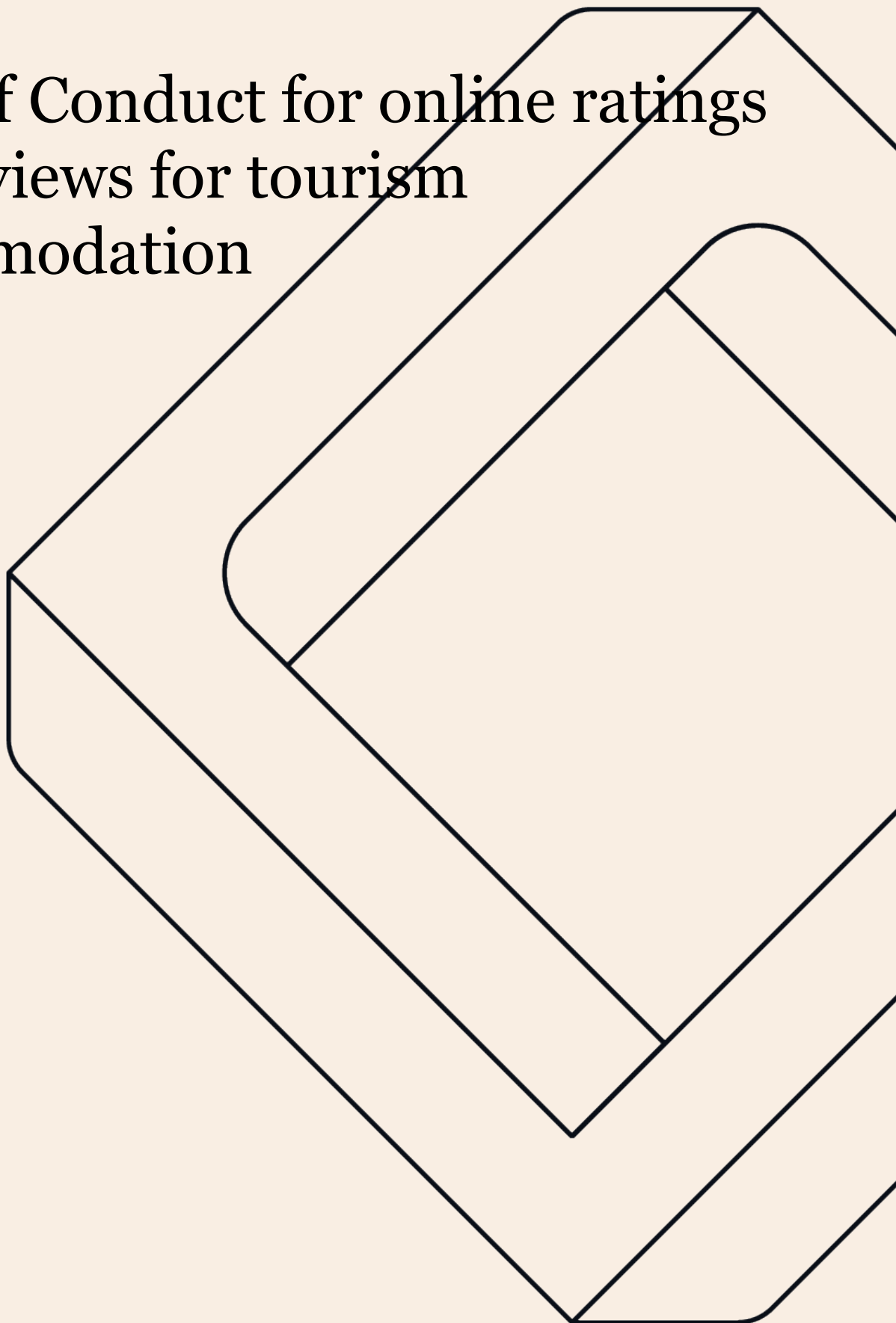


# Code of Conduct for online ratings and reviews for tourism accommodation

12 June 2025



# Code of Conduct principles

## 1. Introduction

This **Code of Conduct for Online Ratings and Reviews for Tourism Accommodation** aims to achieve greater transparency and reliability of online reviews for consumers and businesses in the tourism and accommodation sector. The Code shall enable greater cooperation and cohesion in the tourism accommodation industry's digital space, improving practices around ensuring the authenticity of reviews, from guests who have had an experience with the accommodation.

