

# Code of Conduct





## Code of Conduct

### Service Starts with Our Values



#### Dear Southwest,

Since our founding, Southwest Airlines has been known for our legacy of Hospitality and Heart, which starts with our Culture, our People, and our Values. We continue to build on this legacy by conducting our business with integrity, honesty, low costs, and an unwavering commitment to Safety, and, most importantly, to our People and Customers. Our Vision, Promises, and Values guide how we operate daily and live out our Purpose of connecting People to what's important in their lives through friendly, reliable, and low-cost air travel. That is the foundation for all we do and how we serve.

Our Code of Conduct provides the roadmap for how we strive to make the right decisions and position our Company for continued growth and success. Every Employee at Southwest plays a vital role in how we serve our Customers, support our communities, and bring value to our Investors. Ethics and compliance are non-negotiable at Southwest Airlines. We are all accountable for awareness, understanding, training, and compliance with our Code of Conduct, which is designed to clearly outline our commitments to our Employees, Customers, Suppliers, Business Partners, and Investors.

This document provides the resources you need to follow our guiding principles and understand how we successfully operate our airline. If you are not sure how to handle an issue or situation, please speak up, and do not hesitate to talk with your Leader. You will find additional resources to share issues or concerns within this document.

Working together as one Team, with integrity and honesty, is at the Heart of Southwest Airlines. I am proud of our Company, and I am proud of each of you. Thanks so much for all that you do to serve each other and our Customers.

A handwritten signature in black ink that reads "Bob Jordan". The signature is fluid and cursive, with a long horizontal line extending from the end.

Bob Jordan  
President & Chief Executive Officer



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# Southwest's Code of Conduct

## What is the Code of Conduct?

The Southwest Airlines Code of Conduct outlines our commitments to you, our Employees. We strive to operate our airline safely, efficiently, and with integrity. Every individual affiliated with our airline is expected to uphold the standards set in our Company policies and guidelines. Southwest is the airline with Heart, and our work should also demonstrate our Company's Values and policies.

Our Code of Conduct and policies guide how we work and remain in compliance with our governing rules and applicable laws. This document provides the information, tools, and resources to appropriately address situations you may face.

## What is expected of Southwest Airlines Employees?

The Code of Conduct applies to all Southwest Airlines Employees (i.e., full-time, part-time, and Interns). Working for Southwest requires a commitment to remain in compliance with our governing rules and applicable laws. The commitment to work in accordance with the Code of Conduct is what helps set Southwest apart and allows us to operate fairly, honestly, and ethically.



# We Embody the Southwest Heart



Through core tenets like our Purpose, Vision, and The Southwest Way, we create safe, inclusive, and collaborative environments.

Our People are the Heart of Southwest Airlines and set us apart from the rest of the industry. We operate our business with an uncompromising commitment to you, our Employees, and Company, which we live out through our Purpose, Vision, and Values. We nurture a hospitable environment for all who interact with us, internally and externally, by focusing on our Company Vision to be the world's most loved, most efficient, and most profitable airline.

## The Southwest<sup>®</sup> Way

### Our Purpose

Connect People to what's important in their lives through friendly, reliable, and low-cost air travel.

### Our Vision

To be the world's most loved, most efficient, and most profitable airline.

### Company Promise

Southwest will provide a stable work environment with equal opportunity for learning and personal growth. Employees will be provided the same concern, respect, and caring attitude within the organization that they are expected to share externally with every Southwest Customer.

### Employee Promise

I will demonstrate my Warrior Spirit by striving to be my best and never giving up. I will show my Servant's Heart by delivering Legendary Customer Service and treating others with respect. I will express my Fun-LUVing Attitude by not taking myself too seriously and embracing my Southwest Family.

