

ORBITZ WORLDWIDE, INC. CODE OF ETHICS AND BUSINESS CONDUCT

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Introduction

At Orbitz Worldwide, Inc., (“Orbitz Worldwide” or the “Company”) we are committed to the highest standards of ethical conduct in the workplace and in all business dealings and operations. We believe strongly in cultivating a work environment that encourages open employee communication, respect for others, and reflects the core principles, morals and values of Orbitz Worldwide. To help achieve these standards, we have introduced this Code of Ethics and Business Conduct. The Code details the Company’s ethical expectations of employees and is the foundation of our Compliance and Ethics Program. The Code supersedes any and all previous codes of conduct and similar documents of Orbitz Worldwide, its subsidiaries and parent companies and their predecessors.

The Code applies to everyone.

The Code is designed to give Orbitz Worldwide employees, Officers and Directors, and contractors a set of ethical and legal guidelines for the workplace. As a global company, we recognize that there are different laws throughout the world, and employees are expected to comply with the Code to the extent that applicable law allows. Please check with your manager, the Compliance & Ethics Department, the Legal Department or contact the Integrity Line if you have any questions. The Code is binding on all Orbitz Worldwide employees and does not, in any way, constitute an employee contract or an assurance of continued employment.

The Code is not intended to cover every situation that might arise, nor will it address every legal requirement. It is intended to help employees make the right decision or ask the right questions. All employees are responsible for knowing, understanding, and complying with the Code. Each new and current Orbitz Worldwide employee will be required to certify annually that she or he has read, understands and will comply with the Code.

Failure to comply may result in disciplinary action, including termination of employment and, in certain instances, referral to appropriate authorities.

For example, disciplinary action may be taken against an employee for any of the following reasons:

- Violation the Code or applicable law, or directing, encouraging or assisting others to do so.
- Deliberately withholding relevant information, or knowingly providing false information, concerning a violation of the Code or applicable law.

- Retaliation, directly or indirectly, against another employee for reporting or investigating a suspected violation of the Code or applicable law.

If you observe or become aware of an actual or potential violation of any law, regulation or provision of the Code, whether committed by Orbitz Worldwide employees or by a contractor or others associated with Orbitz Worldwide, it is your responsibility to report the circumstances in an appropriate manner and cooperate with any investigation that might ensue. The Program is designed to foster open communications and give employees the means to readily report, in good faith and in confidentiality, any potential violation of law or business ethics.

For assistance with compliance and business ethics matters, please contact your supervisor or manager. If she or he is unable to resolve the issue, or if you are uncomfortable discussing the issue with your supervisor or manager, the Compliance & Ethics Department is available to assist you. You may also contact your Human Resources Department, the Legal Department or Internal Audit. Additionally, employees may call the “Integrity Line” or email the Audit Committee Chair and Vice President of Internal Audit directly at auditcommittee@orbitz.com.

The Integrity Line allows employees to make confidential reports of possible violations of the Code. While the Integrity Line does not replace the other existing reporting channels, it may be used to report matters you believe are not being resolved. The Integrity Line’s toll-free number for the Americas is 888-761-7678, and for EMEA, Asia and Pacific the number is 888-769-4321. Callers inside the United States (U.S.) or Canada can dial the toll free number directly; all others must first dial the appropriate AT&T Direct access number free of charge. For a complete list of AT&T Direct access numbers by country, please visit the Orbitz Wiki at <http://wiki.orbitz.net/display/legal/Orbitz+Worldwide+Code+of+Business+Conduct+and+Ethics>. The Integrity Line is available 24 hours-a-day, seven days a week and is staffed by an outside organization that does not include Orbitz Worldwide employees. Interpreters are also available.

You may call the Integrity Line to ask questions or seek advice on compliance and ethics issues, or to report actual or potential violations of the Code. Every effort will be made to keep the identity of anyone reporting an actual or potential violation confidential to the extent permitted by law, unless doing so will prevent Orbitz Worldwide from fully and effectively investigating suspected misconduct. The Integrity Line will not record calls or use call identifiers.

