

THE **JETBLUE**  
CODE OF BUSINESS CONDUCT

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# LETTER FROM THE CEO

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## Dear Crewmembers,

At JetBlue, our Values are embedded in our culture and that leads our company. Our long-term success is dependent on our integrity. Every day, our many stakeholders around the world—Customers, Business Partners, shareholders, regulators and Crewmembers—count on our commitment to the highest standards of business ethics and compliance. By living up to our Values and high ethical standards, we ensure that our company will be positioned to flourish for years to come.

Whatever your role at JetBlue, the judgments you make reflect on our reputation and are critical to our success. I am counting on your commitment to embrace and drive a culture in which we continue to grow our business consistent with our Values and, of course, legal requirements, in all markets that we serve.

We all recognize that our heavily regulated industry is always changing, and that in many cases, the rules are complex and strictly enforced. For these reasons, I encourage every Crewmember to ask questions and raise concerns at the time they arise to ensure that we are always comfortable with our conduct. Further, we believe our reputation speaks for itself, and we endeavor to maintain that level of integrity through honest and ethical personal and business practices.

A company either earns the right to keep operating or it doesn't—it's just that simple in the business world. We aim to Inspire Humanity. We believe that mission touches our Customers, our Communities and our Crewmembers. Being successful at that mission truly makes us a different kind of company.

Please take the time to read and understand our Code. It sets forth our core principles that govern all of us. It also identifies the many resources available to help you understand how these principles relate to your job. And lastly, please make sure you are conducting JetBlue's business accordingly. Our sustainability depends on it, and we will be a stronger, more competitive company as a result.

Thank you in advance for your compliance. Your commitment is absolutely critical to our continued success.

Warmest Regards,





# OUR COMPLIANCE PROGRAM

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JetBlue is committed to conducting our business in an honest and ethical manner. Before we operated our first flight, we designated Integrity as one of our five Values.

We believe Integrity is at the foundation of positive, beneficial relationships with each other, our shareholders, our Business Partners, our Customers, and all others with whom we associate.

We act with integrity when we tell the truth, honor our commitments, and accept responsibility for our actions. We also act with integrity when we treat others with fairness, respect, and dignity.

Our mission at JetBlue is to **Inspire Humanity**.



# OUR VALUES

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JetBlue's foundation is built on our Values—Safety, Caring, Integrity, Passion, and Fun. We use our Values to guide our actions, distinguish us from our competitors, and help us deliver superior Customer and Crewmember experiences.

- **Safety** always comes first. We each wear the hat of the Chief Safety Officer. It's everyone's job to ensure a safe environment and experience for our Customers and each other.
- **Caring** is what brings the JetBlue Experience to life. Respect and understanding are the hallmarks of who we are.
- **Integrity** is not only doing things right, but it's doing the right thing. This includes making the right decisions, even when they aren't popular, and to always act in JetBlue's best interest. It's the only way to do business, so we communicate openly and honestly. That's how we earn trust — from each other and our Customers.
- **Passion** is what keeps our customers coming back. JetBlue is more than just an airline. We deliver a great experience and an excellent product with dedication and enthusiasm.
- **Fun** is what gives our workplace a friendly environment. The equation is simple: you enjoy your jobs and our Customers enjoy the JetBlue Experience.



# THE CODE OF BUSINESS CONDUCT

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The Code of Business Conduct outlines the business, personal, and professional standards we, as JetBlue Crewmembers and representatives, must follow. It reinforces JetBlue's Values and is a tool to help us make the right decisions and resolve compliance-related or ethical issues we may encounter.

## **Who Should Follow the Code?**

All Crewmembers, officers, and directors must act according to the principles set forth in our Code. We expect everyone working on our Company's behalf, including consultants, agents, and Business Partners, which includes vendors and suppliers, to adhere to our ethical standards. We may never ask a third party to engage in any activity that violates these standards.

Additionally, all senior financial leaders are expected to abide by the [Code of Ethics](#).

## **Amending and Waiving the Code of Ethics**

Our Board of Directors must approve any amendment or waiver of our [Code of Ethics](#) for senior financial leaders.

## **Accountability & Adherence**

The principles set forth in this Code are general in nature, and are often supplemented by more specific internal policies and procedures. As Crewmembers, we are responsible for knowing and complying with the current laws, regulations, standards, policies, and procedures that govern our work. Further, this Code cannot address every possible workplace situation or list all of JetBlue's corporate policies and procedures. Please use the Code for guidance on our ethical standards and as a resource to understand where questions or concerns may be directed.

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 Training on the Code is available on the [JBU Learning Portal](#) in BCSS.

# BUSINESS ETHICS & COMPLIANCE

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JetBlue's business ethics and compliance program demonstrates our firm commitment to the highest standards of ethics and compliance. Our Code of Business Conduct is the foundation of this program.

The Legal Compliance team within the Legal Department carries out the day-to-day implementation of the business ethics and corporate compliance program which includes:

- The issuance of the company's Code of Business Conduct and corporate compliance policies;
- Development of annual online training on the Code and corporate policies; and
- Administration of the company's hotline.

More broadly, the department reinforces JetBlue's commitment to integrity as a fundamental part of every job within the Company—a commitment that goes well beyond compliance with legal obligations.

## REMEMBER!

There is no justification for an illegal or unethical act. Believing JetBlue benefitted from such an act, or committing such an act because someone else directed us to do so, is no defense.

Knowingly making false accusations of illegal or unethical acts is a serious violation of the Code of Business Conduct. This undermines our reporting process and can damage people's reputations.







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## DUTY TO COMPLY AND REPORT

