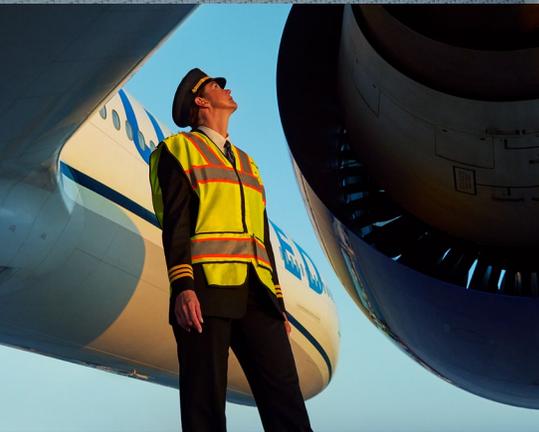


# Code of Ethics and Business Conduct

Connecting integrity to everything we do

Updated July 2023



**UNITED**



# Message from our Chief Executive Officer

United team members, as you know, our story is defined by four simple words: “Good Leads the Way.” This means that at the heart of everything we do and say – every decision – is the desire to do the right thing. This includes our commitment to conducting our business ethically, honestly, and legally, each and every day.

Our Code of Ethics and Business Conduct serves as a baseline for our ethics and compliance program and applies to everyone at United – from employees and officers to subsidiaries and members of the United Board of Directors.

It helps all of us make the right decisions when it comes to sustainable business practices that are good for our customers, each other, and our planet. Please join me in doing your part by taking a moment to review our Code of Ethics and Business Conduct.

Remember that we are in this together. If you have questions, concerns or need to report a possible violation, there are a number of resources available to you including your manager, division leadership and Human Resources partners and the Ethics and Compliance Helpline.

You can be confident that every question or report will be treated seriously and confidentially. In addition, retaliation for asking a question, raising a concern, filing a report, or participating in an investigation will not be tolerated, under any circumstances.

By working as one cohesive team to run our business, guided by the core4 standards of Caring, Safety, Dependability and Efficiency, we ensure our airline operates lawfully and ethically, and we create a company we are all proud to work for.

Thank you for all that you do.

A handwritten signature in black ink, appearing to read 'Scott Kirby'. The signature is stylized and cursive.

Scott Kirby  
Chief Executive Officer

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# Connecting integrity to everything we do

Integrity is at the core of everything we do at United. By complying with laws and policies, we are able to deliver a safe, reliable and competitive product that creates a memorable travel experience for our customers. By protecting our assets, we are strengthening our financial performance. By committing to sustainability, we are investing in the future of our planet and our business. By treating each other with compassion, dignity and respect, we are building an inclusive culture that makes employees proud to work at United.

Our Code of Ethics and Business Conduct (“Code”) is an important tool that helps us all make the right decisions to ensure we conduct our business ethically and legally. Our Code is not meant to include a summary of all laws and policies that apply to our business and does not address every situation we may encounter. It is meant to supplement our personal values, professional skills and good judgment.

Our Code applies to all employees and officers of United Airlines Holdings, Inc. and its subsidiaries (“United”), and to the members of the United Board of Directors.

We are committed to working with business partners, vendors, suppliers and third parties who share our commitment to operating with integrity. Therefore, we expect these third parties to act consistently with our Partner and Supplier Guiding Principles.

## Your responsibilities

### Follow our Code

We all have a responsibility to follow our Code every day.

### Lead by example

Leaders, managers and supervisors must ensure their teams understand our Code, lead by example, encourage open and constructive communication, take appropriate corrective action and support our employees.

## Administration of our Code

- Our Code is not a contract of employment
- United may amend or discontinue the policies, programs and guidelines described in our Code at any time, so you are responsible for regularly checking for updates
- If the terms of our Code conflict with applicable laws, the laws will prevail
- If the terms of our Code conflict with benefit plan provisions or collective bargaining agreements, the benefit plan provisions or collective bargaining agreements will prevail
- Anyone who fails to comply with any of the policies, programs or guidelines described in our Code is subject to corrective action up to and including termination of employment

**“Integrity fosters corporate and individual success.”**

## Seek guidance and report concerns

We all have a responsibility to question and report any situation that seems illegal or unethical. You can make a report to the Ethics and Compliance Office through one of the following channels:

### Ethics and Compliance Helpline: 1-800-461-9330

Individuals outside the United States should visit the Ethics and Compliance Hub to find their local number.

Ethics and Compliance Hub: [ethicsandcompliancehub.ual.com](https://ethicsandcompliancehub.ual.com)

Email: [ethics@united.com](mailto:ethics@united.com)

Mail: Ethics and Compliance Office

233 S. Wacker Drive, Chicago, IL 60606

The Helpline is confidential and available 24/7 with multi-language capabilities. You can choose to use the Helpline anonymously in most locations. Please note that if you choose to remain anonymous, it is important that you provide sufficient detail so we can address your concern.

## What happens when I make a report to the Ethics and Compliance Office?

### Ethics and Compliance Office (ECO) report oversight

1

Individual files report

2

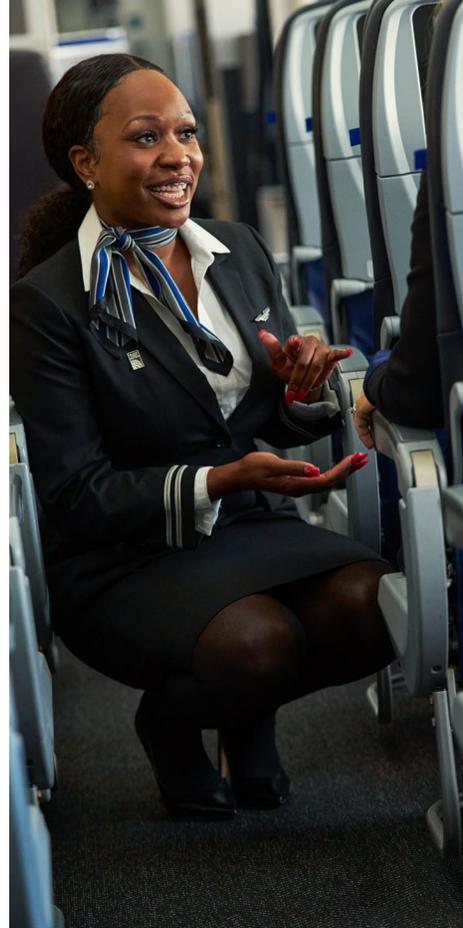
ECO reviews report to determine investigation protocol

