

EXHIBIT PSX00097

Context

- Google has consistently introduced changes to the Search Results Page that give paid placements (PPC ads and Google Hotel Ads) more visually prominence and screen real estate, displacing organic (SEO) content
- Given Google's dominant position in search, this conduct is potentially anti-competitive

Data and Results

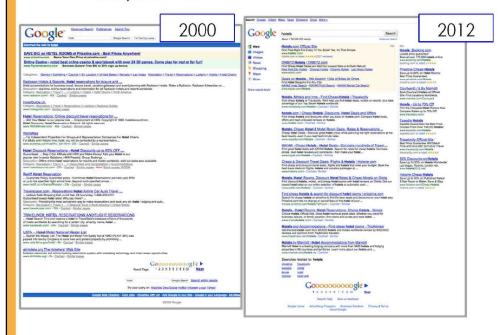
- Combined data from Google PPC ads, Google Hotel Ads and Google SEO
- From 2015-to-date, Google's optimization of the search results page towards paid placements costs Booking.com an estimated REDACTED in 2019
- When we account for our (relatively speaking) improved visibility within the organic ranking, our estimate increases by almost
- The event study we conduct shows clear evidence of a strong mix shift from free to paid on the exact date of a recent change in the visual appearance of search ads.
 - We estimate Booking.com lost Commission in two months as a result of this one design change.

2018

Introduction - Google's different types of traffic.

Contents of deck:

- Examples of Google update since 2000
- Method to test the hypothesis that advertising spend is increased
- Analysis results



Paid Search AKA internally as Pay per Click (PPC) Paid

Google Hotel Ads (GHA) Paid

> Search Engine Optimization (SEO), AKA Organic Search Free

Hotels in Amsterdam | 976 Hotels from \$55 per Night (Ad) www.trivago.com/ • Find Your Ideal Hotel in Amsterdam. Compare Prices and Save on your... 12 Best Hotels in Amsterdam. Hotels from \$22/night - Kayak (AC) www.kayak.com/ -Find and Compare Great Hotel Deals, Book with Confidence on KAYAK, Hotels | Amsterdam About these results Fri, 1 Nov Thu, 31 Oct Guest favorites \$ Budget options The Dylan 7 ***** (289) 8 **** (184) Residence Inn By Marriott... 4,4 ***** (174)

hotel in amsterdam

All www.booking.com/Amsterdam/Hotels -**** Rating for booking.com; 5,0 - 568 reviews

Best Hotels in Amsterdam | Up to Half-Price on Hotels (Ad) www.hotels.com/Amsterdam/Best-Hotels -

£0 - £45 Hotels - up to £ 45.00/day - Book Now · More -

Book the Rest Hotel in Amsterdam, Price Guarantee, No Booking Fee

Last Minute Deals · Secure Booking · Hotel Deals · Hotels Near Me · Bo... Hotels in Amsterdam | Best Price Guarantee | booking.com

Book your Hotel In Amsterdam online. No reservation costs. Great rates.

Support in 42 Languages, Villas, Hotels, Save 10% with Genius, Secure Booking, Apartments, 24/7 Customer Service, No Booking Fees, Bed an.,

Google

Great savings on hotels in Amsterdam, Netherlands online. Good availability and great rates. Read hotel reviews and choose the best hotel



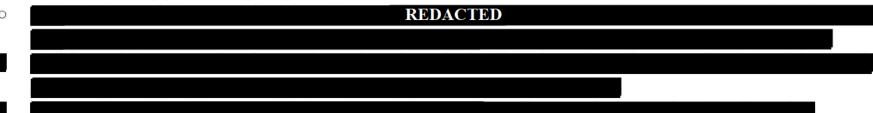


- 1. Paid Search / Pay Per Click (PPC)
 - Paid clicks
 - **Auction based**
- 1. Comparison Search / Meta Search
 - Paid clicks
 - **Auction based**
- 1. Organic / Natural Search / Search Engine Optimisation (SEO)
 - Free clicks

Hypothesis: Google is optimizing their search result page (SERP) such that Booking.com gets a smaller fraction of free clicks over time and thus the advertising spend is increased.

Booking.com acquires clicks from Google in three different ways:

Paid Search, aka Pay per Click (PPC) - Paid



- Google Hotel Ads (GHA) Paid
 - REDACTED
- Search Engine Optimization (SEO) Free
 - The results of Google's algorithm after the user searches for or a keyword or a set of keyword like "hotel in Paris"
 - The users clicks on a 'normal', i.e. not advertised link

Business via Google on all channels.

REDACIED

Channel mix at Booking.com.

RIDACIDI

Slide 7

- +lucie.denooij@booking.com this is great, but i think what would be clearer is to make another graph that limits to just google, that way the SEO shift is more visible

 Justin Rao, 11/20/2019
- Agreed showing for just Google.

