

Southwest Airlines Combating Trafficking in Persons Compliance Plan

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1. Introduction

Southwest Airlines Co. ("**Southwest**" or "**the Company**") is opposed to human trafficking in all forms and is supportive of U.S. Federal Acquisition Regulation 48 CFR 52.222-50 Combating Trafficking in Persons ("**FAR 52.222-50**"). FAR 52.222-50 prohibits U.S. Government contractors and their agents and subcontractors from engaging in any form of trafficking in persons. Southwest's policies, procedures, and practices reflect the Company's strong commitment to anti-human trafficking priorities, and the Company strives to mitigate the risk of human trafficking within the Company's business operations. This Compliance Plan (this "**Plan**") is developed in accordance with FAR 52.222-50.

2. Prohibited Trafficking Activities

48 CFR 52.222-50 prohibits Southwest and its Employees, agents, and subcontractors from:

- (1) Engaging in severe forms of trafficking in persons¹ during the period of performance of a U.S. Government contract;
- (2) Procuring commercial sex acts² during the period of performance of a U.S. Government contract;
- (3) Using forced labor³ during the period of performance of a U.S. Government contract;
- (4) Destroying, concealing, confiscating, or otherwise denying access by an Employee to the Employee's identity or immigration documents, regardless of issuing authority;
- (5) Using misleading or fraudulent practices during the recruitment of Employees or offering of employment, such as failing to disclose, in a format and language understood by the Employee or potential Employee, basic information or making material misrepresentations during the recruitment of Employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if Employer or agent provided or arranged), any significant costs to be charged to the Employee or potential Employee, and, if applicable, the hazardous nature of the work;
- (6) Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- (7) Charging Employees or potential Employees' recruitment fees;
- (8) Failing to provide return transportation or pay for the cost of return transportation upon the end of employment for Employees brought into a country for the purpose of working on a U.S. Government contract or subcontract except for Employees:
 - (i) legally permitted to remain in the country of employment and who choose to do so; or
 - (ii) exempted from the requirement by an authorized official of the contracting agency.

¹ "**Severe forms of trafficking in persons**" means (1) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (2) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

² "**Commercial sex act**" means any sex act on account of which anything of value is given to or received by any person.

³ "**Forced labor**" means knowingly providing or obtaining the labor or services of a person; (1) By threats of serious harm to, or physical restraint against, that person or another person; (2) By means of any scheme, plan or pattern intended to cause the person to believe that, if the person did not perform such labor or services, that person or another person would suffer serious harm or physical restraint; or (3) By means of the abuse or threatened abuse of law or the legal process.

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- (9) Providing or arranging housing that fails to meet the host country housing and safety standards; or
- (10) If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing.⁴

3. Awareness Program

Southwest's policies for Employees, subcontractors, and agents are published on the Company's intranet website and include provisions addressing Southwest's commitment to combating human trafficking. Further, Southwest has issued the [Human Rights Policy Statement](#) available on the Company's intranet website and on the Company's Investor Relations website. Southwest has in collaboration with the [Blue Lightning Initiative](#), also developed internal virtual training programs available to all Employees. Such trainings are mandatory for certain Employee groups, including all Customer-facing Employees. Included in the lavatories of our aircraft are placards advertising the Human Trafficking Hotline, and Southwest Flight Attendants are trained to provide onboard support. Southwest proudly supports multiple nonprofit organizations whose efforts help with the rescue, recovery, and restoration of human trafficking survivors, including, but not limited to [Rescue America](#), [New Friends New Life](#), [Ayuda](#), [It's a Penalty](#), [Polaris](#), [United Against Human Trafficking](#), and [Rethreaded](#).

4. Reporting Mechanism

All Employees, subcontractors, and agents are encouraged to come forward to discuss the topic of human trafficking or a perceived or actual violation at any time. An Employee may report activity inconsistent with the policies prohibiting human trafficking to their Leader. Suspected trafficking activities may also be reported to either (a) the Global Human Trafficking Hotline (1-844-888-FREE; help@befree.org) or (b) the National Human Trafficking Hotline (1-888-373-7888; text "HELP" to 233733). Retaliation against an individual who has reported a violation will not be tolerated.

5. Recruitment and Housing Requirements

If Southwest provides or arranges for housing facilities to Employees, the housing will meet or exceed host country housing and safety standards. Southwest:

- (a) only permits the use of recruitment companies with trained Employees.
- (b) prohibits charging recruitment fees to the Employees or potential Employees; and
- (c) ensures that wages meet applicable host-country legal requirements.

6. Subcontractors and Agents

Southwest requires subcontractors and agents to comply with all applicable local, state, and national government laws and regulations. The requirement to adhere to FAR 52.222-50 is mandatory for all subcontractors and agents who do business with Southwest. Southwest's published [Supplier Code of Conduct](#) further reflects the Company's commitment to ethical business practices.

Southwest Airlines is an Equal Opportunity Employer

⁴ If the Employee must relocate to perform the work, the work document shall be provided to the Employee at least five days prior to the Employee relocating. The Employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.