



**GLOBAL
BUSINESS
TRAVEL**

Environmental, Social, and Governance

ESG

2019 REPORT

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DON'T
do business
WITHOUT IT™



ABOUT THIS REPORT

WE SUPPORT



Our Company, American Express Global Business Travel (GBT), is proud of its responsible business efforts and progress, highlighted in this report for the benefit of our stakeholders. This report covers, unless otherwise specified, the period from January 1, 2019, to December 31, 2019, for all GBT group companies. GBT follows the Global Reporting Institute's (GRI) Standards for Sustainability Reporting, which helps companies evaluate and communicate the impact of their businesses in three focus areas of sustainability: environmental, social, and governance (ESG). The GRI content index appears on page 63; Communication on Progress with United Nations Global Compact appears on page 62; Supporting the United Nations Sustainable Development Goals appears on page 17. For more information, visit:

- United Nations Global Compact: www.unglobalcompact.org
- Global Reporting Institute: www.globalreporting.org
- For additional information about GBT: www.amexglobalbusinessstravel.com

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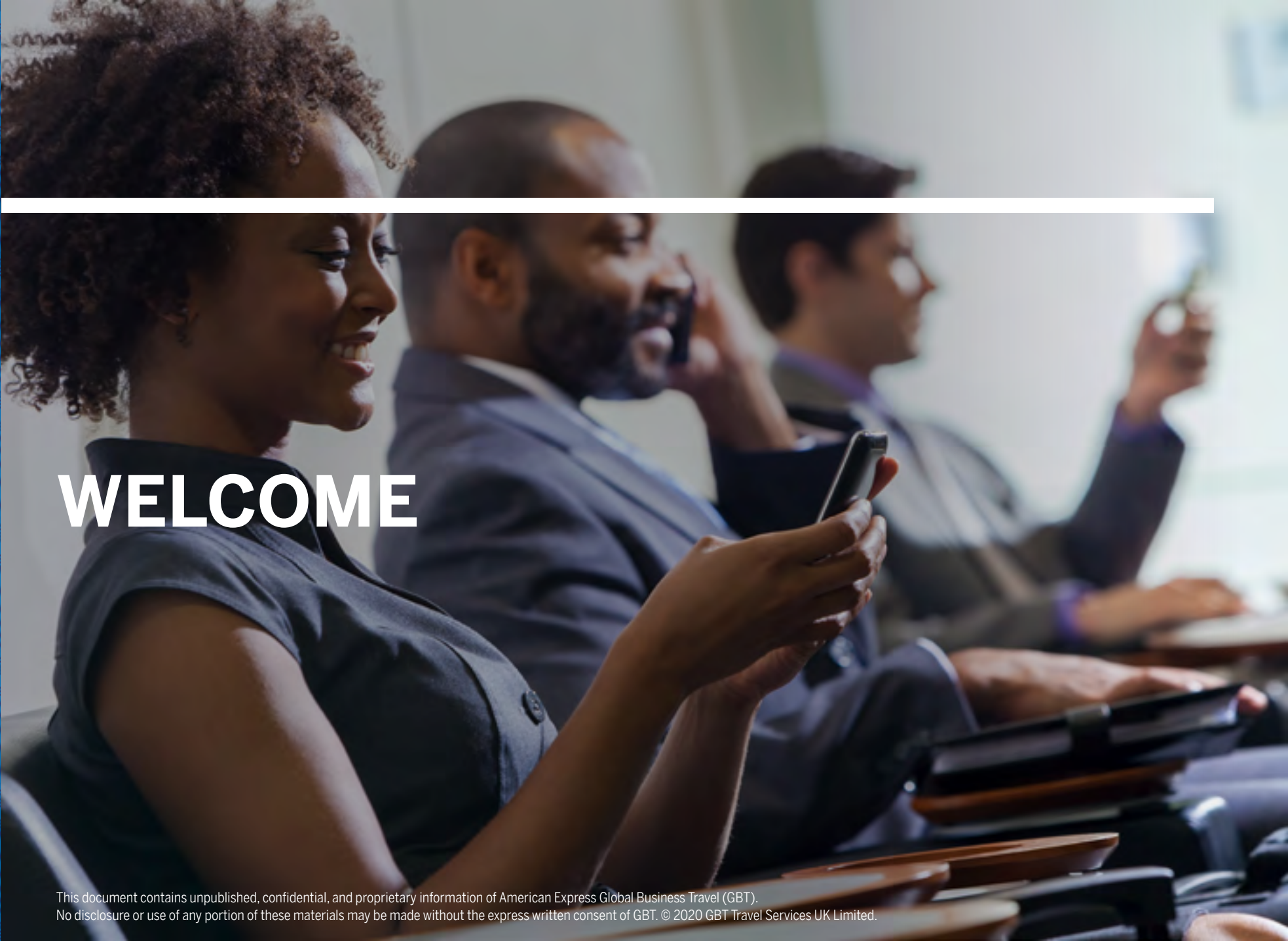
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WELCOME

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CEO Message



**PAUL ABBOTT,
CHIEF EXECUTIVE
OFFICER**

At American Express Global Business Travel (GBT), we believe in a 360° approach to corporate social responsibility (CSR) that earns the trust of our clients, employees, partners, and investors – and that supports the communities where we operate. This holistic approach interconnects environmental, social, and governance (ESG) factors.

What does ESG actually mean to us?

We have thought long and hard about this, as we continue to develop strategies that build on our previous commitments. It must inform our own practices and performance while supporting our client's objectives.

GBT champions travel as a force for good, connecting society and generating prosperity. We recognize the environmental responsibility that comes with being the world's leading business partner for managed travel and meetings. This means investing in the technology, innovation, and best practices to help clients achieve their sustainability goals while being present where they need to be. We

lead by example: investing in environmental schemes that mitigate greenhouse gas (GHG) emissions and conserve habitats, while directly benefiting local communities through charitable donations and volunteerism. Our global flagship cause is Education – Back to School in Times of Crisis. Through our partnership with UNICEF USA, in support of their global work, we are helping the world's most vulnerable children continue their education in the aftermath of disaster and strife.

We take our social commitments seriously. This is why GBT has built a workplace where diversity and inclusion are integral to our success. We look after our people and communities because we care.

We see governance, risk and compliance as foundational to the powerful backing of American Express, trusting that GBT will always do the right thing to protect its clients. I am pleased to share with you this annual report, which details how we continue to strive to build an industry-leading corporate social responsibility program.

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Our Values

Our Values - People, Passion, Progress - reflect what it means to be part of the GBT community:



We care for and respect each other, we show appreciation, and we have fun.

We're here for our travelers every step of the way.

We work hard and deliver on commitments so that our clients trust us.



We're energized and proud to work for American Express GBT.

We know that working together as one team is the only way to win.

Trust, integrity, and authenticity are at the heart of everything we do.



We invest for the long-term in our people, technology, and our communities.

We're innovators and lead our industry forward to solve current and future needs.

We're confident, quick to make decisions and see our actions through to deliver results.



People are the key to our success and our social commitment to promote diversity and inclusion. Passion and integrity compel us to operate our business in an environmentally responsible and sustainable manner. Progress requires governance, risk and compliance, oversight and rigor. GBT incorporates these core values into all aspects of its business, especially ESG.

