

Amex Ethics Hotline

Colleague Report 2019

2018 DATA



Amex Ethics
— HOTLINE —
recognize | report | resolve



Speaking up is one of the ways we protect the integrity of our brand and ensure we deliver on our Blue Box values.

It is everyone's right and responsibility to speak up, no matter where in the company you sit. We want everyone to feel comfortable bringing forward issues or concerns, which helps foster a safe, secure and ethical workplace.

The **Amex Ethics Hotline** was introduced in May 2017 as the company's newest resource for colleagues and others to report potential ethical or compliance matters without fear of retaliation – when and how they want. The Hotline is accessible 24 hours a day, seven days a week either by phone or online in multiple languages. The Amex Ethics Office, or AEO, reviews and insures proper handling of reports to the Hotline as well as from other channels.

The enclosed report provides an overview of reports submitted to the Hotline and the AEO in 2018. Going forward, we will publish an annual report in the first quarter.

At American Express we do what's right and we back our colleagues. Misconduct is treated seriously and strong actions are taken to address such behavior.

As always, you may ask questions or discuss concerns with your direct leaders, Employee Relations, Human Resources, Compliance, the General Counsel's Organization, or as otherwise provided under local reporting procedures. If you are not comfortable reporting an issue in this manner, you may choose to make a confidential and anonymous (in most markets) report via the [Amex Ethics Hotline](#).



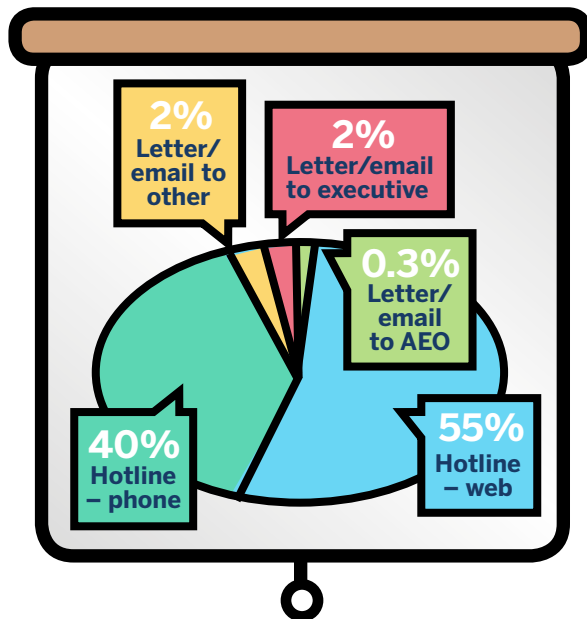
Laureen Seeger, Chief Legal Officer

Amex Ethics Office and Hotline

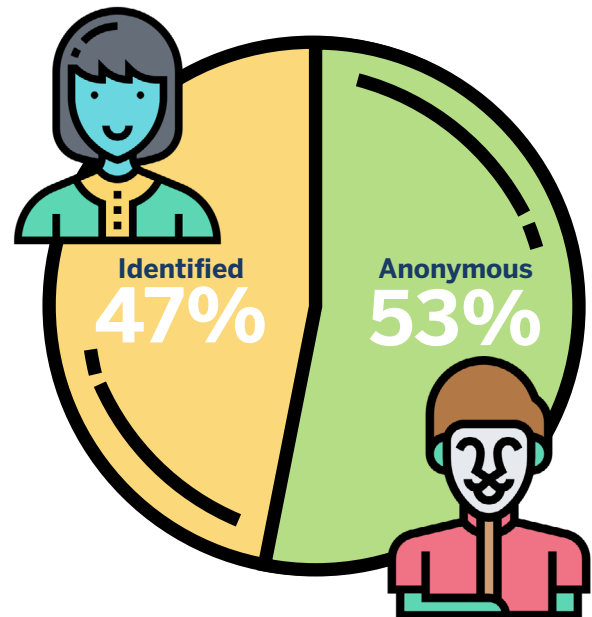
Key Metrics

Data represents the 615 reports received during 2018.

