



Alaska Air Group  
Companies

# Code of Conduct and Ethics



Revision 1 APRIL 2020

Code of Conduct and Ethics Policy is the responsibility of the Legal Division and cannot be changed without approval of the Senior Vice President of Legal, General Counsel or the Managing Director of Corporate Affairs and Compliance.

# Table of Contents

## A note from Brad

### **WELCOME to our Code of Conduct and Ethics**

Who's covered by our Code  
What about our suppliers  
When does our Code apply

### **Using our Code**

How to ask a question or report a violation  
What happens after you report something  
Non-punitive reporting  
Cooperating with internal investigations  
Our commitment to no retaliation

### **A culture of safety and compliance**

Staying safe  
Our key regulators  
Drugs and alcohol  
Requests for information  
Competing fairly  
Avoiding corruption and bribery  
Representing the facts and numbers accurately  
Avoiding insider trading  
Avoiding conflict of interest – receiving and giving gifts, taking a second job  
Participating in civic or political activities

## **Our work environment**

Diversity and inclusion  
Unlawful harassment and discrimination  
Sexual harassment  
Bullying and violence  
Social media

### **Protecting our resources**

Handling company property with care  
Handling others' proprietary rights with care  
Keeping confidential information confidential  
Protecting your personal and private information  
Protecting the environment

# A note from Brad

To all Alaska Airlines, Horizon Air employees and its Board of Directors:

**T**he key part of creating an airline people love is living by our values. This means following our Code of Conduct and Ethics, which is the foundation of our core value of *Do the right thing*.

Our Code is designed to help Alaska and Horizon employees succeed by building a culture of open communication, trust, and camaraderie with our guests, suppliers, and each other.

*Doing the right thing* isn't always easy. When you see something that falls short of our values or our Code, I expect you to tell someone. This could be a leader, the Ethics and Compliance Hotline, or me. When you do that, you can expect your

leadership – including me – to stand behind you.

Part of *Doing the right thing* is ensuring everyone is encouraged to speak up when something isn't right, and I take this commitment to Alaska and Horizon employees seriously. Retaliation will not be tolerated.

All of us are required to know and follow our Code. This includes frontline employees, leadership, and our Board of Directors. Take a few minutes to read our Code, then take it to heart and use our values to guide your decision-making every single day. Thank you for committing to creating an airline people love.



Sincerely,

A handwritten signature in black ink that reads "Brad".

**Brad Tilden**

**Chairman, President and Chief Executive Officer,  
Alaska Air Group**

# WELCOME to our Code of Conduct and Ethics

## Who's covered by our Code

If you work for or are an officer or director at Alaska Air Group (AAG), Alaska Airlines, or Horizon Air (which may be referred to as “Companies” throughout the Code), then you're expected to follow this Code of Conduct and Ethics (Code).

Each year, all employees and directors are required to acknowledge their responsibility to comply with our Code. Failure to follow our Code could result in discipline or even termination of employment.

We expect everyone who is covered by our Code to read, understand, and apply it by:

- Doing your job in an honest, safe, professional, and courteous manner - while abiding by all applicable laws, regulations, and policies.
- Treating guests, suppliers, and fellow employees with dignity and respect.
- Avoiding situations where your interests conflict with the interests of the Companies.

The Code is available on Alaska'sWorld and OnYourHorizon for employees and under the Investor Relations section of Alaskaair.com for external access. The electronic document on the intranet supersedes any other version previously printed or otherwise retained.

## What about our suppliers

AAG Companies also have a [Supplier Code of Conduct](#) that describes our expectations of Suppliers. Suppliers, their employees, sub-contractors, and agents must comply with the Supplier Code of Conduct to do business with any of the AAG Companies. For more information or to discuss questions about the Supplier Code of Conduct, talk with your supplier manager.

## When does our Code apply

If you are covered by our Code, it applies anytime you are performing your job or are otherwise representing AAG, Alaska, or Horizon. This includes when you are out of town on business or on layovers.

# Using our Code

## How to ask a question or report a violation

While our Code strives for clarity, it may not address every situation. You may face situations where you feel unsure about what's right under our values or policies. When that happens, talk to your manager, supervisor, or Human Resources personnel about what you should do.