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About GBT

GBT is the world's leading business partner for managed travel. We help companies and employees prosper by making sure travelers are present where and when it matters. We keep global business moving. Companies of all sizes and in all places rely on GBT to provide travel management services, organize meetings and events, and deliver business travel consulting. We believe progress is achieved through businesses' ability to connect - with colleagues, with clients, with partners. We are here to have your back and your travelers' backs wherever the road takes them.

GBT At-a-Glance¹

100+ years
OF SERVICE



40+ years
in Meeting
and Events

Presence in
more than
140 countries



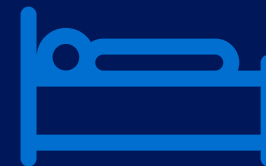
~ 18,000
employees

~8,000
travel
counselors



200 global
business
consultants

~ 40 million
hotel nights
booked¹



~ 10 million
travelers served
annually

¹ GBT Internal Reporting, FY 2019

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Our Brand

At American Express GBT we value our reputation and brand, built over 100 years.



GLOBAL BUSINESS TRAVEL



MEETINGS & EVENTS

BANKS ● SADLER

An American Express Global Business Travel Company



An American Express Global Business Travel Company



An American Express Global Business Travel Company



Division of American Express Global Business Travel

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Our Global Footprint

GLOBAL SCALE WITH LOCAL EXPERIENCE

Expanded presence in vital regions throughout the world provides local expertise at a global scale to provide the best value and service.

 GBT global footprint

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Our Products and Services



SUCCESSFUL BUSINESS TRAVEL PROGRAMS

Through close collaboration with our clients, we help define business travel goals and strategies and make sure they're carried out on a local, regional, and global level. We invest in breakthrough technology, negotiate savings to support decision-making, and hold ourselves to the highest of standards to keep data and travelers safe.



INFLUENTIAL MEETINGS AND EVENTS

Meetings are a part of life. Great meetings can make all the difference in the world. At GBT, we make meetings work for companies, their attendees, and their brands. Whether it's to inspire engagement, long-term loyalty, or create advocates, we design moments that matter and we have the right team, technology, and supplier connections to deliver them. Every meeting is an investment, and we help make the most of them based on our clients' goals.



TRAVEL CONSULTING SERVICES

When companies need guidance on business travel, we provide recommendations and hands-on execution. Our consultants help with everything from negotiating supplier terms to simplifying complex data so that our clients achieve full program potential.



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Awards and Recognition



Neo won first prize in the Best Valued Technological Innovation for Corporate Travel Management category at the Iberian Business Travel Association (IBTA) awards



Top Ranked: Travel Management Company on Travel Weekly's 2019 Power List



Best Places to Work for LGBTQ Equality - 2016, 2017, 2018, 2019, 2020 - GBT earned a 100% score on the Human Rights Campaign's Corporate Equality Index



GBT Products and Technology team received the 2019 Innovation Award in DevOps from CloudBees



Innovation award for GBT seamlessly integrating our end-to-end unified travel and expense platform, Neo



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Memberships and Sponsorships

As members and sponsors of the following groups, we help create new opportunities across the industry and enhance the ways in which our clients travel for business.



The Association of Corporate Travel Executives (ACTE) is a not-for-profit professional association of business travel stakeholders throughout the world. The ACTE purpose is to advance the interests of the corporate business travel industry, to promote industry networking opportunities, and to educate members on emerging issues.



The Global Travel & Tourism Partnership (GTTP) is an educational program with the mission to help educate the employees of the future. Its focus is on the travel and tourism industry, the world's fastest-growing industry, and on students in secondary and vocational schools.



The Global Business Travel Association (GBTA) is the world's premier business travel and meetings organization. GBTA connects the business travel world and promotes the value of business travel management. GBT was a gold sponsor and exhibitor at GBTA's 2019 annual convention. In addition, GBT provides leadership and sponsorship at annual and local events and partners with the foundation on travel-related research.



Parity.org's mission is to advocate for women's representation and bring gender parity to the highest levels of business – in the C-Suite and on the Board of Directors. It does this by promoting companies that demonstrate their commitment to gender parity, raising awareness about underlying issues, and providing facts and research that show the value in equal representation. GBT is a founding member.

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Memberships and Sponsorships



Women in Travel (WINiT) is a network of women and men serving as a catalyst to drive change, provide support, and educate the public about the benefits of career development, visibility, and promotion of women in the travel, meetings, and event management industries. GBT is a founding sponsor of WINiT, and our CEO, Paul Abbott, sits on the Advisory Board with additional employees holding positions on various Advisory Committees.



The World Travel & Tourism Council is a forum for the travel and tourism industry. It is made up of members from the global business community and works with governments to raise awareness about the travel and tourism industry.



The Women's Forum for the Economy and Society is a leading platform that highlights women's voices and perspectives on pressing global issues ranging from sustainable development and economy to culture and media. In 2019, GBT was a Silver Sponsor. At the Americas Women's Forum, our Chief Risk & Compliance Officer and Executive Chair of ESG, Si-Yeon Kim, along with Aeromexico's Chief Marketing Officer and the Secretary of Tourism for Mexico City, led a panel titled "Leading by Consumption: Making Travel Meaningful and Sustainable." At the Asia Women's Forum in Singapore, our Vice President of Risk, Compliance & ESG for Asia, Sasha Kalb, presented "Climate Consciousness: Make Climate Action Count." GBT also participated in a climate change summit in conjunction with the G20 meeting in Osaka and signed the G20 Charter for Engagement: Women Leading Climate Action, which was submitted to Prime Minister Abe.

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ENVIRONMENTAL, SOCIAL, AND GOVERNANCE AT GBT

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How We Engage Our Stakeholders

We have identified six stakeholder groups.

Engaging regularly with our core stakeholders helps us to identify ESG priorities that are most important to them and our business.

The table opposite summarizes the multiple ways in which we interacted with and engaged our key stakeholders in 2019.

Stakeholder Group	How We Interact	Relevant Issues and Topics in 2019	
Employees	Culture surveys, senior leadership business briefings, training (mandatory and optional), employee intranet, performance coaching program, GBT Ethics Helpline, community involvement projects, Pacesetters recognition event, employee discount programs, peer-to-peer reward and recognition tool, internal peer-to-peer survey tool	<ul style="list-style-type: none"> Compensation and benefits Health, wellness, and safety Training and education Code of Conduct Rewards and recognition Workplace flexibility 	<ul style="list-style-type: none"> Volunteerism Communications Diversity and inclusion Employee satisfaction Career development Culture and values
Clients and Travelers	Dedicated account teams, client satisfaction surveys, social media, site visits, marketing, website, account reviews, Request for Proposal (RFP) processes, industry trade shows and conferences, online/offline booking, mobile application, travel management products/services (duty of care, consulting, etc.), travel program reporting	<ul style="list-style-type: none"> Traveler duty of care Green travel and meetings Data privacy Crisis management Risk management 	<ul style="list-style-type: none"> Governance and ethics Client service Environmental concerns Traveler well-being Accessibility
Suppliers and Business Partners	Meetings/discussions, vetting and on-boarding, RFPs, Supplier Sustainability Shared Values, service level agreements, risk assessment processes	<ul style="list-style-type: none"> Responsible procurement Supplier diversity Governance and ethics Risk management 	<ul style="list-style-type: none"> Anti-Corruption Anti-Bribery Data privacy Code of Conduct
Investors and Board	Quarterly meetings, reporting, oversight, and engagement	<ul style="list-style-type: none"> Governance and ethics Risk management Anti-Bribery 	<ul style="list-style-type: none"> Anti-Corruption Data privacy Code of Conduct
Government and Regulators	Meeting and exceeding regulatory obligations both in letter and spirit	<ul style="list-style-type: none"> Employment Governance and ethics Risk management Anti-Bribery 	<ul style="list-style-type: none"> Anti-Corruption Data privacy Environmental concerns Code of Conduct
Community, Nonprofit, and Industry Organizations	Memberships in business and industry associations, charitable contributions, participation in volunteer activities	<ul style="list-style-type: none"> Volunteerism Philanthropy 	<ul style="list-style-type: none"> Responsible products and services Advocacy

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Materiality

This report focuses on the priorities defined by our business impact and key stakeholder feedback. We continually engage our key stakeholders to help us evolve our ESG strategy and tailor our reporting so that it aligns with their interests and needs.



