



AMERICAN EXPRESS SUPPLIER CODE OF CONDUCT

American Express is a global company that is committed to working with suppliers that adhere to the same standard of ethics, legality, and integrity as American Express does. We value responsible business practices and a commitment to following these practices.

We seek to provide the world's best customer experience, which at times includes relying on services provided by thousands of suppliers worldwide. The American Express Supplier Code of Conduct outlines the expectations that American Express has for its suppliers and will apply to any employee, agent, contractor, or other representative of any supplier that provides goods or services to American Express. To ensure the awareness of the Supplier Code of Conduct, suppliers are responsible for reviewing, communicating, and sharing these expectations and principles, with all associations to the supplier.

Scope

A supplier is any third party that furnishes goods and/or services to American Express, including those that perform functions on our behalf or that provides benefits and services to our prospects and/or customers. The following persons, entities, and organizations (collectively referred to as Suppliers) are covered by the Supplier Code of Conduct and are thereby subject to its provisions:

- Suppliers, vendors, providers, consultants, agents, contractors, temporary workers; and
- The owners, officers, directors, employees, consultants, affiliates, contractors and sub-contractors of these organizations and entities.

American Express is committed to working with a wide array of suppliers and partners, including small businesses, who share our values and enable us to achieve our business objectives.

American Express's Supplier Code of Conduct consists of the following areas of focus:

1. Compliance with the Supplier Code of Conduct
2. Business Practices & Ethics
3. Environmental Sustainability
4. Reporting Concerns

1. Compliance with the Supplier Code of Conduct

Suppliers and their sub-contractors must follow the Supplier Code of Conduct when conducting business with American Express or on behalf of American Express to maintain the highest standards of integrity. Any violation of this Supplier Code of Conduct may require corrective action plans or may result in disciplinary action up to termination of contract. Suppliers must be forthcoming and transparent about any situation that may arise that could jeopardize or violate the Supplier Code of Conduct

set below through the appropriate channels or the supplier's designated point of contact at American Express. The Company prohibits retaliation against anyone who makes a good faith report of a suspected violation of the Supplier Code of Conduct.

2. Business Practices & Ethics

American Express respects and promotes human rights and is committed to responsible workplace practices across our company and in all aspects of our business. We strive to conduct our business in an approach consistent with the United Nations Guiding Principles on Business and Human Rights as shown in our [Code of Conduct](#). Our Supplier Code of Conduct aims to embody the same level of values from our suppliers, with a commitment to fair and equal treatment of all persons and to conducting business in an ethical manner.

2.1 Conflicts of Interest

American Express expects our suppliers to disclose any actual, potential, or perceived conflicts of interest before starting their relationship with us or as soon as they become aware of a conflict(s) after beginning the relationship. Suppliers, their employees, and family members cannot receive improper benefits through their relationship with American Express or allow other activities to conflict with acting in the best interests of American Express.

2.2 Anti-Trust

American Express supports vigorous yet fair competition. Organizations must all abide by competition laws (also referred to as "antitrust," "monopoly" or "cartel" laws), which are designed to preserve free and open competition. American Express expects suppliers to conduct business in full compliance with fair competition laws that are applicable to the jurisdiction in which they operate and conduct business. These laws vary, but their common goal is to promote a competitive marketplace that provides consumers with high-quality goods and services at competitive prices. Antitrust and fair competition laws prohibit us from sharing pricing and other competitive information with competitors and other third parties, and therefore, we expect our suppliers to comply as well.

2.3 Anti-Corruption

American Express has adopted a zero-tolerance policy prohibiting bribery, regardless of location. Suppliers may not give or receive anything of value – meals, gifts, entertainment, travel, job opportunities, contracts, incentives, or other benefits or favors – with the intent to improperly obtain or retain business, secure services, influence any decision or obtain an improper business advantage for American Express. We expect our suppliers to comply with all applicable laws, regulations, and government-issued rules and guidance.

2.4 Customer Facing Interactions

All Customer Facing Interactions, such as sales, marketing, advertising, servicing, and collections activities must be always conducted with honesty and integrity. This applies to all interactions with customers including current and prospective clients and merchants.

Suppliers and their subcontractors must meet the appropriate legal and regulatory expectations applicable to the service they are providing, including sales, referral, compensation, incentive guidelines, and relevant procedures.

2.5 Meals, Gifts, Entertainment and Other Benefits

When doing business on behalf of American Express, the supplier must be cautious when offering, giving or accepting meals, gifts, entertainment, contracts, incentives, or other benefits to or from anyone who does or seeks to do business with your Company. Doing so may influence, or appear to influence, the ability to make objective business decisions. In addition, you may not solicit any meals, gifts, entertainment, or other benefits from current or potential customers or other business partners.

The supplier may never accept or offer gifts that are: Cash or monetary equivalents, such as gift cards or vouchers, objects that have significant value, or may appear significant to others, indicative of preferential treatment. In addition, we may never accept or offer entertainment that is excessive in value, not business-related, and in an inappropriate setting.

