Alaska Air Group Airport Vendor Code of Labor Standards

OVERVIEW:

Alaska Air Group "AAG" and its employees are committed to observing the highest standards of business ethics. We strive to act with dignity and respect toward others, and to abide by all applicable laws and regulations.

This Airport Vendor Code of Labor Standards supports AAG's Mission and Code of Conduct by clearly stating the expectations we have for our vendors, and the criteria Alaska Airlines and Horizon Air will use to determine which vendors we will continue to engage to grow our business. This Code applies to vendors at airports providing supporting services for operation of passenger air service, such as aircraft cleaning and maintenance, fueling, catering, baggage handling, customer service, wheelchair services, and curbside check-in.

EXPECTATION OF COMPLIANCE:

Any vendor that wishes to do business with Alaska or Horizon shall fully implement and integrate this Code and applicable laws into its business and shall submit to verification and monitoring on request by Alaska or Horizon. Non compliance with this code shall be grounds for terminating the business relationship. To ensure all vendors' employees are aware of their rights as well as the vendors' responsibilities, Vendor shall post this Code in the official language of the country in which it is posted (However vendors are encouraged to translate it to the same languages as other employee policies and notices are translated to.) in places where similar communications to employees are posted. Vendors shall also train their employees on their rights and obligations, and shall ensure that any sub-contractors performing work related to Alaska or Horizon abide by the terms of the Code.

CHILD LABOR:

Vendor does not employ individuals below the age of 16, except if allowed by local law and such exception is consistent with International Labour Organization guidelines. Vendor maintains documentation of each individual's date of birth or has legitimate means of confirming each individual's age.

VOLUNTARY EMPLOYMENT/FORCED LABOR:

Vendor employs all employees on a voluntary basis and does not use any prison, slave, bonded, forced or indentured labor, or engage in any other forms of compulsory labor, or any other form of slavery or human trafficking.

Guidelines:

- Vendor does not require employees to deposit original identification documents, travel documents or any other personal legal documents upon commencing employment with Vendor.
- Vendor ensures that throughout the hiring process and employment period, no deposits (monetary or otherwise) are collected from employees, including temporary, seasonal and migrant labor, and employees provided by agencies, recruiters or brokers.
- Vendor does not confine or subject employees to restrictions on freedom.

ABUSE, HARASSMENT, DISCIPLINARY ACTION:

Vendor does not engage in physical, mental, verbal or any other abuse, inhumane or degrading treatment, or any form of harassment. Vendor treats all employees with respect and dignity and complies with local legislation on disciplinary practices.

Guidelines:

- Vendor maintains a formal written disciplinary procedure and all disciplinary measures must be recorded. The employee affected by disciplinary action acknowledges the action in writing.
- Vendor does not collect monetary fines.
- Vendor conducts security procedures in a gender-appropriate and nonintrusive manner, if applicable.

DISCRIMINATION:

Vendor shall not discriminate against their employees with regard to employment, including hiring, compensation, promotion or discipline, on the basis of gender, race, religion, age, disability, sexual orientation, pregnancy, marital status, nationality, political opinion, trade union affiliation, social or ethnic origin or any other status protected by applicable state or federal law.

FREEDOM OF ASSOCIATION AND COLLECTIVE-BARGAINING RIGHTS:

To the extent required by applicable state and federal laws, including the Railway Labor Act and National Labor Relations Act, Vendor shall respect their employees' freedom of association and their right to engage in collective bargaining. This includes the right to form and join trade unions and other worker organizations of their own choosing without harassment, interference, coercion, or retaliation, and the right to refrain from any or all of such activities.

COMPENSATION AND BENEFITS:

Alaska Air Group Vendor Code of Conduct Rev. July 10, 2013 Page 2 Vendor provides wages and benefits in accordance with all applicable laws.

WORKING HOURS:

Vendor complies with all applicable laws regarding regular working hours, rest periods and overtime hours. Vendor does not mandate overtime to a degree that impairs the health or safety of employees.

SAFE AND HEALTHY WORKPLACE:

Vendor shall provide safe and healthy workplaces and take necessary steps to prevent accidents and injuries that could arise out of, be linked with, or occur in the normal course of the employees' work, or as a result of operation of the Vendor's business. Vendor will have systems in place to detect, avoid and respond to potential risks to the safety and health of all employees. As part of their ongoing responsibility, Vendor shall comply with all local, state, and federal safety and health laws, including all training, information, and reporting requirements.

Vendor shall also provide adequate and clean toilet and hand-washing facilities with basic hygiene amenities. Safe drinking water is to be supplied at all times.

EMPLOYEES' RIGHT TO RAISE CONCERNS:

Vendor employees have the right and are encouraged to immediately report any vendor conduct that could be a violation of this Code. Such complaints may be submitted (anonymously, if desired) in writing, electronically, or verbally to Alaska Airlines Office of Ethics and Compliance or to the Ethics and Compliance Hotline 888-738-1915.