Code of Ethics and Business Conduct

Connecting integrity to everything we do

Updated August 2020
For questions about this document, contact ethicsandcomplianceoffice@united.com

Message from our Chief Executive Officer

United team members,

Over the last few years, we have taken off on a journey to transform our airline, guided by the core4 standards of Caring, Safety, Dependability and Efficiency. We cannot live up to any of these core values if the choices we make – for our customers, each other and our planet – are not driven by integrity.

At United, our Ethics and Compliance commitment means we do business ethically, honestly and legally, each and every day. Our Code of Ethics and Business Conduct applies to everyone at United and helps all of us make the right decisions to do our jobs with integrity. It is also reflected in our commitment to sustainable business practices that are good for our planet and our bottom line. 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 a team to run our business with integrity, 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.

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 clean, safe, reliable and competitive product that creates a memorable travel experience for our customers. By protecting our assets, we strengthen our financial performance. By committing to sustainability, we are investing in the future of our planet and our business. And 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 to help us 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. ("United") and its subsidiaries and the members of the United Board of Directors.

We are committed to working with third parties who share our commitment to operating with integrity. Therefore, we expect our business partners to act consistently with the principles in our Code.

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.

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 should make a report to the Ethics and Compliance Office through one of the following channels:

**Ethics and Compliance Helpline:**

1-888-700-4244 (within the United States)  
1-847-700-4244 (outside the United States)

Web: ua-ethicsandcompliance.alertline.com  
Email: 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. Information on international toll-free calling options is available on the Ethics and Compliance site on Flying Together.

What happens when I file a report with the Ethics and Compliance Office?

- **Assigned investigator notifies reporter of outcome of investigation**
- **ECO reviews report to determine investigation protocol**
- **ECO may investigate or assign other groups to investigate report**
- **Investigator communicates with reporter and completes investigation**
- **ECO reviews outcome of investigation and closes report**
- **ECO reviews report oversight**
- **ECO may investigate or assign other groups to investigate report**
- **Ethics and Compliance Office (ECO) report oversight**
- **Assigned investigator notifies reporter of outcome of investigation**

Retaliation
United prohibits retaliation against anyone who files a report about illegal or unethical behavior or participates in an investigation. Anyone involved in 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 to your manager, your Human Resources representative or 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 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 or corrective action.

United prohibits managing a family member or someone with whom you have a close personal relationship or having any of these individuals anywhere within your span of control, influence or responsibility. You are expected to disclose any such relationship to your manager or your Human Resources partner.

Preferential treatment based on relationships
You should not allow your or a co-worker’s relationships with family members, friends, co-workers or repeat customers to influence your decisions or actions. 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

We are all required to be fair, honest and ethical when making decisions that impact United.
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 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 or operated by a co-worker or a co-worker’s family member, friend or someone with whom he/she has 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 receive prior written approval from your Division Vice President, the Internal Audit Department and the Ethics and Compliance Office (by completing the “Employee/Related Party Owned Business – Request for Approval” form. (Appendix A)

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 he/she has a close personal relationship. Prior to making a decision about doing business with a company where a potential conflict of interest may exist, you must inform your manager and consult the Ethics and Compliance Office.

**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 such competitor, customer or supplier without the approval of your manager.

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

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.

**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
Officers and members of the United Board of Directors are subject to additional guidelines regarding the ownership of securities of competitors as described in the United Securities Trading Policy on Flying Together.

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**

Prior to accepting a board position, you must obtain approval as described below:

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<th>Type of board</th>
<th>Approval required</th>
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<tr>
<td>Board of a for-profit business at the direction or request of, or as part of your regular duties with United</td>
<td>Division senior officer and Ethics and Compliance Office</td>
</tr>
<tr>
<td>Board of a non-profit organization at the direction or request of, or as part of your regular duties with United</td>
<td>Global Community Engagement</td>
</tr>
<tr>
<td>Board of a for-profit business in your individual capacity</td>
<td>Ethics and Compliance Office</td>
</tr>
<tr>
<td>Board of a non-profit organization in your individual capacity</td>
<td>No approval is required, unless you have a director-level or above role, in which case you must seek approval from Global Community Engagement</td>
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In all circumstances, if you serve on a board, you should ensure that your board work or decisions do not create an actual or potential conflict of interest with United, its business relationships or the airline industry.

Prior to running for or accepting a public office, public position or political appointment, you must consult the Ethics and Compliance Office. If you hold a public office, generally you may not act on any matter which may impact United, the airline industry or your personal interest. If you will be employed by a government entity, generally you must obtain approval as described in **Outside employment** (page 10).

