

Booking.com

Digital Services Act

**2024 - Mitigation Measures Completion Report
conducted by Booking.com B.V. under the Digital
Services Act**

Introduction

At Booking.com, our mission is to make it easier for everyone to experience the world. We believe that travel can bring out the best in humanity. Travel promotes a better understanding of different cultures and ways of life. We also believe in and work towards making travel a force for good in the world - one that enriches people's lives through a range of experiences, big and small. As a travel platform, it is at the core of our activities to facilitate travel experiences centred on our customers and underpinned by our values.

Our long-held values as well as our guidelines and terms and conditions for all users of our platform - travellers and supply partners - are designed to foster safe and welcoming travel experiences for all.

- ❖ **Travel Respectfully (Act with Integrity)** - We expect our employees, customers and partners that offer services on our platform ("supply partners") to treat each other with respect. We prohibit any form of harassment, discrimination, hate speech, manipulation, physical violence or any other threatening or abusive behaviour. Additionally, we expect our supply partners and travellers to conduct business on our platform in an honest and professional manner, to not misrepresent themselves and to respect agreements that are made with each other.
- ❖ **Travel Safely** - The safety (physical and otherwise) of our travellers, supply partners and employees is our priority. Users of our platform may not engage in or promote any activities that bring harm to any person.
- ❖ **Travel Confidently** - We are committed to providing the best user experience for everybody who uses our travel services. That means that we take user privacy seriously and are committed to protecting and safeguarding user privacy in accordance with our Privacy and Cookie Statement and applicable laws. We are dedicated to ensuring that our online environment is trusted and secure. We exercise vigilance to ensure that we iterate our processes and controls to address emerging challenges and risks and do so in real time. Keeping data provided on our platform safe and secure is important to us. Booking.com therefore protects users' personal data in line with applicable laws, including the GDPR and the data security standards of the Payment Card Industry (PCI DSS).

At Booking.com, we believe that the importance of the travel industry as a powerful global economic driver cannot be viewed separately from our responsibility to ensure there is a world worth experiencing for future generations. Sustainability is not only intertwined with the long-term viability of our industry, it is foundational to our business. Our environmental, social, and governance (ESG) initiatives, processes and principles demonstrate our continued emphasis on being a sustainable and ethical global business.

We are committed to respecting and promoting human rights wherever we do business. As one of the world's leading online travel companies, we seek to avoid infringing on the rights of others and work to address adverse human rights impacts of our business and the travel sector. Our commitment to respect and promote human rights, as reflected in our [Human Rights Statement](#), is based on internationally recognized standards and principles, including the United Nations (UN) Guiding Principles on Business and Human Rights.

At Booking.com we measure success not only by the value that we create for our company but by the positive impact we create for all - our employees, customers, partners, communities, other stakeholders, stockholders and governments.

We also take our regulatory obligations seriously. We dedicate significant resources to complying with new and existing regulations applicable to us around the world, including the EU's Digital Services Act (DSA). This report contains the mitigation measures put in place following our 2023 systemic risk assessment as required by the DSA.

Section 1 - Mitigation Measures Completion Report

The DSA requires providers of “very large online platforms” (VLOPs) to conduct, at least once a year, risk assessments to determine if and how their services (or the (mis)use of their services) may pose systemic risks to citizens in the European Union (EU). Our 2023 risk assessment has shown that the design and functioning of **Booking.com does not pose significant systemic risks to EU citizens because of the nature of our service and our history of continuously assessing and mitigating risks to society**. Compared to other types of platforms designated as VLOPs by the European Commission such as social media platforms, Booking.com ranks on the low end of the risk spectrum.

To address risks identified, the DSA provides that VLOPs must put in place reasonable, proportionate and effective mitigation measures. The Booking.com online platform (“Booking.com” or the “platform”) has received a VLOP designation, and this report sets out the mitigation measures put in place to mitigate risks identified in our 2023 risk assessment. It has been prepared under the supervision of the Head of DSA Compliance Function, and has been reviewed and approved by the company’s DSA Management Body.

