

The
JetBlue
Code of Conduct

TABLE OF CONTENTS

MESSAGE FROM OUR CEO 3

OUR COMPLIANCE PROGRAM 5

- Our Values
- The Code of Conduct
- Ethics & Compliance Program

OUR DUTY TO COMPLY & REPORT 10

- Our Reporting Responsibilities
- How to Report Concerns
- How JetBlue Investigates Violations
- Consequences of Violations
- Preventing Retaliation at JetBlue

OUR CREWMEMBERS18

- Keeping Crewmember Information Secure
- Equal Employment Opportunity
- Drugs & Alcohol
- Harassment & Discrimination
- Using Social Media

OUR COMPANY24

- Conflicts of Interest
- Related Transactions
- Insider Trading
- Recordkeeping, Financial Integrity & Fraud
- Protecting JetBlue’s Assets
- Intellectual Property (Patent, Trademarks & Copyrights)
- Confidential & Proprietary Information
- Privacy
- Compliance with Laws
- Compliance with Policies
- Gifts

OUR COMMUNITY & PUBLIC38

- Crewmember Political Activities
- Media, Analyst, Investor & Public Inquiries
- JetBlue in Action
- Human Rights & Labor Practices

OUR INDUSTRY 44

- Fair Dealing
- Antitrust & Competition Laws
- Competitive Information
- Anti-Bribery & Corruption Laws
- Trade, Commerce & Sourcing
- Government Contracting

RELATED POLICIES 52

- Compliance**
 - Business Integrity Hotline
 - Code of Ethics
 - Gift Policy
- Crewmember**
 - Crewmember Blue Book
 - Drug & Alcohol Policy
 - Social Media Policy
- Company**
 - Contract Review Policy
 - Document Retention Policy
 - Insider Trading Policy
 - IT Policies
 - P-Card Policy
 - Privacy Policy
 - Related Persons Transaction Policy
 - Signature Authorization Policy
 - Software Management Policy
 - Sourcing & Purchasing Policy
 - Subpoena & Information Request Policy
 - Travel & Expense Policy
- Community**
 - Political Contributions Policy
 - Responsibility Report
- Industry**
 - Anti-Bribery & Corruption Policy

LETTER FROM OUR CEO

Dear Crewmembers,

At JetBlue, our Values are deeply embedded in our culture and influence every decision we make. Our long-term success is dependent on our integrity. Every day, our many stakeholders around the world – Crewmembers, Customers, Business Partners, Owners, and regulators—count on our commitment to the highest standards of business ethics and compliance. By living up to our Values and high ethical standards, we ensure that our company is positioned to flourish for years to come.

Whatever our role at JetBlue, the judgments we make reflect on our reputation and are critical to our success. I am counting on your commitment to embrace and drive a culture in which we continue to grow our business consistent with our Values and, of course, legal requirements, in all markets that we serve.



We all recognize that our heavily regulated industry is always changing, and that in many cases, the rules are complex and strictly enforced. For these reasons, I encourage every Crewmember to ask questions and raise concerns at the time they arise to ensure that we are always comfortable with our conduct. Further, we believe our reputation speaks for itself, and we endeavor to maintain that level of integrity through honest and ethical personal and business practices.

A company either earns the right to keep operating or it doesn't—it's just that simple in the business world. While many companies can generate a profit and create value for their owners, that alone is not enough for us. At JetBlue, our definition of success both includes and goes beyond basic financial metrics - we aim to Inspire Humanity. We believe that mission touches our Customers, our Communities, and our Crewmembers. Being successful at that mission truly makes us a different kind of organization and positions us for blue skies ahead.

Please take time to read and fully understand our Code. It sets forth the core principles that govern all of us. It also identifies the many resources available to help us understand how these principles relate to our jobs. We must all conduct JetBlue's business according to these principles. Our long-term viability depends on it, and we will be a stronger, more competitive company as a result.

Thank you in advance for your compliance and support. Your commitment is absolutely critical to our continued success.

Warmest Regards,

Robin Hayes, Chief Executive Officer JetBlue



PREPARE FOR TAKEOFF

Our mission at JetBlue is to **Inspire Humanity.**

Let's take flight together.



Our Compliance Program

Section 1: Our Values

Section 2: The Code of Conduct

Section 3: Ethics & Compliance Program

Our Values

SAFETY • CARING • INTEGRITY • PASSION • FUN

JetBlue's foundation is built on our Values; Safety, Caring, Integrity, Passion, and Fun. We use our Values to guide our actions, set us apart from our competitors, and help us deliver superior Customer and Crewmember experiences.

- **Safety** always comes first. We each hold the title of Chief Safety Officer. It's everyone's job to ensure a safe environment and experience for our Customers and each other.
- **Caring** is what brings the JetBlue Experience to life. Respect and understanding are the core of who we are.
- **Integrity** is not only doing things right, but it's doing the right thing. This includes making ethical decisions, even when they aren't always popular, and to always act in JetBlue's best interest. It's the only way to do business, so we communicate openly and honestly. That's how we earn trust – from each other and our Customers.
- **Passion** is what keeps our customers coming back. JetBlue is more than just an airline. We deliver a great experience and an excellent product with dedication and enthusiasm.
- **Fun** is what makes our workplace enjoyable. The equation is simple: when we enjoy our jobs, our Customers enjoy the JetBlue Experience.



The Code Of Conduct

SAFETY • CARING • INTEGRITY • PASSION • FUN

Why does JetBlue have a Code of Conduct?

Our Code of Conduct (this document) sets the business, personal, and professional standards we, as JetBlue Crewmembers and representatives, must follow. It highlights our Values and is a starting point to help us make the right decisions and resolve ethical or compliance issues we may encounter.

Who Should Follow the Code?

Simply put, everyone involved with JetBlue! All Crewmembers, Crewleaders, Officers, and Directors must act according to the principles in our Code. We expect everyone working on our Company's behalf, including consultants, agents, and Business Partners, (sometimes called vendors and suppliers elsewhere), to follow to our ethical standards. We may never ask a third party to take part in any activity that violates these standards.

What are my responsibilities as a JetBlue Crewmember?

JetBlue Crewmembers are expected to know and follow the current laws, regulations, standards, policies, and procedures that affect our work.

In addition to the Crewmember responsibilities, Crewleaders are expected to:

- Model, coach, and require ethical conduct within their teams;
- Be available and receptive to Crewmember ethics and compliance concerns;
- Follow reporting guidelines; and
- Contact JetBlue's Ethics and Compliance team with any questions they're unable to answer.

What is expected of our Business Partners?

JetBlue Business Partners are expected to follow the JetBlue Code of Conduct. To support their use of our Code, a separate Business Partner Code of Conduct is available on JetBlue.com and on Comply365.

Senior Financial Leaders

- Code of Ethics

In addition to the Code of Conduct, all senior financial leaders are expected to abide by the Code of Ethics. JetBlue's Board of Directors must approve any amendment or waiver of our Code of Ethics.

The Code Of Conduct

SAFETY • CARING • INTEGRITY • PASSION • FUN

Helpful Tips

We've added a few extras to help make the Code easier to use. Throughout the Code you may see the icons below. Here's what they're for:



What Should I Do?

These are fictional examples of situations that could theoretically come up, and the best way to handle them. They're here to make it easier to understand how policies affect us.



Definitions and explanations

We added definitions and explanations in some sections to make sure we're all on the same page.



I Have a Question

Contact info for help on this subject can be found by this symbol.



Related Resources

Links to related training, policies, pages, and other resources may be included in some sections.

Safety – Caring – Integrity – Passion – Fun

To help bring our values to life, we've highlighted the values that are most related to each section. They're at the top of the page from Chapter 2-on.

Feedback

The Code belongs to all of us. Please share your thoughts and questions about this document by emailing us at BlueEthicsandCompliance@jetblue.com. We value your feedback and look forward to hearing from you!

Need Help?

It's our pleasure. Contact the [Ethics & Compliance team](#) for assistance reading or understanding this document.