**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 obtain prior approval from the Vice President of your organization and have budget and/or authority to allocate in-kind contributions. 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. After receiving Vice President approval and before making the contribution to the non-profit organization, you must also obtain approval from Global Community Engagement. You can find information regarding the approval process on the Global Community Engagement site on Flying Together.

Donations and contributions to non-profit organizations connected to a government official or requested by, or on behalf of, a government official must be evaluated carefully. Under United’s Anti-Bribery/Anti-Corruption Compliance Policy, you are prohibited from making, or directing or soliciting any other person to provide anything of value for the purpose of influencing or inducing, or that is, otherwise linked to, the obtaining or retaining of business, or influencing a government decision. If the donation or contribution is solicited by a government official or a United customer/prospective customer, you also must obtain approval from Legal regardless of whether it is a business or personal reason. See Political contributions (page 17) and Lobbying (page 18) if the non-profit organization involves a political party, candidate, committee or any other political or governmental 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 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, 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.
Outside employment

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

- Prior to accepting another job or acting as a consultant or technical expert, 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 with a competitor, a company that provides goods/services to United or a government entity, prior to accepting the job, you must obtain approval from your manager and the Ethics and Compliance Office (by completing the “Outside Employment – Request for Approval” form) (Appendix B).
- 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 resources (for example, supplies, facilities, computer systems including, but not limited to, United e-mail 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.

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, consistently and in compliance with applicable laws and United policies. You should exercise care and comply with relevant United policies (such as Global Community Engagement policies regarding Fantasy Flights) in the solicitation of vendors, customers or competitors on behalf of United, and you may not solicit these organization in your individual capacity. You must refrain from solicitation of employees in the workplace. More information regarding fundraising and solicitation is contained in our Working Together Guidelines.

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 seek approval from your manager and the Ethics and Compliance Office by completing the “Outside Employment – Request for Approval” form.
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 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. Certain limited and approved non-profit organizations may hold benefit events on United property 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 approved and properly licensed non-profit organizations.

All such non-profit organizations must be approved by Global Community Engagement and must comply with all applicable laws and United policies.

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. Therefore, 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
- 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?
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 do not need to report a gift with a value less than $50.
- You must report to the Ethics and Compliance Office a gift with a value of $50 to $249 (by completing the online “Report or Request Approval for Gifts” form).
- You must obtain approval from the Ethics and Compliance Office for a gift with a value of $250 or more (by completing the online “Report or Request Approval for Gifts” form).
- 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.

Requirements for business entertainment when a government official is not involved

You may offer or accept business entertainment invitations 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 do not need to report or obtain approval for an entertainment invitation. However, for an out of town entertainment invitation, you should consider whether United should incur the cost of overnight accommodations.

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.

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.

Q&A

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.
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 subject to corrective action up to and including termination of employment.

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. 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.
Making ethical decisions (continued)

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 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. This means that United employees and agents may 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 or customers; to manipulate a competitive bid; to boycott a supplier, customer or distributor; or 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 with competitors without prior approval from Legal. Before attending any business meeting or function where competitors may be present, make sure that United has approved your attendance, that you have reviewed the agenda and are comfortable that the topics are appropriate, and that you understand the rules that govern your conduct and communications. 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 about the event.

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

**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 operates within a complex legal regime that applies to government contractors. It is critical that all United employees are aware of the various rules and regulations implicated by United’s government contracts work, and that we strictly abide by these requirements.

United’s Policy for Interacting with the Government and United’s Operating Manual for Bidding On and Performing Government Contracts contain detailed information and guidance about the numerous rules governing

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**Q&A**

**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 and doing business with governments. These documents can be found on the Legal site on Flying Together.

If you interact with a governmental entity in any way to perform your work or you work directly or indirectly on United’s government contracts, it is your obligation to review, understand and comply strictly with these policies and procedures. Resources are available to answer your questions, help you understand your obligations and to ensure you know how to behave ethically when dealing with a government entity. It is also your obligation to seek out these resources when you have questions or concerns.

All employees have an obligation to report internally any suspected violations of law, policy, procedure, regulations or contract term or condition – in other words, any suspected misconduct – related in any way to interactions with a governmental 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 he or she believes in good faith is a possible violation.

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, regardless of the form of the information or whether the information is expressly identified as a representation or certification, is truthful, current, accurate and complete in all ways. Prior to submitting such information to the government, United employees must strictly follow the policies, guidance and procedures outlined in United’s Policy for Interacting with the Government and United’s Operating Manual for Bidding On and Performing Government Contracts to ensure the accuracy, currency and completeness of the information.

Bribery and corruption

United strictly prohibits bribes. A bribe is where 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

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.
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 with the knowledge that the payment or thing of value will be passed on 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 quasi-governmental entity; political party; public international organization; or entity owned in whole or 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.