3

ECO may investigate or assign other groups such as Employee Relations or Corporate Security, to investigate report

4

Investigator communicates with reporter and completes investigation



## Retaliation

United prohibits retaliation against anyone who files a report about illegal or unethical behavior or participates in an investigation. Anyone involved in carrying out retaliation will be subject to corrective action up to and including termination.



# Making ethical decisions

## Conflicts of interest

A conflict of interest is any situation or activity that involves or appears to involve a conflict between your personal or financial interests and United's interests.

A conflict of interest may interfere with your obligation to perform your work or duties objectively and effectively for the best interest of United. You should be mindful of situations or activities that might result in a conflict of interest and take appropriate action to address the circumstances giving rise to the conflict, including disclosing any situations or activities that might be perceived as a conflict of interest by completing a disclosure form available through the [Ethics and Compliance Hub](#). If you are unsure whether a conflict of interest may exist, you should consult the Ethics and Compliance Office.

## Personal relationships

United does not prohibit more than one family member or friend from being employed by United, nor does United prohibit close personal relationships between employees or between employees and contractors. However, there are situations in which employment of family members, friends or people in close personal relationships could create a conflict of interest. You cannot allow any relationship with another employee or contractor to influence your judgment in work-related matters, including, but not limited to, hiring, job assignments, performance evaluations, compensation, corrective action or determining whether to engage, continue or discontinue work with a contractor.

If you are in a management-level role, you may not manage (directly or indirectly) a family member or someone with whom you have a close personal relationship. In addition, regardless of your role, you may not have a family member or someone with whom you have a close personal relationship anywhere within your span of control, influence or responsibility. You are expected to disclose any such relationship to your Human Resources partner.

## Examples of possible conflict of interest situations:

- When you have a relationship with a co-worker
- When a customer is a family member or friend
- When you are providing travel services to co-workers or repeat customers
- When a service provider/supplier is owned or operated by or employs a co-worker or a co-worker's family member or friend
- When you have a financial relationship with or a management position with a competitor or customer
- When you serve on a board or hold a public office
- When you have outside employment

**"We are all required to be fair, honest and ethical when making decisions that impact United."**

## Preferential treatment based on relationships

You must avoid providing preferential treatment such as unauthorized deviation from established rules for pricing, issuance, exchange or refunding of tickets, waiving of travel restrictions or other terms applicable to discount fares, inappropriate upgrades, improperly withholding seats from inventory or blocking space and ignoring boarding priorities.

Should there be a valid business reason for deviating from established rules, you must receive prior written approval from your supervisor or manager. You may not manipulate a United system to improperly benefit yourself, family members, friends, co-workers or repeat customers. If anyone requests that you deviate from established rules or manipulate a United system in connection with their family member, friend, co-worker or repeat customer, you should notify the Ethics and Compliance Office.

## Companies that are owned by or who employ co-workers or their family members or friends

A conflict of interest may arise when United decisions involve a company that is owned by a co-worker or a co-worker's family member, friend or someone with whom they have a close personal relationship. Generally, it is United's policy not to conduct business with any company in which an employee or an employee's family member or individual with whom an employee has a close personal relationship has a substantial financial relationship. Should there be a valid business reason for deviating from this policy, you must request approval from the Ethics and Compliance Office by completing a disclosure form available through the [Ethics and Compliance Hub](#).

Depending upon the situation, a conflict of interest may also arise when United decisions involve a company that employs a co-worker or a co-worker's family member, friend or someone with whom they have a close personal relationship.

## Financial relationships with competitors, customers or suppliers

You may not knowingly maintain a substantial financial relationship or a management or advisory position with a competitor, customer or supplier if such relationship could be perceived as a conflict of interest. Further, if, as part of your duties at United, you exercise discretionary authority in dealing with a competitor, customer or supplier, you may not have a financial interest in that competitor, customer or supplier. Should there be a valid business reason for deviating from this policy, you must request approval from the Ethics and Compliance Office by completing a disclosure form available through the [Ethics and Compliance Hub](#).

These restrictions do not apply to investments in publicly traded mutual funds, index funds (including airline index funds) or any similar pooling of securities where an individual investor has no say in which companies are included in the fund.

## Question

My spouse and I are on the same team. I am contemplating applying for the team lead position. Can I do so?

## Answer

Even if you are not in a management-level role, you cannot have a family member anywhere within your span of control, influence or responsibility. If your role as a team lead would involve determining things like job assignments or schedules, you cannot be the lead for your spouse.

**For purposes of the Code, the following definitions apply:**

**Family members** include spouse, children, parents, siblings, in-laws and qualified domestic partners. A relationship with an individual who does not meet the definition of a family member may nonetheless be considered a close personal relationship.

**Close personal relationships** include, but are not limited to, significant other or partner, individuals you are dating, business partners, roommates, close friends or others with whom one has a close personal friendship or relationship.

**Substantial financial relationship** is an investment that exceeds (i) ownership of more than 1% of a company or (ii) 25% of one's gross income.

**Competitors** include air carriers, travel agents, computer reservation systems or other travel distribution channels and air carrier maintenance repair organizations.

