



# Code of Conduct

## Code of Conduct

### Service Starts with Our Values



#### Southwest Team,

Since our founding, Southwest Airlines has been known for Hospitality and Heart—rooted in our Culture, and our Values. It's reflected in how we treat each other, how we serve our Customers, and how we conduct our business every day—with integrity, honesty, low costs, and an unwavering commitment to Safety.

Our Vision, Values, and Promises guide how we operate and how we live our Purpose: To connect People to what's important in their lives through friendly, reliable, and low-cost air travel. That foundation matters, and it shows up in every decision we make.

Our *Code of Conduct* is a roadmap for doing the right thing. It sets clear expectations for how we show up for one another and how we protect the Company we're all proud to be a part of. Ethics and compliance are non-negotiable at Southwest. Each of us is accountable for understanding and following our policies, and for completing required training.

This document provides resources to help guide you when questions or challenges arise. If you're ever unsure about a situation, speak up. Talk with your Leader. And know that retaliation against anyone who raises a concern is strictly prohibited.

Working together as one Team—with honesty, integrity, and respect, we protect what makes Southwest special. I'm proud of our Company, and I'm proud of each of you.

Thank you for all that you do to serve each other and serve our Customers.

A stylized, handwritten signature in black ink that reads "Bob Jordan".

Bob Jordan  
President & Chief Executive Officer



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# Code of Conduct

At Southwest, we're the airline with Heart, and that means living our Company Values every day. This *Code of Conduct* (*Code*) is here to guide you in making the right decisions and appropriately addressing situations that may arise.

The *Code* explains the Company's expectations for all Employees and Contractors to operate our airline safely, efficiently, and with integrity. It applies to everyone working on behalf of Southwest—full-time, part-time, Interns, and Contractors.

While the *Code* is an important resource, it's not intended to address every situation you may encounter. It doesn't replace your responsibility to know and follow all Company policies, department guidelines, and applicable laws. Policies referenced in this *Code* may provide additional details and are subject to change at any time. If you're unsure about something, check the policy or talk with your Leader. Company policies are available on [SWALife](#).



# 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. We strive to operate our business with an uncompromising commitment to our Purpose, Vision, and Values. We create a welcoming environment for all who interact with us, internally and externally, by focusing on our Company's 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're Committed to **Safety and Security**

## **We comply with all policies, laws, and regulations**

Legislative and regulatory changes can significantly affect how we operate. We're responsible for following all Company policies, as well as applicable federal, state, local, and international laws and regulations.

## **We keep our Cohearts and Customers safe**

Our top priority is a commitment to the Safety and Security of our Customers and each other. By adhering to our [Safety and Security Commitment](#) and other Safety-related policies, laws, and regulations, we proactively identify and manage risks before they become injuries, accidents, or incidents. Employees should report any Safety concerns or violations through the [Safety Reporting System \(SRS\)](#).

## **We maintain a drug-free and alcohol misuse-free work environment**

Maintaining a drug-free and alcohol misuse-free workplace helps manage risk and reduce potential for injury, incidents, or property loss. Southwest complies with all applicable regulations and maintains a drug- and alcohol misuse-free workplace policy that applies to all Employees.

The Southwest Airlines [Drug and Alcohol Policy](#) outlines the rules for all Employees regarding the use, sale, and possession of prohibited substances, as well as alcohol misuse while working. Employees are not permitted to work under the influence or with prohibited substances in their system. Suspected violations of the *Drug and Alcohol Policy* should be reported to a Leader. Drug or alcohol testing may be required when there is reasonable suspicion or cause to believe an Employee is under the influence. Failing or refusing a Company-requested drug or alcohol test will result in termination of employment. Additionally, Employees performing Safety-sensitive duties are subject to DOT-FAA drug and alcohol regulations.

For questions about the *Drug and Alcohol Policy*, Employees should contact their Leader, HR Business Partner (HRBP), and/or the Drug and Alcohol Team.

## **We meet our training commitments**

We uphold Safety by completing all required training and ensuring our training records are accurate and complete. Non-compliance with training requirements or discrepancies in training records may constitute a legal or regulatory violation and can result in serious consequences for both the individual and Southwest Airlines.

## **Resources**

- [Safety and Security Commitment](#)
- [Drug and Alcohol Policy](#)
- [Safety Reporting System \(SRS\)](#)



### **All Employees are expected to:**

- Follow Company policies and procedures.
- Identify anything that could cause damage or injury.
- Report hazards through Companywide reporting tools.
- Know and understand our *Safety and Security Commitment*.



