



# Standards of Business Conduct for Suppliers

Caring Begins with Doing the Right Thing™

## To our suppliers,

We're building American Airlines to thrive forever. This requires a strong commitment to our customers, shareholders, business partners, and team members. We must always act with integrity, treat others with respect, and ensure every decision we make is a responsible and ethical one. As a supplier to American Airlines, we know that you embrace these same values. To quote our CEO Robert Isom, "What we do matters—how we do it defines us™."

We have created our Standards of Business Conduct for Suppliers to clarify our minimum expectations for workplace standards and ethical business practices. All our suppliers should be familiar with these Standards when doing business with American. They reflect our corporate value system, which is based on integrity, honesty, and the absolute dedication to making responsible and ethical decisions. American wants to do business with suppliers who share these principles.

We know that many of you have your own mature compliance programs, including your own codes of ethics. These Standards supplement, and are not meant to replace, your current code. If you're a supplier with your own code, continue to follow your code, and review the Key Expectations page to ensure your code covers the same areas of concern underscored in these Standards.

If you don't already have your own code of ethics, consider adopting a code suited to your business needs and the unique risks your company faces. Meanwhile, please review these Standards carefully so you will understand our ethical expectations for all of our suppliers.

If you ever have concerns about our conduct, contact your business partner at American, your own company's ethics office or legal counsel, or American's EthicsPoint helpline at (877) 422-3844 or [aa.ethicspoint.com](http://aa.ethicspoint.com). The helpline is available 24/7, and you can remain anonymous.

Our purpose, working together, is To Care for People on Life's Journey®, and we'll succeed in that mission by doing the right thing.



**Dan Bartel**  
Chief Procurement Officer



**Doug Cotton**  
Chief Ethics & Compliance Officer

# Key expectations

## Safe and respectful workplaces

**Forced labor**—Suppliers don't use prison labor, forced labor, or child labor and don't engage in slavery or the trafficking of people.

**Discrimination**—Suppliers don't discriminate based on race, color, national origin, age, gender or gender identity, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, marital status, or protected veteran status in hiring and employment practices.

**Abuse of labor**—Suppliers treat all employees with respect and dignity. Suppliers don't subject employees to harsh or inhumane treatment including any corporal, physical, mental, sexual, or verbal harassment or abuse.

**Compensation and working hours**—Suppliers follow wage and benefits laws governing work hours and overtime.

**No retaliation**—Suppliers provide an environment that lets employees ask questions or raise concerns without fear of retaliation.

**Safety**—Suppliers provide a safe and healthy work environment and make sure policies, procedures, and training are followed to prevent accidents and injuries.

## Ethical workplaces

**Confidential information**—Suppliers safeguard American Airlines' confidential information and don't use inside information to trade our securities.

**Books and records**—Suppliers prepare and provide accurate information related to our business relationship and don't falsify or conceal records or requests for payment.



**Gifts**—Suppliers know and follow American Airlines' gift and hospitality policies when giving gifts or providing hospitality to American Airlines team members.

**Improper payments**—Suppliers don't pay or offer bribes or kickbacks to American Airlines team members or to third parties on our behalf.

**Fair competition**—Suppliers follow all competition laws that govern the jurisdictions in which they conduct business.

**Protecting the environment**—Suppliers strive to be environmentally conscious and conduct operations to minimize negative effects on the environment and natural resources.

**Environmental compliance**—Suppliers ensure their operations follow all environmental laws related to permits and reporting, air emissions, wastewater, and waste management.

# Table of Contents

## 1 **Our Standards**

1 Why American Airlines has Standards for Suppliers

1 Violations of the Standards

1 Ask questions and voice your concerns

## 2 **Our commitment to our team members and to safety**

2 Suppliers provide respectful workplaces

3 Suppliers protect the health and safety of colleagues and customers

## 4 **Our commitment to our companies**

4 Suppliers protect American's confidential information

4 Suppliers respect American's intellectual property

4 Suppliers don't trade on inside information

4 Suppliers maintain accurate books and records

## 5 **Our commitment to fair competition**

5 Suppliers compete fairly

5 Suppliers conform to formal bidding requirements

5 Suppliers are careful with gifts and hospitality

6 Suppliers follow strict gift rules for government officials

6 Suppliers follow trade control laws and regulations

## 7 **Our commitment to our business partners and others**

7 Suppliers respect the confidential information of others

7 Suppliers respect the intellectual property of others

7 Suppliers take privacy obligations seriously

7 Suppliers deal fairly with the government

## 8 **Our commitment to our communities**

8 Suppliers support diversity

8 Suppliers protect the environment

## Our Standards



### **Why American Airlines has Standards for suppliers**

American Airlines is committed to the highest standards of ethical conduct, labor standards, safety, and environmental protection and we expect our suppliers worldwide to share our commitment. While the Standards provide some detailed guidance, they cannot address every situation you might face. We rely on you to exhibit the values we share when conducting business with us—always act with honesty and integrity, exercise good judgment in making decisions, and seek help when you have questions about the right course of action. Remember, the best resource about what’s right or wrong is your own conscience.