Our approach to mitigating risks under the DSA is iterative and continuous. We monitor ongoing changes throughout the year, ensuring our mitigation plan remains relevant and effective in an ever-changing product and market environment. We believe this approach aligns with the systemic risk management principles outlined in the DSA and contributes to the effectiveness of the plan by aligning DSA objectives with company processes. We collaborate closely with key stakeholder groups in our organisation (including Trust and Safety, Content Integrity, Data Privacy and others) to leverage their knowledge and expertise in designing and implementing appropriate measures to address risks relevant to our business environment. We also track completion of measures that have been agreed upon throughout the year.

The DSA aims to enhance online safety and a number of measures implemented to comply with DSA obligations have a commensurate effect on the risks identified in the 2023 systemic risk assessment. Section 2 of this report thus details the measures Booking.com has implemented to comply with DSA obligations. Section 3 maps our existing safety features and as well as additional measures for each risk, presented in the order of the 2023 risk assessment report, with the exception of certain risks that have been grouped together as they are responsive to the same mitigation measures.

Section 2 - Mitigation of risk following implementation of the DSA compliance measures

The DSA has been enacted with the primary mission to create a safer digital space where the fundamental rights of users are protected. As such, the core objective of the DSA is to reduce risks associated with digital services, ensuring that online environments are secure, transparent and accountable.

As stipulated in our Code of Conduct, we are committed to operating in compliance with all applicable laws in every jurisdiction where we do business. We also attach significant importance to the objectives pursued by the DSA, which we have been conscious of, and have been addressing prior to the introduction of the DSA. We have dedicated significant time and resources to meet the regulatory requirements in the DSA and have introduced a range of new functionalities and enhanced some of our existing compliance mechanisms.

Subsequent to the date of application of the DSA to Booking.com, we further enhanced our processes for reporting, investigating and where relevant taking down illegal content. We have added dedicated resources in this area and standardised current practices to bring them in line with DSA compliance mechanisms, including:

1. **Expanded Reporting Mechanisms**. Anyone browsing on our platform is able to report illegal content or listings as well as alleged intellectual property infringements that they encounter anywhere on our service via a [webform](#). Prior to this, and continuing alongside it, travellers, supply partners and employees are able to report misconduct on the platform via our Customer Service or via the [Compliance helpline](#) reporting function and supply partners (e.g. via their account managers or local representatives) and employees are offered additional avenues of reporting content that infringes our policies.
2. **Enhanced Content Removal and Notification**. Content owners receive in a timely manner a clear and specific reason for the restriction or removal of their content with reference to our Content Standards and Guidelines.
3. **Technology and Human-Aided Content Moderation**. We have in-house machine learning models that scan potentially harmful or inappropriate content such as complaints, chats, emails from partners to guests, partner's replies to reviews, etc. in English and 139 additional languages. We use sophisticated automated translation

tools for any other languages. Content flagged by those systems is subject to additional human review carried out by a team of global moderators. Newly developed systems ensure that, when we moderate content (either via our own content moderation efforts or because of notifications received through the webform), content owners are given the opportunity to appeal against the decision taken within 6 months. Our Content Moderation team monitors data on appeals submitted to ensure quality, control and their timely handling.

4. **Content Flagging by Authorised Bodies.** We implemented a dedicated flow for public authorities to flag and request removal of illegal content and listings on our platform. Guidelines were published on the platform to inform authorities on the procedure for submitting such requests and how Booking.com will handle any such requests received.
5. **Expanded Training and Awareness for Related Teams and Partners.** Our Customer Service and Partner Service functions are being trained to enhance their knowledge of our content moderation activities to further improve the effectiveness of our detection, investigation and content removal process. Our Content Moderation team regularly participates in advanced training on identifying harmful content, and our Trust and Safety team receives specialised workshops to enhance investigative techniques and comprehensive courses on risk assessment and management. These trainings seek to ensure that decisions on the enforcement of our policies are consistently applied and that the appropriate escalation procedures are known by all agents working on these important topics. We also offer training to our supply partners and provide them with comprehensive resources on the Partner Hub to enhance their awareness of human rights issues.

