by the rules. Airbnb complies with national, state and local laws and regulations that apply to our business. As a member of our community, you have a responsibility to be aware of and comply with the laws and regulations that apply to your role. If you don't understand a particular law or regulation or if you're not sure it applies to you, ask a member of the Legal or Ethics teams for help.

Reporting and responses to concerns

Airbnb is committed to responding to employee concerns, complaints and reports. If you see, hear or learn of inappropriate behavior, share your concerns, even if you're uncertain about whether someone has violated the Code. There are many ways to report issues, including sharing them with the employees in the groups listed below. These employees have an obligation to promptly report any violations.

- Any manager
- Any Ethics Advisor

- Any Talent Partner
- Any Diversity and Belonging (“D&B”) Partner
- Any member of the Employee Relations team
- Any member of the Ethics or Employment Legal teams.

Harassment, Bullying, Discrimination & Retaliation Prevention Policy for more information.

You may also submit a report, directly or anonymously, through our Ethics Hotline or through Vault. As outlined in more detail below, Airbnb prohibits retaliation for raising a concern.

Airbnb will thoroughly, promptly, and impartially examine and address every report of a violation of the Code of Ethics. While we can’t guarantee absolute confidentiality or anonymity, we will take appropriate steps to maintain confidentiality and anonymity by only informing employees who need to know for business reasons. If Airbnb conducts an investigation, employees are required to cooperate by providing truthful and complete responses.

When claims are fully or partially substantiated, we’ll take appropriate action, which can include, among other things, training and coaching, warnings, and termination of employment or other business relationships.

We prohibit retaliation

Retaliation for making a complaint under any policy or for engaging in any form of protected activity is prohibited. This includes taking adverse employment actions for:

- Reporting conduct or behavior prohibited by any policy or assisting another individual in doing so
- Cooperating in an investigation into such alleged conduct
- Filing an administrative claim with any governmental agency
- Engaging in any other protected activity under applicable law.

If you suspect retaliation or have any questions about it, you may report or seek help through any of the channels described in the [Reporting and Responses to Concerns](#) section above. You may also review our Whistleblower Policy and Global

Respectful relationships

It's every employee's responsibility to foster a respectful and inclusive work environment. The policies below outline the minimum expectations for respectful interactions at work.

We promote diversity, inclusion, and equal employment opportunity

We believe in equal employment opportunity, which means we respect and embrace each other's differences. We give every applicant and employee equal opportunities and we uphold country, regional, and local laws that protect people based on characteristics and status. Protected characteristics and statuses around the world include such things as: race, color, religion or religious creed, sex or gender (which includes harassment, discrimination or bullying based on gender identity, gender expression, transgender status, pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, national origin, caste, age, mental or physical disability, ancestry, medical condition, genetic information, marital status, military or veteran status, citizenship or any other characteristic legally protected under applicable laws.

We practice and promote equal opportunity in every employment-related activity and at every Airbnb location. We make employment-related decisions only on the basis of individual ability, performance, experience, and business requirements. Our employees should be free from discrimination in all aspects of employment — from recruitment and hiring, compensation, performance evaluations, project assignments, training opportunities, promotions, to the end of employment.

Please see Airbnb's Global Harassment, Bullying, Discrimination & Retaliation Prevention Policy for further information, reporting procedures, and Airbnb's prohibition of retaliation. Local Employee Handbooks may also apply.

We don't tolerate discrimination, harassment, bullying, or retaliation

We're all hosts at Airbnb. We're open-minded, respectful and hospitable. We're committed to and look out for each other. Harassment, bullying, discrimination, and retaliation are incompatible with our values and are not tolerated. Our Global Harassment, Bullying, Discrimination & Retaliation Prevention Policy defines these terms, and explains how we ensure that our workplace is free of them. Any employee who is found to have violated this Policy will be subject to appropriate disciplinary action, up to and including termination of employment.

