Policy Reference & Name:	AEMP06 – Global Anti-Corruption Policy
Effective Date:	September 9, 2019
Policy Sponsor:	EVP, Chief Compliance Officer
Policy Custodian:	VP, Global Anti-Corruption
Policy Overseer:	N/A – 2nd Line Owned Policy
Approval Requirement:	Approval Level Required: ***Level 3*** Level 1: *N/A* Level 2: *N/A* Level 3: *AML Risk Management Committee* Level 4: Policy Signatories
Level 4 Policy Signatories:	1. Policy Sponsor – EVP, Chief Compliance Officer 2. Policy Overseer – N/A – 2nd Line Owned Policy
Policy Scope:	American Express Management Policy
Next Scheduled Review:	
Target Approval Date:	September 2020
No Later Than	November 2020
Changes to Previous Policy:	• Language clarification and simplification • Added Third Party definition section • Clarified responsibilities regarding on-boarding of Third Parties • Expanded definition of Bribery to include relatives and close associates • Added Financial Intelligence Unit section • Added Hiring section • Updated Training requirements and added additional information regarding anti-corruption resource guides

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1.0 OVERVIEW AND PURPOSE

American Express Company ("American Express" or the "Company") prohibits Bribery (as defined in Section 3.1) of any kind. American Express maintains an anti-corruption program, consisting of this Anti-Corruption Policy ("Policy") and related guidelines, procedures, and controls, designed to comply with anti-corruption laws and regulations, as applicable (the "Anti-Corruption Program").

As a global company, headquartered in the United States and with offices and operations around the world, American Express, its employees, and Third Parties (as defined in Section 3.2) are subject to the U.S. Foreign Corrupt Practices Act ("FCPA"), the United Kingdom's Bribery Act of 2010 ("UK Bribery Act"), and other anti-corruption laws and regulations, some of which may be more stringent in their prohibitions. Any conflicts or questions regarding laws and regulations should be referred to the General Counsel's Organization ("GCO") and Global Compliance & Ethics ("GCE").

Generally, under the FCPA and other anti-corruption laws, it is a crime to provide Anything of Value (as defined in Section 3.5.1) to a Government Official (as defined in Section 3.3) with the purpose of influencing improperly any decision or obtaining an improper advantage. The FCPA also requires issuers of U.S. securities, which includes American Express, to make and keep accurate books and records and to devise and maintain an adequate system of internal accounting controls. Under the UK Bribery Act, commercial bribery, the receipt of a bribe, and a corporate offense of failing to prevent Bribery are also criminal activities.

This Policy establishes standards, consistent with the **American Express Code of Conduct** and other American Express policies, designed to prevent the misuse of Company funds to further corruption; to protect the Company and its employees from criminal and civil liability by prohibiting activities that violate applicable laws; and to prevent employees and Third Parties from engaging in Bribery on the Company's behalf.

2.0 SCOPE

This Policy establishes the enterprise-wide minimum standards that must be followed by the Company, its employees, lines of business, staff groups, controlled entities, and Third Parties to ensure a sound and effective Anti-Corruption Program.

3.0 KEY DEFINITIONS

Bribery - Bribery is giving or receiving Anything of Value to or from anyone to influence actions or decisions improperly or to obtain an improper advantage.[1] Bribery includes improper exchanges involving Government Officials, non-government parties, such as private company

[1] Sections 1 and 2 of the U.K. Bribery Act 2010.

officials or employees, and relatives and close associates.[2]

Bribery is broadly construed to include direct and indirect offers, promises, gifts, requests, and acceptances of Anything of Value with intent to influence actions or decisions improperly or to obtain an improper advantage. It is not relevant whether the person receiving the advantage is the same person who is performing the function or activity.

