

THE WAY WE FLY

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ABOUT THE WAY WE FLY

Delta is powered by our people.

As a member of our team, you are our competitive advantage, and you contribute to a diverse and dynamic culture that fuels the Delta Difference. You play a key role in maintaining Delta's reputation as a safe, reliable airline built on a foundation of trust, ethics and integrity. We all share a duty to understand Delta's values and expectations and conduct business with good judgment in all that we do.



ETHICS AND COMPLIANCE ARE NON-NEGOTIABLE

Delta conducts its business ethically and in compliance with all laws. Rules of the Road and The Way We Fly together form the foundation of how we do business around the world and apply to Delta people everywhere. The Way We Fly is based on our core values set forth in Rules of the Road and provides us guidance on our interactions with each other as Delta people, our customers, and our business partners around the world.

Delta is committed to maintaining a Just Culture, where employees and partners are empowered to report hazards and mistakes, leaders are accountable for responding in a fair manner, and we are all committed to continuous improvement.

We understand that people sometimes make mistakes while trying to do the right thing. But we cannot tolerate reckless behavior or conscious disregard for Delta's policies and procedures or other regulations.

It is part of your job as a Delta employee to understand and follow The Way We Fly and speak up when you feel something isn't right. You have an obligation to report violations or suspected violations of Delta's policies.

Outside agents, vendors, suppliers, contractors, consultants, and other third parties of Delta worldwide are also expected to follow The Way We Fly when partnering with and acting for Delta. Together, we all work to uphold and strengthen Delta's culture.

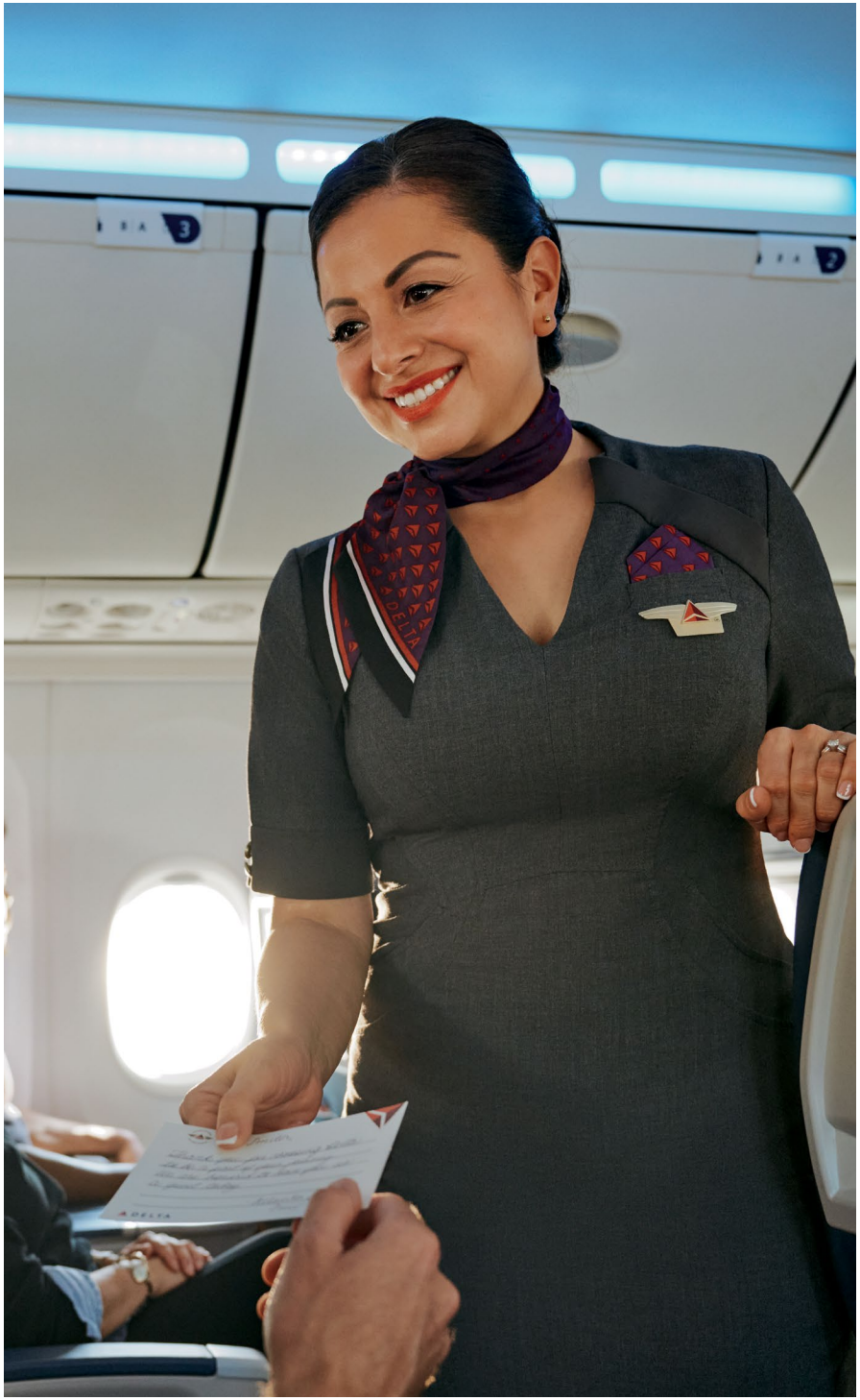
While the policies shared here are important for all Delta employees, they are not the only ones you'll need to know in the course of your career at Delta. You need to actively engage with your manager and HR to fully understand the benefits and privileges provided by Delta, as well as learn and follow the specific policies and procedures relevant to your role and division.

WE ALWAYS STRIVE TO DO WHAT IS RIGHT

At Delta, we make ethical decisions.
If you are ever in doubt about a situation, ask yourself:

- Would I be comfortable telling my friends, family and coworkers?
- Would I want to see this reported in the news?
- Does this show respect towards our people, shareholders, customers, partners and communities where we live and work?
- Does this reflect positively on me? On our Delta brand?
- Is my behavior consistent with Rules of the Road?
- Is it ethical?
- Is it legal?

If the answer to any of these questions is “No,” don’t do it.
If in doubt, ask for help.



WE SPEAK UP

Our culture of caring for our customers and each other is core to who we are as Delta employees. If you observe behavior that may violate Rules of the Road or The Way We Fly, you must speak up. We have an open-door policy, and we hold ourselves and each other to the highest standards of ethics and integrity while striving to do the right thing at all times. If you fail to speak up and report misconduct, you put yourself, your coworkers and Delta at risk.

WE DO NOT TOLERATE RETALIATION

Delta does not tolerate retaliation of any kind. Employees are protected from retaliation when raising concerns or making a report in good faith. As part of a Just Culture, we promise one another fairness and protection when employees choose to do the right thing and speak up. Delta will investigate and take appropriate disciplinary action, up to and including termination, against employees who retaliate. If you suspect that you or someone you know has faced retaliation, report it immediately.