Orbitz Worldwide will not tolerate retaliation against any employee who in good faith seeks advice, raises a concern or reports any actual or potential violation of the Code. Individuals engaging in any retaliatory conduct will be subject to disciplinary action, which may include termination. If you suspect retaliation against you or someone you know, you must immediately contact one of the company resources described above.

We take claims of retaliation seriously, and any allegations of retaliation will be investigated, with appropriate action taken.

Integrity, Openness and Accountability

Employees are expected to comply with all Company policies. If you have any questions about a particular policy or the existence of a policy, please contact one of the company resources described above.

Leaders at all levels of the organization must:

- Create a culture of compliance in which employees understand their responsibilities and feel comfortable raising concerns without fear of retaliation.
- Encourage ethical conduct and compliance with the law by personally leading compliance efforts.
- Consider compliance efforts when evaluating and rewarding employees.
- Ensure that employees understand that business results are never more important than ethical conduct and compliance with policies, including the Code, or the law.

All employees represent the Company and must behave in a manner that does not damage the Company's reputation. The Code represents the standards that all Orbitz Worldwide employees must observe. All third parties that do business with Orbitz Worldwide are also expected to adhere to the principles of the Code.

More specific information and guidance can be obtained from your supervisor or manager or the other company resources described above.

Workplace and Environment

Equal Employment Opportunity. Orbitz Worldwide fosters a work environment in which all individuals are treated with respect and dignity. We do not discriminate either directly or indirectly against employees or potential employees on the basis of race, color, religion, sex, sexual preference/orientation, citizenship, marital status, veteran status, national origin, age, physical or mental disability, or against any other group protected by applicable law. Orbitz Worldwide will make reasonable accommodations for its eligible disabled employees in compliance with the law. Orbitz Worldwide is committed to assuring fair employment, including equal treatment in recruitment, hiring, selection, transfers, promotion, training and development, compensation, termination and disciplinary action, and will not tolerate discrimination either directly or indirectly by its employees or agents.

Harassment-Free Workplace. Orbitz Worldwide will not tolerate unlawful harassment of its employees, customers or vendors in any form. Sexual harassment is illegal in most countries including the U.S., and all employees are prohibited from engaging in any form of sexually harassing behavior or harassment based on any other protected category. Sexual harassment includes, but is not limited to, unwelcome sexual conduct, either visual, verbal or physical, and may include, but is not limited to unwanted sexual advances, unwanted touching and suggestive touching of self or others, language of a sexual nature, telling sexual jokes, innuendoes, suggestions, suggestive looks and displaying sexually suggestive visual materials. If you feel or become aware of any harassment, contact the company resources described in the Introduction section.

Substance Abuse. Orbitz Worldwide is committed to maintaining a safe and healthy work environment free of substance abuse. Employees are expected to perform their responsibilities in a professional manner and to be free from the effects of illegal drugs, alcohol or other substances that may hinder job performance or judgment. Employees are prohibited from the illegal use, sale, dispensing, distribution, purchase, possession or manufacture of illegal drugs or other controlled substances, while on Company property or involved in Company-sponsored business. Orbitz Worldwide encourages those who may be dealing with drug or alcohol abuse problems to utilize services offered through our employee assistance program. Please contact your Human Resources Department for additional information.

The Company may require an employee suspected of unlawful drug use or being under the influence of alcohol while at work to submit to a screening test or undergo mandatory rehabilitation. Similarly, an alcohol or drug-related legal offense could result in termination of employment.

Workplace Violence. The workplace must be free of violent and abusive behavior. Threatening, aggressive or abusive behavior toward fellow employees or others in the workplace will not be tolerated. Employees may not carry weapons or explosives into Orbitz Worldwide facilities, property, while traveling on Company business, or while involved in Company-sponsored business.