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# REPORTING OBLIGATIONS

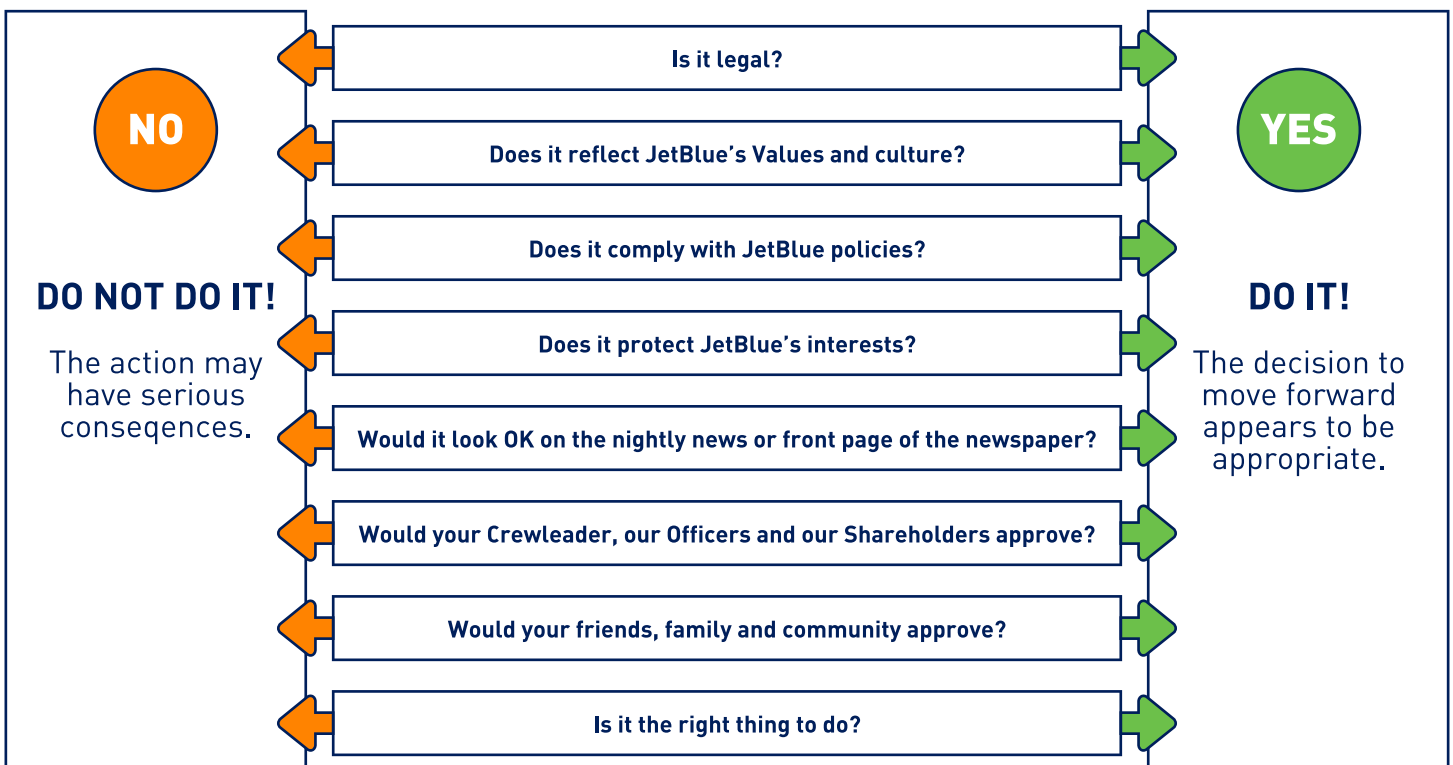
It is the duty of every member of our board of directors, officer, Crewmember, and all other individuals affiliated with JetBlue to comply fully with:

- All applicable laws
- Regulations
- JetBlue policies and procedures
- The Code of Business Conduct

Everyone must offer their complete cooperation with any investigation by JetBlue and/or governing authorities.

We are required to report to the [Legal Compliance team](#) or the [Business Integrity Hotline](#) any actual or suspected violations of the Code, JetBlue's policies, procedures, or any applicable law. We must also report any other compliance-related issues, including but not limited to, conflicts of interest, fraud, or other misconduct of any type relating to JetBlue's operations.

**NOT SURE WHAT TO DO?** We should ask ourselves these questions:



**NOT SURE?** Talk to your Crewleader or contact the Business Ethics and Compliance team for guidance.

# STEPS FOR REPORTING

The resources below may be used to obtain advice regarding business ethics issues, or for general clarification on the principles set forth in this Code and their applicability:

<b>Your Crewleader:</b>	You should begin by consulting the person who best understands your area of responsibility: your supervisor or manager.
<b>JetBlue General Counsel/Legal Department:</b>	The <u>Legal Department</u> can provide guidance with questions concerning laws and acceptable business practices.
<b>JetBlue Business Integrity Hotline:</b>	<p>JetBlue has established a confidential and anonymous <u>Business Integrity Hotline</u> program that is operated by an independent third party, for the reporting, documenting, and routing of concerns related to accounting, internal controls, and auditing matters, or for violations of this Code. Reports will be routed to the appropriate JetBlue leaders for investigation. Any such concerns may be submitted to the hotline 24 hours a day, 7 days a week via:</p> <ul style="list-style-type: none"> <li>• <b>Telephone:</b> 1-866-318-7453 or</li> <li>• <b>Web:</b> <a href="https://jblu.alertline.com">https://jblu.alertline.com</a></li> </ul>
<b>BlueWatch:</b>	<p>All safety and security emergencies or urgent matters including threats and all suspicious activity within the JetBlue Operating System, should be reported to BlueWatch via:</p> <ul style="list-style-type: none"> <li>• <b>Urgent Issues:</b> 1-866-255-2739</li> <li>• <b>General Inquiries:</b> <a href="mailto:BlueWatch@jetblue.com">BlueWatch@jetblue.com</a></li> </ul>
<b>IT:</b>	<a href="mailto:ITSecurityCrew@jetblue.com">ITSecurityCrew@jetblue.com</a>
<b>In Writing:</b>	<p>Alternatively, reports of violations or suspected violations may be submitted confidentially or anonymously in writing to:</p> <p>JetBlue Airways Corporation            27-01 Queens Plaza North            Long Island City, NY 11101            Attn: Business Ethics &amp; Compliance Manager (Confidential)</p>

## IMPORTANT NOTE!

**People Department Matters:** Concerns relating to JetBlue’s Equal Employment Opportunity or Harassment Policies should be directed to a People Department manager.

**Drug and Alcohol Matters:** Any suspicion that a Crewmember is currently under the influence of drugs or alcohol should be reported immediately to a supervisor. If there is a potential Safety concern, BlueWatch should also be contacted.

# INVESTIGATIONS OF VIOLATIONS

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JetBlue will promptly investigate any reported potential violations of our Code of Business Conduct and related policies and procedures. All reports of potential violations will be kept confidential to the fullest extent possible, consistent with the need to conduct an adequate investigation. Crewmembers are expected to cooperate fully in any investigation of an alleged violation.

The Audit Committee of our Board of Directors is responsible for addressing any reports of suspected violations relating to accounting, auditing or other financial matters, in accordance with policies and procedures established by the Committee.

# DISCIPLINE FOR VIOLATIONS

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We should consistently aim to do what is permissible, acceptable, and expected. This means trying to always use good judgment and common sense. Violations of this Code of Business Conduct, or of the policies referred to in this Code, may result in eGuidance up to and including separation of employment, or criminal prosecution where legally permitted and applicable.

Examples of conduct that may result in disciplinary action:

- Authorizing or being involved in actions which violate JetBlue's Code of Business Conduct, policies and procedures.
- Failing or refusing to report a violation of JetBlue's Code of Business Conduct, policies and procedures.
- Refusing to cooperate in an investigation of an alleged violation of JetBlue's Code of Business Conduct, policies and procedures.
- Deliberately making a false accusation with the sole purpose of harming or retaliating against another Crewmember.
- Retaliating against an individual for reporting a violation or possible violation of JetBlue's Code of Business Conduct, policies or procedures.

## WHAT SHOULD I DO?

**What happens if someone deliberately makes a false report in order to get me into trouble?**

All investigations are handled professionally and objectively. Intentionally making a false accusation is a serious violation and may lead to disciplinary action, up to and including separation of employment, where legally permitted and applicable.

**I observed a situation that I suspect violates our Code. Should I report this situation even if I am not completely certain that there is a problem?**

Crewmembers are responsible for immediately reporting possible violations to management or another company resource. Your report will be taken seriously and investigated as appropriate. It is better to report a suspicion that turns out to be a nonissue than to ignore a possible violation of the law or Company policy.