### Values

#### Me

How I Show Up

##### Pride

Have a strong work ethic  
Take initiative  
Be accountable

##### Integrity

Act like an owner  
Choose to do right  
Be courageous

##### Humility

Don't take yourself too seriously  
Keep perspective  
Don't be a jerk

#### We

How We Treat Each Other

##### Teamwork

Practice civility  
Embrace Team over self  
Be inclusive

##### Honesty

Speak up  
Be transparent  
Tell the truth

##### Service with LUV

Practice Hospitality  
Live by The Golden Rule  
Don't be rude

#### Southwest

How Southwest Succeeds

##### Efficiency

Don't make the easy hard  
Keep costs low  
Stay agile

##### Discipline

Be safe  
Be focused  
Be reliable

##### Excellence

Get results  
Win the right way  
Kick tail



# We Make Safety Our First Priority



**We do not compromise on Safety. We strive to operate in full compliance with all applicable laws, regulations, and guidelines.**

- We strive to keep our Employees safe.
- We utilize a leading Safety Management System (SMS).
- We work to understand and educate our Employees on all laws and regulatory requirements.

## **We strive to keep our Employees safe**

Southwest Airlines is committed to the Safety and Security of our Employees—it is our top priority. Our [Safety and Security Commitment](#) is our public pledge to continually work to create and foster a Culture of Safety and Security that proactively identifies and manages risks to the operation and workplace before they become injuries, accidents, or incidents.

## **We utilize a leading Safety Management System**

At Southwest, we embody our commitment to Safety in our Safety Management System (SMS), the guide for operating safely. The SMS includes four main components: Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion. These components are integrated into all processes, establishing a robust structure for Safety at Southwest. We hold all Employees accountable for meeting established policies for their overall Safety. We also focus on eliminating risk through proactive and standardized processes and training. Robust reporting tools and technology help us analyze and monitor our operations to avoid an accident, injury, or incident before it happens. We support and strengthen our SMS through ongoing Safety Promotion, which includes a comprehensive engagement and communications strategy to promote and educate Employees at all levels about our Safety and Security Commitment.

## **We work to understand and educate our Employees on all laws and regulatory requirements**

Southwest works to maintain compliance with all applicable federal, state, and local laws and regulations, as well as those laws and regulations of other countries that may apply to our Company. Legislative and regulatory actions can profoundly impact how we do business; therefore, we work to educate and inform Employees so they understand our vital regulatory compliance requirements.

Maintaining a drug-free workplace is a first step toward managing risk and reducing the potential for injury, incidents, or property loss. Southwest complies with all federal regulations and has a drug and alcohol-free workplace policy that applies to all Employees.

## **Resources**

- [Safety and Security Commitment](#)
- For more information and related policies, Employees can visit:
  - SWALife >Resources >O-Z >Policies >We Make Safety Our First Priority
  - SWALife >Resources >O-Z >Safety and Security

## **All Employees are expected to demonstrate our commitment to Safety by:**

- Following Company policies and procedures.
- Identifying anything that could cause damage or injury.
- Reporting hazards through Companywide reporting tools.
- Knowing and understanding our Safety and Security Commitment.



# We Do Business Fairly, Honestly, and Ethically



## Employees strive to uphold the highest level of integrity in all interactions.

- We maintain the highest standards of ethical conduct.
- We have strong corporate governance, which guides how we operate.
- We preserve our Company's integrity.

### We maintain the highest standards of ethical conduct

As stated in our [Code of Ethics](#), Southwest Airlines is committed to maintaining the highest standards of ethical business practices. We conduct business fairly, honestly, ethically, and in full compliance with all applicable laws, rules, and regulations. All Employees are required to follow our Code of Conduct, Code of Ethics, and Company policies, as well as uphold our Values in every interaction, internally and externally.

### We have strong corporate governance, which guides how we operate

Our [Code of Ethics](#) outlines the basic tenets that guide the behavior of our Employees concerning insider trading, competition and fair dealing, payments to government personnel, confidentiality, conflicts of interest, corporate opportunities, protection and proper use of the Company's assets, recordkeeping, reporting illegal or unethical behavior, and compliance procedures. The Southwest Airlines Board of Directors reviews the Code of Ethics annually.

Southwest implemented procedures for the confidential, anonymous submission of Employee issues or concerns regarding accounting, auditing matters, employment, and Safety as noted in our [Code of Ethics](#). Additionally, Southwest procedures prohibit retaliation for reports made in good faith. Information about the Company's governance practices, Board of Directors, and Officers is available in the [Investor Relations section](#) on [Southwest.com](#).

### We preserve our Company's integrity

Southwest strives to operate our business ethically and with integrity, managing our business and operations with honesty and transparency. Our financial records and reporting systems are monitored with internal and external auditing processes to support the accuracy of our financial statements and disclosures.

