U.S. Political Contributions and Disclosure Policy

Introduction

It is the general policy of this Company to participate in the free political processes of the local, state and federal governments of the United States, within the restrictions imposed by applicable law, and for the general benefit of the operations of the Company and its shareholders, team members and customers. Other factors considered in determining support for a candidate include whether the candidate sits on a committee with jurisdiction over legislation of interest to the Company and hospitality and travel industry; the candidate's position or voting record on issues of direct concern to the Company and its team members; and whether the candidate represents a district or state in which Hilton conducts operations. All contributions will be made to promote the interests and business objectives of Hilton, without regard for the private political preference of its executives. All such participation shall be accomplished strictly in accordance with all applicable legal restrictions and shall be subject to the public disclosure processes outlined in this policy.

Company Political Activities

State and Local Contributions: Where permitted by law, the Company may contribute directly to state and local candidates, state party committees, and other state and local political entities. All such contributions are reviewed and approved in advance by the Company's Executive Vice President of Corporate Affairs. The Company will semiannually disclose on its website all state and local political contributions and expenditures.

View expenditures here.

527 Committees: When permitted by law, the Company may contribute to 527 political committees. All such contributions are reviewed and approved in advance by the Company's Executive Vice President of Corporate Affairs. The Company will semi-annually disclose on its website all political contributions and expenditures.

View expenditures here.

Non-Profit Organizations: For any trade association of which the Company is a member or otherwise contributes, the Company will semiannually disclose on its website the portion of its payments that are used for lobbying and political expenditures as defined by 26 U.S.C. Section 162(e). Additionally, the Company will semiannually disclose on its website all contributions made to 501(c)(4) organizations where such contributions are made for a political purpose. All such expenditures are reviewed and approved in advance by the Company's Executive Vice President of Corporate Affairs.

View trade association expenditures here.

View 501(c)(4) expenditures here.

Independent Expenditures: While companies are permitted by law to engage in independent expenditures or electioneering communications to advocate for the election or defeat of federal

candidates, the Company does not presently engage directly in such activity. If the Company does choose to engage in independent expenditures or electioneering communications, that activity will be disclosed. All such expenditures will be reviewed and approved in advance by the Company's Executive Vice President of Corporate Affairs.

View expenditures here.

Ballot Measures: When permitted by law, the Company may make contributions to ballot measures committees. These contributions are disclosed under applicable laws that require recipients of political contributions to disclose the source, date and amount of all contributions received. All such expenditures are reviewed and approved in advance by the Company's Executive Vice President of Corporate Affairs. Additionally, the Company will semiannually disclose on its website all contributions made to ballot measures.

View expenditures here.

Political Action Committee

Federal law does not permit corporations to contribute their own funds to federal candidates, political parties, or most other political committees. U.S. law does permit companies to establish a political action committee to collect employee donations to contribute to federal candidates and other committees regulated by the Federal Election Commission (FEC).

The Company has created the Hilton Worldwide Political Action Committee ("Hilton PAC") for this purpose. Contributions to federal candidates and committees are made only through Hilton PAC, in accordance with the Federal Election Commission (FEC) regulations. The Hilton PAC may also contribute to state and local candidates where it is permissible. All such contributions are reviewed and approved in advance by the Company's Executive Vice President of Corporate Affairs. To provide funding for Hilton PAC, the Company periodically solicits voluntary contributions from eligible employees. The Company fully discloses all Hilton PAC activity on reports filed with the FEC, which are publicly available on the FEC Website found here.

Personal Employee Political Activities

To the extent an employee personally engages in political activity, such participation must be on non-working time, without the use of Hilton resources unless otherwise authorized, and in a manner that does not suggest Hilton sponsorship or approval. Hilton does not reimburse employees for any such personal contributions.

Oversight and Governance

The Company maintains an internal policy governing political contributions and personal political activities and enforces compliance through the Company's Legal and Corporate Affairs Departments. The Nominating and Corporate Governance Committee – composed entirely of independent directors who sit on Hilton's Board of Directors annually reviews policies and practices regarding political contributions and expenditures by the Company and Hilton PAC.