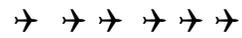


Delta Air Lines



Code of Ethics and Business Conduct

Our Vision, Ethical Principles and Actions

Our Vision	To be the world's greatest airline.
Our Ethical Principles	<ul style="list-style-type: none">■ Act with Integrity. Pursue no business opportunity that would violate the law or Delta's standards of conduct. This begins with our foremost commitment to safety and extends to all other legal and ethical responsibilities, as well.■ Earn the Trust of Our Stakeholders. Deal honestly and in good faith with customers, suppliers, employees, shareowners and everyone else who may be affected by our actions.■ Respect and Support Each Other. Respect the dignity of our fellow employees, recognizing that we gain strength from diversity and inclusiveness.■ Be Loyal. Avoid and disclose any activities that might conflict with our responsibilities to Delta and our customers, and protect Delta's assets.■ Act in a Way We Can Be Proud Of. Only engage in business activities that you would be comfortable with if others knew about them.■ Listen. Provide an environment where individuals can question a Delta practice in good faith without suffering any negative consequences.
Our Actions	<ul style="list-style-type: none">■ Know what's right.■ Do what's right.■ If you are ever unsure, ask.■ Keep asking until you get an answer.

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About the Delta Code of Ethics and Business Conduct

Why Have a Code?

Delta has always followed a policy of conducting its business ethically and in compliance with the letter and spirit of the law. This policy is critical to Delta's international reputation for excellence and integrity.

Laws and standards for business conduct are continually becoming more demanding and complex. A failure to follow legal and ethical standards can expose Delta and its employees to very serious harm – harm to the reputation we all have worked hard to earn, as well as fines and even imprisonment of individuals in some circumstances. In short, acting responsibly is becoming ever more important and requires increasing care.

The Delta Code of Ethics and Business Conduct provides the people of Delta and its subsidiaries and affiliates worldwide with a summary of our standards of business conduct so that each of us understands the basic rules that apply. The Code also describes some of the resources available to help us maintain these standards. In this way, we can help ensure that our actions never fall short of our legal and ethical commitments.

The Code does not alter the terms and conditions of employment outlined in Human Resources Practices Manual 1000. Rather, the Code helps each of us understand what is expected of us to maintain Delta's outstanding reputation for integrity.

Who Should Read and Follow this Code?

All employees of Delta and its subsidiaries, and agents and independent contractors of Delta worldwide, should be familiar with the principles and standards contained in this Code and should follow the Code with respect to their activities on behalf of Delta. Delta subsidiaries will adopt their own codes and reporting procedures for their operations and have their own helplines, but their employees are expected to follow this Code with respect to actions that involve Delta information or assets.

Your Personal Responsibility to Do the Right Thing

It is part of your job to understand and follow the principles and standards of our Code. The Code represents our collective commitment to doing what is right. Members of the Delta team that fail to follow the Code put themselves, their co-workers and the Company at risk. They are also subject to disciplinary action, up to and including termination.

What Are the Responsibilities of those Who Supervise Others? Those who manage or supervise others have an additional responsibility – they must lead by example and ensure that their employees have adequate knowledge and resources to follow the Code’s standards. This responsibility includes monitoring employee compliance, enforcing Delta’s standards and supporting employees who raise questions or concerns in good faith about ethics and compliance.

Does the Code Explain All the Standards I Need to Know? The Code is an important reference guide but cannot describe every law or Delta standard that may apply. Additional standards that may apply to you will be communicated in other ways, and it is the responsibility of each Delta person to learn the laws and standards that apply to his or her job. To learn more about specific ethical or legal standards that may apply to you, see the additional resources identified throughout this document with the  symbol, or ask your manager.

How Can the Code be Amended or Waived? The Code may only be amended by the Delta Board of Directors or a Committee of the Board. Waivers of the Code for executive officers may only be considered by the Board of Directors or a Committee of the Board. Waiver requests for other Delta persons may be made by contacting your manager or HR representative.

Asking Questions and Raising Concerns

The Importance of Speaking Up

Achieving our high standards of ethical and legal conduct is impossible if we do not speak up when we should. That's why, in addition to knowing the legal and ethical responsibilities that apply to your job, you are also responsible for speaking up if:

- You are ever unsure about the proper course of action and need advice.
- You believe that another Delta person has done, may be doing, or may be about to do something that violates the law or Delta's standards of business conduct.

It may seem easier to keep silent or look the other way, but integrity is never something we can afford to "put on hold."

Where to Go for Help

Ethics and Compliance Information on DeltaNet

Delta's intranet site provides information on specific compliance areas as well as links to other sites with related information. It also provides current contact information for departments and individuals mentioned in the Code.

What if I Need to Talk with Someone About an Issue in the Code?

Delta officers, managers and lawyers can provide guidance on the Company's legal and ethical standards, but in most cases the best person to talk to is your own manager or HR representative. However, you are free to seek help from whatever internal source you feel most comfortable with. The most important thing is that you ask the question or raise the concern.

If you ever feel uncomfortable about raising an issue directly with HR or Company management, Delta has created an additional resource that can help: the [Delta Ethics and Compliance HelpLine](#).

Concerns about Officers or Board Members

If you have a concern about an ethics or business conduct issue involving actions of any member of the Board of Directors or any officer, including our Chairman, Chief Executive Officer, Chief Financial Officer or Controller, you should consult our General Counsel or call the [Delta Ethics and Compliance HelpLine](#).

The Delta Ethics and Compliance HelpLine

The [Delta Ethics and Compliance HelpLine](#) operates 24 hours a day/seven days a week. Its sole purpose is to receive questions and concerns about legal compliance, ethics and the Delta standards of conduct described in this Code. Calls to the [Ethics and Compliance HelpLine](#) are answered by The Network, an independent company that helps businesses respond to concerns about unethical and illegal acts. If you wish, your call to the [Ethics and Compliance HelpLine](#) can be made anonymously. The Network has procedures to allow this. Confidentiality will be maintained to the extent consistent with Delta's obligations under law.

Calls to the Ethics and Compliance HelpLine Receive a Prompt Response

The [Delta Ethics and Compliance HelpLine](#) makes every effort to give your call a quick response, especially when circumstances make that important. If an investigation is necessary, we will look into the issue promptly and, if appropriate, ensure that corrective action is taken, including involving the Audit Committee of the Board of Directors to consider complaints of an accounting, auditing or financial reporting nature. The [Ethics and Compliance HelpLine](#) assigns tracking numbers so that employees who do not want to give their names still can check back with the HelpLine to receive a response or provide additional information.

