

Code of Business Conduct and Ethics

Who?

This policy has been created for trivago N.V. and all its subsidiaries, which we refer to in this Code as “we,” “us,” or “trivago”. It applies to all our employees, including the members of our management and supervisory boards. We expect all our agents, consultants and business partners to comply with this Code when providing services to trivago.

What?

We created this Code to show our commitment not only to always complying with the law but also to acting in accordance with high ethical standards. We want to maintain and foster our reputation for honest and straightforward business dealings.

This Code is a statement of certain fundamental principles that apply to our employees’ conduct of our business. We may provide further guidance regarding the standards in this Code through special guidelines or policies, which include, for example, our Culture Code and may relate to specific areas of our business.

All our employees are expected to read and understand this Code and our policies, uphold these standards in our daily business and take personal responsibility for their compliance with them. You can find this Code on Knowledge and it will also be posted on the trivago website. Legal can answer any questions you might have. Don’t hesitate to get in touch!

A violation of this Code might lead to disciplinary action, including termination. If you are aware of any situation that you believe may violate or lead to a violation of it, please follow the guidelines below (point 14). This Code is not intended to and does not create any rights in favor of any employee, customer, client, visitor, supplier, competitor, shareholder or any other person or entity.

1. Honest, lawful and ethical conduct

This Code describes honest, lawful and ethical conduct in general terms. It does not cover every issue that might come up, but instead gives basic principles for you to follow.

We require all our employees to be honest and lawful at all times and maintain high ethical and professional standards when they act for trivago. Our employees must respect the rights of others, maintain their duty of loyalty to trivago and keep our best interests in mind. This includes protecting our assets and property, including hardware and our campus interior and using them only for legitimate business purposes. We do not tolerate any theft, carelessness or waste.

We want each employee to endeavor to deal fairly with our customers, service providers, suppliers, competitors and colleagues. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of material facts, or any unfair dealing practice.

2. Conflicts of interest

Our employees owe a duty to trivago to advance its legitimate interests when the opportunity to do so arises. A “conflict of interest” exists when:

- your interests improperly interfere, or appear to interfere, with the interests of trivago and,
- in the case of a member of our management or supervisory board, when he or she has a direct or indirect personal interest which conflicts with the interests of trivago N.V. and its subsidiaries.

You should avoid any situation where your actions or your interests make it difficult to perform your work for trivago objectively and effectively. A conflict of interest may arise if you, or any member of your family, receives improper personal benefits because of your position in trivago. We require our employees to be responsible for recognizing and avoiding any situation involving a conflict of interest. You should strive to avoid even the appearance of a conflict of interest. Our employees are prohibited from associations or investment interests that interfere, might interfere or might appear to interfere with the independent exercise of judgment in trivago’s best interests.

Our employees are responsible for taking appropriate action to eliminate or prevent any conflict or appearance of a conflict, including reporting the situation to the appropriate level of management.

We respect your privacy and right to engage in outside activities so long as they:

- do not conflict with our interests,
- do not interfere with your performance of your duties on behalf of us, and
- do not reflect poorly on trivago.

We nonetheless maintain our right and obligation to determine whether conflicts of interest exist and to take appropriate action to address them.

Before engaging directly or indirectly in any transaction or relationship that reasonably could give rise to an actual or apparent conflict of interest:

- Members of the supervisory and management boards must provide a full and fair disclosure of all relevant facts and circumstances in accordance with their respective internal rules, such that the actual or apparent conflict of interest can be dealt with in accordance with the relevant provisions of such internal rules.
- Our employees must provide a full and fair disclosure of all relevant facts and circumstances to Legal.

Conflicts of interest can also occur indirectly. If you or your spouse or other close family member works for a firm that does business with or competes against trivago, Legal should be advised of the situation in writing. Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with Legal.

Our employees are prohibited from directly or indirectly:

- taking personally for themselves opportunities that are discovered through the use of trivago’s property, information or positions;
- using trivago’s property, information or positions for personal gain; or

- competing with trivago for business opportunities.