### **Violations of the Standards**

If your conduct as a representative of American Airlines violates the law or these Standards, there can be grave consequences for both you and us, including loss of future business, reputational damage, and substantial civil or criminal penalties. So you must follow the Standards and all laws applicable to operating your business and your relationship with us.

### **Ask questions and voice your concerns**

If you have questions about your obligations under the Standards, please contact your business partner at American Airlines, your company’s legal or compliance officer, or American’s EthicsPoint helpline at 877-422-3844 or [aa.ethicspoint.com](http://aa.ethicspoint.com).

## Our commitment to our team members and to safety

### Suppliers provide respectful workplaces

We expect you to provide a work environment free from all forms of labor abuse, unlawful harassment and discrimination. You should uphold the human rights of your workers and treat them with dignity and respect. You should meet these requirements:

**Laws and regulations**—Suppliers follow all laws in the making and distribution of products and supplies for us and when providing services to us.

**Forced labor**—Suppliers don't use forced or bonded labor (including debt bondage), indentured labor, or prison labor and don't engage in slavery or the trafficking of people. Upon request, Suppliers provide us access to personal documentation (e.g., government-issued identification, passports, or work permits) and pay agency recruitment and/or employment fees and expenses.

**Child labor**—Suppliers comply with Article 3 of ILO Convention 182 (Worst Forms of Child Labour Convention, 1999). Any labor or services offered or provided by children under 18 must not be (1) mentally, physically, socially, or morally dangerous to them; (2) interfere with their schooling by depriving them of the opportunity to attend school, leaving school prematurely, or requiring them to combine school attendance with excessively long and heavy work; or (3) contrary to the laws where Suppliers operate.

**Working hours**—Suppliers follow laws and industry standards related to work hours and overtime.

**Wages and benefits**—Suppliers follow wage and benefits laws and collective bargaining agreements.

**Abuse of labor**—Suppliers follow laws on abuse of employees and prohibit harsh or inhumane treatment, including any racial or sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, or verbal abuse of workers.

**Discrimination**—Suppliers don't discriminate based on race, color, national origin, age, gender, gender identity, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, marital status, or protected veteran status in hiring and employment practices.

**No retaliation**—Suppliers have a process for employees to ask questions or raise concerns without fear of retaliation.

**Freedom of association**—Suppliers follow laws on freedom of association and collective bargaining. They respect the rights of workers to associate freely, seek representation, and join labor organizations or workers' councils.

### What do I do if I suspect human trafficking?

Call local law enforcement or the National Human Trafficking Resource Center (NHTRC) at 888-373-7888. If you live outside of the United States, please call your nation's human trafficking hotline.

## Our commitment to our team members and to safety



### Suppliers protect the health and safety of colleagues and customers

Suppliers follow health and safety requirements and ensure they meet these requirements:

**Occupational safety**—Suppliers control worker exposure to potential safety hazards through proper design, engineering and administrative controls, preventive maintenance, safe work procedures, and ongoing safety training.

**Occupational injury and illness**—Suppliers have procedures and systems to prevent, manage, track, and report occupational injury and illness.

**Emergency preparedness**—Suppliers have emergency plans and response procedures.

**Sanitation and food**—Suppliers provide workers with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities.

**Drug-free workplace**—Suppliers' employees and contractors don't engage in any work for us while under the influence of substances that might impair their ability to work safely. In addition, suppliers' employees and contractors may not possess illegal drugs or controlled substances while at our facilities or while conducting business for us.

## Our commitment to our companies



### **Suppliers protect American's confidential information**

We protect our confidential information because it's one of our most valuable assets. Confidential information includes all information that we have not publicly disclosed, including things like product information; nonpublic financial information; business strategies; contract terms; employment and personnel information; information about our relationships with customers, suppliers, or government agencies; and any other information that gives us a competitive advantage.

Suppliers protect and don't disclose to others our confidential information. Remember that the responsibility for protecting confidential information may continue even after our business relationship ends.

### **Suppliers respect American's intellectual property**

Our intellectual property includes patents, trademarks, copyrights, and trade secrets. Suppliers may not use our intellectual property except as allowed by written agreement with us. Any nonbusiness use, unauthorized use, or misuse of intellectual property can jeopardize its protection and value and may also be theft.

