

# Modern Slavery and Human Trafficking Statement 2022



This statement highlights the programmes and initiatives American Airlines, Inc. has undertaken to combat modern slavery and human trafficking during the financial year ending 31 December 2022.

## Our commitment

American is committed to respecting human rights, including combating illegal human trafficking and child exploitation. As a prominent member of the worldwide travel industry, we conduct our business with a focus on protecting human rights and the rights of children within our sphere of influence. We have adopted responsible workplace practices and endeavour to conduct our business operations free from complicity in human rights abuses.

## Our structure and operations

American is one of the largest airlines in the world, providing scheduled air transportation for passengers and cargo through our domestic hubs in Charlotte, Chicago, Dallas/Fort Worth, Los Angeles, Miami, New York, Philadelphia, Phoenix and Washington, D.C. and partner international gateways, including in London, Doha, Madrid, Seattle/Tacoma, Sydney and Tokyo. In 2022, over 199 million passengers boarded our flights. American is a founding member of the oneworld® alliance, which brings together a global network of 13 world-class member airlines and their affiliates, working together to provide a superior and seamless travel experience.

## Assessment of our modern slavery risk

At American, our purpose is to care for people on life's journey. Millions of people trust American to transport them safely to the moments that matter most. We fly over borders, walls, and stereotypes to connect people from different races, religions, nationalities, economic backgrounds, and sexual orientations. Unfortunately, making the world a smaller place can come with the risk of exploitation by human traffickers. The breadth of products and services American procures across its global supply chain may also expose the company to modern slavery risk.

American's assessment of its operational and supply chain risk falls within a broader enterprise-wide risk management framework. Modern slavery risk is first assessed without consideration given to the mitigation controls American has in place, producing an inherent risk level. In determining this inherent risk level, the company evaluates internal and external stakeholder data and source material.

The inherent risk is then considered with American's existing controls to produce an assessment of the current, or net, level of risk. The goal of this process is to allow senior management to understand if the company is appropriately controlling its risks and, if not, what additional measures the company should take.

American annually updates its risk assessment to identify potential modern slavery and human trafficking risk the company is likely to encounter such as entry into new markets, new regulations, and changes in the supply chain. Risk matrices are reviewed by the Chief Ethics & Compliance Officer, and any risk areas rated Serious or High are reviewed at least yearly with the Chief Legal Officer. Our most recent risk assessment, based largely on the controls we have implemented to mitigate human trafficking and modern slavery risk, resulted in an overall "low" rating for the company.





## Our programme

As a global airline, we recognise our unique role and responsibility to combat human trafficking and modern slavery. We embrace this responsibility by maintaining a comprehensive human trafficking prevention programme. American's programme comprises four essential elements: (1) policies addressing human trafficking; (2) training to identify and report suspected human trafficking; (3) internal accountability; and (4) external engagement and collaboration.

### POLICIES

Our commitment to human rights is outlined in our [Standards of Business Conduct](#), which require American's team members to uphold the human rights of all persons, including permanent and temporary team members both domestically and internationally. We do not knowingly conduct business with any individual or company that participates in the exploitation of children (including child labour), physical punishment, forced labour, or human trafficking.

For many years, we addressed expectations about our commitment to human rights in our Standards of Business Conduct for team members and suppliers. In 2020 we strengthened those expectations by adopting a [Human Rights Statement](#) that embodies our core values and commitment to respecting human rights in all aspects of our business and geographies where we operate. Our Human Rights Statement is formally aligned with global standards, such as the UN Guiding Principles on Business and Human Rights, and applies to all team members, contractors, suppliers, and other business partners when they are representing or acting for us.





As a U.S. federal government contractor, American is subject to the Trafficking Victims Protection Act of 2000 and implementing Federal Acquisition Regulation (FAR) 48 CFR 52.222-50 Combating Trafficking in Persons, which was enacted to combat all forms of human trafficking and forced labour. We have adopted a Policy Prohibiting Trafficking in Persons and Compliance Plan that serves as a guide to address and comply with these regulatory requirements.

We also flow down FAR 52.222-50 as required to our government subcontractors and agents. Any violations of the FAR or American's policy prohibiting trafficking in persons by team members, agents, or subcontractors may cause the agent's or subcontractor's removal from the contract, termination of the contract, reduction in a team member's benefits, or termination of employment.

American's policies and other information on human trafficking and modern slavery, including links to educational and training resources, are available to all team members on the company's intranet site.

## TRAINING

Through training, American team members learn how to recognise the signs of human trafficking and what action to take if they suspect human trafficking. We have mandatory human trafficking awareness training for our frontline, customer-facing team members, including flight attendants, pilots, and airport customer service representatives. This training is required for new employees and as part of our recurrent training programmes. We also provide training for team members with international purchasing responsibilities. All told, we train over 70,000 team members each year.

## INTERNAL ACCOUNTABILITY

American encourages the reporting of any incidents of suspected human trafficking or other activity inconsistent with our Standards of Business Conduct. American's business ethics helpline, EthicsPoint, is available 24/7 to all team members and business partners globally, and reporters can remain anonymous. They can call a toll-free number or use an online, secure web portal to ask questions or report questionable conduct.

American's Business Ethics & Compliance Office and Legal department also receive reports by telephone, mail, and email. We also inform team members they may report any activity inconsistent with U.S. government policy or American's policy by contacting The National Human Trafficking Hotline.

