

## **Anti-Slavery and Anti-Human Trafficking Statement for year ending December 2024**

This statement is made on behalf of United Airlines Holdings, Inc. (together with its consolidated subsidiaries, “United”) pursuant to the UK Modern Slavery Act 2015, the Australia Modern Slavery Act 2018, and Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (collectively, the “Acts”) and sets out the steps United has taken, including through the end of its fiscal year ending December 31, 2024, to ensure that slavery and human trafficking are not taking place in its supply chains and in any part of its business.

### **Business Structure, Operations and Supply Chain**

United Airlines Holdings, Inc. is a holding company and its wholly owned subsidiary is United Airlines, Inc.. United’s shared purpose is “Connecting People. Uniting the World.” United, with its corporate headquarters based in Chicago, Illinois, United States, operates the most comprehensive global route network among North American carriers, including U.S. hubs in Chicago, Denver, Houston, Los Angeles, New York/Newark, San Francisco, Washington, D.C. and Guam. From these hubs, United transports people and cargo throughout North America and to destinations in Asia, Europe, Africa, the Pacific, the Middle East and Latin America.

Our business objectives are enabled through our extensive supply chains. Our supply chains are complex as we rely on a global network of employees, local business partners and suppliers. We source aircraft from major manufacturers and obtain parts and maintenance services globally. We also secure in-flight food and consumables from providers located across North and South America, Europe and Asia and distribute materials through a diverse transportation network that includes trucking, air freight and cargo shipping.

### **Commitment**

We acknowledge the role that the transportation industry plays in eliminating human trafficking. We are committed to addressing modern slavery risks in our operations and supply chains to help put an end to human trafficking. As a global enterprise, we support and respect international principles on human rights, including principles reflected in the International Bill of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work and the United Nations’ Guiding Principles on Business and Human Rights.

We do not recruit child labor and we support the elimination of exploitative child labor. Moreover, United supports laws duly enacted to prevent and punish the crime of sexual exploitation of children and will cooperate with law enforcement authorities on these matters.

### **Accountability Standards**

United’s Code of Ethics and Business Conduct (“Code”) serves as the cornerstone of United’s ethics and compliance program and is an important tool to help employees make the right decisions to ensure that we conduct our business ethically and legally. United’s commitments to addressing modern slavery risks in our operations and supply chains and not recruiting child labor are set forth in the Code. As stated in the Human Rights Policy Statement included in the Code, United strives to have transparent operations and supply chains that are free from “modern slavery” risks, supports the elimination of all forms of forced, bonded or compulsory labor, condemns all forms of

exploitation of children, supports the elimination of exploitative child labor, supports laws duly enacted to prevent and punish the crime of sexual exploitation of children and will cooperate with law enforcement authorities on these matters.

All employees receive communications about the Code and are periodically required to acknowledge that they have read and agree to comply with the Code.

United offers a Compliance and Ethics Helpline for employees and third parties to report concerns related to potential violations of, and to ask questions about, the Code. If we learn of any allegations of slavery or human trafficking through the Compliance and Ethics Helpline, we will promptly investigate and act to remediate the situation in a responsible manner, including coordinating with law enforcement and airport authorities, as appropriate.

Our Code is available via the following link:

[Code of Ethics and Business Conduct](#)

In addition, as a contractor who provides services to the U.S. Federal Government, United—and any individuals, agents and subcontractors furnishing supplies or services in support of those contracts—is required to comply with specific requirements that prohibit conduct related to forced labor, human trafficking and related acts. United’s Policy for Interacting with the Government and United’s Operating Manual for Bidding on and Performing Government Contracts contain additional information about United’s strict compliance with specific obligations it undertakes under government contracts to respect human and worker rights. We will continue to evaluate our policies and practices on this topic to ensure compliance with applicable laws and our high ethical standards and to meet the expectations of our customers, our shareholders, our communities and other stakeholders. We will communicate publicly our intentions and efforts accordingly.

### **Supply Chain Due Diligence and Compliance**

Responsible supply chain management is core to how we do business. To advance our responsible sourcing goals, we have developed Partner and Supplier Guiding Principles, which summarize the minimum ethics and business conduct expectations for our business partners, vendors, suppliers and third parties. We are committed to upholding human rights across our global supply chain and expect our business partners, vendors, suppliers and third parties to conduct business in a manner consistent with internationally proclaimed human rights.

With respect to our current supplier human rights due diligence process, we have deployed technology solutions and have established certain procedures in our procurement processes to facilitate risk and compliance due diligence reviews of our suppliers and other third parties. These reviews help ensure that our suppliers and other third parties are also complying with applicable laws (including with respect to ethical labor practices, safe working conditions and responsible sourcing standards) and are held to the same standard set forth in our Human Rights Policy Statement in the Code and our Global Policy on Worker Welfare. We also use the information from the reviews to identify, assess and address potential and actual adverse human rights impacts associated with our supply chain. This review process is ever-evolving as we monitor emerging and ongoing risks and is guided by third party risk intelligence solutions. We anticipate scaling and institutionalizing new learnings and procedures, with the objective of enhancing our supplier

human rights due diligence process.


We also are increasingly seeking to incorporate contractual provisions related to modern slavery and supplier standards within our supplier contracts. Typical clauses include prohibition of certain practices that can create forced labor, for instance, charging of recruitment fees; undertakings to maintain risk management systems to prevent labor exploitation; and notification of instances of labor exploitation along with any remedial action planned or taken.

### **Training**

On a worldwide basis, we regularly train our employees with content specific to recognizing possible signs of slavery and human trafficking and mitigating risks. We comply with Title 14 of the U.S. Code of Federal Regulations Parts 121 and 135, which requires operators to provide flight attendants and certain customer service personnel with training regarding recognizing and responding to potential slavery and human trafficking victims. All of our in-flight and customer service representatives receive such training at least annually. This training equips our frontline employees with the tools and resources needed to identify potential signs of slavery and human trafficking and to react and report potential human trafficking situations to the appropriate law enforcement officials for further investigation.


Approved by the Board of Directors on December 11, 2025

Signed and dated by:



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**Walter Isaacson**  
*Chair of Public Responsibility Committee*



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**Scott Kirby**  
*Board Director and  
Chief Executive Officer*