This Code of Conduct has been co-created by stakeholders from the tourism ecosystem, in particular those to whom online reviews and ratings for tourism accommodation are relevant. The stakeholders represent diverse perspectives within the industry, including online platforms which host reviews, associations of these platforms, accommodation providers and their associations, consumer organisations, and Destination Marketing Organisations (DMOs). The co-creation process has been facilitated and supported by regulatory authorities and the European Commission.

These stakeholders identified the challenges they face as well as principles they can commit to, in a Code of Conduct to improve practices around online ratings and reviews for tourism accommodation. The Code of Conduct represents a recognition of the shared responsibility of all relevant stakeholders to ensure these ratings and reviews remain an accurate and trustworthy information source for consumers.

The following stakeholders are signatories to the Code of Conduct:

*[Stakeholders to be added once they have decided to become a signatory]*

In addition, the following stakeholders also contributed to the creation of this Code of Conduct:

*Adiconsum; Airbnb; Altroconsumo; APHA; Asociácia hotelov a reštaurácií Slovenska; BEUC; Booking.com; BravoNext SA (lastminute.com group); BWH Hotels Central Europe; Croatian National Tourist Board; Cyprus Deputy Ministry of Tourism; Develop Athens SA; DGA Group; Directorate for Consumer Protection at the Ministry of Agriculture, Food and Viticulture Luxembourg; Consumentenbond; EFCO&HPA; EKPIZO Consumer Association; Elpis Tourism Seminars; Estonian Hotel and Restaurant Association; EU Travel Tech; Expedia Group; Fáilte Ireland; FIHR; GHR; Golden Age Hotel Athens; H Hotels Collection; Hostelworld PLC; Hotelverband Deutschland IHA; HOTREC; Lastminute.com; Lithuanian National Consumers Federation; MCCA; Ministry of Economics – Latvia; Ministry of Sport and Tourism – Poland; Ministry of Tourism – Italy; Ministry of Tourism – Greece; PARADORES DE TURISMO DE ESPAÑA, S.M.E., S.A.; Radisson Blu Park Hotel Athens; Slovenian Tourist Board; The Czech Association of Hotels and Restaurants; Tripadvisor; Trustpilot; Turismo de Portugal; UMIH; University of Greenwich; Vienna Tourist Board; Vincci Ever*

This Code of Conduct is intended to support the implementation of existing EU legislation and initiatives in this field, including the following:

- Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act);
- Regulation (EU) 2022/1925 of the European Parliament and of the Council of 14 September 2022 on contestable and fair markets in the digital sector and amending Directives (EU) 2019/1937 and (EU) 2020/1828 (Digital Markets Act);
- Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council ("Unfair Commercial Practices Directive" as amended by Directive (EU) 2019/2161 of the European Parliament and of the Council of 27 November 2019 amending Council Directive 93/13/EEC and Directives 98/6/EC, 2005/29/EC and 2011/83/EU of the European Parliament and of the Council as regards the better enforcement and modernisation of Union consumer protection rules, hereafter referred to as EU Omnibus Directive.
- Regulation (EU) 2019/1150 of the European Parliament and of the Council of 20 June 2019 on promoting fairness and transparency for business users of online intermediation services, hereafter referred to as Platform to Business Regulation;

Furthermore, this Code aims to build on existing initiatives such as the 2023 Consumer Protection Pledge and the industry-led Coalition for Trusted Reviews.

By building on this foundation, the Code identifies areas where stakeholders across the industry can commit to further enhancing trust and reliability in online ratings and reviews. This will ensure the Code remains a valuable resource for both consumers and accommodation providers.

## 2. Horizontal principles

Certain horizontal principles have been agreed by stakeholders. These principles are relevant for all stakeholders and will ensure the Code of Conduct remains pertinent and useful in addressing challenges around online ratings and reviews for tourism accommodation.