**Retaliation Will
Not Be
Tolerated**

An employee who, in good faith, seeks advice, raises a concern or reports misconduct is following a requirement of this Code – and doing the right thing. Retaliation against such a person will not be tolerated. Delta will take appropriate disciplinary action, up to and including termination, against individuals engaging in any retaliatory conduct. If you suspect that you or someone you know has been retaliated against for reporting possible misconduct, you should contact the [Ethics and Compliance HelpLine](#) immediately.



Question: I have been thinking about calling the [Delta Ethics and Compliance HelpLine](#), but I'm not sure if I should. My supervisor is moonlighting for a competitor and the Code says this creates a conflict of interest question. I think I should tell someone at the Company, but I'm afraid that my supervisor will make my job more difficult for me if I do. What should I do?

Answer: If you call the [Delta Ethics and Compliance HelpLine](#), Delta will look into the situation and will not allow your supervisor or anyone else to retaliate against you. The right thing to do is report your concerns.

Other Places to Go for Information and Advice	If you need more information about something in this Code, you have options. Contact or consult: <ul style="list-style-type: none">■ Your supervisor, manager or other leader in the division, department or unit where you work;■ The Delta Intranet site;■ The Delta Law Department; or■ One of the resources marked by the ⓘ symbol for the Code section you are interested in knowing more about.
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The Delta Ethics and Compliance Program

The Ethics and Compliance Committee

The Delta Code of Ethics and Business Conduct is more than just a description of our standards. It is the centerpiece of a Company-wide compliance program supported by our Board of Directors and senior officers.

Administration of the compliance program is provided by a high-level committee that includes the General Counsel and two Executive Officers. The Committee reports to the CEO and the Audit Committee of the Board of Directors. The General Counsel has been designated by the Board of Directors as the Company's chief ethics and compliance officer.

The Ethics and Compliance Committee oversees Delta's Ethics and Compliance Program. This responsibility includes:

- Monitoring the Company's overall compliance performance;
 - Assigning roles and responsibilities for the program;
 - Monitoring compliance training and communications;
 - Overseeing internal investigation processes;
 - Reviewing disciplinary procedures for Code violations; and
 - Monitoring the operation of the [Ethics and Compliance HelpLine](#).
-

How This Code is Organized: Earning the Trust of Our Stakeholders

**Our
Responsibilities
to Our
Stakeholders**

The many standards that Delta employees must adhere to might, at first, seem like a lot. But thinking about the standards as they relate to our various stakeholders makes these standards easier to understand and apply.

Who are our stakeholders? They are the people whose trust we must have if we are to succeed. The major stakeholders include:

- Our Customers and the Marketplace
- Our Employees
- Our Shareowners
- Our Business Partners
- Our Communities and the Public

This Code is organized to reflect the duties we owe to each of these five groups.

Our Standards – Customers and the Marketplace

Our Commitment

Every day Delta strives to earn its reputation for operational excellence and customer service. We begin with an unwavering conviction that safety – always the first concern of our customers – can never be compromised. We are equally committed to honoring all other legal and ethical standards that apply to customers and the marketplace. We will treat our customers with honesty, fair dealing and respect, and we will compete fairly and in full compliance with laws that protect competition.

Safety

Specific legal requirements apply to many aspects of Delta’s operations in the area of safety, and we are committed to strictly complying with all of these requirements.

But safety is more than complying with the law. It is a Delta core value at the heart of our Company. Delta has therefore adopted many safety requirements that go beyond what the law requires. Delta employees (and those acting on Delta’s behalf) must learn and consistently follow the safety rules – whether required by law or by a supplemental Delta policy – that apply to their jobs. Because the operational environment presents special risks, safety requirements are particularly important for employees in:

- Airport Customer Service
 - Air Logistics
 - Flight Operations
 - In-Flight Service
 - Technical Operations
-



If you have a safety-related question or concern, the Delta Intranet site contains contact information for the safety and compliance personnel in the following departments:

- Airport Customer Service
- Air Logistics
- Flight Operations
- In-Flight Service
- Technical Operations
- Corporate Safety

For any off hours calls, contact the Operations Control Center.

Or, at any time, you may contact the [Delta Ethics and Compliance HelpLine](#) with any safety concern.

**Transporting
Dangerous
Goods**

In addition to rules for the safe operation and maintenance of aircraft, Delta must comply with rules for the safe handling and transportation of hazardous materials and other dangerous items. Many Delta employees – from maintenance personnel to baggage and cargo handlers to ticket agents – must be able to apply these important safety rules, and we must all be vigilant in ensuring strict adherence to them.



If you have a safety-related question or concern about dangerous goods, contact the Corporate Dangerous Goods Management Group or the [Delta Ethics and Compliance HelpLine](#).



Question: Through my position as a Delta gate agent, I have learned that some passengers carry liquid lighter refills and other flammable substances in checked baggage. Is the Company doing anything to prevent or discourage passengers from carrying dangerous goods in checked baggage?

Answer: Yes. Delta has recognized the importance of decreasing undeclared dangerous goods in checked baggage and has taken steps to raise passenger awareness concerning items that may not be safely carried. The steps include making the necessary guidance available to the traveling public through a brochure and information kiosks.

Security

Protecting the security of our passengers, our employees and the property entrusted to us is another critical job for everyone at Delta. Our Company is subject to many laws in this area. Each of us needs to know and follow the laws and Company standards that apply to our job.



If you have a security-related question, call Corporate Security or the [Delta Ethics and Compliance HelpLine](#). Corporate Security's Intranet site contains additional means for communicating with that department.



Question: A ramp agent I work with does not wear his credentials in restricted areas. He has been with the Company for quite a while and I don't want to get him in trouble, but I know this violates Delta policy. What should I do?

Answer: Getting along with co-workers is important, but security rules are critical and must come first. Notify your team leader, station manager or the [Delta Ethics and Compliance HelpLine](#). It is the right thing to do.

Advertising and Promotion of Our Services

Delta’s reputation is our most important asset. To help ensure the ongoing trust of our customers, our marketing, advertising and sales activities must describe our offerings and services legally, fairly and honestly.