# POLICY PROHIBITING RETALIATION FOR REPORTING CODE VIOLATIONS

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Crewmembers who raise concerns help JetBlue to correct small problems before they grow into larger ones. It can take courage to raise an issue relating to a violation, or a suspected violation, of our Code and we know it can be a difficult decision. That is why we are committed to ensuring that JetBlue Crewmembers will not face retaliation, reprisals, or any career disadvantage for reporting, in good faith, a suspected violation.

Raising a concern in **good faith** means a genuine attempt has been made to provide honest and accurate information, even if it's later proven to be incorrect. The fact that a Crewmember raises concerns in good faith, or provides information in an investigation in good faith, cannot be a basis for separation of employment, demotion, suspension, threats, harassment, discrimination or any other manner considered retaliation, as such retaliation is strictly prohibited. However, if a Crewmember knowingly files a false or misleading report, or intentionally provides false or misleading information or otherwise obstructs an investigation, he or she may be subject to disciplinary actions.

Any suspicion or indication of retaliation should always be reported to a supervisor, manager, the People Department, or the [Business Integrity Hotline](#).

## WHAT SHOULD I DO?

**I am afraid that my career at JetBlue will end if I raise an ethics and compliance concern without hard evidence of wrongdoing. What assurances can you give me that this will not happen?**

JetBlue leadership is committed to maintaining an open environment where ethics and compliance issues can be raised in good faith without negative consequences to the person for doing so. JetBlue leadership will quickly respond to all reported instances of retaliation and take immediate corrective actions. Retaliatory behavior by any JetBlue Crewmember is not tolerated.





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# SAFEGUARD CREWMEMBER INFORMATION

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During the course of our employment, we provide personal, medical, and financial information to the Company. JetBlue is committed to protecting this information, whether in paper or electronic format. Common examples of confidential Crewmember information include:

- Job applications
- Benefits information
- Compensation information
- Medical records
- Contact information, such as home addresses and telephone numbers

Crewmembers' confidential information should not be accessed without specific authorization based on a business-related need. If we access this information because of the nature of our jobs, we must take special care to safeguard it and to use it only to the extent necessary to complete our work in accordance with the law.

At a minimum:

- Laptops storing files containing confidential information should be encrypted.
- Files containing confidential information should be encrypted or password-protected prior to distribution.

# EQUAL EMPLOYMENT OPPORTUNITY

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JetBlue is committed to maintaining a friendly, safe, and equitable working environment in which each of us is treated with integrity, fairness, and respect, free from any type of harassment or discrimination.

JetBlue is committed to fair employment practices in the hiring, advancement, and compensation of Crewmembers.

JetBlue provides equal employment opportunity for all individuals relating to recruiting, hiring, training, and promotion of Crewmembers, and for all other terms and conditions of employment including, but not limited to, compensation, benefits, and eGuidance.

JetBlue expects all of our Crewmembers to honor our Equal Employment Opportunity policy and to treat each other, our Business Partners, and all other personnel with respect in a non-discriminatory manner and without regard to race, color, religion, sex, nationality, age, disability, perceived disability, pregnancy, veteran status, genetic information, citizenship status, marital status, sexual orientation,

## WHAT SHOULD I DO?

**I applied for a job in a different department whose staff consists of five male Crewmembers. The manager made a job offer to a male (I am a female). I feel as though I may have been discriminated against; what can I do?**

If you believe you are being discriminated against, report this to your supervisor, the [People Department](#), or the [Business Integrity Hotline](#).

# DRUGS & ALCOHOL

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and gender identity or expression.

JetBlue is committed to the safety of our Customers and Crewmembers, and strives to maintain a drug-free workplace by enforcing a strict, zero-tolerance, anti-drug and alcohol policy.

## Drugs

JetBlue's [Drug and Alcohol Policy \(DAP\)](#) prohibits the use, manufacture, distribution, sale, or possession of narcotics, drugs, controlled substances, paraphernalia, and literature that promotes illegal drugs and substance use.

JetBlue requires a pre-employment drug screening for all Crewmembers, and may perform further random drug tests throughout your employment here, to ensure a drug-free workplace. Crewmembers who perform safety-sensitive functions as specified under the [DOT/FAA Anti-Drug and Alcohol Program](#) are subject to testing under JetBlue's DOT policy related to that program, in addition to the corporate (non-DOT) policy.

## Alcohol

JetBlue's DAP prohibits any use of alcohol that adversely affects a Crewmember's job performance, or is within eight hours of a Crewmember reporting for work, reserve, training, or other opportunities representing JetBlue.

JetBlue also prohibits the unauthorized use of alcoholic beverages on JetBlue's premises during business hours for both on-duty and off-duty Crewmembers. Accordingly, at no time may Crewmembers consume alcohol while wearing or displaying any part of their uniform, including a JetBlue ID or JetBlue-issued clothing that would identify them as a JetBlue Crewmember.

## WHAT SHOULD I DO?

**I suspect a fellow Crewmember is occasionally coming to work intoxicated and may even be drinking on the job. I'm concerned for this Crewmember's health and safety. What can I do?**

This scenario implicates our first and most important Value: Safety. If you have reasonable suspicion that a Crewmember is intoxicated, you should immediately consult your supervisor who will take appropriate steps to address the situation. You may also report this concern to our [Drug & Alcohol](#) staff at 646-996-0129, 24 hours a day, 7 days a week

# HARASSMENT & DISCRIMINATION

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Each of us is personally responsible for maintaining a work environment that is free from discrimination and harassment. Harassment and discrimination are forms of misconduct that disrupt and undermine both personal and professional relationships in the workplace because of a person's race, color, religion, sex, nationality, age, disability, perceived disability, pregnancy, veteran status, genetic information, citizenship status, marital status, sexual orientation, and gender identity or expression.

Every Crewmember has the right to work in an environment that is free from unwanted and unwelcome harassment and discrimination. JetBlue strictly prohibits all forms of harassment and discrimination and will not tolerate any such behavior in our workplace. We promote open communication to resolve questions, concerns, and complaints involving discrimination and harassment and are further committed to providing an environment that is free of retaliation.

## WHAT SHOULD I DO?

**One of my fellow Crewmembers has a habit of telling off-color jokes. This offends me and others in my group. How can I get this to stop?**

This behavior is not only prohibited by Company policy, but also violates our Caring Value. You have the option of discussing your feelings with that Crewmember. If you are uncomfortable speaking to the Crewmember directly, you should consult your Crewleader or [Crew Relations](#)

**I am a supervisor who has only one minority Crewmember. This Crewmember is having performance problems but I fear giving a negative review would cause discrimination accusations.**

JetBlue strives to curate an open and respectful workplace, and condemns any form of harassment or discrimination in violation of our Equal Opportunity Policy. Every Crewleader should review Crewmember performance with the highest level of integrity, and provide consistent and fair feedback to everyone in the group. Questions about our Respectful Workplace policies, or Crewmember evaluations, can be directed to [Crew Relations](#).

# BLOGS & SOCIAL NETWORKS

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JetBlue understands some Crewmembers may wish to create and maintain blogs and/or social networks. While we respect the right to personal expression, we expect all Crewmembers to refrain from behavior that could adversely impact JetBlue.

