

JetBlue Airways Corporation Policy on Political Contributions

Purpose

The purpose of this policy is to establish the standards for political engagement by JetBlue, as well as its crewmembers, Board of Directors, and business partners.

Scope

This policy applies to all JetBlue crewmembers and any individual or entity acting for or on behalf of the Company (including our business partners), no matter where in the world such acts occur or services are performed. Nothing herein shall be construed as an agreement to indemnify or assume the liabilities of external third parties.

Statement of Policy

JetBlue is subject to extensive regulation at the federal, state and local levels of government and is 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. This includes direct advocacy, indirect advocacy through participation in trade associations, public communications and media efforts, and making political contributions where appropriate and permitted by law.

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. Consistent with federal campaign finance laws, JetBlue does not make corporate political contributions to federal candidates, political parties, or political committees. However, some state and local jurisdictions permit companies to contribute to state and local candidates, political parties, referenda and ballot initiatives.

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 crewmember 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 state or local political contribution to a candidate. JetBlue may also use corporate funds to make independent expenditures or to contribute to organizations engaged in lobbying or political campaign activity or that make independent expenditures at the state or local level, as permitted by law. If we make any such contributions, we will disclose them on JetBlue's website.

Because the legality of political contributions to state, local or foreign campaigns or causes must be determined on a jurisdiction-by-jurisdiction basis, they must be approved in advance by the Senior Vice President Government Affairs and Associate General Counsel, in consultation with

appropriate members of JetBlue senior leadership. This includes: (a) donations, gifts, or loans of funds, assets or property which are made by crewmembers or third persons, such as agents or consultants, who are reimbursed in any way by the Company; (b) the uncompensated use of Company services, facilities, or property; and (c) loans, loan guarantees or other extensions of credit.

Our political contributions and expenditures are made to further the best interests of the company, our crewmembers, customers and shareholders, and are made without regard to the personal political preferences of individual JetBlue Board members, officers and crewmembers. No political contribution will be given or offered in anticipation or recognition of, or in exchange for, an official act. The Senior Vice President Government Affairs and Associate General Counsel provides periodic updates to the Board of Directors on JetBlue's political activities, including any corporate contributions.

Trade Associations

JetBlue is a member of industry trade associations and discloses trade association memberships annually where JetBlue pays more than \$25,000 in annual dues. We generally do not make financial contributions to our trade associations other than in the form of customary dues and charges. If we find it to be in the company's best interest to do so, we will disclose details on JetBlue's website.

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 of 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 crewmembers 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 Government and Airport Affairs or their 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.

Related Policy

This Policy on Political Contributions should be read in conjunction with the Anti-Bribery & Corruption Policy, and Code of Conduct.

Policy Revisions

This Policy on Political Contributions shall be reviewed and if necessary revised every two years, unless otherwise required by a change in law.

Questions?

Questions regarding this policy may be directed to the [JetBlue Government Affairs Team](#)