If our management board determines that trivago will not pursue an opportunity that relates to trivago's business, you may do so, but only after notifying the management board of your intended actions in order to avoid any appearance of a conflict of interest. If a supervisory or management board member intends to pursue such an opportunity, the supervisory board must make such determination and be notified accordingly.

3. Compliance with laws, regulations and rules

Compliance with the law is the foundation on which trivago's ethical standards are built. It is trivago's policy to be a good "corporate citizen". All our employees must comply with the laws, regulations, rules and regulatory orders that are applicable to our business. This includes anti-corruption laws, securities laws and other fair trading and competition laws. trivago expects you to have an appropriate knowledge of the laws relating to your duties at trivago to enable you to identify potential issues or violations and to know when to ask Legal in case you are not sure about the requirements.

If a law conflicts with any of the trivago policies or this Code, you must comply with the law.

Our management board (including the members thereof performing the principal executive officer, principal financial officer and principal accounting officer roles or persons performing similar functions) is also required to promote compliance by all our employees with this Code and to abide by our standards, policies and procedures.

4. Insider trading

Trading on inside information is a violation of securities law. Employees in possession of material non-public information about trivago or companies with whom we do business must abstain from trading or advising others to trade in the respective company's securities until an adequate public disclosure is made. Material information is information of such importance that it can be expected to affect the judgment of investors as to whether or not to buy, sell, or hold the securities in question. To use non-public information for personal financial benefit or to "tip" others, including family members, who might make an investment decision based on this information is not only unethical but also illegal.

All employees are required to read and familiarize themselves with the "trivago Securities Trading Policy." Additional copies of the policy can also be obtained from trivago's internal website or Legal. If you should have further questions in this area, please consult Legal.

5. Disclosure, Financial Reporting and Accounting

We are committed to establishing and maintaining effective internal controls, as well as best practices in accounting and financial reporting. We are further committed to providing full, fair, accurate, timely and understandable disclosure in all reports and documents filed with or submitted to the Securities and Exchange Commission ("SEC") and in all other of our public communications. To ensure we meet this standard, all employees involved in our disclosure process are required to maintain familiarity with the disclosure requirements, processes and procedures applicable to trivago commensurate with their duties. Employees are prohibited from knowingly misrepresenting, omitting or causing others to

misrepresent or omit, material facts about trivago to others, including trivago's independent registered public accountants, governmental regulators and self-regulatory organizations.

All of our books, records, accounts and financial statements must be maintained in reasonable detail, must accurately reflect trivago's transactions and must conform both to applicable legal requirements and to our system of internal controls. Unrecorded or "off the books" funds or assets should not be maintained unless permitted by applicable law or regulation and brought to the attention of the Chief Financial Officer. Employees are required to cooperate fully with internal and independent auditors during audits of trivago's books, records and operations.

Any employee who learns of any material information affecting or potentially affecting the accuracy or adequacy of the disclosures made by trivago in its SEC filings or other public statements shall bring the matter promptly to the attention of a member of our disclosure committee.

Any employee who learns of information concerning (i) significant deficiencies or material weaknesses in the design or operation of internal controls that could adversely affect trivago's ability to record, process, summarize and report financial data accurately, or (ii) any fraud, whether or not material, involving management or other employees who have a significant role in trivago's financial reporting, disclosures or internal controls shall bring the matter promptly to the attention of the Chief Financial Officer (or, if the fraud concerns a member of the management board or the supervisory board, to the attention of the full supervisory board).

6. Economic Sanctions

We conduct our business activities globally. We and our employees comply fully with all applicable laws and regulations, including those pertaining to economic or financial sanctions.

We take our obligation to comply with sanctions seriously. Violations of sanctions may lead to significant civil and criminal penalties for entities and individuals as well as damage to our reputation. We expect all our businesses, and their respective directors, officers, employees, consultants, contract workers, temporary staff and other personnel to take responsibility for compliance with sanctions.

