

Airbnb Code of Ethics



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



Table of Contents

<u>Introduction</u>	4
<u>21st Century Stakeholder Principles</u>	4
<u>Belonging is Everyone’s Responsibility.</u>	5
<u>Respectful Relationships</u>	7
<u>Safety & Security</u>	10
<u>Waivers</u>	16
<u>Final Note</u>	16



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 our values. It clarifies expectations around our behavior and reinforces our shared responsibility for this incredible Airbnb community. The Code of Ethics applies to all employees, officers and directors of Airbnb, Inc. and its subsidiaries. Translated versions of the Code of Ethics are available at [air/ethics](https://air.com/ethics). In addition to the Code of Ethics, we also have policies and guidelines (and in certain countries, Employee Handbooks and local legal requirements) that outline our responsibilities to each other. In several places, the Code of Ethics refers to specific policies.

21st Century Stakeholder Principles

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 Stakeholder Principles.



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 Airbnb employee is expected to understand the requirements described in the Code of Ethics. Before you make a work-related decision or take action, think about the Core Values, Stakeholder Principles and the Code of Ethics. Ask yourself the following questions. If the answer to any of the questions below is "No" or "I don't know," your decision or action is probably inappropriate:

- 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 Core Values?

- In significant decisions, have I considered the impact of this action on each of the five stakeholders?
- Will this action seem appropriate to others?
- Would your coworkers be embarrassed or compromised if this action were to become known within Airbnb or publicly?

The best way to safeguard our 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.

The Code of Ethics can't clarify every real life dilemma, so we have Airbnb Ethics Advisors — trustworthy, responsible employee advisors who received specialized ethics training and can help when you aren't sure how to handle a particular situation. Ethics Advisors can also receive reports of potential Code of Ethics violations. Email them at ethics@airbnb.com.



Company Responsibilities.

Airbnb will resolve employee questions, concerns and reports with sensitivity and respect for employee confidentiality to the greatest extent possible. Consequences of 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.

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 area of responsibility. If you don't understand a particular law or regulation or if you are not sure it applies to you, ask a member of the Legal team for help.

Reporting and Responses to Concerns.

We are committed to responding to employee concerns, complaints and reports. So, please speak up! If you see, hear or learn of inappropriate behavior, share your concerns. There are many ways to report issues. Tell any manager, Talent Partner, member of the Legal team or Ethics Advisor, all of whom have an obligation to report any violations they are informed of or witness directly. Or submit a report through our Ethics Hotline at airbnbethics.com or through Vault. You may even report your concerns anonymously. Please review our Whistleblower Policy for more information.

We will thoroughly, promptly and impartially examine and address every report of a violation of the Code of Ethics. We will take appropriate steps to maintain confidentiality, though we cannot guarantee absolute confidentiality or anonymity. Employees are required to cooperate with investigations conducted by Airbnb by providing truthful and complete responses to investigators.

When claims are substantiated in whole or in part, we will take appropriate action, from training and coaching, to warnings, to employment termination or termination of any other business relationship.

We Prohibit Retaliation.

It is a violation of this Code to retaliate against anyone because they reported a concern, they helped someone else report a concern, they participated in an investigation, they exercised a legal right or they acted according to a company policy. If you suspect retaliation or have any questions about retaliation, please let us know. Reach out to any manager, a Talent Partner, member of the Legal team, an Ethics Advisor or report a concern at airbnbethics.com.



Respectful Relationships

Belonging is a concept that defines Airbnb and every employee in every country should experience and express it. Because all belonging begins with respect, these policies outline the minimum expectations for respectful interactions at work.

We Promote Diversity, Inclusion & 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 without regard to characteristics and statuses protected by country, regional or local laws. Protected characteristics and statuses around the world include such things as: race, religion, national origin, social condition, criminal record, citizenship, culture, color, gender, gender identity, gender expression, genetic characteristics, age, disability, medical condition, pregnancy, marital status, military status, civil status, HIV status and sexual orientation.

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 the employment relationship — from recruitment and hiring, compensation, performance evaluations, project assignments, training opportunities, promotions, to the end of employment.

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

We Do Not Tolerate Harassment or Bullying.

We're all hosts at Airbnb. We're open-minded, respectful and hospitable. We're committed to and look out for each other. Harassment, discrimination and bullying are incompatible with our values and are not tolerated. Our Anti-Harassment, Discrimination & Retaliation Policy explains how we ensure that our place of work is free of all forms of harassment, discrimination, bullying and retaliation.

What We Expect.

We expect managers to maintain a healthy, inclusive work environment — where bullying, discrimination and harassment are never tolerated.

Managers may not have Personal Relationships (an ongoing or past romantic or intimate relationship) which are in violation of the Anti-Harassment, Discrimination & Retaliation Policy or Conflicts of Interest Policy.



