



Alaska Air Group

Supplier Code of Conduct

Alaska Air Group, Inc. is the holding company of Alaska Airlines, 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, subcontractors, and agents must comply with this Code and with any applicable laws in the jurisdictions 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 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.

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 items 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.

Supplier Representation

- Suppliers must be committed to advancing representation efforts, including working with suppliers who share in their commitment.
- Suppliers must employ fair and ethical practices in the engagement of suppliers including bid evaluation, negotiation, award decision, and supplier management.
- Suppliers must make a good faith effort to develop internal employee representation programs to the extent allowed by law.
- Suppliers must strive for a supply chain that reflects a wide range of perspectives and use diverse subcontractors and business partners to the extent reasonably and lawfully 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.

Respecting Human Rights

- At AAG we are committed to conducting our business with integrity, respect, and accountability. We uphold the highest ethical standards and comply with all applicable laws and regulations in the countries where we operate. We recognize our responsibility to protect and promote human rights and dignity in our operations and supply chain.
- We have a zero-tolerance policy for any form of human trafficking, forced labor, or slavery in our business activities and in our supply chain, and we condemn all forms of exploitation of children. We expect our employees, contractors, suppliers, and vendors to share our commitment by upholding our values, and supporting us in our fight against human trafficking, forced labor, and slavery.
- We encourage stakeholders to report any concerns or suspicions of violations of our policy through our Ethics Hotline, law enforcement, or the National Human Trafficking Resource Center (NHTRC) at 888-373-7888.
- We are committed to continuous improvement and transparency in our efforts to prevent and combat human trafficking, forced labor, and slavery. We welcome feedback and suggestions from our stakeholders.

Reporting

- Suppliers, their employees, subcontractors and agents are encouraged to report situations where there is possible conduct that is not in keeping with the law of 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.