Family and Personal Relationships. Orbitz Worldwide is committed to fostering a professional work environment in which managers treat employees in a fair and impartial manner. Orbitz Worldwide is also committed to avoiding perceptions of favoritism, claims of lack of objectivity toward subordinate job performance, and complaints of sexual harassment or even the appearance of impropriety. Accordingly, managers (i.e., employees who directly or indirectly supervise or direct another employee on a full- or part-time basis) may not favor any employee in promotions, compensation, assignments and the like on the basis of any personal friendship or financial or social relationship with the employee.

Environment. Orbitz Worldwide is dedicated to corporate social responsibility, and to taking a leadership role in the development of programs and initiatives – both internally and externally - to better the environment and our communities at large. Orbitz Worldwide strives to comply with all environmental laws, while seeking to prevent or eliminate any practices that may have an adverse environmental impact.

Health and Safety. Orbitz Worldwide is committed to providing its employees with a healthy and safe workplace. Employees must be aware of safety issues and policies that may affect their job. Employees must immediately advise the Company, their managers, or the persons responsible for health and safety, of any workplace injury or any circumstance presenting a dangerous situation. Upon learning of any circumstance that might affect the health and safety in the workplace, managers must take immediate action to address the situation.

Working with Others

Antitrust and Competition. Orbitz Worldwide business activities are subject to competition laws in most countries. These laws are intended to promote fair competition and prohibit activities including those that unreasonably restrain or inhibit competition, “bring about a monopoly” (in the U.S.), “abuse a dominant market position” (in the European Union “EU”), artificially maintain pricing or otherwise illegally hamper or distort normal commerce.

The competition laws that apply may vary depending on where you work. Some laws – such as those in the U.S. and EU – may apply to conduct occurring outside the country's borders.

Competition laws apply to marketing, procurement, contracting, and mergers and acquisitions. As an example, these laws specifically prohibit or restrict agreements:

- To fix, coordinate or control prices.
- To allocate or divide up customers, territories or markets.
- To refrain from competing against other market participants.

Competition laws also prohibit or restrict certain group boycotts and “tying” arrangements. Unlawful tying may occur when the purchase of one product or service requires the purchase of another, “tied” product or service.

These laws are complex and their requirements are not always clear. In many jurisdictions, including the U.S. and the EU, violations can lead to severe penalties and damage awards as well as fines and jail sentences in criminal proceedings.

If you have any questions about how the antitrust and competition laws apply to a particular situation, please contact the Legal Department before taking action.

Trade Shows and Trade Association Meetings. Competition laws are particularly relevant if you attend trade shows or trade association meetings, because of the opportunity to interact with competitors or potential competitors. You should not discuss pricing, including pricing strategies and costs; the allocation of customers, territories or markets; agreements not to compete or to compete only in a limited fashion; agreements to regulate or limit production; or agreements to participate in group boycotts. Any effort with another company or companies to seek relief from courts, regulatory agencies or legislative bodies must be reviewed with the Legal Department before taking action.

Fair Dealing. Each employee should endeavor to deal fairly with Orbitz Worldwide customers, suppliers, competitors and employees. No one should take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair or deceptive business practice.

Conflicts of Interest. All employees occupy positions of trust within Orbitz Worldwide and have a duty of loyalty to the company, both during and after the employment relationship. Employees must avoid any relationship or activity that might create or give the appearance of a conflict between their personal interests and the interests of Orbitz Worldwide or its subsidiaries. Orbitz Worldwide selects suppliers, vendors and contractors in a non-discriminatory manner and based on appropriate quality, cost, service and ability to supply a range of goods and services. A decision to hire a supplier, vendor or contractor must never be based on personal interests or interests of family members, but must be in the best interests of Orbitz Worldwide.