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Supporting the UN Sustainable Development Goals

Launched in 2015, the United Nations' 17 Sustainable Development Goals (SDGs) collectively create an agenda to transform the world by overcoming barriers to economic, social, and environmental progress by 2030. As a global organization, our activities have the potential to connect and influence many of the SDGs. Of the 17 SDGs, we identified six in which we can make the most progress.



QUALITY EDUCATION: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.

Quality education provides an important foundation for sustainable development. When people are better informed, they can make better decisions for themselves, their families, and the communities around them.

- [Sustaining Communities Through Charitable Giving](#), page 55
- [Employee Learning and Development](#), page 38



REDUCED INEQUALITIES: Reduce inequality within and among countries.

- [Authentic Workplace](#), page 35
- [Diversity and Inclusion, and Equal Employment Opportunity](#), page 34



GENDER EQUALITY: Achieve gender equality and empower all women and girls.

- [Membership and Sponsorship](#), page 12
- [Diversity and Inclusion, and Equal Employment Opportunity](#), page 34
- [Authentic Workplace](#), page 35
- [Sustaining Communities Through Charitable Giving](#), page 55



CLIMATE ACTION: Take urgent action to combat climate change and its impacts.

- [Operating Sustainably](#), page 46
- [Our Decarbonization Journey](#), page 47
- [Managing Our Impact](#), page 51
- [Responsible and Sustainable Products, and Services](#), page 52



DECENT WORK AND ECONOMIC GROWTH:

Promote sustained, inclusive and sustainable economic growth; promote full and productive employment and decent work for all.

- [Employee Learning and Development](#), page 38
- [Employee Benefits](#), page 43



PEACE, JUSTICE, AND STRONG INSTITUTIONS:

Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.

- [Our Code of Conduct](#), page 24
- [Our Risk and Compliance Program](#), page 25
- [Respecting Human Rights](#), page 18

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Respecting Human Rights

We recognize our responsibility to respect human rights in all aspects of our business. Our conduct in our global operations is consistent with the spirit and intent of: the United Nations Global Compact and its ten principles covering human rights, labor, the environment, and anti-corruption; the United Nations Universal Declaration of Human Rights; the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, as applicable; the UK Modern Slavery Act 2015; the Voluntary Principles on Security and Human Rights; and other applicable international principles.

We focus on three key areas where human rights are critical to the way we operate:

- **Labor rights:** We respect the rights of our employees and suppliers by working in alignment with international conventions and guidelines.
- **Security:** We strive to keep our colleagues and facilities safe in accordance with local laws, customs, and cultures.
- **Supply chain:** We include expectations for contractors and suppliers concerning human rights within our Supplier Responsible Business Shared Values.



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Anti-Slavery and Human Trafficking

GBT has a zero-tolerance approach to modern slavery, reflected in our Modern Slavery statement published to the world. Human traffickers rely upon travel networks to operate, transporting victims on airplanes, bus and rail, and securing hotel rooms for exploitation. We recognize that the travel sector is uniquely positioned to stop this criminal activity and save lives. Our Company conducts due diligence and applies controls to prevent and detect human trafficking in our supply chain. Our Meetings and Events team has created an advocacy task force to educate colleagues on how to identify potential victims and take appropriate action. Our global Anti-Slavery Policy, which applies to all our employees and relevant business partners, compels our people to report any suspected activity immediately.

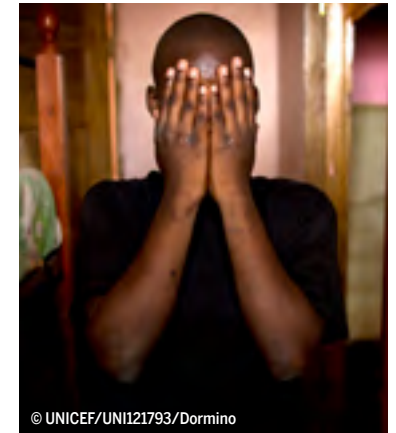
WORLD TRAVEL & TOURISM COUNCIL (WTTC) HUMAN TRAFFICKING TASK FORCE. We are a founding member of the first global industry-wide initiative to eradicate human trafficking and share best practices.

- **Prevention:** Increase industry and consumer awareness of human trafficking. It is proven that the more we know, the more we can do to prevent this crime.
- **Protection:** Train employees and travelers on how to identify and report suspected cases.
- **Action:** Encourage governments to enact and enforce legislation which recognizes human trafficking as a crime and to develop resources and support, such as national hotlines.
- **Support:** Provide assistance, employability training, and employment opportunities to survivors.

To learn more, visit <https://www.wttc.org/priorities/sustainable-growth/human-trafficking>

GBT AND UNICEF USA PARTNER TO IMPROVE THE LIVES OF CHILDREN. Through our partnership with UNICEF USA, we support its global educational programs to get children back to school in times of crisis. UNICEF works in over 190 countries and territories, especially those places vulnerable to armed conflict, natural disasters, and political unrest, which often lead to increased human trafficking. Not only does trafficking and child marriage prevent girls from going to school, but a lack of education can leave children at risk of child labor, early marriage, and exploitation.

EDUCATION AND TRAINING. We raise awareness among our employees through ongoing communications, training, and calls to action. For example, during the month of January, which is recognized as Slavery and Human Trafficking Prevention Month, we share resources with employees on how to identify potential indicators and victims of human trafficking - and how to safely contact law enforcement in the event of an emergency.



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Our Governance of ESG

In 2019, we solidified our ESG program with support and engagement throughout every level of the organization. We understand that strong governance is necessary to ensure that our priorities, roles and responsibilities are clearly defined. Our ESG program is structured with top-down oversight and bottom-up support to ensure that progress is appropriately tracked and managed.

The executive chair of our ESG program is Si-Yeon Kim, Chief Risk & Compliance Officer, reporting directly to the CEO and Board of Directors. Our Risk, Compliance & ESG team provides global leadership and strategy.

The ESG Steering Group is a governing body of department leaders and subject matter experts responsible for prioritizing and executing against goals. The ESG Program Team manages key projects and work-streams, including critical members from all functional areas of the business: Risk, Compliance & ESG; Internal and External Communications; Brand and Marketing; Human Resources; Global Supplier Relations; Business Consulting; Meetings and Events; Product and Technology; Real Estate and Facilities; Procurement; Commercial and Client Management.

