

MODERN SLAVERY STATEMENT

American Express Australia Limited

30 June 2021

Introduction

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 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 will also request and have regard to our business partners' modern slavery statements 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 risk of modern slavery within our supply chain

American Express has a Global Supply Management (GSM) organisation which 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.

Additionally, the GSM organisation includes the third-party lifecycle management program (TLM). 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 TLM process and supplier due diligence will include the use of a modern slavery questionnaire, a supplier code of conduct and a shared values statement for our suppliers review and agree.

Embedding modern slavery requirements into our standard procurement terms

We have developed new contractual language to manage modern slavery risk. The new contractual language will be rolled out for Australia and other markets as soon as possible.

Stipulated within our new contracts, suppliers must:

1. Ensure compliance with all applicable modern slavery laws and take steps to meet international standards around modern slavery.
2. Confirm its company has not been convicted or investigated for modern slavery offences.
3. Take reasonable steps to ensure its company, subcontractors, and others in its supply chain have adequate procedures to prevent and address modern slavery.
4. Grant American Express the right to audit its company and subcontractors for compliance against the above requirements.
5. On request, provide a copy of any modern slavery statement its company is required to prepare under relevant modern slavery reporting legislation where applicable.

We view this new modern slavery clause as an important development to drive both contractual compliance within our supply chain and reinforce our own commitment to support the abolition of modern slavery.

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 and mitigate risk of modern slavery within our organisation

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.

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. Mandatory training is delivered to all employees of the American Express Code of Conduct, and additional bespoke, face to face and interactive training is intended to be delivered on Modern Slavery risk as well as other elements of American Express's strategy in relation to Corporate Social Responsibility.

To further embed this within our organization, there are a number of teams 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 the all 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 colleagues globally, in developing best practice to eliminate all risk of modern slavery in Australia and around the world.

This statement was approved by the Board of Directors of American Express Australia Limited on 27 May 2021.



Corrina Davison

Senior Vice President & Country Manager

American Express Australia Limited

27 May 2021