What we expect

We expect managers to maintain a healthy, inclusive work environment — where harassment, bullying, discrimination, and retaliation are never tolerated. Managers may not have personal relationships (ongoing or past romantic or intimate relationships) that violate the Global Harassment, Bullying, Discrimination & Retaliation Prevention Policy or Conflict of Interest Policy. Any personal relationships in the workplace should also comply with these policies, to avoid conflicts of interest, the appearance of a conflict of interest, favoritism, or an unfair advantage. If you have questions, concerns, or need to disclose a personal relationship, reach out to your Talent Partner, Ethics Advisor, or Employee Relations.

A healthy, inclusive work environment is not exclusively a manager's responsibility. A culture of belonging requires everyone to act appropriately with co-workers, contingent workers, vendors, and guests and to take action when necessary to ensure our work environment is free from harassment, bullying, discrimination, and retaliation.

We make reasonable accommodations

Consistent with our commitment to diversity, inclusion, and equal employment opportunity, we provide reasonable accommodations to qualified applicants and employees with disabilities. Please review our U.S. Accommodation Policy or contact your Talent Partner for local policies and practices.

When we say “mandatory,” we mean it

We offer mandatory training on topics including harassment, discrimination and others (your Employee Handbook may outline which apply specifically to you). All global employees are required to complete mandatory training, which will be assigned to you and must be completed by the required deadlines. Failure to timely complete these trainings may result in employee discipline, up to and including termination of employment.

We are respectful and responsible guests and hosts

We are proud to have so many employees who champion Airbnb’s mission – not just at work, but also when they use the Airbnb platform. As an employee, you represent Airbnb and its Core Values in our community. This is a significant responsibility. We expect every employee who hosts through the Airbnb platform to comply with local laws, including short-term rental regulations. And as a guest, co-traveller or a host using Airbnb, we expect every employee to be a respectful and responsible member of the Airbnb community. Whether hosting or traveling for business or leisure, a respectful and responsible user always follows the rules of the listing, Airbnb’s Legal Terms (including Terms of Service, Community Policies, and the Nondiscrimination Policy).

If you, your friends, or family have any issue on the platform, your first stop must always be Community Support (“CS”). If CS is unable to assist, or if you have concerns about how your issue was resolved, you may use the employee escalation portal. Other than for specific, designated roles, the portal is the only authorized channel for escalating your, your friends’, and your family’s CS issues. If a stranger reports any CS issue to you – over LinkedIn, in an e-mail solicitation, or through paid advertising – be alert. Some strangers are fraudulent actors, who are after your inside knowledge of Airbnb. You must never share

Airbnb’s confidential information – about platform defenses or anything else – with anyone outside of the company.

If you have any questions or concerns, please raise them in any of the channels described in the [Reporting and Responses to Concerns](#) section above.

We are responsible with alcohol and drugs

We are committed to ensuring that drugs and alcohol never compromise employee, guest, or community safety and security. If you’re engaging with Airbnb colleagues or doing Airbnb work, we expect you to exercise good judgment and act responsibly at all times, and to follow the Code of Ethics. This is the case whenever co-workers gather – whether you’re online, at our offices, or off-site with colleagues, including after-hours.

It’s never acceptable to be under the influence of drugs or alcohol on Airbnb premises or while working such that your ability to safely and effectively perform your job or behave appropriately would be impaired. This prohibition applies to substances including certain legal and illegal drugs, inhalants and prescription or over-the-counter medications, whether prescribed for you or not. No one is allowed to possess, sell, purchase, or distribute illegal drugs on our premises or while conducting Airbnb business (including at any Airbnb-sponsored event or in Airbnb-provided transportation). Please note that in many countries where we operate, the penalty for drug use is severe and we expect all employees to observe local laws. If you are unsure of whether a certain substance is prohibited, please contact your Talent Partner or an Ethics Advisor. In addition, if you require a medical accommodation involving the above-mentioned substances or similar, please review the Accommodation Policy or contact your Talent Partner with any questions. If you think you have a drug or alcohol-related problem, you may take advantage of Airbnb’s Employee Assistance Program (“EAP”).