Employees must disclose any relationship that appears to create a conflict of interest to their department manager for referral to the Chief Compliance Officer. Employees must also obtain written pre-approval from the Chief Compliance Officer before proceeding with any transaction, conduct or investment that creates or appears to create a conflict of interest, such as:

- Engaging in personal business transactions that arise from or are based upon an employee's position of authority.
- Owning a financial interest (other than less than five percent of the capital stock of a public company) in a business that does business or competes with Orbitz Worldwide.
- Participating in an opportunity outside the Company that is based on information provided by a competitor, customer or supplier.

Executive Officers of Orbitz Worldwide must disclose actual or potential conflicts of interest directly to the Chief Compliance Officer or the Board of Directors or a designated Committee, and obtain written pre-approval before engaging in any such transaction or investment. Other employees of the Company must seek prior written approval from the Chief Compliance Officer before accepting an invitation to serve as a director or trustee of any other business. If such service or relationship existed at the time of hire or upon acquisition of a new company, the employee must promptly disclose this information and obtain approval to continue providing such service before doing so. Service as a director of a for-profit entity (other than Orbitz Worldwide and its subsidiaries) is strongly discouraged.

Here are additional examples of potential conflicts of interest that would require disclosure:

- Employee or immediate family member (includes employee's spouse, parents, children, in-laws and anyone who shares employee's home) acting as a director, partner, consultant or employee of a firm

or entity that provides goods or services to Orbitz Worldwide or is a competitor of Orbitz Worldwide or one of its subsidiaries.

- Holding a second job that interferes with employment duties at Orbitz Worldwide.
- Ownership by employees or members of their immediate family of a material financial interest, known to the employee, in a firm which is either a competitor of or vendor to Orbitz Worldwide or one of its subsidiaries.
- Using Orbitz Worldwide confidential information in any manner that violates the Company's confidentiality policy (*see Confidential and Proprietary Information*).

Business or Investment Opportunities. Employees of Orbitz Worldwide owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises. If you learn of a business or investment opportunity as a result of your position at Orbitz Worldwide, such as from a competitor, an actual or potential customer, supplier or business associate of the Company, this is considered an investment opportunity for Orbitz Worldwide. Subject to other conflict-of-interest safeguards previously outlined in this document, you may not participate in the business or make the investment without the prior written approval of the Chief Compliance Officer. Executive Officers must obtain the prior written approval from the Chief Compliance Officer or the Board of Directors or a designated Committee.

Gifts and Entertainment. Employees or the immediate family of employees shall not use their position with Orbitz Worldwide to solicit any cash, gifts or free services from any Orbitz Worldwide customer, vendor or contractor for personal benefit. Gifts or entertainment from others should not be accepted if they could be reasonably considered to improperly or materially influence an Orbitz Worldwide business relationship with or create an obligation to a customer, vendor or contractor.

Receiving

The following examples are guidelines regarding accepting gifts and entertainment:

- Nominal gifts and entertainment, such as logo items, pens, calendars, caps, shirts small food or gift baskets, and mugs are acceptable.
- Reasonable invitation to business-related meetings, conventions, conferences or product-training seminars may be accepted.
- Invitations to social or cultural events may be accepted if the cost is reasonable and your attendance serves a customary business purpose such as networking.
- Invitations to sporting activities or ticketed events that are usual and customary in the conduct of business and promote good working relationships with customers and suppliers may be accepted.

Giving

Just as Orbitz Worldwide has rules for receiving gifts and entertainment, we must also be careful how we offer them. Offering social amenities or business courtesies of a nominal value such as modest gifts, meals and entertainment is common in the commercial world and is meant to create goodwill and enhance business relationships. Using good judgment and moderation, occasionally exchanging entertainment or gifts of nominal value with non-governmental individuals or entities is appropriate, unless the recipient's employer forbids the practice. Any social amenities or business courtesies must always comply with the policies of the recipient's organization and applicable law.

Special gift giving rules may apply to employees involved in seeking business with or providing services to government entities, including entities controlled or owned by government entities (i.e., government-owned airlines). Contact the Compliance & Ethics Department or an attorney in the Legal Department for specific information and guidance on these rules.