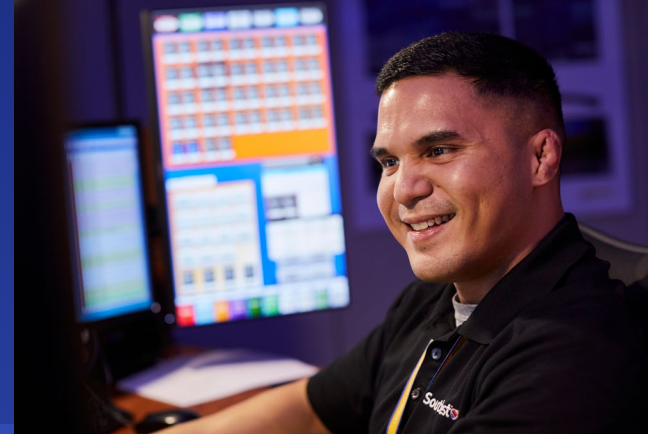
As an Employee, you are expected to use sound judgment and comply with our policies and all applicable laws. You are expected to avoid any appearance of or potential conflicts of interest. Our policy is to comply with all applicable laws with respect to the sharing of material nonpublic information. As an Employee, you are strictly expected to follow our Insider Trading Policy and any applicable insider trading laws.

*Note: Material nonpublic information refers to organizational information, news, events, or other matters that have not been shared by the Company through an appropriate method of public disclosure and can be deemed important for use by a reasonable investor in making an investment decision. Examples of material nonpublic information include financial performance or forecasts, bookings information, capacity forecasts, new products, markets, service offerings, contractual agreements or the loss thereof, organizational changes, executive officer or Board of Directors changes, events related to Southwest securities, changes to credit ratings, cybersecurity incidents, litigation matters, etc.*

## Resources

- [Code of Ethics](#)
- [Investor Relations](#)
- For more information and related policies, Employees can visit:
  - SWALife >Resources >O-Z >Policies >We Do Business Fairly, Honestly, and Ethically
  - SWALife >Resources >O-Z >Safety and Security >Security Reporting System (SRS)

# We Strive to Protect Our Assets and Information



**We seek to maintain the confidentiality, security, and privacy of our Company assets and information. We are committed to responsible technology use and innovation.**

- We strive to protect personal information.
- We work to protect our physical property, confidential information, and intellectual property.
- We strive to preserve Southwest's reputation.
- We work to protect computer and information systems.

## **We strive to protect personal information**

Our business requires us to receive, process, and, at times, share the personal information of our Customers and Employees. Everyone at Southwest is responsible for protecting the privacy our Customers' and Employees' personal information.

Examples of personal information include first and last name, work email address, home address, Social Security numbers, passport information, or credit card numbers. You may only access, use, share, or otherwise process personal information in connection with authorized Southwest business. As an Employee, you must ensure that personal information that you collect, use, or share is done in compliance with our external [Privacy Policy](#) (for Customers), our internal Employee Privacy Commitment (for Employees) and any applicable laws or regulations.

You can also consult Southwest's Privacy Office for questions about the appropriate sharing or use of personal information.

## **We work to protect our confidential information, physical property, and intellectual property**

At Southwest, we view information about our People, aircraft, Company, and facilities as secured assets. We annually review and update our Security Policies and Security Standards to confirm that the proper protections and protocols are in place. Protecting Southwest's property and equipment, confidential and restricted information, and intellectual property is a part of our commitment to you, our Employees.

## **We strive to preserve Southwest's reputation**

We value our reputation as an airline with Heart that puts People first. We expect you to uphold our policies and applicable laws. Our reputation is a source of pride and we work hard to maintain it. All Employees are required to use social media respectfully and responsibly as outlined in the Social Media Policy. We strive to represent Southwest's Values in interactions and communications with all stakeholders, including the communities we serve. To further protect the reputation of the Company while safeguarding our Employees, only the External Communication Team may direct media response on behalf of the Company.



## **We work to protect computer and information systems**

Southwest's computer systems and data are critical to the Company's operations. Cybersecurity is everyone's responsibility, as all Employees—regardless of their position—play a critical role in maintaining the security of our computer systems and data and are expected to adhere to our cybersecurity policies.

