

AMERICAN EXPRESS GLOBAL BUSINESS TRAVEL

SUPPLIER RESPONSIBLE BUSINESS SHARED VALUES¹

Introduction

At American Express Global Business Travel (“GBT” or the “Company”), we believe that the Company, its employees, and those acting on our behalf must engage in the highest standards of ethical and transparent business practices, implement corporate social responsibility throughout their organization, and comply with all applicable laws and regulations in locations we operate. In support of this belief we have adopted numerous policies, procedures and guidelines to assist employees, partners and suppliers to drive compliance with our standards.

GBT is a signatory to the United Nations Global Compact and is committed to its ten principles on human rights, labor standards, the environment and anti-corruption. GBT strives to actively promote ethical, social, and environmental best practices within its own business and among its supply chain. The Supplier Responsible Business Shared Values (“Shared Values”) outlined herein focuses on advancing these best practices throughout our supply chain.

The primary objective of this document is to enable suppliers doing business with or in consideration of doing business with GBT (“Suppliers”) to support, commit to and adhere to these Shared Values.

Compliance and Ethics

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. These Shared Values provide Suppliers with an overview of the ethical standards that are important to GBT. Suppliers and their employees must abide by these Shared Values in all business dealings for and on behalf of GBT.

In addition, Suppliers are expected and required to conduct business in accordance with all applicable laws, rules and regulations including, without limitation, laws related to: confidentiality, competition, money laundering, anti-bribery, trade sanctions and data protection laws. If Suppliers 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.

Conflicts of Interest

Suppliers may not offer business opportunities, fees, commissions or other advantageous financial arrangements to any GBT employee. In addition, Suppliers may not offer to any GBT employee the purchase for personal use, of the Supplier’s goods or services on terms other than those available to the general public or established by company policy. Gifts and entertainment that are not reasonable, appropriate or consistent with GBT’s Gift and Entertainment policy will not be accepted by GBT.

Human Rights

GBT’s commitment to respecting human rights wherever we operate is embodied in our Code of Conduct and is consistent with the spirit and intent of the United Nations Universal Declaration of Human Rights; the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, where applicable to business;

¹ Formerly known as the “Supplier Sustainability Shared Values” and now incorporates the Supplier Diversity Commitment Policy

and other applicable international principles, including the Voluntary Principles on Security and Human Rights. GBT expects its Suppliers to uphold these same standards.

Labor Practices

GBT will not tolerate the use of child or forced labor in any of its global operations and facilities. We will not tolerate the exploitation of children, their engagement in hazardous work, and the physical punishment, abuse, or involuntary servitude of any worker. For purposes of these Shared Values, a “child” is anyone who is less than 15 years of age.

GBT expects its Suppliers to uphold these same standards. Should a violation of these Shared Values become known to GBT, we may discontinue the business relationship.

Equal Opportunity Employment

Suppliers are expected to support a commitment to diversity and equal employment opportunity. All employment decisions should be made based on job-related qualifications and without regard to race, ethnicity, gender, disability, religion, sexual orientation, gender identity, marital status, citizenship, age or any other legally protected status in each of the countries in which they operate.

A Supplier’s employees must treat each other and anyone with whom they interact with respect and dignity. Suppliers should strive to achieve a positive work environment and take steps to ensure that it is free from unlawful harassment. “Harassment” means offensive behavior based on, or because of an individual’s protected status that interferes with another’s work environment or that has the purpose or effect of creating an offensive, intimidating or hostile work environment.

Supplier Diversity Commitment

As a leading travel management company servicing customers and travelers from around the world, GBT understands the importance of developing and fostering an inclusive and diverse culture. We recognize that a mix of backgrounds, opinions and talents enriches our Company and helps to create and innovate so that we can deliver on our commitments to our stakeholders. We are committed to offering an inclusive workplace where employee differences, such as gender, ethnicity, sexual orientation, gender identity and disability, are valued and leveraged for individual, business and organizational success. GBT also seeks to maintain a nondiscriminatory environment free from intimidation, harassment, or bias based upon these grounds.

This commitment also extends to our relationships with our Suppliers. We support the engagement of Diverse Suppliers on an equal basis with other Suppliers. Our Global Procurement team works to identify opportunities to contract with Diverse Suppliers to satisfy business requirements. We define “Diverse Suppliers” as minority-owned, women-owned, historically underutilized businesses (HUB) zones, service-disabled, veteran-owned, lesbian, gay, bisexual and/or transgender-owned, and small or other disadvantage enterprises.

Freedom of Association

Suppliers shall respect the legal rights of their employees to join or not join worker organizations, including collectively bargained trade unions or other similar external organizations.

