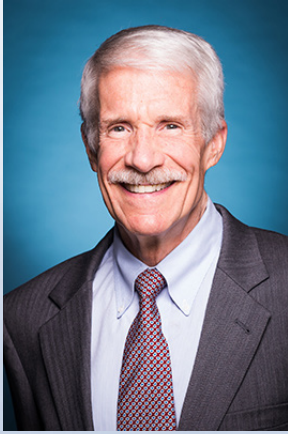




Standards of Business Conduct for Suppliers  
We do the right thing.



## A message from Paul



Paul Jones  
Senior Vice President, General Counsel &  
Chief Compliance Officer

### To Our Suppliers,

We want to build the greatest airline in the world. This requires a strong commitment to our customers, shareholders, business partners, and employees. 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.

American Airlines has created our Standards of Business Conduct for Suppliers to clarify our minimum expectations for workplace standards and ethical business practices that all our suppliers should be familiar with when doing business with American. These Standards reflect our corporate value system, which is based on integrity, honesty and the absolute dedication to act responsibly. American wants to do business with suppliers who share our value system.

Our goal is to work with suppliers to ensure compliance with these Standards. We realize, however, that many of you have your own mature compliance programs, including your own codes of ethics. These Standards only supplement, and are not meant to replace, your current code. In fact, if you're a supplier with your own code, you should continue to follow your code. We do request, however, that you review the Key Expectations to ensure your code covers the same key areas of concern underscored in these Standards.

If you don't already have your own code of ethics, we encourage you to seriously consider adopting a code suited to your business needs and the unique risks your company faces. In the meantime, please review these Standards carefully so that you will understand our ethical expectations for all of our suppliers. If you have questions, contact your business partner at American Airlines, the Business Ethics & Compliance Office at American, or your own company's compliance office or legal counsel.

Together, we'll both be successful by doing the right thing.

Paul Jones



# Key Expectations

## Safe and Respectful Workplaces

**Forced Labor**—Suppliers do not use forced or child labor and do not engage in slavery or the trafficking of persons.

**Discrimination**—Suppliers do not discriminate based on race, color, 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 do not subject employees to harsh or inhumane treatment including any corporal, physical, mental, sexual, or verbal harassment or abuse.

**Compensation and Working Hours**—Suppliers comply with applicable wage and benefits laws and regulations governing work hours and overtime.

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

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

## Ethical Workplaces

**Confidential Information**—Suppliers safeguard American Airlines' confidential information and refrain from using inside information to trade American Airlines securities.

**Books and Records**—Suppliers prepare and provide accurate information related to our business relationship and do not falsify or conceal records or requests for payment.

**Gifts**—Suppliers are aware of and follow American Airlines' gift and hospitality policies.

**Improper Payments**—Suppliers do not pay or offer bribes or kickbacks to American Airlines employees or to third parties on American's behalf.

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

## Environmental Awareness

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

**Environmental Compliance**—Suppliers ensure their operations comply with all laws related to environmental permits and reporting, air emissions, wastewater, and solid waste.

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## 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 expects our suppliers to share our commitment. While the Standards provide some detailed guidance, they cannot address every situation a supplier 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 or concerns 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 does not comply with the law or with the Standards, there can be serious consequences for both you and American, including reputational damage and substantial civil or criminal penalties. So you must fully comply with the Standards and all laws and regulations applicable to the operation of your business and your relationship with American.

### Ask questions and voice your concerns

If you have any questions or concerns 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 workforce employees and to safety

### Suppliers provide respectful workplaces

We expect our suppliers to provide a work environment that is free of all forms of unlawful harassment and discrimination.

Suppliers should uphold the human rights of their workers and treat them with dignity and respect. Suppliers should meet the following requirements:

**Laws and Regulations**—Suppliers comply with all applicable laws and regulations in the manufacture and distribution of products and supplies for us and when providing services to American Airlines.

**Forced Labor**—Suppliers do not use forced, bonded (including debt bondage), or indentured labor or involuntary prison labor and do not engage in slavery or the trafficking of persons. Upon request, Suppliers provide American Airlines access to copies of personal documentation (e.g., government-issued identification, passports, or work permits). Suppliers also must pay agency recruitment and/or employment fees and expenses in all instances.

**Child Labor**—Suppliers do not use child labor, as defined by local law or 15 years of age, whichever is greatest.

**Working Hours**—Suppliers comply with applicable laws and industry standards related to work hours and overtime.

**Wages & Benefits**—Suppliers comply with applicable wage and benefits laws and collective bargaining agreements.

**Abuse of Labor**—Suppliers comply with applicable 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 do not discriminate based on race, color, 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.

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

**Freedom of Association**—Suppliers comply with applicable laws on freedom of association and collective bargaining. The rights of workers to associate freely, seek representation, and join labor organizations or workers' councils are respected.

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

Call local law enforcement and/or call 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 workforce employees and to safety



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

Suppliers comply with applicable health and safety requirements and ensure that the following requirements are met:

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

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

**Emergency Preparedness**—Suppliers implement 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 or contractors do not engage in any work for American Airlines 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 American facilities or while conducting business for American.