ES ¿Necesita ayuda?

El placer es nuestro. Póngase en contacto con [el equipo de Ética y Cumplimiento](#) para obtener ayuda para leer o comprender este documento.

Ethics & Compliance Program

SAFETY • CARING • **INTEGRITY** • PASSION • FUN

JetBlue's Ethics and Compliance program demonstrates our company's pledge to the highest level of Integrity. Our Code of Conduct is the base of this program.

The Ethics & Compliance team within the JetBlue Legal Department manages the program by:

- Maintaining the JetBlue Code of Conduct and other corporate policies;
- Collaborating with stakeholders to promote an ethical culture;
- Engaging JetBlue Crewmembers through education and outreach activities, including annual training on the Code and corporate policies;
- Conducting Business Partner due diligence;
- Monitoring domestic, enterprise-wide regulations; and
- Administering the Business Integrity Hotline.



Big-picture:

JetBlue has this program to help make sure our commitment to Integrity is being upheld in every part of our company - a commitment that goes far beyond simply following laws and regulations.



Learn more about JetBlue's Ethics & Compliance program, on [HelloJetBlue](#).



Contact: BlueEthicsandCompliance@jetblue.com



Our Duty To Comply and Report

Section 1: Our Reporting Responsibilities

Section 2: How to Report Concerns

Section 3: How JetBlue
Investigates Violations

Section 4: Consequences of Violations

Section 5: Preventing Retaliation
at JetBlue

Our Reporting Responsibilities

SAFETY • CARING • **INTEGRITY** • PASSION • FUN

Every Crewmember, Crewleader, Director, Officer, member of our Board, and any other individual affiliated with JetBlue must always:

- Follow all applicable laws, regulations, the JetBlue Code of Conduct, and JetBlue policies and procedures;
- Offer their complete cooperation with any investigation by JetBlue, and/or our regulatory and governing authorities; and
- Report to the Ethics & Compliance team or the Business Integrity Hotline any actual or suspected violations of this Code, JetBlue's policies, or any applicable law.

We must also report any other compliance-related issues, including but not limited to, conflicts of interest, fraud, or other misconduct of any type.

All JetBlue Crewmembers must accept the responsibilities above as a condition of our employment. By entering the compliance code for this document in Comply365, you agree to follow these terms in good faith, to the best of your ability – and request support from a JetBlue Leader when you cannot.

NOT SURE WHAT TO DO? We should ask ourselves these questions:



NOT SURE? Talk to your Crewleader or contact the [Ethics and Compliance team](#) for guidance.

Our Reporting Responsibilities

SAFETY • CARING • INTEGRITY • PASSION • FUN



REMEMBER!

There is no excuse for an illegal or unethical act. Even if we think JetBlue could benefit from the act, or we commit such an act because someone else told us to do so, is no defense.

Knowingly making false accusations of illegal or unethical acts is a serious violation of the Code of Conduct. Doing so weakens our reporting process and can harm people's reputations.

How To Report Concerns

“What type of concern or question do I have?”	“Who can I talk to about this?”	“How do I get in touch with them?”
Anything	Your Crewleader	<p>Start by talking to the person who best understands your job: your Crewleader</p> <p><i>Crewleaders have a duty to act on reports and are required to use the methods below to document Crewmember concerns</i></p>
If your Crewleader is unable to help, or if you want to report something directly:		
Accounting and financial matters Internal controls and auditing Questions about JetBlue policies or other compliance topics *Violations (or suspected violations) of the JetBlue Code of Conduct*	JetBlue Business Integrity Hotline <i>A confidential and anonymous program that is operated by an independent Business Partner and available 24/7</i>	1-866-318-7453 -or- https://app.integritycounts.ca/org/JetBlue Reports are routed to the appropriate JetBlue leaders for investigation Learn more on HelloJetBlue
	Ethics & Compliance Team	BlueEthicsandCompliance@jetblue.com Learn more on HelloJetBlue Reports of violations or suspected violations may be submitted confidentially or anonymously in writing to: JetBlue Airways Corporation 27-01 Queens Plaza North Long Island City, NY 11101 Attn: Ethics & Compliance Manager (Confidential)

How To Report Concerns

SAFETY • CARING • INTEGRITY • PASSION • FUN

“What type of concern or question do I have?”	“Who can I talk to about this?”	“How do I get in touch with them?”
Cyber-security threats	IT	CISO@jetblue.com
Equal employment opportunity, respectful workplace, harassment, discrimination	Crew Relations	1-877-241-2430 CrewRelations@jetblue.com
Laws and acceptable business practices	JetBlue General Counsel /Legal Department	BlueLegal@jetblue.com
Security emergencies or other urgent matters including threats and all suspicious activity within the JetBlue system Drug and alcohol use on duty or where there’s an immediate safety concern	BlueWatch	Urgent issues: 1-866-255-2739 General questions: BlueWatch@jetblue.com
Workplace Safety	JetBlue Safety Team	1-866-530-8470 SafetyDept@jetblue.com



Bookmark the [Crewmember Reporting Methods page](#) on HelloJetBlue

How JetBlue Investigates Violations

SAFETY • CARING • **INTEGRITY** • PASSION • FUN

JetBlue will quickly investigate any reported potential violations of our Code of Conduct and related policies and procedures.

Reports are routed to the most appropriate group to investigate, depending on the subject. All reports will be kept confidential to the fullest extent possible, consistent with the need to conduct an adequate investigation.

Crewmembers are expected to fully cooperate in any investigation. Any effort to harm or tamper with an investigation must be reported to the Business Integrity Hotline.

The Audit Committee of JetBlue's Board of Directors is responsible for addressing any reports of suspected violations relating to accounting, auditing or other financial matters, in accordance with policies and procedures established by the Committee.

WHAT SHOULD I DO?

My Crewleader said there's an investigation taking place and that I should be vague if I'm asked anything. We've been talking about my career growth and I don't want to make my team look bad. What should I do?

It's an uncomfortable position to be in. What your Crewleader told you must be reported to the Business Integrity Hotline. Everyone at JetBlue is expected to cooperate with an investigation – participating in good faith should not affect your career, unless you're found to be knowingly involved in wrongdoing.

See the "Preventing Retaliation" section of this Code for more detail.

Consequences of Violations

SAFETY • CARING • INTEGRITY • PASSION • FUN

We should always aim to do what is allowed, acceptable, and expected of us. This means trying to always use ethical judgment and common sense. Violations of this Code of Conduct, or of the policies referred to in this Code, may result in eGuidance up to and including separation of employment, where legally permitted and applicable, and possible criminal prosecution.

Examples of conduct that may result in disciplinary action:

- Allowing or being involved in actions which violate JetBlue's Code of Conduct or policies;
- Ignoring, failing to report, or refusing to report a violation of JetBlue's Code of Conduct or policies;
- Refusing to cooperate in an investigation of an alleged violation of JetBlue's Code of Conduct or policies;
- Knowingly making a false accusation with the sole purpose of harming or retaliating against another Crewmember; or
- Retaliating against someone for reporting a violation (or possible violation) of JetBlue's Code of Conduct or policies.

WHAT SHOULD I DO?

I think someone made a false report in order to get me in trouble. What should I do?

All investigations are handled professionally and objectively. Intentionally making a false accusation is a serious violation and may lead to disciplinary action, up to and including separation of employment, where legally permitted and applicable.

This concern should be reported to your Crewleader or the Business Integrity Hotline.

I observed a situation that I suspect violates our Code. Do I have to report this even though I'm not directly involved or even sure there is a problem? What should I do?

Crewmembers are responsible for immediately reporting possible violations once known using the "How to Report Concerns" section of this document.

Your report will be taken seriously and investigated appropriately. It's better to report a suspicion with good intentions that turns out not to be an issue than to ignore a possible violation of the law or our policy.