"No one individual can create an airline. An airline is a team."
— C.E. Woolman

HOW TO RAISE A CONCERN

All Delta people are encouraged and expected to raise concerns with their manager and leadership if they witness practices that do not meet our standards. For safety concerns, you should report them immediately. If you have questions, need advice about business ethics or compliance issues, or need to report an ethical concern (including unsafe conditions, workplace hazards or security concerns) you have several resources available:

- Your leader
- Your divisional reporting process (examples include ASAP, SRS, CASS)
- Human Resources
- The **Ethics and Compliance Team** at EthicsandCompliance@Delta.com
- The **Delta Safety, Ethics and Compliance HelpLine** (HelpLine)
- The **Suspicious Activity Reporting** link on Deltanet
- For situations that involve a Delta officer or member of our Board of Directors, you should contact the Chief Legal Officer or the Chief Compliance Officer

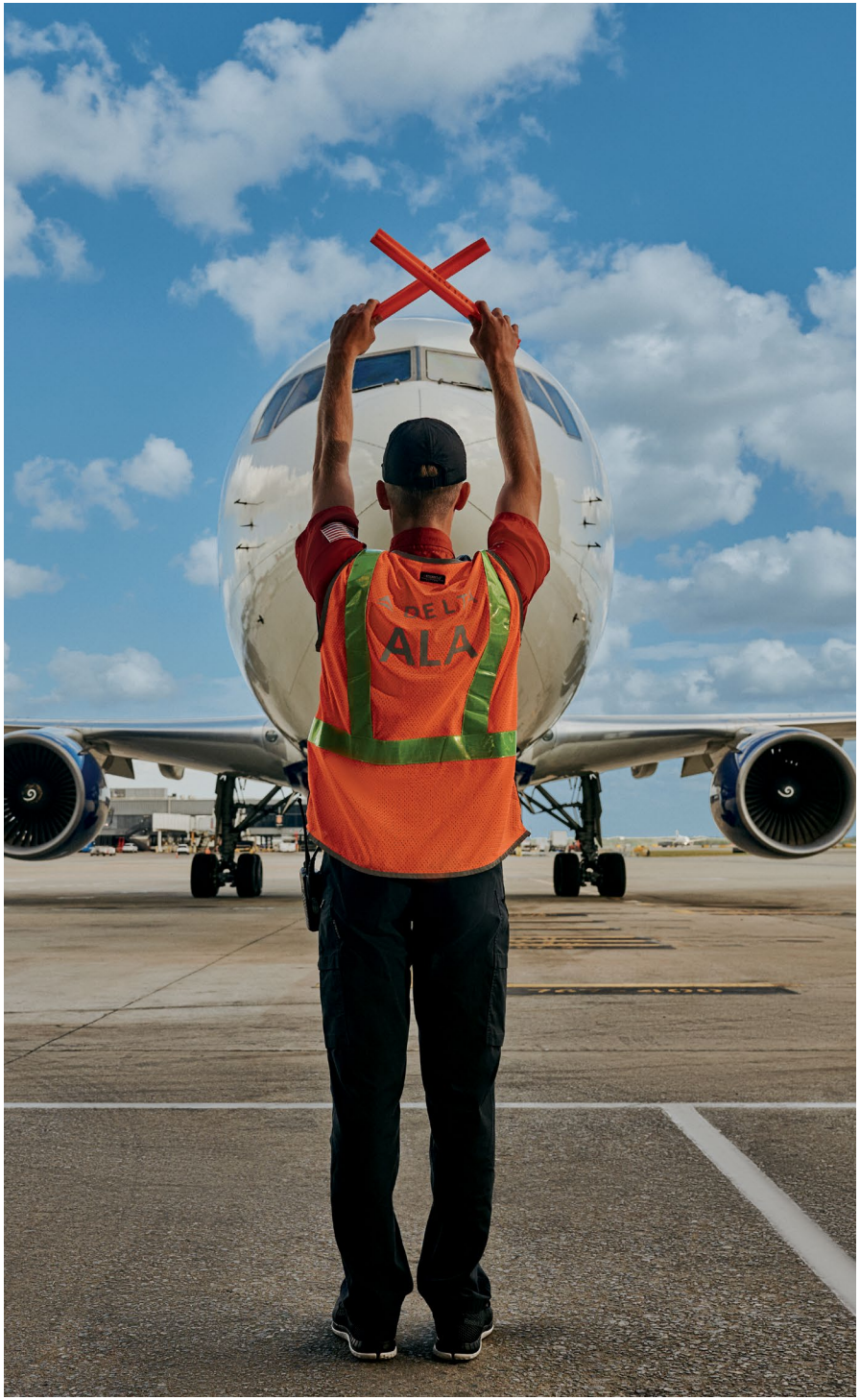
In all cases, you may use the HelpLine.

The HelpLine is available toll-free, 24 hours a day at +1-800-253-7879 within the U.S. and Canada. For international toll-free numbers, please see DeltaHelpLine.com.

You can also submit a written concern in any language on the website. In most cases, employees may report anonymously.

Any employee can make a report to the HelpLine. Additionally, some subsidiaries have dedicated helplines:

Delta Flight Products: DFPHelpLine.com (855-867-7895)
Delta Material Services: DMSHelpLine.com (844-595-5211)
Delta Vacations: DLVHelpLine (866-614-5860)
Endeavor Air: EndeavorHelpLine (844-548-9454)