If we choose to identify ourselves as JetBlue Crewmembers in any way, or discuss our employment within a social network, we must always include a disclaimer clarifying that the views expressed do not necessarily reflect the views of JetBlue (e.g. I am speaking for myself and not JetBlue). However, it is critical we understand certain statements would be inappropriate in a public forum under any circumstances and even a disclaimer would not protect against legal liability. If we find ourselves in a situation where we are unsure that a disclaimer would avert absolute liability, it is in our best interest to refrain from saying anything at all.

It is imperative we clearly specify the blog is not a company-sponsored source of communication. Otherwise, Business Partners and other third parties may mistakenly view us as spokespeople for JetBlue.

Blogs must not violate JetBlue's conduct-related policies including Insider Trading, Confidentiality, Equal Employment Opportunity, Harassment, Values, etc. as noted in the [Crewmember Blue Book](#). Additionally, blogging must not occur during work hours or through the use of company-provided or company-owned equipment. JetBlue reserves the right to monitor the use of company-provided hardware. JetBlue, at our sole discretion, will determine whether a particular blog or social network posting violates company policies, Values, or operating procedures.

Failure to follow the [Social Media Policy](#) may result in eGuidance up to and including separation of employment, where legally permitted and applicable.

Crewmembers are welcome to share and interact-with public JetBlue content, including JetBlue social media accounts (e.g. sharing, liking, retweeting, or forwarding content from Facebook, Instagram, Twitter). Content designated for internal use may not be publicly shared (e.g. internal email, posts on HelloJetBlue, confidential documents).

## REMEMBER!

A simple exercise to ensure we live the JetBlue Values online is to ask ourselves the following question prior to posting, commenting-on, or sharing content: "Is this something I would want someone to say about me or my family?" If the answer is "no" then simply don't do it!

If we observe something from another Crewmember we believe violates any of JetBlue's policies, we should report this immediately to [Crew Relations](#) at 1-877-241-2430.





# OUR COMPANY

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# CONFLICTS OF INTEREST

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Crewmembers must avoid situations that may cause us to act in ways that are not in the best interest of JetBlue. We should always make business decisions free from any perceived or actual conflict of interest.

A conflict of interest may occur when our outside activities or personal interests conflict, or appear to conflict, with our loyalty and responsibility to JetBlue. Whether a conflict of interest is present in a given situation depends on the particular circumstances involved. An outside activity would be considered a conflict of interest if it adversely impacts a Crewmember's business judgment, job performance, or JetBlue's reputation or relations with others. Outside activities and personal interests that may present a conflict of interest include, but are not limited to:

**Outside Employment & Activities:** Working for, or providing services to a third party organization that is, or is seeking to become, a Business Partner, or competitor of JetBlue may put us in a situation where our interests are conflicted. We must ensure all outside activities are separate from, and do not interfere with, our commitment to JetBlue. Participating in outside employment on company time or using JetBlue's resources to support outside employment are also strictly forbidden. For example, if a Crewmember wants to work for an entity that is part of the travel industry, the potential conflict must be cleared with their Crewleader. The Crewleader should notify JetBlue's [Legal Compliance team](#).

**Employment of Close Relatives:** If a Crewmember's close family relative (spouse or partner, parents/step-parents, child/step-child, sibling/step-sibling, aunt/uncle, niece/nephew, grandparent, grandchild, in-laws, etc.) is working or performing services for an organization that is, or is seeking to become, a Business Partner or competitor of JetBlue, a potential conflict of interest may exist. Crewmembers should connect with JetBlue's [Legal Compliance team](#).

## **Board Membership & Community Activities**

Crewmembers are welcomed and encouraged to volunteer or serve on charitable or community-related Boards of Directors if such service does not detract from our obligations at JetBlue. Sometimes, however, serving on a Board of Directors can create a conflict of interest or even other legal issues. Before assuming a position on a Board, Crewmembers should consult with their direct Crewleader, the General Counsel or another member of JetBlue's [Legal Compliance team](#). Even if a conflict of interest is not present, Crewleaders should notify JetBlue's [Legal Compliance team](#) so we can ensure our Related Parties Database is maintained.

## **Financial Investments**

We must be diligent to ensure our close relatives' financial investments do not compromise our independent judgment, impair our objectivity, or create a conflict of interest. Conflicts may occur if investments are made in current or prospective competitors or Business Partners. We may not directly or indirectly acquire (via buying, leasing, or acquiring rights to) property or materials that JetBlue may also be interested in obtaining.

# RELATED PERSON TRANSACTIONS

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All contracts or transactions entered into, or proposed to be entered into, with individuals that are “Related Persons” must receive the proper review by the Review Committee and, if required, approval by the Audit Committee. Related Persons are defined in the [Related Persons Transaction Policy](#) as JetBlue officers, members of the Board of Directors, significant shareholders, and their immediate family members.

## WHAT SHOULD I DO?

**My spouse owns an interest in a potential Business Partner whom JetBlue is considering doing business with. However, in my position, I will not have any decision making responsibilities as to which Business Partner is selected. Do I need to report anything?**

Yes. All potential conflicts, and even the *appearance* of a conflict, can damage your reputation or that of the company and therefore must be disclosed in writing to both your Crewleader and JetBlue's [Legal Compliance team](#).

# INSIDER TRADING

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Many of us have heard of restrictions on “insider trading.” Simply put, it is illegal for us to buy or sell securities (e.g., stocks, bonds, options, etc.) when we are aware of “inside information”—**material, non-public information**—relating to the securities. JetBlue policy prohibits us from using or disclosing—either intentionally or accidentally—any inside information about JetBlue or one of our Business Partners that we may acquire during our employment here.

We cannot use information obtained through JetBlue, before this information is known publicly, to buy or sell the securities of **any** company, including JetBlue. Nor can we give inside information to anyone else so that they can trade. This restriction applies regardless of where we, or the recipient of the information, may live. JetBlue and regulatory agencies take securities law violations seriously. Government agencies are able to monitor trading activities electronically, and violations of securities laws can result in substantial civil and criminal penalties.

Both JetBlue Crewmembers and JetBlue Business Partners are required to abide by the [Insider Trading Policy](#).

Any information that an investor might consider important in deciding whether to buy, sell or hold securities is classified as “material information.” Some examples of non-public information that could be considered material are:

- Development of a significant new project or service
- Significant changes in our business or route strategy
- Codeshare or alliance agreements
- A stock split or new equity or debt offerings
- The commencement, status or results of significant regulatory or legal proceedings
- Impending bankruptcy or the existence of severe liquidity problems
- Significant changes in our financial results, including increases or decreases in sales or margins,
- Projections of future earnings or losses, or other earnings guidance
- A pending or proposed merger, acquisition or tender offer

# INSIDER TRADING

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Information is considered ***non-public*** if it has not been adequately disclosed to the public. For instance, public filings with the U.S. Securities and Exchange Commission (SEC), company press releases, and meetings and webcasts between JetBlue and the press or public are generally considered to be adequate public disclosure of information. Not only must information be widely available, there must also be adequate time for the market to become aware of the information before trading would be considered legal.

Crewmembers with additional questions regarding the Insider Trading Policy or the ability to buy or sell securities due to insider status should consult with JetBlue's [Legal Compliance team](#).

