

An American Airlines aircraft is shown in flight, banking slightly to the left. It is positioned in the middle ground, flying above a dense layer of white clouds. Below the clouds, a range of rugged mountains is visible, their peaks and ridges heavily covered in snow. The sky above the plane is a clear, deep blue, and a bright sun is visible in the upper left corner, creating a starburst effect and casting a soft glow over the scene. The overall composition is clean and professional, typical of a corporate report cover.

# Modern Slavery and Human Trafficking Report

2024

American Airlines 

# About this Statement



This report highlights the programs and initiatives American Airlines, Inc. has undertaken to combat modern slavery (including forced labour and child labour) during the financial year ending December 31, 2024. It is prepared under the UK Modern Slavery Act 2015, Australia Modern Slavery Act 2018, and Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (collectively, the “Acts”).

## Our commitment

At American, we are committed to upholding and promoting human rights in all aspects of our operations. This commitment extends to combating human trafficking, modern slavery, and child exploitation. As a prominent member of the global travel industry, we recognize our responsibility to operate with integrity and protect the fundamental rights and dignity of individuals, especially those who are the most vulnerable.

We strive to conduct our business with the highest ethical standards, and that includes ensuring that our policies and practices respect and protect human rights. We have implemented robust measures to prevent and address instances of forced labor, child labor, or exploitation within our supply chain and business operations. Through monitoring and due diligence, we work to identify and mitigate risks associated with human rights abuses.

We are committed to fostering a safe and inclusive workplace that upholds our team member's rights and well-being. We provide training and resources to our staff to help them recognize and respond to potential human rights violations, including signs of human trafficking. By partnering with industry leaders, nongovernmental organisations, and law enforcement agencies, we aim to strengthen our efforts in combatting these heinous crimes.

Our dedication to human rights extends beyond compliance with legal obligations. We support initiatives that promote social justice, equality, and the protection of vulnerable populations. We strive to make a positive impact on the communities we serve and contribute to the global fight against human trafficking and exploitation.

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Respecting and safeguarding human rights is not only a moral imperative but also essential to building a sustainable and equitable future for all.

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In 2024, we took steps to strengthen and enhance our anti-human trafficking and modern slavery prevention program, including:

- ➔ We expanded our collaboration with the U.S. Department of Transportation and U.S. Department of Homeland Security's Customs and Border Protection by becoming a member of the Blue Lightning Initiative. This effort focuses on training airline personnel to recognize the indicators of human trafficking and to take appropriate action.
- ➔ We retained global sustainability expert Anthesis Consulting Group to assess our uniform supply chain for potential risks and to make recommendations to strengthen our due diligence practices and other supply-chain processes and controls to ensure we comply with international regulations.
- ➔ We conducted our annual risk assessment to identify potential modern slavery and human trafficking risk in our operations and supply chains. Our 2024 assessment, based largely on the controls we have implemented to mitigate human trafficking and modern slavery risk, resulted in an overall low rating for the company.



# Our structure, activities, and supply chain



## Who we are

American is a Delaware corporation with its headquarters in Fort Worth, Texas. American is a wholly owned operating subsidiary of American Airlines Group, Inc. (AAG). Our 130,000+ team members are devoted to creating a world-class customer experience. Together with our affiliated regional airlines and third-party regional carriers operating as American Eagle, American is one of the largest airlines in the world, providing scheduled air transportation for passengers and cargo through our hubs in Charlotte, Chicago, Dallas/Fort Worth, Los Angeles, Miami, New York, Philadelphia, Phoenix and Washington, D.C. and partner gateways, including in London, Doha, Madrid, Seattle/Tacoma, Sydney and Tokyo (among others). We provide service to over 350 destinations around the world. In 2024, over 226 million passengers boarded our flights as we launched over 50 new routes, including New York to Tokyo, Dallas/Fort Worth to Brisbane, Philadelphia to Copenhagen and Philadelphia to Nice. We also announced over 20 new or expanded routes for customers to explore in 2025,

including to trans-Atlantic destinations such as Athens, Greece, and Milan, Rome, Venice and Naples in Italy.