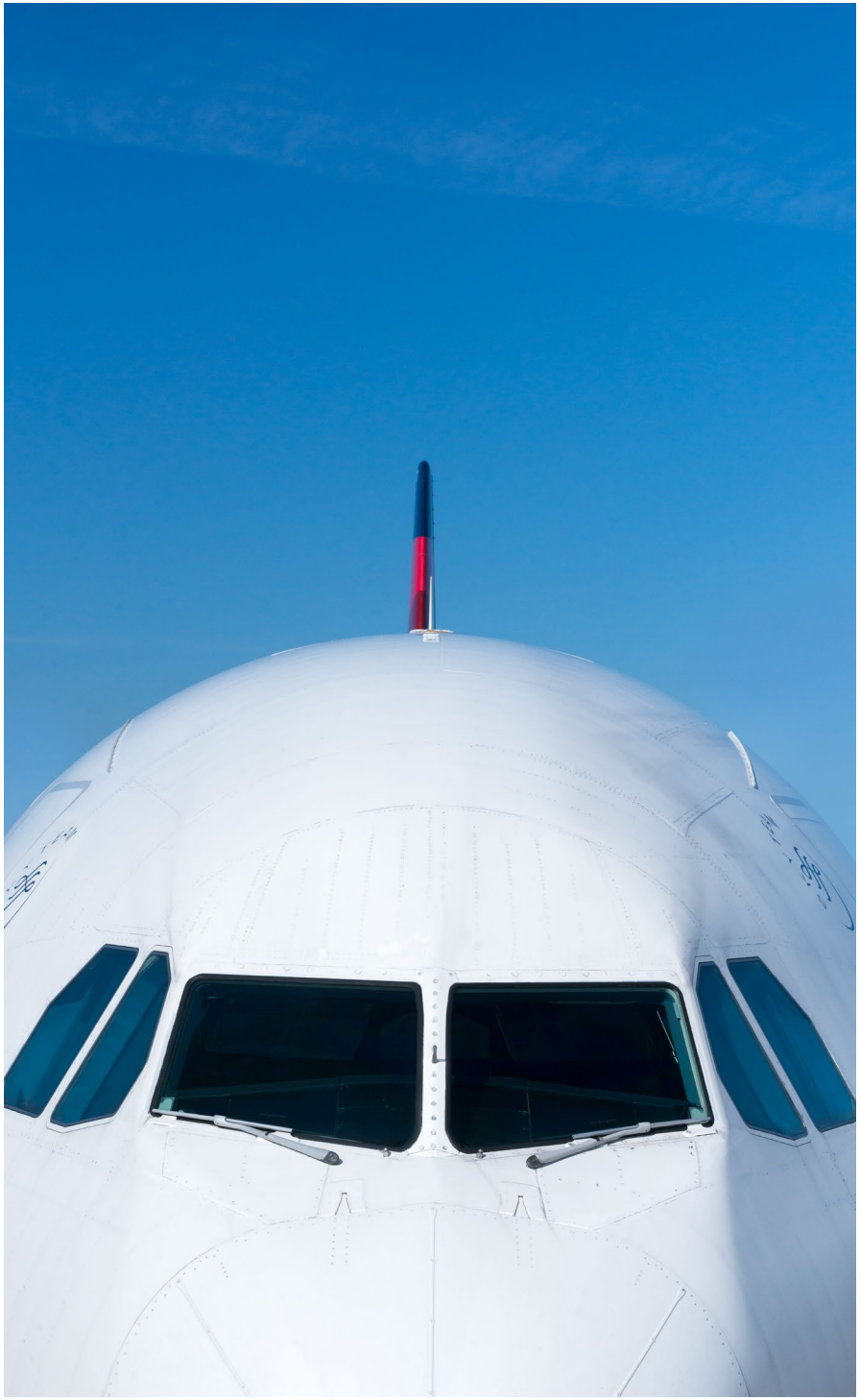
SAFETY

SAFETY, SECURITY AND COMPLIANCE

At Delta, our most important behavior is to put Safety first, always, as outlined in Rules of the Road—whether we're on the ramp, in the air, in the airport, in our maintenance facilities, at a desk or in a conference room. Providing a safe and secure operation is our fundamental obligation to our customers, our colleagues and the communities we are privileged to serve.

We do not tolerate harm to our employees, customers or others. Responsibility for the safety, security and compliance of our operation rests with each of us. Understand the health and safety policies and procedures for your job. Ask questions and make suggestions when you see ways to improve safety or security. Rules are not enough; to achieve our high standards, every employee must make safety and security a priority.

You are responsible for knowing and complying with the environmental laws and policies that pertain to your work. Concerns regarding unsafe or environmentally hazardous conditions should be immediately reported to your manager or through your divisional reporting system (ex. ASAP), to **Corporate Safety, Security and Compliance** in SafetyNet or to the Delta Safety, Ethics and Compliance **HelpLine**.



DRUGS, ALCOHOL AND OTHER SUBSTANCES

As part of our commitment to safety, Delta supports a work environment free from drug and alcohol use. You are responsible for anything you consume and the impact that it has on your work.

No one may bring or use any controlled drug on Delta property, unless properly prescribed by an authorized medical provider. However, marijuana/tetrahydrocannabinol (THC), is not permitted on Delta property even if prescribed by an authorized medical provider. No employee may purchase, use, sell, exchange or transfer any controlled drug on any Delta property. Delta also prohibits the unlawful possession, distribution or use of drugs at any time, on or off duty.

You may not consume alcoholic beverages while on duty, during breaks or lunch periods, or while on Delta premises unless at a Delta-sponsored event. Employees in uniform may not consume alcoholic beverages or visit an establishment which serves alcoholic beverages, with the exception of restaurants that principally serve food.

To support those who may be struggling with addiction, Delta offers assistance and treatment for employees. Employees are encouraged to seek help before actions create a serious health issue or negatively impact dependability or job performance. Delta generally will not terminate an employee if Delta learns of that person's drug or alcohol use as a result of their initiative to seek treatment for a drug or alcohol dependence or addiction.

To find out more on this topic, please refer to the Alcohol Misuse Prevention Program and Anti-Drug Program and applicable divisional policies. For more information, call our Employee Assistance Program at 1-800-533-6939.

WE DO NOT TOLERATE VIOLENCE, THREATS OF VIOLENCE OR WEAPONS

Delta expressly prohibits all acts or threats of workplace violence, including violence or threats of violence to coworkers, customers, suppliers or property. Employees who experience, witness or suspect workplace violence have an obligation to report it immediately.

Delta also maintains a safe workplace free from weapons, including firearms and explosives. As a general rule, possession or storage of firearms, explosives or other weapons is strictly prohibited by anyone (even if licensed to carry a weapon):

- On Delta property (leased or owned, to include parking lots);
- On company business; or
- Attempting to access secured areas, aircraft or Delta property.

Knowingly permitting others to possess or store firearms, explosives, or other weapons in violation of this policy is also strictly prohibited. The limited exceptions to the weapons and firearms policy include possession of a licensed firearm by an armed federal, state or local law enforcement officer while on official business, or a credentialed Federal Flight Deck Officer (FFDO) with an issued firearm while performing FFDO duties. For more information, please refer to the **Delta Security Manual**.

WE DO NOT TOLERATE DISCRIMINATION, HARASSMENT, BULLYING OR OTHER FORMS OF INTIMIDATION

Delta does not tolerate discrimination, harassment, bullying or any other forms of intimidation. Delta has an uncompromising policy against discrimination, harassment, bullying or intimidation of any customer, vendor or employee, based on race, sex, gender, gender identity, pregnancy, age, creed, national origin, citizenship status, marital status, parental status, religion, disability, genetic information, sexual orientation, veteran status or other protected characteristic under local, state or federal law. This policy forms part of Delta's core values and complies with legal requirements. Employees must report any information or situation which they believe could amount to discrimination, harassment, bullying or intimidation.

We do not tolerate sexual harassment. Sexual harassment can include unwelcome sexual advances, requests for sexual favors, verbal or written remarks, physical conduct of an intimate or sexual nature, uninvited touching or sexually suggestive comments that interfere with work performance or create an intimidating, hostile or offensive working environment. Delta takes reports of harassment very seriously. Harassment has no place at Delta and can result in corrective action, up to and including termination.

LIFE AT DELTA

YOUR DELTA JOURNEY

When Delta people succeed together, everybody wins. This is the Delta Difference. Delta employees are the champions of face-to-face connections, and we achieve this by working together. We ensure the customer experience is welcoming, caring and elevated. In the same way that Delta delivers the best customer experience, Delta continually strives to create the best employee experience through a highly competitive compensation package including benefits, career growth opportunities and a great work environment.

We recognize that Delta employment is not always right for everyone. The employment relationship between Delta and each employee is based on mutual consent and can be terminated, either by Delta or by the employee, at will, at any time, consistent with applicable law. As part of the at will relationship, Delta maintains the ability to modify an employee's duties, title, compensation or other terms and conditions of employment, consistent with applicable law.

Any decision to terminate employment follows a rigorous review process, usually after an employee has received previous coaching or corrective action. In some situations, the behavior or policy violation may be so serious that it may warrant an immediate review. Employees are expected to cooperate fully and to be honest with any company investigations and keep such matters confidential.



SEEKING MEDICAL OR RELIGIOUS ACCOMMODATIONS

Delta has a review process in place for anyone who may need help in performing their current job duties due to physical or mental impairment, pregnancy, or religious beliefs or practices. If you need this type of assistance, contact the Accommodation department for consideration. They will carefully review your request and help to identify reasonable accommodations. For more information, please refer to **Delta's Job Accommodation Program Policy – Guidelines for Employees**.