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 Training on Insider Trading is available on the [JBU Learning Portal](#) in BCSS.

# RECORDKEEPING, FINANCIAL INTEGRITY, & FRAUD

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All information we record or report on JetBlue's behalf, whether for our purposes or for third parties, must be true and accurate. All of JetBlue's records, including accounts and financial statements, must conform to Generally Accepted Accounting Principles (GAAP), must be maintained in reasonable and appropriate detail, must be kept in a timely fashion, and must accurately and appropriately reflect our transactions. Falsifying records or keeping unrecorded funds and assets is never acceptable under any circumstances and may result in separation of employment and/or prosecution. When a payment is made, it can only be used for the purpose for which it was approved.

We have a legal responsibility to provide accurate and complete information to the investing public. When Crewmembers are involved in the preparation of materials for dissemination to the public (including to our regulators), we must ensure the information is accurate and complete. In particular, our senior financial and executive officers must make accurate, complete, fair, timely and understandable disclosure in our public communications, including documents that we submit to our regulators.

JetBlue maintains a zero-tolerance policy for Crewmembers who, through the course of their employment at JetBlue, engage in any scheme to defraud anyone of money, property or honest services. Fraudulent activity violates the law and carries severe penalties. Fraud can range from minor Crewmember theft to a significant misstatement of our earnings and holdings, and is often accompanied by collusion and stealth. Financial fraud can have an adverse effect on our reputation and net worth. All Crewmembers have a responsibility to report all instances of suspected fraud. The activities below are considered fraudulent when done so deliberately:

- Falsifying reports
- Preparing, evaluating, reviewing, or auditing financial statements in error
- Processing, submitting, recording, or maintaining false financial records
- Understating or overstating known liabilities or assets
- Being noncompliant with JetBlue's internal accounting controls
- Inaccurately recording time for reporting purposes
- Cheating on travel and entertainment expense reports
- Travel Companion and Buddy Pass abuse, including the sale or barter of these benefits
- Altering, removing or destroying documents except in accordance with policy
- Selling personal passes, vouchers, TrueBlue points
- Purposely booking tickets with improper fare



# RECORDKEEPING, FINANCIAL INTEGRITY, & FRAUD

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## WHAT SHOULD I DO?

**I learned that some payments were recorded as advertising when they were actually for entertainment. Since the total amount that was spent is accurate, is this a problem if the expense coding is not exactly correct?**

Yes, this could be a problem. Our books must be kept in reasonably accurate detail and reflect all of our transactions. False transactions or misrepresentations about our finances violate our Code and the law. Discuss your concern of the integrity of these payments with your Crewleader, [Corporate Audit](#) or the [Business Integrity Hotline](#).

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 Training on Fraud is available on the [JBU Learning Portal](#) in BCSS.

# PROTECTING JETBLUE'S ASSETS

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We should not treat JetBlue assets as our own personal property, nor should we use them for personal gain. We should never sell, transfer or dispose of JetBlue assets without proper documentation and authorization, which includes bartering of goods and services. All JetBlue assets, facilities or services should be used for legitimate business purposes and not for any unlawful, improper, or unauthorized reason. We must protect JetBlue issued laptops, phones, tablets, other devices, and company or airport-issued badges by not leaving them unsecured.

We should never take any of JetBlue business opportunities for our own personal advantage, nor direct them to a third party. All Crewmembers are responsible for helping to ensure JetBlue's computer systems and other technical resources are used appropriately.

In order to do our jobs, we use JetBlue property, equipment, and technology every day. All Crewmembers have a duty to safeguard these assets (e.g. facilities, equipment, laptops, tablets, phones and other devices, supplies, software, documents, intellectual property —patents, copyrights, trademarks and service marks, information systems, and confidential business information).

## WHAT SHOULD I DO?

**I suspect that a former coworker, who now works for a competitor, has shared JetBlue marketing data with her new employer. What, if any, action should I take?**

If you are aware of anyone misusing or inappropriately disclosing JetBlue's intellectual property or confidential information, or have good reason to believe this is happening, you should promptly report your concerns to our [Legal Department](#) or the [Business Integrity Hotline](#).

**I lost my laptop and/or mobile device that contains JetBlue business information.**

Immediately notify the [IT Service Desk](#) (at 844-538-4873/ USA or 385-275-3364/ International) and your immediate Crewleader.

# INTELLECTUAL PROPERTY (PATENT, TRADEMARKS & COPYRIGHTS)

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Protecting JetBlue's intellectual property is essential to maintaining our competitive advantage. JetBlue's intellectual property includes its patents, trademarks, trade secrets and copyrights, as well as technical knowledge, know-how and experience developed in the course of JetBlue's activities. We are expected to support the establishment, protection, maintenance and defense of JetBlue's intellectual property rights and to use those rights in a responsible way. Intellectual property includes multimedia such as video and audio recordings, software, or written documents. Crewmembers must not:

- Use copyrighted, trademarked, patented, or unlicensed documents and materials (such as reports, software, photos, logos, slogans, music, or videos) without specific permission from the owner.
- Bring confidential information or data from prior employers to JetBlue.
- Assume online media is free for use. For example, image search results are often copyrighted. Crewmembers should contact JetBlue's [Legal Department](#) with any questions or concerns.

## WHAT SHOULD I DO?

**I received an email from my friend Rob who works for a competitor of JetBlue. Rob's email contains confidential information about his company's promotional strategies that could be useful to JetBlue's marketing planning process. I know this was a mistake on Rob's part, but I figured that since I have the information, I can use it. Is this okay?**

Probably not. Crewmembers should use our five Values to guide their actions — which includes acting with Integrity. This means not only do we do things right, but we do the right thing. It's obvious that Rob disclosed this information inadvertently and therefore you shouldn't use it. If ever in doubt, seek guidance from JetBlue's [Legal Compliance team](#).

# CONFIDENTIAL & PROPRIETARY INFORMATION

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JetBlue generally owns all rights to any intellectual property created, updated, and maintained by our Crewmembers during the terms of our employment.

As a result of our work with or for JetBlue, we may become aware of non-public information about JetBlue, our fellow Crewmembers, and our Business Partners. It is critical that we are cautious and discreet when using all information that may potentially be considered as classified, confidential, or sensitive. If disclosed, this information could harm JetBlue, aid our competitors, or place us at a competitive disadvantage in the marketplace. Because of this possibility, we should not use information obtained during our employment for any reason unrelated to JetBlue.

Examples of such information may include, but are not limited to:

- Business strategies and plans
- Potential acquisitions
- Internal surveys
- Unpublished financial and statistical information (both current and forecasted)
- Information about current or prospective Business Partners

Each of us has a duty to keep proprietary information strictly confidential and protected from disclosure. If we think proprietary data has been inadvertently disclosed, please inform JetBlue's [Legal Compliance team](#).

# PRIVACY

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At JetBlue, we respect our Customer's privacy and are committed to protecting personal data collected. Please read our [Privacy Policy](#) which describes our online privacy and security practices in greater detail.

