



## **BUSINESS ETHICS and SAFETY COMPLIANCE**

### **Introduction**

The Company is committed to maintaining the highest standards of business ethics and complying with both the letter and the spirit of the law in everything that we do and in every country in which we do business. Doing so will also maintain the hard-earned respect that we have established over the years with our customers. Consequently, employees are prohibited from participating in or condoning illegal or unethical activity. Remember that illegal acts by employees can cost the Company millions of dollars in fines, and the penalties for corporations convicted of federal crimes are severe. And employees who violate the Company's ethical standards will be subject to disciplinary action up to and including termination.

To ensure compliance with this company policy, we have adopted these Standards of Business Conduct for all employees. These Standards apply to all officers and employees of American Airlines Group Inc. and its subsidiaries, except for the employees, officers, and members of the Board of Directors of US Airways Group, Inc. and its wholly owned subsidiaries, all of whom are governed by the US Airways Code of Business Conduct and Ethics. These Standards also apply to all agents, consultants, contractors, and others when they are representing or acting for the Company. We expect our vendors and suppliers to be guided by these principles

We have developed a Business Ethics, Safety & Compliance Program to educate you about the laws that affect our business and to provide the necessary channels to seek advice and report possible misconduct. The surest way to comply with the Standards of Business Conduct is to familiarize yourself with the following information:

<sup>1</sup> Any individuals who are subject to both the Standards of Business Conduct and the Code of Business Conduct and Ethics shall comply with both.

### **General Guidelines**

- Conduct all aspects of the company's business in an ethical and strictly legal manner. Obey the laws, rules, and regulations of all localities, states, territories, and nations where the Company does or seeks to do business. Remember that even the appearance of misconduct or impropriety can damage the Company's reputation.
- Be responsible for your actions. No one will be excused for misconduct just because it was directed or requested by someone else. Employees, who break the law, even if their intent is to benefit the Company, can be held criminally liable. They risk large fines, attorney's fees, possible jail sentences, and the loss of their jobs.

- Be responsible for the conduct of employees reporting to you. In today's environment, supervisors can be held responsible for condoning or negligently failing to take reasonable steps to prevent and detect criminal conduct by their employees. To avoid liability, supervisors must take all reasonable steps to ensure that their employees are familiar with the Standards of Business Conduct and do not participate in criminal activity.
- Conduct yourself with the highest standards of honesty, integrity, and fairness when dealing with customers, suppliers, competitors, the general public, and other employees. Do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice.
- Immediately report suspected illegal or unethical activity, including financial fraud/accounting matters. The Company does not tolerate retaliation against employees who act in good faith by reporting suspected illegal acts or unethical behavior, and retaliation against those who do can result in corrective action and possible termination.
- Cooperate fully in any investigation of misconduct.

If you have any questions about either the Standards of Business Conduct or the laws that might affect the Company's business, ask your supervisor, or contact the Business Ethics, Safety & Compliance Office or the Company's Legal Department. Any waiver of the Standards of Business Conduct for executive officers of the Company may be made only by the Board of Directors and must be promptly disclosed to shareholders on the Company's website. Remember, your best resource about what's right or wrong is your own conscience. So if you find yourself in a difficult situation, think before you act. And ask yourself the following questions:

- Is it legal?  
If it's not legal, don't do it.
- Is it ethical?  
If it feels wrong, it probably is wrong.
- How would it look in the newspaper?  
If you wouldn't feel comfortable if your friends and family knew about your actions, you probably shouldn't do it.

### **Chief Compliance Officer**

The Company's Senior Vice President & General Counsel is also our Chief Compliance Officer and is responsible for the Business Ethics, Safety & Compliance Program. You should direct any questions about the program, including the availability of educational materials and seminars, to the Business Ethics, Safety & Compliance Office by board mail (MD 5675 HDQ1), by calling (ICS or 817) 967-6923, or on-line at [aa.ethicspoint.com](http://aa.ethicspoint.com).

### **Reporting Illegal or Unethical Conduct**

You may safely report suspected illegal or unethical activity through any of the following means:

- To your immediate supervisor;
- To the EthicsPoint helpline (877) 422-3844, available 24 hours a day, seven days a week, for employees wishing to remain anonymous. Employees outside North America should see Jetnet or [aa.ethicspoint.com](http://aa.ethicspoint.com) for [international dialing instructions](#). Reports can also be made on-line at [aa.ethicspoint.com](http://aa.ethicspoint.com). On-line reports, which are made through a secure portal not by e-mail, can also be anonymous.