To the extent that you are eligible for pass travel privileges, you should carefully review the Pass Travel Guidelines. Among other things, these policies prohibit selling, bartering or providing these privileges for personal gain.



## Making ethical decisions (continued)

Officers and members of the United Board of Directors are subject to additional guidelines regarding the ownership of securities of certain companies as described in the United Securities Trading Policy on [Flying Together](#). In addition, certain individuals may be subject to additional guidelines regarding the ownership of securities of certain companies as advised by Legal.

Prior to making a decision that could appear to be a conflict of interest, you must inform your manager and consult the Ethics and Compliance Office.

### Board memberships and public offices

Whether you need to seek approval for a board membership depends on the type of board and your role with United, as noted below. Where required, prior to accepting a board position (director, officer, trustee, equivalent executive position, etc.), you must request approval by completing a disclosure form available through the [Ethics and Compliance Hub](#).

Type of board	Approval required
Board of a for-profit business at the direction or request of, or as part of your regular duties with, United	Division senior officer and Ethics and Compliance Office
Board of a non-profit organization at the direction or request of, or as part of your regular duties with United	Global Community Engagement
Board of a for-profit business in your individual capacity	Ethics and Compliance Office
Board of a non-profit organization in your individual capacity	No approval is required, unless you have a Director-level or above role, in which Global Community Engagement approval is required

In all circumstances, if you serve on a board, you must ensure that your board work or decisions do not create a conflict of interest with United or the airline industry.

Prior to running for or accepting a public office, public position or political appointment, you must request approval from the Ethics and Compliance Office by completing a disclosure form available through the [Ethics and Compliance Hub](#). If you hold a public office, generally you may not act on any matter which may impact United or the airline industry.

## Donations to charities and other non-profit organizations

United believes in being a good corporate citizen, giving back to communities and giving to organizations that share our values. United will focus its direct charitable donations on Internal Revenue Code (“IRC”) Section 501(c)(3) charities, and may also make contributions to other types of non-profit organizations exempt under IRC Section 501(c), like social welfare organizations (501(c)(4)) and trade associations (501(c)(6)).

Before you make a commitment to donate cash or in-kind goods/services to a charity or non-profit organization on behalf of United, you must ensure your department has budget for the donation, obtain approval from the vice president of your department and request approval from Global Community Engagement by completing a disclosure form available through the [Ethics and Compliance Hub](#). In-kind goods/services are non-cash items that include, but are not limited to, airline tickets or certificates, fee waivers/upgrades, United Club memberships/day passes, baggage fee waivers, and the use of corporate facilities or personnel.

Donations should never be intended to influence a government action or decision. If a donation is associated with a government or a government entity, extra review is required to make sure the donation is consistent with United policy and applicable law. If a donation is solicited by a government official, or by a current or perspective United customer, you must indicate that on your approval request.

## Donations to government entities

United is sometimes asked to support government activities like an Embassy 4th of July party or an airport holiday celebration. Before committing to donate to any government-related program, request approval from the Ethics and Compliance Office by completing a disclosure form available through the [Ethics and Compliance Hub](#). See Political contributions (page 17) and Lobbying (page 18) for contributions to a political party, committee, candidate or other political organization.

## Benefitting from your position

You cannot use your employment with United to benefit personally. This includes opportunities for financial gain (for example, participation in an initial public offering under a directed share program or part of a family and friends offering) if the opportunity arises or is offered because of your position with United or from any business relationship as a result of your employment with United.

You cannot solicit or accept fees, commissions, tips or any other type of personal compensation or rebates or rewards from suppliers, customers or anyone else simply for performing your job responsibilities.



## Question

As part of my responsibilities, a United vendor gave me a tablet to test new software. Now that the test is over, the vendor doesn't want the tablet back. Can I keep it?

## Answer

Because the tablet was provided as part of your job responsibilities, you may not keep it for yourself. The tablet should become United property, and you should contact your manager or the Ethics and Compliance Office for guidance about what you should do with it.



## Making ethical decisions (continued)

### Outside employment

As a general rule, employees may work for other organizations while employed at United. However:

- Prior to accepting another job, you should inform your manager (managers should consult the Ethics and Compliance Office if there is any uncertainty about a conflict of interest)
- If the outside employment is related to the airline industry (including, without limitation, as a consultant or expert or with a competitor or a company that provides goods/services to United or other airlines) or a government entity, prior to accepting the job, you must request approval from your manager and the Ethics and Compliance Office by completing a disclosure form available through the [Ethics and Compliance Hub](#)
- Outside employment may not interfere or conflict with your United job responsibilities (for example, scheduled hours, overtime when required, performance of United assignments)
- You may not use United confidential information or resources (for example, supplies, facilities or computer systems including, but not limited to, United email and internet) in connection with the outside employment
- Generally, it is a conflict of interest for an employee in a management-level role to work for a competitor
- Generally, it is a conflict of interest for an employee to work for a competitor in a management-level role
- Any approval for outside employment is subject to periodic review and is not a guarantee of continued approval

### Fundraising

United is committed to supporting community and non-profit organizations. If you conduct fundraising on behalf of United or on United property, you must ensure that the fundraising is conducted fairly and in compliance with applicable laws and you must coordinate with Global Community Engagement. You must refrain from solicitation of employees in the workplace. More information regarding fundraising and solicitation is contained in our Working Together Guidelines.

**"Outside employment may not interfere or conflict with your United job responsibilities."**

### Question

I am a part-time customer service representative. Can I accept a part-time CSR position at another airline?

### Answer

Prior to accepting the job, you must request approval from your manager and the Ethics and Compliance Office by completing a disclosure form available through the [Ethics and Compliance Hub](#).