All our employees are required to read and familiarize themselves with the "trivago Economic Sanctions Compliance Policy." Copies of the policy can be obtained from trivago's internal website or Legal. If you should have further questions in this area, please consult Legal.

7. Anti-Corruption

We are committed to doing business legally, ethically, and professionally, worldwide. It is our policy to comply with all anti-corruption laws that apply to our operations, including the U.S. Foreign Corrupt Practices Act, as amended, the German Criminal Code (in particular Sec. 331 et seq. and Sec. 299 et seq.), the UK Bribery Act 2010, and the laws of the countries where we do business. We value integrity and transparency and prohibit corrupt practices in all business dealings, both in the private and government sectors.

All employees are required to read and familiarize themselves with the "trivago Global Anti-Corruption Policy." Copies of the policy can be obtained from trivago's internal website or Legal. If you should have further questions in this area, please consult Legal.

8. Tax Evasion

Evading taxes and deliberately and dishonestly assisting someone else to evade taxes is an offence in most countries with potentially significant fines and/or imprisonment being imposed on the tax evader and/or the facilitator. In some countries, companies also face criminal exposure where tax evasion is facilitated by persons working for and on behalf of them anywhere in the world.

We are committed to ensuring that tax evasion and the facilitation of tax evasion offences are not being committed by our staff or third parties during the conduct of our business. Therefore, you are expected to have the same commitment wherever in the world you are working.

Failure to comply could make trivago criminally liable for the failure to prevent the deliberate and dishonest facilitation of tax evasion and can have severe consequences for trivago and for those with whom we do business.

Should you have a suspicion or concern with regard to tax evasion or facilitation of tax evasion at any time you must report that suspicion or concern immediately, so that the case can be properly investigated. Employees can report such suspicions or concerns to Legal, or alternatively, may do so confidentially and/or anonymously by following the steps set forth in trivago's policy on our Whistleblower Policy, as summarized in Section 14 below.

9. Money Laundering

Money laundering is the process of concealing criminal property or converting it into property that appears legitimate. In some jurisdictions, merely being in possession of criminal property amounts to money laundering, punishable by potentially significant fines and/or imprisonment. The meaning of "criminal property" can also be construed very broadly to mean any benefit from criminal conduct, whether or not monetary. Conducting otherwise legitimate business with a person or business known or suspected to be involved in criminal activity could expose you to money laundering liability.

We are committed to conducting our business with integrity and only working with reputable third parties involved in legitimate business activities. When working with third parties—including, but not limited to agents, independent contractors, consultants, vendors, suppliers, contractors, advertisers, customers, or any other business partners—our employees must be attentive to any warning signs that the third party is involved in illegitimate business or has funds from illegitimate sources. Examples of such warning signs may include:

- requesting that payment be made in an unusual way (e.g. in cash) or to an unrelated country,
- operating in a country with a reputation or history of widespread corruption,
- lacking the qualifications for the task at issue, and
- reluctance to provide complete information.

If you have any suspicions or concerns about a third party or the way that a third-party transaction is being structured, please raise them with Legal immediately.

10. Modern Slavery

Consistent with our commitment to conducting business with high ethical standards and with integrity, trivago has a zero-tolerance approach towards modern slavery both within our own organization and

in our supply chains. Modern slavery is crime and an abuse of fundamental human rights. The term encompasses slavery and servitude, forced or compulsory labor, and human trafficking. Human trafficking involves arranging or facilitating the travel of another person with a view to that person being exploited. We are committed to implementing and enforcing systems and controls aimed at ensuring that modern slavery is not taking place in our business or in our supply chains. We expect our suppliers to hold their own suppliers to the same standards. Using a risk-based approach, we may require third parties to warrant against the use of modern slavery in our contracts with them.

It is the responsibility of all our employees and those working on our behalf to prevent, detect, and report modern slavery in any part of our business or supply chain. Employees must not engage in any activity that may lead to a breach of this policy or fail to report such activity. Should any of our employees have a suspicion or concern with regard to modern slavery at any time they must report that suspicion or concern as soon as possible. Employees can report such suspicions or concerns to Legal, or alternatively, may do so confidentially and/or anonymously by following the steps set forth in trivago's policy on our Whistleblower Policy, as summarized in Section 14 below.