# We Value Each Other

**Southwest Employees are the foundation of our Company, and it's important that we take care of ourselves and each other.**

## **We shape our Culture through inclusion and respect**

Each Employee brings their talents, creativity, and individuality. By fostering inclusion and belonging, we contribute to a Culture where everyone feels welcomed and is treated in an open-minded and fair manner. We treat each other with the same concern, respect, and caring attitude that we offer our Customers.

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

We're expected to act responsibly and maintain a positive working environment that allows every Employee to perform at their maximum potential. This commitment contributes to a healthy organization where everyone thrives, feels appreciated and valued, and has an authentic sense of belonging.

At Southwest, we recognize, respect, and value differences. We don't tolerate discrimination, bullying, retaliation, or harassment. Harassment includes unwelcome conduct—verbal, physical, or otherwise—that makes others feel uncomfortable, interferes with their ability to work, or creates a hostile work environment. For additional information on Southwest Airlines' Bullying and Harassment policies, please refer to [Guidelines for Employees](#).

We have a **zero-tolerance** policy for workplace violence. Violent or threatening behavior is strictly prohibited and may result in disciplinary action, up to and including termination.

Workplace violence includes any words or actions that harm, threaten, or make someone reasonably believe they or others are in danger, whether at work, at Company events, or in situations connected to Southwest Airlines. For additional information on Southwest Airlines' Workplace Violence Prevention policy, refer to the [Guidelines for Employees](#).

Employees are expected to report violations of our policies to a Leader or Employee Relations. Employee Relations will promptly review concerns and conduct a fair and confidential investigation. Retaliation for reporting is strictly prohibited. Employees are expected to cooperate fully in investigations, provide honest information, respond promptly, and maintain confidentiality.



## **Reporting Resources:**

### **SWALife:**

#### [Employee Relations](#)

For any other questions or concerns, or if you're not sure where your question should be directed, email [SWAEthicsandCompliance@wnco.com](mailto:SWAEthicsandCompliance@wnco.com) or submit a report using the [Ethics & Compliance Reporting Form](#).

### **We use social media responsibly**

Employees must use social media responsibly and in a manner that does not reflect negatively on Southwest Airlines. Any content that identifies an Employee as affiliated with Southwest, such as wearing a uniform or referencing employment, may be subject to review.

#### **Prohibited content could include posts that are:**

- Disrespectful, harassing, discriminatory, or threatening
- Sexually explicit or promoting violence or illegal activity
- Misrepresenting or damaging Southwest's reputation
- Disclosing confidential or personal information
- Using Southwest's logos or branding without permission
- Speaking on behalf of the Company without authorization

If you believe a post, comment, or online interaction is inappropriate or concerning, please report it to our Social Media Team. Safety concerns related to social media should be reported immediately to Corporate Security. Visit [Southwest.com](https://www.southwest.com) to provide the details and we will research and respond as soon as possible.

### **We support your ability to work**

If a medical condition or other qualifying circumstance affects your ability to work, leave and accommodation resources are available.

[Leaves of Absence, Workers' Compensation \(OJI\), & Workplace Accommodations](#)

### **We prioritize wellness**

Maintaining mental and emotional health is essential for sustaining personal and professional performance. Southwest is committed to supporting Employees by offering a variety of resources designed to help enhance and preserve emotional wellbeing.

Clear Skies, our Employee Assistance Program (EAP), provides mental health services. Call Clear Skies at (800) 742-8911 or visit [swclearskies.com](https://www.swclearskies.com).

### **Resources**

- [Guidelines for Employees](#)
- [Social Media Policy](#)
- [SWA Clear Skies Where to Go](#)



# We Value Our Company

## We keep our costs low

Our Company policies help maintain our low-cost focus and our financial strength. We're intentional and proactive in identifying opportunities to save and spend wisely in all areas of our operation. Employees are expected to act with ownership and accountability by treating Company resources as our own.

We're committed to spending responsibly and only using Company resources for legitimate business purposes. All purchasing, travel, and expense-related activities should reflect a commitment to value and efficiency, following all financial policies and approval processes.

In addition, we focus on building revenue by supporting initiatives that grow our business and strengthen our brand. We look for opportunities to enhance service, increase efficiency, and elevate the Customer experience. Each of us plays a role in Southwest's financial health and success. By embodying these principles, Employees help ensure Southwest remains a strong and sustainable Company.