All official advertising and promotions must be approved by our management and must always avoid practices that are false, misleading or deceptive. In addition, many Delta employees deal with the public. These employees must be sure that their dealings reflect the highest standards of integrity.

An advantage gained through misrepresentation or exaggeration can jeopardize our continued success. Delta’s reputation is completely in our hands, to be enhanced or damaged by our own statements and actions.

Privacy of Customer Information

Every year, Delta carries over one hundred million passengers. We have a responsibility to protect the privacy of information that our customers entrust to us when they choose Delta as their airline. Employees that do not have a business reason to access this information should never seek to do so, and those that do have legitimate access should take care to make sure that no unauthorized release or use of private customer information ever occurs. Our customers expect no less.

Customer privacy is an important area where legal requirements are still developing – both within and outside the United States. Delta is committed to monitoring evolving privacy standards and may, from time to time, develop additional policies in light of them.

Information Security

All entry points into Delta networks must be protected from unauthorized access. Safeguarding the information of our Company, our passengers, our employees and the property entrusted to us is an important responsibility. Our information security policy and standards are designed to help each of us comply with legal requirements in this area.



If you have a privacy or information security-related question, call the Information Security/Privacy Office (ISPO). The ISPO Intranet site contains additional means for communicating with that department.



Question: I overheard a fellow Reservation Agent provide travel information to a friend regarding the friend’s former spouse. What should I do?

Answer: Notify your team leader, manager, HR Representative or the [Delta Information Security/Privacy Office](#). It is the right thing to do.

**No
Discrimination
Toward
Customers**

Delta has an uncompromising policy never to discriminate against customers on the basis of race, gender, age, national origin, disability, sexual orientation or similar classification. The law mandates this policy – discrimination is not only illegal, it is wrong and will not be tolerated.

 Delta's nondiscrimination policy also includes providing reasonable accommodations to our disabled customers.



For further information on Delta's customer nondiscrimination policy, contact Customer Care.

**The
Government as
Our Customer**

While integrity is key to all our dealings with customers, special rules apply when the Government is our customer. Those involved in bidding on or providing service under a Government contract need to know these rules. Criminal sanctions can apply to violations.

In order to avoid even the appearance of improper conduct in dealing with a Governmental customer:

- Always accurately follow rules for billing the Government.
- Never offer anything of value to, or discuss future employment with, a Governmental official involved in approving or managing a Delta contract with the Government.
- Never seek or accept confidential bid information.



If you have questions about proper business relationships with the Government, contact the Law Department.



Question: A Delta contract is up for renewal with a Government agency. There is a bidding process, but one of the procurement officials involved has worked with us before and says the bidding process is just a formality. He suggests giving us some information just to make sure our bid is consistent with what they are "officially" looking for. He says it's OK because we are clearly the best – this will just make the process go more smoothly. Is this all right? What should I do?

Answer: Accepting this information could be a serious violation of the law subjecting you, the official and the Company to severe penalties. Tell the official that accepting the information would be against Delta policy and ask your manager, the Law Department or the [Delta Ethics and Compliance HelpLine](#) for guidance on additional action.

**Antitrust and
Fair
Competition**

Free competition in the marketplace benefits all of us as consumers and the antitrust laws exist to protect that competition. Delta strongly supports free markets.

While the antitrust laws protect those who compete fairly, they also punish those who cheat with severe criminal fines, high damage awards, and even jail terms for individuals. U.S. antitrust law prohibits any agreement that creates an unreasonable restraint of trade.

Certain agreements almost always violate this law.

Never agree with a competitor to:

- **Fix fares, prices, other terms of sale or commission rates.**

Example: Delta must not agree with another carrier to charge the same fares, travel agent commissions or fees for excess baggage.

- **Allocate or divide up customers or markets we serve.**

Example: Delta must not agree that it will serve one city pair in exchange for an agreement that a competitor will serve a different city pair.

- **Rig a competitive bidding process.**

Example: Delta must not agree with another carrier on the fares or city pairs that it will include in a Government contract bid.

- **Boycott a supplier, customer or distributor.**

Example: Delta must not agree with another airline to refuse to deal with a specific travel agent or ground handling company.

Other agreements may reduce competition and create antitrust issues. **Always consult with Delta's Law Department before entering into any of the following types of agreements:**

- Joint ventures, and marketing, purchasing or similar collaborative arrangements with competitors;
- Exclusive dealings arrangements (for example, contracts that require a company to buy only from Delta); or
- Contracts tying or bundling together different products or services (for example, contracts that require a buyer who wants one product to also buy a second “tied” product).

There are many legitimate reasons why Delta employees may have contact with other airlines, such as trade association conferences or meetings to discuss interline agreements or common airport facilities. However, even the *appearance* of an agreement with competitors can sometimes result in antitrust litigation.

For this reason, you should avoid discussions with any competitor of prices, terms of sale, allocation of markets or customers, competitive bidding processes and similar matters. Before attending any meeting or event at which competitors may be present, be sure you know the antitrust rules that govern your conduct. If you have any doubt, always consult the Delta Law Department for guidance.

In addition to agreements in restraint of trade, the antitrust laws prohibit the actual or attempted "monopolization" of markets through unfair practices. Whether or not a company has "monopolized" a market is typically a complex question, but in any case it is always Delta's policy *not* to engage in unfair competitive practices that are designed to acquire or preserve a monopoly in any market we serve.



Antitrust laws are vigorously enforced. If you have questions or concerns about your responsibilities under these laws, contact your supervisor, the Law Department or the [Delta Ethics and Compliance HelpLine](#).



Question: I am a sales representative at Delta and was invited to play in a charity golf tournament sponsored by an industry association. During the tournament, an employee from another carrier struck up a conversation, complaining that the airline industry would be much better off if we all had higher fares. I ended the conversation right away – but was that necessary?

Answer: You did the right thing in ending the conversation immediately. And you should also report what happened to the Law Department as soon as possible. Employees may never agree with competitors to change a Delta fare. To avoid even the appearance of wrongdoing, always avoid discussions about fares with a competitor, unless there is an authorized business purpose, such as establishing interline agreements. When in doubt about the propriety of any contact with a competitor, always contact the Delta Law Department.