Third Party – A Third Party is a non-affiliated person or entity that has entered into a business relationship with American Express to provide goods and/or services or to serve as an external business partner.[3]

Government Official – Any elected official, officer, or employee of a government or any department, agency, or instrumentality of a government at any level (national, state, or local), including any judicial, legislative, or administrative official, officer, or employee, or member of a ruling family;

- Any political party or official of a political party;
- Any candidate for political office;
- Any employee, officer, agent, or other representative of a State-Owned or State-Controlled Entity (defined in Section 3.4 of this Policy);
- Any officer or employee of a public international organization (such as the United Nations, the World Bank, or the International Monetary Fund); and
- Any other person acting on behalf of an entity or person listed above.[4]

State-Owned or State-Controlled Entity - A State-Owned or State-Controlled Entity is defined as any organization owned or controlled, directly or indirectly, by a government at any level (national, state, or local) or any department, agency, or instrumentality thereof. Examples of State-Owned or State-Controlled Entities include state-owned banks and airlines, sovereign wealth funds, public pension funds, and public utilities. Entities ultimately owned or controlled by State-Owned or State-Controlled Entities are also State-Owned or State-Controlled Entities.

Because ownership and control are not identical, absent explicit guidance from GCO, employees should treat any company that is ultimately more than 50% owned by a government (at any level) as a State-Owned or State-Controlled Entity. It is also possible for an entity that is less than 50% owned by a government to qualify as a State-Owned or State-Controlled Entity, typically when the government has significant control rights despite having only minority ownership

Payments or Provisions of Benefits - Payments or provision of Benefits (as defined in Section 5.5.1) includes offers, promises, or gifts of money or Anything of Value. It also includes authorization to offer, promise, or give money or Anything of Value.

[2] See: *A Resource Guide to the U.S. Foreign Corrupt Practices Act*, November 2012, at 16.
[3] This definition does not apply to Third Parties considered Low-Risk and Low-Value per AEMP 10: Third Party Management Policy.
[4] Foreign Corrupt Practices Act of 1966, 15 U.S. Code § 78dd–1, (f)(1)(A) and (f)(1)(B); and Section 6(5), 6(6) of the UK Bribery Act 2010.

a. **Anything of Value -** Anything of Value is defined broadly to include both financial and non-financial Benefits. Examples include travel, entertainment, interest in contracts, employment opportunities, fees in excess of market rate, discounted or free products or services, and donations to a charity favored by a Government Official.[5] ***There are no exceptions to the Anything of Value definition even for small or de minimis amounts.***

Relevant Function or Activity - A Relevant Function or Activity is defined as any function of a public nature, any activity connected with a business, any activity performed in the course of a person's employment, or any activity performed by or on behalf of a body of persons where a person performing the function or activity is expected to perform it impartially and in good faith or is in a position of trust by virtue of performing the function or activity.[6]

Routine Governmental Action - Routine Governmental Action is any action that is commonly performed by a Government Official upon request and without exercising any discretion.[7] Examples include the issuance or delivery of permits, licenses, or visas, customs clearance, delivery of mail, or telephone and utility hook ups.[8] Routine Governmental Actions would not include, for example, consideration of an application for a service or privilege that is only selectively available, where the government may review a variety of circumstances or competing requests and may use its discretion to choose among them.[9]

Facilitating of Expediting Payments - Facilitating or expediting payments, also known as grease payments, are typically payments of small value, customarily demanded by clerical or lower level government employees, to take Routine Governmental Action to which the Company is entitled without the need to make a payment.[10]

4.0 ROLES & RESPONSIBILITIES

A. Senior Management – Senior Management of the Company is responsible for setting the "tone at the top" regarding the importance of the Company's Anti-Corruption Program and complying with its requirements.