American is a founding member of the oneworld® Alliance, which brings together a global network of 13 world-class member airlines and their affiliates, working together to provide a superior and seamless travel experience.

American also operates a cargo division that provides a wide range of freight and mail services, with facilities and interline connections available across the globe. In 2024, we served approximately 21,000 unique origin and destination pairs, transporting over 1.0 billion pounds freight and mail across our network. We continue to focus on ways to better serve our customers, including expanding our digital offerings, which provide greater efficiency, increased accuracy, 24/7 access to search schedules, and the ability to check availability, retrieve rates and make bookings.



## Our sustainable supply chain

At American, operating responsibly is at the core of everything we do — and that commitment extends to our supply chain. We partner with over 10,000 trusted suppliers to source high-quality, cost-effective goods and services. Through oversight and collaboration across all business units, we seek to ensure our supply chain operates with integrity, efficiency, and environmental responsibility.

While we sources goods and services globally, most of our annual supplier spend is focused on top suppliers in key markets, with the U.S. being the most prominent. This concentrated spend allows us to foster strong, long-term partnerships with key suppliers, helping us better understand and manage supply chain risks. The chart on the right identifies our top 10 countries of procurement spend by principal supplier location.

We have nine essential procurement teams:

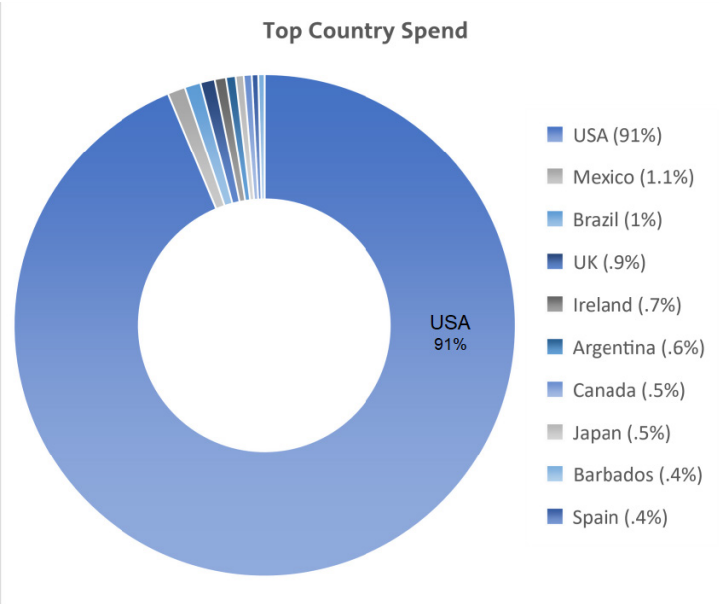
Team	Responsibilities
Technical Operations	Aircraft parts, components, equipment, and systems.
Technology	Management of IT services, including network, infrastructure, cloud, communications, mobility, software, and application support.
Airport	Products and services used by the operation and our team members, including ground equipment, outsourced ground and passenger services, and office supplies
Customer	Onboard products and services such as blankets, amenity kits, cutlery, and catering.
Crew	Products and services to support our flight crews, such as uniforms, luggage allowance, and hotels.
Fuel	All fuel for aircraft and ground service equipment used in our global operation.
Professional Services	Professional and managed services, contract labour, contingent workforce, and consulting services.
Facilities	Construction services, security, facilities management, building materials, and utilities for our owned and leased properties.
Corporate Real Estate	Acquisition and property management costs for our owned and leased properties

Historically, American’s procurement teams were decentralised, with each department managing its own purchasing strategies, controls, and procedures. While flexible, this approach often led to inconsistencies in supplier selection and onboarding, and limited insight into overall third-party spending.

