

## Policy on Political Contributions and Engagement

At Alaska Air Group, Inc. (the “Company”) we strive to connect our guests to the world with a remarkable travel experience rooted in safety, care and performance. Alaska Airlines, Hawaiian Airlines and Horizon Air together serve more than 140 destinations across the United States and approximately 30 international markets, providing essential air service for our guests along with moving crucial cargo shipments, such as food, medicine, mail and e-commerce deliveries. With hubs in Seattle; Honolulu, San Francisco; Los Angeles; Portland, Oregon; San Diego; and Anchorage, Alaska, along with operations across the country, the policy decisions of federal, state and local governments impact Alaska Air Group, Inc. and the Company’s stakeholders. This includes changes to existing law, new laws, and new policy initiatives affecting not only the business directly, but our employees, retirees and the communities we serve, as well as our shareholders. Accordingly, Alaska Air Group, Inc. believes that it is appropriate and necessary to participate and engage in the policy making and political processes at the international, as well as U.S. federal, state, and local levels.

Our success depends on our ability to provide safe air transportation, develop relationships with guests by providing exceptional customer service and low fares, and maintain a low-cost structure to compete effectively. We strive to achieve our objectives as a socially responsible company that values not only performance but also our people, the communities we serve, and the environment. Public policy affects our ability to accomplish these goals, meet customer needs, and provide shareholder value. As a highly regulated entity, it is in the best interests of our key stakeholders, including employees, guests and shareholders, for the Company to advocate for policies in support of our business and a strong, competitive industry. This includes direct advocacy, indirect advocacy through participation in trade associations, public communications and media efforts, and making political contributions where appropriate and permitted by law.

Alaska Air Group, Inc. takes our role as a good corporate citizen seriously and complies with all international, federal, state and local laws and requirements associated with political engagement. This Policy specifically addresses the Company’s political engagement in the United States, including at the state and local levels. All political contributions made by the Company’s Political Action Committee (Alaska Air Group, Inc. Political Action Committee) or the Company must: (i) comply with all applicable laws and regulations in the jurisdictions in which the contributions are made; and (ii) adhere to this Policy and the [Alaska Air Group Companies Code of Conduct and Ethics](#).

Any political contribution made by the Company must be approved by the Company’s General Counsel, Senior Vice President Public Affairs and Sustainability, or a designee. All political contributions must reflect the Company’s interests and not those of its individual officers or directors. No political contribution will be given or offered in anticipation or recognition of, or in exchange for, an official act.

In making the decision to approve a political contribution to a candidate, the Company’s General Counsel, Senior Vice President Public Affairs and Sustainability, or designees shall consider the following factors: (i) the candidate’s qualifications; (ii) the candidate’s voting record and views on policies and issues important to the Company; (iii) whether the candidate represents a geographic area where the Company has a major business presence, holds a leadership position, or serves on

a committee with jurisdiction over policies and regulations important to the Company; and (iv) the financial impact and electoral importance of making a contribution.

The Company's Board of Directors has adopted this Policy on Political Contributions and Engagement to ensure that any such contributions are made in a manner consistent with the Company's purpose and/or shareholder interests.

We intend to publish a list of contributions twice annually on the Company's website, and to update this Policy as appropriate.

### **Corporate Contributions to Candidates, Committees, Political Organizations & Ballot Measures**

Consistent with federal campaign finance laws, the Company does not make corporate political contributions to federal candidates, political parties, or political committees. However, some state and local jurisdictions permit companies to contribute to state and local candidates, political parties, referenda and ballot initiatives. Political contributions at the state and local levels may be made directly by the company or the Company's Political Action Committee ("PAC"), to the extent permitted by applicable state and local laws.

The budget for corporate political contributions is determined annually by the Senior Vice President Public Affairs and Sustainability, in consultation, as appropriate, with the Company's Chief Executive Officer and legal counsel to ensure compliance with corporate policy and applicable federal, state and local laws.