Employees and their guests must be of a legal drinking age, behave responsibly, and follow office policies with respect to drinking alcohol at Airbnb offices and at Airbnb-sponsored events. It is never okay to offer a drink to anyone (guest, intern, or

otherwise) who is not old enough to legally drink alcohol — whether in Airbnb offices or at Airbnb events. Work settings are not for excessive consumption of alcohol and we expect you to know your limits and treat each other with respect.

We also expect employees to act professionally when hosting events with alcohol in a work setting. For instance, employees hosting work events should serve food, offer non-alcoholic beverages and respect their colleagues' decisions (like when they say they've had enough to drink). Read the Global Alcoholic Beverage Policy to learn more about Airbnb's expectations relating to alcohol consumption and drugs, and gatherings at which alcohol is served.

We are committed to workplace safety

When we say “Be A Host,” we mean look out for each other and take care of each other. We’ve worked very hard to create a safe, secure and healthy environment to support our mission and values. Every employee plays a role in protecting the safety and security of our community.

We take steps to reduce the risk of, and respond to, workplace threats and violence

Nothing is more important than the safety of our community, so we strictly prohibit violence and threats of violence in any work environment, at any work-related or Airbnb-sponsored event, or online. Examples include, but are not limited to, physical violence, threats, harassing phone calls, sending threatening or aggressive emails or other written communication, stalking, and intentionally destroying personal and/or company property. We don’t permit employees to have dangerous items like weapons, explosives or firearms while working or attending any Airbnb function, whether in our facilities or off-site. Read more in our Global Workplace Violence Prevention Policy.

We monitor our workplace to keep everyone safe and secure

For everyone’s safety and security, Airbnb may need to inspect company property (like lockers, cubbies, laptops (including data created or stored on laptops), databases, huddle rooms, storage areas, etc.) and bags, boxes or containers brought onto our property. Of course, we will comply with local and regional laws that regulate employee safety, security, privacy and data protection.

We are serious about physical security

Per Airbnb’s Employee Badge and Access Control Guidelines, we expect all employees to take care to maintain the safety and security of our workplace and to care for our shared investments as if they were your own.

Please review and become familiar with our Guidelines which, among other things, require all badge-holders to keep their badges with them at

all times, wear their badges so they are visible at all times, and email a member of the Global Safety and Security team right away if a badge is lost, stolen, or misplaced. Employees are responsible for escorting their guests, and may not leave them unattended.

We prioritize employee health and safety

We value our employees and work hard to safeguard your health and well-being. We try to identify and correct every potential workplace hazard, but we also rely on you to alert us to dangers.

If you see, learn of, or experience an imminent life safety issue, such as feeling physically threatened or learning that an employee plans to engage in self-harm, you should immediately report it to your local law enforcement. When it’s safe to do so, please contact Airbnb’s Global Security Operations Center (GSOC) by e-mail or by phone. This team is available 24/7.

For non-urgent safety issues, please feel free to contact any of the reporting channels listed in the [Reporting and Responses to Concerns](#) section above. Employees may also report workplace safety and health concerns or hazards, and all work-related injuries and illnesses.

Data use, privacy, and security

We respect privacy and protect personal data

Airbnb wouldn't exist without the trust of our community. We honor this trust by being transparent about how we use personal data of our guests, hosts, employees, and other stakeholders. We are committed to managing personal data consistently, as outlined in our legal obligations and policies.

A set of principles guide us in honoring our data practices:

- **For user benefit** - We use data to power experiences.
- **Transparency** - We are transparent about how we collect and use personal data.
- **Control** - We put individuals in control of their personal data.
- **Security** - We protect the personal data our stakeholders entrust to us through strong security measures.

We've also put in place strong privacy and information security policies and practices that respect stakeholder privacy in both physical and digital spaces. Managing and protecting personal data appropriately is everyone's job. You must follow data protection and privacy laws, and our internal policies, standards, procedures, and controls.