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 free is from bullying, discrimination and harassment.

We Accommodate (or Make Adjustments for) Physical or Mental Differences.

Consistent with our commitment to diversity, inclusion and equal employment opportunity, we provide reasonable accommodations to disabled applicants and employees. Specific policies and practices may vary by region and local rules, so please check our Accommodation Policy or contact Talent Operations or your Talent Partner if you have questions.

When We Say “Mandatory,” We Mean It.

We offer several mandatory trainings on topics including harassment, discrimination and others. All employees globally are required to complete harassment prevention training. These mandatory trainings will be assigned to you and your Employee Handbook may outline the specific mandatory trainings that apply to you. Failure to complete these trainings by their assigned deadlines can result in employee discipline leading up to and including termination of your employment.

We are Exemplary Guests & Hosts.

We are proud to have so many employees who are champions of Airbnb’s mission, not just at work, but also as Homes and Experiences hosts and as Airbnb guests. As an employee, you literally represent Airbnb and its values in our community. This is a significant responsibility. We expect every employee host to comply with local laws, including short-term rental regulations. And as a guest or a host, we expect every employee to be an exemplary member of the Airbnb community. Whether hosting or traveling for business or leisure, an exemplary guest or host always follows the rules of the listing and our Community Standards, Party and Events Policy, Host Reliability Standards and Guest Reliability Standards. Violation of these standards may result in disciplinary action up to and including employment termination.

We are Responsible With Alcohol & Drugs.

Our work environment reflects our hospitality. We offer many ways to build community — comfy sofas, board games, ping pong, music, a theater and good food and drink — to name a few. We respect you and trust you to use good judgment. We are committed to ensuring that drugs and alcohol never compromise employee, guest or community safety and security.



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, member of the Legal team, an Ethics Advisor or the Security team. In addition, if you require a medical accommodation involving the above-mentioned substances or similar, please review the Accommodation Policy or contact Talent Operations or your Talent Partner with any questions.

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. Whenever co-workers gather, we expect you to treat it like a work setting, even after-hours or off-site. 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).

Responding to Drug and/or Alcohol Problems.

If you struggle with addiction, we want you to get help. If you think you have a drug or alcohol-related problem, take advantage of Airbnb's Employee Assistance Program ("EAP") to get medical and psychological help for addiction. We also offer leaves of absence to employees who need time off from work to participate in drug or alcohol rehabilitation programs to the extent appropriate and consistent with applicable law. We will respond appropriately to drug and alcohol-related misconduct, so if you have a problem, get help before alcohol or drugs interfere with your work.



Safety & Security

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 Monitor Our Workplace to Keep Everyone Safe & 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 (things that could hide illegal drugs, weapons, stolen property or other inappropriate material). Of course, we will consider and comply with local and regional laws that regulate employee safety, security and privacy.

We are Serious About Physical Security.

Per our Safety and Security 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 tell a member of the Safety and Security team right away if a badge is lost, stolen or misplaced.

We Take Steps to Reduce the Risk of and Respond to, Workplace Threats & Violence.

Nothing is more important than the safety of our community, so we strictly prohibit violence and threats of violence. Examples include 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.



We Prioritize Employee Health & 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. Please promptly report any workplace health or safety issue, concern or incident to AirSecurity by calling +1(415) 728-0104 or by emailing airsecurity@airbnb.com. Employees can also report workplace safety and health concerns or hazards here and must promptly report all work-related injuries and illnesses here.

We Respect & Protect the Privacy of Personal Information.

Airbnb wouldn't exist without the trust of our hosts and guests. We maintain this trust by restricting access to personal information of hosts and guests to employees with a business reason to use it and by asking that our employees take steps to protect against unauthorized use or release of this information.

For your protection and the privacy of our community, don't access or try to access personal information of hosts and guests unless you need it to do your job. For example, don't use system access rights to check out a friend or celebrity's account or to look at the account of a host with whom you will be staying, even for a business trip. When you travel for work or pleasure on Airbnb, you should be in the same position as a non-employee guest. We regularly monitor employee access and will not hesitate to terminate any employee who abuses his or her administrative access privileges.

We Protect Airbnb's Intellectual Property & Confidential Information.

For our community to keep thriving, we must protect our intellectual property and confidential information. We should take all steps and precautions necessary to restrict access to and secure intellectual property or confidential information by, among other things:

- 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);
- 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;



- safeguarding laptop computers, mobile devices, tablets, memory sticks and other items that contain confidential information, including complying with Airbnb’s information technology policies to prevent unauthorized access to devices and/or electronic information to which you have access; and
- avoiding the discussion of material, non-public information in places where the information could be overheard by others such as in elevators, restrooms, hallways, restaurants, airplanes or taxicabs.