The Alaska Air Group, Inc. Governance and Nominating Committee of the Board of Directors receives semi-annual briefings on corporate-wide political spending.

[Click here](#) for a list of the Company's 2024 political contributions to U.S. state and local candidates, political committees and political organizations and in regards to ballot measures. The Company does not make independent expenditures or electioneering communications, as such terms are defined in the Federal Election Campaign Act or applicable Federal Election Commission ("FEC") regulations. Prior year reports back to 2019 are available for download. Starting in 2025 reports will be inclusive of any expenditures made by Hawaiian Airlines as a new subsidiary of Alaska Air Group.

### **Alaska Air Group, Inc. Political Action Committee**

With regards to federal contributions, the Company has established a non-partisan separate segregated fund or PAC. The Alaska Air Group, Inc. Political Action Committee ("AAG PAC") is registered with the FEC. AAG PAC is non-partisan and organized on a strictly voluntary basis. Only eligible employees are asked to consider supporting AAG PAC.

AAG PAC's political contributions are reported monthly to the FEC. To find detailed information about AAG PAC contributions visit the FEC's website at <http://www.fec.gov>.

The AAG PAC is overseen by the five person AAG PAC Board of Directors ("AAG PAC Board"). The AAG PAC Board is briefed and consulted on all contributions on a quarterly basis. The AAG PAC Treasurer is registered with the FEC and, along with the Senior Vice President Public Affairs and

Sustainability (who is an AAG PAC Board Member), oversees the administration of AAG PAC. The Company Chief Executive Officer also serves as an AAG PAC Board Member. All checks drawn from the AAG PAC account must be approved by two sitting AAG PAC Board Members. Additionally, AAG PAC has implemented internal and external controls to ensure it is properly managed and complies with all federally mandated contribution limits and restrictions.

The Alaska Air Group, Inc. Governance and Nominating Committee of the Board of Directors receives semi-annual briefings on AAG PAC contributions.

For a list of all the AAG PAC 2024 contributions [click here](#). Prior year reports back to 2019 are available for download. For years prior to 2019 information is available on the FEC website: <http://www.fec.gov>.

### **Trade Associations**

Alaska Air Group, Inc. participates in and pays annual dues to trade and industry associations, such as Airlines for America (“A4A”), the Regional Airline Association (“RAA”) and the United States Chamber of Commerce. Our involvement with these organizations allows us to promote the airline industry, gain insight into key issues for our business, and to advocate alongside our peer companies for government policies that support an efficient, safe, competitive, and responsible air transportation industry and business environment.

Our participation in A4A and RAA also allows us to benefit from the opportunity to share technical expertise and operational knowledge in support of safety, an improved customer experience, environmental protection, and overall efficiency.

The Company is also a member of other associations and various chambers of commerce and similar organizations at the international, federal, state and local levels which may engage in public advocacy. The Company’s participation in trade associations may be subject to reporting under applicable lobbying laws – for example, the Company reports certain payments to trade associations as “lobbying expenses” on the Company’s federal quarterly lobbying reports. The Company is committed to complying with all applicable lobbying laws and to reporting trade association activities, donations, and membership as required by such laws. Participation as a member of a trade association comes with the understanding that we may not always agree with all of the positions of the organizations or other members. However, we believe that the associations take positions and address issues in a collective industry manner and often advance positions consistent with the interests of the Company and other key stakeholders.

The Company’s Senior Vice President Public Affairs and Sustainability and Government Affairs Department is responsible for oversight of the Company’s participation in trade associations. In this capacity the Senior Vice President shall annually review the Company’s participation in trade associations and other public advocacy efforts, and shall review and discuss the same with Company management.

For a list of Alaska Air Group, Inc.’s 2024 payments to trade associations for which the Company paid dues or payments of more than \$25,000 and who spend 10 percent or more of their revenues lobbying [click here](#).

## **Voluntary Political Participation by Employees**

Alaska Air Group, Inc. values the right of employees to voluntarily participate in the political process, such as through personal contributions or by volunteering their personal time to candidate or organizations of their choice. These activities, however, must not suggest the Company's support and must not involve any unlawful use of the Company's resources.