**Signatories agree to the following:**

**2.1 Alignment with EU legislative framework:** This Code will work within existing EU regulatory frameworks. It is not intended to replace or redefine EU or national legislation. Notably, the Code will work within the framework of the Digital Services Act (DSA), which is designed to set clear obligations for different types of online intermediary services and platforms across the EU, proportionally to their role, size, and nature. Furthermore, this Code builds on the Unfair Commercial Practices Directive (UCPD), which outlines specific transparency requirements which apply to traders who allow any users to access consumer reviews, as well as highlighting prohibitions of misleading practices in relation to consumer reviews. The Code provides relevant stakeholders with guidance on best practices related to review hosting, and the relevant obligations under the DSA and the UCPD.

**2.2 Proportionality and flexibility regarding the size and nature of the signatories:** As the signatories vary in their size and nature, the Code encourages them to commit to principles and actions that are relevant and manageable for their specific scope, size, business model, and resources, as well as actions which are targeted towards the specific risks they have identified. The pledges presented in this Code are not binding for trade association signatories, who commit to promote the Code among their members and encourage them to adopt its principles where appropriate.

**2.3 Statement of good faith:** This Code reflects a shared commitment among all signatories, who pledge to uphold honesty, integrity, and the values of transparency and responsibility in online accommodation reviews. The Code embodies a spirit of cross-sectoral collaboration.

Signatories hereby recognise their collective and individual responsibilities towards fostering trust and transparency in online reviews systems, and to collaborate in combatting fake reviews.

**2.4 Proportionate effort:** Signatories commit to make an effort to take action, in line with these principles, which they will uphold by building on best practices and knowledge available.

**2.5 Stakeholder collaboration (information sharing):** Signatories recognise that all parties should work together to share information, with the aim to identify challenges and solutions, including best practices (e.g. insights on bad actors' techniques and tactics, internet service providers and platforms facilitating fake reviews sales and purchases, threats, technical capabilities, relevant data on fake, reviewed, and removed reviews). Signatories will ensure that no content infringing legislation, around data privacy data or business sensitive information is shared.

**2.6 Stakeholder collaboration (awareness raising):** Signatories will cooperate to disseminate awareness-raising campaigns about this Code, its achievements, and emerging challenges, as well as relevant obligations under EU legislation. Signatories may refer to the Code of Conduct in other jurisdictions, as well as to National Authorities or business users where relevant. This cooperation will be conducted through various channels, including but not limited to the Stakeholder Network (further defined in Principle 3.1).

**2.7 A dynamic and futureproofed Code:** Signatories agree to collaborate, on updating the Code, if and when necessary, as developments and technological advancements bring new challenges or changes to the sector. Such updates will be discussed within the Stakeholder Network (Principle 3.1).

For the purpose of this Code, signatories have established a shared understanding of certain terms, relevant to online reviews and ratings. While not legally binding, these terms represent the common understanding of the Signatories within the context of this Code. They are included in Annex 1 for clarity.

## 3. Governance of the Code of Conduct

The signatories agree to principles of governing the Code to ensure it is futureproofed and can adapt to developments in the industry. Signatories therefore commit to take the following actions:

**3.1 Stakeholder Network:** Signatories will establish a Stakeholder Network, with the participation of the European Commission and with the chair rotating between stakeholders. The Network will convene its first meeting within five months of the Code's signing. Subsequent annual meetings will be scheduled by the Network itself. The purpose of this Network will be to foster information exchange between the signatories including on implementing the **Horizontal Principles** outlined in **Section 2** of the Code.

**3.2 Communication framework for the Stakeholder Network:** During the first Stakeholder Network meeting, the signatories will agree on a formalised communication channel.

**3.3 Withdrawal from the Code:** Any signatory may withdraw from this Code by notifying the Stakeholder Network. The withdrawal will be effective after a notice period which will be defined by the Stakeholder Network, allowing signatories sufficient time to update the Code accordingly and to inform and discuss with all signatories. A withdrawal of one signatory does not impact the commitments of the remaining signatories. The signatories and the European Commission will ensure that former signatories do not use the Code branding in their communication after their withdrawal.