Preventing Retaliation at JetBlue

Crewmembers who raise concerns help JetBlue to correct small problems before they grow into larger ones. It can take courage to raise an issue relating to a violation, or a suspected violation, of our Code and we know it can be a difficult choice. That is why we are committed to ensuring that JetBlue Crewmembers will not face retaliation, reprisals, or any career disadvantage for reporting a suspected violation in good faith.

Raising a concern in **good faith** means a genuine attempt has been made to provide honest and accurate information, even if it's later proven to be incorrect. The fact that a Crewmember raises concerns in good faith, or provides information in an investigation in good faith, cannot be a basis for separation of employment, demotion, suspension, threats, harassment, discrimination, or any other type of retaliation, as such retaliation is strictly prohibited.

However, if a Crewmember knowingly files a false or misleading report, or intentionally provides false or misleading information or otherwise obstructs an investigation, that Crewmember may be subject to disciplinary actions.

Any suspicion or indication of retaliation must always be reported to a Crewleader, [Ethics and Compliance](#), or the [Business Integrity Hotline](#).

WHAT SHOULD I DO?

I am afraid that my career at JetBlue will end if I raise an ethics or compliance concern. How can I know this won't happen?

JetBlue leaders are committed to maintaining an open environment where concerns can be raised in good faith without negative consequences for the person doing so.

JetBlue leaders will quickly respond to all reports of retaliation and take action.

Retaliation by any JetBlue Crewmember or Crewleader is not tolerated and must be reported to Ethics and Compliance or the Business Integrity Hotline.



Our Crewmembers

Section 1: Keeping Crewmember
Information Secure

Section 2: Equal Employment Opportunity

Section 3: Drugs & Alcohol

Section 4: Harassment & Discrimination

Section 5: Using Social Media

Keeping Crewmember Information Secure

During the course of our employment, we provide personal, medical, and financial information to the Company. JetBlue is committed to protecting this information. Common examples of confidential Crewmember information include (but are not limited to):

- Job applications;
- Benefits information;
- Compensation;
- Medical records;
- Social security numbers; and
- Contact information, such as home addresses and telephone numbers.

Crewmembers' confidential information can only be accessed with specific authorization based on a business need. If we access this information during our jobs, we must keep it safe. We only use that information when it's needed to complete our work. We also must follow any laws related to this area.

At a minimum:

- Computers with access to confidential information should be encrypted and password protected.
- Files with confidential information should only be shared using JetBlue systems (such as Outlook or OneDrive) and never stored outside our network.

WHAT SHOULD I DO?

A Crewmember said they were having trouble downloading Crewmember files from OneDrive onto their personal computer while working remotely. It doesn't sound like something they should be doing, but it also doesn't really involve me. What should I do?

While it might be awkward and it may be an innocent mistake, you should let the Crewmember know they should stop downloading that info, securely delete any files they've downloaded, and only use their JetBlue-issued laptop in the future.

If the behavior continues, notify your Crewleader or [IT Security](#).



Review our IT Policies on the HelloJetBlue [Corporate Policies](#) page.

Equal Employment Opportunity

SAFETY • CARING • INTEGRITY • PASSION • FUN

JetBlue is committed to maintaining a friendly, safe, and equitable working environment in which each of us is treated with integrity, fairness, and respect, free from any type of harassment or discrimination.

JetBlue is committed to fair, equitable, and unbiased employment practices in the hiring, advancement, and compensation of Crewmembers.

JetBlue provides equal employment opportunity for all individuals relating to recruiting, hiring, training, and career advancement, and for all other terms and conditions of employment including, but not limited to, compensation, benefits, and eGuidance.

JetBlue expects all of our Crewmembers to honor our Equal Employment Opportunity policy and to treat each other, our Business Partners, Customers and all others with respect in a non-discriminatory manner and without regard to age, citizenship status (in compliance with applicable law), disability or perceived disability, ethnicity, gender identity or expression, genetic information, marital status, nationality, pregnancy, race, religion, sex, sexual orientation, skin color, veteran status, or any other characteristic protected by law.

WHAT SHOULD I DO?

I applied for a job in a different department where the team was made up of seven male-identifying Crewmembers. I received a rejection letter (I identify as female) while an offer was extended to a man. I have many more years of education and experience than the other candidate. I feel I was discriminated against because of my gender. What should I do?

If you believe you're being discriminated against, report your concern to your Crewleader, Crew Relations, or the Business Integrity Hotline.

Discrimination has no place at JetBlue.



Learn more about JetBlue Equals on [JetBlue.com](https://www.jetblue.com/equals)

Drugs & Alcohol

SAFETY • CARING • INTEGRITY • PASSION • FUN

The safety of our Customers Crewmembers, and Business Partners is our #1 priority. JetBlue strives to maintain a drug-free workplace by enforcing a strict, zero-tolerance, anti-drug, and alcohol policy.

Drugs

JetBlue's [Drug and Alcohol Policy](#) (DAP) prohibits the use, manufacture, distribution, sale, or possession of narcotics, drugs, controlled substances, paraphernalia, and literature that promotes illegal drugs and substance use.

JetBlue requires a pre-employment drug screening for all Crewmembers, and may perform further random drug tests throughout our employment, to ensure a drug-free workplace. Crewmembers who perform safety-sensitive functions as specified under the [DOT/FAA Anti-Drug and Alcohol Program](#) are subject to testing under JetBlue's DOT policy related to that program, in addition to the corporate (non-DOT) policy.

Alcohol

JetBlue's DAP prohibits any use of alcohol that adversely affects a Crewmember's job performance, or is within eight hours of a Crewmember reporting for work, reserve, training, or other opportunities representing JetBlue.

JetBlue also prohibits the unauthorized use of alcoholic beverages on JetBlue's premises during business hours for both on-duty and off-duty Crewmembers. Accordingly, at no time may Crewmembers consume alcohol while wearing or displaying any part of their uniform, including a JetBlue ID or JetBlue-issued clothing that would identify them as a JetBlue Crewmember.



JetBlue's anti-drug and alcohol policy prohibits the prescription or recreational use of cannabis products or marijuana with no exceptions, even if legal at the state or local level.

WHAT SHOULD I DO?

I suspect a fellow Crewmember is coming to work under the influence and may even be drinking on the job. I'm concerned for this Crewmember's health and safety. What should I do?

This scenario implicates our number one value: Safety. If you have reasonable suspicion that a Crewmember is intoxicated, you should immediately consult your Crewleader who will take appropriate steps to address the situation.

If you believe the CM is in immediate danger of harming themselves or others, notify [BlueWatch](#) at 1-866-255-2739.

Harassment & Discrimination

SAFETY • CARING • INTEGRITY • PASSION • FUN

Each of us is personally responsible for preventing discrimination and harassment. Harassment and discrimination are forms of misconduct that disrupt and harm the workplace because of a person's age, citizenship status (in compliance with applicable law), disability or perceived disability, ethnicity, gender identity or expression, genetic information, marital status, nationality, pregnancy, race, religion, sex, sexual orientation, skin color, veteran status, or any other characteristic protected by law.

Every Crewmember has the right to work in an environment free from unwanted and unwelcome harassment and discrimination. JetBlue strictly prohibits all forms of harassment and discrimination and will not tolerate it in our workplace. We encourage open communication to resolve questions, concerns, and complaints involving discrimination and harassment and are committed to promoting equity and equal opportunity.



Harassment:
Inappropriate pressure, bullying, or intimidation

Discrimination:
Unfair treatment of people based on protected characteristics

WHAT SHOULD I DO?

One of my team members has a habit of telling jokes that some of us see as inappropriate. The jokes offend me and others in our group. What should I do?

Humor is personal, the other Crewmember might not even realize they are being hurtful. You have the option of discussing your feelings with that Crewmember. If you are uncomfortable speaking to the Crewmember, or if the Crewmember doesn't respond to your request to stop, you should talk to your Crewleader or [Crew Relations](#).

I supervise a small team. One of my direct reports is having performance problems but I fear giving a negative review would cause discrimination accusations, as they appear to be a part of an ethnic minority group different from my own. What should I do?

