

Southwest Airlines Policy Concerning Harassment, Sexual Harassment, Discrimination & Retaliation

Effective: 01/01/2019

Issued by Southwest Airlines January 2019; Effective Until/Unless Reissued

Southwest Airlines prohibits any and all types of harassment, sexual harassment, discrimination, and/or retaliation against Employees by Leaders, fellow Employees, or third parties. Harassment or discrimination based on race, color, ancestry, religion, age, sex, sexual orientation, gender, gender expression, gender identity, pregnancy, marital status, national origin, physical or mental disability, military or veteran status, genetic information, medical condition, or any other legally protected status, negatively affects morale, motivation, and job performance. Such behavior is inappropriate, offensive, and will not be tolerated.

EXAMPLES OF TYPES OF DEROGATORY, SEXUALLY SUGGESTIVE, OFFENSIVE, THREATENING, INTIMIDATING, HOSTILE, OR RETALIATORY CONDUCT THAT ARE PROHIBITED INCLUDE BUT ARE NOT LIMITED TO:

- verbal comments, including voicemail or recorded statements;
- written comments including, email, text messages, or social media online posts;
- unwanted physical behavior including pats, squeezes, deliberate brushing against someone's body, impeding/blocking normal work or movement, or unwanted sexual advances;
- displaying or forwarding messages, photos, graffiti, pictures, cartoons, drawings, social media posts, online comments, symbols, or logos including displaying such content at one's own work area, computer, or mobile device;
- epithets or slurs are always offensive and will not be tolerated for any reason, even if an Employee mistakenly believes such epithets to be a funny part of a joke or prank; and
- basing or threatening to base any employment decision (such as an Employee's performance evaluations, work assignments, or advancement) upon an Employee's submission to harassing behavior.

REPORTING & INVESTIGATIONS

Employees, including Leaders, have a duty to promptly and accurately report any actual, threatened, or perceived incidents of harassment, sexual harassment, discrimination, or retaliation to their Supervisor, Manager, Director, Vice President, or the Employee Relations Team. Leaders who themselves observe or who are made aware of harassment, sexual harassment, discrimination, or retaliation concerns or complaints should immediately contact Employee Relations in the General Counsel Department at HDQ.

All complaints should be referred to Employee Relations, the Team designated by Southwest Airlines to conduct, document and track all investigations under this Policy. Employee Relations will investigate all referred complaints promptly, impartially, and discreetly.

- Employees are encouraged to participate in investigations and are expected to refrain from discussing the investigation with other Employees.
- Upon completion of an investigation, the appropriate parties will be notified that the investigation is completed.
- Information obtained by Southwest Airlines through the complaint/investigation process will generally be treated confidentially except for what is required to properly investigate complaints, take appropriate responsive actions, or as otherwise required by law or business necessity.
- Any Employee who has been found to have acted inappropriately against another Employee in violation of this policy will be subject to appropriate corrective action up to and including termination.
- If after investigating a complaint Southwest Airlines determines that the complaint was not made in good faith or that an Employee has provided false information, appropriate corrective action up to and including termination may be taken.

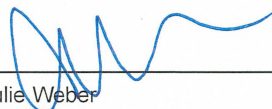
RETALIATION IS PROHIBITED

Retaliation typically involves adverse actions against an individual engaging in protected activity. Protected activity involves an Employee asserting his/her right to be free from employment discrimination and/or harassment. Examples include making a complaint under this policy and/or participating in an investigation under this policy. Negative comments (verbal or written), negative behavior, or adverse employment actions toward someone because he/she has engaged in protected activity is strictly prohibited.

It is expected that Employees of Southwest Airlines will act responsibly to maintain a positive working environment, free of harassment, sexual harassment, discrimination, and retaliation, and free of hostile, threatening, or intimidating behavior, allowing each Employee to perform at his/her maximum potential. Southwest Airlines encourages any Employee to bring any questions regarding harassment, sexual harassment, discrimination, or retaliation to his/her Leaders or to the Employee Relations Team.



Gary C. Kelly
Chairman of the Board & Chief Executive Officer



Julie Weber
Vice President and Chief People Officer