

AEMP10 – THIRD PARTIES & CATEGORIZATION OF THIRD PARTIES

What are the Third-Parties?

The term Third-Party refers to Suppliers, Service Providers and other external companies that support AXP|PAYBACK in providing goods and services to our customers. They are made up of two groups, Suppliers and Non-Suppliers. **Suppliers** are external companies that furnish goods and/or services to AXP|PAYBACK, including those that perform functions on its behalf (e.g., outsourcing providers). **Non-Suppliers** are external companies, such as Co-Brand Partners, that enter into a partnership with AXP|PAYBACK in order to achieve a mutual business objective, typically with both parties' trademarks presented to our customers.

Government Entity, Official & Intermediary

Government Entity

Government Entity means any (1) government at any level (e.g., federal, state, provincial, or local) or any department, agency, or instrumentality thereof, including but not limited to any State-Owned or State-Controlled Entity (SOE) (e.g., municipal-owned utility, hospital, medical school, university), whether or not performing public or private functions; (2) political party; or (3) public international organization.

Government Official

A Government Official is defined as:

- 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 an SOE;
- 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.

Intermediary

An Intermediary is a Third Party that may interact with Government Entities or Government Officials on behalf of AXP|PAYBACK to perform its services. The following is a list of common services that an Intermediary may provide and the categories under which they would normally be classified. The list is not exhaustive, and the classification might change depending on the country and Intermediary. Additional services and categories should be reviewed as needed.

- Any political party or official of a political party
- Government Relations
- Lobbying
- Public Relations
- Government Consulting Services (e.g., telephone line services in India or government consultants in China)
- Visa & Passport Processing
- International Freight, Custom Clearance, and Common Couriers
- International Trademarks and Patents
- Applying for building Permits/Work Permits/Liquor Licenses that are needed to complete the services
- Applying for specific Business Licenses on AXP|PAYBACK's behalf
- International Accounting and Financial Consulting (who prepare financial reports for regulators or external audit groups)
- Tax Preparation and Filing.

Note: While couriers are considered intermediaries because they may interact with customs officials, mailing services that are limited to the purchase of postage through USPS or local post offices are not considered intermediary services.