The measures outlined above were introduced after the completion of our 2023 systemic risk assessment and contribute to mitigating a large number of risks identified.

Section 3 - Other mitigation measures implemented

	Risks	2023 Tier	Other responsive mitigation measures
1.	Risks that:		<ul style="list-style-type: none"> • Our Content Standards and Guidelines set out Booking.com's expectations of acceptable content for travellers and supply partners and include specific reference to (promoting) discriminatory language against a person or groups, hate speech and violence, as well as content promoting violence. • Our terms and conditions for supply partners require them to respect the fundamental rights of customers and to not engage in or allow discrimination. • We have a range of content moderation policies and enforcement options in place which seek to combat such conduct on the platform (see section 2 above). • In the past year, we have further refined our approach to assessing hate speech and discriminatory content, and have established an internal review and escalation path to a newly created Content Moderation Committee. • In 2023, we published a Statement on Non-Discrimination, Harassment, and Abuse on our Partner Hub which further outlines behavioural expectations, and we provide targeted trainings to supply partners to educate them on the risk of discrimination as well as the potential consequences of violations Booking.com's policies. We have also published an article in the Partner Hub to provide guidance to supply partners on welcoming guests with assistance animals and how they can ensure they are respecting relevant anti-discrimination regulations as well as our policies.
	(i) users may engage in discriminatory behaviour towards other users on the platform;	1	
	(ii) illegal hate speech may be available on the platform;	2	
	(iii) content may be available on the platform promoting discriminatory beliefs, values or harmful stereotypes;		
	(iv) users may engage in online behaviour that amounts to, incites or encourages gender-based violence; and		

	(v) users may engage in abusive behaviour towards other users on the platform.		<ul style="list-style-type: none"> • Our Trust and Safety team takes action against travellers and supply partners that have engaged in discrimination, ranging from warnings to termination. • Our Content Integrity and Trust and Safety teams receive training to respectively detect and react to any such cases. • We are expanding dedicated training to our Customer Service and Partner Service teams on the detection and escalation of cases related to discrimination to further ensure that our policies are consistently and properly enforced throughout.
2.	Risks:		<ul style="list-style-type: none"> • We have a team of experienced consumer law and compliance professionals charged with promoting compliance with relevant rules and regulations. • Our partner terms and conditions set out the expectation that supply partner's conditions “<i>make sense for all parties</i>” (including consumers), and that they will not misuse the platform with excessive or extortionate rates or conditions. Supply partners must also comply with all local regulations and are offered guidance on the Partner Hub on complying with European Union consumer law and other local regulations. • Our Content Standards and Guidelines prohibit content that is likely to mislead, deceive or confuse travellers. • We have extensive content moderation practices and processes designed to identify and remove such content within a listing, including machine learning models that seek to detect properties that do not exist prior to becoming available to travellers. • We conduct investigations into suspected instances of fraudulent properties. • We conduct risk-based due diligence on our supply partners including
	(i) of unfair commercial practices due to misleading descriptions, pictures or illegal charges,	2	
	(ii) of abuse or misuse of service by publishing of listings for fraudulent purposes; and		
	(iii) that users may submit reviews containing false information.	3	

