



## **JetBlue Airways Corporation**

### **Annual Report Pursuant to the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the 2023 Fiscal Year**

#### **Introductory Statement**

JetBlue Airways Corporation's ("JetBlue" or the "Company") values – Safety, Caring, Integrity, Passion and Fun – are embedded in its culture. The Company's long-term success depends on its adherence to those values, its integrity and its commitment to legal ethical, safe, fair and responsible business practices.

JetBlue is deeply committed to fighting against forced labour and child labour, including modern slavery and human trafficking.

This report is made pursuant to section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") and constitutes JetBlue's annual report for its fiscal year ending December 31, 2023.

#### **a. Activities, Structure and Supply Chains**

##### **Activities**

JetBlue is a U.S. scheduled passenger airline incorporated in Delaware and based in New York City. It is the sixth largest airline in the U.S., operating an average of over 900 flights daily and carrying over 40 million passengers a year. With over 24,000 staff members ("crewmembers"), JetBlue serves over 100 destinations in the U.S., Canada, the Caribbean, Latin America and Europe. Its "focus cities" (where it has large operations) are Boston, Fort Lauderdale-Hollywood, Los Angeles, New York, Orlando and San Juan.

##### **Structure**

JetBlue is a public U.S. corporation, organized in the state of Delaware, whose shares of stock are traded on the NASDAQ Stock Exchange in New York City. No one shareholder owns a controlling interest in the Company. JetBlue Ventures and JetBlue Travel Products are two of the Company's non-airline and wholly-owned subsidiaries. JetBlue Ventures invests in and partners with early-stage start-ups improving the travel, hospitality and transportation industries. JetBlue Travel Products offers package travel deals (e.g., air, hotel and car) and hosts websites (e.g., Paisly) that assist travellers with non-airline products (e.g., hotels). JetBlue also has its own wholly-owned charitable arm (the JetBlue Foundation), crewmember support fund (the JetBlue Crewmember Crisis Fund), political action committee (JetBlue Airways Corporation Crewmember Good Government Fund) and captive insurance company (Blue Bermuda Insurance Ltd.). All of the aforementioned, with the exception of the latter (which is based in Bermuda), are located in the U.S. None of these subsidiaries sell or import goods into Canada.

##### **Supply Chains**

JetBlue's success is built on its values and ethical conduct. The Company's commitment to its role in eradicating forced labour, child labour, modern slavery and human trafficking also stretches out to its supply chain. JetBlue's main business partners include suppliers of aircraft, aircraft engines, aircraft parts, aviation fuel, ground handling services, inflight catering, information systems, aircraft maintenance and repair services, professional services, travel and real estate. These business partners are located within and outside of the Company's home country of the United States, including the various foreign countries and regions to which



it flies, as well as any countries in which any goods consumed by JetBlue are made (whether by direct suppliers or entities supplying the Company's Business Partners (as defined below)).

## **b. Policies and Due Diligence Processes**

JetBlue strives to work with Business Partners that share the Company's commitment to ethical business practices.

The Company's contract templates also include anti-trafficking clauses and language incorporating the provisions of the JetBlue Business Partner Code of Conduct, which JetBlue also seeks to incorporate into contracts when using Business Partner templates (although many have their own versions of such provisions).

### **Policies**

JetBlue's undertakings in respect to forced labour and child labour (as well as modern slavery and human trafficking) are set out in:

- JetBlue Code of Conduct – The JetBlue Code of Conduct (the "JetBlue Code") is a key master document outlining the business, personal, and professional standards that must be followed by all JetBlue crewmembers and anyone conducting business on behalf of JetBlue. It reinforces JetBlue's values.

Specifically, the JetBlue Code contains a section on Human Rights & Labour Practices, including the Company's commitment to the efforts in identifying and reporting human trafficking. With respect to child labour, the JetBlue Code states that the Company and its Business Partners shall adhere to the minimum employment age limit defined by national laws and regulations, and comply with relevant International Labour Organization (ILO) standards, and must ensure that hours and tasks performed by these individuals does not hamper their education, health, safety, and mental or physical development. Business Partners shall ensure that no underage labour has been used in the production and/or distribution of their goods.

In addition, the JetBlue Code provides that JetBlue and its Business Partners must not engage in or support any form of slavery, forced or compulsory, bonded, prison, indentured labour, or human trafficking of involuntary labour through threat, force, fraudulent claims, or coercion. JetBlue fully complies with the requirements of applicable slavery, forced labour, and human trafficking laws.

- JetBlue Business Partner Code of Conduct – JetBlue's Business Partner Code of Conduct ("BP Code") describes JetBlue's expectations of how its Business Partners should operate. Business Partners, their workers, agents, and subcontractors (collectively referred to as "Business Partners") are expected to adhere to the BP Code while conducting business with or on behalf of JetBlue. This includes aligning and integrating guidelines, policies, and practices with the BP Code and communicating and enforcing the BP Code throughout their organization and across their supply chain.

The BP Code contains provisions relating to Human Rights and Labour Practices. According to the BP Code, respecting human rights means treating people with dignity. JetBlue recognizes its responsibility to respect internationally recognized human rights and labour standards, including the Universal Declaration of Human Rights and the International Labour Organization's Core Conventions. The Company expects its



Business Partners to enact similar policies and practices covering the following topics that apply to their workers and business relationships, including contract workers:

a. Freely Chosen Employment

Business Partners must not engage in or support any form of slavery, forced or compulsory, bonded, prison, indentured labour, or human trafficking of involuntary labour through threat, force, fraudulent claims, or coercion. Business Partners must also not permit their subcontractors to engage in these practices. JetBlue expects its Business Partners to fully comply with the requirements of applicable slavery, forced labour, and human trafficking laws.