You must obtain appropriate prior approval from the Ethics and Compliance Office before offering, promising or knowingly allowing any payments or anything of value to a government official. Information regarding the process to seek this approval can be found on the Ethics and Compliance site on Flying Together.

You may not give special consideration to government officials based on their political status. Consideration may only be provided if 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 receive prior written approval from the Ethics and Compliance Office or Legal.

All of us have responsibility for following 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, 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, 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.
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 reflects 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 is not complicit in 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 are striving 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 harbouring 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.

Additional information regarding United’s commitment to worker welfare can be found in United’s Global Policy on Worker Welfare on the Ethics and Compliance Office site on Flying Together.
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 a United related business purpose.

Accuracy and retention of United records

A key part of business integrity is making sure we abide by our Record Retention Policy, 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 intentionally 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 such as credit card information, Social Security numbers or passport information. You must ensure that personal information is collected, used and protected in compliance with applicable laws, regulations and United policy, including, without limitation, our Personal Data Privacy Principles, customer and employee Privacy Policies and Information Security Policy. You may only use personal information in connection with authorized United business.

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.

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
United’s intellectual property is typically the product of ideas and the hard work of employees.

- 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 ideas and the hard work of employees. You must promptly notify Legal if you are involved in developing any new technological advances, unique business solutions, or processes, trademarks or written material such as training manuals or articles that relate to United’s business, whether these developments are made while at work or not. These developments are United assets that provide 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. Legal can provide guidance on the need for filing 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 networking**

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.

United also recognizes that employees may engage in social networking, provided that you must comply with United policy including, but not limited to, our Code, Information Security Policy, Working Together Guidelines and Media Relations and Communications Policy.
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 applicable laws and regulations that apply to your position. Without exception, United complies with all applicable laws, rules and regulations. Pressure from managers, employees or others, or business demands, 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 is subject to corrective action up to and including termination of employment.

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

Litigation

In addition to complying with laws and regulations, United complies with the judicial process. You must always be truthful and supportive when asked for information pertaining to any litigation or threatened litigation. In connection with litigation, you should:

<table>
<thead>
<tr>
<th>Treat requests for information as a priority</th>
<th>Review any questions with United attorneys handling the matter</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fully comply with the instructions received from United’s internal or outside attorneys</td>
<td>Contact Legal or Ethics and Compliance Office of any suspected non-compliance</td>
</tr>
</tbody>
</table>

For questions about this document, contact ethicsandcomplianceoffice@united.com
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 having responsibility 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.

Clean, safe and environmentally responsible

We all have a responsibility to operate our business in a clean, safe and environmentally responsible manner. Complying with all 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 unclean, unsafe or environmentally hazardous conditions to your manager, Environmental Affairs, Ground 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 absences and decisions about discipline or termination of employment. We expect our employees to treat co-workers, customers, vendors and anyone else with whom employees 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.
<table>
<thead>
<tr>
<th>Date</th>
<th>Section</th>
<th>Summary of revisions</th>
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</thead>
<tbody>
<tr>
<td>2/2012</td>
<td></td>
<td>Ethics and Compliance Principles published</td>
</tr>
<tr>
<td>2/2014</td>
<td>Our commitment to Integrity - It's How We Fly</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Making Ethical Decisions</td>
<td>Updated ECO and Helpline contact information</td>
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<td></td>
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<td>Updated Board memberships and public offices</td>
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<td></td>
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<td>Updated fundraising</td>
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<tr>
<td></td>
<td></td>
<td>Added raffles and gambling</td>
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<tr>
<td></td>
<td></td>
<td>Updated business gifts and entertainment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Updated International bribery and corruption involving Foreign Government officials or employees of Foreign Government Agencies</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Added Human Rights Policy statement</td>
</tr>
<tr>
<td></td>
<td>Protecting Company Information and Our Assets</td>
<td></td>
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<tr>
<td></td>
<td>Be Safe and Reliable</td>
<td>Updated customer and employee data privacy</td>
</tr>
<tr>
<td></td>
<td>Build a Great Place to Work</td>
<td></td>
</tr>
<tr>
<td>12/2014</td>
<td>Appendix A</td>
<td>Added business contact/Accounts Payable information</td>
</tr>
<tr>
<td>9/2015</td>
<td></td>
<td>Updated President and CEO Message</td>
</tr>
<tr>
<td>10/2015</td>
<td>Making Ethical Decisions</td>
<td>Updated Congressional gifts and political contributions</td>
</tr>
<tr>
<td>02/2016</td>
<td>Making Ethical Decisions</td>
<td>Updated When government is the customer</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Updated Human Rights Policy Statement</td>
</tr>
<tr>
<td>03/2016</td>
<td>Making Ethical Decisions</td>
<td>Changed name to Code of Ethics and Business Conduct</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Document redesign</td>
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<tr>
<td></td>
<td></td>
<td>Updated Business gifts and entertainment</td>
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<tr>
<td>06/2017</td>
<td>Making Ethical Decisions</td>
<td>Updated Conflicts of interest</td>
</tr>
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<td></td>
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<td>Updated Interacting or transacting business with the government</td>
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<td>Updated Political contributions</td>
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<td>Updated Lobbying</td>
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<td></td>
<td></td>
<td>Donations to charities and other non-profit organizations</td>
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<td></td>
<td>Protecting Company information and assets</td>
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<td>Hiring current or former government officials</td>
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<td>Updated Intellectual property</td>
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<td>Date</td>
<td>Section</td>
<td>Summary of Revisions</td>
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<td>---------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>08/2020</td>
<td>Connecting integrity to everything we do</td>
<td>Updated CEO Message</td>
</tr>
<tr>
<td></td>
<td>Making Ethical Decisions</td>
<td>Updated application of Code</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Updated Personal relationships</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Updated Preferential treatment based on relationships</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Updated Financial relationships with competitors, customers or suppliers</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Updated definitions</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Updated Board memberships and public offices</td>
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<tr>
<td></td>
<td></td>
<td>Updated Donations to charities and other non-profit organizations</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Added Insider trading</td>
</tr>
<tr>
<td></td>
<td>Protecting United Information and Assets</td>
<td>Updated Human Rights Policy statement</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Updated intellectual property</td>
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</tbody>
</table>
## Appendix A