**Anonymity** - If you have a question and want to ask it anonymously, you can always call our Hotline number which is printed on the back of your badge or in our Code. All reports or questions from the Hotline are forwarded to the Ethics and Compliance department for prompt review and response.

**Collective Bargaining Agreement** - If your concern involves your collective bargaining agreement, also follow the procedures available under that agreement.

## Contacts

***The Ethics and Compliance Hotline is available 24/7:***

- US/Canada: 1-888-738-1915
- Mexico: 001-800-840-7907 (Spanish);  
001-866-737-6850 (English)
- Costa Rica: 1.855.828.3820
- Online: [www.aag.ethicspoint.com](http://www.aag.ethicspoint.com)

***The People Team***

- People Resource Line: 1-844-899-3617  
(Alaska and Horizon employees only)  
Monday – Friday (except Holidays)  
8am – 5pm PST
- Email: [HRBP@alaskaair.com](mailto:HRBP@alaskaair.com)

## What happens after you report something

The Ethics and Compliance department partners with HR or other responsible divisions to review concerns brought forward via the Hotline. If an investigation is launched, it will include a review of all available relevant information and discussions with knowledgeable individuals. Investigations might involve representatives from Legal, HR, Labor Relations, Customer Advocacy, union leadership, our operations teams and others. Once an investigation has concluded, we act in accordance to our values and policies. To respect confidentiality of all parties involved, the action taken is not always shared with the person who raised the concern.

## Non-punitive reporting

We recognize everyone makes mistakes. Our policy is to encourage employees to report Code issues involving their own conduct so we can offer guidance and help resolve issues that may be inconsistent with our Code. To help you, we have two self-reporting programs:

- Aviation Safety Action Programs (ASAP)
- Ground Safety Action Program (GSAP)

Remember, you must meet the standards of the specific self-reporting program to qualify. Self-reporting is not, by itself, a way of avoiding the consequence of conduct or performance issues that do not meet the criteria of a non-punitive reporting program.

You can access these reporting programs on the Report It! application or [Safety webpage](#).

## Cooperating with internal investigations

There may be situations when AAG, Alaska, or Horizon conducts an internal investigation concerning possible violations of regulations, laws, or policies. If you are involved in an internal investigation, you should provide all requested documents and information, and be forthcoming and truthful in response to questions from authorized personnel or individuals. In similar respects, you should not destroy or alter any documents. If you are covered by a collective bargaining agreement, you may receive support from union leadership in the internal investigation.

***For more information, refer to:***  
[Records & Information Management Policy](#)

## Our commitment to no retaliation

We pride ourselves on being a safe place to work. Anyone who reports a violation of our Code truthfully and in good faith (meaning you have honest intentions) is protected against retaliation from any leader, co-worker, or director. If you believe you have been the target of retaliation, contact the Ethics and Compliance department, HR, or a leader you trust.

***For more information, refer to your HR manual:***  
[Alaska-Our People Policies](#) and [Horizon-Personnel Policies](#)

# A culture of safety and compliance

Managing an airline is complex. Our industry is highly regulated – federal, state, and local agencies, as well as other countries where we do business, have or claim to have jurisdiction over virtually every aspect of our operation. Because of that, we expect you to be aware of key laws and regulations that cover your work.

## Staying safe

Our number one priority is the safety of our guests and employees. In fact, we often hold ourselves to a higher standard than the law requires. We follow all the applicable laws that govern health and safety, give you safety equipment when needed, and insist you work in a safe manner. Every employee should stop work if safety problems are encountered and report or resolve those problems, reaching out to their manager or supervisor, as needed.

Nothing in this Code prohibits employees from exercising their legal right to contact any governmental agency on a confidential basis when they have reasonable concerns regarding the legal or safety implications of any action taken by employees or any other person acting on behalf of the Alaska or Horizon. We also encourage employees to bring such concerns to the attention of any member of management (including any member of the Alaska or Horizon Safety Division) in keeping with its open-door policy. Such concerns will be treated confidentially whenever possible, and no retaliation or harassment of employees voicing such concerns will be tolerated.