- To Corporate Security by board mail (MD 5555 HDQ1) or by calling (ICS or 817) 967-2142 (*for questions or concerns about theft and security violations*);
- To the Business Ethics, Safety & Compliance Office by board mail (MD 5675 HDQ), by calling (ICS or 817) 967-6923, or on-line at [aa.ethicspoint.com](http://aa.ethicspoint.com);
- To American Airlines, Employee Services, by board mail (MD 5137 HDQ) or by calling (800) 447-2000 -- Press "4" as soon as you hear the greeting to be transferred to a representative (for questions or concerns about harassment, discrimination, or hate-related behavior);
- To Envoy, Human Resources Department, by board mail (MD 5485 HDQ) or by calling your local Human Resources Representative -- contact information can be found on [Jetnet](http://Jetnet) (for questions or concerns about harassment or discrimination, or hate-related behavior); or
- To your local Human Resources Department for international employees from Europe and the Pacific.

### **Antitrust and Restraint of Trade**

Antitrust laws prohibit certain agreements or understandings between competitors about competitive matters. "Competitive matters" include prices and fares, output, terms or conditions of sale, customers or geographic areas served, schedules, yield management, inventory control, seating configurations, and marketing programs. If competitors take similar actions after communicating with each other, the government or private plaintiffs may try to claim that there was an agreement, even if no such agreement exists. To minimize the risk of such claims being brought, it is important that we always be clear that our actions are not being taken pursuant to an agreement with a competitor. Antitrust violations can be serious criminal matters, resulting in severe fines and jail terms. So if you have any doubt as to what constitutes a "competitive matter," contact the Legal Department.

The Company sells its services based on price and quality and purchases goods and services the same way. We do not prohibit our customers or suppliers from dealing with any of our competitors as a condition for obtaining any particular goods or services from us. Similarly, we do not force our customers or suppliers to buy unwanted goods or services from us as a condition to doing other business with us. Any proposed arrangement that might limit a customer's or supplier's ability to deal with a competitor must be approved in advance by the Legal Department.

#### **Key Points to Remember:**

- Never communicate or enter into an agreement or understanding, even informally or hypothetically, with a competitor about a "competitive matter." This includes oral, written, and electronic communications. Leave any meeting immediately if any "competitive matter" is discussed. In certain circumstances, discussions about joint fares and joint marketing of interline services are acceptable, but those discussions are limited to specific departments and must not begin without first consulting the Legal Department.
- Don't agree to a boycott of any business. Joint boycotts are usually illegal.
- Don't participate with other companies in joint negotiations or purchasing agreements for goods or services, unless approved in advance by the Legal Department.
- Don't enter into any tie-in arrangements that require customers to accept unwanted goods or services, unless the arrangement is approved in advance by the Legal Department.
- Don't enter into any reciprocity arrangements that condition the company's purchase of a supplier's goods or services upon the supplier's purchase of the company's goods or services, unless the arrangement is approved in advance by the Legal Department.

- Don't agree to exclusive-dealing arrangements that require purchasers of the company's services or products to deal only with the company.
- Don't require customers or suppliers to avoid dealing with any of the company's competitors as a condition for obtaining any particular goods or services from the company or doing business with the company, unless approved in advance by the Legal Department.

### **Bribes, Illegal Payments, and Illegal Solicitations**

Bribing foreign government officials to obtain or maintain business is a crime under the U.S. Foreign Corrupt Practices Act (FCPA) as well as under the laws of many countries in which the company does business. It is unlawful for the company or its employees to offer, corruptly pay, authorize, or promise to pay money or provide anything of value to a foreign official to obtain, retain, or direct business to that company. This includes payments made to foreign officials, political parties, political party officials, or candidates, or officers or employees of certain public international organizations. (Public international organizations covered by the FCPA include such diverse agencies as the International Bank for Reconstruction and Development, the Food and Agriculture Organization, the International Civil Aviation Organization, and the International Committee of the Red Cross. If you have questions about whether the FCPA applies to a particular international organization, please consult the Legal Department.)