			<p>having verification methods in place aimed at verifying the location of properties and utilising machine learning models to identify fraudulent properties (e.g. video uploads and calls).</p> <ul style="list-style-type: none"> • Commercial or self-promotional content in reviews is not allowed on Booking.com, and is addressed by our moderation teams and travellers and supply partners may not misrepresent themselves or impersonate others. • This applies to both reviews submitted by legitimate travellers that may contain false or misleading information as well as reviews submitted by individuals that intend to circumvent our controls by posting reviews without making use of the service subject to the review. • We use machine learning models to detect such reviews, we conduct investigations into suspected violations of our policies and have put in place restrictions around who can submit reviews. • We offer the opportunity for supply partners to proactively challenge reviews that may not seem accurate.
3.	<p>Risk that:</p> <p>(i) child sexual abuse material (CSAM) / sexual exploitation material may be available on the platform; and</p> <p>(ii) the platform may be used for the sharing of illegal non-consensual private images.</p>	2	<ul style="list-style-type: none"> • Our Content Standards and Guidelines (including our content moderation policy) prohibits content that contains sexually explicit material including content that sexually exploits children or presents them in a sexual manner. We also prohibit content that is deemed legally restricted based on local laws or content that is obscene, offensive or not appropriate for all audiences. • We have automated detection mechanisms to moderate images uploaded by travellers and supply partners containing nudity and images that are sexual in nature. Photos uploaded by travellers are pre-moderated. • We have a process in place to always treat CSAM with the highest priority should it occur. The relevant teams are trained to recognize and escalate

			<p>suspected cases of (child) sexual abuse violations and to take appropriate action.</p>
4.	Risk of abuse or misuse of the service for human trafficking	2	<ul style="list-style-type: none"> • Our Human Rights Statement articulates our commitment and approach to respecting and promoting human rights and our Modern Slavery Statement (updated in 2024) sets out actions taken by us to prevent modern slavery. • We have processes in place to mitigate human trafficking risks focused on accommodation providers - including internal human trafficking prevention guidelines, internal and external training and awareness raising efforts, and content moderation guidelines and controls over information that is included in the promotion of service listings on Booking.com. • Our travellers and supply partners can raise complaints via various channels including our Customer Service or via the Compliance helpline reporting function. Supply partners may also report cases via the guest misconduct reporting system. • Any report of human trafficking or sexual exploitation will be escalated to the Trust and Safety team and will be investigated, following which appropriate action will be taken (e.g. blocklisting or disabling partner or guest accounts). This may also include reporting cases to law enforcement. • We have also conducted a company-wide assessment related to human trafficking to help us identify modern slavery risks across our value chain and in our industry, and understand potential effective mitigations. Ongoing work is being done to further implement mitigation and remediation strategies based on the conclusions and recommendations made in the assessments. • Our Customer Service, Partner Service and Trust and Safety teams are trained to recognize and timely act upon suspected human trafficking

			<p>cases and our Trust and Safety guidelines for the identification of trafficking risks were improved in 2024.</p> <ul style="list-style-type: none"> • We also provide training to supply partners to promote awareness and help detect cases of human trafficking at properties. For instance, in the past year, we have developed training in collaboration with PACT – Protect All Children from Trafficking (formerly ECPAT-USA) for supply partners. • Booking.com has for years been a partner of the Code of Conduct for the protection of Children from Sexual Exploitation in Travel and Tourism, a multi-stakeholder initiative with the mission to provide awareness and support to the tourism industry to prevent sexual exploitation of children. • We offer various materials and resources to supply partners in the Partner Hub including articles on the detection of human trafficking as well as on identifying and acting on potential human trafficking of refugees from Ukraine (published in December 2023 and May 2024 respectively). • In July 2024, we also partnered on a campaign with It's a Penalty, a coalition of travel industry companies and NGOs to raise awareness and provide educational resources to fight human trafficking during the Paris Olympics and Paralympics. As Headline Sponsor of the campaign, we helped raise awareness across in-flight videos, billboards, posters, external media, internal awareness, as well as sharing resources with our travel service partners in France and Belgium. • We engage with certain law enforcement authorities to enhance our understanding of human trafficking risks for online travel agencies.
5.	Risk of data breaches	2	<ul style="list-style-type: none"> • Travellers and supply partners only provide limited personal data that is necessary to complete transactions on the platform.