**Unfair
Business
Practices**

Certain forms of business conduct are considered improper and are not consistent with Delta's commitment to integrity. We do not, for example:

- disparage or make false statements about our competitors or their services; or
 - use unfair practices against competitors, such as:
 - ⇒ stealing or misusing competitors' trade secrets,
 - ⇒ cutting off their sources of supply, or
 - ⇒ paying bribes to help our business or to hurt a competitor.
-

**Information
About
Competitors**

In today's complex business environment, it makes sense to learn about our competitors and their services. Gathering publicly available information and using it in conducting our business is generally ethical and legal. Delta is committed to competing fairly and avoiding even the *appearance* of improper agreements and understandings with competitors.

- We are free to gather information about competitors from *public sources* (for example, published articles, advertisements, brochures, the Internet and customer conversations).
 - We must never obtain information about another party through the use of unlawful or unethical means (for example, misrepresentation, deception, theft, spying, bribery or unauthorized disclosures by a competitor's employees or consultants).
-



Question: I am a marketing employee who worked at another airline before coming to work at Delta. At home, I have a box of materials from my former employer that would be very helpful in developing marketing plans for Delta. May I use these in my job with Delta?

Answer: No, you should not use materials from a prior job that may contain confidential information.



Receiving or accepting information from competitors can create the appearance of impropriety. Therefore, you should not accept or exchange such information unless you are certain that your conduct is permissible. If you have any questions, you should contact the Law Department.

**Intellectual
Property,
Copyrights of
Others**

Just as we take care to protect our confidential information, Delta respects the proprietary and confidential information of others. This includes written materials, software, music and other “intellectual property.” Here are some basic rules to follow:

- Do not bring to Delta any confidential information including computer records from prior employers.
- Do not load any unlicensed software on any Delta-owned computer.
- Do not accept or use anyone else’s confidential information except under an agreement approved by the Law Department.
- Only copy documents and materials (including computer software) that are not copyrighted (for example, a Government report) or when we have specific permission to do so.
- Do not include copyrighted materials (for example, portions of audio, video and off the air recordings) in materials you are producing without specific permission from the copyright owner – consult the Law Department on whether “fair use” may allow the use of brief excerpts.



If you have questions about intellectual property or copyright rules, contact the Law Department.

Our Standards – Employees

Our Commitment

Delta is committed to fostering a workplace that is safe and professional and that promotes teamwork and trust. Hostility, harassment, unwelcome sexual advances and other unprofessional conduct are not tolerated – there is no place for them at Delta.

Equal Employment Opportunity

Delta is committed to a workplace that is free from discrimination. This means we will recruit, hire, train, promote and provide other conditions of employment without regard to a person's race, color, religion, sex, age, national origin, sexual orientation, veteran status, citizenship status, marital status, parental status, political affiliation or disability. This includes providing reasonable accommodation for employees' disabilities or religious beliefs and practices.



Delta's equal opportunity standards are described in more detail in the Human Resources Practices Manual.

Harassment- Free Work Environment

Delta will not tolerate discriminatory conduct, jokes, slurs or other remarks that encourage or create an offensive or hostile working environment. Delta's policy covers all kinds of harassment – including sexual harassment and harassment based on race, color, religion, sex, age, national origin, sexual orientation, veteran status, citizenship status, marital status, parental status, political affiliation or disability.

Under the law, sexual harassment is generally defined as either:

- Unwelcome sex-based conduct that is so severe and pervasive that it creates an intimidating, hostile or offensive work environment; or
- Sex-based conduct by someone's supervisor or manager that tangibly affects the employee's job – for example, affects discipline, rejection for promotion, or loss of pay or benefits.

Sexual harassment can occur in a variety of forms. It may include:

- unwelcome sexual advances;
- requests for sexual favors; and

- verbal remarks or physical contact or conduct of an intimate or sexual nature, such as uninvited touching or sexually suggestive comments, that interfere with another person’s work performance or that create an intimidating, hostile, or offensive working environment.

Whatever the form of sexual or other kinds of harassment, Delta takes it very seriously. It simply has no place in our Company and may result in disciplinary action up to and including termination.

**Information
and Reporting
Concerns
About
Harassment**



All complaints of harassment are taken seriously. You should report any harassment that you believe has occurred to your supervisor, your HR representative, the Director of Equal Opportunity or the **Delta Ethics and Compliance HelpLine**. Because of the sensitive nature of harassment complaints, investigations will be as discreet as circumstances permit. Information on a harassment investigation will be communicated only to those who need to know the information. Delta will not tolerate retaliation against an employee because the employee has in good faith reported what he or she perceives to be unlawful harassment.

Delta’s standards on harassment are explained in more detail in the Human Resources Practices Manual and in the Sexual Harassment and Unprofessional Conduct booklet distributed to all Delta personnel.



Question: A co-worker buddy of mine frequently makes comments to a particular female employee about her appearance. It seems to be making her uncomfortable. What can I do about it?

Answer: You can contact your supervisor or one of the other resources described in this section of the Delta Code of Ethics and Business Conduct.

**Health, Safety
and Security of
Employees**

Delta is committed to providing all employees with a safe and secure work environment. Safety rules are not enough, though. To achieve our high standards, every Delta employee must commit to being “safety aware” as we go about our jobs. We comply with all health and safety laws, as well as our own health and safety policies that go beyond what the law requires.

All of our employees and the employees of other companies working on our premises must know the health and safety requirements associated with their jobs (for example, standards set forth in maintenance manuals) and observe safe and responsible work practices such as:

- wearing the required protective equipment while on the job;

- operating machinery and equipment in accordance with all safety rules and procedures; and
- promptly reporting to management any job related injury or illness.

A safe and secure work environment also means a workplace free from violence. Threats (whether implicit or explicit), intimidation and violence have no place at Delta and will not be tolerated.



Delta employees are urged to bring any unsafe practices – including threats or intimidation – to the attention of their supervisor or manager, their local safety committee or the [Delta Ethics and Compliance HelpLine](#).

**Employee
Confidentiality**

Delta believes in respecting the confidentiality of our employees’ personal information. This means that access to personal records should be limited to individuals within Delta who have appropriate authorization and a clear business need for that information. Delta employees who have access to personal information must adhere to the highest standards of confidentiality regarding their use of personal information.

Never provide personal employee information requested by anyone outside of Delta without proper authorization.