## WHAT SHOULD I DO?

**Your cousin asks you to give her a list of the names, phone numbers, and titles of your department's current and prospective Business Partners. She is starting a new financial investment/counseling service and believes that JetBlue's Business Partners and Customers would appreciate learning about what she has to offer. Should you help her out?**

Of course not! JetBlue's Business Partner and Customer information is confidential, and should not be shared with anyone — not even a close family member.

# COMPLIANCE WITH LAWS

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JetBlue conducts business both in the United States and around the globe. We are subject to the laws, rules, and regulations of the U.S. and those of the countries where we operate. JetBlue strives to comply with all laws, rules and regulations of the places where we conduct our business and to respect the principles upon which they are based. Laws can be complicated and challenging to follow, but confusion or ignorance is not an excuse for non-compliance.

Crewmembers should bring questions about any such laws, rules or regulations, to JetBlue's [Legal Compliance team](#).

# COMPLIANCE WITH POLICIES

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**Financial Integrity Policies:** JetBlue has policies to assist Crewmembers with understanding certain standards that are expected when sourcing goods or services; executing contracts, purchases and disbursements; and providing items of value.

Our [Business Case](#), [Sourcing & Purchasing](#), [Signature Authorization](#), [Contract Review](#), and [Software Management policies](#) protect our assets and provide the appropriate controls needed for us to run our business effectively with our Business Partners and other third parties, avoiding any real or apparent conflict of interest. Crewmembers:

- Should not make any oral or written commitments that create a new agreement or modify an existing JetBlue agreement with a third party.
- Are prohibited from giving or receiving kickbacks. Kickbacks are payments or items of value given to individuals in connection with the purchase or sale of products or services typically for providing discounts in an agreement.
- Should decline gifts offered during an active RFP process.

JetBlue's Strategic Sourcing team is dedicated to finding ways to lower our costs and increase our productivity and quality. We value Business Partners who have the same focus and seek internally for ways to improve their processes and service and willingly pass on cost savings to JetBlue.

Crewmembers must follow JetBlue's [Travel & Expense](#) and [P-Card](#) policies for incurring business-related expenses and reimbursement requests.

## WHAT SHOULD I DO?

**I recently completed an accounting journal entry for a Crewmember, of which I had several questions regarding how the deal was done. My Crewleader could not really answer my questions, but she assured me it was all “on the up and up” and that I should just plug in the numbers as requested. What should I have done?**

It's your responsibility to act with Integrity in everything you do here, including understanding every transaction you enter since you may need to answer questions about its accuracy. Even though your Crewleader approved the transaction, if you still have questions related to the integrity of the transaction, you should feel free to ask a higher level of leadership or utilize the [Business Integrity Hotline](#).

# COMPLIANCE WITH POLICIES

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**Information Technology (IT) Policies:** JetBlue has policies to protect our electronic assets including: data classification and protection, password protection, remote access controls, and the appropriate use of computing devices and networks. JetBlue has the right to require security controls on all electronic and computing devices used to conduct JetBlue business or interact with internal networks and business systems, whether owned or leased by JetBlue, the Crewmember, or a third party.

JetBlue also has the right to inspect at any time, all messages, files, data, software, or other information stored on these devices or transmitted over any portion of the JetBlue network.

Violation of JetBlue's [IT Policies](#) may be grounds for disciplinary action including eGuidance and/or separation of employment, where appropriate and permitted by law.

**Document Retention:** JetBlue is committed to appropriately maintaining complete and accurate records (both hard copy and electronic) consistent with all applicable laws, regulations, requirements and best practices. Our Document Retention Policy is designed to establish systematic procedures for maintaining JetBlue records, documents, emails and other electronic media and, when appropriate, destroying them in an orderly fashion. The policy is intended to manage the costs related to recordkeeping and ensure records which may be required for future reference, or that are required to be retained by law, are retained appropriately and stored economically. The Document Retention Policy also ensures records, email, and other documents are properly destroyed.

## WHAT SHOULD I DO?

### **What is an example of a kickback?**

JetBlue provides discounts to certain Customers. However, if a Customer gets an inappropriate discount, and a Crewmember gets a payment in return, this is a kickback.

### **A friend at another airline has asked to swap network passwords so we can check flight loads. Am I doing anything wrong?**

Yes. Our corporate websites contain valuable information we must protect. Never give your password(s) out to anyone. Sharing a password – even to myIDTravel can compromise the security of our network & information.



# COMPLIANCE WITH POLICIES

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**Investigations & Inquiries:** JetBlue cooperates fully with government inquiries and requests for information. We do not prevent persons affiliated with us from speaking with government officials. Crewmembers should contact their Crewleader and the Government Affairs team before doing so.

When we receive a request for documents or a subpoena, we refer it to our [Legal Department](#), who will coordinate our response and ensure that it is appropriate and complete. We never destroy, alter or change JetBlue records requested by—or related to—a government investigation.

When we receive notice of an investigation or lawsuit, a request for documents, or a subpoena, we preserve all related records and cooperate with the Legal Department in making them ready for evaluation and/or production.

If we are contacted by a government authority (U.S. or otherwise) with regard to a non-routine request for information, we must immediately notify a member of the Legal Department who will determine what information needs to be provided in each case.

Crewmembers with further questions regarding our [Subpoena & Information Request Policy](#), should contact the [Legal Department](#).

## WHAT SHOULD I DO?

**You receive a phone call at your workstation from an unknown person who claims to be “a Business Partner.” The caller mentions pending litigation and begins to ask detailed questions about your work, including items that are not public. What should you do?**

Politely request the caller’s name and reason for calling. General requests for information should be directed to the [Corporate Communications team](#).

# GIFTS

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A “gift” is anything of value you give or receive. Gifts can include: meals and beverages; tickets to entertainment or sporting events; goods or services; use of a residence or vacation home; travel or lodging expenses; discounts; or charitable or political contributions made on someone’s behalf. If the recipient does not pay the normal cost of something, it probably will be considered a gift. If something is available to the public on the same terms that it is being offered to the recipient, it generally will not be considered a gift.

## **Business Gifts**

From time to time, some Crewmembers may receive customary acts of hospitality (including meals or entertainment) from current or potential JetBlue Business Partners or from other business associates. We should use good judgment in accepting such customary, token gifts or favors. It is inappropriate to give or accept business gifts or favors that go beyond customary hospitality in size, cost, frequency or nature. No gift should ever be accepted if the gift would influence, or appear to influence, a business decision.

## **Government Gifts**

We should be aware that certain practices acceptable in the commercial business environment may be completely unacceptable and even illegal when they relate to government employees or others who act on the government’s behalf.

Crewmembers must adhere to the laws and regulations governing relations between government employees and current or potential Business Partners, and other business associates in every jurisdiction where we conduct business.

JetBlue’s policy prohibits Crewmembers from accepting or offering gifts or items of value (including meals and entertainment) to any government employees, elected officials or quasi-governmental authority employees unless it is clear that such gift:

- Does not violate any applicable laws or regulations
- Is not offered with the intent to improperly influence the recipient

## WHAT SHOULD I DO?

### **What are some examples of gifts or entertainment that are never acceptable?**

Some examples of unacceptable gifts are:

- Those that would be considered illegal, or violate laws or regulations.
- Anything offered to a government official in breach of United States and foreign bribery laws.
- Cash or cash equivalents including gift certificates, loans, or stock.
- Gifts that are offensive, sexually oriented, unwelcomed, or those which do not comply with JetBlue's harassment, discrimination, and equality policies.
- Gifts, or an exchange thereof, which could be construed as a bribe.