External Communications. The Orbitz Worldwide Public Relations and Government Relations & Public Affairs Departments are responsible for all internal and external communications across the organization, including strategic counsel, public relations, brand communications and media relations and speaking engagements.

It is Orbitz Worldwide policy that, unless specifically authorized, no employee is to make any public statements, whether verbal or written, on behalf of the organization, or those that may be construed to be on behalf of the organization, unless otherwise expressly allowed by Company policy. Employees are not authorized to provide any response to an inquiry about Orbitz Worldwide, its brands or its businesses including, but not limited to, media interviews, commentary to analysts, writing newspaper or magazine articles, expressing viewpoints related to competitor initiatives, forward-looking information, company strategy, proposed legislation or government regulations, or speculation about the Company's financial condition, as well as any other external sources seeking information about Orbitz Worldwide.

Any employee who receives an inquiry from the media or from an industry or financial analyst should promptly refer the inquiry, without offering comment, to the Orbitz Worldwide Public Relations Department. Employees must be careful not to disclose confidential, personal or business information through public or casual discussions, to the media or others.

Regulatory or Legal Inquiries. Inquiries from governmental officials and entities, and any outside attorneys representing a third party related to Orbitz Worldwide and its business affairs, must be referred to the Legal Department unless you have been specifically authorized to respond to such inquiries. If you are authorized, you should inform the Legal Department of any response you provide. Examples of regulatory or legal inquiries include requests for information, notice of an investigation, or service of process in a lawsuit.

Political Contributions and Lobbying. Employees may, of course, participate in the political process as private citizens. It is important to separate personal political activity from Orbitz Worldwide political activities in order to comply with the appropriate rules and regulations regarding lobbying. Orbitz Worldwide will not reimburse employees for money or personal time contributed to political campaigns. In addition, employees may not work on behalf of a candidate's campaign during working hours or at any time use Orbitz Worldwide facilities or resources for that purpose.

Orbitz Worldwide is prohibited from making contributions to candidates, officeholders and political parties at the U.S. federal level and under certain state and local laws in the United States.

If you have any questions, contact the Compliance & Ethics Department.

Bribes and Kickbacks. Employees must ensure that payments made by or on behalf of Orbitz Worldwide are made only for legitimate business purposes. Under no circumstance is it acceptable to offer, give, solicit or receive any form of bribe or kickback.

The laws of virtually all countries in which Orbitz Worldwide companies operate as well as extra-territorial laws, such as the U.S. Foreign Corrupt Practices Act and various United Kingdom (UK) anti-bribery-related legislation, prohibit bribes to governments and other officials (such as political candidates, political parties and their officials, employees of government-owned business, United Nations officials and individuals, etc.). A violation is a serious criminal offense for both companies and individuals, which can result in fines and imprisonment. Orbitz Worldwide employees must not give or offer anything of value that would be beyond usual or customary practices or would violate a country's laws on giving to government officials.

Facilitating Payments. U.S. law permits certain "facilitating payments" to foreign government employees. A facilitating payment is a payment made to "fast-track" the supply of goods or services but not to influence a decision as to whether the goods or services should be supplied in the first place.

Facilitating Payments may be made only in these limited circumstances:

- It is legal in the country in question (refer to the Legal Department if you are unsure).
- It is requested by the government employee.
- It is necessary - just because you *can* speed up the process by making a facilitating payment does not mean it is *necessary* to do so. Consider whether there are other time restraints.
- It does not involve a decision to award business to or to continue doing business with the Company.
- You obtain written approval from the Legal Department.
- The payment is nominal and is fully and accurately recorded on the Company's books.

Important Note: In some countries all such "facilitating payments" are considered illegal and therefore should never be made. Payments may never be made to any U.S. government employee.

Due to the complex laws in this area, you should contact the Legal Department or the Compliance & Ethics Department with any questions.