### Employee/Related Party Owned Business – Request for Approval

It is United's general 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.

<table>
<thead>
<tr>
<th>To</th>
<th>From</th>
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</thead>
<tbody>
<tr>
<td>Division Vice President</td>
<td>Manager</td>
</tr>
</tbody>
</table>

I am requesting approval to contract for goods or services with a business owned by a United co-worker or by his/her family member or by an individual with whom he/she has a close, personal relationship.

<table>
<thead>
<tr>
<th>Business name</th>
<th>Business owner relationship to employee</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>

<table>
<thead>
<tr>
<th>Business street address</th>
<th>Employee/ID number</th>
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</thead>
<tbody>
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<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>City, State/Country, Zip Code</th>
<th>Employee position/location</th>
</tr>
</thead>
<tbody>
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</table>

<table>
<thead>
<tr>
<th>Business phone number and/or email address</th>
<th>Vendor number – Accounts Payable use only</th>
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</table>

Describe in detail the nature of goods or services to be provided:

_____________________________________________________________________________________________________________________________________________________

Estimated amount of business per year $ ___________________________

Describe in detail the business need for contracting with this company:

_____________________________________________________________________________________________________________________________________________________

Do other vendors offer this service?  

☐ Yes  ☐ No

If “Yes,” have you reviewed proposals from these vendors?  

☐ Yes  ☐ No

1. Manager must obtain signature of Division Vice President.

☐ Approved  ☐ Not approved  

__________________________  

Division Vice President  

Date

2. Manager must submit form to Internal Audit Department.

☐ Approved  ☐ Not approved  

__________________________  

Internal Audit Department  

Date

3. Internal Audit Department must submit form to Ethics and Compliance Office.

☐ Approved  ☐ Not approved  

__________________________  

Ethics and Compliance Office  

Date

Approval/Rejection notes – Ethics and Compliance Office use only
Appendix B

Outside Employment – Request for Approval

To
Manager name

From
Employee name

I am requesting approval to accept outside employment.

United employee number

United position

Prospective employer’s business name

Prospective employer’s primary business

Prospective position sought

Prospective position days/hours required

Prospective position job duties (add attachments with detail as necessary)

I acknowledge and understand the outside employment expectations set forth in the Code of Ethics and Business Conduct. I acknowledge that any approval of outside employment is subject to periodic review and is not a guarantee of continued approval, for example, if the outside employer subsequently becomes a competitor of United and/or its business impacts United or if the nature or circumstances of my employment with United or the outside employer change. I agree to disclose any such changes to the Ethics and Compliance Office.

Employee signature

Date

Employee must obtain signature of his/her Manager. Manager signature certifies acknowledgment of outside employment request and review of United and Division guidelines with requesting employee.

Manager signature

□ Approved  □ Not approved

Date

Ethics and Compliance Office signature

□ Approved  □ Not approved

Date

Notes (Ethics and Compliance Office use only)