



**GLOBAL  
BUSINESS  
TRAVEL**

# **Anti-Bribery & Anti-Corruption Shared Values**

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# American Express Global Business Travel

## *Anti-Bribery and Anti-Corruption Shared Values*

### INTRODUCTION

American Express Global Business Travel (“GBT”) is committed to the highest standards of integrity and business ethics both in its operations and in those of non-GBT persons and entities that provide goods and services to or on behalf of GBT (“Third Parties”). GBT’s Anti- Bribery and Anti-Corruption Shared Values (“Shared Values”) provides Third Parties with an overview of the ethical standards that are important to GBT.

Third Parties are encouraged to share this document and ensure they adhere to its principles in all business dealings for and on behalf of GBT. Third Parties are also expected and required to conduct business in accordance with all applicable laws, rules and regulations. If Third Parties find themselves in a situation where customary conduct is at odds with these Shared Values, and/or local laws or regulations, they are expected to comply with the more stringent standard.

## **ANTI-CORRUPTION**

GBT prohibits bribery of any kind, including commercial bribery, and has adopted a zero tolerance policy for bribery in all its operations and activities. This means GBT and Third Parties that provide services to and/or act on behalf of GBT may not engage in any form of bribery, including offering, soliciting or accepting anything of value, directly or indirectly, that is given with the intent to obtain or retain business or an improper advantage or to secure services. There is no exception for small amounts.

If Third Parties interact with government officials (including officials of international organizations and political parties, as well as employees of state-owned companies) in the course of providing services to and/or acting on behalf of GBT, then Third Parties must be especially cautious. Third Parties may not offer or promise anything of value to influence the actions or decisions of, or to obtain any improper advantage with, government employees or the government bodies they may influence.

## **EXPEDITING PAYMENTS**

Expediting payments (also known as “facilitation” or “grease” payments) are payments made to speed up or secure the performance of a routine government action, such as visa processing or customs clearance. These payments are considered illegal bribes in many jurisdictions, including those with laws applicable to GBT. Third Parties may not make any expediting payments to government employees on behalf of or in connection with services performed for GBT, no matter where the Third Party is conducting business. This is true regardless of local customs in the locations where the Third Party conducts business.

## **GIFTS AND ENTERTAINMENT**

In connection with their engagement with GBT, Third Parties should be cautious when giving gifts or entertainment to, or accepting gifts or entertainment from, anyone who does or seeks to conduct business with the Third Party. Giving or accepting gifts and entertainment may appear to influence the recipient’s ability to make objective business decisions. Third Parties may provide and accept meals, entertainment, token gifts or favors that have a valid business purpose, do not have significant value and do not create a real or apparent sense of obligation.

In some countries, it is traditional to present gifts to business associates to demonstrate courtesy or appreciation. Third Parties may never offer gifts to government officials with whom they are conducting or seeking to conduct business on behalf of GBT or before whom they are representing GBT. As appropriate, and consistent with these Shared Values, Third Parties may give gifts to non-government officials in locations where doing so is customary, widely accepted and consistent with local laws, rules and regulations and permitted by the Third Party’s policies. Such gifts must be of reasonable value and properly reported.

## **BOOKS AND RECORDS & FINANCIAL STATEMENTS**

Reporting accurate, complete and understandable information about the Third Party’s business, earnings and financial condition is one of the most important duties. Third Parties should ensure that their accounting and financial records meet the highest standards of accuracy and completeness. Third Parties must never make any false or artificial entries in the Third Party’s books and records related to their engagement with GBT.

Third Parties should record financial transactions accurately, completely, fairly, and in a timely and understandable manner. Third Parties must ensure that the data they provide to GBT for the preparation of financial statements, regulatory reports and publicly-filed documents complies with all applicable accepted accounting principles and the Third Party’s internal control procedures.

If a Third Party has reason to believe that any of the Third Party’s books or records related to GBT are being maintained in a fraudulent, inaccurate or incomplete manner, or feels pressured to prepare, alter, conceal or destroy documents, he or she should report these concerns immediately to GBT.

## WHERE TO SEEK HELP AND REPORT CONCERNS

Third Parties may, at times, encounter situations in which the right choice is not perfectly clear. If a Third Party has reason to believe that anyone in his or her company working on behalf of GBT, may have engaged in ethical or legal misconduct, or thinks that he or she may have knowingly or unknowingly engaged in misconduct, the Third Party should report such concerns.

If you need to ask for help or voice a concern, many entities have the following resources where you can turn: compliance officers, human resource representatives, legal departments and internal audit groups.

If you wish to have an off-the-record, confidential conversation regarding knowledge of, or information about, any violation of law, regulatory compliance, or GBT policies; practices that vary from accepted standards for financial or business process controls; or inappropriate treatment or behavior from a GBT employee, you may contact the GBT Ethics Helpline ([www.gbt.ethicspoint.com](http://www.gbt.ethicspoint.com)). You may also contact a GBT Regional Compliance Officer or GBT Risk & Compliance ([gbtcompliancerisk@amexgbt.com](mailto:gbtcompliancerisk@amexgbt.com)).