B. Business Units, Staff Groups, and Legal Entities - Business units, staff groups, and legal entities are responsible for ensuring the requirements of the Anti-Corruption Program are implemented within their respective areas, including:

- Assessing the corruption risk based on the government touch points and the specific products, services, and markets involved;

[5] See: *A Resource Guide to the U.S. Foreign Corrupt Practices Act*, November 2012, at 14-16.
[6] Section 3 of the U.K. Bribery Act 2010 c. 23.
[7] Foreign Corrupt Practices Act of 1966, 15 U.S. Code § 78dd–1, (f)(3)(A).
[8] Id.
[9] Foreign Corrupt Practices Act of 1966, 15 U.S. Code § 78dd–1, (f)(3)(B).
[10] Foreign Corrupt Practices Act of 1966, 15 U.S. Code § 78dd–1, (b).

- Ensuring that all on-boarding of Third Parties by the Company is consistent with this Policy and the **Guidelines on Third Parties;**

- Developing and implementing processes and controls designed to mitigate anti-corruption risk and ensure adherence to the Anti-Corruption Program requirements, including monitoring, self-testing, and reporting; and

Ensuring anti-corruption focused communications are distributed.

C. People Leaders - People leaders are also responsible for setting the "tone at the top" of their respective organizations and ensuring that employees adhere to the Anti-Corruption Program's requirements, including:

- Ensuring that employees are properly trained and supervised with regard to the potential for anti-corruption risk, particularly employees who deal with Government Entities, who manage the relationships with Third Parties that represent the Company before any government body or employee, or who are involved in new ventures;

- Ensuring that direct reports understand the customs or requirements of any market in which they operate, including markets in which there is contact with Government Officials, and escalate questions about any practice that seems inconsistent with this Policy; and

Undertaking disciplinary action in accordance with local laws and HR policies.

D. Employee- Employees are the Company's first line of defense against corruption and commercial bribery. It is every employee's obligation to report immediately to his or her people leaders and GCE any request for an improper payment or any suspicion that another employee or agent of the Company may be contemplating or may have made an improper payment.

Employees are required to comply with Anti-Corruption Program requirements, including:

- Understanding whether the persons and entities with which the Company is interacting are Government Officials or State-Owned or State-Controlled Entities and the enhanced requirements that may apply;

- Reporting and accounting for financial transactions (**AEMP 01: External Expenditures Approval**), including reimbursement of travel and other expenses and their purposes, in a timely and accurate manner (**AEMP 26: Global Travel, Meetings & Expense Policy**); and

- Providing clarification for any red flags identified from monitoring invoices and payments, anti-corruption due diligence on Third Parties, or Benefits submitted in the Amex Entertain Database.

Employees are also responsible for ensuring that Third Parties that they engage or interact with on behalf of the Company are knowledgeable about the Company's Policy and that the Anti-Corruption Program requirements are applied to Third Parties, as necessary, including:

- Ensuring that Third Parties that they engage undergo Anti-Corruption Due Diligence ("ACDD") and all other requirements in accordance with the **Guidelines on Third Parties**;
- Ensuring that any Third Party that acts as an intermediary to represent the Company before a governmental body undergo Enhanced ACDD, receive the **American Express Anti-Corruption Shared Values for Providers**, and complete anti-corruption training, as appropriate;
- Ensuring contracts contain appropriate language to address anti-corruption;
- Ensuring agreements for incentive programs are in accordance with the **Incentives Guidelines**; and
- Identifying and escalating any wrongdoing on the part of Third Parties to their people leaders, GCO, and GCE.

In no event will an employee be disciplined or retaliated against for making good faith report under this section or cooperating with an internal investigation. Employees may also anonymously contact the Amex Ethics Hotline, a confidential neutral resource for reporting ethical or compliance concerns. The contact information is available at https://square.americanexpress.com/community/gco/amex-ethics-office

E. Global Supply Management - Global Supply Management ("GSM") supports the operation of the Anti-Corruption Program in relation to Third Parties that the Company on-boards through GSM and executes certain processes designed to enable the Company to comply with regulatory expectations and mitigate potential corruption risk in accordance with the **Guidelines on Third Parties.**

F. Controllership and Global Financial Operations - Controllership partners with business units and staff groups across the Company to ensure financial integrity and a strong control environment. They are responsible for global reporting, financial control, the Sarbanes-Oxley Act, and technical accounting advisory functions across the Company.