Our Ambassadors are responsible for leading grass-roots efforts, creating and managing in-country projects and community involvement efforts, all while maintaining global consistency and coordination.



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Our Approach to ESG

We champion travel as a force for good, which binds society together and connects the world. We embrace our role in the global economy as an employer, service provider, and good corporate citizen. We prioritize our ESG efforts as follows:

GOVERNANCE, RISK AND COMPLIANCE

Doing the right thing is essential to our brand promise.

- Our strong governance framework protects our reputation, employees, and clients.
- Compliance truly is our competitive advantage as we are the most highly regulated travel company in the world.
- Our risk mitigation strategies address privacy, cyber-security, business continuity, crisis management – and combat fraud, terrorist financing, money laundering, bribery and corruption.



SOCIAL, DIVERSITY AND INCLUSION

Our global success depends upon a truly inclusive and diverse workforce that is reflective of, and responsive to, the needs of our diversified client portfolio. This is why we make long-term investments in our people and communities by celebrating diversity and inclusion.

- We ensure our workforce represents the cultural and racial diversity of the places in which we are located.
- We promote gender-parity to help our female colleagues equitably advance in their careers and to achieve gender-balanced leadership.
- We honor our LGBTQIA community by creating a safe working environment for people of all sexual orientations, and gender identities and expression.

ENVIRONMENT AND SUSTAINABILITY

We are committed to operating our business in the most sustainable manner possible with respect to the environment, our local and global communities.

- **Environment:** GBT is proud to be the first global travel management company that is carbon neutral with respect to employee business travel effective 2019.
- **Sustainability:** Through our flagship cause, Back to School in Times of Crisis, GBT helps children continue their education when learning is disrupted by natural disaster, conflict or catastrophe. We pledged half a million dollars to UNICEF USA in support of their global efforts to provide quality education to the world's most vulnerable children. GBT believes in the power of education to drive global prosperity in furtherance of the UN Sustainable Development Goals.
- **Leadership:** We innovate and collaborate with industry working groups, our clients and suppliers, to foster collective action and drive meaningful change on environmentalism and sustainability in travel, meetings, and events.

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A photograph of two men in a cafe setting, shaking hands. The man on the left is wearing a light-colored shirt and has a beard. The man on the right is wearing a dark patterned sweater. They are both smiling and looking at each other. In the background, there are coffee cups on a table. The image is overlaid with a white horizontal bar at the top and the title text in the center.

GOVERNANCE, RISK AND COMPLIANCE

At GBT, trust, integrity, and authenticity are at the heart of everything we do. We earn our clients' and travelers' trust with our sound governance and responsible business practices. GBT always adheres to the letter and spirit of the law.

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Our Corporate Governance Structure

GBT EXECUTIVE LEADERSHIP TEAM

Greg O'Hara, Chairman

Paul Abbott, Chief Executive Officer

Eric Bock, Chief Legal Officer, Corporate Secretary, and Global Head of Mergers and Acquisitions

Bill Brindle, Chief Operating Officer

Andrew Crawley, Chief Commercial Officer

Martine Gerow, Chief Financial Officer

Patricia Huska, Chief People Officer

Si-Yeon Kim, Chief Risk & Compliance Officer and Executive Chair of ESG

Evan Konwiser, Executive Vice President, Product and Strategy

Michael Qualantone, Executive Vice President, Global Supplier Relations

Boriana Tchobanova, Chief Transformation Officer

David Thompson, Chief Information Technology Officer

BOARD OF DIRECTORS

GBT has an 11-member Board of Directors chaired by travel industry veteran Greg O'Hara. The Board of Directors consists of representatives from American Express and Juweel Investors Limited. Our Board includes three Independent Directors.

BOARD COMMITTEES

- Audit and Finance Committee
- Compensation Committee
- Compliance Committee
- Mergers and Acquisitions Committee
- Risk Management Committee

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Our Code of Conduct



Our Company's success depends on ensuring that we hold ourselves to the highest ethical standards. The GBT Code of Conduct (Code) helps us to do this. It provides guiding principles to show our colleagues how to conduct business, examples to assist them in resolving potentially troublesome issues and contact information for seeking advice. The Code highlights GBT's commitment to its employees, shareholders, clients, and communities by focusing on: the treatment of employees and others; diversity and equal employment opportunities; protection of property and information; integrity in sales and advertising; and compliance with laws. The principles of the Code apply to everyone at GBT, regardless of job function, location, or seniority. Employees who fail to comply with the Code are subject to disciplinary actions in accordance with applicable laws and policies.

MAKING REPORTS

We are committed to an environment where open and honest communication is the expectation, not the exception. We want our stakeholders to feel comfortable in bringing forward issues or concerns, and escalating any potential violations of law or policy.

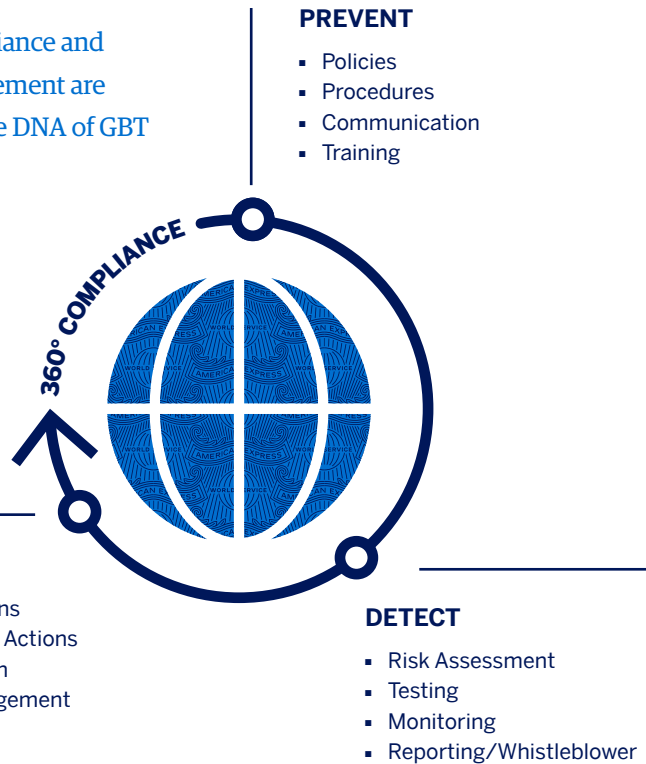
Our GBT Ethics Helpline is a confidential platform to report any concerns regarding unethical, illegal, unusual or suspicious activity. This helpline provides employees and business partners an opportunity to report issues and incidents without fear of retaliation and to seek assistance regarding ethical or compliance matters; health, safety, and security issues; policy violations; questionable conduct or other impropriety. Reporters can choose to provide the information on a confidential or anonymous basis. Once submitted, all concerns and questions are forwarded for review and investigation to specially trained individuals within GBT.