In early 2024, we appointed a new Chief Procurement Officer to centralize purchasing and improve transparency, efficiency, and cost savings. A key part of this change is the creation of a system to monitor and analyze third-party expenditures, offering insights into spending patterns and enabling data-

driven decisions for optimization and risk mitigation.

Jet fuel remains our largest procurement category. Due to its importance, we dedicate substantial resources to evaluating the health, safety, environmental, and labor risks throughout the fuel’s production, distribution, and usage on our aircraft. This rigorous process helps ensure compliance with regulatory standards and supports American’s commitment to sustainability and responsible sourcing.









## Canada operations

American provides scheduled year-round service from the U.S. to four locations in Canada: Toronto, Ontario; Vancouver, British Columbia; Calgary, Alberta; and Montreal, Quebec. We also operate seasonal service to Halifax, Nova Scotia. We have over 380 team members to manage our operation in Canada.

American regularly imports goods—such as uniforms, catering, onboard items, and aircraft parts—to support our Canada operations and enhance the passenger experience. The table below shows the categories of goods imported into Canada in FY2024, their share of total imports, and their countries of origin and export.



Goods Category	Examples	% of FY24 Imports	Countries of Origin	Country of Export
 Inflight goods	Passenger amenities (blankets, pillows, amenity kits), cabin dining (tableware, linens, trays), lavatory products (toilet tissue, paper towels, soap), and safety cards.	17%	U.S. (52%) China (40%) Vietnam (3%) Mexico (2%) Taiwan (1%) Other (2%)	U.S.
 Food and beverage	Snacks and beverages—inflight and lounges.	5%	U.S. (83%) Belgium (10%) China (3%) Mexico (2%) Sri Lanka (1%) Other (1%)	U.S.
 Aircraft maintenance	Aircraft parts, components, equipment, and engine fluids.	12%	U.S. (68%) Canada (21%) France (7%) Great Britain (1%) Denmark (1%) Other (2%)	U.S.
 Airport operations	Goods, other than information technology, used to support ground operations (ticket stock, safety gear, office supplies).	9%	U.S. (69%) China (17%) Sri Lanka (9%) France (2%) Canada (1%) Other (2%)	U.S.
 Uniforms and accessories	Uniforms and required travel ware for onboard, airport, and ground support team members.	55%	China (37%) U.S. (32%) Sri Lanka (13%) Indonesia (9%) Vietnam (3%) Other (6%)	U.S.
 Information technology	Computers, monitors, ticket kiosks, and other technology supporting airport operations.	2%	U.S. (44%) China (13%) Taiwan (10%) Mexico (8%) Canada (6%) Other (19%)	U.S.

# Assessing our modern slavery risk



Millions of people trust American to care for them on life's journey. 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. While studies suggest airlines are rarely used for labour trafficking, we recognise our aircraft could potentially be used by traffickers for forced labour involving debt bondage or sexual exploitation.

Our global supply chain encompasses many products and services, which may inadvertently expose the company to the risk of modern slavery. Given the complexity and scale of our supply chain, it's not feasible to exhaustively assess every supplier to determine how they identify, mitigate, and address modern slavery risks. So we prioritize our efforts by focusing on suppliers and products within industries and geographic regions that present a heightened risk of modern slavery. For instance, there may be a higher risk of forced or child labour associated with garments and other textiles from China. Or the coffee and produce we use in our lounges or inflight meals could be harvested in parts of South America where there may be a risk of exploitation of migrant workers through debt bondage.