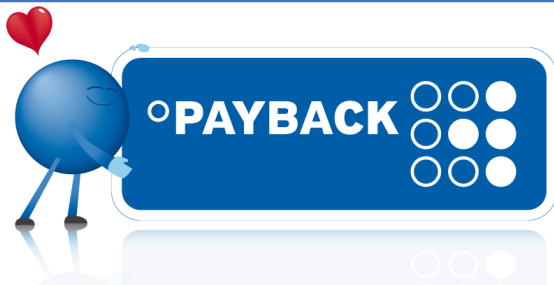




CATEGORIZATION OF THIRD PARTIES

1. In Scope Third-Party Categories

Category	Description / Examples	Policy Scope	Risk Requirements
Account Fulfillment	Supplier of account-level fulfillment services, including creating and sending welcome kits and billing statements, processing credit balance refunds, issuance of checks, and manufacturing, personalization and distribution of cards.	In-Scope	TLM
AENB Affiliate	Affiliates (e.g. TRS, AXP) are any company or business unit that (i) directly or indirectly controls the US bank (e.g., has the power to vote 25% or more of the voting securities), or (ii) is under common control of American Express.	In-Scope	Affiliate Management Program Office
Card Benefits	Third party based embedded card product benefits (e.g. Saks, Equinox) that facilitate the deployment of rationale and/or experiential value of services to card members. This category was previously named "Reward Fulfillment."	In-Scope	TLM
Co-Brand Partner	Third party that offers products, including but not limited to, credit cards (including related sales and marketing services) which are jointly sponsored by American Express and another entity, such as a retail merchant, airline, bank, etc.	In-Scope	TLM
Collections and Credit	Supplier of collection services for unpaid, past-due debts.	In-Scope	TLM
Customer Service	Supplier of direct-to-customer servicing through any channel, e.g., phone, online, or in-person. Includes both outbound and inbound services, and additional examples: Disputes and Credit Balance Refunds Request.	In-Scope	TLM
Data Broker/Aggregator	A Data Broker / Aggregator is a business that collects information from a variety of sources; processes it to enrich, cleanse or analyze; and may license information to other organizations. Data brokers can also license another company's data directly or process another organization's data to provide them with enhanced results. Data may include both public and non-public Personal Data, including but not limited to credit bureaus, data appends, data lists and market reports. These services may include American Express first sharing customer data with third-party to match, scrub, and append additional information.	In-Scope	TLM
Data Capture and Management	Supplier of data capture, maintenance, and/or management services pertaining to customers, colleagues, or others.	In-Scope	TLM
Data Center	Supplier of goods and services related to data processing, data backup and data storage capabilities.	In-Scope	TLM
Distribution	Supplier of distribution for AXP PAYBACK products and/or services.	In-Scope	TLM
Government Relations Consultants	Supplier that is specifically retained to represent American Express before a government body or government employee or depends on such government body or government employee to perform its services or contracted activity. Examples include lobbyists and trademark agents.	In-Scope	TLM
Hardware	Supplier of goods, such as office supplies, furniture, and technology hardware where services are limited to the sale/delivery of goods and do not include maintenance after initial delivery.	In-Scope	TLM
Human Resource Services	Supplier of human resource services and functions, such as colleague recruitment, relocation, learning, aviation, benefits and coaching.	In-Scope	TLM
Insurance (Colleague)	Insurance that is for the benefit of AXP PAYBACK colleagues	In-Scope	TLM
Insurance (Product Benefit)	Coverage for the benefit of Card Members or other customers of AXP PAYBACK	In-Scope	TLM





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Category	Description / Examples	Policy Scope	Risk Requirements
Lead Generation	Third party responsible for initiating contact with potential and/or current customers to generate and qualify leads based on AXP PAYBACK criteria. The third party could receive a file from AXP PAYBACK or generate leads based on their own customer base. The third party will share all leads back to AXP PAYBACK who will engage the prospective customers directly to complete Sales activity/process applications. The lead generation partner does not sell, market or solicit for AXP PAYBACK in any way.	In-Scope	TLM
Market Research	The third party will provide primary product/user research capabilities to American Express. The third party conducts quantitative research which consists of obtaining data (via online, phone, mail or in-person, surveys interviewing) or qualitative research which is interviewing AMEX customers and/or prospects (Focus Groups) to obtain ideas and insights about a particular topic.	In-Scope	TLM
Marketing and Advertising	Supplier of services related to the creation, communication, messaging, and/or delivery of the American Express brand image and product offerings. This includes, but is not limited to, categories such as: Branding, Communications, Creative Services, Marketing Consulting, Media Buying, Point of Purchase Materials, Print, Promotional Items, Talent Agencies.	In-Scope	TLM
Membership Rewards Merchandise Partners	Partner gives cardmember ability to make purchases from using membership rewards points (shop with points).	In-Scope	TLM
Memberships and Subscriptions	Corporate level memberships to professional organizations or trade associations and corporate level subscriptions to data services and syndicated data resources such as market intelligence providers. Examples include MNSDC, WBENC, The Hackett Group, Center for Workplace Compliance, etc.	In-Scope	TLM
Merchant Acquirers / Recruitment	Supplier of merchant recruitment services for American Express products.	In-Scope	TLM
Payroll	Supplier of services related to processing and issuance of paychecks and payroll deposits for American Express colleagues.	In-Scope	TLM
Prepaid Cards / Re-Sellers	Prepaid Card Resellers (e.g. Walmart, CVS, etc.)	In-Scope	TLM
Professional Services, including consulting and temporary staffing	Supplier of services involving strategic, operational, business, or other subject matter expertise, staff augmentation assistance, and/or corporate audit. [Note: professional services category does not include tax litigation consultants, tax legal counsel, and providers of audit services that are engaged and/or managed by the Board of Directors of American Express or by Finance, and government relations consultants that are engaged and/or managed by Government Affairs.]	In-Scope	TLM
Public Relations	Supplier of services involving the creation of public relations plans and communications to promote the company overall and/or the company's products, benefits and services (either new or existing) on traditional and social media channels.	In-Scope	TLM
Real Estate Leases and Flexible Workspace Providers	Real Estate Lease Providers supply long-term financial contracts to secure commercial office space for a tenant in a specific location, for an agreed upon term. Time frame of leases are typically 3-20 years, with large financial commitment attached via monthly rent and variable fees/expense. Flexible Workspace Providers provide access to flexible office space on a lease term of one month to three years. Spaces are typically shared with other tenants and all rent and fees are totaled into one monthly fee, allowing certainty around costs.	In-Scope	TLM