# "Business gifts and entertainment can build goodwill, but they must not impact objectivity or influence judgment."

## Gambling and raffles

Applicable laws prohibit most forms of gambling. Gambling is an onsite or online activity where money or something of value is wagered on an event (for example, sports betting pools). United prohibits gambling on United property, through United information systems or at United events.

Generally, only certain properly licensed non-profit organizations are legally permitted to conduct raffles. A raffle is a form of a lottery where money or something of value is exchanged for a chance to win cash or prizes through a drawing. When cash is involved such as a 50/50 raffle, the raffle is generally considered gambling. United prohibits raffles on United property or at United events, except for those sponsored and run by properly licensed non-profit organizations that have been approved by Global Community Engagement.

## Business gifts and entertainment

The giving or receiving of gifts and entertainment to or from our suppliers, customers or other persons doing business with United — especially if not managed properly or conducted reasonably — can give rise to perceptions regarding our judgment and business integrity, and can potentially impact our brand and reputation. If anyone improperly offers a gift or entertainment to you, you must refuse and notify the Ethics and Compliance Office.

The following general rules for business gifts and entertainment apply

- Must not be given for an improper purpose
- Must not impact objectivity or influence judgment or give the appearance of a possible impact
- Must comply with applicable laws and regulations
- Must be permitted by the other party's organization
- Must be modest
- Must be infrequent
- Must not be solicited
- Must not be given/received if you are currently, or soon to be, involved in or responsible for negotiations with, or a request for proposal involving, the other party's organization (except for reasonable business meals or refreshments during a business meeting)

## Exercise good judgment

You should consider the following if you are offered a gift or entertainment:

- Could the gift or entertainment influence my objectivity on whether United should do business with the giver/host?
- Does the gift or entertainment serve a business purpose?
- Does the gift or entertainment represent an ordinary and customary business practice?
- How could the gift or entertainment be perceived by others?
- Could the gift or entertainment negatively affect United's reputation?



## Making ethical decisions (continued)

You may infrequently offer or accept gift cards for consumable items, such as restaurant or coffee gift cards, that have a market value no greater than \$25. Gift cards for services like Amazon or other retail establishments are not permitted.

### Additional requirements for business gifts when a government official is not involved

You may offer or accept business gifts, subject to the general rules above and the following reporting or approval thresholds:

- You must consult your manager if you have any uncertainty about whether a gift is appropriate
- You must notify your manager and the Ethics and Compliance Office for a gift with a value of \$50 to \$249 by completing a disclosure form available through the [Ethics and Compliance Hub](#)
- You must request approval from your manager and the Ethics and Compliance Office for a gift with a value of \$250 or more by completing a disclosure form available through the [Ethics and Compliance Hub](#)
- You do not need to report a consumable gift for sharing with co-workers (for example, candy, popcorn or fruit baskets); however, other consumable items such as bottles of wine are subject to the reporting or approval thresholds above
- You do not need to report internal gift-giving between co-workers or for recognition events; however you should be mindful of conflicts of interest and consult the Ethics and Compliance Office if there is any uncertainty as to whether or not the gift creates a conflict of interest.

### Additional requirements for business entertainment when a government official is not involved

You may offer or accept business entertainment invitations (for example, to a meal or event) subject to the general rules above and the following additional requirements:

- The entertainment must be a generally accepted business practice that furthers goodwill
- The entertainment must not be lavish under the circumstances
- The host must be present throughout the entire event; entertainment where the host is not present is considered a gift under our Code

You must consult your manager if you have any uncertainty about whether entertainment is appropriate. However, you do not need to request approval from your manager or the Ethics and Compliance Office for entertainment that complies with the rules and requirements above.

### Additional requirements when a government official is involved or in connection with government relationships

You are required to obtain appropriate approvals prior to making any offers or payments or giving anything of value to government officials. See [Bribery and corruption](#) (page 15) for more information.

## Question

A customer gave me a \$20 gift card in appreciation of my effort to get her rebooked so she didn't miss an important meeting. Can I keep it?

## Answer

No. You should not accept gratuities, including gift cards, for performing your job responsibilities. Politely decline the gift card when it is offered to you.

If you work on United's federal, state or local government contracts, you are subject to substantially different and significantly more onerous rules governing gifts and entertainment. See Interacting or transacting business with the government (page 14) for more information.

### **Cash or cash equivalents**

Offers of cash or cash equivalents such as credit/debit cards, gift cards/vouchers, loans, stocks, stock options and other types of investment securities or similar items are more likely to be viewed as having an improper purpose. We must never accept a bribe or put ourselves in a situation that gives the appearance that we have accepted a bribe. Because of the nature and perception of the offer of cash or cash equivalents, you must not offer or accept cash or cash equivalents.