### **Suppliers don't trade on inside information**

Suppliers may not trade (or tip others to trade) securities of American Airlines or other companies based on material nonpublic—or inside—information obtained because of their work for us. Material nonpublic information is any information a company has not publicly disclosed that a reasonable investor would consider important in deciding to evaluate, buy, hold, or sell securities. Examples of material nonpublic information include financial results or forecasts, adverse changes in liquidity, major new products or services, significant capital spending, major contract awards or cancellations, merger or acquisition proposals, significant developments in litigation, and organizational changes such as layoffs.

### **Suppliers maintain accurate books and records**

Suppliers prepare all business documents reflecting our business relationship completely and honestly and record all transactions in a way that fully and fairly reflects the underlying financial affairs or transactions. Falsifying or concealing records or mischaracterizing payments violates these Standards and the law.

Suppliers accurately report requested data and promptly provide it to us. This reporting includes information about lead times, quality control specifications, prices, invoices, capacity, types of products and services, and risk and safety information.

## Our commitment to fair competition

### **Suppliers compete fairly**

We're committed to open and fair competition and conducting our business ethically and lawfully in every geographic location where we do business. This means we are free from any form of bribery, kickback, or corruption. Suppliers never pay or offer bribes or kickbacks to an American Airlines team member or to any third party on our behalf, including any government official or employee. Bribes or kickbacks can include anything of value (including money, gifts, services, offers of employment, fee waivers, free tickets or upgrades, or political or charitable contributions) and there is no exception even for the smallest of items.

Suppliers follow competition laws that govern the jurisdictions in which they conduct business. Suppliers may not participate in any agreement with competitors to fix prices, divide markets, limit or restrict supply of services, or undermine the integrity of any competitive bidding process. Suppliers may also not agree with competitors to fix employee wages or agree not to solicit or hire each other's employees.

We don't participate in foreign boycotts that the U.S. government does not sanction, and suppliers, while acting on our behalf, must not do so either.

### **Suppliers conform to formal bidding requirements**

We seek the most qualified suppliers through formal bidding processes. We will notify all qualified suppliers when there is an immediate need for products or services. Suppliers that attempt to navigate around the formal bidding process will be disqualified from formal selection.

### **Suppliers are careful with gifts and hospitality**

We want to make sure we transact business based on the merits of our products and services and those of our vendors. Since giving or receiving gifts or hospitality can compromise objectivity or give the appearance that someone is trying to influence a business decision, we want our suppliers to know the gift and hospitality policies that our team members follow so you don't cause inadvertent violations.

Our team members may not accept gifts of cash or cash equivalents (such as Visa and Mastercard gift cards and other prepaid cards) in any amount, nor may they accept any gift or hospitality that is illegal or is part of an agreement to do or give something in return.

Our team members may occasionally give or receive a small token gift or memento valued at up to \$100 to or from a current or potential business partner if there is no actual or perceived undue influence involved. Team members may also accept an infrequent gift card for \$25 or less for consumable items (e.g., Starbucks gift card). American's Business Ethics & Compliance Office must approve any exceptions.

## Our commitment to fair competition

Our team members may normally accept an infrequent meal or other entertainment if it's of reasonable value and the purpose of the meeting or attendance at the event is business-related. And our team members may generally accept items or services customarily provided to all company or travel industry employees, such as discounts on purchases or discounted travel arrangements.

Our team members and members of their immediate family may not accept commissions, a share of profits (or other payments), loans, preferential treatment, or lavish or excessive hospitality from any individual or organization doing, or seeking to do, business with us.

### **Suppliers follow strict gift rules for government officials**

Suppliers may not directly or indirectly offer or provide gifts or hospitality to any government official or employee (U.S. or non- U.S.) on our behalf. American's Ethics Office must approve any exceptions in advance.

### **Suppliers follow trade control laws and regulations**

When a supplier's business with us includes international trade, suppliers follow all laws governing (a) the export, re-export, and retransfer of goods, technical data, software, and services; (b) import of goods; and (c) economic sanctions and embargoes.

Suppliers provide us with required product specifications and pertinent documentation to ensure compliance with applicable export and import laws.

Suppliers have practices and procedures to ensure the security of their supply chains under, and as applicable, the World Customs Organization's Authorized Economic Operator (AEO) standards, the Customs-Trade Partnership Against Terrorism (CTPAT) initiative of the U.S. Customs and Border Protection, and related global supply chain security programs in the countries where suppliers work with us.