**3.4 Inclusion of new signatories:** Recognising that the initial signatories do not represent the entire sector, the Stakeholder Network will encourage the promotion of the Code to attract a broad range of relevant and interested stakeholders. New signatories may join at any time by confirming the acceptance of principles outlined in the CoC to the Stakeholder Network, and ensuring alignment with the Code's principles. New requests to sign the Code of Conduct will be vetted and accepted on an ad hoc basis. Decisions will be based on a consensus from all the members of the Stakeholder Network and will depend on the full alignment of the new signatory to the relevant principles in the Code of Conduct.

**3.5 Ownership of the Code:** Signatories commit to take ownership of the Code by conducting self-assessments of their commitments and actions, on a voluntary basis.

**3.6 Adoption of new principles:** Signatories remain open to adopting new principles as they become relevant, feasible, and are deemed appropriate by all stakeholders involved. Adaptations to the Code of Conduct might also be initiated, in response to changes in the technological, societal, market, or regulatory landscape. Proposed principles will be discussed following a call by the European Commission or by members of the Stakeholder Network. Any new principles shall be proposed and integrated in the Code upon consensus of all signatories. Any proposed principle must also be wholly in line with existing legislation in this area.

**3.7 Impact of new legislation:** Any commitments under this Code shall be superseded by any formal guidelines issued by the European Commission and/or any new EU legislation that is introduced which wholly or partially contradicts the commitments made under this Code.

## 4. Principles endorsed by online platforms hosting accommodation reviews

Signatories who constitute online travel agents, online platforms, and meta-search engines that host first-party reviews, being those which are directly submitted by users directly to their sites, commit to taking the following action:

### Fake, misleading and harmful reviews

**4.1 Transparency in ratings systems:** Provide easily accessible and transparent information on the rating system, explaining to both consumers and business users how ratings are calculated. This information should be available on the page where the rating can be found and may be provided in a link to the information or in a 'hover over' or 'pop up' containing the information. Disclosure of this nature should be in line with requirements under existing EU law and formal guidance from the European Commission relating to these laws.

**4.2 Contribute to dealing with detrimental actors:** Establish and publish policies, steps and measures to mitigate the impact of bad-faith actors who undermine the integrity of online reviews, such as those engaging in review boosting and bombing or using review brokers, once these bad-faith actors come to their attention. This could include banning, blocking, suspending and/ or labelling accounts which repeatedly violate platform or company policies related to review and rating manipulation. The reasoning behind any enforcement measures will be clearly communicated to the user subject to such action, as required by the DSA<sup>1</sup>. Beyond enabling the flagging of and subsequent moderation or deletion of illegal content, this principle shall not constitute a general monitoring obligation or an obligation to carry-out fact-finding initiatives.

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<sup>1</sup> This is in line with the Article 14 and Article 17 of the DSA, Regulation (EU) 2022/2065 (2022)

**4.3 Sponsored and incentivised reviews:** Clearly label sponsored and incentivised reviews to maintain transparency for consumers.

**4.4 Star rating system:** Clearly distinguish between star ratings issued by official classification rating organisations, and user ratings to help consumers easily differentiate between the two.

### Anonymous, unverified reviews and reviews by non-staying guests

**4.5 Clear Complaints Process:** Ensure accommodation providers and consumers have access to a transparent process to flag policy-violating, fake, or false reviews to review-hosting platforms, as well as being able to flag illegal content. Users flagging such content should be able to do so through non-public channels (i.e. reporting forms, ...) and this process should be easily accessible to all users. Platforms commit to address these complaints and inform the user who flagged the review of any decision taken within a reasonable amount of time.

**4.6 Response Channels for Negative Reviews:** Establish policies and processes that provide stakeholders, including accommodation providers, with the ability to publicly respond to reviews. Such processes allow accommodation owners to address complaints or misunderstandings in reviews, ultimately benefitting future consumers, by providing additional information. Responses must comply with content standards and guidelines of the hosting platform.