The Global Financial Operations ("GFO") teams provide a variety of financial processing and accounting functions such as global business initiatives, payroll, card capture, accounting, reconciliations, management reporting, and payments.

Controllership and GFO Financial Center teams are responsible for reviewing disbursements and expenses in line with the **Guidelines for Third Parties** and in conjunction with the Financial Intelligence Unit ("FIU").

G. Financial Intelligence Unit - The FIU, in conjunction with GFO and Controllership, is responsible for monitoring payments and related activities using a risk-based approach to detect and mitigate potential corruption risk in line with the **Guidelines for Third Parties.**

H. General Counsel's Organization - GCO provides advice regarding the requirements of laws and regulations applicable to the Company, as necessary, including anti-corruption laws and regulations, risks, and contract language. GCO is also responsible for engaging outside counsel, as necessary.

I. Global Compliance & Ethics - GCE, a function under Global Risk, Banking & Compliance, is responsible for line of business, market, and anti-corruption compliance.

a. **Line of Business Compliance -** Line of Business Compliance Officers are responsible for advising the lines of business on developing procedures and controls, as needed, to ensure that Anti-Corruption Program requirements are implemented and sustainable across the lines of business
b. **Market Compliance -** Market Compliance Officers are responsible for advising the business units and staff groups in their markets on developing procedures and controls, as needed, to ensure that Anti-Corruption Program requirements are implemented and sustainable, and in compliance with local laws and regulations.
c. **Global Anti-Corruption -** Global Anti-Corruption ("GAC") is responsible for the day to day management of the Company's Anti-Corruption Program and providing advice and support to Line of Business Compliance, Market Compliance, and business unit staff.

   The Vice President of Global Anti-Corruption is responsible for leading the Anti-Corruption Program, establishing global minimum standards to mitigate corruption risk, and orchestrating strategy across the Company for managing potential risks associated with the Company's obligations under anti-corruption laws and regulations around the world

   GAC maintains a dedicated page on The Square, which provides American Express employees with anti-corruption information and resources, including related guidelines. The GAC page is located at https://square.americanexpress.com/community/grbc/global-compliance-ethics/gfcc/anti-corruption. GAC may be contacted at Anti.Corruption@aexp.com.

5.0 POLICY REQUIREMENTS

A. Prohibition on Bribery - The Company prohibits all forms of Bribery. The Company's funds or funds from any other source, including personal funds, may not be used to commit Bribery on behalf of or for the benefit of the Company. Third Parties are also strictly prohibited from engaging in Bribery in connection with their engagement with the Company.

Additionally, several of the Company's business partners and customers have established guidelines regarding what Benefits their employees may accept. American Express employees should not provide a Benefit to a business partner or customer that they know would be prohibited under that business partner or customer's own guidelines.
Compliance with Anti-Corruption Program requirements is required to protect the Company and its employees from possible criminal or civil liability and reputational harm. Failure to adhere to this Policy and related guidelines and procedures may result in disciplinary action, up to and including termination of employment. Employees should contact GCO and GCE immediately in emergency situations or circumstances involving duress.

B. Prohibition on Facilitating and Expanding Payments - American Express, its employees, and any Third Party engaged on its behalf are prohibited from making any facilitating, expediting, or grease payments, no matter what the circumstance or where the Company is doing business. This is true regardless of a custom or practice that may be prevalent in a location where American Express does business.

If a Government Official requests a facilitating payment from an employee, that employee must escalate the incident to GCO and GCE.

C. Business Activity with Public or Governance Organizations - The Company conducts business with governmental agencies, public organizations, State-Owned or State-Controlled Entities, and quasi-governmental entities, and as a normal part of this business, may provide goods and services, such as travel support, to such entities for fees assessed on an arm's length basis. Business groups should consult GCO and GCE before undertaking any significant government-related business or contracts.