		<ul style="list-style-type: none">• Our Privacy Statement informs users of the kind of data that Booking.com collects and the security and retention procedures we have in place to safeguard personal data.• We regularly enhance our defences against cyber attacks and online fraud attempts by leveraging industry best practices and technologies and have a dedicated team of cyber security professionals led by our Chief Information Security Officer.• We maintain an extensive array of technical and organisational measures to limit the likelihood of data incidents and impact to customers and other data subjects should such data incidents occur. This includes, but is not limited to, measures such as threat and vulnerability management, network security and application access control, strong authentication, logging and monitoring as well as data leakage prevention, the use of tokenization and documented incident management and data breach management program protocols. Furthermore, we continue to invest in a Security Operations function, which has been staffed with security professionals, data scientists, and product and engineering resources. This team focuses specifically on detecting, monitoring, investigating and remediating traveller and supply partner account take-overs.• We maintain measures to prevent and detect traveller and supply partner account take-overs, including multi-factor authentication (MFA), automated reporting channels and by working with and providing education and awareness to supply partners and travellers on identifying potential attacks, in our Safety Resource Center, Partner Portal and on vulnerable end-points (e.g. messaging interfaces). In the event that a supply partner's account is potentially compromised and reported to Booking.com's Security & Fraud team, the account is blocked, requiring a password reset. Furthermore, we have implemented measures which limit the impact of a supply partner account take-over. For example, automated
--	--	--

			<p>phishing message detection can intercept fraudulent messages to travellers, based on known malicious text or URLs.</p> <ul style="list-style-type: none"> • Our terms and conditions with third parties (including supply partners) with whom traveller data is shared include contractual obligations to take measures to prevent phishing, keep their account login credentials confidential and preserve protection of such data.
6.	Risk of unnecessary or disproportionate government data requests	2	<ul style="list-style-type: none"> • Before any request for traveller or supply partner data from government authorities is processed, our dedicated and experienced team confirms and validates the authenticity of the requesting authority against lists of authorities in the EU provided by Europol as well as the grounds for the request. • We reject requests that cannot be confirmed as legitimate, necessary and proportionate and have detailed guidelines to ensure consistent validation of authorities, verification of requests, and follow-up. • Requests are received and assessed through a dedicated portal with authentication, which prevents unauthorised access and ensures only qualified team members can view requests and follow-up. • When access to data is granted, it is available to the authorities for a limited amount of time only, with automated reminders being sent before access expires. Authorities are also required to use a two-authentication factors system to connect to the Booking.com portal.
7.	Risk that: (i) the platform may be used for the sharing of highly personal information of users;	2	<ul style="list-style-type: none"> • Our Customer Terms of Service and Content Standards and Guidelines prohibit conduct/content that infringes on the privacy rights of any users. • Our Guest review removal conditions make clear that Booking.com will not accept any reviews that contain unauthorised information relating to an identified or identifiable natural person. • We have content moderation policies and we use a combination of

	(ii) personally identifiable information about a child may become available on the platform		<p>automated systems and human review to address the risk of sharing highly personal information of users.</p> <ul style="list-style-type: none"> • Our Customer Terms of Service require users to be at least 18 years of age to use the platform. • Very little personally identifiable information on children (e.g., names of room occupants or date of birth when required for flight reservations) is collected by Booking.com. • Our policies also prohibit unauthorised photographs of young children from being posted where the child is identifiable (e.g., where their face is visible).
8.	Risks that the platform and its recommender systems may use personal data / aggregated personal data in a way that is not necessary for the stated purpose in the Privacy notices or in a way that could result in unjustified discrimination		<ul style="list-style-type: none"> • Our user Privacy Statement and the “How we work” section on our website describes the types of personal data collected and how it is used by Booking.com. • We do not intentionally collect special categories of personal data (such as racial and ethnic origin, sexual orientation etc., as defined under the GDPR) for use in our recommender systems. • In instances where we may use profiling (as defined under the GDPR) in a recommender system, the user is given the option to opt-out of personalised recommendations. This means the user will view service recommendations without our recommender systems using profiling.
9.	Risk that content moderation systems may perform less optimally in certain languages potentially resulting in over / under removal of harmful content	2	<ul style="list-style-type: none"> • Our content moderation processes previously utilised machine learning models in 43 different languages to detect inappropriate content. Today, our automated content moderation processes cover 140 languages and we have human moderators that speak almost all languages used on the platform. • We use sophisticated automated translations tools that account for