CATEGORIZATION OF THIRD PARTIES

1. In Scope Third-Party Categories

Category	Description / Examples	Policy Scope	Risk Requirements
Real Estate Management Services	Supplier of real estate services, including project management, transaction management, facilities management, and lease administration. [Note: this category does not include real estate leases or Flexible Workspace providers]	In-Scope	TLM
Sales	Supplier of services related to the sale of American Express products and/or services directly to customers, through any channel, e.g., Card Member acquisition conducted via phone, online, or in-person, Cross-Selling, Value Generation, Attrition Prevention, Save a Card Member.	In-Scope	TLM
Software	Supplier of software and related services, including cloud-based / hosting applications.	In-Scope	TLM
Sponsorship - Experiential	The creation, execution, or providing of promotions/offers as part of Entertainment or sport events that may be part of a sponsorship OR the sponsorship partner if they carry out these activities on behalf of Amex. These may include but not limited to providing benefits to Card Members, creating activations, validating Card Members at events, communicating marketing & advertising/offers to Card Members, or creating banners, digital media on behalf of Amex.	In-Scope	TLM
Sponsorship - Name Only	Amex sponsored events where extent of relationship is the inclusion of Amex branding.	In-Scope	TLM
Utilities	Standard non-negotiable utilities such as inbound cable television subscription agreements.	In-Scope	TLM
Travel Agencies	Third parties engaged by American express to provide necessary travel arrangements for customers such as transportation and lodging.	In-Scope	TLM

2. Alternate Practice Third-Party Categories

***Alternate Practice:** The oversight of specific third-party relationships which are managed outside the central Third-Party Lifecycle Management (TLM) program. The management of a Critical third party by an Alternate Practice must meet Critical third-party management expectations, i.e., joint testing, management plan, board reporting, executive owner, etc. An example of an Alternate Practice third party is Outside Counsel which is managed by the General Counsel’s Organization.

Category	Description / Examples	Policy Scope	Risk Requirements
Affiliate	Third parties engaged by American express to provide necessary travel arrangements for customers such as transportation and lodging.	Alternate Practice	Alternate Practice
ATM Partners	Amex Shared ATM Network Owners or Operators - banks and third parties contracted by American Express to provide ATM access for Cardmembers	Alternate Practice	Alternate Practice
Controlled Entity	A Controlled Entity as defined in AEMP37 Controlled Entity Governance Policy. <i>Note: Controlled Entities may maintain its own inventory and third-party risk management policy.</i>	Alternate Practice	Alternate Practice