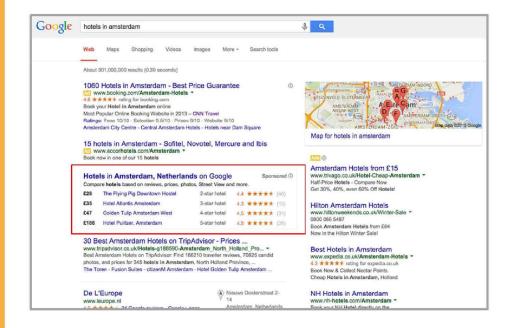
 If possible would also be good to display Non-Brand PPC, Brand PPC, Non-Brand SEO and Brand SEO

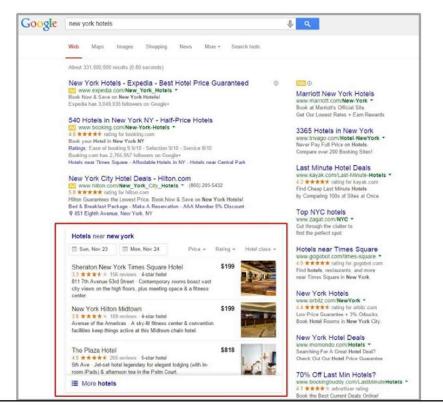
 Mark Potton, 11/20/2019

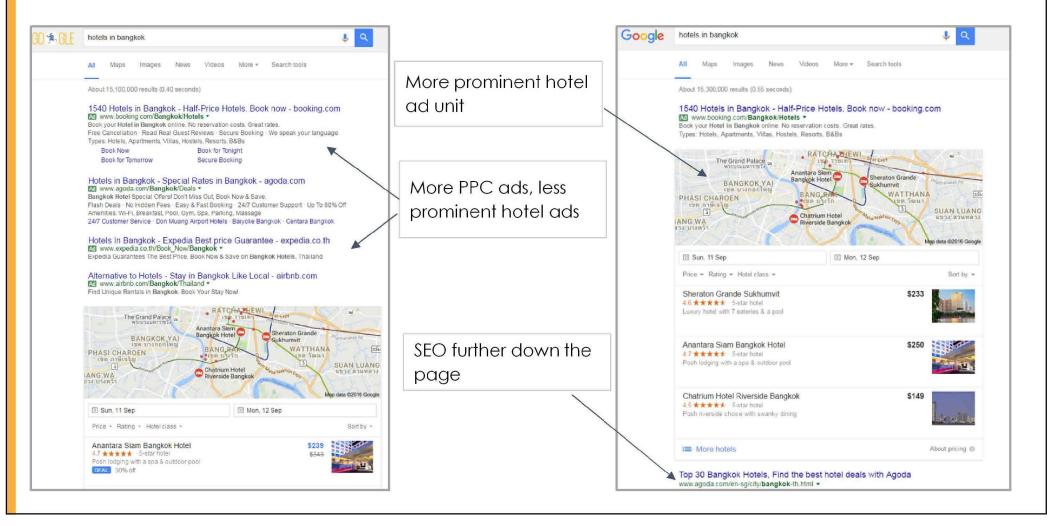
Channel mix at Booking.com Google vs all others.

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Since 2015 the Free/Organic continues to be pushed further below the fold

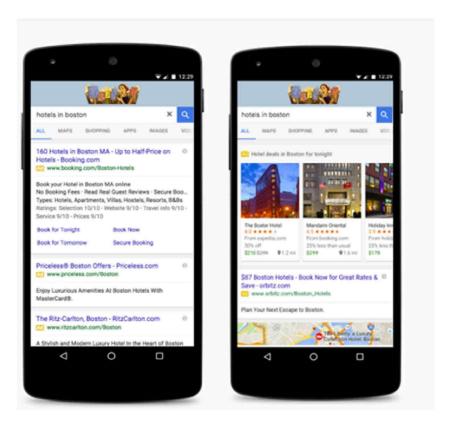






2	Insert date Mark Potton, 11/12/2019
1	+jason.paget@booking.com, do you know from when these screenshots are? Lucie de Nooij, 11/5/2019
1	not from just looking at them, there's time stamps in the platform, although these look preplatform. Who grabbed them? are they from the wayback? Jason Paget, 11/6/2019
2	+justin.rao@booking.com, I got these from your presentation, do you know where the screenshots are from? Lucie de Nooij, 11/7/2019
2	I don't know can we get new ones from the internet archive? Justin Rao, 11/11/2019
2	REDACTED
3	couldn't figure out how far back this goes would have to be 3-4 years to get the hotel finder major rollouts $\frac{1}{12}$

Mobile search has evolved to become leading device.



We observe similar dynamics as on desktop, but often with larger impact due to the reduced screen size.