REPRESENTING THE BRAND

Earning and keeping customer trust in our brand is the core of our business. As Delta people, we respect as well as seek to understand and inspire both our customers and each other. We know that how we act and what we say reflects on the Delta brand. Give and be your best. Keep your words and actions professional and honest. Reward and recognize a job well done. Our brand requires high-performing, motivated employees who operate as a team for peak performance. We show up every day ready to win, together.

YOUR OFF-DUTY CONDUCT

As a general practice, Delta does not monitor or become unnecessarily involved in employees' off-duty, off-premises conduct. However, Delta will review and respond to situations where conduct involves other Delta employees, vendors or serious acts of misconduct that contradict Rules of the Road.

For example:

- Bringing negative attention which reflects poorly on Delta, including through social media
- Jeopardizing Delta's business relationships with vendors, such as through personal relationships
- Harassing or mistreating another Delta employee
- Disrespecting a Delta customer, vendor or employee
- Misusing Delta information, services or property
- Creating safety and security concerns for Delta
- Engaging in unlawful conduct, including conduct resulting in arrests or criminal charges

"Quality begins with people."
— C.E. Woolman

MEDIA AND SOCIAL MEDIA

At Delta, we're not only connecting people to places but people to people—and this includes media, social media and brand events. Whether we are at work or on the go, we always represent Delta. As representatives of a global airline that celebrates diversity and promotes respect, and as part of Delta's commitment to diversity, equity and inclusion, everyone has a shared responsibility to listen, learn and understand the diverse world we serve. We must hold ourselves accountable to embody these values in our everyday actions, words and behavior.

Delta does not tolerate hateful or discriminatory language or content that harasses or mistreats others in any forum. Ensure your language and behavior follow Delta values and **Social Media Policy**.

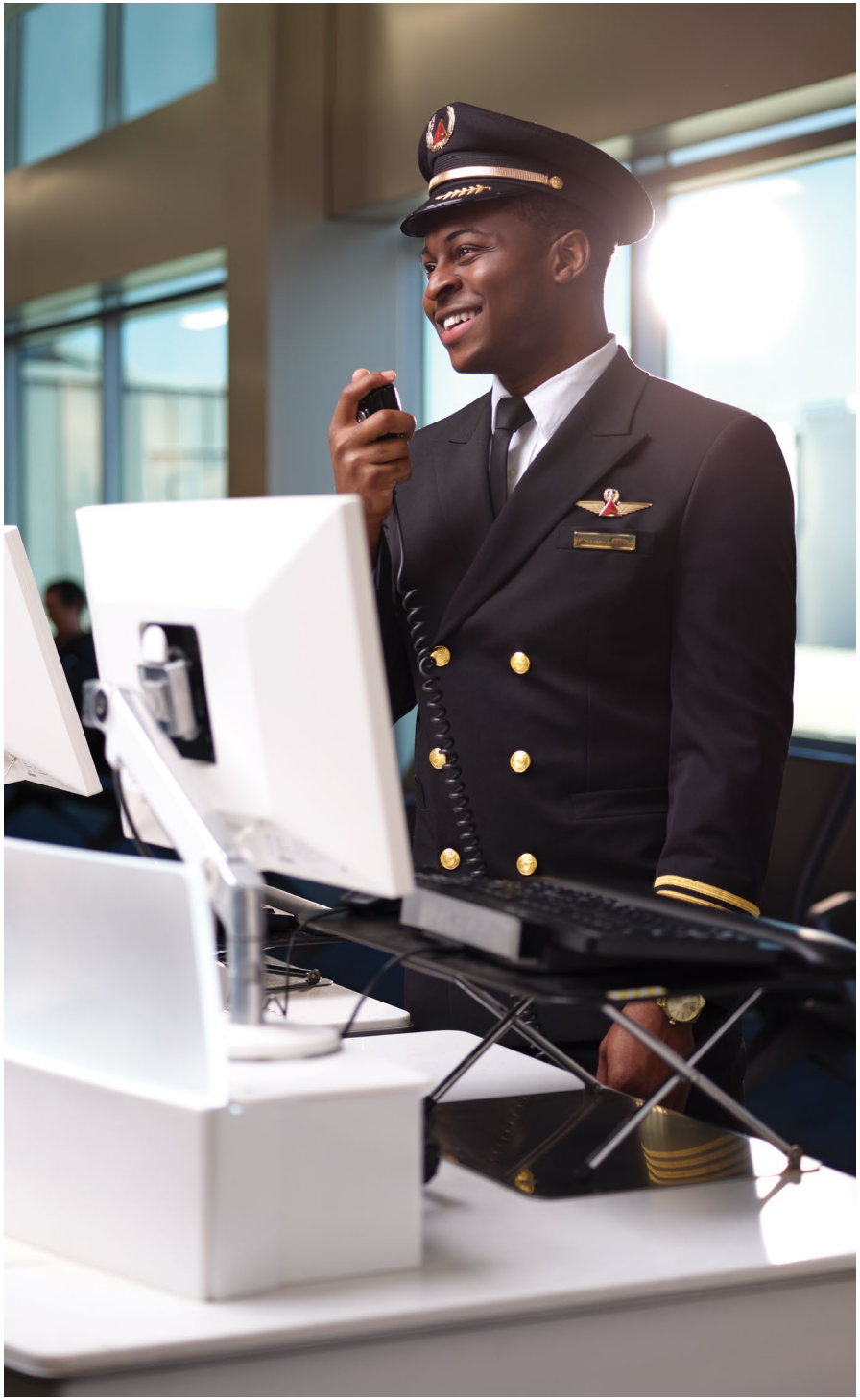
While all employees' actions reflect the Delta brand, not all employees are Delta spokespeople. If you are approached by media or have an external opportunity to represent Delta, please consult the Delta Corporate Communications team for support and abide by our media guidance.

POLITICAL ACTIVITY

We respect employees' rights to be involved personally in their communities and political affairs. However, Delta is subject to strict limits on political activity and contributions to political parties and candidates. Separate your own political activities from Delta activities. Never engage in personal political activity using Delta time, email, property or equipment.

Employees may not make direct or indirect political contribution to candidates, office holders, political parties, or political organizations on behalf of Delta, unless Delta's Chief Executive Officer, SVP Government Affairs, VP State Government Affairs or Chief Legal Officer pre-authorizes it. Contributions can include but are not limited to:

- Purchasing tickets on behalf of Delta;
- Providing Delta goods or services (including hosting events);
- Use of Delta facilities, email or personnel for fundraising or political activities;
- Paying for advertisements and other campaign expenses; or
- Reimbursing political expenses resulting in arrests or criminal charges.



PROTECTING DELTA

PRIVACY AND DATA PROTECTION

Delta is committed to upholding data privacy and respecting the rights of those whose personal data we collect and use. Delta people should not access personal information unless a legitimate business need exists, and individuals who have such authorization should only disclose personal information in compliance with both applicable laws and Delta's policies. Please refer to the **Privacy Policy** or contact the Data Protection Officer at **Privacy@Delta.com**.