			<p>colloquialisms for any other language not covered.</p> <ul style="list-style-type: none"> • We are working on improving the quality of translations for images and text reviews and expanding our lists of offensive keywords to languages other than English.
10.	Risk of harmful misuse of the service by minors	2	<ul style="list-style-type: none"> • Our Customer Terms of Service which apply to EU users require users to be at least 18 years old to use the platform. • In order to access many of our services, a credit card or other form of online payment method is required to make a reservation which are generally only accessible to persons above the age of 18 in the EU. • Our Content Standards and Guidelines are designed to ensure that content displayed on the platform is restricted to travel-related topics thus reducing the risk of exposure to harmful content. • In addition, incidents escalated to our Trust and Safety team involving minors are treated with the highest priority in order to mitigate misuse of the platform by minors or any potential resulting harm.
11.	Risk that harmful (but legal) content on the platform may impact well-being of users	2	<ul style="list-style-type: none"> • Our Customer Terms of Service do not allow inappropriate behaviour (e.g., violence, threats or invasion of privacy) and our content moderation policies and guidelines prohibit content that promotes or facilitates serious physical or mental health violence against others. The guidelines also specifically condemn content that harasses, bullies or threatens others or is obscene or offensive or shocking. • We address this risk primarily through our automated content moderation systems (e.g. Machine Learning classifiers) and as stated previously, we offer various avenues for reporting such content where it is not captured by our systems.

12.	Risk that intellectual property may be illegally available on the platform	3	<ul style="list-style-type: none"> ● Our Content Standards and Guidelines provide that we respect intellectual property rights and expect our travellers and supply partners to do the same. ● We review cases of notified intellectual property infringements and act to remove instances of (suspected) infringing content. Where appropriate, we take further action against (repeat) violators (e.g. disabling accounts, restricting access etc.). ● Our content moderators are trained on the fundamentals of intellectual property, privacy and confidential data and we have an internal process in place and a shared inbox to receive and follow-up on any notices involving alleged intellectual property infringements.
13.	Risk that content on the platform may constitute illegal defamation	3	<ul style="list-style-type: none"> ● Our Customer Terms of Service do not allow inappropriate behaviour on the platform (e.g., violence, threats or invasion of privacy). ● Our content moderation policy also prohibits potentially defamatory statements against individuals. ● Our content moderation systems flag potentially inappropriate content for manual review by picking up on blocklisted words and with the use of machine learning capabilities. ● Given the complex and fact-specific nature of defamation, our content moderators are trained to recognize what might constitute illegal defamation.
14.	Risk that content on the platform may promote sale of illegal products and services (e.g. drugs, gambling, underage drinking)	3	<ul style="list-style-type: none"> ● Our Content Standards and Guidelines prohibit content that is illegal or otherwise restricted under local laws, including content that offers, sells, advertises or facilitates the sale of regulated or restricted goods and services. ● Our guest review removal conditions stipulate that reviews promoting, supporting or inciting illegal activities will not be made available on the

			<p>platform and our content moderation policy prohibits such content. We enforce this prohibition regardless of whether those activities are in fact illegal in the location where the service is offered.</p> <ul style="list-style-type: none"> • We have also enhanced our moderation of partner photos post-publication (the most relevant type of content for this risk) which increases the chance that any such content will be detected by our systems. • Our content moderators are trained and can recognize what constitutes an illegal product and/or service being offered.
15.	Risk that content relating to war crimes, genocide or crimes against humanity may be available on the platform	3	<i>N/a given that this risk has been removed as a result of our 2024 results because it was found to be insufficiently material.</i>
16.	Risk that content on the platform may be unjustifiably removed and risk that users are not able to appeal content removals and/or report or appeal potentially violating content	3	<ul style="list-style-type: none"> • Our Content Standards and Guidelines make clear which type of content is prohibited and provide information on how travellers and supply partners can report content and appeal content removal decisions. As discussed in section 2, we have expanded our mechanisms for reporting illegal content and appealing content moderation decisions as part of our DSA compliance efforts. • We also offer various other channels to report illegal content and challenge moderation decisions. For instance, if a supply partner's account is suspended, the partner concerned will automatically receive a notification that allows it to trigger a process for re-opening if a valid rationale is provided • Our Customer Service and Partner Service agents are also being trained to increase overall awareness on our content moderation and appeal processes.