**For more information, refer to the:** [Alaska and Horizon Safety Manual](#)

## Our key regulators

Alaska and Horizon regularly interact with U.S. regulatory agencies such as: the Department of Transportation (DOT), the Federal Aviation Administration (FAA), the Department of Homeland Security (DHS), and the Securities and Exchange Commission (SEC).

DHS, for instance, oversees the security of passengers, employees, and aircraft. The DOT monitors how we handle delayed, cancelled, or overbooked flights; how we accommodate passengers with disabilities; and how we advertise our schedules and fares and the Federal Aviation Regulations cover much of how we fly our aircraft and conduct ground operations.

These agencies and others have an impact on almost everyone working at Alaska and Horizon. Employees should understand the rules that govern them so we remain safe and stay consistent with our Code and other policies

## Drugs and alcohol

To ensure public safety, we are held to a higher standard when it comes to having drugs or alcohol in our system while at work. Additionally, employees who perform certain safety-sensitive duties are subject to DOT-FAA drug and alcohol regulations and the Companies' policies, which are in many cases more stringent than DOT-FAA regulations.

There may be occasions where we serve alcohol at an AAG, Alaska, or Horizon event. If you choose to drink at these events, use good judgment. If you are planning an event, make sure you get the necessary approval.

These guidelines also apply during:

- Business trips
- Layovers
- Functions hosted by one of our suppliers
- Other professional or community meetings

**For more information on these policies, refer to the following manuals:** [Alaska-Drug and Alcohol Policy](#) or [Our People Policies-Alcohol at Company Event](#) or [Horizon-Drug and Alcohol Policy](#).

Alaska employees can also reference the [Drug Abatement subsite](#) for helpful links, FAQ's and Leader responsibilities.

## Request for information

If you receive a routine request for information from a regulatory agency, you should inform your manager and coordinate with your division's compliance representative to cooperate with the requesting agency. You should not respond yourself without that coordination or authorization from your division's compliance representative.

Do not accept service of any legal documents. If you receive a subpoena, letter, e-mail, phone call, personal visit, or other request for information from a government or law enforcement agency or an outside lawyer, contact the [Legal division](#) immediately for guidance.

**For more information, refer to the following policy:** [Requests for Information, Warrants, and Subpoenas](#)

## Competing fairly

The Companies compete aggressively yet fairly with other U.S. airlines and, increasingly, with Canadian and Mexican carriers. We follow federal and state antitrust laws that prohibit monopolistic conduct, agreements that restrain competition, and other anticompetitive activities. To that end, we must be especially cautious when speaking with our competitors. A4A, RAA, and other industry groups are great for working together on issues of common interest to the airline industry, but never to coordinate or agree – even informally or indirectly – on competitive topics such as routes, frequencies, capacity levels, fares, fees, or other charges. If you work in Alliances, Network Planning, Pricing, Cargo, Revenue Management, Airport Affairs & Development, or another department that has frequent dealings with other airlines, Legal is available to answer questions and to provide periodic training on antitrust awareness.

**For more information, refer to the:** [Antitrust Policy](#)

## Avoiding corruption and bribery

It is unlawful for the Companies to offer anything of value to a foreign official to influence them, induce them to violate their duties, or otherwise gain an improper business advantage. The laws in this area are strict: even minor favors like complimentary upgrades, Lounge passes, and fee waivers may be viewed as an illegal bribe. We are responsible for the conduct of vendors acting on our behalf, so watch for red flags such as overly familiar relationships with foreign officials, a reputation for corruption, unusual or suspicious financial arrangements, or refusal to be audited. Anti-corruption laws also require us to keep meticulous records about any payments we or our vendors make to foreign officials. It's not always easy to tell if a guest, vendor, or potential business partner is a foreign official, so if you're contemplating a new business arrangement outside the U.S., start by working with Legal or Supply Chain Management to assess the situation.

*For more information, refer to the: [Anti-Corruption Policy](#)*

## Representing the facts and numbers accurately

As a publicly-traded company, it is critical that we provide complete, accurate, and timely information concerning the Companies. We communicate this information in a variety of ways, including by filing reports with the SEC, giving press releases, airing webcasts, and attending and announcing at industry and financial conferences. Even if you do not directly prepare these reports and communications, you may be involved in the process of recording or gathering the underlying information. If you are involved, we ask that you follow the accounting rules and the Companies' policies that apply to your work.