U.S. federal laws and regulations also prohibit payments to federal agencies, federal officials, government contractors, and government subcontractors to improperly obtain favorable treatment or business. Federal laws also prohibit asking for or receiving proprietary information or selection information about the procurement of a government contract.

These laws can be difficult to interpret and apply, so any exception to the company policies set forth below must first be discussed with the Legal Department.

#### **Key Points to Remember:**

- Don't give or offer money or anything of value to a foreign official (including officials of state-owned enterprises such as foreign-government-owned airlines), political party, political party official, or candidate, or an officer or employee of certain public international organizations, to obtain, retain, or direct business to the company.
- Don't give or offer money or anything of value to any other person if you know or suspect it will be offered as a bribe to a foreign official, political party, political party official, or candidate, or an officer or employee of certain public international organizations to obtain, retain, or direct business to the company. Under this policy, "knowing" includes consciously avoiding the truth or ignoring clear "red flags" that the transaction is likely improper, such as unusual requests to segment a payment or pay a portion offshore to an agent or other third party.
- Don't give or offer any money, fee, commission, credit, gift, object of value, or compensation of any kind, directly or indirectly, to a U.S. or foreign government official, government contractor, or government subcontractor to improperly obtain a contract, business, or preferential treatment for the company.
- Don't seek or accept (directly or indirectly) from a government employee any proprietary information or selection information of a government agency during any federal procurement process.
- If you regularly deal with travel for foreign officials or employees of foreign governments, you should be familiar with the information contained in the [Policy and Procedures for Providing Discounted Travel or Other Gifts to Government Officials and Employees \(PDF\)](#).
- Promptly report to the Business Ethics, Safety & Compliance Office or the General Auditor any solicitation of improper payments, information, or benefits by foreign officials.

## **Political Contributions**

In the United States, direct or indirect use of corporate funds or resources to aid a candidate for a federal office violates federal law. Examples of improper contributions would be using company funds to purchase tickets to a political affair, paying employees to work at a political function, or cash contributions or the use of company assets or services (such as flight upgrades) for the benefit of a candidate or political party. State and local laws, as well as laws in other countries, also govern political contributions and activities. Company policy requires the approval of the Vice President-Government and Airport Affairs or Sr. Vice President-Government Affairs for any political contribution or the use of corporate funds or resources to aid any candidate or political party.

### **Key Points to Remember:**

- Don't make any political contributions (directly or indirectly) using company funds, property, time, or other resources.
- Don't include any expense that could be considered a political contribution in any expense statement or in any disbursement or request for disbursement of company funds.

## **Books, Records, and Communications**

Federal and state laws, including the FCPA, require us to keep complete and accurate books and records reflecting our transactions and financial affairs, including the disposition of assets. Also, various laws prohibit the Company from communicating false or misleading information about our transactions or financial affairs. For example, don't make any false or misleading statement in any FAA certification or in bids for government contracts. And mischaracterizing a payment (for example, expensing a payment to a government official or business associate as "meals" or "entertainment") is a violation of the FCPA.

### **Key Points to Remember:**

- Prepare all company business documents as completely, honestly, and accurately as possible.
- Record all company transactions in a way that will fully and accurately reflect the company's financial affairs.
- Properly and promptly record all disbursements and receipts of funds.
- Don't allocate costs to contracts contrary to applicable contract provisions, laws, regulations, or generally accepted accounting practices.
- Don't fail to record any transactions. Don't falsify records to conceal any transactions or prepare records that accurately reflect the existence of a transaction but fail to reveal an improper purpose.
- Don't provide false or misleading information to any third party, including the company's auditors.
- Don't provide false or misleading information to anyone within the company, or direct or permit an employee to provide such information. This includes misrepresenting any employee profile record (EPR) information with the intent to alter training requirements; intentionally miscoding delays; falsifying bag delivery times; failing to report baggage mishandlings; failing to create BMAS damage records for all damage claims covered under the Conditions of Contract; and falsifying any company records.
- Disclosures in reports and documents that the company files or submits to the SEC, as well as public communications made by the company, must be full, fair, accurate, timely, and understandable.

## Intellectual Property

Simply stated, infringing (i.e., the unauthorized use, misuse, or confusingly similar use of) another's intellectual property violates federal and state law. Intellectual property includes patents, trademarks, copyrights, and trade secrets. The company's intellectual property includes several very valuable trademarks. Many employees use the company's and others' intellectual property to conduct and promote the company's business. However, absent specific authorization to do so by the owner of the intellectual property, the company and its employees do not have the right to use another's intellectual property in any manner. Furthermore, misuse or unauthorized use of the company's intellectual property could jeopardize its protection and its value, and could constitute theft of company property.