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Our Risk and Compliance Program

A TRUE 360° PROGRAM

How Compliance and Risk Management are built into the DNA of GBT



PREVENT

- Policies
- Procedures
- Communication
- Training

DETECT

- Risk Assessment
- Testing
- Monitoring
- Reporting/Whistleblower

RESPOND

- Investigations
- Disciplinary Actions
- Remediation
- Issue Management

As part of our brand promise, we must always do the right thing to protect our clients. We understand that the services we provide are scrutinized by governmental authorities due to regulatory risk. As a joint venture of American Express, we are the most highly regulated travel management and meetings and events company in the world. We are subject to the Bank Holding Company Act with ultimate oversight by the United States Federal Reserve Bank (Federal Reserve) and Office of the Comptroller of the Currency (OCC). We maintain a robust 360° Compliance Program as part of our overall risk mitigation plan and strategy designed to prevent, detect and respond. This ensures that the Company, its employees, and those acting on our behalf engage in the highest standards of ethical and transparent business practices and comply with all applicable laws.

Our Risk and Compliance Program is built upon a strong policy framework supported by communications and training, real-time monitoring, testing and reporting. Our Board approves key management policies which govern our overall Program, including

our Compliance Risk Assessment Policy, Compliance Monitoring and Testing Policy, Compliance Issue Management Policy, and Regulatory Compliance Training Policy. We continually enhance our Program to meet the evolving needs of our clients and strive to exceed industry standards. We conduct an annual Enterprise Risk Self-Assessment to identify and rate enterprise-wide risk at a strategic level for proper calibration and prioritization of resources.

The Risk and Compliance Program is tested through a “three lines of defense” approach. First, our business is tasked with validating the efficacy of internal controls through business self-testing. Second, our Risk and Compliance team conducts additional monitoring and testing. Third, our Internal Audit team applies another layer of rigor. All identified issues are addressed through remediation plans designed to prevent future occurrences. The Board receives quarterly reports of key risk indicators to proactively monitor and reasonably mitigate risk for the Company, our clients, and business partners.

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Risk and Compliance Training



Our Risk and Compliance team prepares an Annual Training Plan, which identifies the relevant audience and target courses, method of delivery and requisite deadlines. The Plan is approved by the Chief Risk & Compliance Officer and Executive Chair of ESG and presented to the Board on an annual basis as part of the GBT Annual Compliance Plan. We provide regulatory compliance training in the following areas: Code of Conduct; American Express Bank Awareness; Sanctions and Anti-Money Laundering; Anti-Bribery and Anti-Corruption; Privacy Awareness; Information Security; Anti-Trust; Unfair, Deceptive or Abusive Acts or Practices (UDAAP); and Telephone Consumer Protection Act (TCPA). These training modules are designed to promote awareness and understanding of the laws and regulations applicable to our products, services, and legal entities. All employees are required to take online training upon hire and annually thereafter. Completion rates are tracked and enforced. Additionally, GBT provides certain of the aforementioned training modules to specific third parties, including travel partners, vendors, and subcontractors, as appropriate.

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Risk and Compliance Policies

SANCTIONS AND ANTI-MONEY LAUNDERING

As a global company conducting business in every corner of the world, we must comply with all applicable sanctions laws and regulations, including those administered and enforced by: Australia Department of Foreign Affairs and Trade; Canada Office of the Superintendent of Financial Institutions; European Union Consolidated List; French Ministry for the Economy and Finance; Hong Kong Monetary Authority; Singapore Monetary Authority; United Nations Consolidated List; United Kingdom Her Majesty's Treasury; and the United States Department of Treasury's Office of Foreign Assets Control (OFAC). We take sanctions seriously because of the gravity of consequences in dealing with parties designated by governmental authorities for reasons of terrorism, the proliferation of weapons of mass destruction, human rights violations, narcotics trafficking, cybercrime, and other illicit activity. This is particularly important in the travel industry because terrorism threatens the safety of travelers and the public at large. This is why GBT conducts screening on millions of transactions - to prevent dealings with prohibited parties. Additionally, GBT adheres to all applicable anti-money laundering requirements, including the U.S. Bank Secrecy Act, the USA PATRIOT Act, guidance issued by the U.S. Department of Treasury Financial Crimes Enforcement Network (FinCEN), the Anti-Money Laundering Directives of the European Union, and the Wolfsberg Principles aiming to combat money laundering and counter-terrorist financing.

ANTI-BRIBERY AND ANTI-CORRUPTION

All forms of bribery and corruption result in increases to transaction costs and contribute to economic inequality, divert precious resources from intended parties, and erode democratic institutions and the rule of law. We fundamentally believe that bribery is harmful to our business, our clients, and the communities where we operate. For this reason, and because we respect the stringent laws established in many countries, GBT has adopted a zero-tolerance policy for bribery. To enforce this, our Risk and Compliance team actively works to prevent employees, partners, and vendors from engaging in any form of bribery or corruption, including offering, soliciting or accepting anything of value, directly or indirectly, that is given with the intent to obtain or retain an improper business advantage. We maintain a thorough anti-corruption compliance program, consisting of an Anti-Corruption Policy and related guidelines, procedures and controls designed to comply with all applicable laws, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, the Organization for Economic Cooperation and Development Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and the United Nations Convention Against Corruption.

FRAUD PREVENTION

Global complexity, the fluidity of bookings, and frequent last-minute changes make the travel industry inherently high-risk. To combat the threat of fraudulent activity and protect our clients, we have adopted a host of controls to mitigate risk, including machine learning and predictive analytics; identity verification procedures and technology; robotics routines highlighting potential red flags within booking processes; back-end reconciliation of client travel; extensive outreach and training to our traveler counselor population; screening of all booking transactions against sanctions and internal watchlists; direct reporting channels within industry associations, to government regulators and law enforcement; and adoption of Airlines Reporting Corporation (ARC) fraud prevention best practices. These controls are designed to protect our business and clients from the rapid increase and sophistication of criminals posing as purportedly legitimate travelers.

ANTITRUST

We strongly support vigorous and fair competition. We must all abide by laws designed to preserve free and open competition. These laws vary across the world, but their common goal is to promote a competitive marketplace that provides consumers with high-quality goods and services at fair prices. Our Antitrust Compliance Policy outlines requirements under the competition laws and regulations for dealings with competitors, clients, and suppliers. To strengthen our antitrust compliance efforts, employees receive quarterly reminders in the form of hypothetical scenarios. They must provide notice of intent to attend an industry event where competitors may be present and must comply with the processes in our policy relating to association memberships.



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Risk and Compliance Policies

INCIDENT MANAGEMENT AND BUSINESS CONTINUITY

We care for our clients and colleagues in challenging times. Our priorities are the health and safety of employees, supporting our clients, and managing any business impact. We take measures to prevent the impact of unexpected interruptions to business operations, with plans and procedures designed to help ensure consistent, predictable delivery of services to our clients. Our geographically assigned Incident Management Response teams are responsible for a coordinated response to crisis events that could materially impact our facilities, employees, clients, business applications, or other assets. The Incident Management Response teams, following appropriate policies, are empowered to issue a formal declaration that would trigger the implementation of the appropriate Incident Management Response Program Plan(s). We recognize the importance of minimizing the potential for business disruptions. For example, we follow a comprehensive pandemic preparedness plan that helps protect the health of the communities in which we work and live by monitoring and tracking developments, educating our colleagues, implementing programs to increase good hygiene practices and infectious disease control, and ongoing communications about conditions that may affect our businesses.