Marketing, Advertising and Promotions. Orbitz Worldwide markets its products and services in a fair, truthful and ethical manner. Marketing, telemarketing, point-of-purchase, sweepstakes and advertising materials are designed to reflect available products and services. Orbitz Worldwide uses marketing, telemarketing, point-of-purchase, sweepstakes and advertising materials to educate the public, report to its constituents, increase awareness of its services, recruit employees, promote brand recognition and support marketing initiatives.

If you have any questions, contact the Legal Department for guidance.

Privacy

Privacy and Personal Information. Orbitz Worldwide is committed to handling personal data responsibly and in compliance with privacy laws and policies. Countries are more stringently regulating the collection and use of consumers' "personal data" such as name, home and office contact information. In addition, many countries regulate personal data of company representatives in business-to-business transactions. A few countries even regulate the privacy of information relating to corporations.

Personally Identifiable Information (PII) is any information that by itself or as part of a combination of information specifically distinguishes an individual by unique descriptors or identifiers. In the course of employment, employees may come into possession of PII relating to other employees, customers, vendors or service providers. PII must be restricted and protected from discovery by unauthorized parties through

encryption or similar encoding security measures. Employees should never store PII on the hard drive of their computers, or leave PII available in and around their workstations, but instead should access it only through a secure site, or otherwise keep such information in a locked drawer, office or storage area.

In the event PII is inadvertently disclosed, the Company may have an immediate obligation, depending on applicable law, to notify those individuals whose PII might be compromised. Accordingly, in the event of the unauthorized disclosure of PII, employees must immediately notify the Information Security Department and an attorney in the Legal Department.

Employee Confidentiality. Orbitz Worldwide believes in respecting the confidentiality of our employees' personal information. This means access to personal records should be limited to company personnel whose function and responsibility specifically includes the handling of such personal data, and who have a clear business need for that information. Employees who have access to personal employee information must treat it appropriately and confidentially.

Personal employee information is never provided to anyone outside of Orbitz Worldwide and its subsidiaries without proper authorization.

Trading In Securities and Non-Public Information

Employees of Orbitz Worldwide may, in the course of performing their duties, come into possession of "material non-public information" about Orbitz Worldwide or its subsidiaries, or other companies with whom Orbitz Worldwide does business. "Material non-public information" is defined as any information that a reasonable investor would consider important in making a decision to buy or sell securities. In short, it includes any information that could be expected to affect the price of securities, either positively or negatively. Buying or selling securities based on such information is referred to as "insider trading" and can result in substantial fines and imprisonment.

It is illegal for an Orbitz Worldwide employee to, directly or indirectly, buy or sell stocks (shares) or bonds based on insider information or to discuss such information with others who might buy or sell such securities, including shares or bonds.

For example, if in the course of your work and prior to a public announcement, you become aware of an acquisition, divestiture, material contract, or a major change in management that would materially affect Orbitz Worldwide or one of its subsidiaries or another company, you may be guilty of insider trading if

you bought or sold securities of Orbitz Worldwide or some other company based on this knowledge or passed this information to anyone who then bought or sold such securities. For a more detailed explanation of the Insider Trading Policy, please contact the General Counsel or another attorney in the Legal Department.

Orbitz Worldwide Assets

Use of Orbitz Worldwide Property. The use of Orbitz Worldwide property for individual profit or any unlawful or unauthorized personal purpose is prohibited. Orbitz Worldwide information, technology, intellectual property, buildings, land, equipment, machines, software and cash must be used for business purposes only, except as provided by Company policy or approved by your manager. Further, travel and entertainment expenses must be reasonable and substantiated by receipts.

Destruction of Property and Theft. Employees shall not intentionally damage or destroy the property of Orbitz Worldwide or others or engage in theft.