Southwest has policies to help protect our network security and electronic assets detailed in our Information Security Policy or Guidelines for Employees.

In addition to our policies, you are an added layer of security and are expected to understand the following best practices to safeguard our computer systems data by:

- Protect your Employee credentials and passwords—and never reveal your password to anyone.
- Use strong passwords, both at Southwest and at home.
- Safeguard yourself from phishing emails by using Outlook resources and report suspicious emails immediately to [suspicious@wnco.com](mailto:suspicious@wnco.com).
- Keep software up to date and regularly connect to the Southwest network through the Virtual Private Network (VPN).
- Utilize the Company's Cybersecurity Awareness Training.

Safeguard yourself from phishing emails by using Outlook resources and report suspicious emails immediately.

- Report suspicious emails to [suspicious@wnco.com](mailto:suspicious@wnco.com).
- Contact [securityawareness@wnco.com](mailto:securityawareness@wnco.com) to report suspicious activity, improper disclosure, theft of Company data, or other network security issues.

## **Resources**

- [Privacy Policy](#)
- For more information and related policies, Employees can visit:
  - SWALife >Resources >O-Z >Policies >We Protect Our Assets & Information
  - SWALife >Resources >O-Z >Policies >People >Social Media Policy

# We Keep Costs Low



**Through operational efficiency and financial stewardship, we are committed to the growth and success of our airline.**

- We work diligently to achieve long-term financial goals.
- We implement effective and efficient procurement practices and spend our valuable capital wisely.
- We aim to keep our costs low so we can keep fares low.

## **We work diligently to achieve long-term financial goals**

Southwest strives to be disciplined and create tangible efficiencies every day. We are intentional and proactive in identifying opportunities to save and spend wisely in all areas of our operation—from business travel and shipping to procurement. Southwest is focused on achieving consistent profitability, growing our route network and revenue, and positioning the Company for future growth. Combined with our unique point-to-point network, low fares, and famous Hospitality, we believe we are in a strong position for future growth and achieving our long-term financial goals.

## **We implement effective and efficient procurement practices and spend our valuable capital wisely**

Working with our Suppliers is an important part of being a good corporate citizen. These relationships not only impact the products and equipment we use in the skies, on the ground, and in our offices; but they also enable Southwest to thoughtfully select partners who also value People, Planet, and Performance through beneficial relationships. Additionally, Southwest's Supplier Diversity Program enables us to extend opportunities to qualified Small, Small Disadvantaged, HUBZone, Minority, Women, Veteran, Disabled, and Lesbian, Gay, Bisexual, and/or Transgender Businesses (Small/Diverse Businesses), who in turn can help Southwest fulfill our operational and business needs.

## **We aim to keep our costs low so we can keep fares low**

We work to operate efficiently, spend wisely and keep costs low to pass that value on to our Customers.

## **Resources**

- [Supplier Code of Conduct](#)
- For more information and related policies, Employees can visit:
  - SWALife >Resources >O-Z >Policies >We Keep Costs Low
  - SWALife >Resources >O-Z >Safety and Security >Security Reporting System (SRS)

## **Supplier Expectations:**

Our [Supplier Code of Conduct](#) identifies the expectations of our airline as well as the expectation of our Suppliers. A Supplier's financial accounting, reports, and records should accurately and fairly reflect transactions in reasonable detail and in accordance with acceptable accounting standards and government regulations. Suppliers should record information completely, honestly, accurately, and promptly.



# We Expect Employees to **Provide Legendary Hospitality** to our Customers



**We work to treat our Customers with care, concern, and respect.**

## **We are dedicated to doing the right thing**

We do not take our commitments lightly, and we are dedicated to doing the right thing and take great strides toward fostering trusting relationships with, Customers, Suppliers, Business Partners, and communities.

We provide transparent policy information through the Southwest [Contract of Carriage](#), [Customer Service Plan](#), and [Tarmac Delay Contingency Plan](#).