Crewleaders should review Crewmember performance with integrity, and provide consistent and fair feedback to everyone without discrimination.

If you believe a Crewmember is having performance issues relative to their peers, questions about our Respectful Workplace policies, or Crewmember evaluations, can be directed to [Crew Relations](#).

JetBlue understands we are passionate and may wish to express ourselves online. While JetBlue respects the right to personal expression, all Crewmembers must avoid behavior that could harm our company.

- Our activity online must follow JetBlue’s conduct-related policies including Insider Trading, Confidentiality, Equal Employment Opportunity, Harassment, Values, etc. as noted in the [Crewmember Blue Book](#).
- Failure to follow the Social Media Policy may result in eGuidance up to and including separation of employment, where legally permitted and applicable.
- Crewmembers are welcome to share and interact-with public JetBlue content, including JetBlue social media accounts (e.g. sharing, liking, retweeting, or forwarding content) from sites like Facebook, Instagram, and Twitter.
- Content designated for JetBlue internal use may never be publicly shared (e.g. internal email, posts on HelloJetBlue, confidential documents) unless that content includes permission to do so.
- If we observe another Crewmember who appears to be violating JetBlue’s social media policy, we should report this immediately to [Crew Relations](#).



Easy self-check:

Before posting, sharing, liking, or commenting, we should ask ourselves; “is this something I would want someone to say about me or a member of my family?”

If the answer is anything other than “yes,” simply don’t post, like, comment, or share!

PERSONAL DISCLAIMER

If we choose to identify ourselves as JetBlue Crewmembers or discuss our employment online, we must always include a note that the views expressed do not necessarily reflect the views of JetBlue. (e.g. “I am speaking for myself and not JetBlue.”) However, certain statements are inappropriate no matter the situation, and even a disclaimer would not protect us from legal consequences. In those cases, it’s best not to say anything.

BLOGS

Crewmembers with personal blogs that identify them as JetBlue Crewmembers must clearly note their blog is not a company-sponsored source of communication. Otherwise, Business Partners, Customers, and others may mistakenly view them as JetBlue spokespeople.

JetBlue reserves the right to monitor our use of company-provided hardware and to decide if any online activity violates our policies or Values.



Learn more about Social Media in the [Crewmember Blue Book](#).



Our Company

Section 1: Conflicts of Interest

Section 2: Related Transactions

Section 3: Insider Trading

Section 4: Recordkeeping, Financial
Integrity & Fraud

Section 5: Protecting JetBlue's Assets

Section 6: Intellectual Property (Patent,
Trademarks & Copyrights)

Section 7: Confidential &
Proprietary Information

Section 8: Privacy

Section 9: Compliance with Laws

Section 10: Compliance with Policies

Section 11: Gifts

Conflicts Of Interest

Crewmembers must avoid situations that may cause us to act in ways that are not in the best interest of JetBlue. We should always make business decisions free from any perceived or actual conflict of interest.

A conflict of interest can occur when our outside activities or personal interests conflict, or appear to conflict, with our loyalty and responsibility to JetBlue. Whether a conflict of interest is present in a given situation depends on the particular circumstances involved. An outside activity would be considered a conflict of interest if it adversely impacts a Crewmember's business judgment, job performance, or JetBlue's reputation or relations with others.

Outside activities and personal interests that may present a conflict of interest include, (but are not limited to):



Conflicts of Interest:
Situations where the goals of two different people or groups are not compatible

Activity	How to manage it
Outside Employment & Activities: Working for, or providing services to a third party organization that is, or is seeking to become, a Business Partner, or competitor of JetBlue may put us in a situation where our interests are conflicted	<p>Participating in outside employment on company time or using JetBlue's resources to support outside employment is not allowed.</p> <p>We must ensure all outside activities are separate from, and do not interfere with, our commitment to JetBlue. <i>For example, if a Crewmember wants to work for an entity that is part of the travel industry, the potential conflict must be cleared with their Crewleader. The Crewleader must notify JetBlue's Ethics & Compliance team.</i></p>

Activity	How to manage it
<p>Employment of Close Relatives: If a Crewmember's close family relative (spouse or partner, parents/step-parents, child/step-child, sibling/step-sibling, aunt/uncle, niece/nephew, grandparent, grandchild, in-laws, etc.) is working or performing services for an organization that is, or is seeking to become, a Business Partner or competitor of JetBlue, a potential conflict of interest may exist.</p>	<p>Crewmembers should connect with JetBlue's Ethics & Compliance team.</p>
<p>Board Membership & Community Activities: Crewmembers are welcomed and encouraged to volunteer or serve on charitable or community related Boards of Directors if such service does not detract from our obligations at JetBlue. Sometimes, however, serving on a Board of Directors can create a conflict of interest or even other legal issues.</p>	<p>Before assuming a position on a Board, Crewmembers should consult with their direct Crewleader, the General Counsel or another member of JetBlue's Ethics & Compliance team. Even if a conflict of interest is not present, Crewmembers and Crewleaders must notify JetBlue's Ethics & Compliance team so we can ensure our Related Parties Database is maintained.</p>

Related Transactions

SAFETY • CARING • **INTEGRITY** • PASSION • FUN

All contracts or transactions entered into, or proposed to be entered into, with individuals that are “Related Persons” must receive the proper review by the Review Committee and, if required, approval by the Audit Committee.

Related Persons are defined in the [Related Persons Transaction Policy](#) as JetBlue Officers, Directors, members of the JetBlue Board of Directors, significant shareholders, and their immediate family members.



Related Person: JetBlue Officers, Directors, significant shareholders and their immediate family

Related Transaction: a business arrangement involving a Related Person

WHAT SHOULD I DO?

My spouse owns an interest in a potential Business Partner that JetBlue is considering doing business with. However, in my position, I will not have any decision making responsibilities as to which Business Partner is selected. Do I need to report anything?

Yes. All potential conflicts, and even the appearance of a conflict, can damage your reputation or that of the company and therefore must be disclosed in writing to both your Crewleader and JetBlue's [Ethics and Compliance team](#).

 Review our Related Person Transaction Policy on the [HelloJetBlue Corporate Policies](#) page.

Simply put, it is illegal for us to buy or sell securities (stocks, bonds, options, etc.) when we are aware of “inside information”—**material, non-public information**—relating to the securities. JetBlue’s Insider Trading policy prohibits both JetBlue Crewmembers and our Business Partners from using or sharing—either intentionally or accidentally—any inside information about JetBlue or one of our Business Partners..

These restrictions apply to the securities of **any** company, including JetBlue’s, and apply in any location.

Both JetBlue Crewmembers and JetBlue Business Partners are strictly required to follow the [Insider Trading Policy](#) and any applicable insider trading laws.

Information is considered “non-public” if it has not been adequately disclosed to the public. An explanation of public vs. non-public information is located in the Insider Trading Policy.

Crewmembers with questions on the Insider Trading Policy, their insider status, or their eligibility to trade must consult with JetBlue’s [Ethics & Compliance team](#).



Insider Trading: When someone who has material, non-public information about a company decides to buy or sell securities

Material Information: Any information that an investor might consider important in deciding whether to buy, sell or hold securities is classified as “material information.”



Review our Insider Trading Policy on the [HelloJetBlue Corporate Policies](#) page.

Recordkeeping, Financial Integrity & Fraud

SAFETY • CARING • INTEGRITY • PASSION • FUN

We have a legal responsibility to provide accurate and complete information. All information we record or report on JetBlue's behalf, for any purpose, must be true and accurate. JetBlue's financial records must conform to Generally Accepted Accounting Principles (GAAP), must be maintained in reasonable and appropriate detail, must be kept in a timely fashion, and must accurately and appropriately reflect our transactions. Falsifying records or keeping unrecorded funds and assets is never acceptable under any circumstances and may result in separation of employment and/or criminal prosecution, where permitted by law. When a payment is made, it can only be used for the purpose for which it was approved.



Fraud: lying, cheating, or acting dishonestly in order to benefit personally or financially

Additionally, our senior financial and executive officers must make accurate, complete, fair, timely and understandable disclosure in our public communications, including documents that we submit to our regulators.