Money Laundering or Illicit Financing. Orbitz Worldwide is committed to actively guarding against the use of Orbitz Worldwide products and services by third parties for the purposes of money laundering or illicit financing activity, including terrorist activity. Money laundering is the process of engaging in financial transactions in order to conceal the identity, source and/or destination of money. Some examples of money laundering include tax evasion and false accounting. By contrast, illicit financing activity focuses on the destination and use of funds that may come from legitimate or criminal sources, or a combination of the two. Some examples of illicit financial activity include all terrorist activities and deriving or using proceeds from drug activities.

Orbitz Worldwide will cooperate fully with law enforcement and regulatory investigations concerning possible money laundering or illicit financing activity. You must immediately contact the Legal Department or the Compliance & Ethics Department if you are approached in any manner by government agencies for records and information on customers, agents, or business partners that may be under investigation. Strict rules specify time frames for complying with such government inquiries or requests and for reporting certain activities that may bear upon money laundering or terrorist activity. Therefore, your immediate action is vital in both reporting requests and responding to instructions by the Legal Department or the Compliance & Ethics Department.

Any employee who suspects that Company products or services are being used by any third parties for the purpose of money laundering or illicit financial activity, including terrorist activity, should immediately report the concern to the Compliance & Ethics Department or to an attorney in the Legal Department.

Intellectual Property of Orbitz Worldwide. Orbitz Worldwide is committed to protecting its brands and other intellectual property. All employees must safeguard the intellectual property of Orbitz Worldwide, such as trademarks, service marks, patents, copyrights, and trade secrets. Such property is the very foundation of Orbitz Worldwide. All such information, products and inventions, whether or not they are subject to a copyright, patent, trade secret or other rights, are the sole property of Orbitz Worldwide.

Intellectual Property of Others. Employees may not reproduce, distribute or alter copyrighted materials without permission of the copyright owner or its authorized agents. Software used in connection with Orbitz Worldwide business must be properly licensed and used only in accordance with that license. Using unlicensed software could constitute copyright infringement. The unauthorized reproduction, distribution or use of copyrighted materials, including software, can result in severe civil and criminal penalties and is strictly prohibited.

Use of Information Technology and Communications Equipment. Orbitz Worldwide information technology and communication systems, including, but not limited to, computers, email, Internet access lines, personal digital assistants, telephones and voice mail are the property of Orbitz Worldwide and are to be used primarily for business purposes. Orbitz Worldwide information technology and communication systems may be used for minor or incidental personal situations provided that such use is kept at a minimum and does not interfere with the Company's operations or any employee's job responsibilities.

These Orbitz Worldwide systems and the data that reside on them are the property of Orbitz Worldwide. Subject to applicable law, users should not have any expectations of personal privacy with respect to their use of Orbitz Worldwide equipment or systems, the data residing on them, or any electronic communications transmitted through them. To the extent permitted by law, records of your electronic communications may be made and used for a variety of reasons, including monitoring these communications to verify that Company policies, including the Code, are being followed. Keep this in mind and exercise care when using Orbitz Worldwide technology and communication systems.

Employees must comply with the Information Security Policy and the Corporate Policy and Guidelines Regarding Customer's Personal Identifiable Information, which are both available on the Orbitz Wiki at: <http://wiki.orbitz.net/display/security/ISC+Policies%2C+Standards+and+Procedures>

Employees may not use Orbitz Worldwide information technology or communication systems to:

- Allow others to gain access to the Company's information technology or communication systems through the use of your password or other security codes.
- Access files, data, or systems to which express authorization from the owner, whether Orbitz Worldwide or another company, has not been obtained.
- Unless permitted to do so under the Information Security Policy, remove, install or modify any Orbitz Worldwide-installed software or programs without authorization from the IT Department.
- Send copyrighted documents not authorized for reproduction.
- Attempt to circumvent or subvert system or network security measures.
- View network traffic for any reason (unless required by your position).
- Send or promote the distribution of unsolicited and unnecessary "junk mail" (e.g., chain letters, advertisements or other communications that represent a waste of time or computer resources for Orbitz Worldwide or others).
- Access the Internet for inappropriate use such as pornography.
- Send harassing, threatening or obscene messages.
- Engage in any non-Orbitz Worldwide-related commercial venture.