Delta believes in respecting the confidentiality of employees' personal information. Access to personal records is limited to those who have appropriate authorization and a business need for that information. Additionally, recording conversations or communications in the workplace is not permitted, except in compliance with the Meeting Recording, Transcription and AI-Generated Note-Taking and Meeting Summary Policy. Capturing images of other employees or customers without their knowledge and consent is also prohibited.

PROPRIETARY INFORMATION AND INTELLECTUAL PROPERTY OF OTHERS

Delta respects the proprietary and confidential information of others, including written materials, software, music, video and other forms of intellectual property.

- Do not bring to Delta from other companies any confidential information or proprietary materials or inventions including records in any format.
- Do not load any unlicensed software on any Delta-owned computer.
- Do not accept or use anyone else's confidential information or proprietary inventions or materials.
- Do not reproduce, distribute, or use any copyrighted documents or materials (including trademarked slogan, logo, name, or image in materials you are producing such as reports software, music or videos without specific permission from the copyright owner under an agreement approved by the Law Department. Pictures on Google or elsewhere on the internet are not necessarily free for use and might be license-protected.
- Do not knowingly infringe anyone else's patent. If you have any concerns about potential patent infringement or use of patented technologies or if you become aware of an issue involving a third party's patent, you should contact the Law Department. Do not search for, read, or communicate any opinions regarding the validity or scope of another party's patent.

DELTA'S PROPRIETARY INFORMATION

We all have a duty to keep proprietary information confidential and protect it from disclosure. Proprietary information that you create during the course of your employment belongs to Delta.

Examples of Delta's proprietary information include:

- Customer, sales, marketing and other corporate databases;
- Marketing plans;
- Employee personnel records;
- Research and technical data;
- Business ideas, presentations, policies, processes, proposals or strategies;
- Intellectual property, such as actual or potential patents, copyrights or trademarks;
- Computer software; or code.

Best practices for computer and network security include:

- Do not share your username or password with others. Delta will never request this information.
- Do not open suspicious emails or attachments. Report phishing directly from your email inbox.
- Do not click "yes" or "accept" on any "shrink-wrap," "click-through," "browse-wrap," or similar license forms contained within or associated with software.
- Limit your use of such public wireless networks for confidential business purposes. Wireless networks are inherently insecure.
- Protect all entry points into Delta networks, including your mobile device, from unauthorized access.
- Do not install any hardware or software with network monitoring capability.
- Use sensitive, proprietary, and confidential information only for legitimate Delta purposes, and never for your personal benefit or in any inappropriate way. This obligation continues even when your Delta employment ends.
- Do not enter any Delta proprietary information into any publicly available Generative AI software, including through your personal devices, or personal accounts. Generative AI includes software applications such as ChatGPT, Bard, Bing AI, DALL-E, GitHub CoPilot, Stable Diffusion, Midjourney, ModelScope and similar tools.
- If you become aware of suspicious activity, improper disclosure or theft of Delta data, or other network security issues, immediately contact the **IT HelpDesk**, **CyberSecurity** or the **HelpLine**.

All electronic activity and communications using Delta property, including hardware, software and transmission tools, may be monitored from time to time with or without prior notice as permitted by applicable law.

Employees should not anticipate a guarantee of privacy when using Delta equipment or Delta email or when accessing personal internet accounts from the Delta network or Delta devices. Please refer to the **Information Security Policy**, **Information Security Standards** and **Information Technology Acceptable Use Policy**.



ACT WITH INTEGRITY

Our culture of honesty and integrity builds trust. Delta expects honesty in your work. You must not be untruthful with, mislead, or attempt to mislead the government or anyone at Delta.

Acting with integrity includes complying with all applicable laws of different countries, without exception. As a global carrier, we are subject to many applicable U.S. and international laws. We expect employees to bring compliance issues to Delta's attention because Delta's business and reputation are at stake.

The following sections focus on various important laws that apply to Delta's global business activities, and particularly to Delta as a U.S. Government contractor.

"Any individual or business that is completely honest in all its dealings is likely to succeed."
— C.E. Woolman

ANTI-CORRUPTION

Delta does not offer bribes, kickbacks or other similar payments to anyone, whether government officials or customers, regardless of local practice or custom. Bribery, offering something of value to another person with the corrupt intent of receiving a business advantage for Delta, is illegal everywhere Delta operates. This rule applies to Delta employees, Delta contractors, Delta subsidiary employees, and Delta agents and suppliers worldwide.

Interactions with government officials are particularly sensitive. Many government officials, in and outside of the U.S., are not permitted to accept anything from Delta. This means that we cannot offer anything to those government officials, even if we have no improper intent. Government officials include elected officials and staff, employees of government agencies, employees of state-owned or partially state-owned entities including airlines or airports, and government inspectors.

Before offering any upgrades, fee waivers, meals, travel, per diems, gifts or entertainment to any government or public official or employee of any government agency at any level for any reason, contact the Ethics and Compliance Team for preapproval. This also applies to operational inspections where Delta is legally obligated to reimburse some of the inspection costs. Please refer to the Anti-Corruption Policy.



GIFTS AND ENTERTAINMENT

Offering and receiving business gifts and entertainment can strengthen professional relationships if they are legal, reasonable and proportionate. When abused, offering or receiving gifts or entertainment could be, or be viewed as, an illegal act, a conflict of interest, bribery, an abuse of Delta assets or theft. Determining if a gift or entertainment is acceptable involves exercising ethical business judgment.

Gifts include goods, discounts, services, favors, opportunities, employment, gift certificates or anything of value. Entertainment includes invitations to dinners, other meals, lodging/hotels and tickets to all types of sports, concerts or other events. If someone offers you event tickets but does not accompany you to the event, the tickets are considered a gift, rather than entertainment.

RECEIVING GIFTS AND ENTERTAINMENT

Use good judgment in accepting entertainment or gifts from Delta vendors or business partners. Avoid situations which might diminish or appear to diminish your objectivity. Employees may receive, but should not solicit, gifts with a value of up to $100 or the local currency equivalent. You should respectfully decline or return gifts that exceed $100. You should also decline gifts that are repeatedly given, or are offered in the form of cash, loans or commissions. Do not accept gifts from vendors or business partners during active bids or negotiations.

If a Delta vendor or partner offers you tickets to premium events or entertainment such as the Super Bowl, World Cup, Olympics, Formula 1 races, the Grammys or other premium events, you must decline the invitation unless there is a compelling business reason for your attendance. For this exception, you must receive prior approval from your divisional vice president or higher. You should also decline hospitality which primarily consists of leisure rather than business activities (such as ski or beach resort trips).

Employees in Supply Chain Management or in procurement roles in other divisions should exercise additional care before receiving any gifts and entertainment from Delta vendors, particularly during active bid processes and negotiations.

OFFERING GIFTS AND ENTERTAINMENT

Employees must be thoughtful about how we offer gifts and entertainment on Delta's behalf. You should ask the recipient if their company policies allow them to accept the gift or entertainment. Neither an employee nor anyone acting on Delta's behalf may offer gifts or entertainment to customers or third parties as an attempt to improperly influence their business decisions, or at a time or in a manner that could be perceived as such an attempt. This would include during a bid, contract negotiation or official application for operational or other approvals. Offers made during these periods could be perceived as being made with corrupt intent and be viewed as a bribe.

As stated in the Anti-Corruption section, you must obtain pre-approval from the Ethics and Compliance Team before offering any meals, travel benefits, per diems, gifts, employment or entertainment to any government officials or government employees or their family members.