## Avoiding insider trading

You may own Alaska Air Group stock through an employee stock purchase plan, as part of your Alaska or Horizon compensation package, or through individual investment activities. When trading Alaska Air Group stock, you should take precautions to make sure your decisions are not based on "insider information." Insider information is a fact(s) about Alaska Air Group, Alaska, and/or Horizon that is not public knowledge.

You should not trade, or encourage others to trade, Alaska Air Group stock based on insider information. Insider trading may result in disciplinary action, including termination, and/or civil or criminal sanctions. Alaska Air Group's Regulation FD Policy, as required by the SEC, limits what we can say to brokers, analysts, bankers, and other financial professionals without simultaneously disclosing it to the public.

Depending on your job, you may also have stock trading windows and blackout periods. You should make sure you are aware of and follow these guidelines.

*For more information, refer to the following policies:*

- [Our Financial Control Policies](#)
- [News Media Policies for: Alaska-Our People Policies and Horizon-Personnel Policies](#)
- [Insider Trading Policy](#)
- [Regulation FD Summary and Statement of Policy](#)

## Avoiding conflict of interest – receiving and giving gifts, taking a second job

A conflict of interest occurs when your personal interests or activities, or those of your immediate family members, interfere with your ability to make sound and objective decisions in the best interest of the Companies.

We ask that you do not participate in activities that may create, or appear to create, a conflict of interest with any of our Companies. Even with the best of intentions, the appearance of a conflict of interest can damage our reputation.

We're committed to award business solely based on legitimate business considerations, including quality, service, and competitive price. This means that you and your immediate family members should avoid investments or other financial activities that could interfere, or appear to interfere, with your ability to remain objective and loyal to our Companies. Likewise, you shouldn't show favoritism when choosing suppliers, vendors, and partners.

*To help you better understand this policy and avoid conflicts of interest, here are a few guidelines to follow:*

- Alaska and Horizon will not do business (other than the provision of airline services) with a supplier, guest, or vendor when it is owned (greater than 1%) by an employee or an immediate family member of an employee, without the prior written approval of the Chief Compliance Officer.

- Employees may not own 1% or more interest in a competitor, without the prior written approval of the Chief Compliance Officer.
- Employees may not make a loan to, or receive a loan from, a person or company, that our Companies do, or seek to do business with, other than large banks or other lending institutions.

## Receiving gifts

Another situation where your interests may become or appear conflicted is when you accept gifts or other business courtesies that relate to your employment with Alaska or Horizon. Accepting these can be interpreted as an attempt to influence your business decisions. Examples include discounts, passes, use of equipment/facilities, personal favors, meals, drinks, or entertainment, such as tickets to cultural or sporting events.

You should make business decisions solely on legitimate business interests and take precautions when situations include the offer of gifts or business courtesies.

In some situations, the exchange of gifts or courtesies may be acceptable. For example, opportunities to enhance the business relationship through social, cultural, or sporting events as the guest of a vendor or supplier may be acceptable if it doesn't influence business decisions. Privileges that are generally available to persons involved in the travel industry, such as travel industry discount rates at hotels and car rentals, are also exempt from this policy.

***Because many situations may not be clear, here are some additional guidelines and criteria to follow:***

- Never accept cash or cash equivalents (like prepaid credit cards) in the normal course of business. It may be appropriate to accept **gift cards**, so long as they are \$25 or less and follow the other guidelines above.

- Let your division vice president and the Chief Compliance Officer know of all offers of gifts or business courtesies from organizations where you are the relationship manager, purchasing decision maker, or purchaser.

- If you're not the relationship manager, purchasing decision maker, or purchaser, you may only accept a gift or business courtesy if it is within the range of usual and customary gifts and business courtesies that are exchanged in similar circumstances in the industry.

- If in the range of usual and customary gifts and the value exceeds **\$250**, you should put it in **writing for your supervisor**, either in an email or written letter. If a gift is more than **\$500**, you need to get approval, in advance, from your division vice president or above.

- In the same respect as receiving gifts or business courtesies, you should not solicit gifts or business courtesies from anyone conducting or seeking to do business with Alaska or Horizon.