Delta’s commitment to employee confidentiality is not a license to engage in inappropriate personal activities at work. Delta’s telephones, email and voice mail systems are for business use. Personal communications should be kept to a minimum. The Company has the right to access and review communications, records and information created at work or with Company resources. This includes Intranet or Internet activity, email, voicemail or telephone conversations.



If you have an employee-related confidentiality question, contact your HR representative, your manager or the Information Security/Privacy Office.

**Community
Activities**

Our Company understands the need for balance between work and personal and family life, and we encourage employees to get involved in their communities. Employees should not, however, impose their personal beliefs or opinions on others at the Company. In your outside activities, it should always be clear that you are speaking your own mind and not speaking for Delta.

**Drugs and
Alcohol in the
Workplace**

Our work requires clear thinking and the ability to react quickly – the safety of fellow employees and our passengers depends on it. Being under the influence of alcohol or drugs, or improperly using medication, diminishes an employee’s ability to perform at his or her best, which is vital to our Company’s mission.

This is why Delta’s rules strictly forbid such abuse of drugs and alcohol. Violations of these rules are taken extremely seriously.



If you observe that another employee’s performance on the job is impaired due to the use of alcohol, drugs or other substances, or that another employee is using alcohol or illegal substances on Delta property, notify a member of management, the HR Department or the [Delta Ethics and Compliance HelpLine](#).

If you would like further information on Delta’s policies on drugs and alcohol, see the Human Resources Practices Manual.



Question: The manager I report to has been coming to work with alcohol on his breath. He doesn’t seem impaired, but I worry that he may be. I am afraid that if I confront him or tell anyone, it may cause a scene or he may try to get me fired. What should I do?

Answer: A safe, secure work environment is absolutely critical to Delta. There is enough evidence to believe a problem may exist, so speak right away with another supervisor, a representative from HR or the [Delta Ethics and Compliance HelpLine](#) who can review the situation. We will not tolerate retaliation against you and we will take steps to protect you from any.

Our Standards – Shareowners

Our Commitment Delta is committed to promoting the interests of our shareowners by working hard to achieve superior financial results. In pursuing this goal, we will protect Delta’s assets and resources, avoid self-dealing and conflicts of interest, and be forthright in measuring and reporting our financial performance.

Insider Trading Federal laws protect the investing public by making it illegal for those with “inside information” to buy or sell securities (stocks, bonds, options, etc.). This important rule applies to all Delta employees and their families.

“Inside information” means information that

- is not available to the public and
- is “material.”

What is material information? If a reasonable investor would be likely to consider the information important in deciding whether to purchase, sell or hold a security, it is material. Material information might include, for example, major route changes, significant new contracts, changes in dividends, mergers and acquisitions, earnings statements and forecasts, regulatory approvals, joint ventures and licensing agreements.

Material information may also be information you obtained confidentially during the course of your work for Delta about another company – for example, a customer or supplier.

If you have knowledge of any of these kinds of information – and the information is non-public – this is inside information, and no Delta employee may buy or sell the relevant securities using it.

Even people outside of Delta who get the information from a Delta employee (an employee’s spouse, friends, broker, etc.), are covered by these federal laws. This means you must never give someone outside the Company a “tip” regarding material non-public information.

Securities law violations are taken very seriously. Violations can be prosecuted even when the amount of money involved was small or the “tipper” made no profit at all. Government agencies regularly monitor trading activities through computerized searches. Violations result in serious civil and criminal penalties against the individuals involved.



If you have questions or concerns about your responsibilities under the insider trading laws, contact the Law Department for further guidance.



Question: One of our suppliers sold Delta computer software systems on a trial-run basis. I have heard that Delta is going to place a large order to buy this company's systems. I bet a lot of other airlines will follow Delta's lead. My brother-in-law invests in tech stocks and knows a lot about them. Can I tell him about this and let him decide whether he thinks this company is a good investment?

Answer: Absolutely not. The information you have about Delta's plans to use this company's product is material non-public information. If you convey it to your brother-in-law, you are violating Delta's policy not to divulge confidential proprietary information. If you or your brother-in-law uses the information to invest, you may also be violating federal insider trading laws and be subject to civil and criminal penalties.

**Investor
Relations and
the Media**

Shareowners, financial analysts, creditors and other members of the public rely on us to provide them with reliable information regarding the Company's operations, performance and outlook. Individuals authorized to speak to investors and analysts on behalf of Delta may not provide them with "special" or favored treatment. Rather, Delta must provide all members of the public with access to the same honest and accurate information.

Only Delta employees specifically authorized to do so may respond to inquiries from members of the investment community (for example, shareowners, brokers, investment analysts, etc.). All such inquiries must be forwarded promptly to the Investor Relations group.

Press inquiries also require coordination. Report these to the Corporate Communications Department.

**Accurate and
Complete
Books and
Records**

Our credibility is measured in many ways – one important way is by the integrity of our books and records. Every employee must help ensure that reporting of business information, computerized, paper or otherwise, is accurate, honest and timely. This includes time sheets, vouchers, bills, payroll and benefits records, regulatory data, performance evaluations and other essential Company information. All employees must:

- follow all laws, external accounting requirements and Company procedures for reporting financial information;
- never deliberately make a false or misleading entry in a report or record;

- never suppress, alter or destroy Company records or documents without authorization; and
- never sell, transfer or dispose of Company assets without proper documentation and authorization, which includes bartering of goods and services.

Delta's policy is to fully and completely comply with all applicable financial reporting and accounting regulations. This also applies to all operating reports or records prepared for internal or external purposes, such as FAA reports, environmental data, quality control reports or sales projections. As a public company, Delta's filings with the Securities and Exchange Commission and its other public disclosures must be accurate, complete, understandable and timely. You may be called on to provide necessary information to assure that these Delta obligations are met. You may also be called upon to provide information to and meet with Delta's Corporate Audit Department or its independent accountants. You must take this responsibility very seriously and provide prompt, accurate and complete answers to internal inquiries and those of Delta's independent accountants. You must not attempt to influence decisions or analyses made by Delta's independent accountants. You are responsible for reporting to your supervisor, the [Delta Ethics and Compliance Helpline](#), Corporate Audit or the General Counsel any questionable accounting, auditing or financial reporting matters that come to your attention.