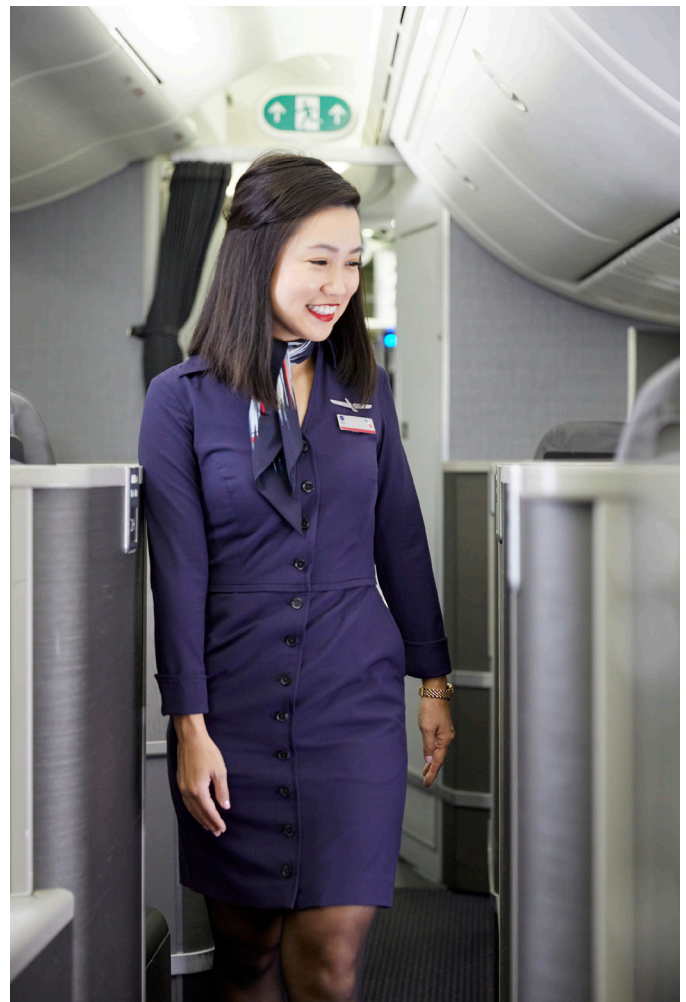
We also concentrate on suppliers most integral to our operations, ensuring that our due diligence and risk mitigation strategies are targeted and effective. Using this approach, we aim to uphold ethical labor practices while maintaining our supply chain integrity.

Assessment of our operational and supply chain risk falls within a broader risk management framework. We first assess modern slavery risk without considering mitigation controls we have in place, which produces an inherent risk level. In determining this risk level, we evaluate internal and external stakeholder data and source material. We also assess both suppliers critical to our operation and those vulnerable to environmental, social, and governance (ESG) risks based upon geographic, sector, and product-specific factors. Understanding where the products we buy are sourced helps us identify potential modern slavery risk in our supply chain.

The inherent risk is then considered with American's existing controls to assess the current, or residual, level of risk. This process allows senior management to better understand if we are appropriately controlling our risk and, if not, what additional measures we should take. For both inherent and net risk, we assign the risk level by evaluating (1) the likelihood

of noncompliance involving that risk, and (2) the reasonably possible impact (most credible consequence) of noncompliance with that risk. Once we assess a risk's likelihood and impact, we calculate the risk level by plotting likelihood and impact on our risk assessment matrix.

We annually update our risk assessment to identify potential modern slavery and human trafficking risk we may encounter because of entry into new markets, new regulations, and supply chain changes. Risk matrices are reviewed by our Chief Ethics & Compliance Officer, and risk areas rated Serious or High are reviewed annually with our Chief Legal Officer. Our 2024 risk assessment resulted in an overall "low" rating for operational risk and a "minor" rating for our supply chain risk.



# How we manage modern slavery risks



As a global airline, we recognise our unique role and responsibility to combat modern slavery and child exploitation.

We embrace this responsibility by maintaining a comprehensive human trafficking and modern slavery prevention program designed to prevent, detect, and remedy forced or child labour. American's program comprises four essential elements: (1) policies and due diligence processes addressing modern slavery; (2) training to identify and report suspected human trafficking and forced labour; (3) internal accountability and reporting; and (4) external engagement and collaboration.