- Some divisions may set more restrictive policies for their employees, so be sure to review the policies for your division.

## Giving gifts

Offering or giving gifts and business courtesies follow similar guidelines as receiving them. If you offer or give a gift or business courtesy on behalf of Alaska or Horizon, make sure it supports legitimate business interests. You should not give a gift or business courtesy, no matter how modest, if it could be viewed as an attempt to improperly promote the Companies' business. You should also ask about and be sensitive to the gift policy of the company with which you are doing business.

There are strict rules that apply when doing business with U.S. or foreign government officials. You cannot give any gifts to Members of Congress, their staff, or federal Executive Branch officials. This includes giving gifts of even nominal value (e.g., promotional items, upgrades, waiving fees, etc.). Similar limits exist for gifts to most state and local officials. When there are exceptions, you should get prior approval from the Government Affairs department before offering any gift.

There are also rules governed by the U.S. Department of Labor that prohibit certain union officials from receiving certain monetary payments, certain travel-related privileges (for non-employees), and certain other “things of value” that could create or appear to create a situation where a union official’s decision could be influenced.

**For more information, refer to the following policies:** [Congressional & Executive Branch Gift Policy](#) and [Horizon Employee Resources](#)

## Taking a second job

We understand that some employees may choose to take on a second job. If you take on outside work, make sure that it doesn’t interfere with your work with us such as showing up late, calling in sick, or leaving early to do outside work.

In general, you cannot take a second job if it can affect or appear to affect your ability to make decisions in the best interest of Alaska or Horizon. You cannot take a job that would create an actual or perceived conflict with the Companies’ interests, such as employment with a supplier or competitor.

While these arrangements are generally discouraged, there may be limited circumstances in which they are approved. Examples where they may be approved include serving as an officer or on the board of directors of a supplier competitor, or any entity with which Alaska and/or Horizon do business (other than the provision of airline services). In such circumstances, you can ask for a written approval from your division vice president by completing the [Outside Employment Request form](#).

The division officer and/or Executive Committee member must consult with the Chief Compliance Officer before granting permission for any outside employment or business affiliations.

Even when the second job opportunity is not with a supplier or competitor, you must inform your supervisor or manager and complete the [Outside Employment Request form](#) before accepting the position.

If you have questions about second jobs, talk to your supervisor, manager, or HR.

**For more information on outside employment including examples of what constitutes outside employment, refer to:** [Alaska - Our People Policies](#) and [Horizon Employee Guide](#)

## Participating in civic or political activities

It’s a privilege to participate in public affairs and political activities such as holding an office in local government, voicing your opinion at a city council meeting, or attending a fundraising event for a political party or candidate. We encourage you to get involved, but on your own time. Your public or political activities should not interfere with your job performance or create an actual or potential conflict of interest for Alaska or Horizon.

Elected officers of one of our Companies may authorize public or political contributions on behalf of the respective company, if approved by the Government Affairs department or the General Counsel.

# Our work environment

Our Companies are committed to cultivating a great work environment, where everyone can reach their full potential. Our employees are expected to foster a workplace culture that is free of unlawful harassment, intimidation, bias, and discrimination.

## Diversity and inclusion

We create an airline people love by hiring a diverse workforce and creating a positive, supportive workplace where everyone feels safe and welcome. Our diversity and inclusiveness make us stronger companies.

Alaska and Horizon are equal-opportunity employers. We make decisions about hiring, promotions, and pay without regard to race, color, creed, religion, national origin, alienage or citizenship status, age, sex/gender, sexual orientation, gender identity or expression, marital status, pregnancy, familial status, physical or mental disability, protected military or veteran status, genetic information, or any other basis protected by applicable law.

As an employee, you are expected to support and welcome the diversity of our teams. If you would like more resources or want to get involved in diversity initiatives, contact [diversity.inclusion@alaskaair.com](mailto:diversity.inclusion@alaskaair.com).

## Unlawful harassment and discrimination

We also strive to create a great work environment where our employees feel respected and valued – unlawful harassment and discrimination is prohibited. We don't tolerate behavior that creates an unlawful hostile work environment, which means we don't make derogatory jokes or slurs about our co-workers, use unwelcome gestures, or pass around offensive or rude emails, texts, or printed materials based on their status in a protected class.