**4.7 Communicate about processes in place to tackle fake reviews:** Provide all stakeholders, with publicly available information regarding the processes and approaches the signatories deploy to identify and tackle fake reviews. This will foster understanding of these measures and build trust in platforms and review-hosting websites. While signatories should ensure transparency around their processes for addressing fake reviews, they are not required to disclose business sensitive information, such as algorithms.

**4.8 Verification of review origin:** Signatories should take reasonable and proportionate steps to assess whether a review stems from an actual consumer experience with the accommodation provider in question. These efforts may include but are not limited to: having/requesting proof of purchase, requiring users to register before submitting a review, and deploying systems — whether manual, automated, or hybrid — that assess review authenticity through data signals such as but not limited to booking confirmations, behavioural patterns, or account activity, among others. It is understood that the specific measures adopted will vary based on each signatory's platform design and business model.

**4.9 Transparency in cases of pseudonymisation:** when anonymous reviews are published, allow only verified users<sup>2</sup> to leave a review and/or rating. Users must be able to post their reviews and ratings anonymously or pseudonymously. Policy-violating reviews can be discouraged by clarifying that while verified registered reviewers may use pseudonyms, their reviews remain traceable to the platform in cases of fraudulent or abusive behaviour.

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<sup>2</sup> Verified users are users for whom reasonable and proportionate steps have been taken to ensure that a reviewer has had an experience with the accommodation provider being reviewed. Examples of such steps have been elaborated in principle 4.8.



Furthermore, in such cases, platforms can use other detection methods based on unique identification attributes only available to the platforms themselves.

### Duration of processes to remove or challenge reviews

**4.10 Flagging fake, policy-violating and illegal reviews:** Establish clear mechanisms for accommodation providers and consumers, to report and flag to the platforms reviews that are fake, policy-violating, or illegal. All users flagging such content should be able to do so through non- public channels and easily accessible processes. The flagging of reviews will not motivate restrictive or suspensory measures to the given accommodation provider as a reaction to the flagging such as delisting or deliberate de-ranking, if the notice submitted is in line with the platform's terms and conditions.

**4.11 Timely review, removal or challenge processes:** Ensure that processes for removing or challenging reviews occur within a reasonable timeframe. The Stakeholder Network can provide further guidance on what such a reasonable timeframe would entail, considering different business models.

**4.12 Dispute resolution:** Set reasonable timeframes for the handling and removing of disputed reviews to ensure a prompt and transparent conflict resolution. The Stakeholder Network can provide further guidance on what these timeframes would entail, considering different business models.

### Relevance of reviews and ratings

#### **4.13 Prioritise most relevant reviews:**

Implement mechanisms that allow consumers to prioritise reviews based on various criteria, including but not limited to ranking by the most recent reviews. This enables and empowers consumers to focus on the most relevant reviews to them, without compromising the completeness of information. Signatories will adopt the mechanisms that best align with the specifics of their business model and share best practices with the Stakeholder Network.

**4.14 Transparency about measures for outdated reviews:** Where they exist, provide information on any processes or policies applied to avoid outdated reviews.

## 5. Principles endorsed by accommodation providers and their representatives

Signatories who are accommodation providers and host user-generated reviews and ratings for tourism accommodation, may also abide by parts of Section 4, aside from principles 4.5, 4.6, 4.11, 4.12.

All signatories who are accommodation providers or represent these stakeholders commit to taking the following action:



**5.1 Use of fake review brokers:** Refrain from generating fake reviews or engaging third parties to create fake reviews, including for reviewing their own or competitors' accommodation. Signatories acknowledge that trusted reviews benefit the entire industry, and that such practices undermine consumer trust, harm businesses, and violate the EU legislative framework.

Signatories representing accommodation providers commit to actively inform their members about the illegal nature of such practices under the UCPD<sup>3</sup>.

**5.2 Cooperation with platforms:** Collaborate with platforms to flag fake reviews where appropriate, while recognising that consumers who attempted to book - or booked but ultimately did not stay for whatever reason - may have legitimate reason to share their actual experience with the accommodation provider in a review, which should not be considered a fake review.

**5.3 Incentivised reviews:** Refrain from using disproportionate or conditional incentives to entice guests to leave biased reviews, as these can unduly skew the ratings. Signatories representing accommodation providers commit to actively inform their members about the detrimental nature of disproportionate and conditional incentives.