As possible, we will protect anyone suspected of being victims of or witnesses to prohibited activities. We will also cooperate fully with any trafficking-related audits and investigations by the U.S. federal government, including providing reasonable access to our facilities and staff.

American has a zero-tolerance policy against retaliation. Any team member who violates this policy will be subject to appropriate discipline, including reduction in benefits or termination of employment.





***“Human trafficking—whether in the form of forced labor, sex trafficking, or other offenses—is an abhorrent abuse of power and a profoundly immoral crime that strikes at the safety, health, and dignity of millions of people worldwide.”***

**- President Joseph R. Biden**

## EXTERNAL ENGAGEMENT AND COLLABORATION

Collaboration with government agencies, industry partners, and nongovernment organisations is a key facet of our human trafficking prevention programme.

In January 2018, American signed ECPAT-USA’s Tourism Child-Protection Code of Conduct. ECPAT-USA is the leading policy organisation in the United States seeking to end the commercial, sexual exploitation of children. The Code, which represents a joint venture between the tourism private sector and ECPAT, is a voluntary set of business principles travel and tour companies can implement to prevent child sex tourism and trafficking of children.

American is also proud to be involved with the U.S. Department of Homeland Security’s Blue Campaign, a national public awareness campaign designed to educate the public, law enforcement, and other industry partners to identify the indicators of human trafficking and how to appropriately respond to possible cases. In January, American spearheaded airport-wide training with DHS at Ronald Reagan Washington National Airport. Over 100 people participated in this session, including American team members, employees of other airlines, airport vendors, the Transportation Security Administration, and the Metropolitan Washington Airports Authority. Based on the success at Washington National, we expect to schedule additional training at other hubs.

Recognising our responsibilities as one of the largest employers in Texas, in 2019 we joined Texas Businesses Against Trafficking (TBAT), a business partnership established by the Office of the Texas Secretary of State to combat human trafficking by fostering collaboration between the public and private sectors. American was recognised for its commitment to combating human trafficking by the Texas Secretary of State at the inaugural TBAT forum in October 2019.



Other notable activities:

- In 2021, American joined the [United Nations Global Compact](#), the world's largest corporate sustainability initiative. As a signatory, we commit to align our strategies, policies, and operations with universal principles on human and labour rights, the environment, and anticorruption. Among the U.N. Global Compact principles, members pledge to uphold the elimination of all forms of forced and compulsory labour and the effective abolition of child labour.
- American participated in a Human Trafficking Roundtable hosted by U.S. Secretary of Homeland Security Alejandro Mayorkas to gain industry feedback on DHS' Blue Lightning Initiative and identify opportunities to improve the campaign, aimed at training aviation personnel to recognise potential human trafficking.
- American attended a Combating Human Trafficking in Aviation summit during National Human Trafficking Prevention Month hosted by the Blue Lightning Initiative to raise awareness of human trafficking in aviation, featuring subject matter expert presentations, partner representative panels, and a lived experience expert perspective on best practices to combat the crime.
- We have continued our close partnership with New Friends New Life (NFNL), a Texas-based organisation working to restore and empower formerly trafficked teenage girls and sexually exploited women and their children. In collaboration with three of our employee business resource groups – Professional Women in Aviation, Black Professional Network, and Latin Diversity Network – NFNL held human trafficking awareness sessions for over 100 American team members at our headquarters in Fort Worth, Texas, and another 120 team members at Miami International Airport. Our legal team also provided pro bono services to NFNL, such as helping the organisation's clients expunge criminal records from their time being trafficked. For its efforts, American was selected as a [2021 ProtectHER Award recipient](#) by NFNL.
- We marked World Day Against Trafficking in Persons on July 30, 2022, by sharing a message with 1.6 million followers on Twitter and LinkedIn.
- Ahead of Super Bowl LVII, American featured campaign content from the anti-trafficking organisation It's A Penalty, including a 30-second in-flight film.

## Vendor management and supply chain assurance

Our commitment to running a responsible airline also extends to our supply chain. We procure high-quality, cost-competitive goods and services from over 10,000 suppliers. The most significant elements of our supply chain include jet fuel, aircraft and aircraft parts, inflight food and beverages, technology, and office supplies.

Key criteria for doing business with American includes providing the best value in price and quality, understanding the airline industry, being financially stable, and certifying ethical business practices. These expectations are outlined in our Standards of Business Conduct for Suppliers and on a Supplier Management Portal. To ensure suppliers meet our standards, we include a Supplier Corporate Social Responsibility Assessment in our standard requests for proposal, which asks about their policies and practices around wage and labour standards, business ethics, the environment, health, and safety. This assessment helps us identify potential areas of risk, and where identified, flag suppliers for additional due diligence. We also monitor supplier performance against these criteria and assess potential risks, such as labour standards or workplace safety violations. In certain situations, particularly in geographic locations or product and service industries where modern slavery risk may be higher, our Procurement team will inspect a prospective supplier's facilities and operation to validate workplace practices.

American also encourages its suppliers to share our commitment to combat modern slavery. Through our [Standards of Business Conduct for Suppliers](#), we require suppliers to not use forced labour or child labour, and not engage in slavery or trafficking of persons. We also added a provision in our supplier contract templates requiring suppliers to comply with laws and regulations to prevent human trafficking and commercial sexual exploitation of children, including preventing the use of American's premises or products for such exploitation.

This statement was approved by the board of directors of American Airlines, Inc.

  
Stephen L. Johnson, Director

American Airlines, Inc.

June 2023