Alteration, falsification or inappropriate destruction of documents could seriously damage the Company's and the individual's reputation and credibility as well as violate certain laws. Delta's policy is to maintain accurate books and records and comply with all legal obligations relating to the retention of documents. These obligations may arise from a variety of sources including statutes, regulations or court proceedings. There are potential criminal penalties for those who alter or falsify certain records, or destroy documents which are likely to be requested in connection with a government investigation. If you have any questions about retention of documents, contact the Law Department.

Company Time To be successful, we must all make the best use of our time and that of our co-workers. Among other things, this means we should never allow our outside interests to interfere with our job responsibilities, and we should always truthfully and accurately report our work hours.

Company Property You are responsible for using good judgment to ensure Delta's assets are not misused or wasted. Company assets are intended to help achieve business goals. Careless, inefficient or illegal use of Company property hurts all of us. You may not take for yourself personally opportunities that properly belong to Delta. You may not use corporate property, information or position for personal gain nor compete with Delta. These rules exist because you owe a duty to Delta to advance its legitimate interest whenever the opportunity to do so arises.



For more information on Delta’s policies regarding the use of Company property, see the Human Resources Practices Manual.

**Delta’s
“Proprietary”
Information**

The non-public ideas, concepts and information we produce are valuable “proprietary” assets. “Proprietary” means Delta owns these assets, much like other kinds of property, and various laws allow us to protect them from use by those outside the Company. Examples of proprietary information are Delta’s:

- customer, sales, marketing and other corporate data bases,
- marketing plans,
- employee personnel records,
- research and technical data,
- business ideas, processes, proposals or strategies,
- actual or potential patents, copyrights or trademarks, and
- computer software.

All of us must protect the confidentiality of proprietary information. This helps make sure that we, as a Company, will reap the benefits of our own hard work.

There are times when sharing proprietary information with persons outside the Company is appropriate, for example so that a consultant the Company has hired can assist us. However, such disclosures may only be made with management’s prior approval. Under some circumstances, a written confidentiality agreement may be required.

**Computer and
Network
Security**

All information networks, whether they are owned by Delta, provided for Delta by third parties or open to the public, must be protected from unauthorized access. Information networks include, but are not limited to, intranets (like the DeltaNet), local and wide area networks (“LANs” and “WANs”) that are dedicated to connecting multiple computers over relatively shorter or longer distances, and virtual private networks (“VPNs”) that allow remote access to a company’s computer systems using the Internet. While most networks have some level of security to prevent unauthorized access, network information security is not a substitute for security steps that users or administrators of desktop workstations, servers or host processors must employ, such as passwords, IDs and physical access controls. Additional security considerations include:

- Wireless networks are to be considered inherently unsecure and as such, use for confidential business purposes should be limited and appropriate controls must be employed.
- All entry points into Delta networks must be protected from unauthorized access.

- The addition or installation of any hardware or software with network monitoring capability is prohibited unless prior approval has been obtained in accordance with specified procedures.
-



Questions relating to information security should be addressed to the ISPO or you may call the [Delta Ethics and Compliance HelpLine](#).

**Company
Funds**

How we use Company funds impacts our profitability, so follow a simple rule: protect Delta's funds as you would your own, guarding against misuse, loss or theft. This includes making sure that all claims, vouchers, bills and invoices are accurate and proper.

Company funds include both cash and its equivalents, such as currency, checks, postage, charge cards, bills, vouchers and reimbursement claims.

**Preventing
Booking and
Ticketing
Fraud and
Abuse –
(Special
Reporting
Options)**

As an airline, one critically important way to protect our shareowners is to prevent ticketing and booking abuse. Delta's Revenue Protection Unit (RPU) has been created for this purpose. RPU conducts fraud prevention programs and investigates improper or fraudulent booking, ticketing and SkyMiles program activities. If you would like to report suspected activity of this kind, you can do so anonymously by contacting the RPU.



You can visit the RPU website where you will find information on detecting and preventing ticketing fraud/abuse as well as forms to use for reporting such activity.

Our Standards – Business Partners

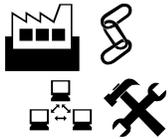
Our Commitment

Delta has many kinds of business partners and suppliers, and they are vital to our success. Therefore, we want to be sure that our relationships with them are based entirely on sound business decisions and fair dealing.

Conflicts of Interest

It is very important that we be loyal and objective toward our common purpose of advancing Delta's interests. We all have lives outside the Company, but our outside activities should never interfere with our responsibilities to Delta. A "conflict of interest" arises when your personal, social, financial or political activities have the potential of doing just that – interfering with loyalty and objectivity to the Company. Actual conflicts must be avoided, but even the appearance of a conflict of interest can be harmful, too.

In some cases, the activities of a close relative, such as a spouse, can also create a conflict of interest. This is because the employee's loyalty may become divided – or may appear to be divided – between loyalty to the close relative (and that person's interests) and loyalty to Delta (and the Company's interests).



Here are some examples of areas where conflicts of interest arise.

- **Outside Employment and Affiliations.** As a general rule, Delta does not prohibit employees from working for other organizations – but doing so must never interfere with an employee's responsibilities to Delta. A second job with an organization that is a Delta competitor, commercial customer or supplier of goods or services raises an actual or possible conflict. The same applies to working for an organization that is seeking to become a competitor, customer or supplier. When in doubt, always discuss outside employment with your manager or HR representative first.

We do not generally restrict employment of your relatives, except for one obvious rule: a relative may not have any business dealings with you, with anyone working in your business unit or with anyone who reports to you. You must also be especially careful not to disclose any Delta business information to the relative.

Occasionally, Delta employees are asked to serve on the board of directors of another organization and this can, in some cases, raise conflicts of interest or even legal issues. If you receive such an invitation and have any questions regarding a possible conflict, you should check with your manager or HR representative who will obtain a resolution for you.



Investments. You (and your immediate family members, such as a spouse or child) need to be careful that investments do not create conflicts of interest. Conflicts can occur if investments are made in competitors, suppliers or customers.

Investments of this kind may impair your ability to make objective decisions on behalf of the Company.