This applies even when Delta is required to pay costs associated with Delta facility inspections by government officials. Please refer to the Anti-Corruption Policy and the Anti-Corruption section of this document.

Any gifts and entertainment you offer as a Delta employee must be properly documented (with all parties involved, date, location and purpose). Employees may not use personal funds to avoid this policy. Employees are never permitted to expense to Delta the cost of personal gifts and entertainment for themselves, family or friends, unless there is a legitimate business purpose. Such abuse is potentially fraud or theft.

Before giving or receiving a gift or entertainment, consider whether it is:

- Given to a government official or family member of a government official?
- During a time-sensitive period (such as during a bid, contract negotiation, or official application)?
- Cash or the equivalent (gift certificates, stock, stock options, loans or vouchers)?
- Potentially seen as an inappropriate attempt to influence?
- Not known or approved by management and not properly documented?
- In violation of the receiver's policies?
- In exchange for doing something or agreeing not to do something?
- Excessive or lavish?
- In violation of our commitment to dignity and mutual respect for all individuals and could be seen as potentially embarrassing if disclosed publicly? (e.g., entertainment that is unsavory, inappropriate or sexually oriented in nature)
- In violation of applicable laws?

If you answered "yes" to any question above, contact the **Ethics and Compliance Team** before giving or receiving gifts.

COMPLETE AND ACCURATE BOOKS AND RECORDS

Every employee must keep complete, timely and accurate books and records of our transactions, as required by law. This includes time sheets, expense reimbursements, waivers and accommodations, operational records, sales tools, invoices, payroll and benefit records, regulatory data, performance evaluations, and other essential Delta information.

All employees must:

- Follow all laws and Delta procedures for reporting financial information.
- Never deliberately make a false or misleading entry in a report or record.
- Never suppress, alter, or destroy Delta records without authorization.
- Maintain records in accordance with the Records Management Policy.
- Never provide or allow an employee to provide false or misleading information to anyone within Delta.
- Never provide false or misleading information to any third party, including Delta's auditors or a government agency.
- Never sell, transfer or dispose of Delta assets without proper documentation and authorization, which includes bartering of goods and services.

Please refer to the Records Management Policy and Enterprise Records and Information Management on Deltanet regarding retention and record disposition.



ANTITRUST AND FAIR COMPETITION

Delta competes vigorously and complies with antitrust and other competition laws in all countries where we do business. Antitrust laws are designed to preserve fair competition in our free market economy. Such laws are complex and prohibit agreements between actual and potential competitors that result in an unreasonable restraint of trade.

- Avoid formal or informal discussions with any competitor that involve receiving or sharing commercially sensitive, non-public information (information about fares/rates, contract terms, network plans, hiring, compensation, strategic plans, customers, competitive bidding processes, employee compensation, or similar matters).
- No discussions, digital or verbal, are 'off the record.'
- If you are a leader, or you work in Delta's pricing, revenue management or network divisions, you should not interact with our competitors without first obtaining guidance from the Law Department. Please refer to the **Antitrust Compliance Manual** and **Alliance Antitrust Compliance Guidelines**
- In obtaining market intelligence about the market and our competitors, use only publicly available information from public sources (like published documents, advertisements, brochures, internet and customers).
- Never obtain competitor information through unlawful or unethical means (like misrepresentation, deception, theft, spying, bribery or unauthorized disclosures by a competitor's employees or consultants).
- Delta prohibits any employee from bringing commercially sensitive, non-public information to Delta from former employers or vendors. Hiring managers must discourage this.

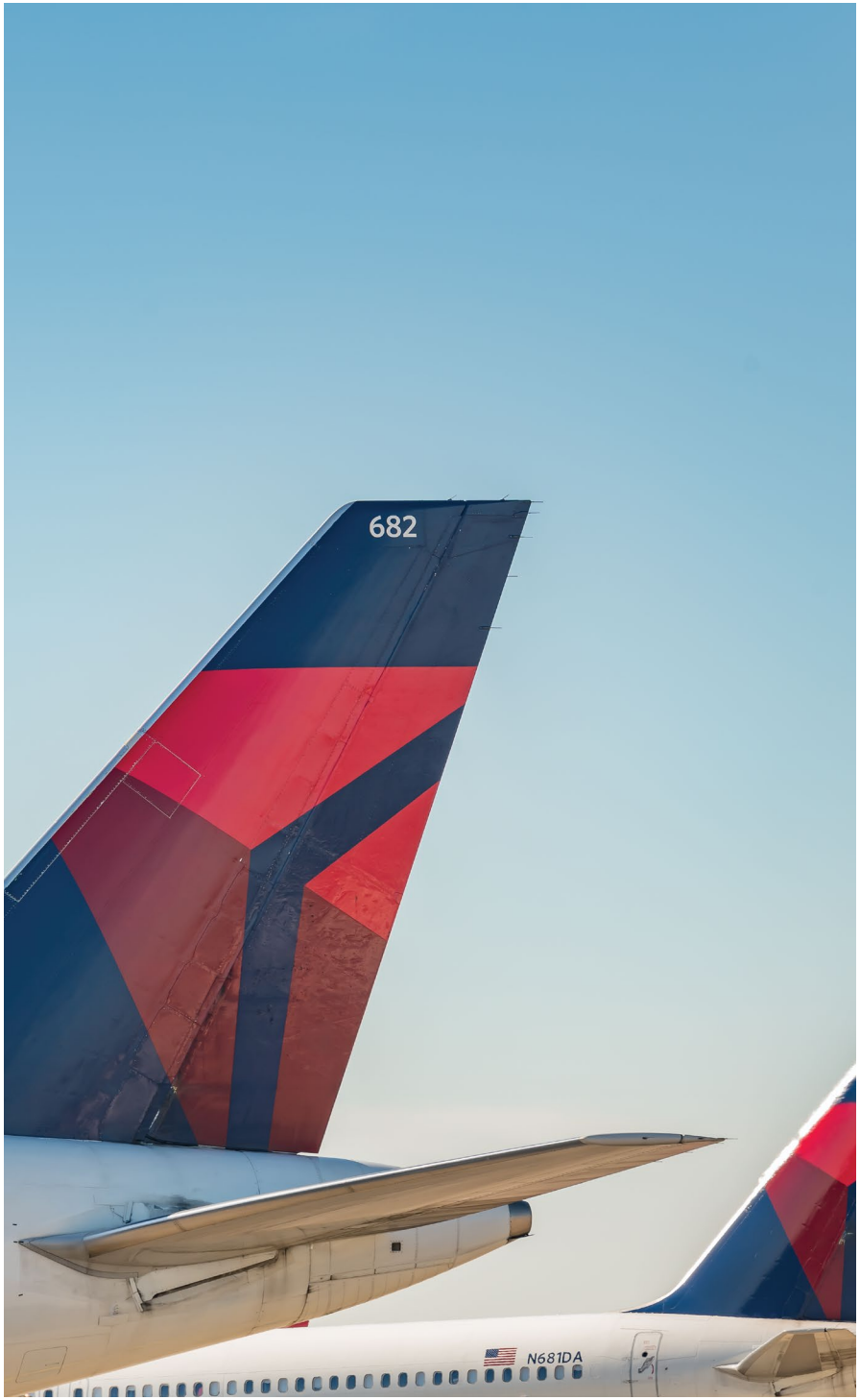
SANCTIONS, INTERNATIONAL TRADE AND BOYCOTTS

The U.S. Government issues complex economic sanctions that prohibit Delta from doing business with certain countries (e.g. North Korea, Syria), entities, and individuals. Sanctions can affect booking and ticketing activity, vendor relationships, SkyMiles membership, purchase and sale agreements and cargo transport. To ensure Delta complies with these requirements, the Ethics and Compliance Team conducts due diligence for various business units. Contact the **Ethics and Compliance Team** for support.