THIRD-PARTY OVERSIGHT

Our services require cooperation among an extensive network of third parties, including joint ventures, travel partners, and vendors. We choose our business partners wisely to achieve compliance with GBT standards. We operate a robust formal third-party oversight program designed to identify and mitigate the risks that arise in these relationships. Our third-party oversight program includes risk assessments, due diligence, and vetting; sanctions and reputational screening; contractual protections; oversight and monitoring; business continuity and preparedness planning; independent auditing; and additional controls for any third-party that accesses, stores or processes GBT data or that of our clients. When questions are raised concerning potential risk, we are quick to investigate, identify root causes, and take appropriate measures to implement corrective actions.

RESPONSIBLE MARKETING

Unfair, deceptive, or abusive commercial acts or practices can present significant regulatory and reputational risks. We comply with laws and regulations that require transparency, truthfulness, and fairness in marketing practices, laid out in the Unfair, Deceptive or Abusive Acts or Practices (UDAAP) Policy, and global requirements for marketing permission, laid out in the Digital Marketing Standard and enforced in review procedures for all public-facing materials.

PRODUCT DEVELOPMENT

Our Commercial Compliance team contributes to our end-to-end product development life-cycle, which embeds identification and mitigation of risk into our products, from concept to launch. The product development life-cycle incorporates best practices such as security architecture reviews and privacy impact assessments to help ensure privacy and security by design.



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Risk and Compliance Policies

DATA PRIVACY AND INFORMATION SECURITY

We honor and protect the personal information of the people we serve. We do this by maintaining a privacy program that ensures our use of personal information is transparent and giving the individuals that do business with us the power to control how their data is used in accordance with their legal rights. Our privacy program is built on EU principles that are a product of what is currently the most stringent and comprehensive privacy law framework in the world. Backed by a state-of-the-art information security program that adheres to U.S. Federal Financial Institutions Examination Council (FFIEC) guidelines, the NIST Cybersecurity Framework and is Payment Card Industry Data Security Standard (PCI DSS) compliant, GBT's privacy program is a demonstration of how GBT is willing to go the extra mile to protect client data. Our privacy and information security programs are ever developing to ensure that as new requirements and threats to privacy appear on the landscape, we are ready to respond. Both programs are subject to an accountability framework of testing, monitoring, and internal auditing.

TRAVEL IS INHERENTLY PERSONAL AND GLOBAL

GBT aims to provide cutting-edge technology without ever losing sight of the need for our travelers to understand how their information is used. Our comprehensive privacy statement is available publicly at: <https://privacy.amexgbt.com/statement>, along with our Data Protection and Privacy Principles. Our use of personal information is carefully assessed and managed and balanced against the right of the individual to privacy. As new technologies such as artificial intelligence are adopted, and new privacy challenges appear, the strength of our privacy and information security programs and our dedication to a culture of exceptional compliance offers our clients the benefit of a partner that they can trust to do the right thing, even when the law may not require it.

DATA PROTECTION IN PRACTICE

We understand that our clients want hard evidence that data is protected no matter where it goes. We are particularly proud of our Binding Corporate Rules. Our Data Protection and Privacy Principles have been approved by the EU data protection authorities and are internationally recognized. These rules apply to all our group companies to ensure that personal information is processed with the same high standards throughout the world. We are one of an elite list of companies that have managed to achieve the compliance levels necessary to be able to operate under this highly-regulated regime and so far, the only travel management company to obtain this accolade. This allows us to transfer personal information within our organizations in a compliant manner, as well as provide a solid framework for day-to-day processing.

PRIVACY RISK MANAGEMENT

Our comprehensive privacy program has the Data Protection and Privacy Principles at its core. Our global privacy team, led by our Chief Privacy Officer, is responsible for managing the privacy program. Results of our privacy risk management program are monitored by key personnel and regularly analyzed for potential gaps or trends that may require attention. We capture quarterly metrics that allow us to determine privacy compliance day-to-day. Results are reported to the Chief Risk & Compliance Officer and Executive Chair of ESG and shared with the Board. Our Internal Audit Team assesses the effectiveness of the program on a regular basis.



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Responsible Procurement

At GBT, we act with integrity in all that we do, including managing our environmental and social impacts to ensure a thriving and sustainable future. This commitment extends to our supply chain sourcing and procurement practices so that we choose the right business partners and suppliers that conduct business ethically and transparently. Our Supplier Responsible Business Shared Values provide an overview of the ethical standards that are important to GBT. All our suppliers and their employees must abide by these Shared Values in all business dealings for and on

behalf of our Company. Our suppliers are required to conduct business in accordance with all applicable laws, rules, and regulations, including, without limitation, laws related to confidentiality, competition, money laundering, anti-bribery, trade sanctions, and data protection laws. If Suppliers find themselves in a situation where customary conduct is at odds with these Shared Values, local laws or regulations, they are expected to comply with the more stringent standard.

SUPPORTING DIVERSE SUPPLIERS

We support the engagement of diverse suppliers on an equal basis with other suppliers. Our Global Procurement team works to identify opportunities to contract with diverse suppliers to satisfy business requirements. We define “diverse suppliers” as minority-owned; women-owned; historically underutilized businesses (HUB) zones; service-disabled, veteran-owned; lesbian, gay, bisexual, and transgender-owned; and small or other disadvantaged enterprises.

SUSTAINABLE PROCUREMENT

As a signatory to the United Nations Global Compact, we expect our suppliers to conduct business responsibly and we call upon them to incorporate the United National Sustainable Development Goals into their operations and other business relationships. Our suppliers are contractually obligated to comply with all applicable environmental laws and take measures to mitigate their environmental impact, including continuously improving their sustainable practices; improving their energy efficiency, decreasing their energy and water consumption and reducing GHG emissions; following the EU Directive banning single-use plastics and reducing the environmental consequences of plastics; promoting environmental responsibility and awareness; incorporating eco-conscious decisions into the development of their products and services; and including environmental considerations in investment decisions where appropriate.

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SOCIAL, DIVERSITY AND INCLUSION

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Investing in Our People



**PATRICIA HUSKA,
CHIEF PEOPLE OFFICER**

GBT is committed to Corporate Social Responsibility. It's ingrained in our corporate values - People, Passion, and Progress. Taking care of our people is deeply rooted in our culture and that's reflected in our HR priorities.

We are committed to creating a diverse workplace where every employee has the opportunity to express themselves and thrive. We are particularly proud of our commitment to Diversity and Inclusion. We are actively involved in championing the advancement of women in the workplace and ensuring that our LBGQTQIA employees feel that GBT is welcoming and inclusive.

We embrace each other for our differences and are eager to maintain an environment where all feel comfortable being their authentic selves. It's not only the right thing to do, but it's good for business and sets GBT apart from other TMCs.

The GBT team has over 18,000 colleagues around the world – each contributing to making this a great place to work, connecting both travelers and employees. We are proud of the service we provide our travelers and the impact we have in our communities.

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Equal Employment Opportunity

Our policy is to provide equal employment opportunities to all individuals based on job-related qualifications. That means we don't discriminate on the grounds of race, ethnicity, gender, gender expression, disability, religion, sexual orientation, marital status, citizenship, age, or any other legally protected characteristic or status in each of the countries in which we operate. In addition, subject to law, GBT will reasonably accommodate the known disabilities of employees. We also seek to maintain a non-discriminatory environment free from intimidation, harassment, or bias based upon these grounds. We strive to offer an inclusive workplace where employee differences are valued and utilized for individual, business, and organizational success.