The following guidelines will help you deal with investment situations that are especially likely to raise potential conflicts issues:

- Investments in a supplier that is a privately-owned company are not allowed if you are involved in the selection or assessment of, or negotiations with, the supplier, or if you supervise anyone who has such responsibility.
- Investments in a customer that is a privately-owned company (or is a publicly-traded company if the investment is 1% or more of any class of securities) are not allowed if you are responsible for dealings with that customer or supervise anyone with such responsibility.
- Investments in a privately-owned company that provides services that compete with any of Delta's businesses are not allowed.
- Investments in a publicly-traded company that is a supplier or competitor of Delta are not allowed if the investment is 1% or more of any class of securities listed on any of the national securities exchanges or regularly traded over the counter. Investments of less than 1% will ordinarily not be prohibited in the absence of other complicating factors which might indicate that a conflict is present.

Usually, whether an investment creates a conflict of interest is a matter of good judgment. When deciding whether an investment might create a conflict, ask yourself these questions:

- Would the investment affect any decisions I will make at Delta?
- How would the investment seem to others inside of Delta, such as my co-workers – would they think it might affect how I do my job for the Company?

- How would it look to someone outside of Delta, such as a Delta customer or shareowner or even the newspaper?

Note: Investments in publicly-traded mutual funds, index funds and similar poolings of securities when the individual investor has no say in which investments are included usually do not present conflicts.



If you think you may have a conflict of interest, or that others could possibly perceive an activity or relationship you are engaged in as a conflict of interest, you must promptly disclose this to your manager or your HR representative. If you believe someone else may have an actual or potential conflict of interest, you must also promptly disclose this to your manager or HR. HR will coordinate resolution of the conflict. Alternatively, you can report actual or potential conflicts of interest to the [Delta Ethics and Compliance HelpLine](#).

Employees in Supply Chain Management have additional rules for avoiding or resolving conflicts of interest. If you are an SCM employee, make sure you know and follow these rules.



Question: The owner of a travel agency wants to hire me to do some work in my spare time. Can I take this part-time job?

Answer: You should discuss this with your manager or HR representative, as the answer depends on many factors including your position with Delta, the position you would hold with the agency, and Delta's relationship with the agency. Obviously, even the appearance of favoritism could hurt our relationships with other agencies that do not employ Delta personnel.

Receiving Gifts and Entertainment



Business gifts and entertainment can build understanding and goodwill, but they can also make it harder to be objective about the person providing the gift or entertainment. In short, they can create their own “conflicts of interest.”

Delta employees should not accept lavish gifts or entertainment. Employees are expected to exercise good judgment in evaluating whether particular gifts or entertainment are appropriate. For example, an occasional meal with a business partner, tickets to ordinary sports, theater or other cultural events or promotional items such as pens, calendars and coffee mugs are generally acceptable.

Other types of gifts and entertainment give rise to such concerns, either in fact or in appearance, that they are never permissible. As a Delta employee, you may never:

- Accept any gift or entertainment that would be illegal or result in any violation of law
- Accept any gift of cash or cash equivalents (such as gift certificates, loans, stock or stock options)
- Accept anything as a “quid pro quo,” or as part of an agreement to do anything in return for the gift
- Participate in any entertainment with a supplier that is unsavory, sexually oriented or otherwise violates Delta’s commitment to mutual respect
- Accept any gift or entertainment that violates more restrictive standards set by your own department (see below)
- Participate in any activity that you know would cause the person giving the gift or entertainment to violate his or her own employer’s standards
- Solicit a gift or contribution from a supplier

In exercising your judgment about other gifts, consider questions such as:

- Would the gift or entertainment be likely to influence the recipient’s objectivity?
- Does it serve a business purpose (for example, will business be discussed as part of the event in question)?
- What kind of precedent would it set for other employees?
- How it would appear to other employees or people outside of Delta?

If you have any doubts about the appropriateness of a gift or entertainment, check with your HR representative.



Department heads may adopt from time to time monetary limits on gifts and entertainment or categories of pre-approved gifts and entertainment. You should ask whether your department has adopted any such limits or categories.

Supply Chain Management has additional rules regarding gifts and entertainment. If you are an SCM employee or are involved in the selection or assessment of a supplier, make sure you are familiar with these rules.



Question: A supplier's sales representative offers you a cleverly designed pen that his company uses in signing contracts, but there is one catch to the offer. He says you may have the pen only if you help him make his case to the rest of the procurement team. Since the pen has a nominal value, can you accept it?

Answer: No, because there is a "quid pro quo," a Latin expression meaning "something for something." He will give the pen to you only if he gets something in return. Even though this may seem like a small matter, quid pro quo arrangements such as this are on the list of conflicts that are "never OK."

**Offering Gifts
or
Entertainment**

Just as we have strict rules for *receiving* gifts and entertainment, we must be careful in how we *offer* them, too. Offering social amenities or business courtesies of a nominal value, such as modest gifts, meals and entertainment, is a common practice in the commercial world meant to create goodwill and enhance business relationships.

Using good judgment and moderation, occasionally exchanging entertainment or gifts of *nominal value* with a non-Governmental individual or entity is appropriate unless the recipient's employer forbids the practice – any courtesy should always comply with the policies of the recipient's organization. Government officials operate under strict legal requirements which may prohibit their acceptance of gifts or entertainment of even nominal value.

Some things are always off limits, and there are no exceptions. No offer, gift, entertainment or anything of value may be given if it is:

- Illegal;
 - In violation of the rules of the recipient's organization;
 - A quid pro quo (offered for something in return); or
 - Not properly accounted for by Delta.
-

Our Standards – Communities and the Public

Our Commitment Delta is committed to being a positive contributor to the communities in which we do business. We will act as stewards of the environment, follow our integrity-based values when we do business abroad and participate in the political process only in lawful ways.

Environmental Compliance and Excellence Delta is committed to doing more for the environment than simply complying with legal requirements. Compliance with laws is the foundation of our environmental commitment, but Delta is aiming higher. We want our Company to be known for environmental excellence.

Delta's environmental compliance and excellence initiatives include:

- training Company employees and the employees of other companies working on our premises to work in an environmentally responsible manner;
- managing solid and hazardous waste by recycling and using non-hazardous chemicals where feasible;
- minimizing the impact of waste materials on the environment through effective controls; and
- auditing our environmental performance to confirm that we meet our commitments.

This commitment, in turn, requires Delta people to:

- know the environmental responsibilities of their jobs – these are based on local, state and federal environmental laws, international standards where we operate abroad, and the Company's own standards for environmental protection;
- actively participate in their location's environmental program by following specified procedures and notifying management of situations that are potentially damaging to the environment; and
- understand that our goal is to move toward environmentally sustainable practices wherever feasible – this means being sensitive to environmental issues and finding ways to improve our environmental performance even where the law does not require it.