For your protection and the protection of our community, don't access or attempt to access guest, host, or other personal data for personal reasons. Instead, you must only access information as needed to do your job. Airbnb has zero tolerance for abuse of access, which is strictly prohibited and may lead to termination of employment.

Please familiarize yourself with our internal Airbnb Privacy Standard, which provides guardrails for how Airbnb can collect, store, use, share, and retain data in a manner that respects privacy laws

globally and maintains trust with our community. If you have questions about how to appropriately handle personal data, or on which laws or policies are applicable to your role, you can raise them to the Privacy team. If you become aware of a data incident, such as unauthorized access or disclosure of personal data, report it to Privacy immediately.

We protect Airbnb's intellectual property and confidential information

Every employee must protect Airbnb's intellectual property and confidential information. Intellectual property includes patents, copyrights, trademarks, and trade secrets. Confidential information is information that the public does not – or should not – have access to, from Airbnb's proprietary software, algorithms, and personal data, to marketing and merger strategy. We should take all steps and precautions necessary to restrict access to and secure Airbnb's intellectual property and confidential information by:

- Maintaining the confidentiality of Airbnb-related transactions
- Conducting our business and social activities so as not to risk inadvertent disclosure of confidential information
Review of confidential documents in public places should be conducted so as to prevent access by unauthorized persons
- Restricting access to documents and files (including computer files) containing material, non-public information to individuals on a need-to-know basis (including maintaining control over the distribution of documents and drafts of documents)
- Promptly removing and cleaning up all confidential documents and other materials from conference rooms following the conclusion of any meetings (including erasing any whiteboards or other viewable information)

- Securely disposing of all confidential documents and other papers, after there is no longer any business or other legally required need, through shredders when appropriate
- Restricting access to areas likely to contain confidential documents or material, non-public information, including individual offices that may contain such information
- Avoiding the discussion of confidential information in places where the information could be overheard by others, such as in elevators, restrooms, hallways, restaurants, airplanes, taxicabs – or at home
- Conducting business and activities relating to confidential information in areas separate from other Airbnb activities, to the extent feasible
- Properly classifying, labeling, handling, and storing Airbnb's materials, data, and documents
- Only use devices authorized to access Airbnb systems, data, and to carry out your business responsibilities. Authorized devices are those managed by Airbnb
- Safeguarding laptop computers, mobile devices, tablets, memory sticks and other items that contain confidential information
- Complying with Airbnb's Information Security Policies, including the Acceptable Use Policy, to prevent unauthorized access to devices and/or electronic information to which you have access.

Airbnb, not any one individual, owns the intellectual property and confidential information you help create during your employment. It's your responsibility to use it only for Airbnb's benefit and not to use or disclose it for any other purpose. You may only share it with anyone outside Airbnb subject to a nondisclosure agreement, after approval by Legal. Sharing confidential data and intellectual property online, outside of the systems authorized by Airbnb, including on third party apps, is strictly prohibited. When you leave Airbnb, you cannot take any intellectual property you helped develop, or confidential information you had access to.

- To learn more about data classification and handling, review the Requirements for Handling Data.
- To learn more about the proper collection, storage, use, sharing, and retention of personal and business data, review and follow the AirPrivacy Standard and Information Security Acceptable Use Policy, and other procedures that apply to your role.
- Raise questions about the Acceptable Use Policy with the Information Security team or your designated Security Champion.
- Raise any questions about patents with the Patents team, and trademarks with the Trademarks team.

In addition, Airbnb prohibits you from using confidential information, intellectual property, or trade secrets of others, including but not limited to your prior employers, in your Airbnb work. You must also protect the copyrighted information and trade secrets of others and may not make unauthorized copies or incorporate it into your own work.

To learn more about protecting confidential information and intellectual property, please review your Employee Invention Assignment and Confidentiality Agreement, which is located under the 'Personal' section of your Workday Profile.

We understand the importance of information security

At Airbnb, we maintain the security of our information technology ("IT") systems. The policies for Information Security and Privacy at Airbnb contain important information about company IT security and privacy and data protection expectations and requirements, including how to fulfill these expectations and requirements when working in public places or traveling. You must review, understand, and follow the Acceptable Use Policy.