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Diversity and Inclusion

We make a concerted effort to foster a diverse workforce. Employing people with various backgrounds, cultures, opinions, and talents enriches our Company and helps us to create and innovate so we can deliver on our commitments to our stakeholders. A diverse workforce better enables us to take care of our clients traveling around the world - we speak their languages, we know the places they are going, and we bring varied experiences to the table.

We have taken steps to improve our recruitment efforts, to ensure we reach as broad a population as possible so that our workforce can be reflective of the diversity around us. In 2019, GBT began working with Direct Employers, an association providing customizable recruitment outreach and partnerships with 140 diversity, disability, and veteran organizations. Our current workplace statistics are as follows.



United States*	2019	Women-Global Workforce	2019
Asian	7%	Executive Leadership Team	44%
Black or African American	10%	Vice Presidents	25%
Hispanic or Latino	10%	Directors and Managers	58%
White (Not Hispanic or Latino)	70%	Supervisors and Team Leaders	70%
Two or more races	2%	Individual Contributors	75%
Other	<1%	All GBT Employees	72%
Did not identify	<1%		

* Information not available for other countries.

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Authentic Workplace

We believe that providing a work environment based on respect, trust, and collaboration helps to create an exceptional employee experience, and enables employees to bring their whole selves to work and thrive in their careers.

To that end, in 2019, we relaunched two Employee Resource Groups (ERGs): LEAGUE and WOW. Open to all employees, ERGs are groups of like-minded minority employees and their allies, formed to act as a resource for members and the organization as a whole. The Company's support and endorsement of these groups are part of our ongoing effort to recognize the power and impact of its employees, all while advancing a respectful and caring community.



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Honoring our LGBTQIA Community

In 2019, we relaunched LGBTQIA Employees at GBT Unified in Equality (LEAGUE). This Employee Resource Group reaffirms our support for our LGBTQIA employees. LEAGUE provides a space to talk about challenges, obstacles, and achievements while also providing encouragement and support to LGBTQIA colleagues. One of the group's first initiatives was coordinating global PRIDE celebrations at offices in America and Europe.

For the fifth year in a row, we were awarded a perfect score on the Corporate Equality Index (CEI) from the Human Rights Campaign Foundation. The CEI measures the success of LGBTQ-inclusive policies, practices, and benefits in the workplace, so to continuously receive this recognition is a strong testament to the success of our program.



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Promoting Gender Balance

We ensure that the women who work for GBT are prepared to take on leadership opportunities and are pleased to share that as of December, 2019, 44% of our C-Suite and 25% of our Vice President leadership is female. We are committed to providing a diverse slate of candidates for all positions and seek to include at least two qualified women in the recruitment process for every open seat.

Cultivating Leadership

We promote the development of our female colleagues and provide them with the support needed to continue growing their careers. In early 2019, we partnered with an international talent management firm to conduct leadership assessments with 15 high potential women directors. The assessments focused on identifying leadership strengths and potential development opportunities. Participants then received detailed reporting outputs, and one-to-one coaching debrief sessions. Three of these directors have since been promoted to Vice President.



WOMEN OF THE WORLD (WOW)

In 2019, we launched WOW, an Employee Resource Group, professional and social network designed to cultivate and develop strong female leaders at GBT. WOW provides a supportive forum to exchange ideas, explore career paths, and unlock leadership potential. The program benefits employees by:

- Providing development opportunities to address individual needs;
- Expanding cross-functional networks and enhancing relationships; and
- Cultivating an environment that motivates people to work and grow together.



WOMEN IN TRAVEL (WINiT)

2019 was also a big year for the ongoing partnership between GBT and WINiT. More than thirty employees participated in the WINiT Mentorship Program. Employees from around the country attended the WINiT Summit in Chicago, where GBT Chief People Officer Patti Huska was featured on a panel about Change Leadership. Also, six GBT employees were nominated for awards at the inaugural WINiT Gala in November, with three winning in their respective categories.

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Employee Learning and Development

We are committed to creating a culture where our people can bring their best to work and find the learning, development, and support when they need it. Helping our colleagues reach their highest potential and love what they do is vital to us. Our learning and development programs - available on-demand and in multiple languages - help our colleagues build the capabilities needed to meet the demands of our business, foster an innovative, high-performance and client-centric culture, and prepare for the next stages of their careers.

In 2019, we significantly expanded the number of learning offerings available. We grew our course catalog to over 35,000 titles in 13 different languages, giving employees more control of their developmental paths than ever before.

ENTERPRISE LEARNING

We offer a variety of learning opportunities and resources to support an effective new hire onboarding experience, a culture of compliance, and the development of knowledge and skills around our values and competencies.

New Hire Onboarding

We believe in fostering genuine interactions, building relationships, and making employees feel engaged and empowered from the start of their new careers. Our onboarding program provides new employees with the necessary tools and resources to carry out their jobs and quickly become engaged, committed, and successful members of the GBT team.

Leadership Development

Available to current and aspiring people leaders, we offer learning programs aligned to the essential management practices that will help them meet the demands of our business and foster an innovative, high-performance, and client-centric culture.

TechAssist

In 2019, we launched TechAssist, a dedicated learning resource for technology training and communications. TechAssist helps colleagues in the deployment and adoption of day-to-day technologies, such as SharePoint, OneDrive, Soft Phones, Outlook, and others.

COMMERCIAL LEARNING

We provide a comprehensive learning curriculum dedicated to our client-facing teams that includes product and technology training, as well as tools to help them create the right strategies and solutions our clients need to meet their objectives.

MEETINGS & EVENTS

We offer a variety of leadership, management, and skills training, along with personal and professional development support dedicated to our meeting and events professionals to help them manage all aspects of our clients' meetings and events programs, as well as cultivate supplier relationships.

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Employee Learning and Development

TRAVELER CARE

In 2019 we introduced a new, online learning and development toolkit to help our Traveler Care colleagues get the tools, resources, and information they need for their specific roles. This simplified access point makes it easy for our colleagues to learn more about the behaviors, skills, and resources needed to be successful in their particular roles.

We also delivered a new, integrated Change Leadership Program to

over 130 Traveler Care leaders in 15 countries.

The program focused on how to motivate, engage and support our team coaches, team operations leaders, and travel counselors on new ways of working. Follow up coaching support was provided to embed new behaviors across teams, and practical “How to” guides presented on topics such as career development, performance conversations, building virtual teams, and building a continuous learning environment.

GLOBAL TUITION REIMBURSEMENT

We believe that educational opportunities have the potential to impact both employees and the Company positively. Our Global Tuition Reimbursement Policy provides tuition reimbursement to both full-time and part-time employees worldwide for degree-level qualifications at the undergraduate or postgraduate level.

PERFORMANCE COACHING

We empower our colleagues to take ownership of their performance and career journey by providing a system and resources that enable relevant, real-time feedback, and coaching that drives individual and team growth.

Our process includes:

- Informal and flexible performance cycle, driven by the employee
- Regular feedback and real-time check-ins each quarter
- Emphasis on improving future performance rather than evaluating past performance
- Dynamic goal-setting process, where goals and development plans are editable all year

In 2019, we increased the performance planning resources available to colleagues. Additions included a new, fully interactive course to help employees write SMART goals, as well

as a variety of ‘how to’ videos and the translations of resources into French, Spanish, and German.