**5.4 Responding to negative reviews:** Utilise features which allow accommodation providers to respond to reviewers, including by addressing negative but legitimate reviews. Signatories acknowledge that negative reviews present an opportunity to demonstrate improvements, and even negative reviews must be respected. Responses must also be respectful and any response to a consumer review should comply with company user policies.

**5.5 Report illegal content:** Use the appropriate mechanisms to report illegal content including policy-violating or fake reviews where applicable<sup>4</sup>.

## Accurate and up-to-date information

**5.7 Update information:** Regularly update information about accommodation offered on platforms, particularly if businesses undergo changes such as renovations, change of management, change of name, or closure.

# 6. Monitoring and reporting

**6.1 Reporting provisions:** Signatories commit to report on their activities in line with relevant existing legislation, particularly the Digital Services Act (DSA). In addition, signatories can report according to their existing monitoring practices and any further processes they wish to develop. Signatories may choose to present their achievements with regards to the Code of

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<sup>3</sup> UCPD, Directive 2005/29/EC (2005)

<sup>4</sup> In line with the DSA obligation to report illegal content, in Article 3(h), Regulation (EU) 2022/2065 (2022)

Conduct to the public, including presenting innovative practices, emerging trends and challenges, as regards online reviews.

Reports should be written in clear and accessible language, or as otherwise specified in EU legislation, to facilitate the successful dissemination of information and promote the actions taken under this initiative.

**6.2 Effective date of the Code:** Signatories must implement the principles set out in this Code within a timeline agreed upon by the Stakeholder Network.

**6.3 First Stakeholder Network meeting:** A first meeting of the Stakeholder Network will take place within five months of the Code's signature.

**6.4 Organisation of the following Stakeholder Network meeting:** The Stakeholder Network will be responsible for agreeing on the frequency and the organisation of its subsequent meetings.

## 7. Enabling conditions

Signatories of this Code recognise that the work already undertaken by regulatory authorities enables the conditions necessary to facilitate the application of the Code's principles. Signatories may inform public authorities of their work under the Code, as well as any relevant challenges encountered.

### **Enabling conditions include:**

**Compliance awareness:** Public authorities are essential partners for accommodation providers and online platforms to ensure they are fully informed of their legal obligations including the information they must provide to consumers.

**Compliance checks:** Public authorities uphold a key function in monitoring platforms' and accommodation providers' adherence to EU regulatory provisions, including, but not limited to the Digital Services Act (DSA), Digital Markets Act (DMA), Unfair Commercial Practices Directive (UCPD), as amended by the Modernisation Directive, Platform to Business Regulation (P2B).

**EU and international collaboration:** Public authorities engage in collective efforts within the EU framework, such as Consumer Protection Network (CPC) meetings, sweeps, and online investigations, as well as participating in international initiatives addressing fake reviews.

**Respond to signals of fraudulent behaviour:** Public authorities can play a vital role in supporting signatories in the implementation of the Code by addressing fraudulent practices reported by online accommodation platforms, accommodation providers, consumer organisations, or other relevant actors.

# Annex 1 – Terminologies and definitions

Term	Definition
<b>Fake reviews</b>	Reviews which do not represent a first-hand, independent user experience but are rather written with the express purpose of upgrading or downgrading an accommodation provider or accommodation service provider through mechanisms such as, but not limited to, review boosting/bombing or using review brokers.
<b>Incentivised reviews</b>	Review produced in exchange for compensation or remuneration from the business/location being reviewed, or other persons working for or with that business/location (including, but not limited to, monetary payment, discounts, store credits or rewards offered 'in kind').
<b>Anonymous reviews</b>	Reviews which can be left without including the personal details of the reviewer, such as their name or a photograph. Anonymous reviews can include pseudonymised reviews. In cases of anonymous reviews, the identity of the reviewer is obscured to other users but remains traceable to platforms in cases of illegal content or other serious violations.
<b>Illegal content (in online reviews)</b>	Illegal content in online reviews refers to content which is not compliant with EU law or the law of a Member State, for example terrorist content, child sex abuse material, illegal hate speech, commercial scams and frauds or breaches of intellectual property rights. UNESCO provides the following list of examples of illegal and harmful content: hate speech, disinformation, misinformation, and content which incites or portrays genders-based violence" <sup>5</sup> . This content should be removed from websites, in accordance with other legislation. This differs from other content which may be damaging or negative in tone, but is not outright illegal and therefore is not required to be removed by law.
<b>Reviews in violation/incompatible with platforms' Terms and Conditions/ policy violating</b>	Policy-violating refers to content which infringes platforms' Terms and Conditions. Platforms are required to publish Terms and