It is a violation of U.S. copyright laws to share, make, or authorize the making of, a copy or adaptation of another's copyrighted material, including books, videos, CDs, MP3 files, and computer software (except that one copy of software purchased by the company may be made for back-up purposes) for purposes of commercial advantage or private gain. Unless the company has been specifically authorized to do so by the owner of the software, the company and its employees do not have the right to reproduce, in any manner whatsoever, third-party software.

In addition, many employees have access to highly confidential proprietary information. This information is known as trade secrets -- formulas, patterns, devices, or compilations of information that are used in one's business and that give one an opportunity to obtain an advantage over competitors who do not know or use them. When you joined the company, you agreed not to use for your personal benefit, or to disclose to others, company trade secrets or other confidential information. Your obligation is a permanent one that continues even after your employment with the company ends. Family members, friends, and, most importantly, future employers are among those with whom you cannot share company trade secrets and other confidential information.

Also, the company's contracts with customers or vendors may impose obligations of confidentiality for the terms and conditions of those contracts and for information the company may receive from those parties in the course of performing those contracts. This includes keeping software, source code, or other confidential information relating to company-owned or third-party software confidential from all persons not authorized to receive that information. If you have access to trade secrets, you have an obligation to keep them confidential pursuant to the terms of the company's contracts.

Employees who, without the consent of the intellectual property owner, use another's intellectual property in an unauthorized manner will be subject to discipline, which may include termination. In addition, individuals who violate the intellectual property laws may be subject to civil and criminal penalties, including fines and prison time.

### Key Points to Remember:

- Don't make copies of material copyrighted by a third party (such as books, videotapes or audiotapes, or computer software) for internal or external distribution or resale without obtaining the copyright owner's prior consent.
- Don't use, alter, or copy another's trademarks, including personal images (pictures), without obtaining the trademark owner's prior consent.
- Don't use the company's trademarks for non-company business without obtaining the company's prior consent.
- Don't alter the company's intellectual property without obtaining the company's prior consent.
- Don't reveal the company's confidential information or trade secrets (highly confidential proprietary information) to a third party unless the company has granted permission to the third party to receive that confidential information.

- If you receive what you believe to be another's trade secrets, do not use or share the information, but instead contact the Legal Department.

## **Inside Information and Investment in Securities**

Securities laws prohibit both the use of "material inside information" for your own personal benefit and the disclosure of this type of information to persons outside the company. These laws apply to company employees worldwide.

Material information is:

- Information about a company that, if disclosed, is likely to affect the market price of the company's securities.
- Information that would be considered important by an investor in deciding whether to buy or sell those securities.
- Information about the company, our competitors, customers, suppliers, or other companies.

Examples of material information include dividend increases or decreases, earnings estimates, new products or discoveries, major purchases from a supplier, merger or acquisition proposals, and other major events.

"Inside" information is information that has not been publicly disclosed. Information about a company should be considered "inside" information if it is received under circumstances that suggest it is not in general circulation. Information must not be considered "publicly disclosed" until a reasonable time after it has been made public (for example, by a press release). Someone with access to "inside" information may not "beat the market" by trading simultaneously with, or shortly after, the official release of material information. These laws apply to company employees worldwide. Insider trading is unethical and illegal, and will be dealt with decisively.

Key Points to Remember:

- Don't communicate "material inside information" to any person. This prohibition includes your spouse, domestic partner, any other relative or family member, any other domestic partner's relatives or family members, your broker, and other employees (except co-workers who need to know).
- If you receive "material inside information," don't trade in the stock of American Airlines Group Inc. (AAG) (if the information concerns the company) or the stock of any other company associated with the information. "Trade" means to buy or sell, direct someone else to buy or sell on your behalf, or otherwise engage in activities related to the purchase or sale of securities of the affected company.

Additional details concerning our insider trading policy, which all employees should read and must follow, can be found in the Our Policies section on Jetnet.