## Our policies and due diligence processes

Our commitment to human rights is outlined in our Standards of Business Conduct, which requires all team members to uphold the human rights of all persons. We do not knowingly conduct business with individuals or companies that participate 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. Updated in 2022, our Human Rights Statement is formally aligned with global standards, such as the UN Guiding Principles on Business and Human Rights, and it applies to all team members, contractors, suppliers, and other business partners.



As a U.S. federal government contractor, we are 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 human trafficking and forced labour. We have adopted a Policy Prohibiting Trafficking in Persons and Compliance Plan to 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 our policy prohibiting trafficking in persons by team members, agents, or subcontractors may cause an agent's or subcontractor's removal from the contract, termination of the contract, suspension of the team member's privileges, or termination of employment.

We expect our suppliers to share our commitment to human rights and ethical business practices. Our 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 Supplier Corporate Social Responsibility Assessment in our standard requests for proposals, which asks suppliers about their policies and practices around wage and labour standards, business ethics, the environment, and health and safety. In August 2024, we updated our Sustainable Supply Chain Policy, which formalises our long-standing procurement strategy to conduct business with partners and suppliers who share our commitment to sustainability, including respecting human rights.

We also directly engage with suppliers and use third-party screening services to detect and better understand our risks. This multi-layered assessment helps us identify potential areas of risk, and where identified, flag suppliers for additional due diligence. We monitor supplier performance against these criteria and assess potential risks, such as labour standards or workplace safety violations. We engage with our critical suppliers regularly, asking targeted questions about their ESG practices. Our teams review responses and follow up with suppliers to address any concerns. In certain situations, particularly in geographic locations or product and service industries where modern slavery risk may be higher, our Procurement team inspects prospective supplier's facilities and operations to validate workplace practices.

For more information about our policies and procedures related to ethics and human rights, as well as our Standards of Business Conduct, please visit our [website](#).

Through our Standards of Business Conduct for Suppliers, we require suppliers to not use forced labour or child labour and not engage in slavery or trafficking of persons. We also added a provision in our supplier contract templates requiring suppliers to comply with laws to prevent human trafficking and commercial sexual exploitation of children, including preventing the use of our premises or products for exploitation.

We realise modern slavery risk is not limited to our Tier 1 suppliers and may exist farther downstream in our supply chain, where we have less direct knowledge of working conditions and sub-supplier practices. We plan to use third-party screening services to identify risks our Tier 1 suppliers may encounter through their suppliers, evaluate Tier 2 and 3 supplier risk as part of our supply chain assessments, and work with our Tier 1 suppliers to mitigate identified risks.

Our policies and other information on human trafficking and modern slavery, including links to educational and training resources, are available to all team members on our intranet site.



## Training

Training is an integral part of our human trafficking and modern slavery prevention program. Through training, team members learn to recognise signs of human trafficking and modern slavery and what action to take if they suspect violations. We have mandatory human trafficking awareness training for our frontline, customer-facing team members, including flight attendants, pilots, and airport customer service agents. This training is required for new team members and as part of our recurrent training programs. We also offer modern slavery training developed by TRACE International for team members with international purchasing responsibilities, which helps them learn how to identify and be aware of forced labour, how to avoid forced labour, understand what to do if they suspect possible modern slavery risks, and report them. We train over 70,000 team members each year.

## Accountability and reporting

We know, even with robust policies and practices, that companies may unknowingly cause or contribute to forced or child labour in their supply chains. Should we identify such instances, whether through our due diligence processes, risk assessments, or other means, it is our responsibility to remedy them. According to the UN Human Rights Council's Guiding Principles on Business and Human Rights, grievance mechanisms for those potentially affected by the business enterprise's activities can be an effective way to enable remediation.

We encourage our team members and suppliers to report any incidents of suspected human trafficking, forced labour, or other activity inconsistent with our standards. Our business ethics helpline, EthicsPoint, is available 24/7 to all team members, suppliers, and business partners globally, and reporters can remain anonymous. Reporters can call a toll-free number, use an online, secure web portal, or access the helpline with a mobile device to ask questions or report questionable conduct.

Our 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.