If you have questions or concerns relating to Delta's environmental compliance requirements or activities, contact Delta's Environmental Services Department or the [Delta Ethics and Compliance HelpLine](#).



Question: We use a contractor to dispose of spent oil. I know the contractor's crew chief and I get the feeling that they may not be disposing of the oil the right way, at least not according to what the law says. Should I care about this? After all, it's not my company. And it is just dirty oil – not some toxic substance. They are probably saving everyone money.

Answer: Yes, you should care. What the contractor is doing might even make our Company liable. But even if we aren't liable, we still care. Doing things the right way means not looking the other way if you have any reason to think someone we work with is doing something wrong. And we should never "second guess" the law. Environmental laws exist for a reason. Not all substances are equally harmful, but all must be properly disposed of. Do the right thing. Talk with your supervisor, Environmental Services or the [Delta Ethics and Compliance HelpLine](#).

**Political
Activity**

The law sets strict limits on contributions by corporations to political parties and candidates, and violators are subject to very serious penalties – including imprisonment in the case of individuals.

To ensure we remain in compliance with these laws, no employee may make any direct or indirect political contribution on behalf of Delta unless authorized in writing by the Company's Chief Executive Officer or the Senior VP - Government Affairs. This includes contributions to candidates, office holders and political parties. Contributions can include such things as:

- purchasing tickets to political fundraising events;
- furnishing Delta goods or services;
- loaning Delta personnel during working hours for fundraising activities;
- paying for advertisements and other campaign expenses; and
- reimbursing political expenses.

Delta encourages political activity by employees in support of candidates or parties, but such activity must occur strictly in an individual, voluntary and private capacity. Never engage in personal political activity on Company time or use Delta property or equipment for this purpose. Remember, even the appearance of a contribution of Delta time or resources can be viewed as a violation, so be careful to separate your own political activities from Company activities.



If you need further information on authorized political activities, contact Delta's Government Affairs Office.



Question: I am running for the local school board. I want to use the office copier to make copies of my campaign flyer. Is that OK ?

Answer: No. Company property and equipment may not be used for a political purpose. Running for a public office, even the school board, is a political purpose.

**International
Bribery and
Corruption**

The U.S. Foreign Corrupt Practices Act and similar foreign laws prohibit bribes to foreign Government and other officials (such as political candidates, employees of Government-owned businesses and UN officials). A violation can be a serious criminal offense for both the Company and the individual.

- The Act applies to the Company and its subsidiaries as well as their employees, agents and representatives worldwide.
- The Act forbids offering or giving *anything* of value to a foreign official for the purpose of obtaining or retaining business, or for any other improper purpose.
- The Act requires the Company to keep accurate books and records to ensure payments are honestly described and not used for unlawful purposes.

Delta requires more – we prohibit bribes to anyone, anywhere in the world, for any reason.

To ensure your compliance with this law, remember that it is your responsibility to avoid these prohibited actions.

Never:

- make an unauthorized payment (cash or otherwise) to a foreign official;
 - induce a foreign official to do something illegal;
 - establish an unrecorded fund for any purpose;
 - issue a check or draft without accurate documentation;
 - make a false entry in Company books;
 - do anything to induce someone else to violate these rules; or
 - look the other way when there might be a violation.
-



If you need further information, contact the Law Department.



Question: I was told that I could hire a consultant to take care of getting all the permits we need from a foreign Government. He requested a \$40,000 retainer and said that he would use the money to “help move the process along.” Since we don’t really know where the money is going, do we have to worry about it?

Answer: Absolutely. You must know where that money is going and for what purpose it is being used. Moreover, the Company is required to take steps to ensure that this money is not used as a bribe. You must seek the advice of your manager or ask the Law Department.

**Embargoes,
Economic
Sanctions and
Antiboycott
Laws and
Regulations**

The U.S. Government maintains embargoes and economic sanctions against some countries. It also has laws and regulations designed to prevent U.S. persons and companies from taking actions that will further any boycott in which the U.S. does not participate, such as the Arab League embargo of Israel.

The Office of Foreign Assets Control ("OFAC") of the Treasury Department is the principal agency through which the U.S. Government imposes economic embargoes on other countries, including prohibitions on financial transactions, investment and imports/exports. It may impose sanctions on specific types of transactions and activities or on all economic transactions and activities relating to a designated country. These sanctions not only may affect trade with the designated country, but also may prohibit transactions with individuals or business entities, wherever located, who or which are deemed to be owned or controlled by the designated country's government. The sanctions generally apply to the conduct of U.S. natural persons and business entities, as well as to subsidiaries of such companies, regardless of their location. The restrictions generally cover a broad range of activities and often include prohibitions on transportation and travel-related activities.

The Department of Transportation, Transportation Security Administration and Federal Aviation Administration have sanctions restricting certain activities related to transportation that can apply both to activities that occur within the United States and activities abroad of U.S. persons and business entities, and subsidiaries of U.S. companies.

The Bureau of Industry & Security ("BIS") of the Commerce Department has regulations which restrict the export and re-export of U.S. origin goods and technology to certain countries. The BIS rules apply not only to U.S. persons, but also to foreign persons who acquire U.S. goods or technology abroad.

Because the kinds of activities that are regulated vary greatly from country to country and from time to time, it is very important that the particular sanctions requirements for each country are considered closely when engaging in any transaction pertaining to transportation involving a country against which the United States applies economic sanctions. Business units should consult with the Law Department for appropriate guidance.

**Government
Inquiries or
Investigations**

Because our Company is in an industry that is heavily regulated, from time to time Delta personnel may come into contact with Government officials responsible for enforcing the law. Dealing honestly with Government officials is critical.

If circumstances arise involving contact with Government officials with respect to your duties at Delta, any information provided must be honest, and you must avoid falsification of any kind.

At the same time, care must be taken in dealing with any representatives of Government agencies to ensure that all appropriate steps are taken and that Delta's legitimate interests are protected. Accordingly, you should always check with the Law Department and obtain advice before responding to a request for information from a Government agency other than a routine inquiry. As noted earlier, there are potentially harsh criminal penalties for those who alter or falsify certain records, or destroy documents that are likely to be requested in connection with a government investigation. If you have any questions about the retention of documents, contact the Law Department.