To reach out for help:

- Contact the relevant Information Security team, or your designated Security Champion.

- Any actual or suspected cybersecurity incidents must be reported to the Computer Security Incident Response Team.
- Suspected phishing must be reported through the phishing reporting channel.

We use artificial intelligence and machine learning responsibly

As the pace of innovation within artificial intelligence (“AI”) accelerates and its capabilities expand, we encourage you to embrace the opportunity it represents to transform the way you work. Airbnb has established principles, policies, and processes to help ensure that our use of AI is responsible, and consistent with our Core Values.

If you want to use AI in your work, please refer to our Responsible AI Use Policy, which identifies the AI tools that have been approved for internal productivity and product development. Please don’t use tools that haven’t been approved, and remember that you are always responsible for your work regardless of whether you use AI to do it.

If you are wondering how you should use AI and whether it’s consistent with our values, please consider our Responsible AI Principles, which articulate the values that guide our development and implementation of AI at Airbnb. To raise questions about the responsible use of AI, reach out to the AI Governance team.

If you are working on building an AI or machine learning (“ML”) model or system, please follow Airbnb’s mandatory AI/ML Review Process.

Additional business Responsibilities

We don't engage in fraud

We strictly prohibit fraud, including, but not limited to, falsifying records or expense reports, lying in an investigation, or misrepresenting previous employment history. Engaging in such conduct can subject you to discipline, up to and including termination of employment.

We don't engage in insider trading

Insider trading occurs when a person purchases or sells a security (e.g., a stock) while in possession of material nonpublic information. Nonpublic information is information to which the public does not or should not have access. Information is considered “material” if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell, or hold a security, or if the information is likely to have a significant effect on the market price of the security. Employees who learn material nonpublic information about Airbnb or companies Airbnb does business with may not use that information to buy or sell a security and may not advise any other person to buy or sell a security based on that information. Review our Insider Trading Policy and FAQs for more information. If you have additional questions, you may reach out to the Trading Legal team.

We never engage in bribery or other forms of corruption

Airbnb's Global Anti-Bribery & Corruption Policy forbids giving or receiving — either directly or through a third party — gifts, entertainment or things of value meant to influence a business decision, policy decision or create a reciprocal obligation. Bribery and corruption can result in legal, financial and reputational harm to Airbnb, so it's very important to understand and follow the policy. If you have any questions regarding the Anti-Bribery & Corruption Policy, please contact the Ethics & Compliance team.

We recognize and avoid conflicts of interest

A conflict of interest develops when personal loyalties or interests are or appear to be, at odds with Airbnb's interests. Relationships, financial interests, outside activities, and receiving gifts or entertainment from vendors, suppliers and partners can create potential, actual or perceived conflicts of interest. A conflict raises doubts about the quality of a business decision and the decision-maker's integrity. We must never let conflicts of interest interfere with our loyalty to Airbnb and should never take personal advantage of an opportunity that belongs to Airbnb. When a potential, actual, or perceived conflict does arise, your responsibility is simple: disclose to Ethics as required by the Conflict of Interest Policy. Directors, executive officers, and 5% stockholders (and their family members/controlled entities) should also review the Related Person Transaction Policy for more information.

We don't speak to the press or public without prior permission

Under Airbnb's Global Spokesperson Policy, only “Authorized Spokespeople” may represent Airbnb at public forums or events; or speak on behalf of Airbnb with outside parties, including the press, the media, securityholders, analysts, and/or the investment community. This includes any “on the record,” “off the record,” “background” or “not for attribution” comments to journalists, bloggers, influencers, industry analysts, investors or others through any public forum, panel or public speaking engagement, such as conferences or industry events. If you inadvertently make a comment without obtaining advance approval from the Communications Team, you must report any such statements to the press team.