### **Division or Department policies**

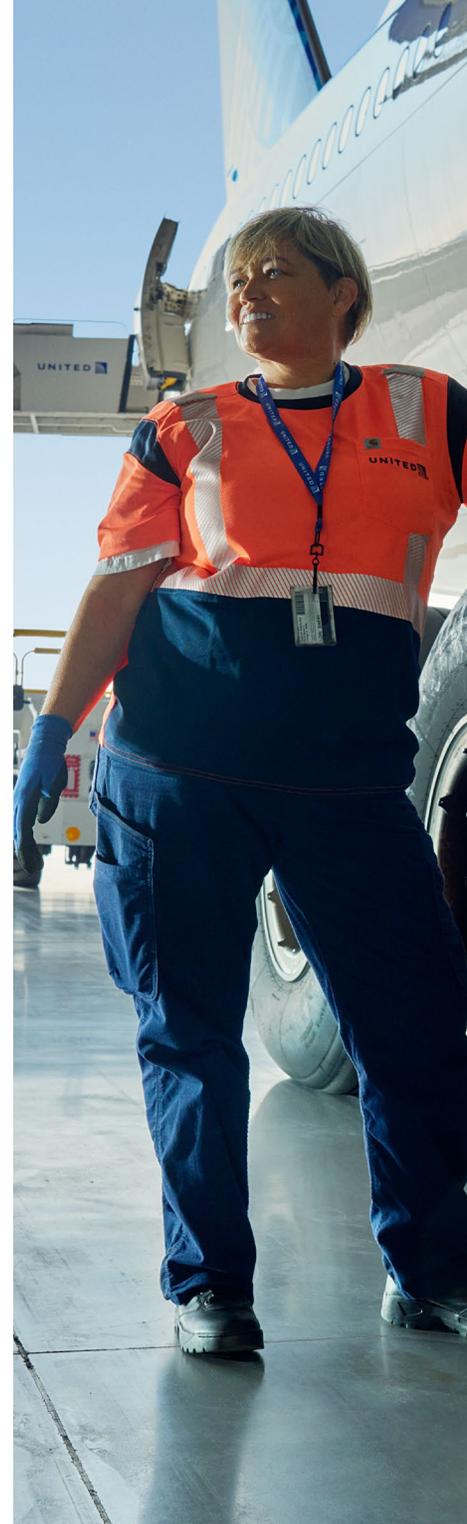
Divisions or Departments within United, particularly those that regularly engage in business gift giving and entertainment, may choose to establish gift and entertainment guidelines that are more restrictive than those described above. You should check whether your Division or Department has adopted any such guidelines before accepting or offering business gifts or entertainment.

### **Doing business fairly and ethically**

Each of us must deal fairly, honestly and ethically with customers, suppliers, competitors, business partners and others with whom we interact. We cannot take unfair advantage of anyone whether through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unethical practice. Our sales and marketing information and promotions must be honest and accurate, and must never be deceptive. Numerous laws exist that could impose severe criminal and civil penalties not only on United, but potentially on employees if we fail to act in a fair, legal and ethical manner.

### **Insider trading**

You are prohibited by United policy and by law from buying or selling United common stock and other securities for any purpose at a time when you are in possession of "material non-public information." This conduct is known as "insider trading." Passing such information on to someone who may buy or sell securities — known as "tipping" — is also illegal. Criminal and civil penalties for insider trading can be severe, and any such conduct is also subject to corrective action up to and including termination of employment.





## Making ethical decisions (continued)

Information is considered “material” if there is a substantial likelihood that a reasonable investor would consider it important in making a decision to buy, sell or hold a security. Examples of material information include financial results or forecasts, adverse changes in liquidity, major new products or services, significant capital expenditures, major contract awards or cancellations, merger or acquisition proposals, significant developments in litigations, and organizational changes, such as layoffs. Information is “non-public” if it has not been made available to the general public (widely disseminated through a manner such as a press release or filing with the Securities and Exchange Commission). In addition, a sufficient period of time must have elapsed after disclosure to allow the information to be fully disseminated to the general public before trading.

If you have any question about whether a particular transaction may constitute insider trading, you should consult the United Securities Trading Policy on [Flying Together](#) and contact Legal.

### Antitrust and other competition laws

United makes independent business decisions that are in its best commercial interests. These decisions must be our own and not result from any coordination, understandings or agreements with competitors, customers, vendors or suppliers that would violate laws designed to preserve competition.

It is United’s policy to comply with all applicable laws and regulations, whether doing business in the United States or abroad. United employees and agents must not enter directly or indirectly into any illegal formal or informal agreements with competitors to fix prices, terms of sale, commission rates or employee wages; to allocate markets, customers or employees; to manipulate a competitive bid; to boycott a supplier, customer or distributor; or to otherwise to eliminate competition.

You must never discuss or share commercially sensitive information such as pricing, capacity, cost data, employment practices, future sales or marketing plans or any other advance or strategic, non-public information with competitors without prior approval from Legal. Before attending any business meeting or other gathering where competitors may be present, make sure that United has approved your attendance, that you have reviewed any agendas and are comfortable that the topics are appropriate and that you understand the rules that govern your conduct and communications — both at formal meetings and informal gatherings. If commercially sensitive information is discussed at such meetings or functions, insist that the discussion ends, leave immediately if the discussion continues and immediately inform Legal.

If you have any questions or concerns about competitive implications of your conduct or any business practice, you must consult Legal before making any decision or taking any action. Please also consult Legal with any questions about antitrust or competition law compliance. Failure to comply with this policy is subject to corrective action up to and including termination.

### Question

I attend a sales meeting with other airlines, and during the sales meeting I am asked what United’s travel agency commission rates are likely to be for next year. Can I share this information?

### Answer

No. This information is competitively sensitive and therefore cannot be shared with our competitors. If you did share this information and other carriers matched our commission rates, your conversation could be viewed or perceived as an attempt to eliminate competition, which could violate antitrust laws.

**“United’s core values and culture embody a commitment to ethical business practices and good corporate citizenship.”**

## **Interacting or transacting business with the government**

As an entity that interacts and transacts business with federal, state and local governments, particularly the U.S. Government, United is required to comply with unique regulatory requirements that apply to government contractors. It is critical that all United employees be aware of the various rules and regulations applicable to United’s government contracts work. If you interact with a governmental entity in any way to perform your work or work directly or indirectly on United’s government contracts, it is your obligation to be aware of, understand and strictly comply with these rules and regulations.

When interacting with a governmental entity or bidding on or performing a government contract, United has an obligation to ensure that the information it provides is truthful, current, accurate and complete.

Resources are available to help you understand your obligations when dealing with a government contract, entity or program. It is also your obligation to seek out the appropriate resources when you have questions or concerns. United’s Federal Government Contracts Policy and United’s Operating Manual for Bidding On and Performing Government Contracts contain helpful information and guidance on the numerous rules governing the interacting and doing business with governments. These documents can be found on the Legal site on [Flying Together](#). If you are involved in United’s state or local government contracts, you should also be familiar with the rules for contributions to a political party, committee or candidate. See Political contributions (page 16) for more information.