D. Risk Assessment- American Express recognizes the importance of defining, mitigating, and managing its risks from corruption via an enterprise-wide, risk-based approach. As part of our risk-based approach, GAC coordinates a standalone Anti-Corruption Risk Assessment ("ACRA") for each business unit and market in which American Express does business. The ACRA in part leverages the results of the Annual Compliance Risk Assessment to identify and understand risks unique to those business units.

E. Meals, Gifts, and Entertainment

a. ***General -*** To further business relationships, it may be reasonable and necessary for the Company to provide training, host meetings, and provide other modest Benefits that are directly related to business or contract performance.

Meals, gifts, entertainment, or other items of value (referred to collectively as "Benefits") must be of reasonable value and must have a clear business purpose in accordance with the **Guidelines on Meals, Gifts, and Entertainment ("MGE Guidelines")** which establish Company-wide minimum standards for giving and accepting of Benefits.

Any Benefit to a Third Party that creates a corruption risk should not be provided. Whenever possible, gifts should bear the American Express logo and be centrally purchased through GSM. Gifts of cash and cash equivalents (such as Travelers Cheques and prepaid gift cards) are prohibited.

Benefits must be submitted by the employee for registration and approval in the Amex Entertain Database as required by the **MGE Guidelines**. The frequency and value of Benefits provided to Third Parties should be reasonable under the circumstances and in light of any potential or perceived corruption risk.

Refer to the **MGE Guidelines** available on the Anti-Corruption page of The Square for more details.

***b. Government Officials* -** Benefits are subject to additional restrictions and review when the recipient of the Benefit is a Government Official.

All Benefits must be of reasonable value and must have a clear business purpose. Any planned program, gift, hospitality, or entertainment, regardless of the dollar amount, that would give a Benefit to a Government Official must be submitted by the employee in the Amex Entertain database as required by the **MGE Guidelines.**

While it is not necessarily inappropriate to invite Government Officials to a client event or entertainment (such as a marquee sporting event), this type of a Benefit to a Government Official may require pre-approval in the Amex Entertain Database. Consult the **MGE Guidelines** and any local guidelines regarding dollar or local currency limits on Benefits provided to Government Officials.

F. Payment of Incentives - American Express business lines and staff groups may enter into agreements that include incentive programs to external business partners or their employees to improve performance standards. Conversely, American Express business lines and staff groups may enter into agreements whereby external business partners offer incentive programs to American Express employees to improve performance standards. Lines of business and staff groups that enter into agreements that include incentive programs are responsible for ensuring incentive programs are consistent with the **Incentives Guidelines**, the **Code of Conduct**, and other American Express policies and guidelines. When entering incentive programs with State-Owned or State-Controlled Entities, extra care should be taken to ensure the terms of such programs are not improperly more favorable than those generally available to private industry peers.

For more details, refer to the **Incentives Guidelines** available on the Anti-Corruption page of The Square.

G. Charitable or Political Contributions - Corporate contributions to charitable organizations must be made in compliance with **AEMP 22: Charitable Contributions**. Contributions to political candidates, parties, or causes must be made in compliance with **AEMP 27: Political Contributions, Lobbying Activities, and Provision of Gifts or Entertainment to Public Officials**. In some jurisdictions, local laws may impose more stringent limits on Benefits provided to Government Officials.

In addition, no American Express employee may make or offer to make a gift, donation, or other show of support to any person or entity, including a charity on behalf of or at the suggestion of a Government Official or other person with whom the Company conducts business, if the intent or result of such contribution would violate this Policy.

H. Third Parties - Company employees are required to ensure that Third Parties do not violate this Policy in connection with their engagement with American Express. In addition, employees are prohibited from encouraging any Third Party to do any act that would be prohibited by this Policy or from providing Anything of Value to a Third Party while knowing or suspecting that all or part of that thing of value is being used as a bribe or for any other corrupt purpose.

a. **Anti-Corruption Due Diligence -**Risk-based anti-corruption due diligence of Third Parties and of potential controlled entities and targets of merger or acquisition activity is required to evaluate corruption risk so that American Express can make informed decisions about whether to proceed with a relationship, and if so, how to mitigate any potential corruption risks. Diligence may include obtaining information, conducting research, investigating the background and reputation of a prospective Third Party and its representatives, or other means.