Health and Safety

Suppliers shall promote a safe and healthy workplace and be committed to upholding the highest standards of safety and employee protection and adhere to all applicable international and national laws and regulations.

The Environment and Sustainable Development

As a signatory to the United Nations Global Compact and a proponent of the United Nations Sustainable Development Goals, GBT expects its Suppliers to conduct business in a responsible manner and incorporate the United National Sustainable Development Goals into their operations and other business relationships. Suppliers must comply with all regulations on environmental protection and take the necessary measures to reduce their environmental footprint.

Suppliers should be committed to measuring, managing and reducing the environmental impact of their operations, as well as to an ongoing process of continuous improvement of sustainable practices. Suppliers should deploy efforts to improve their energy efficiency, decrease their energy and water consumption and reduce greenhouse gas emissions.

Suppliers should adopt and implement the EU Directive on the use of single use plastics in the supply chain to minimize and reduce the environmental consequences of plastic.

Suppliers should promote environmental responsibility and awareness; and should incorporate eco-conscious decisions into the development of their products and services to reduce any potential negative impact on the environment. GBT expects Suppliers to include environmental considerations in investment decisions where appropriate.

Through waste reduction strategies, recycling programs, and safe disposal policies, Suppliers shall actively strive to minimize waste. Hazardous waste must be disposed of legally and in accordance with applicable laws.

GBT has a long-standing legacy of giving back, whether through donations or volunteerism, and we are committed to maintaining this tradition of philanthropy. GBT encourages its Suppliers to have their own philanthropic program and work with communities and organizations to improve lives and uplift those in need.

Data Privacy and Information Security

Protecting our customers', employees', partners' and our valuable information is essential to our business and we hold ourselves to the highest and most stringent security standards and practices in the industry. Suppliers must manage all data responsibly – it is the right thing to do, it builds the trust of our customers, employees and partners, and protects us – and comply with applicable laws and regulations around the world.

Suppliers shall protect GBT's confidential and personal information with the highest industry standard measures, and shall use GBT's confidential information solely for the purposes for which it is provided under the agreement in place. Any other disclosure of GBTs confidential information or personal information is strictly prohibited.

Modern Slavery and Human Trafficking

GBT is committed to ensuring that there is no slavery or human trafficking in any part of our global operations – this is embodied in our Code of Conduct, which applies to all of our employees. GBT will not tolerate the use of child or forced labor in any of our global operations or facilities. In accordance with these Shared Values, we expect the Suppliers with whom we do business to uphold the same standards.

Suppliers are expected and required to conduct their business in accordance with all applicable laws, rules and regulations including, without limitation, those that relate to modern slavery and human trafficking, such as the United Kingdom's Modern Slavery Act 2015. Suppliers shall not, and shall ensure that their employees and subcontractors or any person acting on their behalf do not, engage in any modern slavery practice, which practice may include slavery, servitude, forced or compulsory labor or the facilitation of the travel of another person with a view to that person being exploited.

Suppliers are expected to conduct proper and adequate checks on any agency or company providing labor, employees, contractors or other persons to the supplier, to ensure that such agency or company does not engage in any modern slavery practice. Suppliers will provide reasonable assistance and information to GBT to enable GBT to comply with applicable anti-slavery law, prepare a slavery and human trafficking statement if requested by GBT, and conduct due diligence to ensure that modern slavery practice is not taking place in the supplier's business or supply chains.

Suppliers will keep detailed and accurate records as required by law showing all steps they have taken to prevent modern slavery practices and compliance with applicable anti-slavery laws by themselves and those in their supply chain. Suppliers shall, upon request by GBT, provide a director or officer's certification to GBT to confirm their compliance with applicable anti-slavery law. If suppliers fail to provide such a certification, GBT shall have the right to audit Suppliers' records and personnel to verify compliance with the applicable anti-slavery law.

Suppliers are expected to warrant to GBT that they have not, and their officers, employees, agents, subcontractors and any other persons who may perform services for or on behalf of the Suppliers, have not (i) engaged in any practices that amount to modern slavery practices; (ii) breached, or caused any person to breach, any applicable anti-slavery law; (iii) been convicted of any offence involving modern slavery practice; or (iv) been the subject of any government or regulatory investigation or enquiry in relation to modern slavery or any offence under applicable anti-slavery laws. Suppliers are required to notify GBT immediately upon becoming aware of any breach or suspected breach of their obligations under this policy, or any potential non-compliance with applicable anti-slavery laws.

Where GBT believes that any officers, employees, agents or subcontractors of a Supplier are engaging in modern slavery practice, Suppliers shall be required to remove such person or entity from the performance of any services to GBT, and to take such action as GBT requires to ensure that the Supplier fully complies with applicable anti-slavery laws.