The U.S. Government also has regulations designed to prevent U.S. companies from participating in certain boycotts. If you see any mention of a boycott (including in any contracts), inform the **Ethics and Compliance Team**.

Delta also complies with all U.S. export controls when moving goods and technical data outside of the U.S. Please refer to **Trade Sanctions and Restrictions** on Deltanet.





CONFLICTS OF INTEREST

When we make decisions at work, we must make them with integrity and free from conflicts of interest—even the appearance of them. A conflict of interest may occur when our interests or activities affect our ability to make objective decisions for Delta. Conflicts of interest can undermine internal organizational trust and damage our reputation. If you think you may have a conflict of interest, or that others could possibly perceive that you have one, you must promptly disclose to Human Resources. An open and honest discussion about a potential conflict of interest is always best. Conflicts of interest come in many forms.

OTHER EMPLOYMENT: Employees may have employment outside of Delta, but it must never interfere with or detract from your job duties with Delta or be conducted on Delta time or with Delta assets. Working (whether as an owner, employee, contractor, vendor or otherwise) for another airline, any Delta competitor, regulator, supplier or anyone seeking to be a supplier, or subsidiary is only allowed if you receive prior written approval from Delta following its review of the potential conflict.

COMMUNITY ENGAGEMENT: Delta encourages its employees to be active in the community, including as members of boards and advisory boards. Consult with the **Ethics and Compliance Team** for more information.

CONFLICTS OF INTEREST (CONTINUED)

INVESTMENTS: Be careful that your investments and ownership interests do not create conflicts of interest or impair your objectivity. Do not use corporate property, information or your Delta position for personal gain. Do not take for yourself business opportunities that properly belong to Delta. Do not compete with Delta or its subsidiaries. Conflicts can occur when employees invest in competitors, suppliers or customers. However, investments in publicly-traded mutual funds, index funds and similar pooling of securities, when the individual investor has no say in which investments are included, do not usually present conflicts. If you have questions about whether an investment or other business opportunity poses a conflict, please contact the **Ethics and Compliance Team** with questions. Please also refer to the **Insider Trading Policy**.

FAMILY: Delta does not generally restrict employment at Delta of family members, which means an employee's spouse, domestic partner, parents, children, siblings or anyone living in the employee's household. However, family members may not work in your direct or indirect reporting line without disclosure to your leader and to Human Resources. If a family member works in your direct or indirect reporting line, you must report to Human Resources and your leader, who will work to address the potential conflict of interest.

A direct reporting relationship exists when one employee directly reports to or is supervised by another. An indirect reporting relationship exists when an employee works in a vertical reporting line with one or more employees in between.

PERSONAL RELATIONSHIPS: Intimate relationships between employees may present a conflict of interest. Intimate relationships include romantic or sexual relationships which can undermine employee trust and give rise to claims of preferential treatment. Delta prohibits intimate relationships between employees who have direct or indirect reporting relationships unless you have promptly disclosed the relationship to Human Resources and the potential conflict of interest has been addressed. Consensual intimate relationships between peer employees (whether at the same or different level, including flight crews and those working in the same division or work group) are permitted, so long as the relationship does not create complications in the workplace, or adversely impact the performance of either employee's duties. Employees in an intimate relationship should not attempt to influence the other employee's employment terms and benefits, including work assignments, schedules, compensation, developmental and promotional opportunities. Some events, such as promotion, business reorganization or new assignments, may cause employees to be in reporting relationships that may violate this policy. If this occurs, both employees engaged in an intimate relationship must report the relationship to Human Resources and their leaders, who will work to address the potential conflict of interest.

Officers and Directors may not engage in an intimate relationship with any employee below their employment grade level, even if that employee is not in their direct or indirect reporting line, unless timely disclosed to and approved by the Chief Compliance Officer.

INSIDER TRADING

You must not trade Delta stock while you have material inside information about Delta. You must not provide material inside information to others ("tipping"). If you buy or sell stock while you have material inside Delta information (or tip others, including family or household members), you (and they) may be charged with a crime and/or sued in a civil lawsuit.

In general, material inside information is non-public information that would influence a reasonable investor's decision to buy, hold or sell stock.

Certain levels of management always need pre-clearance before trading Delta stock. Delta has company-specific trading windows which apply to some employees. Employees are obligated to know which pre-clearance or trading window rules apply to their roles.

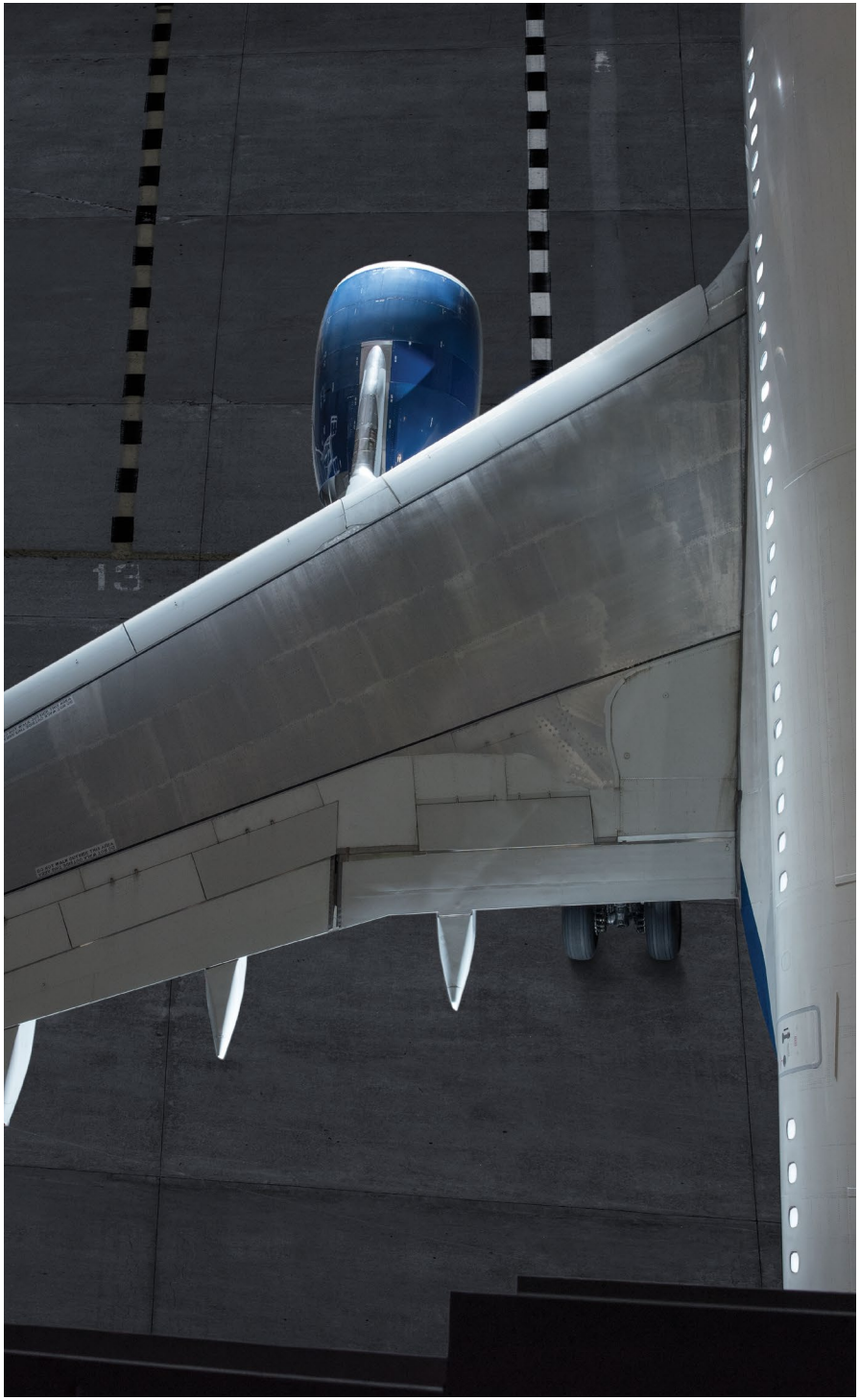
Laws regarding trading in securities and how information affects reporting and other obligations are complex. For this reason, only authorized persons can talk to the media or the investment community on behalf of Delta. Please refer to the **Insider Trading Policy**.