CATEGORIZATION OF THIRD PARTIES

2. Alternate Practice Third-Party Categories

Category	Description / Examples	Policy Scope	Risk Requirements
Distribution Bank	Third party that acts as a distribution channel for American Express Card products. The third party introduces American Express products to its existing bank customers and may complete the card application. The decision to approve product, offer credit, manage account is controlled by American Express as per normal guidelines. American Express is solely responsible for all servicing activity. Some partners may perform partial Know Your Customer (KYC) certification. The Third party receives commission payments for introducing customers.	Alternate Practice	Alternate Practice
Financial Audit Services	i.e. PwC – managed by Finance instead of GSM. Related to the general audit of Amex and not inclusive of other professional service	Alternate Practice	Alternate Practice
GNS / Network Partnerships	Network Participant – an entity that is an issuer, acquirer, or both that operates on the American Express Global Network (AEGN)	Alternate Practice	Alternate Practice
Government Authorities & Statutory Services	Legally mandated services within a specific market or jurisdiction (e.g. health care, social services, government bureau or other arrangements with government authorities where AXP PAYBACK does not have a choice of alternate providers and the service is required)	Alternate Practice	Alternate Practice
International Card Currency Distribution / International Dollar Card	Third party that acts as a distribution channel for American Express Card products. The third party introduces American Express products to its existing bank customers and may complete the card application and also may subsequently act as an intermediary between AXP PAYBACK & CM for servicing requests including receiving AXP PAYBACK statements and making payments on behalf of CM. The decision to approve product, offer credit, manage account is otherwise controlled by Amex as BAU.	Alternate Practice	Alternate Practice
Investment Banker Engagements	Engagement of Investment banking firms to advise management and/or the board of directors in connection with M&A Activity within the scope of AEMP40 or in connection with strategic business planning.	Alternate Practice	Alternate Practice
Outside Counsel Law Firms	Law firms engaged by GCO	Alternate Practice	Alternate Practice
Tax litigation consultants, tax legal counsel	Tax consultants or legal counsel engaged by the Tax team	Alternate Practice	Alternate Practice
TLS Travel Preferred Suppliers	TLS fulfills travel benefits for our premium customers by partnering with preferred suppliers like Hotels, Airlines, Car rentals, Cruise lines, Concierge services, etc. TLS acts as an intermediary to book travel and travel suppliers transparently provides services to customer. Suppliers are Amex Merchants and typically pay a fee to participate in TLS programs. TLS has GCO managed supplier contractual agreement with these partners and typically makes a commission of the sale. TLS shares necessary customer data with supplier to fulfill the requested service.	Alternate Practice	Alternate Practice
Transactional Banking Services	Processing payments and collections for clients utilizing core banking clearing and settlement industry regulated infrastructure. (i) Banks regulated in jurisdictions AXP PAYBACK legal entities are located in (ii) Non-bank Financial Institutions (FIs) and FinTech companies licensed to provide payment and collection processing capabilities	Alternate Practice	Alternate Practice





CATEGORIZATION OF THIRD PARTIES

3. Out of Scope Categories

Category	Description / Examples	Policy Scope
Charitable Contributions	Payments to charitable entities	Out of Scope
Colleague T&E Spend on Corporate Card	Internal/Colleague T&E	Out of Scope
Customer (Consumer and Corporate)	Person or entity who utilizes AXP PAYBACK’s products and/or services. This does not include other relationships that American Express may have with such individuals or entities, such as third-party relationships.	Out of Scope
Government Regulators	Government oversight bodies (FRB, OCC, etc.) in their capacity overseeing AXP PAYBACK practices and compliance with regulatory requirements (not be willing to negotiate pricing or contractual terms, such as regulators performing reviews or audits, statutory services such as passport processing, and standard non-negotiable utilities such as inbound cable television subscription agreements).	Out of Scope
Insurance (Corporate Assets)	Insurance products AXP PAYBACK purchases to insure its own business and assets.	Out of Scope
Investments and Market Risk Management Activities	Institutions which accept client's funds as deposits, operating cash or other forms of investments. Entities, such as banks regulated in jurisdictions AXP PAYBACK legal entities are located in, with which AXP PAYBACK enters into financial transactions, e.g.: foreign exchange, interest rate, equity derivatives and reverse repos	Out of Scope
Membership Rewards (Pay with Points or Points Transfer Agreements)	Reward pay with points and points transfer (does not include Membership Rewards Merchandise Partners)	Out of Scope
Merchant Card Acceptance Agreements	American Express acquisition of a merchant used strictly for card acceptance	Out of Scope
Mergers and Acquisitions	As defined in AEMP40 – Merger & Acquisition Deal Approval Policy. Note: Third parties of Amex-acquired companies are in scope for this Policy and integration must be documented and approved	Out of Scope