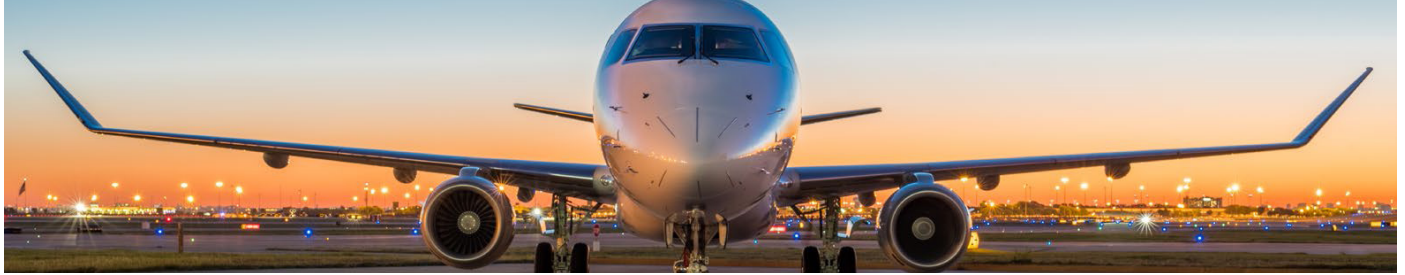
We will protect anyone suspected of being a victim of or witness to prohibited activities. We will also cooperate with any trafficking-related audits and investigations by the U.S. federal government, including providing reasonable access to our facilities and staff.

We have a zero-tolerance policy against retaliation. Any team member or supplier who violates this policy will be subject to appropriate discipline, up to and including termination of employment or contract.

We recognise that terminating supplier relationships can harm their employees and families who rely upon the supplier for their income. We received no reports or complaints of forced or child labour in 2024 that would require us to take remediation measures and we are unaware of any loss of income to vulnerable families resulting from measures taken to mitigate or eliminate the risk of modern slavery in our activities and supply chains.

Our EthicsPoint helpline helps us to identify, address, and remediate suspected abuses. If forced labour or child labour is discovered in our supply chain, we will consider our response and its potential impacts and engage with relevant suppliers to implement a corrective action plan to meet international human rights standards and avoid the use of forced or child labour.





## External engagement and collaboration

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

In 2024, American became a member of the Blue Lightning Initiative (BLI), expanding our collaboration with the U.S. government to combat human trafficking. Led by the U.S. Department of Transportation (DOT) and the U.S. Customs and Border Protection, this effort focuses on training airline and aviation personnel, ensuring they have the tools to better identify potential traffickers and victims. Before joining BLI, we participated in the U.S. Department of Homeland Security's Blue Campaign, a national public awareness campaign designed to educate the public, law enforcement, and industry partners about human trafficking.

We are also a member of the DOT's Transportation Leaders against Human Trafficking initiative, which is comprised of transportation and travel industry stakeholders working together to address human trafficking.

We are a signatory of PACT's Tourism Child-Protection Code of Conduct. PACT (Protect All Children from Trafficking) is the leading policy organisation in the U.S. seeking to end the commercial, sexual exploitation of children. We have also donated AAdvantage® miles to enable members of PACT's Survivors' Council to participate in meetings with members of U.S. Congress and other elected officials to share their expertise and recommendations to improve trafficking prevention legislation and policies.

Recognising our responsibilities as one of the largest employers in Texas, in 2019 we joined Texas Businesses Against Trafficking (TBAT), 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. We were recognised for its commitment to combating human trafficking by the Texas Secretary of State at the inaugural TBAT forum in October 2019.

American is a staunch supporter of It's a Penalty, an organisation combatting human trafficking, exploitation and abuse, through educational campaigns during major sporting events around the globe. Our team members volunteered their time by joining It's a Penalty's 2024 Super Bowl campaign launch and supporting its advocacy efforts. We also promoted the organization's mission on our seatback and wireless entertainment platforms during the first two months of 2024. And like PACT, we have donated AAdvantage® miles to help facilitate trainings, awareness sessions and other initiatives that can benefit from air travel.