Those who are involved with material, nonpublic information, to the extent feasible, should conduct their business and activities in areas separate from other Airbnb activities.

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

In addition, at Airbnb you also are absolutely prohibited 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 of others and may not make unauthorized copies or incorporate it into your own work.

For more information on protecting confidential information and IP, please review your Employee Invention Assignment and Confidentiality Agreement.

We Understand the Importance of Information Security.

At Airbnb, we maintain the security of our IT systems. The Policies for Information Security and Privacy at Airbnb contain important information about company IT security and data privacy expectations and requirements, including how to fulfill these expectations and requirements when working in public places or traveling. You must review, understand and commit to following these policies.

We do not Engage in Insider Trading.

Insider trading occurs when a person purchases or sells a security while in possession of material nonpublic information. 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 for more information.

Speaking to the Press or Public.

Per Airbnb’s Press and Speaker Guidelines, you must obtain approval from the Communications Team before making any statements on behalf of or as a representative of Airbnb (including “off the record,” “background” or “not for attribution” comments) to journalists, bloggers, influencers, industry analysts, investors or otherwise through any public forum, panel or public speaking engagement. If you inadvertently make a comment without obtaining advanced approval from the Communications Team, you must report any such statements to contact.press@airbnb.com.



We Cooperate with Government Inquiries.

We may receive inquiries from government agencies. If you are contacted by a government agency, seek advice from the Legal Department before responding.

We Maintain Business Records Responsibly.

We follow legal and business rules that relate to written and electronic business records. We maintain accurate books and records and do not 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 to legal@airbnb.com if you have questions about documents or information subject to a Legal Hold.

We Comply With the Office of Foreign Assets Control Sanctions.

The U.S. Office of Foreign Assets Control (“OFAC”) administers and enforces economic and trade sanctions programs based on U.S. foreign policy and national security goals against targeted foreign countries and regimes and groups of individuals such as terrorists, narcotics traffickers and those engaged in threats to the national security, foreign policy or economy of the United States. The regulations prohibit conducting or facilitating business with “Specially Designated Nationals” and certain countries. They are complex and change regularly. Ask the Payments Compliance team before you conduct Airbnb business that may raise an OFAC compliance issue.

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 read and understand the Global Anti-Bribery & Corruption Policy. If you have any questions regarding the Anti-Bribery & Corruption Policy, please contact the Ethics & Compliance team at abc@airbnb.com.



We Recognize & Avoid Conflicts of Interest.

A conflict of interest develops when personal loyalties or interests are or seem to be, at odds with company interests. Relationships, financial interests, outside activities and receiving gifts or entertainment from vendors, suppliers and partners can lead to the appearance of a conflict of interest. The appearance of 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. Review our Conflicts of Interest Policy and Related Person Transaction Policy for more information on how we manage potential conflicts of interest.

We do not Make Corporate Loans or Guarantees.

Federal law prohibits the Company to make loans and guarantees of obligations to directors, executive officers and members of their immediate families.

We Interact Responsibly on Social Media.

Members of our community are accountable for what they do and say on social media. The Airbnb Social Media Guidelines is our resource for employees. Read it carefully and ensure you act consistent with it when engaging on social media.

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 faces political challenges in various places, and sometimes engages in the political process by making contributions to support candidates and support and oppose ballot measures. The laws regarding corporate political contributions are complex and vary from city to city, state to state and country to country. To minimize mistakes, only the Chief Legal Officer and the Head of Global Policy and Public Affairs and certain individuals they designate, have the authority to approve political contributions on behalf of Airbnb. 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:

- do not make false claims about our competitors' products and services, as well as our own;
- avoid making formal or informal agreements to unfairly restrict competition;
- honor the confidentiality of our competitors' trade secrets;
- develop and implement our business strategies independently; and
- succeed because of our great people, our compelling vision, the quality of our product and our superior marketing.

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 our business. Do not seek competitor information unless it is reasonable and lawful to have or use the information.

Competitive information includes anything related to the competitive environment or to a competitor's products, services, markets and pricing or business plans. Legitimate sources of competitive information include publicly available news accounts, industry surveys, competitors' displays at conferences and trade shows and information publicly available on the Internet. It is also acceptable to get competitive information by obtaining a license to use the information or purchasing ownership of the information.

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 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 includes proprietary information that was copied, drawn or photographed without the owner's permission;
- it was obtained in exchange for compensation, employment considerations, gifts or anything else of value;
- it is sent to you in an unsolicited communication from a supplier, partner or other third party;
- it was solicited from a new hire and is about his/her former employer; or
- it contains 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.



Waivers

Any waiver of this Code of Ethics for the Company'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. If you see, hear or learn about a possible violation of the Code of Ethics, please tell someone: an Ethics Advisor, any manager or Talent Partner — or report your concern on airnbethics.com.

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.