All employees have an obligation to report internally any suspected violations of law, policy, procedures, regulations or contract terms or conditions - in other words, any suspected misconduct - related in any way to interactions with a government entity or to bidding or performing a government contract or a subcontract under a prime government contract. United strictly prohibits any form of retaliation against an employee who reports what they believe in good faith is a possible violation.



### **Question**

The Minister of Transportation of a foreign country is a regular passenger on United. Can I upgrade him to First Class?

### **Answer**

No. Unless the Minister of Transportation satisfies the conditions for upgrade as applied to any other customers, you may not upgrade him.

## Making ethical decisions (continued)



### Bribery and corruption

United strictly prohibits bribes. A bribe is when a person, directly or indirectly, offers, promises, gives, requests, agrees to receive or accepts anything of value to induce or influence the improper performance of an activity. This means that you may not:

- Give or receive a bribe
- Do anything in furtherance of a bribe, such as discussing, offering, promising or approving a bribe
- Use a third party to give or receive a bribe or continue using a third party if you have reason to believe that a bribe will or has been made on United's behalf

If anyone, directly or indirectly, improperly requests, solicits or attempts to extort anything of value from you, you must refuse the solicitation, request or extortionate demand and immediately notify Legal or the Ethics and Compliance Office.

It is United's policy to comply with all applicable laws and regulations, regardless of where we are doing business. Under various laws, you or anyone acting on United's behalf must never directly or indirectly offer, promise to make or knowingly allow a payment or anything of value such as money, goods or services (which can include upgrades) to any government official, or to anyone else who you suspect may pass on the payment or thing of value to a government official, in order to:

- Influence an act or business decision
- Gain an improper advantage in our business or operation
- Induce improper performance or illegal activity

The term "government official" includes, but is not limited to:

- An elected or appointed official or any other official of a government entity
- An officer, employee or agent of a government entity
- An appointee, officer, employee or agent of an airport authority
- A candidate for public office
- A close relative of a high government official (for example, "royal family")

The term "government entity" includes any U.S. or non-U.S. federal, state or local legislature, executive branch, agency, or other government agency, Commission, board, authority or any other governmental or quasigovernmental entity; political party; public international organization; or entity owned in whole or in part by or controlled by a government such as a government-owned airline.

The offer or promise itself is enough to trigger a violation. The fact that bribery may be an acceptable local practice does not relieve you from complying with U.S. and non-U.S. anti-bribery laws.

Before offering, promising or knowingly allowing any payments or anything of value to a government official, you must request approval from the Ethics and Compliance Office by completing a disclosure form available through the [Ethics and Compliance Hub](#).

You may not give special treatment to government officials based on their government status. A government official may not receive perks or benefits unless the official satisfies conditions available to other private travelers (for example, Premier Executive status). Before granting special requests for things of value to government officials, you must request approval from the Ethics and Compliance Office by completing a disclosure form available through the [Ethics and Compliance Hub](#). All of us have the responsibility to follow United procedures, including auditing controls, for carrying out and reporting business transactions. If a payment, item or service has been provided which potentially could violate anti-bribery laws, you must immediately contact Legal and the Ethics and Compliance Office.

Additional information can be found in United's Anti-Bribery/Anti-Corruption Compliance Policy on the Ethics and Compliance Office site on [Flying Together](#).

## Political contributions

United believes it has a responsibility to participate in the electoral process and, where appropriate and legally permissible, to make contributions in connection with elections for public office in order to encourage the election of qualified, informed and constructive candidates who decide on government policies important to United. However, these contributions are governed by numerous legal requirements and must be carefully reviewed in advance.

You may not make political contributions on behalf of United, including, but not limited to, monetary or in-kind contributions or the use of corporate resources, email, personnel or facilities without obtaining prior approval from Legal and Government Affairs. Further, you must obtain prior approval from Legal before causing any corporate funds or assets to be used in connection with any volunteer campaign activity, working on volunteer campaign activity during work hours or engaging in the volunteer campaign activity as a representative of United rather than in your personal capacity. This includes using your United job title and/or email or engaging in any other political activity in a manner that could cause someone to believe that your actions reflect the views of United. You must refrain from solicitation of employees in the workplace for political contributions, and you must obtain prior approval from Legal before soliciting any vendor, customer or competitor for political contributions.

Eligible employees may make voluntary contributions to United's Political Action Committee. Certain employees (i.e., Board of Directors, Corporate Officers and any employee involved in the solicitation, response to request for a proposal or administration or management with a state or local government entity) must obtain prior approval from Legal before making certain personal political contributions. More information can be found in United's Political Contribution Policy on the Government Affairs site on [Flying Together](#).



## Making ethical decisions (continued)



### Lobbying

Various laws require individuals engaged in certain activities for the purpose of attempting to influence government decisions (lobbying), and in some cases their employers, to register and file periodic reports. To ensure compliance with these laws, you must obtain prior approval from Legal before engaging in any manner, whether it is yourself or through any outside consultant, in legislative, grassroots, regulatory, or procurement and other official decision-making (including seeking a government contract) lobbying. More information can be found in United's Lobbying Policy on the Government Affairs site on Flying Together.

### Hiring current or former government officials

United has procedures to comply with federal, state and local laws regarding communicating with, interviewing and hiring employees who currently hold or previously held a position with a government entity. Before you have any communications regarding prospective employment with one of these individuals, you must consult with Human Resources. These communications can include casual conversations, emails, resume exchanges and discussion of positions and/or compensation whether initiated by United or the government employee. Government entities may include federal, state and local executive branches, legislatures, agencies, regulators, commissions, boards, public funds and airport authorities.

