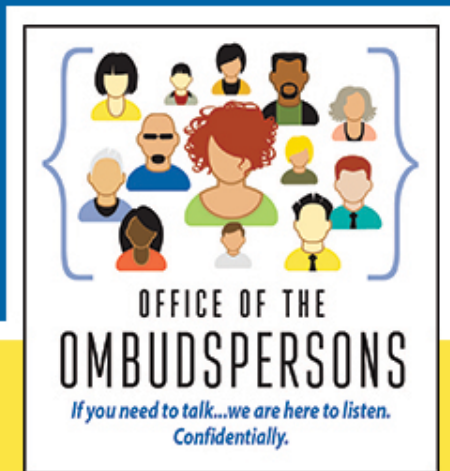


{ OFFICE OF THE OMBUDSPERSONS }



**A confidential resource for
Employees, Contractors and
Vendors**



Our Mission

Our Mission is to support the Code of Conduct and serve as an early warning system for the Company by providing employees, contractors and vendors with an independent, confidential, neutral and off-the record resource to discuss issues without fear of retribution.

Neutral. Independent. Off The Record. Confidential.

Role of the Ombudsperson

- A **neutral** resource available to all American Express people providing **confidential** and **off-the record** guidance to help surface and fairly address work-related issues.
- The Ombudsperson will listen, coach and assist in developing options within the Company to help direct issues to resolution. For example, an Ombudsperson can:
 - Provide coaching on how to approach your leader or other formal channels.
 - Help pass on information to your leader or other formal channel while you remain anonymous.
 - Identify alternative options after you have approached your leader or other formal channel and your issue has not been addressed.



Neutral. Independent. Off The Record. Confidential.

Types of Topics

- Knowledge of, or information about potential law or regulatory violations by American Express or its employees, vendors or agents acting on behalf of American Express
- American Express policies or practices that may vary from accepted standards for finance or business process controls
- Unsafe or unhealthy physical work environment on American Express premises

Types of Issues

Leadership - Supervisory Effectiveness

- Respect/Treatment
- Trust
- Favoritism

Leadership - Performance Management Processes

- Performance Improvement
- Annual and Mid-Year
- Goals and Metrics

Control & Compliance

- Code of Conduct/Conflict of Interest
- Business Practices
- Data Privacy and Security
- Employee Fraud

Change Management Processes

- Position Elimination
- Communication

Career Development

- Job Posting and Selection
- Career Progression

Confidentiality

- Conducts all conversations with inquirers and channels on a confidential basis.
- Does not use an inquirer's name or surface an individual issue without his or her permission.
- Has the Company's support as a confidential communication channel. **No-one has the right to know who has contacted the Office.**
- Abides by the International Ombudsman Association Code of Ethics.



Off-The-Record

- Is independent of the formal management structure of American Express. Reports to CEO's office.
- Does not maintain any documents or permanent records that would reveal the identity of someone who contacted the office.
- Does not make policy or management decisions nor conduct formal investigations.
- Is an alternative resource, complementing and not replacing the company's formal channels.







Neutrality

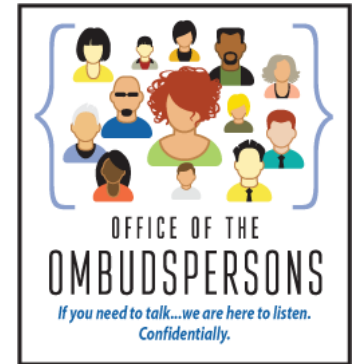
- Listens without passing judgment.
- Is impartial and does not take sides with either management or employees.
- Advocates for a fair process that is consistent with the Blue Box Values, Code of Conduct and the law.



Neutral. Independent. Off The Record. Confidential.

Contacting the Office of the Ombudspersons

 Confidential Toll-free	1-800-297-1010
 Direct Dial	1-212-267-1611
 Confidential Fax	1-212-267-1626
 External E-mail	amexombud@aol.com



Employees can find additional information under
“Departments” on The Square