## **Environment and Safety**

Many laws have been enacted to safeguard the environment and to protect the health and safety of employees. The safety of our employees is as important as the safety of our passengers. Consequently, the company must comply with both the letter and the spirit of all laws intended to safeguard the environment and to protect the health and safety of employees. American Airlines employees should direct questions about environmental laws and the health and safety of employees to the [Safety, Security and Environmental \(SSE\) Department](#), and Envoy employees should direct questions to the [Safety Department](#). You should also use the many policies available on-line and your local environmental business plan for guidance.

### Key Points to Remember:

- An outstanding environmental and safety program requires your attention to detail, repetition, and incorporation of all actions required by our policies into your normal workplace procedures.
- You can contribute to keeping the workplace safe. If you are aware of a dangerous or hazardous condition, immediately report the situation to your supervisor, the AA SSE Department, the AE Safety Department, or the EthicsPoint helpline.
- As a manager, when an employee has an environmental, health, or safety concern regarding a situation that might pose an imminent danger, you must address the problem immediately. For less obvious environment, health, and safety concerns, you should: (1) listen carefully and ask questions; (2) investigate and visit the location if necessary; (3) use the available resources such as AA SSE Department and the SSE Policy Manual, experts in the Legal Department, and the AE Safety Department and the AE Safety Manual; (4) provide constructive feedback to the employee; and (5) if the concern is founded, fix the problem as soon as reasonably possible.

### Conflict of Interest

As an employee, you or any member of your immediate family should not engage in any activity that might benefit you or your family member personally at the company's expense, or that would be harmful to the company or contrary to the company's interests, without the express written consent of the company's General Auditor or, for an executive officer, the consent of the Board of Directors or a Board Committee.

Every employee owes the company a duty of loyalty, which includes protecting the company's legitimate interests, and advancing those interests when the opportunity arises; protecting the company's assets and ensuring their proper and efficient use; and using company assets only for legitimate business purposes.

While it is not practical to list all situations that are prohibited because they might lead to or constitute a conflict of interest or violation of trust, the following Key Points to Remember are good examples.

### Key Points to Remember:

- You, or any immediate member of your family, may not accept commissions, a share of profits or other payments, loans (other than with established banking or financial institutions at prevailing market rates), services, preferential treatment, excessive entertainment or travel, or gifts of more than nominal value, from any individual or organization doing or seeking to do business with the company.
- Never solicit any gift or entertainment or anything of value, or accept any gift or entertainment that would be illegal or result in any violation of law, from any individual or organization doing or seeking to do business with the company.
- Never accept any gift of cash or cash equivalent (such as gift certificates, loans, stock, or stock options), or accept anything as a "quid pro quo," or as part of an agreement to do anything in return for the gift, from any individual or organization doing or seeking to do business with the company.
- Never accept any gift or entertainment that violates your own department's more restrictive standards.
- Never participate in any activity that you know would cause the person giving the gift or entertainment to violate his or her own employer's standards.
- Never attend or participate in any entertainment that is unsavory, sexually oriented, or otherwise violates the company's commitment to mutual respect, as a guest of or host of any individual or organization doing or seeking to do business with the company.



- You, or any immediate member of your family (spouse, domestic partner, parents, children and their spouses, domestic partner's children and their spouses), may not have a business interest in any organization doing business with, or seeking to do business with, or competing or seeking to compete with, the company. (This does not include a non-material interest (less than 1%) in securities in widely held corporations that are quoted and sold on the open market.) Ownership of or an interest in a travel agency by you, or a family member who resides with you, is never permitted.
- You, or any immediate member of your family, may not, directly or indirectly buy, sell, or lease any kind of property, facilities, equipment, or services from or to the company through another company, firm, or individual.
- You may not use or release to a third party any proprietary or confidential information about the company, including information concerning company operations, practices, decisions, plans, or competitive bids.
- You, or any immediate member of your family, may not receive improper personal benefits (including loans to, or guarantees of obligations) as a result of your position in the company.
- You may not work for a company doing or seeking to do business with the company, or competing or seeking to compete with the company, if you are a management/specialist, individual contributor, function in a manager, supervisor, or team lead capacity, or are an officer or function in an officer capacity for American, Envoy, or any other AAG-affiliated company; or if you will be working in a management/specialist or officer/director capacity at the other company. This includes any company engaged in a phase of aeronautics, such as other air carriers and most of American's and Envoy's suppliers of aircraft, aircraft parts, and aircraft accessories.
- **Note:** If you work for another company or are self-employed, you must notify your manager in writing, and a copy of this letter must be placed in your Personnel file. If you are not an employee in Europe or the Pacific, you also must inform your immediate supervisor in writing if your immediate family member works for a travel agency or in a management/specialist or officer/director capacity for a competitor. A copy of this letter must be placed in your Personnel file.
- No outside activities, including outside employment, may interfere with your job performance for the company.
- A current or former employee may not solicit, directly or through a third party, current company employees to terminate their employment.