JetBlue maintains a zero-tolerance policy for Crewmembers who engage in any scheme to defraud anyone of money, property or honest services. Fraudulent activity violates the law and carries severe penalties. Fraud can range from minor Crewmember theft to a significant misstatement of our earnings and holdings. Fraud can damage our reputation and net worth. All Crewmembers must report any instance of suspected fraud.

WHAT SHOULD I DO?

I learned that my VP recorded some of her expenses as “Crewmember training” when they were actually for entertainment. Since the total amount that was spent is accurate, is this a problem if the expense coding is not exactly correct? What should I do?

Yes, this could be a problem. Our books must be kept in reasonably accurate detail and reflect all of our transactions. False transactions or misrepresentations about our finances violate our Code and the law. Discuss your concern of the integrity of these payments with your Crewleader, [Corporate Audit](#) or the [Business Integrity Hotline](#).



Review our Anti-Fraud Policy on the [HelloJetBlue Corporate Policies](#) page.

Protecting JetBlue's Assets

SAFETY • CARING • INTEGRITY • PASSION • FUN

We should not treat JetBlue assets as our own personal property, nor should we use them for personal gain. We must never sell, transfer or dispose of JetBlue assets without proper documentation and authorization, which includes bartering of goods and services. All JetBlue assets, facilities or services should be used for legitimate business purposes and not for any unlawful, improper, or unauthorized reason. We must protect JetBlue issued laptops, phones, tablets, other devices, and company or airport-issued badges by not leaving them unsecured.

We must never take any of JetBlue business opportunities for our own personal advantage, nor direct them to a third party. All Crewmembers are responsible for helping to ensure JetBlue's computer systems and other technical resources are used appropriately.

In order to do our jobs, we use JetBlue property, equipment, and technology every day. All Crewmembers have a duty to safeguard these assets (e.g. facilities, equipment, laptops, tablets, phones and other devices, supplies, software, documents, intellectual property —patents, copyrights, trademarks and service marks, information systems, and confidential business information).

WHAT SHOULD I DO?

I suspect that a former coworker, who now works for a competitor, has shared JetBlue marketing data with her new employer. What, if any, action should I take?

If you are aware of anyone misusing or inappropriately disclosing JetBlue's intellectual property or confidential information, or have good reason to believe this is happening, you should promptly report your concerns to our [Legal Department](#) or the [Business Integrity Hotline](#).

I lost my laptop and/or mobile device that contains JetBlue business information.

Immediately notify the [IT Service Desk](#) (at 844-538-4873/ USA or 385-275-3364/ International) and your immediate Crewleader.

Intellectual Property (Patent, Trademarks & Copyrights)

SAFETY • CARING • INTEGRITY • PASSION • FUN

Protecting both JetBlue and other's intellectual property is essential to maintaining our competitive advantage and for treating others with respect and integrity. Intellectual property includes patents, trademarks, trade secrets and copyrights, as well as technical knowledge, know-how and experience developed in the course of a Crewmembers employment. We are expected to support the establishment, protection, maintenance and defense of JetBlue's intellectual property rights and to use those rights in a responsible way. Intellectual property includes multimedia such as video and audio recordings, software, or written documents. Crewmembers must not:

- Use copyrighted, trademarked, patented, or unlicensed documents and materials (such as reports, software, photos, logos, slogans, music, or videos) without specific permission from the owner.
- Bring confidential information or data from prior employers to JetBlue.
- Assume online media is free for use. For example, image search results are often copyrighted. Crewmembers should contact [JetBlue's Legal Department](#) with any questions or concerns.

JetBlue generally owns all rights to any intellectual property created, updated, and maintained by our Crewmembers during the terms of our employment.

WHAT SHOULD I DO?

I received an email from my friend Rob who works for a competitor of JetBlue. Rob's email contains confidential information about his company's promotional strategies that could be useful to JetBlue's marketing planning process. I know this was a mistake on Rob's part, but I figured that since I now have seen the information, I can use it. What should I do?

Crewmembers should use our five Values to guide their actions — which includes acting with Integrity. This means not only do we do things right, but we do the right thing.

It's clear that Rob disclosed this information accidentally and therefore you shouldn't use it. If ever in doubt, seek guidance from JetBlue's [Ethics & Compliance team](#).

Confidential & Proprietary Information

SAFETY • CARING • **INTEGRITY** • PASSION • FUN

As a result of our work with or for JetBlue, we may become aware of non-public information about JetBlue, our fellow Crewmembers, and our Business Partners. It is critical that we are cautious and discreet when using all information that may potentially be considered as classified, confidential, or sensitive. If disclosed, this information could harm JetBlue, aid our competitors, or place us at a competitive disadvantage in the marketplace. Because of this possibility, we should not use information obtained during our employment for any reason unrelated to JetBlue.



Proprietary information: info or data that belongs to JetBlue

Examples of such information may include, but are not limited to:

- Business strategies and plans;
- Potential acquisitions;
- Internal surveys;
- Unpublished financial and statistical information (both current and forecasted), and;
- Information about current or prospective Business Partners.

Each of us has a duty to keep proprietary information strictly confidential and protected from disclosure. If we think proprietary data has been inadvertently disclosed, please inform JetBlue's [Ethics & Compliance team](#).

Trust in our business is important and we take privacy seriously. At JetBlue, we respect our Customer's privacy and are committed to protecting personal data.

The regulatory landscape is evolving and JetBlue is committed to ensuring compliance with all applicable privacy laws and regulations.


WHAT SHOULD I DO?

My cousin has started selling personal care products with a multi-level-marketing company. He wants to expand his business and asked you to provide the email addresses and Instagram usernames of as many coworkers as possible. What should I do?

JetBlue's Crewmember, Business Partner and Customer information is confidential, and should not be shared with anyone — not even a close family member.

A Customer emailed me asking for help erasing their data. They said they live in Europe and are making a GDPR request. What does this mean and what should I do?

We want to make sure we're handling these types of requests correctly. Before responding to the Customer, consult our Privacy Policy and connect with the [JetBlue Legal Team](#).

 Our Privacy Policy describes our privacy and security practices in greater detail. Please review the policy on [JetBlue.com](https://www.jetblue.com/privacy)

JetBlue does business in the United States and around the globe. We are subject to the laws, rules, and regulations of the U.S. and those of the countries where we operate. JetBlue strives to comply with all applicable laws, rules and regulations respects their intent and principles upon which they are based. Laws are sometimes complicated, but confusion or ignorance is not an excuse for non-compliance. Crewmembers should bring questions about any such laws, rules or regulations, to JetBlue's [Ethics & Compliance team](#).

Financial Integrity Policies: JetBlue has policies to help Crewmembers understand certain standards for sourcing goods or services; executing contracts, purchases, and payments; and providing items of value.

Our [Business Case](#), [Sourcing & Purchasing](#), [Signature Authorization](#), [Contract Review](#), and [Software Management](#) policies protect our assets and provide the appropriate controls needed for us to work effectively with our Business Partners while avoiding any real or apparent conflict of interest.

Crewmembers must follow [JetBlue's Travel & Expense](#) policy for incurring business related expenses and reimbursement requests.



Did you know?

JetBlue has a [Corporate Policies page](#) on HelloJetBlue to make finding the right policy easy!

What is an example of a kickback?

JetBlue provides discounts to certain Customers. However, if a Customer gets an inappropriate discount, and a Crewmember gets a payment in return, this is a kickback.

WHAT SHOULD I DO?

I recently completed an accounting entry for a Crewmember and have several questions regarding how the deal was done. My Crewleader could not answer my questions, but she told me it was all “on the up and up” and that I should just plug in the numbers. What should I do?

It's our responsibility to act with Integrity in everything we do, including understanding every transaction we enter. If you still have questions about the transaction, you should ask a higher level leader or use the [Business Integrity Hotline](#).