JetBlue requires its Business Partners to be aware of the indicators of forced labour identified by the International Labour Organization, such as the withholding of wages, retention of identity documents, and restriction of movement. Business Partners must also implement measures to ensure that workers are not exploited by third-party labour providers, such as recruiters or agencies. Such measures include, but are not limited to, caps on or elimination of recruitment fees, provision of contracts to all workers in their native language or other language that they are able to understand, and elimination of deposits paid by workers to vendors or recruiters to secure jobs.

Business Partners are encouraged to implement due diligence measures to ensure that no human trafficking exists within their extended supply chains.

b. Child Labour

Business Partners must not employ child labour in the manufacturing or in the provision of services or supply of goods. The term “child” refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is higher. JetBlue only supports the development of legitimate workplace apprenticeship programs for the educational benefit of young people and will not do business with those who abuse such systems. Workers under the age of 18 shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime.

In addition, Business Partners should take the necessary preventive measures to ensure that they do not employ anyone under the applicable legal minimum age of employment. Examples of preventive measures include, but are not limited to, age verification systems, training for managers, and communicating with suppliers about child labour issues.

## **Due Diligence**

With respect to due diligence, the Company’s due diligence questionnaire does not currently have specific questions regarding forced labour or child labour. In the absence of the Business Partner having its own code of conduct, however, JetBlue asks such Business Partners to agree to comply with the BP Code. Essentially, the Company requires its Business Partners to embed responsible business conduct through the aforementioned contractual provisions



and the BP Code. In addition, JetBlue is currently reviewing the OECD Due Diligence Guidance for Responsible Business Conduct to ascertain whether it should add anything to its standard due diligence questionnaire to specifically address forced labour and/or child labour.

### **c. Forced Labour and Child Labour Risks**

As to the assessment of risk, JetBlue considers the risk of forced labour and child labour within the ranks of its directly hired crewmembers to be low, given the policies, training, monitoring and controls in place (as well as protections under applicable laws). JetBlue does, however utilize outsourced labour in the countries outside of the U.S. to which it flies, which may involve some risk. As with all international airlines, there is also risk that third parties may use the company's flights for "human trafficking" / "modern slavery". Training with respect to this last point is more fully described below. The Company is still assessing other areas of potential risk of forced labour and child labour, particularly within its supply chains.

With respect to the Company's supply chain, it has the robust BP Code as more fully detailed above and which it incorporates by reference into Business Partner contracts.

### **d. Remediation Measures**

JetBlue has not currently identified any forced labour or child labour in its activities and supply chains. Nonetheless, with respect to its own activities, the Company participates in the Blue Lightning Initiative noted below (where "forced labor" is considered a form of "human trafficking"). JetBlue has adopted the JetBlue Code and the BP Code described above, as well as the incorporation of the latter code's provisions into supplier contracts. In addition, over the next year, JetBlue will review the United Nations Guiding Principles on Business and Human Rights to ascertain whether there are additional steps the Company should take.

### **e. Remediation of Loss of Income of Vulnerable Families Resulting from Measures Taken to Eliminate Forced Labour and Child Labour**

JetBlue does not currently have any such measures and has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities and supply chains.

### **f. Training**

In May 2013, JetBlue was one of the first domestic U.S. airlines to sign on to the U.S. Department of Homeland Security's and U.S. Department of Transportation's Blue Lightning Initiative, which trains airlines across the U.S. and their personnel to identify potential human trafficking and report it to the relevant authorities. A training preview of this Initiative says that "human trafficking" includes "forced labor". This program, however, is designed to protect air passengers, as opposed to supply chain risks, but participation still drives awareness among the Company's crewmembers. The Company teaches its crewmembers what human trafficking is, who the victims typically are, what signs to look for and how to report information of suspected human trafficking.

Initial and recurrent training on modern slavery and human trafficking is provided to all crewmembers in direct contact with customers (e.g., pilots, flight attendants and airport customer support agents). Other JetBlue crewmembers also have access to this training as an elective course in their JetBlue University course catalogues.



JetBlue's training program includes: (i) an introduction to the Blue Campaign (a campaign launched by the U.S. Department of Homeland Security to raise awareness of human trafficking indicators and how to respond to them) and the Blue Lightning Initiative, (ii) definitions of human trafficking (which includes the use of force or coercion to exploit someone for labour) and human smuggling, (iii) indicators of human trafficking, and (iv) protocols for reporting suspicions. Customer-facing crewmembers are therefore provided with information on the warning signs and indicators of human trafficking and reporting requirements. In addition, human trafficking guidance is incorporated in relevant department manuals (including for pilots, flight attendants and airports crewmembers), which are available on JetBlue's internal online platform Comply365. Further training opportunities and instructional videos provided by the Blue Lightning Initiative are made available to staff.

Training materials are regularly reviewed and updated as necessary, including to address any changes suggested by the U.S. Department of Homeland Security, U.S. Department of Transportation or the Blue Campaign.

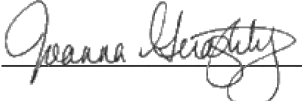
#### **g. Assessing Effectiveness**

Although JetBlue does not currently have any methods of assessing effectiveness, it plans to look at this issue over the next year.

#### **ATTESTATION**

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in this Annual Report for the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this Annual Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. This Annual Report was approved by JetBlue's Board of Directors on September 12, 2024, as required by paragraph 4(a) of the Act.

Joanna Geraghty  
Chief Executive Officer and Member of the Board of Directors  
November 7, 2024

Signature:  I have the authority to bind JetBlue Airways Corporation