

## Modern Slavery and Human Trafficking Statement

This statement highlights the programs and initiatives American Airlines, Inc. has undertaken to combat modern slavery and human trafficking during the financial year ending 2021.

### Our commitment

American is committed to respecting human rights, including combating illegal human trafficking and child exploitation. As a prominent part of the worldwide travel industry, we conduct our business with a focus on protecting human rights and the rights of children within our sphere of influence. We have adopted responsible workplace practices and endeavour to conduct our business operations free from complicity in human rights abuses.

### Our structure and operations

American is one of the largest airlines in the world, providing scheduled air transportation for passengers and cargo throughout the United States and around the world. American is a founding member of the **oneworld** Alliance, which brings together a global network of 14 world-class member airlines and their affiliates, working together to provide a superior and seamless travel experience.

### Assessment of our modern slavery risk

Millions of people trust American to transport them safely to the moments that matter most. We fly over borders, walls, and stereotypes to connect people from different races, religions, nationalities, economic backgrounds, and sexual orientations. Unfortunately, making the world a smaller place can come with the risk of exploitation by human traffickers. The breadth of products and services American procures across its global supply chain also may expose the company to modern slavery risk.

American's assessment of its operational and supply chain risk falls within a broader enterprise-wide risk management framework. Modern slavery risk is first assessed without consideration given to the mitigation controls American has in place, producing an inherent risk level. In determining this inherent risk level, the company evaluates internal and external stakeholder data and source material.

The inherent risk is then considered with American's existing controls to produce an assessment of the current, or net, level of risk. The goal of this process is to allow senior management to understand if the company is appropriately controlling its risks and, if not, what additional measures the company should take.

American annually updates its risk assessment to identify potential modern slavery and human trafficking risk the company is likely to encounter such as entry into new markets, new regulations, and changes in the supply chain. Risk matrices are reviewed by the Chief Ethics & Compliance Officer, and risk areas rated Serious or High are reviewed yearly with the Chief Legal Officer.

In 2018, American also undertook a materiality analysis of environmental, social, and governance issues, which included illegal trafficking, to identify the most critical risk areas for the company. We considered the concerns and expectations of stakeholders to identify areas of risk and opportunity. To gain maximum insights, we also evaluated where the key impacts of material issues occur across our value chain, which has allowed us to more precisely define our scope of reporting while prioritising strategic actions for each issue. This work is the foundation for ongoing stakeholder engagement and developing more targeted initiatives and messaging for our corporate responsibility strategy. We anticipate renewing the materiality analysis in 2022.

## Our program

As a global airline, we recognise our unique role and responsibility to combat human trafficking and modern slavery. We embrace this responsibility by maintaining a comprehensive human trafficking prevention program. American's program comprises four essential elements: (1) policies addressing human trafficking; (2) training to identify and report suspected human trafficking; (3) internal accountability; and (4) external engagement and collaboration.

## POLICIES

Our commitment to human rights is outlined in our Standards of Business Conduct, which require American's team members to uphold the human rights of all persons, including permanent and temporary team members both domestically and internationally. We do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labour), physical punishment, forced labour, or human trafficking.

For many years, we addressed expectations about our commitment to human rights in our [Standards of Business Conduct](#) for team members and suppliers. In 2020 we strengthened those expectations through the adoption of a [Human Rights Statement](#) that embodies our core values and commitment to respecting human rights in all aspects of our business and geographies where we operate. Our Human Rights Statement applies to all team members, contractors, suppliers, and other business partners.

As a U.S. federal government contractor, American is subject to the Trafficking Victims Protection Act of 2000 and implementing Federal Acquisition Regulation (FAR) 48 CFR 52.222-50—Combating Trafficking in Persons—which was enacted to combat all forms of human trafficking and forced labour. We have adopted a Policy Prohibiting Trafficking in Persons and Compliance Plan that serves as a guide to address and comply with these regulatory requirements. We also flow down FAR 52.222-50 as required to our government subcontractors and agents. Any violations of the FAR or American's policy prohibiting trafficking in persons by team members, agents, or subcontractors may cause the agent's or subcontractor's removal from the contract, termination of the contract, reduction in a team member's benefits, or termination of employment.

American's policies and other information on human trafficking and modern slavery, including links to educational and training resources, are available to all team members on the company's intranet site.

## TRAINING

Through training, American team members learn how to recognize the signs of human trafficking and what action to take if they suspect human trafficking. We have mandatory human trafficking awareness training for our frontline, customer-facing team members, including flight attendants, pilots, and airport customer service representatives, as well as for team members with international purchasing responsibilities. This training is required for new employees and as part of our recurrent training programs. All told, we train over 70,000 team members each year.

## INTERNAL ACCOUNTABILITY

American encourages the reporting of any incidents of suspected human trafficking or other activity inconsistent with our Standards of Business Conduct. American's Business Ethics helpline, EthicsPoint, is available 24/7 to all team members and business partners globally, and reporters can remain anonymous. They can call a toll-free number or use an online, secure web portal to ask questions or report questionable conduct. American's Business Ethics & Compliance Office and Legal department also receive reports by telephone, mail, and email. We also inform team members they may report any activity inconsistent with U.S. government policy or American's policy by contacting The National Human Trafficking Hotline.