PREVENTING BOOKING AND TICKETING FRAUD AND ABUSE

As good stewards of our financial resources, we must prevent booking and ticketing fraud and abuse. You must not create or work in bookings for yourself, your friends, family or your pass riders.

If you suspect ticketing fraud or other such abuse, you must report it to the Revenue Protection Unit with the online tip form or to the HelpLine.

Please refer to **Delta's Policy Against Booking and Ticketing for Friends, Family and Self**.



PASS TRAVEL: WITH GREAT PRIVILEGE COMES GREAT RESPONSIBILITY

Our pass travel program is a privilege to enjoy and use responsibly. Pass travel should only be used for leisure travel. Delta expects excellent travel etiquette and appropriate attire for all nonrevenue passengers.

- It is your responsibility to ensure that your pass riders appropriately use your privileges, exercise good judgment and comply with Delta's pass policy.
- Do not give your Delta network credentials to others to book travel.
- Never sell buddy passes, travel companion privileges, vouchers, SkyMiles or Medallion status, or other travel privileges.
- Non-revenue standby travel is prohibited on any flight on the same day, same origin city and same destination city for which a pass rider is holding or has held a confirmed reservation and was not canceled at least 7 days prior to departure.
- You may not use pass travel privileges for personal business travel or other unauthorized purposes not specifically permitted in Delta's Pass Travel Policy.

If you or your pass riders fail to comply with all applicable rules, it can result in disciplinary action up to and including termination of your employment, or suspension or termination of your nonrevenue and reduced-rate travel privileges. If you suspect pass travel abuse, you must report it to the Revenue Protection Unit or the HelpLine.

THEFT AND DAMAGE

The theft, attempted theft or unauthorized possession of any property, money or other assets belonging to Delta, a colleague, customer or any other person, is prohibited. This includes:

- Consuming or taking items that are intended for our customers, such as food or beverages
- Falsifying records, including timecards, work records for business expense reports
- Unauthorized waivers or favors particularly for friends, family and self
- Unauthorized distribution or use of travel, hotel or transportation vouchers
- Using company business travel for employee leisure travel
- Selling or bartering pass travel privileges (buddy passes or Travel Companion status)
- Using or allowing any of your travelers to use pass travel privileges for any business-related purpose

Our premises, aircraft, vehicles, tools and other equipment are valuable assets that we all must safeguard. Repair or replacement of property is expensive and takes away from company assets that we all share.

COOPERATING WITH INVESTIGATIONS AND LITIGATION

At times, you may also be asked to provide information in an internal company or external, government investigation. **You must deal honestly with all government officials and with Delta.** Your lack of honesty or cooperation is grounds for your termination. If you receive a subpoena, letter, phone call, personal visit or other request from a court, the government, law enforcement that relates in any way to Delta, or if you are the subject of an inquiry or investigation by law enforcement or a government agency that relates in any way to your role at Delta, you must immediately report it to your leader, your HR representative or contact the Law Department. In the same way we cooperate with government investigations, you are expected to fully cooperate in company investigations.

BE A RESPONSIBLE GLOBAL CITIZEN

REFLECTING THE WORLD

We actively seek diversity, boldly pursue equity and consciously promote inclusion to foster a sense of belonging for all employees. We value all perspectives because we know our differences make us stronger. We are on a mission as a global company to better reflect our world through our hiring practices and retention of employees. We are an equal opportunity employer. We actively seek diversity in hiring, internally and externally, with a skills-first mindset and take deliberate actions to reduce bias through the talent life cycle. Delta is committed to hiring the most qualified candidate in each instance.

OUR COMMITMENT TO THE ENVIRONMENT AND OUR FUTURE

At Delta, our long-term sustainability strategy is organized under two pillars: embedding sustainability in everything we do and eliminating our climate impact from flying. We're committed to offering a more sustainable travel experience and achieving net-zero emissions by 2050. This will require each of us taking responsibility to incorporate sustainability into our everyday decision making to ensure our business and operations become more environmentally sustainable.

Delta is committed to complying with all environmental laws and regulations and exceeding them where we can in the pursuit of our goals. You are responsible for knowing and complying with the environmental laws and policies that pertain to your work. Concerns regarding unsafe or environmentally hazardous conditions should be immediately reported to your manager, or through your divisional reporting system (ex. ASAP) to **Corporate Safety, Security and Compliance via Hazard Reporting** in SafetyNet or to Delta's **HelpLine**.

HUMAN RIGHTS

Delta is a global company that connects people with customers and employees who live all over the world. Delta is committed to being a force for global good and protecting human rights based on the following principles:

- No one should be unfavorably treated based on the following factors including but not limited to race, ethnicity, sex, sexual orientation, gender, gender identity, language, marital status, physical ability, pregnancy, medical condition, religion, political affiliation, national origin, ancestry, military or veteran status, class, property or place of birth.
- Delta denounces all forms of human rights abuses, including human trafficking; child labor; forced or bonded labor; harsh or inhumane treatment; and commercial sexual exploitation of children ("Human Rights Abuse").
- Delta fully supports all applicable criminal laws and regulations aimed at preventing Human Rights Abuse. We apply our knowledge, expertise and purchasing power to help address economic, environmental and social challenges in communities that we connect and serve.

If you spot a possible sign of human trafficking while on duty, you should report it to your leader or the OCC at (404) 715-0006, or submit the significant incident summary report (see the ACS/OCC ACS Desk page on Deltanet). If you spot any signs of human trafficking while off duty and the facts indicate possible trafficking activities, please contact the National Human Trafficking Hotline at 1 (888) 373-7888 or text "HELP" or "INFO" to 233733.

Explore our digital Rules of the Road
and The Way We Fly on Deltanet

