Anti-Slavery and Anti-Human Trafficking Statement for year ending December 2021

United Airlines Holdings, Inc. is a holding company and its wholly owned subsidiary is United Airlines, Inc. (together with its consolidated subsidiaries, "United"). United's shared purpose is "Connecting People. Uniting the World." United, with its corporate headquarters based in Chicago, Illinois, United States, operates the most comprehensive global route network among North American carriers, including U.S. mainland hubs in Chicago, Denver, Houston, Los Angeles, New York/Newark, San Francisco and Washington, D.C.

This statement sets out the steps United has taken, including through the end of its fiscal year ending December 31, 2021, to ensure that slavery and human trafficking are not taking place in its supply chains and in any part of its business.

Commitment

We acknowledge the role that the transportation industry plays in eliminating human trafficking and are committed to addressing modern slavery risks in our operations and supply chains to help put an end to human trafficking. As a global enterprise, we support and respect the guiding U.S. and international principles on human rights, including 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.

We do not recruit child labor and we support the elimination of exploitative child labor. Moreover, United 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.

Accountability Standards

United’s Code of Ethics and Business Conduct ("Code") serves as the cornerstone of United’s ethics and compliance program and is an important tool to help employees make the right decisions to ensure that we conduct our business ethically and legally. United’s commitments to addressing modern slavery risks in our operations and supply chains and not recruiting child labor are set forth in the Code. As stated in the Human Rights Policy Statement included in the Code, United strives to have transparent operations and supply chains that are free from such risks, supports the elimination of all forms of forced, bonded or compulsory labor, condemns all forms of exploitation of children, supports the elimination of exploitative child labor, 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.

All employees receive communications about the Code and are periodically required to acknowledge that they have read and agree to comply with the Code.

United offers a Compliance and Ethics Helpline for employees and third parties to report concerns related to potential violations of, and to ask questions about, the Code. If we learn of any
allegations of slavery or human trafficking through the Helpline, we will promptly investigate and act to remediate the situation in a responsible manner, including coordinating with law enforcement and airport authorities, as appropriate.

Our Code is available on United’s Investor Relations website and is accessible via the following link:

[Code of Ethics and Business Conduct](#)

In addition, as a contractor who provides services to the U.S. Federal Government, United—and any individuals, agents and subcontractors furnishing supplies or services in support of those contracts—is required to comply with specific requirements that prohibit conduct related to forced labor, human trafficking and related acts. 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. We will continue to evaluate our policies and practices on this topic to ensure compliance with applicable laws and our high ethical standards and to meet the expectations of our customers, our shareholders, our communities and other stakeholders. We will communicate our intentions and efforts accordingly.

**Training**

On a worldwide basis, we regularly train our employees with content specific to recognizing possible signs of slavery and human trafficking and mitigating risks. We comply with Title 14 of the U.S. Code of Federal Regulations Parts 121 and 135, which requires operators to provide flight attendants and certain customer service personnel with training regarding recognizing and responding to potential human trafficking victims. All of our in-flight and customer service representatives receive such trainings at least annually. This training equips our frontline employees with the tools and resources to be able to identify potential signs of human trafficking and can then involve the appropriate law enforcement officials for further investigation.

**Supply Chain Compliance**

We have established certain procedures in our procurement processes that are designed to help ensure that our suppliers and subcontractors are also complying with applicable laws and held to the same standard set forth in our Human Rights Policy Statement in the Code and our Global Policy on Worker Welfare. Our contracts require our suppliers and other third parties, among other things, to comply with applicable laws. We have added certain provisions regarding fair labor practices to our supply contracts, including provisions that require our counterparties to provide notice if they become aware of any non-compliance with applicable fair labor laws. We also conduct due diligence with respect to our counterparties and their operations, which can include third party reputation analyses and site checks.
Approved by the Board of Directors on September 22, 2022

Signed and dated by:

Walter Isaacson
Chair of Public Responsibility Committee

Scott Kirby
Board Director and Chief Executive Officer