We will protect anyone suspected of being victims of or witnesses to prohibited activities. We will also cooperate fully with any trafficking-related audits and investigations by the U.S. federal government, including providing reasonable access to our facilities and staff.

American has a zero-tolerance policy against retaliation. Any team member who violates this policy will be subject to appropriate discipline, including reduction in benefits or termination of employment.

## EXTERNAL ENGAGEMENT AND COLLABORATION

Collaboration with government agencies, industry partners, and non-government organisations is a key facet of our human trafficking prevention program.

In January 2018, American signed ECPAT-USA's Tourism Child-Protection Code of Conduct. ECPAT-USA is the leading policy organisation in the United States seeking to end the commercial, sexual exploitation of children. The Code, which represents a joint venture between the tourism private sector and ECPAT, is a voluntary set of business principles travel and tour companies can implement to prevent child sex tourism and trafficking of children.

American is also proud to be involved with the U.S. Department of Homeland Security's Blue Campaign, a national public awareness campaign designed to educate the public, law enforcement and other industry partners to identify the indicators of human trafficking, and how to appropriately respond to possible cases.

Recognising our responsibilities as one of the largest employers in Texas, we joined Texas Businesses Against Trafficking (TBAT) in 2019, a business partnership established by the Office of the Texas Secretary of State to combat human trafficking by fostering collaboration between the

public and private sectors. American was recognised for its commitment to combating human trafficking by the Texas Secretary of State at the inaugural TBAT forum in October 2019.

Other notable activities:

- In 2021, American joined the [United Nations Global Compact](#), the world's largest corporate sustainability initiative. As a signatory, we commit to align our strategies, policies and operations with universal principles on human and labour rights, the environment, and anticorruption. Among the UN Global Compact principles, members pledge to uphold the elimination of all forms of forced and compulsory labour and effective abolition of child labour.
- During National Slavery and Human Trafficking Awareness Month in 2020, Executive Vice President Elise Eberwein represented American at a Department of Transportation (DOT) event led by U.S. Transportation Secretary Elaine Chao, which brought together the U.S. transportation industry in a unified show of opposition to human trafficking. On behalf of the company, Elise signed a [pledge to educate team members](#) about human trafficking, raise awareness, and share progress on our efforts with DOT
- We joined forces with New Friends New Life (NFNL), a Texas-based organisation working to restore and empower formerly trafficked teenage girls and sexually exploited women and their children. In the first months of the partnership, NFNL held training sessions for over 100 American team members at our headquarters in Fort Worth, Texas, and another 120 team members at Miami International Airport. Our legal team also provided pro bono services to NFNL, such as helping the organisation's clients expunge criminal records from their time being trafficked. For its efforts, American was selected as a [2021 ProtectHER Award recipient](#) by NFNL.
- Before Super Bowl LIV, on inbound flights to Miami, American featured campaign content from the anti-trafficking organisation [It's A Penalty](#), including a 30-second inflight film.
- Marked Human Trafficking Awareness Day by sharing a message with 1.6 million followers on Twitter. In 2019, we also published an American Story on the company's [Newsroom web page](#) highlighting participation in the Safeguarding All from Exploitation (SAFE) Action Project.
- Sponsored an ECPAT-USA forum on Capitol Hill for the release of the organisation's Public Resource Guide.

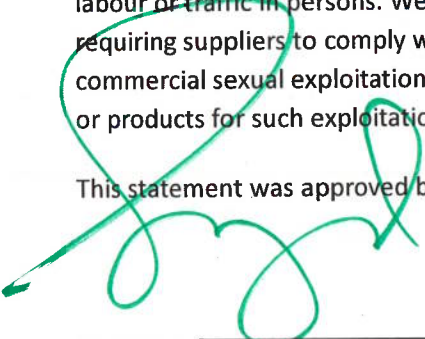
## Vendor management and supply chain assurance

Our commitment to running a responsible airline also extends to our supply chain. We procure high-quality, cost-competitive goods and services from over 10,000 suppliers. The most significant elements of our supply chain include jet fuel, aircraft and aircraft parts, inflight food and beverages, technology, and office supplies.

Key criteria for doing business with American include providing the best value in price and quality, understanding the airline industry, being financially stable, and certifying ethical business practices. These expectations are outlined in our Standards of Business Conduct for Suppliers and on a Supplier Management Portal. To ensure suppliers meet our standards, we include a risk matrix in our standard requests for proposal, which asks about their policies and practices around labour, business ethics, the environment, health, and safety. We monitor supplier performance against these criteria and assess potential risks, such as labour standards or workplace safety violations. In certain situations, particularly in geographic locations or product and service industries where modern slavery risk may be higher, our Procurement team will inspect a prospective supplier's facilities and operation to validate workplace practices.

American also encourages its suppliers to share our commitment to combat modern slavery. Through our [Standards of Business Conduct for Suppliers](#), we require suppliers to not use forced labour or traffic in persons. We also added a provision in our supplier contract templates requiring suppliers to comply with laws and regulations to prevent human trafficking and commercial sexual exploitation of children, including preventing the use of American's premises or products for such exploitation.

This statement was approved by the board of directors of American Airlines, Inc.



---

Stephen L. Johnson, Director  
American Airlines, Inc.  
June 2022