

## **JetBlue Airways Corporation Policy on Political Contributions**

JetBlue is subject to extensive regulation at the federal, state and local levels of government and involved in a number of legislative initiatives in a broad spectrum of policy areas that can have an immediate and dramatic effect on our operations. In order to protect the economic future of the company and our shareholders and crewmembers, 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 government policies that will lead to business growth.

### **Political Contributions**

One way to participate effectively in the political process is by making prudent political contributions in compliance with applicable laws and reporting requirements. While JetBlue generally does not make political contributions to candidates, political parties or other political organizations (except through a political action committee funded with voluntary employee contributions that operates pursuant to extensive government regulation), we do on occasion find it to be in the company's best interest to make a corporate political contribution to state and local candidates and party committees. Such contributions must be made in compliance with any and all applicable laws and must be approved by the Senior Vice President of Government Affairs, in consultation with appropriate members of JetBlue senior leadership. The Executive Vice President Corporate Affairs and General Counsel provides periodic updates to the Board of Directors on JetBlue's political activities, including any corporate contributions. JetBlue does not make "independent expenditures" or "electioneering communications," as those terms are defined by applicable law.

Commencing with our 2014 Responsibility Report (which we expect to be available in early 2015), we plan to disclose our itemized corporate political contributions for the preceding year.

JetBlue is a member of industry trade associations and, commencing with our 2013 Responsibility Report (which we expect to be available in the second quarter of 2014), discloses trade association memberships annually where JetBlue pays more than \$25,000 in annual dues. We do not make financial contributions to our trade associations other than in the form of customary dues and charges.

### **Voluntary Political Participation by Employees**

JetBlue values the right and responsibility of our employees to participate in the political process. Such participation is entirely a matter a personal choice. Employees are free to support the political process in a variety of ways, such as through personal contributions or by volunteering their personal time to candidates or organizations of their choice. These activities, however, must not suggest JetBlue's support and must not be conducted on company time or involve the use of any company funds, facilities, equipment or other resources, except as permitted by law and expressly authorized by the General Counsel. In addition, employees may not make or commit to make political contributions on behalf of JetBlue, and JetBlue will never reimburse or otherwise compensate an employee for his or her personal political contributions.

JetBlue provides an opportunity for our employees to voluntarily participate in the political process by joining the company's non-partisan political action committee, the JetBlue Airways Corporation Crewmember Good Government Fund (JetBlue PAC). JetBlue PAC keeps employees aware of important issues and decisions made by government officials that can affect our business, and allows our crewmembers to pool their financial resources to support qualified political candidates, campaigns and political committees to further the interests of the company and our stockholders and employees.

Pursuant to law, the political contributions made by the JetBlue PAC are funded entirely by the voluntary contributions of JetBlue crewmembers (no corporate funds are used), and decisions about participation in JetBlue PAC have no bearing on an employee's career at JetBlue. JetBlue PAC's activities are subject to comprehensive government regulation, including detailed disclosure requirements which involve filing monthly reports with the Federal Election Commission. These reports are publicly available (see <http://www.fec.gov>), and provide an itemization of JetBlue PAC's receipts and disbursements, including its contributions to candidates, party committees and any other organizations.

Requests for JetBlue PAC to make a political contribution must be forwarded to the Vice President of Government Affairs or his designee, who consults with other members of the JetBlue Government Affairs team and an advisory board composed of leaders across JetBlue to determine whether the contribution would advance and protect the interests of the company and our stockholders and employees. JetBlue PAC contributes to the campaigns of qualified candidates who share the company's views on public policy, serve as congressional or legislative leaders, represent geographical areas where JetBlue has a major business presence, or serve on committees with jurisdiction over legislation important to the company. Other contribution considerations include voting records, committee assignments, any prior JetBlue PAC contributions to the candidate, and the financial impact and electoral importance of making a contribution.

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