Compliance With Policies

SAFETY • CARING • INTEGRITY • PASSION • FUN

Information Technology (IT) Policies: JetBlue has policies to protect our electronic assets including: data classification and protection, password protection, remote access controls, and the appropriate use of computing devices and networks. JetBlue has the right to require security controls on all electronic and computing devices used to conduct JetBlue business or interact with internal networks and business systems, whether owned or leased by JetBlue, the Crewmember, or a third party.

Violation of JetBlue's [IT Policies](#) may be grounds for disciplinary action including eGuidance and/or separation of employment, where appropriate and permitted by law.

Document Retention: JetBlue is committed to appropriately maintaining complete and accurate records (both hard copy and electronic) consistent with all applicable laws, regulations, requirements and best practices. Our Document Retention Policy is designed to establish systematic procedures for maintaining JetBlue records, documents, emails and other electronic media and, when appropriate, destroying them in an orderly fashion. The policy is intended to manage the costs related to recordkeeping and ensure records which may be required for future reference, or that are required to be retained by law, are retained appropriately and stored economically. The Document Retention Policy also ensures records, email, and other documents are properly destroyed.

WHAT SHOULD I DO?

A friend at another airline has asked to swap passwords so we can check flight loads. Am I doing anything wrong?

Yes. Our corporate websites contain valuable information we must protect. Never give your password(s) out to anyone. Sharing a password – even to myIDTravel can compromise the security of our network & information.

Compliance With Policies

SAFETY • CARING • **INTEGRITY** • PASSION • FUN

Investigations & Inquiries: JetBlue cooperates fully with government inquiries and requests for information. We do not prevent persons affiliated with us from speaking with government officials. Crewmembers should contact their Crewleader and the [Legal Department](#) before doing so.

When we receive a request for documents or a subpoena, we refer it to our [Legal Department](#), who will coordinate our response and ensure that it is appropriate and complete. We never destroy, alter or change JetBlue records requested by— or related to—a government investigation.

When we receive notice of an investigation or lawsuit, a request for documents, or a subpoena, we preserve all related records and cooperate with the Legal Department in making them ready for evaluation and/or production.

If we are contacted by a government authority (U.S. or otherwise) with regard to a non-routine request for information, we must immediately notify a member of the Legal Department who will determine what information needs to be provided in each case.

Crewmembers with further questions regarding our [Subpoena & Information Request Policy](#), should contact the [Legal Department](#).

WHAT SHOULD I DO?

You receive a phone call at work from an unknown person who claims to be “a Business Partner.” The caller mentions a lawsuit involving JetBlue that you have read about online and begins to ask detailed questions about your work, including items that are not public. What should you do?

Politely request the caller’s name and reason for calling. General requests for information should be directed to the [Corporate Communications team](#).

A “gift” is anything of value you give or receive. Gifts can include: meals and beverages; tickets to entertainment or sporting events; goods or services; use of a residence or vacation home; travel or lodging expenses; discounts; or charitable or political contributions made on someone’s behalf. If the recipient does not pay the normal cost of something, it probably will be considered a gift. If something is available to the public on the same terms that it is being offered to the recipient, it generally will not be considered a gift.

Business Gifts

From time to time, some Crewmembers may receive customary acts of hospitality (including meals or entertainment) from current or potential JetBlue Business Partners or from other business associates. We should use good judgment in accepting such customary, token gifts or favors. It is inappropriate to give or accept business gifts or favors that go beyond customary hospitality in size, cost, frequency or nature. No gift should ever be accepted if the gift would influence, or appear to influence, a business decision.

JetBlue’s policy prohibits Crewmembers from accepting or offering gifts or items of value (including meals and entertainment) to any government employees, elected officials or quasi-governmental authority employees unless it is clear that such gift:


- Does not violate any applicable laws or regulations; and
- Is not offered with the intent to improperly influence the recipient.

WHAT SHOULD I DO?

What are some examples of gifts or entertainment that are never acceptable?

Some examples of unacceptable gifts are:

- Those that would be considered illegal, or violate laws or regulations.
- Anything offered to a government official in breach of bribery laws.
- Gifts that are offensive, sexually oriented, unwelcomed, or those which do not comply with JetBlue’s harassment, discrimination, and equality policies.
- Gifts, or an exchange thereof, which could be construed as a bribe.

 **Need to know if a gift is permissible?**
Refer to JetBlue’s [Gift Policy](#) or consult the [Ethics & Compliance](#) team before offering or accepting a gift.



Our Community & Public

Section 1: Crewmember
Political Activities

Section 2: Media, Analyst, Investor
& Public Inquiries

Section 3: JetBlue in Action

Section 4: Human Rights &
Labor Practices

Crewmember Political Activities

JetBlue values civic engagement, however, JetBlue's name, property, or resources cannot be used to support personal political activities. Crewmember's individual involvement and contributions should never be represented as endorsed by, or on behalf of, JetBlue. Crewmembers will not be reimbursed or provided additional compensation for political contributions.

Corporate Political Activity

In order to protect the economic future of the Company, our Crewmembers, and our Owners, JetBlue participates in the political process to defend against unreasonable, unnecessary, or burdensome legislative, or regulatory actions at all levels of government, and to promote policies that encourage the health of our industry, fair competition, and consumer choice.

While JetBlue generally does not make direct political contributions, we do on occasion find it in the company's best interest to make corporate contributions to individual candidates and party committees in compliance with applicable laws and regulations.

The JetBlue Political Action Committee

The JetBlue Airways Corporation Crewmember Good Government Fund (JetBlue PAC) is a nonpartisan Political Action Committee that provides Crewmembers an opportunity to participate in the political process. Campaign Contributions made by the JetBlue PAC are funded entirely by the voluntary contributions of JetBlue Crewmembers, meaning no corporate funds are used. Participation in the JetBlue PAC has no bearing on a Crewmember's career at the company. For more information about the JetBlue PAC contact the [JetBlue Government Affairs team](#).



Review our Political Contributions Policy on the [JetBlue Investor Relations](#) site.

Media, Analyst, Investigator & Public Inquiries

SAFETY • CARING • INTEGRITY • PASSION • FUN

JetBlue is committed to delivering accurate and reliable information to media, bloggers, financial analysts, investors, and other public forums. All public disclosures, including forecasts, press releases, speeches, and other communications, will be honest, accurate, timely, and representative of the facts. Crewmembers other than those in Corporate Communications and Investor Relations are not authorized to answer questions from the media, bloggers, financial analysts, investors, or other public forums on JetBlue's behalf.

Members of the media, bloggers, or other public inquiries are welcome to contact the 24/7 Corporate Communications Media Hotline at 718-709-3089. Analyst and investor inquiries may be directed to our Investor Relations team at 718-709-2022. This guidance applies to all formal and informal requests for information, whether made in person, over the phone, in writing, or using any form of social media.

WHAT SHOULD I DO?

A reporter from a local news site called me looking for some basic information about our company. Can I answer her questions?

No. Even simple questions must be rerouted to Corporate Communications because we may not have all the relevant facts. Even if a Crewmember provides accurate information, releasing it at the wrong time could interfere with the Company's strategic plans. In addition, uncoordinated disclosure could pose problems with securities laws if the information released was material inside information.

JetBlue for Good

JetBlue's mission is to inspire humanity—both in the air and on the ground. We are committed to giving back in meaningful ways in the communities we serve and to inspire others to do the same. Learn more at [JetBlue.com](https://www.jetblue.com).