17.	Risk that the platform may be used for the purposes of stalking	3	<i>N/a given that this risk has been removed as a result of our 2024 results because it was found to be insufficiently material.</i>
18.	Risk that services or features on the platform may not function equitably for users with certain disabilities or limited digital literacy	3	<ul style="list-style-type: none"> • Our Customer Terms of Service outline accessibility features on the platform and our Customer Service team enables accessibility requests to cater for the needs of those with disabilities and digital literacy challenges. • We provide options for users of the Booking.com service to identify their preference for seeing listings with accessibility criteria. • We have standardised design tools and reusable interface elements available that take into account accessibility standards. • We have and will continue to educate Product teams at booking.com on accessibility practices and ways to build products with accessibility standards in mind.
19.	Risk that platform features (e.g. Customer Service support) may provide inconsistent experience to users across different languages and markets	3	<i>N/a given that this risk has been removed as a result of our 2024 results because it was found to be insufficiently material.</i>
20.	Risk that geo-pricing on the platform may result in unjustified discrimination	3	<ul style="list-style-type: none"> • Customers located in the European Economic Area (EEA) have access to the same prices and conditions on Booking.com. • Booking.com supply partners located in the EEA are not allowed to set up domestic or international country rates using geo-pricing. • Supply partners outside the EEA are also required to treat the EEA as a single market and are thus not allowed to set up a country rate for a specific country within the EEA.

21.	Risk that content is available on the platform that glorifies or encourages eating disorders, self harm, or suicide	3	<i>N/a given that this risk has been removed as a result of our 2024 results because it was found to be insufficiently material.</i>
-----	---	---	--

Conclusion

As noted at the outset of this document, our 2023 risk assessment showed that the design and functioning of Booking.com does not pose significant systemic risks to EU citizens because of the nature of our service and our history of continuously assessing and mitigating risks to society. The results of our 2023 systemic risk assessment as well as insights from our business have guided our efforts to enhance the safety and integrity of our platform. We have collaborated closely with key stakeholder groups within the organisation, leveraging their expertise and insights to design and implement the measures effectively and have diligently tracked the completion of these initiatives throughout the year.

Our efforts have been successful in reducing our overall risk profile. As confirmed by our 2024 risk assessment, seven risks, including the single risk identified as Tier 1 in our 2023 assessment, have decreased either in Tier or in probability of the risks materialising on the platform. In addition, a number of risks have been removed as they were found to be insufficiently material.

In all, the risks identified in the 2023 assessment are mitigated by:

- our existing safety features ranging from content moderation technology and proficiencies to our trust and safety program;
- measures we have implemented to comply with DSA obligations. By adhering to the DSA's requirements, we have enhanced the safety and transparency of the platform. These measures have directly addressed key areas of attention for the systemic risk assessment, such as illegal content and user safety; and
- additional measures implemented since August 2023. To name a few examples, we have expanded our content moderation processes to cover 140 languages and our human moderators speak almost all languages used on the platform. In addition to other content, photos uploaded by both travellers and supply partners are moderated through our automated content moderation systems combined with human review. Furthermore, we provide training internally and externally to raise awareness on a number of risks we have identified and we expanded our strategic partnership with global human rights organisations.

Booking.com remains committed to continuously enhancing the integrity and safety of our platform for all users and to contributing to the overall integrity of our industry.