### International trade and anti-boycott regulations; export controls

Since United conducts business in many international locations, we must comply with laws regarding boycotts, embargoes and economic sanctions against certain countries. United's worldwide operations must comply with the United States export restrictions in addition to applicable export control laws of all countries where we conduct business. Because these laws vary greatly, employees with job responsibilities involving international trade or business activities should consult Legal frequently regarding these matters.

### Human Rights Policy statement

United acknowledges and respects the guiding United States and international principles on human rights. United's Human Rights Policy statement and its Global Policy on Worker Welfare reflect our commitment to conducting our business in a manner consistent with these principles; for example, the principles reflected in the Universal Declaration of Human Rights issued by the General Assembly of the United Nations, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the United Nation's Guiding Principles on Business and Human Rights. United supports and respects internationally proclaimed human rights and condemns all forms of human rights abuses. This Human Rights Policy statement is consistent with our broader commitment to ethical business practices, which are embodied in our Code.

As further discussed in our Working Together Guidelines, United is an equal opportunity employer committed to providing its employees with a non-discriminatory work environment that promotes open and honest communication and embraces dignity, respect and diversity in all aspects of its business operations. United supports the elimination of all forms of forced, bonded or compulsory labor, as well as the freedom of association.

United is committed to addressing modern slavery risks in our operations and supply chains. We strive to have transparent operations and supply chains that are free from such risks. The term "modern slavery" describes situations where coercion, threats or deception are used to exploit victims and undermine their freedom. Modern slavery takes many forms including slavery, servitude, forced labor, people trafficking, the worst forms of child labor, forced marriage, debt bondage, deceptive recruiting for labor or services and harboring victims. Related to this, United condemns all forms of exploitation of children. United does not recruit child labor and supports the elimination of exploitative child labor. United also supports laws duly enacted to prevent and punish the crime of sexual exploitation of children and will cooperate with law enforcement authorities on these matters.

United's Policy for Interacting with the Government and United's Operating Manual for Bidding on and Performing Government Contracts contain additional information about United's strict compliance with specific obligations it undertakes under government contracts to respect human and worker rights.

**"United acknowledges and respects the guiding United States and international principles on human rights."**





# Protecting United information and assets

The integrity of United's assets is crucial to our continued success. We must all take responsibility to safeguard United's physical, financial and intellectual property. An important part of this responsibility is making sure that we use these assets efficiently and only for United-related business purposes.

## Retention and accuracy of United records

A key part of business integrity and efficiency is making sure we abide by our Records and Information Governance Policy in the Employee Services Policy Section of Flying Together, which complies with applicable laws, regulations, accounting principles and business needs regarding record keeping.

We must make certain that our business information is not false or misleading. We must take reasonable efforts to ensure that any reporting or disclosure of United information, whether internally or externally, is accurate, fair, timely and understandable.

## Customer and employee personal information

Our customers and employees trust United to maintain the confidentiality of their personal information including names, addresses, credit card information, Social Security numbers, and passport information. You must ensure that personal information is collected, used, and protected in compliance with applicable laws and United policies, including our Personal Data Privacy Principles, customer and employee Privacy Policies, and our Acceptable Use Policy. Personal information should only be shared as required and with those who have a business need to access such information.

If you should become aware of any suspected unauthorized access to either employee or customer personal information, inform your manager and the Ethics and Compliance Office immediately.

## United confidential information

You must exercise care in handling United confidential information. Confidential information is non-public information that might be helpful to our competitors or harmful to United, our customers and employees if disclosed, such as financial, technical, litigation or contractual information. You must not disclose any United confidential information unless required by law, permitted by contract or otherwise approved by Legal.

### Question

I was contacted by a law enforcement officer who is looking into an airport incident involving one of our customers. Can I give the officer the home contact information for employees who were working on shift when the incident happened?

### Answer

No. Unless there is an immediate threat to safety or security, or we receive a subpoena requiring that we disclose the information, you should not provide the information. All subpoenas or requests for this information should be sent to Legal.

## Intellectual property

Examples of intellectual property include:

- Trademarks such as logos, designs, taglines, slogans, symbols, product names and service names
- Copyrights such as writing, software, music, artwork and audio/visual clips
- Patents
- Trade dress
- Trade secrets
- Rights of publicity such as an individual's right to control use of his/her name or likeness

United's intellectual property is typically the product of the ideas and the hard work of our employees. That property provides great value for our business. There may be legal protections that apply to this property and prompt action may be necessary to protect United's rights. You must promptly notify Legal if you are involved in developing any new technological advances, unique business solutions, or processes, trademarks or written materials such as training manuals or articles that relate to United's business, whether these developments are made while at work or not. Except as provided below, all inventions related to the present or planned business of United which you create or construct while employed by United or within a year after your employment ends, whether or not they were made during your regular working hours, are the sole property of United and are automatically assigned by you to United upon creation. United's ownership does not apply to an invention for which no equipment, supplies, facilities or trade secret information of United was used and which was developed entirely on your own time, unless (a) the invention relates (i) to the business of United, or (ii) to your actual or demonstrably anticipated research or development for United, or (b) the invention results from any work performed by you for United. Legal can provide guidance on the need for filing or signing documents or taking other steps to establish or protect intellectual property rights for United.

You may only use United's intellectual property in connection with authorized United business. In addition, you must make certain that others do not use United's intellectual property without appropriate permission. If you believe that someone else, including another company, is using United's intellectual property without permission, you should let Legal know.

Similarly, you must respect the legitimate intellectual property rights of others. For example, you should not use items such as another's trademarks, software, photographs, videos, music, or excerpts from written articles or an individual's name or likeness unless you have appropriate licenses or approvals. Prior to using another's intellectual property or an individual's name or likeness, you should contact Legal to determine if use is acceptable.





## Information systems and social media

United encourages the effective use of United information systems such as email and the internet for communications related to United business and the performance of regularly assigned duties. You may not use United information systems inconsistent with these purposes. More information regarding social media is contained in our Working Together Guidelines.

