



Modern Slavery Statement

30 June 2022

This modern slavery statement is from the Board of American Express Australia Limited and sets out our actions to understand all potential modern slavery risks related to the American Express business operations in Australia and to put in place steps to eliminate risk of slavery or human trafficking within our business and supply chains.

Our business

American Express is a global payments network connecting consumers, businesses and merchants. It provides innovative payment, travel and expense management solutions for individuals and business of all sizes. With a 170-year history built on service, trust and security and with one of the most recognized brands globally, American Express aspires to provide the world's best customer experience every day and be known for the highest set of ethics and standards in delivering that service.

In Australia, the American Express business is primarily carried out by American Express Australia Limited (AEAL) which is incorporated in Australia and is wholly owned and controlled by its parent entity, American Express Company.

Identifying Modern Slavery risk and conducting risk assessment

We generally consider the risk of Modern Slavery within our business and supply chains as low, due to the nature of our business as a payment service provider, and the suppliers we engage to deliver our services.

We know that our modern slavery risks through our supply chain can be impacted by various factors, including the strength or weakness of the policies, laws, and governance practices in the places where we operate.

To improve our understanding of the different modern slavery risks we may face in different locations and the exposure to related issues such as broader human rights risks and corruption, we continue to consider and utilise tools such as Transparency International Corruption Perceptions Index, Global Slavery Index and Verisk Maplecroft Human Rights Indices. We may also use the US Department of State's Trafficking in Persons report and country narratives, 'KnowTheChain industry benchmarking' and the 'Modern Slavery Registry'. We also request and have regard to our business partners' modern slavery statements and best practices where available.

Some goods and services we procure may be higher risk than others. We have assessed our production (including card manufacturing and printing services), shipping, cleaning and catering services to be among these due to the use of sub-contracting, migrant workers and lower-skilled labor. Accordingly, we conduct additional due diligence when onboarding suppliers in such industries.

We also recognise that increased due diligence is needed when suppliers bring employees or contractors to American Express locations. We ensure that we mitigate against these risks by retaining strict requirements within our supplier contracts and corresponding policies and procedures.



How we address and mitigate Modern Slavery risk within our supply chain

American Express has a team of procurement experts called Global Supply Management (GSM) which is responsible for governance of the American Express third-party lifecycle management program. This program is responsible for performing risk assessments, collecting and reviewing the sufficiency of due diligence required from suppliers (including anti-corruption due diligence), selective validation of ongoing oversight documentation and reporting on third-party risk. The GSM team are adequately trained on risks of Modern Slavery and Human Trafficking, can identify where some suppliers carry higher risk than others, and can explain our standard of Modern Slavery.

Embedding modern slavery requirements into our standard procurement terms

We have developed new contractual language to manage modern slavery risk. The new contractual language has been rolled out in Australia. We openly provide our modern slavery statement to suppliers or complete supplier or partners modern slavery questionnaires where requested. We also actively monitor our suppliers modern slavery statement, and have developed a modern slavery questionnaire to be rolled out to suppliers shortly.

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 the supplier has been approved via our 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.

How we address Modern Slavery risk within our organization

The American Express Code of Conduct deals specifically with Modern Slavery and Human Trafficking. Our Code of Conduct makes clear our commitment to preventing acts of human trafficking and modern slavery within our business, supply chain and partners. Our Code of Conduct sets the highest ethical standards and requires employees to report any suspicion of non-compliant and/or unethical behaviour (including a breach of the Modern Slavery Act) either by American Express or any of its business partners, clients or suppliers. Failure to adhere to the Code of Conduct may be subject to disciplinary action, up to and including termination of the employment relationship.

Innovative Chatbot Training

We take seriously our duty to ensure that our employees are made well aware of our Code of Conduct and the issues of modern slavery. We developed an innovative chatbot which trained our staff about the risks of modern slavery, the risks within our company, and the strategies we have developed to combat the risk of modern slavery.

We have a number of teams specifically involved in mitigating the risk of modern slavery within our organization:

- The Colleague Experience Group in employee vetting, and policy development;
- Global Supply Management – to appropriately screen Suppliers and enforce our standards;
- Our Legal and Compliance teams to monitor broader compliance with laws relating to modern slavery and our Statement; and
- The broader business in negotiations with partners, suppliers and clients.



American Express maintains the highest standard of care for its employees, satisfies all laws as they relate to employee conditions and minimum pay, and ensures no employee may feel under any obligation to remain employed against their wishes. American Express carries out compliance checks on all new employees to ensure they have the appropriate right to work in Australia.

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.

Final Note

We are proud of the work we have done, and continue to do, to prevent modern slavery practices in Australia and beyond. There is always more to do, and we look forward to collaborating with others in our industry, with our partners, and our colleagues globally, in developing best practice to eliminate all risk of modern slavery in Australia and around the world. Of particular focus for next year, will be opportunities around transaction monitoring continuing to build employee awareness of modern slavery risks, fresh training and further testing of existing measures.

This Statement was approved by the Board of Directors of American Express Australia Limited on 25 May 2022.

A handwritten signature in black ink, appearing to read "Corrina Davison", written over a horizontal line.

Corrina Davison

Senior Vice President and Country Manager

American Express Australia Limited

25 May 2022