



# Alaska Air Group

## Supplier Code of Conduct

Alaska Air Group, Inc. is the holding company of Alaska Airlines, Inc., Virgin America Inc., and Horizon Air industries, Inc.

# Alaska Air Group

## Overview

At Alaska Air Group, Inc. (AAG) we take great pride in caring for our companies' customers, communities, planet, and airlines. Our companies' suppliers provide countless functions across the AAG network and we rely on them to be safe, ethical, and to help us achieve our business goals. This Supplier Code of Conduct describes AAG companies' expectations of Suppliers.

## Compliance by Suppliers

Suppliers, their employees, sub-contractors, and agents must comply with this Code and with any applicable laws in the jurisdiction where the Supplier conducts business with, or on behalf of, AAG companies. Suppliers are required to self-monitor compliance with this Code and must be able to demonstrate and/or certify their compliance upon request.

## Labor Practices

- Suppliers must comply with minimum working-age laws; employees must not be younger than age 16.
- Suppliers must not discriminate against employees with regard to hiring or terms and conditions of employment on the basis of gender, race, religion, age, disability, sexual orientation, pregnancy, marital status, nationality, political opinion, veteran status, union affiliation, ethnic origin, or any other status protected by law.
- Suppliers must pay at least the legally required minimum wage and provide all legally mandated benefits relevant to where the work is performed, including withholding legally mandated amounts of taxes.
- Suppliers must abide by the maximum legally allowed number of working hours and overtime hours. Mandatory overtime must not impair the health or safety of employees. Adequate rest periods must be provided.
- Suppliers must respect their employees' freedom of association and their right to engage in, or refrain from, collective bargaining.
- Employees must be engaged on a voluntary basis without force or threat. Employees must not be required to make a monetary deposit as a condition of employment. Employees' identification and/or immigration documents must not be surrendered or withheld as a condition of employment.

## Safety and Health

- Suppliers must ensure a safe, violence free, and healthy working environment and comply with all applicable health and safety laws, including reporting requirements, training, and promoting safety. Suppliers must establish procedures, programs and systems to manage, track and report occupational injury and illness.
- The facilities provided must have adequate fire-safety, disaster, and other emergency precautions. Suppliers must provide adequate heating, air-conditioning, ventilation, emergency exits, first-aid supplies, toilets, and break-room facilities.
- Suppliers must prohibit the possession, use, or distribution of illicit drugs and alcohol when on the premises of, or performing duties for, AAG companies.
- Possession of weapons when on the premises of, or performing duties for AAG companies is prohibited, unless expressly required for job responsibilities or otherwise required to be allowed by law.

# Alaska Air Group

## Business Practices

- Suppliers must create true and accurate financial statements and keep business records including invoices, payment receipts and shipping documentation that are in accordance with accepted accounting principles of the jurisdictions in which they operate.
- Suppliers may only use software, hardware, and content that is legitimately acquired, and must comply in all respects with the applicable license terms.
- Suppliers must not trade, or encourage others to trade, in AAG stock (NYSE: ALK) if they possess material inside information that is not available to the investing public.
- Suppliers may not make, or allow their employees to make, gifts of any item of value if the gift is intended or may be perceived as an effort to influence an AAG company's business decisions. Token gifts may be made if their value is less than \$100.
- Suppliers may not offer, or allow their employees to offer, anything of value to influence a foreign official, including any employee of an entity owned entirely or in part by the foreign nation.
- Suppliers must treat all information acquired in the scope of providing services to AAG companies as confidential and may not use it for any other purpose.
- Suppliers must respect the privacy of AAG companies' customers, employees, and any other individuals who provide personal information to AAG companies. Suppliers will not use such personal information for any purpose without AAG specific approval.

## Diversity, Equity, & Inclusion (DEI)

- Suppliers must be committed to diversity, equity, and inclusiveness, including working with suppliers who share in its commitment.
- Suppliers must employ fair and ethical practices in the engagement of down-stream suppliers, including bid evaluation, negotiation, award decision, and supplier management.
- Suppliers must make a good faith effort to develop internal diversity programs including recruiting, retaining, and promoting qualified women and people of color.
- Suppliers must strive for a diverse and inclusive supply chain and use diverse subcontractors and business partners whenever possible.

## Corporate Social Responsibility

- Suppliers must comply with all environmental laws in the applicable jurisdictions in which they operate.
- Suppliers must have policies and programs designed to lessen their environmental impact, reduce waste, and foster social and economic development of communities in which they operate. This should occur through sustainable innovation by ensuring a commitment to making choices that have a positive impact on communities.

## Reporting

- Suppliers, their employees, sub-contractors, and agents are encouraged to report situations where there is possible conduct that is not in keeping with the law or this Code. Suppliers must report known findings of non-compliance related to work performed for AAG companies. This can be done by calling the Ethics and Compliance hotline at 888-738-1915 or by filing a report at [this link](#).