Remember, it's not only our Code and the Companies' policies that prohibit unlawful harassment or discrimination – federal, state, and local laws do as well. If you're a manager, a big part of your job is to ensure there is no unlawful harassment or discrimination occurring among the people who report to you. If you see or hear anything that might be unlawful harassment and discrimination, or even just inappropriate workplace behavior, you must report the behavior immediately to your leader or HR.

## Sexual harassment

Sexual harassment and assault have absolutely no place in our workplace or on-board our flights. Sexual harassment can be unwelcome conduct that's sexual in nature. It can be conduct that is threatening, demeaning, or offensive. It can be verbal, physical, or visual conduct. It can create an intimidating, hostile, or offensive work environment, interfering with an employee's and the team's work performance.

# Bullying and violence

Being kind-hearted is at the core of how we treat guests and each other. We don't tolerate bullying behavior. If a co-worker bullies you or other employees, either at work, online, or via social media, we ask that you try to help stop that behavior by talking with the co-worker. If that doesn't work, report it to a leader you trust or to HR.

Sometimes bullying or other workplace confrontations may turn violent. If that happens, employees need to take steps to immediately stop the violent behavior. That may mean calling your local law enforcement officials, a manager or a supervisor, as well as contacting Alaska Airlines' security at [security@alaskaair.com](mailto:security@alaskaair.com). If the situation seems out of control, you should first call local law enforcement before calling Alaska Airlines' security or anyone else.

Be sure to notify Human Resources of any protective orders in effect, or if a potentially violent non-work related risk exists that could result in violence in the workplace.

***For more information on all of these policies, refer to: [Alaska-Our People Policies](#) and [Horizon-Personnel Policies](#).***

## Social media

Almost everyone uses social media in one way or another and we respect your right to post information online. In that regard, you should not use social media to harass or bully co-workers, guests, or anyone else related to Alaska or Horizon.

Please respect others and the Companies' confidential information when using social media. You should not post information that isn't public knowledge. For example, confidential information includes new flight routes discussed during internal meetings. However, you may share publicly-available information such as changes to our mileage programs announced through public press releases.

If you see something on social media that involves Alaska or Horizon and you feel it needs a response, don't handle it yourself. Instead, contact our social media experts by sending a link to [socialcare@alaskaair.onmicrosoft.com](mailto:socialcare@alaskaair.onmicrosoft.com) or Corporate Communications at [newsroom@alaskaair.com](mailto:newsroom@alaskaair.com) or 206-304-0008.

### Conduct that is Not Prohibited

This policy is not intended to preclude or dissuade employees from engaging in legally protected activities, such as discussing or disclosing wages, benefits, or terms and conditions of employment or working conditions of employees; forming, joining or supporting labor unions; bargaining collectively through representatives of their choosing' raising complaints about working conditions; or from engaging in legally required or permitted activities. If you see something on social media that involves Alaska or Horizon and you feel it needs a response, don't handle it yourself. Instead, contact our social media experts by sending a link to [socialcare@alaskaair.onmicrosoft.com](mailto:socialcare@alaskaair.onmicrosoft.com) or Corporate Communications at [newsroom@alaskaair.com](mailto:newsroom@alaskaair.com) or 206-304-0008.

# Protecting our resources

We're proud to have you as part of the Alaska Air Group family of Companies and we want you to be proud to be here. Part of that pride entails doing your job in a way that treats the Companies' assets with respect and ensures that the Companies' priorities are first.

## Handling company property with care

Alaska and Horizon own a wide range of assets that can be categorized into physical and intellectual properties.

**Physical properties** include: computer hardware and software, databases, electronic devices, networks, equipment, real estate, and of course, aircraft. Examples of **intellectual property** include: trademarks, copyrights, and patents.

We ask that you take care of our property and work to prevent damage, misuse, unauthorized access, or theft. These assets are essential to maintaining our competitive advantage. We also ask that for the most part, you use company equipment for company business, not for personal use. Limited use of items like a copy machine or email are okay, as long as the use doesn't distract from your job or end up being a material cost to the Companies. You can't use the Companies' supplies or resources for any outside employment not involving your work with Alaska or Horizon.