### **Need to know if a gift is permissible?**

Refer to JetBlue's [Gift Policy](#) or consult the [Legal Compliance team](#) before offering or accepting a gift.



# OUR COMMUNITY AND PUBLIC

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# POLITICAL ACTIVITIES, CONTRIBUTIONS, AND ACTION COMMITTEES

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## **Crewmember Political Activities**

JetBlue values civic engagement, however, JetBlue's name, property, or resources cannot be used to support personal political activities. Crewmember's individual involvement and contributions should never be represented as endorsed by, or on behalf of JetBlue. Crewmembers will not be reimbursed or provided additional compensation for political contributions.

## **Corporate Political Contributions**

In order to protect the economic future of the Company, our shareholders, and Crewmembers, JetBlue participates in the political process to defend against unreasonable, unnecessary, or burdensome legislative, or regulatory actions at all levels of government, and to promote government policies that will lead to business growth. While JetBlue generally refrains from making political contributions, we do on occasion find it in the company's best interest to support individual candidates and party committees.

## **The JetBlue Political Action Committee**

The JetBlue Airways Corporation Crewmember Good Government Fund (JetBlue PAC) is a non-partisan PAC that provides Crewmembers an opportunity to participate in the political process. Contributions made by the JetBlue PAC are funded entirely by the voluntary contributions of JetBlue Crewmembers, meaning no corporate funds are used. Participation in the JetBlue PAC has no bearing on a Crewmember's career at the company.

# MEDIA, ANALYST, INVESTOR AND PUBLIC INQUIRIES

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JetBlue is committed to delivering accurate and reliable information to media, bloggers, financial analysts, investors, and other public forums. All public disclosures, including forecasts, press releases, speeches, and other communications, will be honest, accurate, timely, and representative of the facts. Crewmembers other than those in Corporate Communications and Investor Relations are not authorized to answer questions from the media, bloggers, financial analysts, investors, or other public forums.

Members of the media, bloggers, or other public inquiries are welcome to contact the 24/7 Corporate Communications Media Hotline at 718-709-3089. Analyst and investor inquiries may be directed to our Investor Relations team at 718-709-2022. This guidance applies to all formal and informal requests for information, whether made in person, over the phone, in writing, or using any form of social media.

## WHAT SHOULD I DO?

**A reporter called me looking for some basic information about the Company. Can I answer her questions?**

No. Even simple questions must be rerouted to Corporate Communications because you may not have all the relevant facts. Even if you provide accurate information, releasing it at the wrong time could interfere with the Company's strategic plans. In addition, uncoordinated disclosure could pose problems with securities laws if the information released was material inside information.

# CORPORATE SOCIAL RESPONSIBILITY AND SUSTAINABILITY

## Corporate Social Responsibility

JetBlue's mission is to inspire humanity—both in the air and on the ground. We are committed to giving back in meaningful ways in the communities we serve and to inspire others to do the same.

## Sustainability

JetBlue depends on natural resources and a healthy environment to keep our business running smoothly. Natural resources are essential for us to operate, and tourism relies on having beautiful, natural, and well-preserved destinations for our Customers to visit.

Our Stakeholders are an integral part of our sustainability strategy. Members of the public and JetBlue Crewmembers are encouraged to learn more about JetBlue's [Sustainability Initiative](#). Additionally, JetBlue's annual [Responsibility Report](#) highlights our economic, social, and environmental efforts.

## jetBlue FOR GOOD<sup>®</sup> | AT THE HEART OF CARING

### YOUTH & EDUCATION

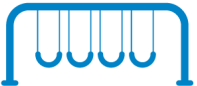

**\$2.7M** Total value of donated books  **\$5M** In monetary donations

### ENVIRONMENT

 **3,016** Pounds of produce donated to local food banks in NYC | **\$4M** VALE GRANT Reducing Emissions at Terminal 5

 **2 BILLION** Total pounds of carbon dioxide offsets

## COMMUNITY

**2011** Year JetBlue launched Community Connection, a Crewmember volunteer program | **27** Playgrounds built  |  **2,554** Organizations supported in 2017

**60,000+** Children have access to new playgrounds |  **\$3,877,646** In-kind donations for organizations like Make-A-Wish, Angel Flight & Together We Rise

 **675K+** Crewmember volunteer hours since 2011

### DISASTER RELIEF

 **\$150K** Cash donations from Crewmembers and Business Partners

# HUMAN TRAFFICKING, CHILD AND FORCED LABOR

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## **Human Trafficking**

As one of the first airlines to sign on to the United States Department of Homeland Security (DHS) and Department of Transportation's (DOT) Blue Lightning Initiative, JetBlue is committed to the efforts undertaken by government and law enforcement agencies in identifying and reporting human trafficking. As a good corporate citizen we will continue to engage and train our Crewmembers on this most important matter.

## **Child Labor**

JetBlue and its Business Partners shall adhere to the minimum employment age limit defined by national laws and regulations, and comply with relevant International Labor Organization (ILO) standards, and must ensure that hours and tasks performed by these individuals does not hamper their education, health, safety, and mental or physical development. Business Partners shall ensure that no underage labor has been used in the production and/or distribution of their goods.

## **Freely Chosen Employment**

JetBlue and its Business Partners shall never utilize any form of forced, bonded, prison, indentured, or compulsory labor including slavery or human trafficking in any capacity.





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# FAIR DEALING

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JetBlue strives to deal fairly, honestly, and in good faith with our fellow Crewmembers, Business Partners, Customers, and all others. We believe the best way to outperform our competition is by conducting our business fairly and honestly, by seeking competitive advantages through superior performance, and never through unethical or illegal practices.

# ANTITRUST & FAIR COMPETITION

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Competition in the marketplace benefits everyone as consumers and U.S. antitrust laws exist to protect that competition. Although the antitrust laws protect those who compete fairly, they also punish those who do not with severe criminal fines, high damage awards, and even jail terms for individuals. U.S. antitrust laws prohibit any agreement that creates an unreasonable restraint of trade.

There are many legitimate reasons why JetBlue Crewmembers may contact other airlines, such as at trade association conferences or meetings to discuss interline agreements or common airport facilities. However, even the **appearance** of an unethical or illegal agreement with competitors can result in costly investigations, antitrust litigation and government enforcement actions.

For this reason, we should not discuss with any competitor topics relating to prices, fares, rates, capacity, discounts, credit terms, terms of sale, fuel surcharges, allocation of markets, Customers, or routes, competitive bidding processes, Crewmember wages, and similar matters. Before attending any meeting or event at which competitors may be present, Crewmembers should know the antitrust rules that govern our conduct. Contact JetBlue's [Legal Department](#) for additional guidance. In addition to agreements that limit trade, the antitrust laws prohibit the actual or attempted "monopolization" of markets through unfair practices. Whether or not a company has "monopolized" a market is typically a complex question, but in any case it is always JetBlue's policy to prohibit unfair competitive practices that are designed to acquire or preserve a monopoly in any market we serve.