Sustainability

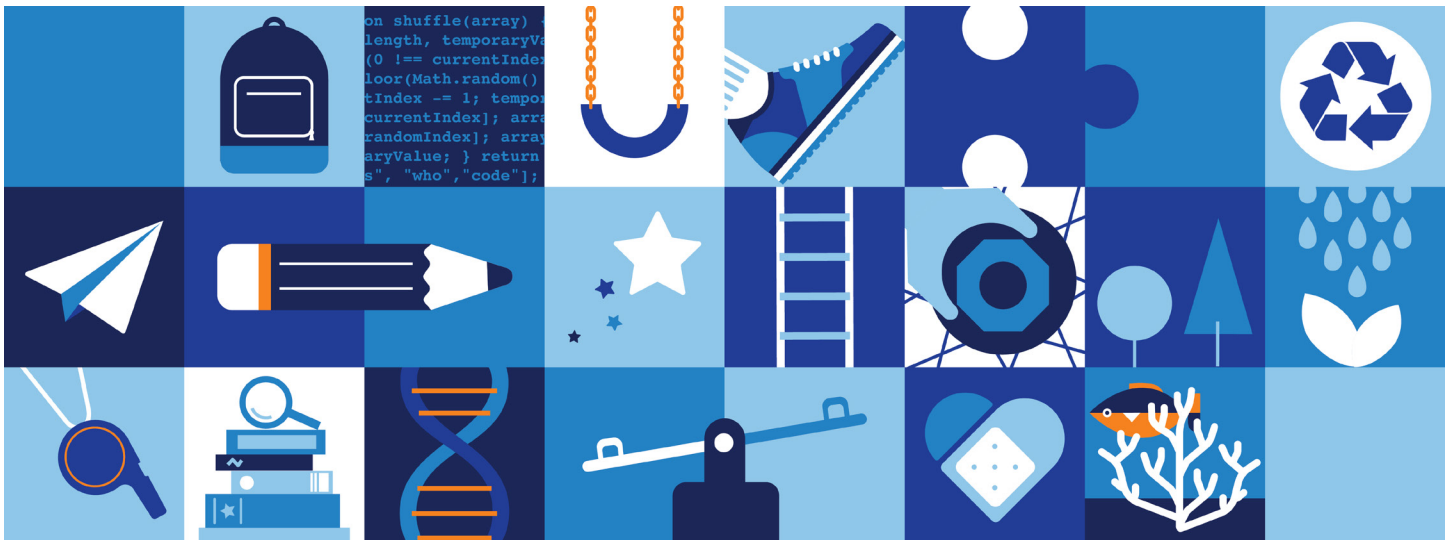
JetBlue depends on natural resources and a healthy environment to keep our business running smoothly. Natural resources are essential for us to operate, and tourism relies on having beautiful, natural, and well-preserved destinations for our Customers to visit.

Our Stakeholders are an integral part of our sustainability strategy. Members of the public and JetBlue Crewmembers are encouraged to learn more about JetBlue's [Sustainability Program](#). Additionally, JetBlue's annual [Environmental Social Governance Report](#) highlights our economic, social, and environmental efforts.

Diversity, Equity & Inclusion

JetBlue's focus on [Diversity, Equity, & Inclusion](#) contributes to our growth and sustainability by embedding the shared and unique identities, backgrounds, and perspectives of our Crewmembers, Customers and Communities into all the ways we do business.

We firmly stand against racism, discrimination, bigotry and hate of any kind and are committed to helping fight injustice, breaking down barriers and reducing biases to help foster more inclusive experiences for our internal and external stakeholders.



Human Rights & Labor Practices

SAFETY • CARING • INTEGRITY • PASSION • FUN

Respecting human rights means treating people with dignity. JetBlue recognizes its responsibility to respect internationally recognized human rights and labor standards, including the Universal Declaration of Human Rights and the International Labor Organization's Core Conventions.

HUMAN TRAFFICKING

As one of the first airlines to sign on to the United States Department of Homeland Security (DHS) and Department of Transportation's (DOT) Blue Lightning Initiative, JetBlue is committed to the efforts undertaken by government and law enforcement agencies in identifying and reporting human trafficking. Pursuant to our mission to Inspire Humanity, we continue to engage and train our Crewmembers on this critical matter.

CHILD LABOR

JetBlue and its Business Partners shall adhere to the minimum employment age limit defined by national laws and regulations, and comply with relevant International Labor Organization (ILO) standards, and must ensure that hours and tasks performed by these individuals does not hamper their education, health, safety, and mental or physical development. Business Partners shall ensure that no underage labor has been used in the production and/or distribution of their goods.

FREELY CHOSEN EMPLOYMENT

JetBlue and its Business Partners must not engage in or support any form of slavery, forced or compulsory, bonded, prison, indentured labor, or human trafficking of involuntary labor through threat, force, fraudulent claims, or coercion. We fully comply with the requirements of applicable slavery, forced labor, and human trafficking laws, including, but not limited to, the UK Modern Slavery Act.

WAGES AND BENEFITS

JetBlue Crewmembers are paid lawful wages, including overtime, premium pay, equal pay for work, and legally mandated benefits. Compensation is provided in a way that is prompt and easily understood. Conditional payments or disciplinary deductions are not tolerated. In the event of cross-border Crewmember deployment, JetBlue adheres to applicable laws and regulations, including local minimum wages.

WORKING HOURS

Crewmembers working hours may not exceed the maximum set by local law. In addition, a workweek shall not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Crewmembers must be allowed at least one day off every seven-day week. More information on our employment practices can be found in the JetBlue Crewmember Blue Book (CBB).

HEALTH AND SAFETY

JetBlue recognizes the importance of conditions that are healthy and safe for all Crewmembers and provides a working environment that minimizes health and safety risks, supports accident prevention and emergency plans and response procedures, and protects the health and safety of all people who may be affected by their activities. JetBlue complies with health and safety laws and regulations in the geographies in which we operate, and provides Crewmembers with relevant health and safety information. JetBlue's comprehensive safety programs contain detailed strategies for maintaining a safe and healthy workplace.

The high-level objectives of our health and safety program include:

Occupational Safety

JetBlue identifies, assesses, and controls as appropriate any possibility of Crewmember being exposure to potential safety hazards (e.g. chemical, electrical and other energy sources, fire, vehicles, and fall hazards). Where hazards cannot be adequately controlled by these means, JetBlue provides Crewmembers with appropriate and well-maintained protective equipment at no cost, as well as educational materials about risks associated with these hazards to their health and safety. Crewmembers are highly encouraged to raise safety concerns.

JetBlue has numerous additional procedures and systems to prevent, manage, track, and report occupational injury and illness.

Physically Demanding Work

JetBlue identifies, evaluates, and controls any Crewmember exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks.

Machine Safeguarding

JetBlue evaluates safety hazards related to production and other machinery. Physical guards, interlocks, and barriers are provided and properly maintained where machinery presents an injury hazard to Crewmembers.



Our Industry

Section 1: Fair Dealing

Section 2: Antitrust &
Competition Laws

Section 3: Competitive Information

Section 4: Anti-Bribery &
Corruption Laws

Section 5: Trade, Commerce
& Sourcing

Section 6: Government Contracting

Fair Dealing

JetBlue strives to deal fairly, honestly, and in good faith with our fellow Crewmembers, Business Partners, Customers, competitors, regulators, and all others. We believe the best way to outperform our competition is by conducting our business fairly and honestly, by seeking competitive advantages through superior performance, and never through unethical or illegal practices.

JetBlue commits to marketing our products and services in a fair and truthful way.

WHAT SHOULD I DO?

I recently saw a draft of an advertisement for our company that I know to be an exaggeration, and maybe even untrue. What should I do?

Honesty and trust are important to our culture and our Integrity value. Our Customers need to know what we're telling them is truthful and accurate – so good catch!

Start by letting the leader responsible for that advertisement know their information might not be correct. If you're uncomfortable or unable to talk to them directly, notify the [Ethics & Compliance](#) team, or the [Business Integrity Hotline](#).

Antitrust & Competition Laws

SAFETY • CARING • INTEGRITY • PASSION • FUN

Antitrust laws exist to protect fair competition and prohibit unreasonable restraint of trade. Violations of U.S. antitrust laws may be met with severe criminal fines, high damage awards, and even jail terms for individuals.

JetBlue Crewmembers may legitimately contact other airlines, such as at trade association conferences or meetings to discuss interline agreements or common airport facilities. However, even the appearance of an unethical or illegal agreement with a competitor can result in costly investigations, antitrust litigation and government enforcement actions.