Also, be aware that you have no expectation of privacy in any use of the Companies' resources—including in situations involving personal use.

Any intellectual property you create for Alaska or Horizon during work time as part of your job, through use of the Companies' resources, or information you learned through your employment, belongs to the Companies, including ideas, inventions, improvements, computer code, proprietary technology, manuals, trade and service marks, artwork, advertising copy, or any works of authorship.

You may not license, assign, or use intellectual property developed during your employment with us for your own gain or to compete with Alaska or Horizon. You must also treat intellectual property with the same care as other confidential information. Likewise, all intellectual property created by contractors, vendors, or outside consultants engaged by one of the Companies belongs to the applicable Company.

Before starting work with outside consultants, vendors, or contractors, you should make sure agreements are in place that clearly state ownership of the resulting intellectual property.

Our trademarks are vital assets and important components of our brand and identity. All employees, as well as our business partners, should help protect them. To use our trademark, you need to get written permission and clearance from Legal and/or Marketing.

## Handling others' proprietary rights with care

Additionally, we respect the proprietary rights of others. You may not use, copy, distribute, or modify trademarks, copyrighted materials, or any other third party's intellectual property unless you have the prior written consent of the owner. For example, you can't make copies of an article published in a trade publication and distribute it at a meeting.

## Keeping confidential information confidential

When you work for Alaska or Horizon, you may learn and come across information that has yet to be made public. You could see documents or overhear conversations about guest information, employee performance, financial and operational numbers, marketing plans, and more. Depending upon your role, you may also access or use personal information related to our guests or employees. Personal information is highly regulated and any misuse or unauthorized access may result in significant impact to our business. It's important to handle it securely and keep all this information confidential.

Protecting this information is critical to retaining our competitive edge and maintaining our reputation. Our employees are responsible for ensuring this information stays within Alaska and Horizon. You should refrain from talking about the Companies' business where you might be overheard. Don't put things such as important documents or electronics devices in a place where someone can take or see them. The same goes for information that Alaska or Horizon obtained under non-disclosure or other agreements. You should never disclose confidential information, including information personal to our employees, to anyone, internally or outside Alaska or Horizon, unless you are authorized to do so.

In rare circumstances where you need to use email to send confidential information to a third party, be sure to use the encryption "AAG Secure" in the email title.

## Protecting your personal and private information

Alaska or Horizon can access the information you create, send, or store in the Companies' computers, physical files, or other resources. It isn't private. Although it is not routine practice, the Companies can monitor, store, access, and review all email, electronic and physical files, and other information you create or receive using our equipment or on our premises.

We understand that sometimes you may use the Companies' equipment for personal use such as sending a personal email or two. When you do, remember that the information is not private and can be viewed by the Companies, if warranted. Additionally, there may be times when we will disclose such information to law enforcement agencies or to other third parties in our discretion.

*For more information, refer to the following policies: [Intellectual Property and Information Security and Technology Policies](#).*

## Records and information management (RIM)

As an employee you undoubtedly create, send, receive and/or retain documents as part of your normal job responsibilities. The Companies are committed to effective records and information management (RIM) which includes meeting any legal, regulatory, contractual obligations and audit requirements for record retention and privacy protection.

The RIM policy helps employees identify what a “record” is, who is responsible for maintaining that record, how long the record must be maintained, and when the document may be destroyed.

**For more information, refer to the following policy:** [Records & Information Management](#)

## Protecting the environment

We believe environmental responsibility is a natural fit with our values and our guests’ expectations. We strive to integrate sustainable environmental practices into our everyday business. As part of this effort, we reduce our impact on the environment through recycling and energy conservation in equipment and facilities. We ask that you stay familiar with the environmental policies and requirements specific to your job and work location.

**For more information, refer to the:** [AAG Environmental Manual](#)

## Appendix

Author	Summary of Change	Section Title	Revision Publish Date
Managing Director Corporate Affairs & Compliance	Updated to be in compliance with new Policy Standards	All Sections	4/3/20
MD AGC Litigation & Regulatory Law	Added Section	Conduct Not Prohibited, RIM, Staying Safe	4/3/20