### **Gift Policy for Public Officials**

The vast majority of public officials are hardworking, dedicated people who often make personal sacrifices to serve what they believe is the public's best interest. Because of their public service, they often become familiar faces and household names like celebrities. It is natural, especially in a service business such as ours, to want to offer special treatment to celebrities or people who have done good things for the company or for the public in general. In most instances, such a reaction is appropriate.

However, public officials and those who deal with them must be very cautious to avoid the appearance that the public official's actions are influenced by any special treatment they receive from us. In fact, fears that public officials might trade on their official status for their own personal gain have resulted in the enactment of numerous laws, rules, and regulations dealing with when gifts and other benefits may be given to and accepted by public officials.

Under federal law and most state and local laws, it is illegal for the company or any of its employees to give a public official a gift or anything of value to influence or induce that public official to take action or refrain from taking an official act. It is also against the company's policy to attempt to influence official actions through gifts or other items of value. This would also include return or appreciation for an official act the public official has taken or may take on the company's behalf. Violations of the various federal, state, and local bribery and gift statutes may, in some instances, result in serious criminal sanctions, not to mention possible public embarrassment and damage to our reputation.

Accordingly, all employees must follow these policies when dealing with federal, state, or local public officials, who include:

- Members of Congress (Representatives and Senators).
- Executive Branch officials and employees, including officials of the office of the President and Vice President and members of the President's Cabinet and officials or employees of bureaus, offices, or regulatory agencies under a Cabinet member's jurisdiction, such as U.S. Embassies (Department of State), FAA, DOT, etc.
- State and local officials and employees such as state senators, county commissioners, and/or city councilmen.
- Staffers working for officials covered in the above bullet points.
- Family members of officials and staffers covered in the above bullet points. Family members include: spouse, domestic partner, children, parents, siblings, siblings-in-law, and dependent relatives.

Key Points to Remember:

- Never give a gift of cash to a public official.
- Never give, directly or indirectly, a gift, service, special treatment, or entertainment to any public official to influence or induce the public official to take or refrain from taking official action.
- Never give, directly or indirectly, a gift, service, special treatment, or entertainment to any public official in appreciation for official acts the public official has taken or may take on the company's behalf.
- You may give gifts, services, special treatment, or entertainment to a public official that would be provided to any customer in the same or similar circumstances. For example, you should treat a public official, who also happens to be a qualified Platinum member, like any other Platinum member. Do not treat a public official differently than any other similarly situated customer simply because he or she is a public official.
- Never give gifts, services, special treatment, or entertainment that would reasonably be considered to be lavish or excessive -- in terms of quantity or frequency. Gifts, services, special treatment, or entertainment must be of such a modest scale and nature that they don't compromise the integrity or reputation of the public official or the company. In making this determination, a good rule of thumb is to consider whether you would be comfortable if the giving of the gift, service, special treatment, or entertainment became a matter of public knowledge.
- Never aggressively offer gifts, services, special treatment, or entertainment to public officials. Keep in mind that in some instances public officials are prohibited from accepting even occasional meals or promotional sales items. If the public official declines the offer of a gift, service, special treatment, or entertainment, accept the decision without question and do not attempt to change his/her mind.

- Politely refuse any public official who demands inappropriate gifts, services, special treatment, or entertainment. If the public official continues to insist, contact the company's Government Affairs office at (ICS or 202) 496-5666.
- [If you regularly deal with public officials, you must familiarize yourself with and obey all laws relating to their activities \(PDF\).](#)

The application of the various federal, state, and local gift laws and rules as applied to airline benefits (many of which don't have a fair market value) can be confusing. So if you have any questions about how to apply this policy, contact Government Affairs at (ICS or 202) 496-5666, or the Business Ethics, Safety & Compliance Office at (ICS or 817) 967-6923.