2.6 Political Activities and Lobbying

Supplier must never use its position of authority to make another colleague feel compelled or pressured to participate in any way in any political event or cause, or for any political purpose.

The U.S. Federal Government, each state, and certain localities, have laws requiring registration and reporting by lobbyists and, in some cases, by the lobbyists' employers. Lobbying activity generally includes attempts to influence the passage or defeat of legislation. The U.S. Government and many states and localities, however, have extended the definition of lobbying activity to cover efforts to influence formal rulemaking by executive branch agencies or other official actions of agencies, including the decision to enter into a contract or other financial arrangement. Moreover, "grassroots" activity is in many cases also considered lobbying activity.

Governments in certain other jurisdictions may have similar laws, with which Suppliers must comply.

To ensure that American Express and its Suppliers are in compliance with these laws, Suppliers may not engage in any of the lobbying activities, as described above, or retain any other person or entity to do so, on behalf of American Express without prior approval of the appropriate contact, and must be in full compliance with applicable international, federal, state, and local laws.

Attempts to obtain business or contracts from a governmental entity should be done in consultation with the appropriate contact. Any corporate donations to government entities, which may be viewed as lobbying require prior approval of the relevant contact details.

2.7 Intellectual Property

American Express values its intellectual property and recognizes it as an important asset to our business. Suppliers are expected to protect all American Express intellectual property with the same care and protection in which the supplier would safeguard their own information. We expect all suppliers to comply with all applicable rights and laws with regards to intellectual property and the use of the information provided from American Express.

2.8 Privacy, Data Protection & Management

Suppliers of American Express must handle all data, sensitive information, confidential information, personal information, and business records with care and in accordance with data privacy laws and regulations.

Written and electronic records should be properly identified, retained, and disposed of according to legal, regulatory, and contractual expectations. All records that relate to any imminent or ongoing investigation, lawsuit, audit, or examination involving American Express- related business should not be destroyed, concealed, or altered to impede the proceedings.

All applicable litigation hold instructions should be applied immediately and consistently.

2.9 Labor and Human Rights

American Express is committed to upholding and protecting human rights around the world. American Express expects its Suppliers to take necessary steps to prevent acts of forced labor and human trafficking from occurring both within our business and our supply chain by ensuring we only work with Suppliers of the highest standard.

Suppliers should sustain a workplace environment where business standards are clearly understood and provide clear channels for individuals to communicate and make good faith report of suspected violations without threat of retaliation. Our company strives to provide a safe, diverse, and equal opportunity workplace, and inhumane practices of forced labor within both American Express and within our Suppliers will not be tolerated.

Our [Human Rights Statement](#), [Code of Conduct](#) and [Australian Modern Slavery Statement](#) also express our commitment to fair and equal treatment of all people.

2.10 Anti-Discrimination

American Express is an equal opportunity employer and makes employment decisions without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, veteran status, disability status, age, or any other status protected by law. American Express aims to create a workplace where colleagues do not feel harassed or discriminated against based on any protected characteristic. Our suppliers must not engage in unlawful discrimination in the workplace.

3. Environmental Sustainability

3.1 Greenhouse Gas Emissions

American Express is focused on efforts to minimize our carbon footprint. We will also work with our suppliers and encourage them to reduce their impact on our value chain by inviting them to track, reduce, and eventually neutralize their own operational greenhouse gas emissions.

Suppliers should work towards calculating and reporting their relevant scope 1, 2 and 3 emissions on a yearly basis. Suppliers should aim to provide accurate emissions data to American Express upon request through preferred methods and channels (e.g., CDP). American Express's Suppliers are encouraged to set science-based net-zero targets in alignment with the Science Based Targets initiative and share those targets and boundaries with American Express, when they are publicly announced.

3.2 Paper Statement

American Express continues to source its direct marketing, customer communications, and office paper from certified responsibly managed forests, including by the Forest Stewardship Council, Sustainable Forestry Initiative, and Programme for the Endorsement of Forest Certification. We expect our suppliers to source paper from certified responsibly managed forests where applicable.

3.3 Waste/Water

We encourage all suppliers, where applicable, to reduce their waste and water consumption and to track and manage this to the best of their ability.

4. Reporting Concerns

American Express expects suppliers to maintain reporting and grievance mechanisms for their employees to report concerns relating to the topics discussed in this Supplier Code of Conduct.

In addition, if a supplier or supplier employee believes that an American Express employee or another supplier or supplier employee providing services to American Express has engaged in conduct in violation of this Supplier Code of Conduct or our American Express [Code of Conduct](#), they are expected to promptly report those concerns by telephone or through our web portal to the [Amex Ethics Hotline](#), anonymously if preferred. American Express strictly prohibits retaliation for reporting concerns in good faith.