Antitrust:
laws or regulations meant to encourage competition and prevent monopolies from forming

We should not discuss prices, fares, rates, capacity, discounts, credit terms, terms of sale, fuel surcharges, allocation of markets, Customers, or routes, competitive bidding processes, Crewmember wages, and similar matters with any competitor. Before attending any event at which competitors may be present, Crewmembers should know our antitrust conduct rules and contact JetBlue's [Legal Department](#) for additional guidance.

Antitrust laws also prohibit unfair "monopolization" of markets. Monopolies are complex subjects, but it's always JetBlue's policy to prohibit unfair practices designed to monopolize any market.

JetBlue expects all Crewmembers and Business Partners to comply with all applicable anti boycott laws.

WHAT SHOULD I DO?

One of my Crewmembers asked me about antitrust and competition laws. What are some examples of actions that violate our policies?

- Fix fares, prices, other terms of sale or commission rates.
e.g.: JetBlue may not agree with another carrier to charge the same fares, travel agent commissions or fees for excess baggage.
- Allocate or divide up customers or markets we serve.
e.g.: JetBlue may not agree that it will serve one city pair in exchange for an agreement that a competitor will serve a different city pair.
- Rig a competitive bidding process.
e.g.: JetBlue may not agree with another carrier on the fares or city pairs that it will include in a Government contract bid.
- Boycott a Business Partner or Customer.
e.g.: JetBlue must not agree with another airline to refuse to deal with a specific travel agent or ground handling company.

Competitive Information

Crewmembers who collect information on competitors and markets are expected to do so legally, ethically, and respectfully. Crewmembers may never use competitive information gathered by espionage, theft, or other unethical means. Sometimes information is obtained accidentally or is provided by unknown sources. In such cases, it's likely unethical to use the information. Although we may lawfully receive competitive information during our work, we have a duty to protect and maintain this information and honor all contractual commitments.

WHAT SHOULD I DO?

A Business Partner provides confidential information about their pricing during the competitive bidding process. A contact from another company asks to see the bid they were given. The document is marked confidential. What is acceptable in this situation?

Decline to share the information and suggest they contact the company directly. Improper sharing of information may appear to resemble collusion or monopolization.

Anti-Bribery & Corruption Laws

SAFETY • CARING • INTEGRITY • PASSION • FUN

Crewmembers and Business Partners must comply with the U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and all other applicable anti-bribery and corruption laws. We may not give, promise or offer anything of value to any Customer, government employee, or any other person to influence a decision, secure an advantage, avoid a disadvantage, or obtain or retain business.

Bribery, corruption, or improper payments of any kind are not tolerated in our business dealings. Such behavior exposes us as individuals and JetBlue as an organization to civil and/or criminal liability. It can also undermine the trust of our Customers, Crewmembers, Owners, and communities.

U.S. bribery laws apply to us regardless of local laws or customs in non-U.S. locations. JetBlue can also be held responsible for FCPA violations committed by a Business Partner. Having knowledge or suspicion that such activity is occurring and deliberately failing to make a reasonable inquiry of wrongdoing (“willful blindness”) is not a defense.



Bribery:
exchanging something of value for an unfair or illegal benefit, often with a government official

Corruption:
when people in power are dishonest or fraudulent, often involves bribery

WHAT SHOULD I DO?

Who is a “foreign government official” according to the U.S. FCPA?

Examples are:

- Officers, employees, or agents of a non-U.S. government, department or agency
- Political parties, party officials and candidates
- Employees of government owned enterprises and organizations



Review JetBlue’s [Anti-Bribery & Corruption Policy](#). Consult with JetBlue’s [Ethics & Compliance team](#) with questions and before providing any gifts or items of value to government officials.

ANTI-MONEY LAUNDERING & TERRORISM FINANCING

JetBlue does not conduct or affiliate business with criminals, terrorists, sanctioned governments, entities and or individuals.

JetBlue is committed to complying with all applicable laws and regulations where we do business.

It is critical that we prevent our organization from being used for illegal activities such as money laundering and illicit dealings. To prevent JetBlue from being used as a conduit for money laundering, terrorist financing or other criminal activity, we comply with all anti-money laundering (AML) laws and regulations in all countries where we conduct business. We also adhere to requirements related to tax evasion under the U.K. Criminal Finances Act and don't tolerate criminal facilitation of tax evasion in our business dealings anywhere in the world.

EXPORT CONTROLS

JetBlue complies with any applicable export controls or regulations.

RESPONSIBLE SOURCING OF MINERALS

Business Partners that supply products that include minerals sourced from conflict-affected and high-risk areas, including but not limited to cobalt, tantalum, tin, tungsten, or gold, must ensure that the sourcing of these minerals does not directly or indirectly finance or benefit armed groups or contribute to serious human rights abuses in Conflict-Affected and High-Risk Areas, as defined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Our Business Partners must exercise due diligence on the source and chain of custody of these minerals.

Government Contracting

JetBlue conducts business with the government and often interacts with government agencies as well as government officials through the course of our work. In every instance, Crewmembers must apply the highest ethical standards and comply with applicable laws and regulations, including certain special requirements associated with government transactions.

All Crewmembers must abide by applicable laws and regulations relating to working with governments, particularly specific requirements associated with government contracts and transactions. When dealing with the government (e.g. submitting bids and proposals and negotiating contracts), Crewmembers must be truthful, accurate, and complete in everything we say, write, and do. All reports, certifications, statements, and proposals must be current, accurate, and complete. All contract requirements must be adequately identified and communicated to the responsible parties. Submission of false, inaccurate, incomplete, or misleading statements can result in civil or criminal penalties for JetBlue as well as the Crewmembers with involvement or knowledge of such practices.

Additionally, in connection with the award, performance, or closeout of a government contract or subcontract, JetBlue requires that we timely disclose in writing to the agency Office of Inspector General (OIG), if we become aware of a principal, Crewmember, agent, or subcontractor who has been involved in:

- Fraud, a conflict of interest, bribery or any violation of gratuity rules
- Any situation involving the government's overpayment on a contract or invoice payment (if overpayment has not been remitted to the government)
- An incorrect or unauthorized charge to the government

JetBlue requires compliance with all of the terms and conditions of our contracts. As a government contractor, we may have additional obligations. Please contact JetBlue's Legal Department with any questions.

Crewmembers are prohibited from offering anything of value to any individual who is involved in evaluating competitive bids with government entities.

Anything of value is not just limited to cash payments. It also includes:

- Free or discount tickets
- Upgrade to Even More Space® or MINT seats
- Shares of company stock
- Lavish personal gifts and entertainment
- Vacations
- Future job offers
- Political contributions
- Waivers on service fees (e.g., baggage and change fees)



Refer to the [Gift Policy](#) or consult JetBlue's [Ethics & Compliance team](#) prior to providing or any questionable gifts, invitations, hospitalities, or other benefits to any kind of government, or foreign official.



THANK YOU

Thank you for taking the time to read this important document. Crewmembers are encouraged to reference the Code of Conduct anytime an unclear situation presents itself.

By being a member of the JetBlue team, we each commitment to operate ethically, follow this Code, and to inspire humanity with integrity.



RELATED POLICIES

Visit the [Corporate Policies](#) page on HelloJetBlue for the most up-to-date listing of our policies.

Section 1: Compliance

Business Integrity Hotline
Code of Ethics
Gift Policy

Section 2: Crewmember

Crewmember Blue Book
Drug & Alcohol Policy
Social Media Policy

Section 3: Company

Contract Review Policy
Document Retention Policy
Insider Trading Policy
IT Policies
P-Card Policy
Privacy Policy
Related Persons Transaction Policy
Signature Authorization Policy
Software Management Policy
Sourcing & Purchasing Policy
Subpoena & Information Request Policy
Travel & Expense Policy

Section 4: Community

Political Contributions Policy
Responsibility Report

Section 5: Industry

Anti-Bribery & Corruption Policy

jetBlue®