   When a Third Party is specifically retained to represent the Company before any governmental, administrative, judicial, regulatory, or quasi-governmental agencies or bodies (such as tax, customs, or regulatory authorities) or depends on any such body to perform its services or contract (that is, the Third Party is an intermediary), the business engaging the Third Party must ensure enhanced requirements are met as described in the **Guidelines on Third Parties**. Similarly, any Third Party retained to act as an agent with regard to obtaining or retaining business with a State-Owned or State-Controlled Entity must also meet the enhanced requirements in the **Guidelines on Third Parties.**

   Refer to the **Guidelines on Third Parties** available on the Anti-Corruption page of The Square for additional information.

I. Payments Monitoring - Employees are responsible for ensuring that expenses and payments made to Third Parties comply with Company policies and procedures and are supported by adequate documentation. FIU, in conjunction with GFO and Controllership, monitors payments and related activities using a risk-based approach to mitigate and detect potential corruption risk.

J. Hiring - It is strictly prohibited to hire any person, for paid or unpaid positions, in exchange for a favor, benefit, or influence. Heightened scrutiny should be given to the hiring of government officials, their immediate family members, and their referrals.

K. Anti-Corruption Training - Employees, contractors, and applicable Third Parties are responsible for completing required anti-corruption training. As prescribed by **AEMP 39: American Express Global Compliance Risk Management Policy**, business unit personnel and applicable Third Parties receive Regulatory Compliance Training to reinforce their understanding of applicable laws and/or regulations. American Express' training includes compliance regulatory awareness training and job-specific training that enables employees and applicable Third Parties to carry out their particular job functions appropriately. Global Anti-Corruption works closely with Global Regulatory Learning to develop content for anti-corruption trainings that are assigned to learners and tracked in the learning management system. For further information, please refer to the **American Express Global Regulatory Compliance Training Policy.**

In addition, Global Anti-Corruption has developed additional training resource guides on the following topics: **Amex Entertain User Guide**; **How to Identify a State Owned Entity Guide**; **Meals, Gifts, and Entertainment Approver Guide**; and **Anti-Corruption Due Diligence Approver Guide**. These are non-regulatory trainings that are available on the Anti-Corruption page of The Square.

L. Record Keeping and Reporting - American Express must maintain books, records, and accounts that accurately reflect transactions and dispositions of the Company's assets. Employees are required to record and report information on the Company's books and records in an accurate and timely manner. No employee may make or direct any other person to make any entry on the Company's books and records that intentionally hides or disguises the true nature of any transaction.

Employees are required to provide timely and accurate accounting of travel, entertainment, purchases, business related gifts, contributions, and other business expenses in conformance with applicable policies.

6.0 EXCEPTION / CONFLICT / INTERPRETATION RESOLUTION

Requests for exceptions to this Policy must be approved by the EVP, Chief Compliance Officer (Policy Sponsor). Exception approval requests must include an action plan and rationale, and must carry either an expiration date or a review date. Any identified exception to a policy that has not yet been approved must be escalated to the Policy Sponsor immediately. Approved policy exceptions do not constitute policy non-compliance.

The Policy Sponsor maintains documentation of exceptions, and the VP of Global Anti-Corruption (Policy Custodian) regularly reviews these exceptions to assess whether a policy change is required.

Exceptions to requirements in guidelines issued under this Policy may be approved by the VP of Global Anti-Corruption or his/her designee. All such requests are to be submitted using the Global Anti-Corruption Exception Request Form in Archer. Please contact Global Anti-Corruption for details.