11. Confidentiality

All employees must maintain the confidentiality of confidential information entrusted to them by trivago or its customers or suppliers, except when disclosure is authorized by Legal, required by laws or regulations, or ordinary and necessary in the course of carrying out their responsibilities as an employee of trivago. Confidential information includes all nonpublic information that might be of use to competitors, or harmful to trivago or its customers or suppliers, if disclosed. It also includes information that suppliers and customers have entrusted to us. The obligation to preserve confidential information continues even after employment ends.

12. Waivers of this Code

Any waiver of this Code for our management or supervisory boards can only be made by our supervisory board or a properly authorized committee of the supervisory board. Such a waiver will be promptly disclosed to the shareholders along with the reasons for it, as required by law or as required by the listing rules of Nasdaq.

13. Compliance Procedures

It is very important that we react promptly and consistently to any violations of this Code. However, in some situations it is difficult to know right from wrong. We don't know what kind of situations might come up, but as long as you follow these guidelines, we have a way to approach a new question or problem. Consider the following:

- Make sure you have all the facts. We need to be as informed as possible to make the right decision.
- Ask yourself: What am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense.
- Discuss the problem with your responsibility lead. This is the basic guideline for all situations. In many cases, your manager will be happy and will have the knowledge and background to be able

to help you. Always remember that it is your responsibility lead's responsibility to help you solve problems.

- o Ask first, act later. If you are not sure what to do in any situation, ask for help before you act.

14. Enforcement

trivago is committed to full, prompt and fair enforcement of this Code.

Reporting Violations

If you find out about any actual or potential violation of this Code, please contact a Managing Director or Legal immediately. If a violation concerns a member of our management or supervisory board, the matter should be reported to the full supervisory board. Please note that if you don't report a violation, this might be itself be a violation of this Code.

You can also report potential violations or concerns anonymously, to the extent doing so is consistent with applicable law, regulations and legal proceedings. That means you don't have to have to disclose your name or identity. This is applicable to concerns relating to alleged irregularities of a general, operational or financial nature within trivago's organization, including with respect to accounting, internal accounting controls and auditing matters. Specifically, employees wishing to submit complaints or concerns on a confidential or anonymous basis may communicate with the Company as follows:

- by mail addressed to: trivago, Kesselstraße 5-7, 40221
Dusseldorf, Germany, Attn: Internal
Audit Services
- internal email: whistleblower@trivago.com
- online (anonymous): <https://www.whistleblowerservices.com/trvg/>

Whenever a trivago lawyer learns about a reported violation of this Code that involves a violation of the law (including any violation of the securities laws) or otherwise seems to be very serious, he or she shall immediately inform Legal.

Protection for Reporting Violations

Don't be afraid to speak up! It is a violation of this Code of Ethics, for anyone, including trivago or our employees or agents, to retaliate in any way against you for reporting, in good faith, that a violation of this Code may have occurred or is about to occur. Prohibited forms of retaliation include adverse employment actions (such as termination, suspension and demotion), the creation of a hostile work environment and any other type of reprisal for the good-faith reporting of a possible violation of this Code. If any employee is retaliated against for a report made in good faith of any suspected violation of laws, rules, regulations or this Code, it is cause for appropriate disciplinary action.

Investigating Reports of Violations

Upon receipt of a report of a possible violation of this Code, Legal will promptly initiate an investigation to gather the relevant facts as set forth in our Whistleblower Policy. Legal will then determine whether a violation of this Code has occurred and whether disciplinary action is warranted. Such disciplinary action may include reprimand, termination with cause, and possible civil and criminal prosecution.

Sanctions for Violations

Any violation of this Code may result in serious consequences, such as dismissal, suspension without pay, loss of pay or bonus, loss of benefits or demotion. Depending on the case, the violation may also be reported to the appropriate authorities.