## We travel with integrity

Southwest Airlines offers generous Nonrevenue travel privileges to Employees and their Eligible Travelers. These privileges are granted at the Company's discretion and are not guaranteed or contractual. We're expected to use travel privileges responsibly and in accordance with Company policies.

### Key expectations include:

- **Responsible Use:** Travel privileges are for personal leisure only and must not be used for business purposes unrelated to Southwest.
- **Conduct Standards:** Nonrevenue Travelers must maintain professional behavior, follow dress codes, and respect boarding and seating policies. Misuse of travel privileges, including selling passes, manipulating standby lists, or disruptive behavior, may lead to disciplinary action, up to and including termination.
- **Reporting Violations:** Report suspected abuse of travel privileges on [Southwest.com](https://www.southwest.com).



### Mindful Moment: Think Before you Spend!

*Questions to ask before spending and expensing meals, gifts, or teambuilding events:*

Were the expenses incurred in a low-cost manner?

Would the expense appear to be excessive to an outsider looking in?

Would you be comfortable justifying this expense to senior leadership?

If you were to appear on the news participating in a team building event, would you be comfortable explaining the cost?

## We travel and spend responsibly while on Company Business

Southwest Airlines expects Employees to conduct business travel with integrity, professionalism, and fiscal responsibility. Company Business travel must be pre-approved and used only for legitimate business purposes.

### Key expectations include:

- **Travel Approval and Booking:** All business travel must be approved by a Leader and booked through authorized channels. Employees must not purchase revenue tickets for Company Business travel on Southwest Airlines.
- **Etiquette and Conduct:** Employees must be respectful, avoid sensitive discussions in public, and prioritize revenue Customers.
- **Expense Guidelines:** Expenses must be reasonable, necessary, and properly documented. Daily meal limits apply, and certain venues are not reimbursable.
- **Non-reimbursable Items:** Personal expenses, Companion travel, premium upgrades, and entertainment are not eligible for reimbursement.
- **Accountability:** Failure to cancel unused travel, misuse of travel privileges, or submitting inappropriate expenses may result in suspension of travel privileges and/or disciplinary action, including termination.

Employees are expected to be cost-conscious and compliant with all Company Business Travel policies to support Southwest's low-cost Culture and operational excellence.

### Resources

- [Employee Travel Privilege Policies \(ETPP\)](#)
- [Company Business Travel and Expense Policies and Procedures](#)

# We Provide **Legendary Hospitality** to Our Customers

## **We treat our Customers with care, concern, and respect**

Hospitality is at the heart of The Southwest Way. We provide Hospitality in every interaction, whether with Customers, Cohearts, or Business Partners, and follow the Golden Rule by treating others the way we would want to be treated.

At Southwest, Hospitality means creating a warm and welcoming environment that makes People feel valued. It includes greeting others respectfully, actively listening, communicating clearly, and proactively offering help. It also means showing empathy and patience, maintaining a positive attitude in challenging situations, and treating every individual with fairness and respect. For Customers, this ensures a safe and comfortable travel experience; internally, this fosters trust, collaboration, and professionalism.

We act with honesty and integrity, exercising good judgment in the performance of our duties. With the freedom enjoyed at Southwest comes personal responsibility and accountability for our actions. By living these principles, we uphold our reputation, strengthen relationships, and demonstrate The Southwest Way in everything we do.

## **We're dedicated to doing the right thing**

We're dedicated to doing the right thing and take great strides to foster strong relationships with Customers, Suppliers, Business Partners, and communities. We provide transparent policy information at Southwest, including, but not limited to, the [Contract of Carriage](#), [Customer Service Plan](#), and [Tarmac Delay Contingency Plan](#).

## **Resources**

- [Contract of Carriage](#)
- [Customer Service Plan](#)
- [Tarmac Delay Contingency Plan](#)



# We Do Business Fairly, Honestly, and Ethically

## We uphold the highest standards of ethical conduct

We conduct business fairly, honestly, ethically, and in full compliance with all applicable laws, rules, and regulations. Our [Code of Ethics](#) outlines expectations concerning insider trading, competition and fair dealing, payments to government personnel, confidentiality, conflicts of interest, and corporate opportunities. Additionally, the *Code of Ethics* covers protection and proper use of the Company's assets, recordkeeping, reporting illegal or unethical behavior, and compliance procedures.