7.0 POLICY APPROVAL REQUIREMENTS

The Custodian of this Policy is the VP of Global Anti-Corruption. This Policy is to be reviewed, updated, if necessary, and approved at least once annually but not more than 14 months from the approval date by the AML Risk Management Committee in accordance with **AEMP15: Policy Management and Framework**. In addition, all related guidelines are separately reviewed by the VP of Global Anti-Corruption at a minimum of once a year.

8.0 ENFORCEMENT OF ISSUED POLICIES AND PROCEDURES

All employees and agents of American Express are responsible for complying with applicable official American Express Company policies, procedures, standards, and programs. Senior management of each business, function, or regulated entity is ultimately responsible for ensuring adherence to policy within their organizations. Internal auditors and control groups, as applicable, review compliance with policy and procedure. **Noncompliance with issued policies or procedures is a breach of the terms of employment and may lead to disciplinary actions, which may include termination of employment or Third Party vendor agreement.**

9.0 POLICY IMPLEMENTATION

The Policy is effective as of the date indicated on the cover page.

10.0 RELATED POLICIES, REGULATORY GUIDELINES & SUPPORTING DOCUMENTS

This Policy should be read in conjunction with the following policies and guidelines, which are available on the American Express internal website, The Square, through the Policy Center at https://square.americanexpress.com/community/policy-center

- American Express Code of Conduct: sets forth the business ethical standards upheld by American Express and reiterates this Policy's prohibition against offering or accepting any improper payments, gratuities, or gifts that are given (or may appear to be given) with the intent to obtain or retain business or secure services.

- AEMP 01 – External Expenditure Approval: describes the roles and responsibilities of employees in the commitment of funds and authorization of payments to external parties. AEMP 01 also requires external expenditures to be in compliance with AEMP 06.

- AEMP 10 – Third Party Management: provides governance to and ensures the sustainability of the Third Party Management program, which reflects American Express' ongoing efforts to enhance internal controls related to the management of Third Parties. AEMP 10 requires that interactions with Third Parties be in line with requirements of AEMP 06.

- AEMP 22 – Charitable Contributions: sets forth the requirements for charitable contributions made on behalf of American Express and refers to the requirements of AEMP 06.

- AEMP 26 – Global Travel, Meetings, and Expense Policy: describes the principles under which employees may incur expenses in the normal course of business and claim reimbursements. AEMP 26 requires that expenses incurred by American Express employees in connection with the provision of Benefits such as meals, gifts, or entertainment (including travel) to external parties are governed by AEMP 06.

- AEMP 27 – Political Contributions, Lobbying Activities, and Provisions of Gifts or Entertainment to U.S. Public Officials: sets forth the procedures for political contributions, gifts, pre-approval for certain events and expenditures, lobbying on behalf of American Express, and contributions to trade associations used in connection with political activity. AEMP 27 references the requirements of AEMP 06.

- AEMP 37 – Controlled Entity Governance: applies to all American Express' controlled entities and states that AEMP 06 applies to the Company's controlled entities.

- AEMP 39 – American Express Global Compliance Risk Management Policy: describes the framework for American Express' corporate-wide compliance risk management program. AEMP 39 states that Anti-Corruption is in scope for AEMP 39, including the following subordinate policies: Global Compliance Risk Assessment Policy, Global Compliance Monitoring and Testing Policy; Global Compliance Issue Management Policy; and Global Regulatory Compliance Training Policy.

Anti-Corruption information and resources can be found on the GAC dedicated page on The Square at https://square.americanexpress.com/community/grbc/global-compliance-ethics/gfcc/anti-corruption. GAC may be contacted at Anti.Corruption@aexp.com.

11.0 REVISION HISTORY

This version of AEMP 06 supersedes the version previously published on November 2, 2018. Previous versions were issued and superseded prior versions on:

- September 19, 2017;
- July 1, 2016;
- July 1, 2015;
- July 1, 2013;
- July 1, 2011;
- April 1, 2006; and
- June 2001 (titled Expediting Payments).

12.0 APPENDICES

N/A