We maintain a strong partnership with New Friends New Life (NFNL), a Texas-based organisation that empowers formerly trafficked and sexually exploited women and their children. In collaboration with our employee business resource groups—Professional Women in Aviation, Black Professional Network, and Latin Diversity Network—NFNL conducts human trafficking awareness sessions for our team members. Our legal team also provides pro bono services, such as helping clients expunge criminal records from their time being trafficked. For these efforts, American was honored with the 2021 ProtectHER Award from NFNL, and in January 2024, received a Pro Bono Service Award from the U.S. Government's Legal Services Corporation.

Other notable activities:

- ➔ In 2021, American joined the UN Global Compact, the world's largest corporate sustainability initiative. By becoming a signatory, we pledged to align our strategies, policies, and operations with universal principles on human rights, labor rights, environmental protection, and anti-corruption. This includes a commitment to eliminate all forms of forced and compulsory labor and to abolish child labor.
- ➔ In early 2024, American's Professional Women in Aviation Employee Business Resource Group hosted human trafficking awareness sessions in partnership with the Department of Homeland Security and other organizations. These sessions took place at: Dallas Fort Worth International Airport (DFW), Ronald Reagan Washington National Airport (DCA), Boston Logan International Airport (BOS), Phoenix Sky Harbor International Airport (PHX), and London Heathrow Airport (LHR).



In January 2024, over 100 team members and other aviation professionals attended our human trafficking awareness session at Ronald Reagan Washington National Airport.

## Assessing the effectiveness of our program



Evaluating the effectiveness of our human trafficking and modern slavery prevention program is critical to ensuring that forced labour and child labour are not present in our operations and supply chains.

We recognise that accurately measuring a program's impact can be challenging, because issues are often complex and hidden. Traditional key performance indicators (KPIs) and metrics may not capture the success of prevention efforts, making it difficult to assess progress.

Despite these challenges, we are dedicated to improving our approach to combat human rights violations. We aim to develop meaningful ways to measure the effectiveness of our program and hold ourselves accountable. This includes regularly

reviewing our policies and procedures to identify gaps and opportunities for improvement. We also track KPIs such as the number of team members trained on human trafficking and the number of human rights concerns reported through EthicsPoint.

By monitoring these indicators and engaging with stakeholders, we hope to strengthen our program and proactively address risks within our supply chain. Our goal is to meet compliance standards and make meaningful changes to prevent exploitation and protect vulnerable workers.

**We strive to continually improve our efforts to combat modern slavery and human trafficking within our operations and supply chain. Here are some of the initiatives we will be pursuing in 2025:**

## On the horizon in 2025

- American has engaged a globally recognized environmental, sustainability and governance (ESG) assessment platform, EcoVadis, to assess our supplier ESG performance, based on four key categories: environmental impact, labor and human rights standards, ethics, and procurement practices. This initiative will enhance supply chain transparency, help us evaluate supplier labor practices, and identify high-risk suppliers for enhanced due diligence. It will also drive improvements by encouraging ethical labor compliance, tracking progress, and promoting responsible sourcing.
- By the second quarter of 2025, Anthesis will complete its due diligence readiness assessment of our uniform supply chain and provide recommendations to effectively manage potential adverse impacts and ensure readiness with the European Union's new Corporate Sustainability Due Dilligence Directive and other international legislation.
- We will conduct our annual assessment to identify human trafficking and modern slavery risk within our operation and supply chains, using our updated risk rating matrix.
- We plan to review and update our Standards of Business Conduct for Suppliers and Human Rights Statement to stay aligned with evolving laws and industry best practices.



## Approval and attestation

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

In accordance with the requirements of the Acts, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the reporting year listed above.

I have authority to bind American Airlines, Inc.

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Stephen L. Johnson  
Director, American Airlines, Inc.  
May 2025