## **Resources**

- [Contract of Carriage](#)
- [Customer Service Plan](#)
- [Tarmac Delay Contingency Plan](#)
- For more information and related policies, Employees can visit:
  - SWALife >Resources >O-Z >Policies >We Provide Legendary Hospitality for Our Customers



# We Strive to be a Good Global Citizen



## **We put our Hearts into action as we engage our communities, promote sustainability, and seek to make the world a better place.**

- We establish corporate citizenship principles that focus on People, Performance, and Planet, all supported with strong corporate governance.
- We seek to live out three concepts: loving People, building resilience, and living responsibly to advance Southwest's corporate responsibility and outreach efforts.
- We strive to protect and respect human rights.
- We take pride in being the airline with Heart, which includes respecting our Planet.
- We advocate for our Company at local, state, and federal levels.

## **We establish corporate citizenship principles that focus on People, Performance, and Planet, all supported with strong corporate governance**

Southwest's Vision is to be the world's most loved, most efficient, and most profitable airline. The nature of corporate citizenship aligns with this Vision in a variety of ways as we care for People, extend our Heart for the Planet, and strive to deliver strong operational and financial performance. Read more in the [Southwest One Report](#).

## **We seek to live out three concepts: loving People, building resilience, and living responsibly to advance Southwest's corporate responsibility and outreach efforts**

We put our Hearts into action as we engage our communities, promote sustainability, and work to make the world a better place. We empower you to do well by doing good, develop programs to meet the needs of our diverse communities, and engage with business, civic, and community leaders to be a globally trusted citizen fostering authentic relationships that empower communities. Whether in the air or on the ground, we believe community is more than a place—it is at the Heart of what brings us together.

Southwest Airlines [cultivates relationships](#) with more than 400 local and national organizations to generate impact across our communities. Our giving focuses on strategic areas which include workforce development; diversity, equity, and inclusion; and environmental sustainability. Southwest strives to support our communities during times of crisis by partnering with national and local organizations for preparedness, response, and resiliency services.

## **We strive to protect and respect human rights**

Southwest is committed to protecting and promoting human rights in every aspect of our business as outlined in our [Human Rights Policy Statement](#). Our focus on human rights is visible through various initiatives, including our diverse recruitment efforts, robust Employee training, commitment to Hospitality and civility (both internally and externally), dedication to an ethical supply chain, and support of community organizations to promote awareness. Southwest is committed to training and educating you on various human rights issues and important topics.

Southwest's [harassment policy](#), equal employment opportunity policies, accommodations policies, and [human trafficking statement](#) are available and accessible to all Employees. Southwest expects you to act responsibly and maintain a positive working environment, allowing every Employee to perform at their maximum potential. We encourage you to bring any questions or concerns regarding harassment, sexual harassment, discrimination, or retaliation to their Leader.

## **We take pride in being the airline with Heart, which includes respecting our Planet**

Southwest strives to effect meaningful change by investing in transformational programs and initiatives that complement our efforts to advance environmental sustainability. We have set long and near-term goals, as well as a four-pillar strategy to Reduce, Replace, Offset, and Partner, which includes our signature corporate responsibility environmental sustainability program, Repurpose with Purpose. This global sustainability initiative upcycles items such as leather aircraft seat coverings and transforms them into new products.

Our long-term goal is to achieve net zero carbon emissions by 2050. We have developed a path to achieve our net zero goal that requires an integrated approach across several important initiatives. These initiatives include improving our operational efficiency, investing in fleet modernization, advocating for air traffic control modernization and other NextGen Federal Aviation Administration initiatives, expanding our use of sustainable aviation fuel (SAF), and leveraging carbon removal opportunities. SAF remains our most impactful lever; however, expanding our use of SAF remains critically dependent on many factors outside of our control.

## **We advocate for our Company at the state and federal levels**

Our Governmental Affairs Department works to stay up to date on proposed statutory and regulatory changes to directly educate a wide range of policymakers and Stakeholder groups. They also present our views on these topics through trade associations, business forums, chamber organizations, and interactions with public officials at the federal level and in the states and communities we serve.

We participate in the trade association [Airlines for America](#) (A4A), allowing us to gain insight into core issues for the airline industry and to advocate jointly for regulations that support a healthy, competitive industry. Southwest leverages a policy to use our affiliated political action committee and the Southwest Airlines Co. Freedom Fund ("Freedom Fund"), financed by contributions made voluntarily by Employees, to support political campaigns. Company funds are limited to supporting selected political campaigns at the state and local level in compliance with the laws of the relevant states and localities. When considering Freedom Fund contribution requests, there is a time-tested evaluation and review criteria process for giving annually. All contributions by the Freedom Fund are disclosed via publicly available reports filed monthly with the Federal Election Commission. Southwest Airlines is committed to complying with all applicable federal, state, and local campaign finance restrictions and disclosure requirements.