## Be safe and reliable

### Laws, regulations and policies

The airline industry is highly regulated by federal, state, local and international governments. You are responsible for knowing and complying with laws and regulations that apply to your position. Without exception, United complies with all applicable laws, rules and regulations. Business demands or pressure from managers, employees or others are no excuse for violating laws or regulations. Remember that even the appearance of misconduct or impropriety can damage United's reputation.

United has many internal policies that exceed the requirements of applicable law. You are responsible for knowing and complying with these policies, including our Code, our Working Together Guidelines, applicable Division work rules and collective bargaining agreements. Failure to comply with applicable policies, laws or regulations is subject to corrective action up to and including termination of employment.

You should contact your manager, Legal or the Ethics and Compliance Office to notify them of any actual or suspected violations, or if you have questions regarding which laws or regulations apply to you.

### Litigation

In addition to complying with laws and regulations, United complies with the judicial process and has legal obligations to hold onto materials that are responsive to a subpoena and threatened or filed civil or criminal matters (Legal Matters). As a result, you must retain any relevant materials regarding the Legal Matter. You must also always be truthful and cooperative when asked for information pertaining to any Legal Matter. In connection with any Legal Matter, you should:

- Treat requests for information as a priority
- Review any questions with the United attorneys handling the matter
- Fully comply with the instructions received from United's internal or outside attorneys
- Contact Legal or the Ethics and Compliance Office to notify them of any suspected non-compliance

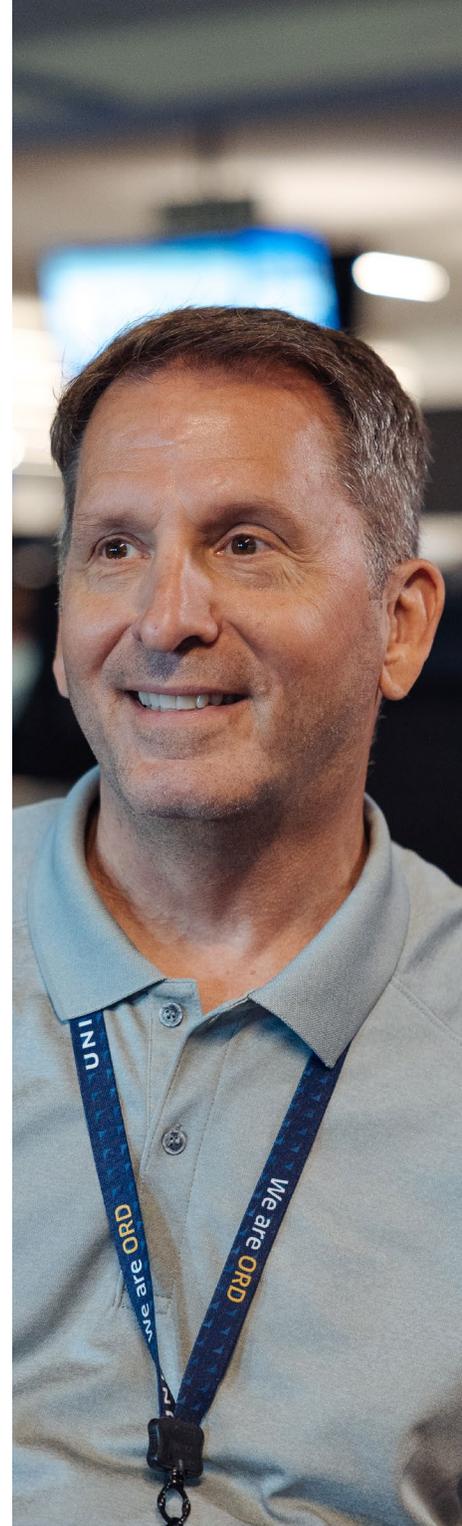
## Employee investigations

When there is a suspicion of inappropriate behavior in the workplace, we must report it so that it can be investigated and addressed. The Department responsible for conducting the investigation will determine what is appropriate. You should not take it upon yourself to engage in activities such as placing a hidden camera or recording device in the workplace or hiring a third party security firm or investigator to observe an employee or conduct an investigation.

## Safety and environmental responsibility

We all have a responsibility to operate our business in a safe and environmentally responsible manner. Complying with all applicable occupational, health, safety and environmental laws, regulations, policies and work rules helps provide a safe work environment for all of us, and a safe, reliable and strong business operation for our customers. You must immediately report any spills or releases of hazardous materials, unsafe or environmentally hazardous conditions, or violations of applicable health, safety and environmental regulations to your manager, Environmental Affairs, Operations Safety or the Ethics and Compliance Office.

**"United is committed to a culture of safety and being an environmentally responsible corporate citizen."**





## Build a great place to work

One of United's greatest assets is our people. The rich diversity of ideas, experiences, cultures and lifestyles represented by United employees around the world makes it possible for us to give the best possible service to our customers.

United provides equal opportunity to all employees and applicants, and we work to achieve a workplace free of discrimination and harassment on the basis of age, citizenship, color, disability, gender, gender identity, genetic information, national origin, pregnancy, race, religion, sexual orientation, veteran status or any other protected characteristic under applicable law. We provide equal employment in, for example, hiring, promotion, transfers, compensation, benefits, leaves of absence and decisions about discipline or termination of employment. We expect our employees to treat co-workers, customers, vendors and anyone else with whom they interact as part of their jobs or at United-sponsored events with dignity and respect.

You are responsible for creating and maintaining a professional atmosphere in which every individual is valued and treated with dignity and respect. Failure to comply with this policy is subject to corrective action up to and including termination of employment.

More information regarding promoting diversity and respect through discrimination and harassment prevention is contained in our Working Together Guidelines.

**"One of United's greatest assets  
is our people."**