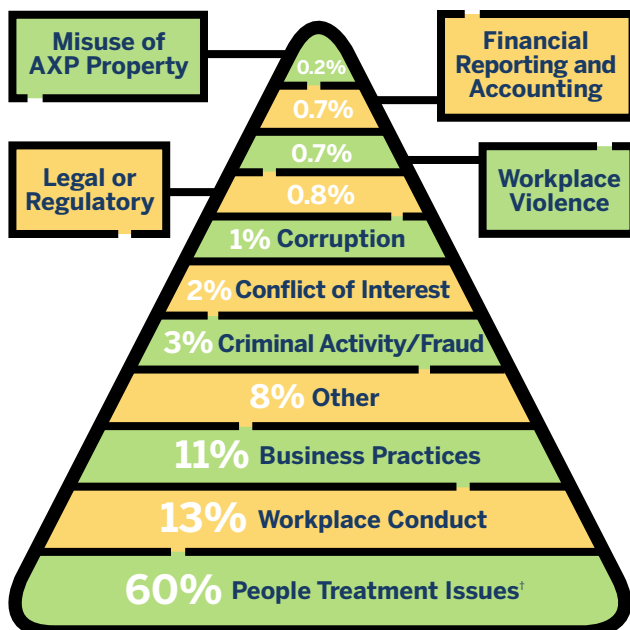
INTAKE METHOD



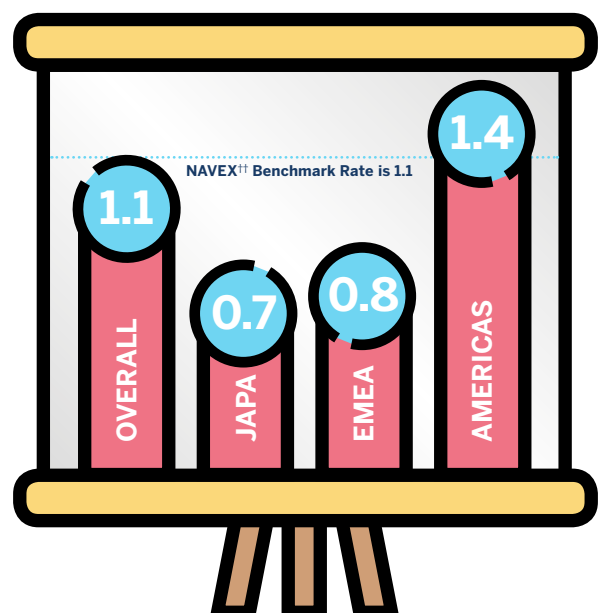
REPORTER IDENTIFICATION



ISSUE TYPES



UTILIZATION RATES**



Issue Type statistics are similar to our peer companies who also use NAVEX Global, Inc.

[†] Concerns about how colleagues are treated at work – for example, leader respect/treatment, performance management, and interpersonal conflicts between colleagues (bullying, harassment, discrimination, etc.)

**Utilization rate indicates number of reports per 100 colleagues.

^{††} NAVEX Global, Inc. is the third party vendor that hosts the Amex Ethics Hotline, thereby facilitating the Hotline's independence and confidentiality.

Amex Ethics Hotline Reporting Process

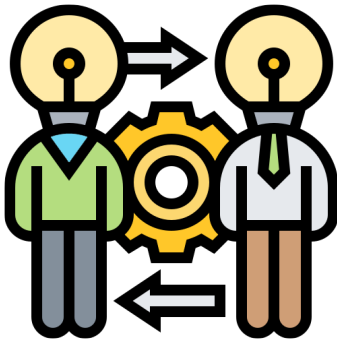


Issue or concern submitted through local phone number or online @amex.ethicspoint.com

Reporter can remain anonymous* or add contact details

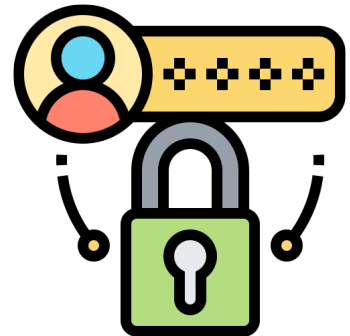


NAVEX Global document report, send to Amex Ethics Office



Report Key provided to Reporter to check progress on case

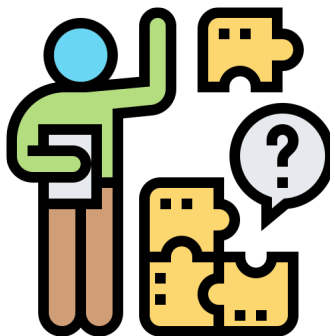
Password set up by Reporter



Amex Ethics Office review case and refer to appropriate internal investigation group



Internal investigators ask questions of the Reporter through Hotline, if needed



Confidential investigation conducted by the internal investigators

Final resolution of the report is logged in the Hotline for reporting purposes



Report updated to inform Reporter when the investigation is complete (Actions taken as a result of a report are often confidential and cannot be shared)

*In most markets

The **Amex Ethics Hotline** is a channel designed to report ethical and compliance matters including, but not limited to, those related to American Express colleagues or leaders and the principles in the company's Code of Conduct, such as financial reporting and accounting; corruption, fraud or other criminal activity; and workplace conduct.

EXAMPLE 1

Push down expenses

A colleague submits a report via the Amex Ethics Hotline website, expressing concern that Leader is charging business dinners to their EA's corporate card, which Leader then approves. The Reporter suspects that Leader does not use their own corporate card because they are dining in lavish restaurants with expensive tabs, which would not be approved by their leader. The Amex Ethics Office reviews the case and refers it to Internal Audit, who investigate the allegation with the help of additional information requested and provided by the Reporter confidentially through the Hotline system. The investigation finds evidence that Leader has indeed 'pushed down' their expenses in violation of the Global Travel, Meetings, and Expense Policy (AEMP 26), and is subject to disciplinary action.



EXAMPLE 2

Taking confidential information upon termination of employment

Ashley walks past Colleague's desk and notices that Colleague is sending an email with several attachments to a personal email address. Aware that Colleague has recently announced they were resigning from Amex to assume a role outside the company, Ashley suspects that Colleague may be sending company files to their own personal email account for future reference. Ashley calls the local toll free Amex Ethics Hotline number and speaks to a NAVEX call handler who records Ashley's concerns and sends the report to the Amex Ethics Office. Upon review, the Amex Ethics Office refers the case to Global Security, who investigate the report in conjunction with Employee

Relations. The subsequent investigation reveals that some of the documents being sent to the personal email address contain proprietary information and the Company takes action against Colleague.



Thanks to Reporters using the Hotline to highlight concerns such as these, American Express can abide by our commitment to maintain the highest standards of ethical conduct and integrity.

Did you know that the Amex Ethics Hotline...



... is completely
confidential

... is available to
all colleagues
including contractors

... allows you
to report and
communicate
anonymously*

...Because at American Express we do what's right.

*In most markets



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