## Our commitment to our business partners and others



### **Suppliers respect the confidential information of others**

We may have confidentiality obligations under the terms of contracts that we have with third parties and the information they provide us. This includes keeping their software, source code, and other confidential information confidential from anyone not allowed to receive it. We treat the confidential information of these third parties with the care required by our confidentiality obligations and the same care with which we treat our own confidential information. While acting for or on our behalf, suppliers must do the same. Failure to do so could put both you and us at significant legal and financial risk.

### **Suppliers respect the intellectual property of others**

Under United States copyright laws, it's illegal to share or make a copy of copyrighted material (including books, videos, CDs, MP3 files, or computer software) to realize a commercial advantage or a private gain. Never reproduce copyrighted material or use any copyrighted work in a way not allowed by the copyright owner when acting on our behalf.

### **Suppliers take privacy obligations seriously**

We receive and maintain personal data about our customers and team members and take measures to make sure it's adequately protected. Personal data is any information relating to a person that, either directly or indirectly, can be used to link to that person's identity. If you have access to our personal data, you must maintain its confidentiality, follow our customer-facing Privacy Policy and our internal Privacy Policy for any proposed use of it, and adhere to any laws that allow for securely maintaining it.

We encourage suppliers to protect the reasonable privacy expectations of personal information of everyone they do business with, including their suppliers, customers, consumers, and employees, and to follow privacy and information security laws and regulatory requirements if they collect, store, process, transmit, or share personal information.

### **Suppliers deal fairly with the government**

Our policy is to maintain the highest standards of legal and ethical conduct in transacting business with the United States government and we expect our suppliers to do the same. We don't submit false claims in connection with government contracts, nor do we conceal, avoid, or decrease a legitimate obligation to pay the government. In addition, we require suppliers to tell us if they are or become debarred, suspended, or proposed for debarment by any agency of the United States government.

## Our commitment to our communities

### Suppliers support diversity

We are committed to supplier diversity by providing small, minority, LGBTQ, veteran, and women-owned businesses the opportunity to compete for our contracts. We expect the same efforts from our suppliers when selecting and maintaining qualified suppliers. Suppliers will inform us about their use of diverse suppliers upon request.

### Suppliers protect the environment

We are committed to protecting the environment. Our approach is influenced by our environmental policy statement, which outlines our environmental commitments. We expect suppliers to promptly address any situation that results in the unauthorized discharge or emission of pollutants into the air, ground, or water, and we expect our suppliers to commit to protect the environment. In their operations, suppliers should minimize adverse (and potentially adverse) effects on the environment, natural resources, and community by following these requirements:

#### **Implement an environmental management system (EMS)—**

Suppliers have an EMS that defines roles and responsibilities within the company.

**Monitor, review, and audit performance—**Suppliers develop and monitor progress against environmental goals and, if asked, provide American Airlines with performance information.

**Environmental and hazardous material training—**Suppliers ensure employees receive required environmental training and maintain accurate training records.

**Adopt sustainable business practices—**Suppliers seek to use natural resources efficiently and consider emissions, fuel and energy use, materials management, building efficiency, noise pollution, local air quality, water consumption, and the protection of natural resources and wildlife in business decisions.

**Report publicly and annually—**Suppliers provide clear, transparent information about how they manage key environmental issues they encounter in their business.



## Our commitment to our communities



**Environmental permits and reporting**—Suppliers maintain all required environmental permits, approvals, and registrations and keep current their operational and reporting requirements.

**Pollution prevention and resource reduction**—Suppliers reduce or eliminate at the source waste of all types, including water and energy, by practices such as modifying production, maintenance, and facility processes; materials substitution; conservation; and recycling and reusing materials.

**Hazardous substances**—If released into the environment, suppliers promptly identify and manage hazardous chemicals and other materials to ensure their safe handling, movement, storage, use, recycling and reuse, and disposal.

**Wastewater and solid waste**—Suppliers characterize, monitor, control, and treat wastewater and solid waste as legally required before discharge or disposal.

**Air emissions**—Suppliers characterize, monitor, control, and treat air generated from operations as legally required before discharge.

**Greenhouse gas emissions**—Suppliers measure their greenhouse gas emissions to their best ability and, if asked, provide American with their emissions information.

**Biodiversity**—Suppliers take steps to prevent ecological damage, considering their impact on local ecosystems, and to prevent deforestation and other environmental risks.

**Respect for wildlife**—Suppliers don't engage in the illegal wildlife trade or the smuggling of live animals, animal parts, or animal products.

Where appropriate, we encourage suppliers to seek product certifications to prove and validate their sustainable practices.