Employees who suspect or have concerns about any actual or potential violation of the *Code of Ethics*, other Southwest Airlines internal policies, or any laws or regulations should promptly address the matter with their Leader. If that's not possible or doesn't resolve the issue, Employees must submit a report (anonymous option available) to Southwest's Chief Legal Officer (or equivalent) using the [Ethics & Compliance Reporting form](#), or by emailing [SWAEthicsandCompliance@wnco.com](mailto:SWAEthicsandCompliance@wnco.com). For any other questions or concerns, please email [SWAEthicsandCompliance@wnco.com](mailto:SWAEthicsandCompliance@wnco.com).

Southwest Airlines prohibits retaliation for reports made in good faith.

## We act with integrity and avoid conflicts of interest

We conduct business ethically, honestly, transparently, and with sound judgment by maintaining accurate records and reporting systems at all times. Falsifying records or misrepresenting information may result in legal consequences for both the Company and individuals involved.

We comply with all applicable laws and Company policies, including those related to conflicts of interest.

## We don't participate in insider trading

Employees must not buy, sell, or otherwise trade Southwest Airlines stock or encourage others to do so based on material nonpublic information. Sharing confidential information for the purpose of trading securities is strictly prohibited and may lead to termination, fines, or criminal charges.

Depending on the role, trading windows or blackout periods may apply.

**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 or 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.*



A conflict of interest arises when an Employee or Board Member, or a member of their family, receives improper personal benefits as a result of their position. Any activity or business that could create, or appear to create, a conflict of interest for you or the Company should be avoided. Additionally, you may not represent Southwest in any interaction or transaction where you or an immediate family member has a substantial interest or financial tie. Situations involving conflicts of interest may not always be clear-cut. If you have a question, refer to the Code of Ethics or contact the Legal Department.

## **We compete fairly**

We compete with integrity, winning Customers through low fares, low costs, and exceptional service. We follow all antitrust laws at the local, state, and federal levels and avoid discussions with competitors about confidential or nonpublic business information. We must never make agreements with competitors or suppliers—formal or informal—that could appear improper.

Violating these rules may lead to serious legal consequences for both the Company and individuals involved.

## **We engage respectfully in political and government activities**

Employees have the right to vote and be involved in political and civic matters on their own time. Political activities that are not Company-sponsored—such as circulating petitions, soliciting votes or donations, or wearing political symbols—aren't allowed while on duty or on Company property.

Employees who choose to run for public office must avoid conflicts of interest and keep campaigning outside of work; Company resources may not be used for personal political activities. Additional rules apply for Employees serving in elected roles. For additional information on Southwest Airlines' Political Activities policy, please refer to the [Guidelines for Employees](#).

To protect Employees' integrity and Southwest's reputation, we have strict rules about working with government officials. Employees may not offer or give anything of value to government officials or their staff to influence decisions or show appreciation. This includes upgrades, waived fees, and promotional items. Bribery in any form is strictly prohibited.

Questions regarding what's allowed should be directed to [Governmental Affairs](#) for guidance.

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

Southwest engages with policymakers, trade associations, and business leaders to promote a strong, competitive airline industry. We're committed to transparency, integrity, and compliance in every interaction with public officials. Our Governmental Affairs Team leads this work at the local, state, and federal levels, ensuring our voice is heard on key regulatory and legislative issues.

We participate in industry groups like Airlines for America (A4A) to stay informed and aligned on matters that impact our business and Customers.

We also support political engagement through the Southwest Airlines Co. Freedom Fund ("Freedom Fund"), our Employee-funded political action committee. 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. Contributions are voluntary, reviewed through a structured process, and disclosed in compliance with all applicable campaign finance laws.

All lobbying and advocacy efforts are conducted in full accordance with federal, state, and local laws.

## **Resources**

- [Guidelines for Employees](#)
- [Code of Ethics](#)
- [Investor Relations](#)
- [Corporate Citizenship](#)
- [Insider Trading Policy](#)
- [Supplier Code of Conduct](#)
- [Procurement Policy for Employees](#)

# We Protect What Matters – Our People, Our Brand, and Our Information

## We protect personal information

Protecting our assets isn't just about technology; it's about trust. Whether it's personal information, our reputation, or the systems we rely on, every Employee plays a part in keeping data safe. Employees should only access or share personal data if it's part of their job and must follow our privacy policies. For additional guidance, contact the [Privacy Office](#) before taking action.