## Data Privacy

The company takes its privacy obligations very seriously. The company receives and maintains a great deal of personal data (for example, name, address, e-mail address, etc.) about its customers and employees. If you have access to this information, you must keep it confidential, comply with the company's Privacy Policy on any proposed uses of the data, and comply with any applicable foreign or domestic laws on securely maintaining personal data. The company's Privacy Policy, including the date of its most recent update, is available through a link located on the bottom of every page of the company's web site at [www.aa.com](http://www.aa.com).

Key Points to Remember:

- Any marketing projects or other proposed uses of personal data must be reviewed for compliance with the Privacy Policy before implementation.
- No personal data should be provided to third parties unless (1) compelled by law or an appropriate subpoena; (2) expressly authorized by the respective employee or passenger; or (3) clearly permitted under a separate tenet of the Privacy Policy.
- Don't give personal data about customers or employees to law enforcement personnel or government officials unless the company is legally obligated to do so.

The Corporate Security Department can help answer any questions on how to handle requests for data. The Legal Department is also always available as a resource for privacy questions.

## Training Records

State and federal regulations require that the company provide certain training and maintain accurate and complete training records. Any failure to train or any discrepancy in these training records - accidental or otherwise - could violate these regulations and result in penalties against the company as well as against any individual who committed the violation. Failure to complete training required for you to do your job can result in your being withheld from work, without pay, until the training is completed. Continued failure to complete required training can result in disciplinary action, up to and including the termination of your employment. Falsification of training records can also result in the termination of your employment. The Employee Training policy can be found on Jetnet in the Our Policies section. Employees in Europe or the Pacific should check the European Employee Guide or their country-specific Human Resources Guide. Canadian employees can find the Training Policy in the Canadian Employee Policy Guide (CEPG) on Jetnet.

## **Unlawful Harassment**

The Company is committed to providing a work environment that is free of unlawful harassment (including sexual harassment) and discrimination. The company strictly forbids unlawful harassment or discrimination against any employee, vendor, customer, or other person that we do business with because of the person's race, age, gender, gender identity, sexual orientation, religion, national origin, disability, medical condition, or any other basis protected by federal, state, or local law or ordinance. The Work Environment policy can be found on Jetnet in Our Policies. For employees in Europe and the Pacific, the Corporate Culture policy can be found on Jetnet. Canadian employees can find the Work Environment policy in the Canadian Employee Policy Guide (CEPG) on Jetnet.

## **Hate-Related Conduct**

The Company is committed to providing a work environment that is free of hate-related behavior. Hate-related behavior is any action or statement that suggests hatred for or hostility against a person because of any one of the protected classes outlined in the company's Work Environment policy. Hate-related behavior will result in immediate termination of employment, regardless of length of service and prior employment record, even if it was intended as a joke.

Policies prohibiting unlawful harassment and discrimination and hate-related behavior can be found on Jetnet in Our Policies. Canadian employees can find these policies in the Canadian Employee Policy Guide (CEPG) on Jetnet. For employees in Europe and the Pacific, these policies can be found in the Corporate Culture policy on Jetnet.

## **Workplace Violence**

The Company's goal is to maintain a workplace free from acts or threats of violence and to effectively and promptly respond if acts or threats of violence do occur. Examples of prohibited workplace violence include:

- Physically or verbally threatening or intimidating another individual.
- Intentionally destroying or threatening to destroy the company's or another's property.
- Harassing or threatening phone calls or written communications.
- Stalking.
- Advocating illegal use of firearms, bombs, or weapons.
- Threats or attempts to commit suicide.

Employees must immediately report any violent or potentially violent conduct to their local management.

## **Rules of Conduct**

If you're an American Airlines employee, Our Policies on Jetnet contains policies and procedures that govern your conduct at work, including the Rules of Conduct. If you're an Envoy employee, Our Policies also contains policies and procedures that govern your conduct at work, including the Envoy Rules of Conduct. You should be familiar with these policies and procedures and follow them. Policies and procedures for non U.S. based employees are found in the respective policies and procedures relating to the country in which you are employed.

## **Business Ethics Training and Compliance Certification**

Key employees and those in sensitive positions must also attend Business Ethics Training and annually complete the Compliance Certification. You will be contacted if you are required to attend training and complete the annual Certification.

## **QUESTIONS/CONCERNS**

For questions or if you need clarification on the Attendance Control Policy please contact your supervisor or the Human Resources Department.