



Vendor Code of Conduct

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Overview

With the largest regional airline operations in the United States, SkyWest remains committed to, and takes great pride in caring for our companies' customers, communities, and our environment. Our companies' vendors provide functions cross the SkyWest network and we rely on them to be safe, ethical, and to help us achieve our business goals. SkyWest will not willingly establish or maintain a business relationship whose employment practices do not align with Equal Employment Opportunity (EEO) compliance. SkyWest maintains an Affirmative Action Plan, including active employment of minorities, women, veterans, and individuals with disabilities. SkyWest makes positive contributions to the communities we serve and requires our vendors to do the same. This Vendor Code of Conduct describes SkyWest expectations of Vendors.

Compliance by Vendors

Vendors, their employees, and sub-contractors must comply with the Code and any applicable laws in the jurisdiction where the Vendor conducts business with, or on behalf of, SkyWest. Vendors are required to self-monitor compliance with this Code and be able to demonstrate and validate their compliance upon request. SkyWest may audit Suppliers or inspect their facilities to ensure compliance.

Labor Practices

- Vendors must not discriminate against employees with regard to hiring or terms and conditions of employment regardless of race, color, national ancestry, sex, sexual orientation, gender identity, marital status, national origin, religion, medical condition, disability, pregnancy, age or military status.
- Vendors must comply with minimum working age laws
- Vendors must pay at least the legally-required minimum wage and provide all legally mandated benefits relevant to where work is performed
- Vendors must abide by the maximum legally allowed number of working hours and overtime. Mandatory overtime must not impair the health or safety of employees and adequate rest periods must be provided.
- Vendors must respect their employees' freedom of association and their right to engage in, or refrain from, collective bargaining.
- Employees must be engaged on a voluntary basis without force or threat.

Human Rights

Vendors must conduct business in a manner that respects the human rights and dignity of all people and does not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labor, forced or compulsory labor, non-discrimination and human rights, employment conditions, ethical behavior, or any other human rights abuses. Vendors must support laws enacted to prevent and punish the crimes against human rights, including laws enacted to prevent and punish the crime of sexual exploitation of children, and to build awareness amongst its employees.

Safety and Health

- Vendors must ensure a safe and violence free working environment and comply with all applicable health and safety laws, reporting requirements, training, and promoting safety. Vendors must establish procedures, programs and systems to manage, track, and report occupational injury and illness.

- Vendor facilities must have adequate fire safety, disaster, and other emergency precautions and must provide adequate heating, air conditioning, ventilation, emergency exit, first aid supplies, restrooms, and break room facilities.
- Vendors must prohibit the possession, use, or distribution of illicit drugs and alcohol when on the premises of, or performing duties for, SkyWest.

Business Practices

- Vendors must comply in all material respects with laws, rules and regulations of national, state, provincial and local governments and their agencies that affect the conduct of the Vendors business and financial reporting.
- Vendors must create accurate financial statement and keep business records including invoices, payment receipts, and shipping documentation that are in accordance with accepted accounting principles of the jurisdictions in which they operate.
- Vendors may only use software, hardware, and content that is legitimately acquired, and must comply with all respects with applicable license terms.
- Vendors are prohibited from purchasing or selling any type of security while in possession of material, non-public information.
- Vendors may not offer, or allow their employees to offer, gifts of any item of value if the gift is intended or may be perceived as an effort to influence SkyWest business decisions. No gift may be offered or accepted if a feeling of obligation, a compromise in judgment, or an improper influence on the recipient is created.
- Vendors may not offer, or allow their employees to offer, anything of value to influence a foreign official, including any employee of an entity owned entirely or in part by a foreign nation.
- Vendors must treat all information acquired in the scope of providing services to SkyWest as confidential and may not use it for any other purpose.
- Vendors must respect the privacy of SkyWest customers, employees, and any other individuals who provide personal information to SkyWest. Disclosure of information is made only in accordance with applicable law and only with the specific approval of SkyWest.

Corporate Social Responsibility

- Vendors must comply with all environmental laws in the applicable jurisdictions in which they operate.
- Vendors must have policies and programs designed to lessen their environmental impact, reduce waste, and foster social and economic development of the communities in which they operate.
- Vendors must employ fair and ethical practices in the engagement of its suppliers and must proactively seek to engage competitive and diverse suppliers.

Reporting

Vendors, their employees, and sub-contractors are encouraged to report situations where there is possible conduct that is not in keeping with the law or this Code. Vendors must report known findings of non-compliance related to work performed for SkyWest companies. This can be done by phoning the toll-free Ethics and Grievance Hotline at 888.273.9994 or reporting online at www.reportlineweb.com/SkyWestAirlines.