The Company will not reimburse employees in any way for personal political contributions, including but not limited to political contributions to the AAG PAC. Moreover, the Company will not pressure or coerce employees to make personal political contributions and will not favor or disfavor any employee by reason of the amount of their political contribution or decision not to make a political contribution.

The Company expects all officers and employees to comply with applicable federal campaign finance laws.

## **Lobbying**

Alaska Air Group, Inc. engages in lobbying in the United States at the U.S. federal, state, and local levels. The Company has a Government Affairs Department comprised of government affairs professionals who consult with and are assisted by subject-matter experts within and external to the Company. These employees and contracted lobbyists with the Company engage in lobbying activities and advocate on behalf of Alaska Air Group, Inc.

All expenditures associated with Alaska Air Group, Inc.'s lobbying activities are reported as required by U.S. state and federal law. The Company is registered under the Lobbying Disclosure Act and therefore reports quarterly to the Secretary of the U.S. Senate and the Clerk of the U.S. House. These reports are publicly available and provide information on activities and issues the Company is advocating on through communication with covered officials. These reports disclose the Company's lobbying expenditures, as well as issues and legislation that the Company communicated on with covered officials. These reports also identify in-house and third-party lobbyists who are registered to lobby on behalf of the Company. The Company also files publicly available reports as required by states and localities for any lobbying activities at the state or local level.

U.S. House of Representatives Lobbying Disclosures: <https://lobbyingdisclosure.house.gov/>

U.S. Senate Lobbying Disclosures:

[https://www.senate.gov/legislative/Public\\_Disclosure/LDA\\_reports.htm](https://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm)

## **Compliance in the Government Relations Program and Oversight by the Board of Directors**

As outlined in this Policy, Alaska Air Group, Inc. is committed to compliance with all applicable laws and internal policies. The Company's General Counsel and Senior Vice President Public Affairs and Sustainability are responsible for oversight and implementation of this Policy, and for establishing effective reporting and compliance procedures designed to ensure that the Company's political activities (including all political contributions and participation in trade associations) are conducted and disclosed in accordance with applicable law. The Company's General Counsel and

Senior Vice President Public Affairs and Sustainability, or their designee, shall also regularly consult with legal counsel to ensure compliance with applicable federal, state, and local laws.

The Governance and Nominating Committee (the “Committee”) of the Board of Directors monitors compliance with this Policy. Management reports semi-annually to the Committee regarding political contributions made by the Company and the AAG PAC pursuant to this Policy, including the purpose and benefit of political contributions. The Committee may, by resolution, establish an annual aggregated spending limit for contributions made by the Company. The Committee shall periodically review this Policy and shall be responsible for any changes or updates.

#### **Prior Years**

<b>2023</b>	<a href="#"><u>2023 Corporate Contributions</u></a>
	<a href="#"><u>2023 AAG PAC Contributions</u></a>
	<a href="#"><u>2023 Trade Association Contributions</u></a>
<b>2022</b>	<a href="#"><u>2022 Corporate Contributions</u></a>
	<a href="#"><u>2022 AAG PAC Contributions</u></a>
	<a href="#"><u>2022 Trade Association Contributions</u></a>
<b>2021</b>	<a href="#"><u>2021 Corporate Contributions</u></a>
	<a href="#"><u>2021 AAG PAC Contributions</u></a>
	<a href="#"><u>2021 Trade Association Contributions</u></a>
<b>2020</b>	<a href="#"><u>2020 Corporate Contributions</u></a>
	<a href="#"><u>2020 AAG PAC Contributions</u></a>
	<a href="#"><u>2020 Trade Association Contributions</u></a>
<b>2019</b>	<a href="#"><u>2019 Corporate Contributions</u></a>
	<a href="#"><u>2019 AAG PAC Contributions</u></a>
	<a href="#"><u>2019 Trade Association Contributions</u></a>