## WHAT SHOULD I DO?

### Never discuss or agree with a competitor to:

- Fix fares, prices, other terms of sale or commission rates.  
*e.g: JetBlue may not agree with another carrier to charge the same fares, travel agent commissions or fees for excess baggage.*
- Allocate or divide up customers or markets we serve.  
*e.g: JetBlue may not agree that it will serve one city pair in exchange for an agreement that a competitor will serve a different city pair.*
- Rig a competitive bidding process.  
*e.g: JetBlue may not agree with another carrier on the fares or city pairs that it will include in a Government contract bid.*
- Boycott a Business Partner or Customer.  
*e.g: JetBlue must not agree with another airline to refuse to deal with a specific travel agent or ground handling company.*

# COMPETITIVE INFORMATION

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Crewmembers who collect information on competitors and the markets in which we operate, are expected to do so in a legal, ethical, and respectful manner. Crewmembers are prohibited from obtaining and using competitive information if gathered by espionage, theft, or other unethical means. Sometimes such information is obtained accidentally or is provided to JetBlue by unknown sources. In such cases it may be unethical to use the information. Additionally, we may lawfully receive competitive information during the course of our work at JetBlue, in which case, we would have a duty to protect and maintain this information, and honor all contractual commitments.

## WHAT SHOULD I DO?

**A Business Partner provides confidential information about their pricing during the competitive bidding process. A contact from another company asks to see the bid they were given. The document is marked confidential. What is acceptable in this situation?**

Decline to share the information and suggest they contact the company directly. Improper sharing of information may appear to resemble collusion or monopolization.

# ANTI-BRIBERY & CORRUPTION LAWS

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We expect our Crewmembers and Business Partners to comply with the U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act, and all other applicable anti-bribery and corruption laws in the countries in which we operate. We may not give, promise or offer anything of value to any Customer, government employee, or any other person to influence a decision, secure an advantage, avoid a disadvantage, or obtain or retain business. JetBlue does not tolerate bribery, corruption, or improper payments of any kind in our business dealings, anywhere in the world. This applies to officials in both the public and private sectors. Engaging in such behavior exposes us as individuals and JetBlue as an organization to civil and/or criminal liability. It can also harm our reputation and undermine the trust of our Customers, shareholders, and communities.

The fact that bribery may be an accepted local practice in some foreign countries does not relieve JetBlue or our Crewmembers and agents, from complying with U.S. and foreign corruption laws. Furthermore, JetBlue can be held responsible for FCPA violations committed by a Business Partner. Having reasonable knowledge or suspicion that such activity is occurring and deliberately failing to make a reasonable inquiry of wrongdoing (“willful blindness”) is not a defense under the FCPA for JetBlue Crewmembers or Business Partners.

Additionally, JetBlue must maintain a system of effective internal accounting controls to ensure that disbursements of company assets are properly authorized and recorded. This requirement includes accurate recordkeeping and proper authorization regarding payments and disbursements.

Recordkeeping violations normally involve the following three types of offenses:

- Failure to record improper transactions
- Records that are falsified to disguise aspects of improper transactions otherwise recorded correctly
- Records that disguise the true purpose of the payment
- Refer to JetBlue’s [Anti-Bribery & Corruption Policy](#) or consult with JetBlue’s [Legal Compliance team](#) for any questions regarding this policy, and prior to providing or any questionable gifts, invitations, hospitalities, or other benefits to any kind of government, or foreign official.

# ANTI-BRIBERY & CORRUPTION LAWS

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## WHAT SHOULD I DO?

Who is a foreign government official?

Examples are:

- Officers and employees of a foreign government, department or agency
- Any person acting in an official capacity for or on behalf of a foreign department or agency
- Political parties, political party officials and candidates for public office
- Officers and employees of government owned enterprises (e.g. public airport authorities, schools, hospitals, etc.)
- Officers and employees of public international organizations (e.g. UN, ICAO, government owned airlines, etc.)

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 Training on Anti-Bribery & Corruption is available on the [JBU Learning Portal](#) in BCSS.

# GOVERNMENT CONTRACTING

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JetBlue conducts business with the government and often interacts with government agencies as well as government officials through the course of our work. In every instance, Crewmembers must apply the highest ethical standards and comply with applicable laws and regulations, including certain special requirements associated with government transactions.

All Crewmembers must abide by applicable laws and regulations relating to working with governments, particularly specific requirements associated with government contracts and transactions. When dealing with the government (e.g. submitting bids and proposals and negotiating contracts), Crewmembers must be truthful, accurate, and complete in everything we say, write, and do. All reports, certifications, statements, and proposals must be current, accurate, and complete. All contract requirements must be adequately identified and communicated to the responsible parties. Submission of false, inaccurate, incomplete, or misleading statements can result in civil or criminal penalties for JetBlue as well as the Crewmembers with involvement or knowledge of such practices.

Additionally, in connection with the award, performance, or closeout of a government contract or subcontract, JetBlue requires that we timely disclose in writing to the agency Office of Inspector General (OIG), if we become aware of a principal, Crewmember, agent, or subcontractor who has been involved in:

- Fraud, a conflict of interest, bribery or any violation of gratuity rules
- Any situation involving the government's overpayment on a contract or invoice payment (if overpayment has not been remitted to the government)
- An incorrect or unauthorized charge to the government

JetBlue requires compliance with all of the terms and conditions of our contracts. As a government contractor, we may have additional obligations. Please contact JetBlue's [Legal Department](#) with any questions.

# GOVERNMENT CONTRACTING

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Crewmembers are prohibited from offering anything of value to any individual who is involved in evaluating competitive bids with government entities.

Anything of value is not just limited to cash payments. It also includes:

- Free or discount tickets
- Upgrade to Even More Space® or MINT seats
- Shares of company stock
- Lavish personal gifts and entertainment
- Vacations
- Future job offers
- Political contributions
- Waivers on service fees (e.g., baggage and change fees)

Refer to the [Gift Policy](#) or consult JetBlue's [Legal Compliance team](#) prior to providing or any questionable gifts, invitations, hospitalities, or other benefits to any kind of government, or foreign official.

**We have each made a commitment to operate ethically and to lead with integrity.**





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# RELATED POLICIES

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## Compliance

[Business Integrity Hotline](#)

[Code of Ethics](#)

[Gift Policy](#)

# RELATED POLICIES

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## Crewmember

[Crewmember Blue Book](#)

[Drug & Alcohol Policy](#)

[Social Media Policy](#)

# RELATED POLICIES

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## Company

[Contract Review Policy](#)

[Document Retention Policy](#)

[Insider Trading Policy](#)

[IT Policies](#)

[P-Card Policy](#)

[Privacy Policy](#)

[Related Persons Transaction Policy](#)

[Signature Authorization Policy](#)

[Software Management Policy](#)

[Sourcing & Purchasing Policy](#)

[Subpoena & Information Request Policy](#)

[Travel & Expense Policy](#)

# RELATED POLICIES

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## Community

[Political Contributions Policy](#)

[Responsibility Report](#)

# RELATED POLICIES

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## Industry

[Anti-Bribery & Corruption Policy](#)

**jetBlue<sup>®</sup>**