

MODERN SLAVERY ACT TRANSPARENCY STATEMENT

Introduction

This statement for the financial year ending 31 December 2019 is made by American Express Services Europe Limited, American Express Payment Services Limited, American Express Europe LLC and American Express Group Services Limited (together “**American Express**”) in accordance with Section 54(1) of the Modern Slavery Act 2015 (the “**Act**”).

This statement sets out American Express' actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its business and supply chains. American Express recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Our business

American Express is a global services company. Our principal products and services include charge and credit payment cards and travel-related services, offered to consumers and businesses around the world. Today, American Express is present in more than 130 countries, including all E.U. countries.

In the UK, American Express' proprietary issuing activities are carried out by American Express Services Europe Limited, while its proprietary merchant acquiring and servicing activities are carried out by American Express Payment Services Limited. Both of these American Express subsidiaries are incorporated in the UK and regulated as payment institutions by the FCA. In addition, American Express Europe LLC, a Delaware-incorporated limited liability corporation, with a branch in the UK, operates as a multicurrency clearing house for American Express internationally while also providing consumer travel services. American Express Group Services Limited is a UK-incorporated company which provides intra-group services. American Express is committed to the highest ethical standards within both its business and supply chain and expects the same standards from its suppliers.

Our people

American Express carries out compliance checks on all new employees to ensure that they have the right to work in the United Kingdom. In addition, American Express requires that suppliers of contract or temporary resourcing carry out their own checks of individuals' rights to work in the UK.

Supply Chain

Global Supply Management (GSM) is responsible for governance of the Company's third-party management program. This includes, but is not limited to, facilitating the efficient and effective use of company resources in the acquisition of goods and services from third-party suppliers, while protecting the American Express brand and other financial assets, and complying with company policy and regulatory requirements. The GSM organisation comprises various procurement spend categories, including: (a) Marketing, Advertising and Print; (b) Customer Servicing; (c) Financial, Infrastructure, and Professional Services; and (d) Technology. GSM's category teams enable the achievement of business goals by strategically identifying and executing spend optimisation opportunities and by coordinating global and local procurement strategies across the American Express supply chain.

Additionally, the GSM organisation includes the third-party lifecycle management (TLM) Centre of Expertise. TLM are responsible for performing risk assessments, collecting and reviewing the sufficiency of due diligence required from suppliers, selective validation of ongoing oversight documentation and reporting on third-party risk.

Policies and Due Diligence

As a payment services provider, although we have evaluated the risk of slavery and human trafficking from occurring within our supply chain as low, as part of our ongoing commitment to the highest ethical standards we leverage the following as ways in which American Express can further mitigate any risk:

- All employees at American Express are required to complete Code of Conduct training on an annual basis. Failure to do so constitutes a disciplinary offence. The Code of Conduct sets the highest ethical standards and requires employees to report any suspicion of non-compliant and/or unethical behaviour (which would include breaches of the Act) either by American Express or any of its business partners, including but not limited to suppliers.
- All employees at American Express are required to follow the organisation's values, which are the principles which guide how we carry out our business and interact with our people and communities. We aim to deliver exceptional service to our customers by building long-lasting relationships based on trust and understanding, and the same approach applies to our relationships with suppliers. Further, employees - working in partnership with GSM - interact with suppliers, managing risks, analysing data and ensuring compliance with laws and regulations. Our employees work together across business lines and communicate effectively to ensure all supplier engagement activities are conducted with integrity.
- When GSM contracts with a supplier it stipulates inter alia that: (1) suppliers must comply with all applicable laws when providing goods and/ or services to American Express; (2) appropriate background checks must be carried out on all supplier personnel; and (3) sub-contracting is generally prohibited without the express consent of American Express.
- GSM has developed a comprehensive Approved Supplier List (ASL) and where possible seeks to use ASL suppliers instead of new suppliers. ASL status means at a minimum that there is a valid contract in place with a supplier and that they have been the subject of a risk assessment process which includes, where applicable, verification that the supplier has in place an adequate Code of Conduct, background check and compliance policies as well as all required business licenses. Through the ASL we can minimise the risk of unethical practices (including slavery and human trafficking) from being introduced into the supply chain.
- The TLM programme is a comprehensive and rigorous approach to managing third-party relationships throughout their entire lifecycle. The programme ensures that we appropriately oversee our third party relationships, and comply with strict regulatory requirements in relation to governance, oversight and documentation. The risk assessment model covers several risk categories ranging from strategic risk to reputational risk and operational risk.
- The Anti-Corruption Due Diligence programme is designed to prevent the misuse of American Express funds to further corruption; to protect American Express and its employees from criminal and civil liability by prohibiting activities that violate applicable laws; and to prevent employees and third parties from engaging in bribery on American Express' behalf.