Before you or your team agree to any external communications such as written materials released to the public, speaking engagements, panels, public speeches, podcasts, or press interviews, you must receive approval from legal counsel, Investor

Relations and the Communications teams. Before contacting this alias, please review the Global Spokesperson Policy to ensure that your proposed external engagement follows the advised considerations. Please provide a minimum of two-week notice from the proposed date of the interview, and confirm that it does not fall within 7 days of when we report earnings or hold a product launch.

We interact responsibly and respectfully on social media and in online communications

Employees are accountable for what they do and say in internal social media channels, forums, and online modes of communication; and external social media channels in which the content could be attributed to Airbnb. This includes channels that publicly identify you as an Airbnb employee, or that Airbnb stakeholders can access. Please read and follow Airbnb's Social Media and Online Communications Policy, which provides guidance for communicating responsibly, respectfully, and in compliance with the Global Harassment, Bullying, Discrimination, & Retaliation Prevention Policy. If you have any questions about the Social Media Policy, please contact the Social Media team.

We travel responsibly – including when we “live and work anywhere”

If you choose to Live and Work Anywhere, please review and follow the policies and FAQs set forth in the Live and Work Anywhere site, including those relating to workplace flexibility, relocating in-country, and nomadism. For example, if you are planning to change your work location, please make sure your manager knows and is aligned, and that you've received approval through the nomad or in-country relocation process.

Relatedly, be sure to keep your current location up to date in Workday. The Global Safety and Security team monitors security incidents and emergency events around the world. If they don't know where you are, it's much harder for Airbnb to support you during a catastrophic event or natural disaster.

If you travel for work, you should read and follow the Travel and Expense Policy. If you travel for leisure using your Employee Travel Credit, familiarize yourself with the relevant guidance, which prohibits fraudulent use and inappropriate

transfers. And whether you travel for work or pleasure on the platform, you should be in the same position as a non-employee guest. Don't abuse your administrative privileges for personal gain by, for example, reviewing message threads or researching users without a legitimate business purpose.

We maintain business records responsibly

As a public company, we are required to comply with financial reporting standards and regulations, including the Sarbanes-Oxley Act (“SOX”). As a result, we follow legal and business rules that relate to written and electronic business records. We maintain accurate books and records and don't tolerate any employee fabricating books and records. We must ensure that business records are stored in approved formats, systems or locations. More specifically, you may not destroy or discard documents and information relevant to a lawsuit or legal action (in other words, subject to a “Legal Hold”) without Legal Department approval. Send an email if you have questions about documents or information subject to a Legal Hold.

We comply with U.S. and international payments regulations

We make every effort to comply with payment regulations in the US and abroad. As a result, we are committed to ensuring that Airbnb, and members of our community, are involved in legitimate business activities, and that we process payments to and from legitimate sources. We have implemented appropriate controls to prevent, detect and respond to money-laundering risks.

To protect against threats to economic and national security – from targeted countries, regimes, organizations, and individuals – U.S. foreign policy sets forth sanctions. These complex sanctions change regularly, and are administered and enforced by the U.S. Office of Foreign Assets Control (“OFAC”). Other countries also require similar controls.

Email the Payments Compliance team before you conduct any Airbnb business that may raise an anti-money laundering, sanctions, or other payments compliance issue. We are familiar with payments regulations and we can help you

determine if the action you propose complies with payments regulations.

We don't make corporate loans or guarantees

Federal law prohibits Airbnb from making loans and guarantees of obligations to directors, executive officers, and members of their immediate families.

We cooperate with government inquiries

We may receive inquiries from government agencies. If you are contacted by a government agency, seek advice from a member of the Legal Department before responding. However, nothing in the Code is intended to limit your right or ability to file claims of illegal conduct with federal or state agencies or regulatory authorities; or to otherwise participate in an agency investigation, administrative proceeding, forum, or proceeding as legally required.

We make accurate disclosures

We take actions necessary to ensure full, fair, accurate, timely, and understandable disclosure in our reports and documents filed with the Securities and Exchange Commission and other public communications.