## **Resources**

- [Corporate Citizenship](#)
- [Southwest Airlines One Report](#)
- [Human Rights Policy Statement](#)
- For more information and related policies, Employees can visit:
  - SWALife >Resources >O-Z >Policies >We Strive to be a Good Global Citizen

# We Support Our Employees



**Our Employees are the foundation of our Company. We offer programs, policies, support, and guidance to take care of our Employees, who are the Heart of Southwest.**

- We foster a safe and respectful work environment.
- We value Diversity, Equity, and Inclusion.
- We hire and develop top talent.
- We strive to offer industry-leading benefits.

## **We foster a safe and respectful work environment**

Southwest recognizes, respects, and values differences, and at our core is a Culture of caring. We are committed to being a healthy organization where you can thrive, feel appreciated and valued, and have an authentic sense of belonging. As an Employee, you are responsible for preserving and invigorating our Culture, regardless of position or tenure, which strengthens our Culture of caring. We encourage you to report, without fear of retaliation, violations of our policies to a Leader or a contact referenced on SWALife >Resources >Policies >Resources. We do not tolerate discrimination, bullying, retaliation, or harassment.

## **We value Diversity, Equity, and Inclusion**

At Southwest, our Heart represents our identity. It is more than the symbol of our brand. It is who we are. We are a Company of People, representing diversity in the areas of culture, background, experiences, and viewpoints. Each of our Employees brings their talents, creativity, and individuality. And together, we make Southwest the incredible Company it is. Our People are the Heart of Southwest Airlines. Southwest's Story of Inclusion is founded on access, unity, and acceptance. We truly believe that it takes every single one of us to build diverse, equitable, and inclusive experiences. We understand that for every Employee at Southwest to thrive, we must foster an environment of impartiality, fairness, representation, and balance.

We are committed to listening to our People and doing our part to drive meaningful change, both inside and outside the Company. Working alongside our diverse Suppliers and community partners, we champion DEI in the communities we serve. Like many other companies, we are on a journey, and we recognize that there is always more we can do to make our work environment even better, and even more accepting. We are committed to enhancing our DEI efforts with a particular focus in the areas of Talent, Culture and Values, Brand and Reputation, and Communication. To reach our goals and aspirations, we must allow for vulnerability, engage in courageous conversations, and listen to you, our Employees. Our Diversity Council serves as a strategic asset to the business by promoting a work environment that celebrates differences, fosters inclusion, and leverages diversity to enhance organizational performance. Our Employee Resource Groups and Employee-Led Groups are inclusive and open to all, creating community among Employees while promoting diversity, equity, inclusion, and fostering relationships.



## **We hire and develop top talent**

Empowering you to realize your full potential cultivates the next generation of talent and Leaders. Along with initiatives designed to attract new Employees, we have also implemented initiatives to develop and retain our phenomenal Employees.

We want to enable our People, present and future, to achieve their professional goals through learning and personal growth. We offer multiple programs to provide talent development opportunities for Employees at all levels, no matter where they are at in their Southwest career.

## **We strive to offer industry-leading benefits**

Employees' Total Rewards at Southwest include competitive financial compensation; health and well-being benefits, including medical, dental, vision, and a host of voluntary insurance benefits and health support services; parental leave; paid time-off; paid sick time; robust retirement programs including a 401(k) Plan with a generous Company match; a ProfitSharing Plan contribution (based on Board discretion); travel privileges; and many other perks and discounts. Southwest provides you with dedicated resources and benefits at no cost to support mental, physical, and financial well-being, when and where you need it most.

## **Resources**

- For more information and related policies, Employees can visit:
  - [SWALife >Resources >O-Z >Policies >We Support Our Employees](#)
  - [SWALife >Resources >A-E >Diversity, Equity, and Inclusion](#)
  - [SWALife >Life & Career >Career & Learning >Training & Development](#)
  - [SWALife >Life & Career >Employee Services >Total Rewards \(Benefits/Perks\)](#)