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<sup>5</sup> UNESCO [Guidelines for regulating digital platforms: A multistakeholder approach to safeguarding freedom of expression and access to information](#), 2023

Conditions<sup>67</sup> along with a defined set of criteria, notably, as required by article 23 of the DSA to “set out [...] policy in respect of the misuse”. The DSA also require the Terms and Conditions to be adapted in order to respond to the specific systemic risks identified pursuant to Article 34<sup>8</sup>. Content which infringes the terms and conditions could include content which detrimental to users although it may not be illegal.

#### **Actual Consumer Experience**

Where an individual has used or purchased a product or service, as described in the amended version of the UCPD, Article 7.6.

Requires: “Where a trader provides access to consumer reviews of products, information about whether and how the trader ensures that the published reviews originate from consumers who have actually used or purchased the product shall be regarded as material.”

In order to determine that reviews have been submitted by consumer has actually used or purchased the product, the Guidance on the interpretation and application of Directive 2005/29/EC of the European Parliament and of the Council concerning unfair business-to-consumer commercial practices in the internal market provides a list of elements: “Such information could be, for example, a booking number. Other ‘reasonable and proportionate steps’ could include:

- requiring the reviewers to register;
- using technical means to verify that the reviewer is actually a consumer (e.g. IP address check, verification by email);
- setting clear rules for reviewers prohibiting fake and non-disclosed sponsored reviews;

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<sup>6</sup> The Regulation (EU) 2019/1150 of the European Parliament and of the Council of 20 June 2019 on promoting fairness and transparency for business users of online intermediation services (P2B Regulation), Article 2, defines Terms and Conditions as follows: “‘terms and conditions’ means all terms and conditions or specifications, irrespective of their name or form, which govern the contractual relationship between the provider of online intermediation services and its business users and are unilaterally determined by the provider of online intermediation services, that unilateral determination being evaluated on the basis of an overall assessment, for which the relative size of the parties concerned, the fact that a negotiation took place, or that certain provisions thereof might have been subject to such a negotiation and determined together by the relevant provider and business user is not, in itself, decisive;”

<sup>7</sup> The Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act), Article 2, defines Terms and Conditions as follows: “‘terms and conditions’ means all clauses, irrespective of their name or form, which govern the contractual relationship between the provider of intermediary services and the recipients of the service;”

<sup>8</sup> The Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act), outlines the following systemic risks: “

(a) the dissemination of illegal content through their services;

(b) any actual or foreseeable negative effects for the exercise of fundamental rights, in particular the fundamental rights to human dignity enshrined in Article 1 of the Charter, to respect for private and family life enshrined in Article 7 of the Charter, to the protection of personal data enshrined in Article 8 of the Charter, to freedom of expression and information, including the freedom and pluralism of the media, enshrined in Article 11 of the Charter, to non-discrimination enshrined in Article 21 of the Charter, to respect for the rights of the child enshrined in Article 24 of the Charter and to a high-level of consumer protection enshrined in Article 38 of the Charter;

(c) any actual or foreseeable negative effects on civic discourse and electoral processes, and public security;

(d) any actual or foreseeable negative effects in relation to gender-based violence, the protection of public health and minors and serious negative consequences to the person’s physical and mental well-being.”

- deploying tools to automatically detect fraudulent activity;

- having adequate measures and resources to respond to complaints about suspicious reviews, including where the trader concerned by the reviews provides evidence that they are not submitted by consumers who actually used or purchased the product."