We regulate political contributions on behalf of Airbnb

Airbnb sometimes engages in the political process by making contributions to support candidates and issues that are aligned with our interests. The laws regarding corporate political contributions are complex and vary from city to city, state to state and country to country. To help ensure that Airbnb complies with these laws, only the Chief Legal Officer and the Global Head of Policy and Communications and certain individuals they designate, have the authority to approve political contributions on behalf of Airbnb. In addition, the Ethics team must review and approve contributions in advance. Political contributions are not limited to cash donations. Paying for a public official or candidate to attend an event or using company resources (e.g., computers, supplies, employee time, etc.) to support a campaign could also be considered improper political contributions.

We promote fair competition

We insist on the highest levels of integrity and comply with all antitrust or competition laws. When we compete, we:

- Always ensure that our conduct is pro-competitive
- Succeed because of our great people, our compelling vision, the quality of our product and our superior marketing
- Develop and implement our business strategies independently, and don't make formal or informal agreements that unlawfully restrict competition or engage in other anti-competitive practices
- Don't make false claims about our competitors' products and services, as well as our own
- Don't seek or knowingly use our competitors' competitive information unless it is both fair and lawful to obtain, have, or use it.

"Competitive information" includes anything related to the competitive environment in which Airbnb operates, including information about a competitor's products, services, markets, and pricing, pricing algorithms, discounts, supplier costs, customer relationships, financial information, or business plans or strategies. It's good business to study our competitors, but only if we do it fairly, ethically and in compliance with all laws and regulations that apply to Airbnb. Legitimate sources of competitive information include publicly available news accounts, competitors' displays at conferences and trade shows that are publicly available and equally accessible by other market players, and information publicly available on the Internet. In some circumstances, it may also be acceptable to acquire third parties' competitive information by obtaining a license to use the information or purchasing ownership of the information, provided that you get prior sign off from the legal team. If you have any doubts about the competitive information that you are allowed to obtain or use, please speak to the legal team first.

It is never acceptable to seek or knowingly use competitive information if:

- It is obtained by unethical or illegal means, including theft, bribery, eavesdropping or unauthorized tape-recording of any third party, including a customer or supplier, or unauthorized computer devices, including those with the intent or the result of evading another company's security or privacy mechanisms
- It was unlawfully obtained in exchange for compensation, employment considerations, gifts or anything else of value
- It constitutes unlicensed technical or engineering data protected by trade secret laws.

If you receive or are offered data or information about a competitor in circumstances which cause you any concern, you should not distribute it and should seek advice from the legal team immediately. You should not share Airbnb competitive information with an Airbnb competitor (directly or indirectly), even if it is disclosed subject to a nondisclosure agreement, absent advice from the legal team. Finally, always remember that hosts may compete with each other and so you should not share competitively sensitive information about a host with a competing host.

Waivers

Any waiver of this Code of Ethics for Airbnb's directors, executive officers or other principal financial officers may be made only by the disinterested members of the Board and will be disclosed to the public as required by law or Nasdaq Listing Standards. Waivers of this Code of Ethics for other employees may be made only by Airbnb's Chief Legal Officer. For the avoidance of doubt, the foregoing does not apply to any waiver of the separate policies, guidelines and procedures referenced in this Code of Ethics.

Final note

YOU are the key to keeping the Code of Ethics relevant and effective. Demonstrate honesty and high ethical standards in all business dealings. Treat guests, partners, vendors, employees, and others with respect and courtesy.

If you see, hear or learn about a possible violation of the Code of Ethics, please report to:

- Your or any manager
- Any Ethics Advisor
- Any Talent Partner
- Any Diversity and Belonging ("D&B") Partner
- Any member of the Employee Relations team
- Any member of the Ethics or Employment Legal teams
- The Ethics Hotline
- The Vault Platform App.

If together we insist on respectful relationships and a safe and secure workplace, we will ensure that Airbnb remains a healthy and sustainable workplace for decades to come. This Code is not intended to and does not create any rights in any employee, customer, client, visitor, supplier, competitor, shareholder, or any other person or entity.