## We protect Southwest's reputation

We value our reputation as an airline with Heart. Employees may not speak on behalf of Southwest or share anything that could be seen as harmful, offensive, or disrespectful. Media inquiries must be directed to the External Communications Team at [SWAMedia@wnco.com](mailto:SWAMedia@wnco.com).

## We safeguard our systems and data

Employees are expected to follow our Cybersecurity policies and best practices outlined in the [Information Security Policy](#) and [Guidelines for Employees](#).

- Keep login credentials private and use strong passwords.
- Stay alert to phishing attempts and report suspicious emails using the tools provided.
- Keep software up to date and connect to the Southwest network through VPN when working remotely.
- Complete Cybersecurity Awareness Training each year.
- Suspicious activity, a data breach, or anything that doesn't seem right should be reported to the Cybersecurity Team 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.

## We collaborate with care

Treat collaboration tools (Microsoft Teams, Viva Engage, etc.) as extensions of our workplace. Keep conversations respectful, avoid sharing confidential information unless authorized, and follow guidelines for naming, storing, and sharing files. External collaboration on any of these platforms must be approved and secure.

## We use AI responsibly

Southwest supports the use of Artificial Intelligence (AI) to improve how we work, but only when it's done safely, ethically, and in line with the [Artificial Intelligence \(AI\) Acceptable Use Policy](#).

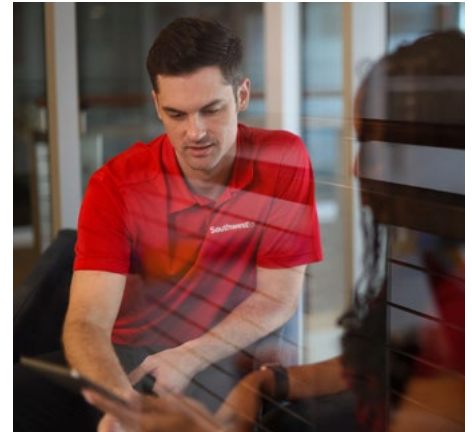
AI tools may only be used if they have been reviewed and approved by Southwest. Never input confidential, personal, or proprietary information into public or unapproved AI platforms. Employees must review all AI-generated content for accuracy before use.

Using AI in ways that expose sensitive data, create biased or misleading content, or violate Company policies is strictly prohibited.

For a list of approved AI tools and other resources, check Southwest's AI SharePoint page or contact [southwestai@wnco.com](mailto:southwestai@wnco.com).

## Resources

- [Privacy Policy](#)
- [Southwest Airlines Privacy Standard](#)
- [Guidelines for Employees](#)
- [Information Security Policy](#)
- [Artificial Intelligence \(AI\) Acceptable Use Policy](#)





# We're Good Global Citizens

## We care for our communities and our planet

We put our Heart into action by caring for People, engaging with our communities, protecting the planet, and doing our part to make the world a better place.

## We give back with Heart

Service is at the core of who we are. We show up for each other and for the communities we serve.

Southwest develops programs that support communities and works with business, civic, and community leaders to build trust and foster meaningful relationships. Employees are encouraged to get involved through volunteer opportunities and to log hours with eligible nonprofits through our [Tickets for Time \(T4T\)](#) program. Our efforts help those organizations earn flight awards and make a bigger impact.



Southwest Airlines cultivates relationships with local and national organizations to generate impact across our communities. We strive to support our communities during times of crisis by partnering with national and local organizations for preparedness, response, and resiliency services.

## We respect our planet

Caring for the environment is part of how we show our Heart. Our long-term environmental goals require an integrated approach across several important initiatives: operational efficiency, fleet modernization, and advocacy for air traffic control modernization and other NextGen Federal Aviation Administration initiatives. We can all contribute by staying informed, making environmentally conscious choices, and supporting our sustainability goals in our daily work.

## We protect and respect human rights

At Southwest Airlines, protecting human rights is a shared responsibility. We're committed to creating an environment where people feel safe and respected, consistent with our [Human Rights Policy Statement](#). We uphold these standards in everything we do. We provide training and resources on key topics like harassment, discrimination, accommodations, and human trafficking.

Maintaining a respectful workplace means treating others with dignity, following our policies, and reporting concerning activity. Employees should direct any questions or concerns to their Leader.

## Resources

- [Tickets for Time T4T](#) [SWA Volunteerism Incentive Policy](#)
- [Human Rights Policy Statement](#)
- [Combating Trafficking in Persons Compliance Plan](#)
- [Harassment, Sexual Harassment, Discrimination, & Retaliation Policy](#)