It is extremely important that you take all necessary measures to secure your computer and any of your computer or voicemail passwords. If you have any reason to believe that your password or the security of a Company computer or communication resource has in any manner been compromised, you must change your password immediately and report the incident to the Information Security Department.

Business Information and Records

Confidential and Proprietary Information. While employed at Orbitz Worldwide, employees may be exposed to information considered confidential by Orbitz Worldwide, or may be involved in the design, development or maintenance of products, procedures or inventions related to the business of the Company. All such information, products and inventions, whether or not subject to a copyright, patent, trade secret or other rights, are the sole property of Orbitz Worldwide. Employees must not disclose confidential information to persons outside the Company, including family members, except for reasons strictly related to the performance of their authorized duties, and should share such information only with specific employees who have a business “need to know.”

Confidential information includes, but is not limited to:

- Proposed or advance product plans.
- Projected earnings, important management or organizational changes, or information about mergers or acquisitions and any other information related to the foregoing.
- Product or service design and development or training.
- Computer software and systems developed by, for, or unique to, the Company’s business.
- Client lists (including phone numbers, addresses and email addresses) or client contact information.
- Personal or financial information pertaining to any other employee of Orbitz Worldwide.
- Advertising or marketing plans, cost structures, pricing plans and strategies.

Employees are responsible and accountable for safeguarding Company documents and information to which they have direct or indirect access as a result of their employment with Orbitz Worldwide. This duty includes the responsibility to protect sensitive or confidential Company documents from unwanted disclosure.

Financial Reporting and Records. Each manager is responsible and accountable for maintaining an adequate system of internal controls over all areas of her or his responsibility. These controls should provide reasonable assurance that (1) (A) all transactions have been properly recorded, (B) each such transaction has been made with management authorization and in accordance with applicable laws and regulations, and (C) Company assets are adequately safeguarded; and (2) as a consequence, the financial records and other reports are accurately and fairly stated. Each employee is expected to adhere to these established controls and the following prohibitions:

- No employee may willfully make false or misleading entries in the Company's books and records for any reason.
- No employee may willfully conceal Company information from authorized auditors or governmental regulatory agencies. Employees are required to disclose, on a timely basis, information required to evaluate the fairness of the Company's financial presentation, the soundness of its financial condition and the propriety of its operation.
- No employee may make a payment or transfer of Company funds or assets that is not authorized, properly recorded and clearly accounted for on the Company's books. No employee may make or approve a payment or transfer Company funds or assets with the intention or understanding that any part of such payment or transfer is to be used except as specified in the supporting transactional documents.
- No employee shall deliberately attempt to circumvent any Company processes or controls.

All Senior Officers and other managers responsible for accurate books and records, and accounting and disclosure of financial information have a special duty to ensure that these standards are met.

Records Management. Orbitz Worldwide creates and maintains its information and business records in accordance with applicable law. The business of Orbitz Worldwide and its subsidiaries generates a broad range of information and communications. The information is created in many forms (such as email, Web page content, word processing files, systems files and databases) and communicated or stored on various media (such as paper, digital, audio, company shared drives, computer hard drives, and CD-ROMs), whether maintained or stored at the workplace or off site. Orbitz Worldwide requires all employees to comply with its Records Management Policy regarding standards and regulations for the creation, distribution, preservation and disposition of information. The Policy prohibits the unauthorized destruction of, or tampering with, any records when the Company is required by law or government regulation to maintain the records or when it has reason to know of a pending or contemplated investigation or litigation relating to the records (commonly referred to as a "hold notice"). The Records Management Policy is currently available on the Orbitz Wiki at <http://wiki.orbitz.net/display/legal/Records+Management>. If you have any questions concerning records retention or how the Orbitz Worldwide Records Management Policy applies to a particular situation, please contact your Record Manager or the Compliance & Ethics Department.