## 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 American Airlines has 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 do not disclose to others American Airlines' confidential information. Remember that the responsibility for protecting confidential information may continue even after our business relationship ends.

### Suppliers respect American's intellectual property

American Airlines' intellectual property includes patents, trademarks, copyrights, and trade secrets. Suppliers may not use American's intellectual property except as authorized by written agreement with American. Any nonbusiness use, unauthorized use, or misuse of intellectual property can jeopardize its protection and value, and may also constitute theft.

### Suppliers do not 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 as a result of their work for American. Material nonpublic information is any information a company has not publicly disclosed that a reasonable investor would consider important in making a decision to evaluate, purchase, hold, or sell securities. Examples of material information include financial results or forecasts, adverse changes in liquidity, major new products or services, significant capital expenditures, 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 as completely and honestly as possible 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 provide it to American Airlines promptly. 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

American Airlines is committed to open and fair competition and conducting our business ethically and lawfully, regardless of geographic location, and 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 employee or to any third party on American's 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 conduct business in full compliance with 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 otherwise undermine the integrity of any competitive bidding process.

American Airlines does not participate in foreign boycotts that the U.S. government does not sanction and suppliers, while acting on American's behalf, must not do so either.

### Suppliers conform to formal bidding requirements

American Airlines seeks the most qualified suppliers through formal bidding processes. All qualified suppliers will be notified by American 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

American Airlines wants to make sure that 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 be aware of the gift and hospitality policies that American's employees follow so that they do not cause inadvertent violations.

American Airlines employees may not accept gifts of cash or cash equivalents (such as gift cards and gift certificates) 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.

American Airlines employees may give or receive a small token gift or memento to or from a current or potential business partner that is valued at \$100 or less as long as there is no actual or perceived undue influence involved. Any exceptions must be approved by American's Business Ethics & Compliance Office.



## Our commitment to fair competition

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

American Airlines employees and members of their immediate family are prohibited from accepting 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 American.



### Suppliers follow strict gift rules for government officials

Suppliers will not directly or indirectly offer or provide gifts or hospitality to any government official or employee (U.S. or non-U.S.) on behalf of American Airlines. Any exception must be approved in advance by American's Compliance Office.

### Suppliers comply with trade control laws and regulations

When a supplier's business with American includes international trade, suppliers comply with all applicable laws and regulations 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 American with required product specifications and pertinent documentation to ensure compliance with applicable export and import laws.

Suppliers implement practices and procedures to ensure the security of their supply chains in accordance with, and as applicable, the World Customs Organization's Authorized Economic Operator (AEO) standards, the Customs-Trade Partnership Against Terrorism (C-TPAT) initiative of the US Department of Homeland Security, and related global supply chain security programs in the countries where suppliers work with American Airlines.

## Our commitment to our business partners and others

### Suppliers respect the confidential information of others

American Airlines may have confidentiality obligations under the terms and conditions of contracts that American has with third parties and the information that they provide us. This includes keeping their software, source code, and other confidential information confidential from anyone not authorized to receive it. American treats the confidential information of these third parties with the degree of care required by our confidentiality obligations and with the same care American treats its own confidential information. While acting for or on American's behalf, suppliers must do the same. Failure to do so could put both American and the supplier at significant legal and financial risk.



### Suppliers respect the intellectual property of others

Under United States copyright laws, it is 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 authorized by the copyright owner when acting on American Airlines' behalf.

### Suppliers take privacy obligations seriously

American Airlines receives and maintains personal data about our customers and employees and takes measures to ensure that it is adequately protected. Personal data is defined as any information relating to a person that, either directly or indirectly, can be used to link to that person's identity.

If a supplier has access to American Airlines' personal data, the supplier must maintain its confidentiality, comply with American's customer-facing Privacy Policy and American's internal Privacy Policy for any proposed use of it, and adhere to any applicable laws that allow for securely maintaining it.

American Airlines encourages suppliers to protect the reasonable privacy expectations of personal information of everyone that they do business with, including their suppliers, customers, consumers, and employees, and to comply with privacy and information security laws and regulatory requirements if personal information is collected, stored, processed, transmitted, or shared.

### Suppliers deal fairly with the government

American Airlines' 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 do not submit false claims in connection with any government contracts, nor do we conceal, avoid, or decrease a legitimate obligation to pay the government. In addition, American requires suppliers to notify 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

American Airlines is committed to supplier diversity by providing small, minority, LGBT, and women-owned businesses the opportunity to compete for our contracts. American expects the same efforts from our suppliers when selecting and maintaining qualified suppliers. Suppliers will provide information to American about their use of diverse suppliers upon request.

### Suppliers safeguard the environment

American Airlines is committed to safeguarding the environment and promptly addressing any situation that results in the unauthorized discharge or emission of pollutants into the air, ground, or water and expects our suppliers to commit to protect the environment. In their operations, suppliers should minimize adverse (and potentially adverse) effects on the community, environment, and natural resources by following these requirements:

**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 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 required before discharge or disposal.

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

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