By pushing the organic results below the fist visible page, most users don't even bother swiping until they get there.

Testing the hypothesis.

Observation

Google is optimizing their SERP

The effects of that probably differ between mobile and desktop

Assumed measurable effects The number of clicks Booking.com can acquire via organic/free search decreases or grows less fast than paid clicks

 Specific Google updates changes are observed in Booking.com performance for organic

Assessment

- Compare the fraction of free and paid clicks over time
- Correct for our performance, so for click coverage or visibility
- Monitor organic performance over time and identify Google's updates
- Estimate growth rates if change(s) had not happened and calculate monetary effect

Input

- Total spend on Google in 2019 (using best estimate for Nov and Dec)
 - O PPC REDACTED
 - O GHA: REDACTED
 - Total Google spend = REDACTED

Paid and free clicks over time - all traffic.

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Paid and free clicks over time - desktop.

RIDACID

+lucie.denooij@booking.com - do we have the same for mobile? Mobile is where Google made big changes in the Paid Search ad design in May, so would be interesting to see the impact

Assigned to Lucie de Nooij Mark Potton, 11/20/2019 Financial impact of channel mix change.

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Indexed paid and free clicks.

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SEO visibility and PPC click coverage.

REDACTED

REDACTED

Clicks corrected for coverage or visibility.

Estimate of financial impact if SEO had grown proportional to visibility.

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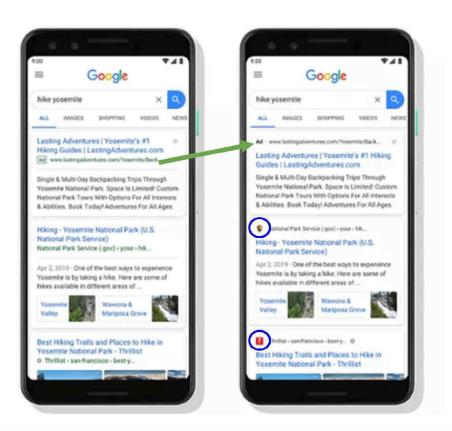
Context

- On May 22nd 2019 Google introduced a mayor design update on mobile
- Booking.com noticed a considerable increase in click through rate on PPC and a decrease for free clicks as a result

Data and Results

- The drop in SEO Year on Year growth is visible by eye
- The fraction of free clicks Booking.com acquires from Google decreased by almost over night
- The SEO Year on Year growth rate decreased by
- Effect is not seen when examining desktop only

Deep dive into one of Google's design updates: May 22, 2019.



Google updated the mobile search design:

- Color of the adword marker changed from green
- Included a favicon to highlight to the advertiser's brand

RIDACIBI

+lucie.denooij@booking.com - is it possible to have SEO brand and SEO Non-brand broken out here as well?
Assigned to Lucie de Nooij
Mark Potton, 11/20/2019 5

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Fraction of free Google clicks - all traffic.

Fraction of free Google clicks - mobile traffic.

Fraction of free Google clicks - desktop traffic.

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Paid Search (PPC) Mobile Click-Through Rate.

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Slide 28	
7	Should this be non-brand? Or all CTR not just for one language? Not sure Booking Name is the best account ton use Mark Potton, 11/25/2019
5	+rafael.mourao@booking.com, can you have a look at Mark's comment? Lucie de Nooij, 11/4/2019
1	On it. The ideal would be to have keywords that are always on top, that's why I used Booking Name. I'll check aggregated CTR and other keywords. Rafael Mourao, 11/5/2019
2	I replaced it with our top position CTR (for exact keywords in the first position for the day). Let me know if that's better? +justin.rao@booking.com Rafael Mourao, 11/18/2019
8	Looks much better. It may also be good to show YoY plots as well to really highlight the change Mark Potton, 11/20/2019
1	Hi Mark, we only have data device stats dating back from 2018-01, so YoY will start in 2019-01, like here:
	https://paste.booking.com/data/images/4/4iabqu.png
	If this is fine we can add it as another slide. Jeroen Hofman, 11/25/2019

Financial impact of May 22nd update.

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Conclusion.

Context

- Google has consistently introduced changes to the Search Results Page that give paid placements (PPC ads and Google Hotel Ads) more visually prominence and screen real estate, displacing organic (SEO) content
- Given Google's dominant position in search, this conduct is potentially anticompetitive

Analysis

Using combined data from Google PPC ads, Google Hotel Ads and Google SEO, we estimated the financial impact of the overall trend and of one specific update

Conclusion

- From 2015-to-date, Google's optimization of the search results page towards paid placements costs Booking.com an estimated REDACTED in 2019
- When we account for our (relatively speaking) improved visibility within the organic ranking, our estimate increases by almost REDACTED
- The event study we conduct shows clear evidence of a strong mix shift from free to paid on the exact date of a recent change in the visual appearance of search ads
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