CHANGE MANAGEMENT PROGRAM

In 2019, we provided change management training for our Directors and above. The curriculum, which was completed by 167 colleagues, included both online courses and live virtual sessions, with content provided by change management subject-matter experts. The training was followed up by monthly live virtual sessions on select topics to deepen the learning.

LOOKING AHEAD

In 2020, we will continue to develop our people and offer more personalized learning opportunities. We believe that our employees should never stop growing and we will support their development by providing enhanced learning opportunities.

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Employee Satisfaction and Engagement

In our continuous effort to understand the employee experience and better ensure we are cultivating the work environment we want, we regularly solicit feedback from our employees. In 2019, we announced six new key behaviors, and then conducted a Global Engagement Survey, asking 37 questions designed around those behaviors. Of our 18,000 employees, nearly 80% responded, exceeding even the benchmark set by high performing organizations. The responses provided valuable insight into the areas in which we are excelling, as well as the areas in which we would benefit from more focused attention. Based upon these results, we tasked our leaders to create specific action plans to address both the strengths and focus areas.



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Rewards and Recognition

Everyone at GBT works hard to deliver on the commitments we make to our clients. Our business does not take that for granted. Recognizing hard work is essential to exceptional employee experience. Colleagues want to know they're valued for their contributions, achievements, and efforts. When our colleagues feel appreciated, their satisfaction and productivity can rise.

We offer two programs to acknowledge our high performers and to express our gratitude to each other.

- Achievers** is a peer-to-peer platform where colleagues can express appreciation with "Shout-Outs" and points. Each month, all employees receive points to award their colleagues who have achieved results in line with our Company values. Employees can then use the points they receive from their colleagues to select a reward or make a charitable donation. We also use Achievers to recognize anniversaries. Employees can sign digital anniversary cards for their colleagues each year, and employees who achieve a milestone – for example, five or ten years of service – receive a special gift of points to spend in the Achievers catalog.
- Pacesetters** is an annual incentive trip for our top achievers, those colleagues who consistently deliver outstanding results while making GBT a great place to work. Each year, our Pacesetters are selected based on prior-year performance ratings and contributions.

Pacesetters: Prague

In 2019, we honored over 500 Pacesetters for their achievements in 2018, bringing them together with senior leaders and partners in June in Prague, Czech Republic. Each of the winners significantly contributed to our results and embodied our values. This year was especially significant as it included almost 100 new employees from our integration with recently acquired travel management company, HRG.

During the event, we announced several special award winners, most significantly, Pacesetters Legends. Our version of a lifetime achievement award, Pacesetters Legends, is reserved for those who deliver extraordinary results for GBT over many years and have been selected as a Pacesetter at least once before. This year five employees from four different countries were recognized.

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Flexible Workplace

In 2018, we launched our FlexWorx program to all employees. We are committed to creating exceptional employee experiences to motivate our employees to create prosperity in the communities we serve.

We see a shift in how today's talented workforce wants to get the job done. They want to be able to work in a way that allows for flexibility in work schedule and location, and they want to know their company supports them both personally and professionally. GBT is keeping pace with these changes through FlexWorx, a comprehensive set of policies that outline the flexible options available within GBT.

Many of our colleagues participate in flexible work options today, including working from home. But there are other ways to work flexibly. The FlexWorx program has four components:

- **FLEXTIME:** Employees may start and finish work at varied times, as long as they meet their goals and are available during core business hours.
- **FLEXWEEK:** Employees may make arrangements with their manager to work a weekly scheduled number of hours during a compressed working week.
- **FLEXJOB (Job Share):** Two employees share the duties and responsibilities of one full-time position on a daily or weekly basis.
- **FLEXWORX@HOME (Home Based):** Certain jobs may be performed full-time from a home office. In 2019, 42% of our total population, including 80% of our U.S. population, worked virtually.



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Employee Benefits

We are committed to providing our colleagues with a comprehensive benefits program that helps them achieve and maintain their best possible physical, emotional, and financial well-being. That's why we offer comprehensive and competitive health and work/life benefits as part of our total rewards package.

Our colleagues have access to a wide range of services and programs that can help them live a healthier lifestyle. Whether their goal is to effectively manage stress, lose weight, quit smoking, or address a more serious health care issue, we offer a broad range of services and programs that can help them along the way.

In the U.S., our health and wellness package includes:

- Medical, prescription drug, dental, vision, as well as flexible spending accounts and a health savings account
- Voluntary wellness programs, tools, and resources to help our colleagues and their eligible spouses/partners make informed health care decisions and live a healthier lifestyle
- 401(k) plan with company matching contributions
- Basic life insurance, supplemental life insurance, AD&D insurance, child life insurance, short-term disability insurance, long-term disability insurance
- Paid time off, sick days, vacation purchase plan
- Commuter Choice Program
- Tuition reimbursement
- Discount program on a variety of products and services, including weight management programs, gym memberships, and more.

Outside the U.S, our health and wellness benefits vary by country but typically include health insurance, disability insurance, retirement programs, employee assistance programs, wellness programs, and discounts.

GLOBAL EMPLOYEE ASSISTANCE PROGRAM

We provide employees and their household members access to free, confidential assistance with any work, life, personal, or family issue. Colleagues can contact the Employee Assistance service for live support. The range of assistance is varied and includes short-term professional counseling, in-the-moment telephone support, and information about local resources. The GBT Employee Assistance Program is a free and confidential service, staffed by professionals across the globe. It provides consultation and access to services, referrals, and resources to assist in balancing work and life, professional guidance, and support. It is available by phone 24 hours a day, seven days a week.

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Employee Benefits



SUPPORTING OUR COLLEAGUES WHO HAVE FAMILY RESPONSIBILITIES

GBT recognizes that providing job-protected paid leave for time away to care for a family member or bond with a new child is key to supporting our employees who have family responsibilities. There are several benefits we provide to our working families:

U.S. Salary Continuation for Birth Mothers – New mothers receive between 6 and 8 weeks of paid leave (or more if medically necessary) for absences related to childbirth and recovery from childbirth.

U.S. Paid Bonding Leave – Employees who have a new child in the family, whether due to birth, adoption or the placement of a child for foster care, are eligible for up to 12 weeks protected leave to bond with that new family member. In 2016, GBT adjusted this policy to ensure that all new parents receive the same amount of paid leave, regardless of whether the parent is father or mother or whether he or she is an adoptive or foster parent. GBT's Paid Bonding Leave policy provides these new parents full pay for 4 weeks.

Surrogacy and Adoption Assistance Policies – The Surrogacy and Adoption Assistance Policies each provide for the reimbursement of up to \$10,000 of an employee's costs related to a legal surrogacy or adoption and are available to regular full-time and part-time employees who have one year of continuous service. Each benefit is available one time a year for eligible employees.

Outside the U.S., there is a wide range of parental leave policies and programs available to our colleagues that vary country by country and are dependent upon local country regulations.

CATERING TO A VIRTUAL WORKFORCE

We provide our virtual workforce with online access to blogs and videos on a variety of health related topics. We host an internal wellness portal with monthly blogs on a variety of topics to build awareness and share ideas on our internal social platform. Topics included cancer prevention, healthy travel tips, UV protection, stress management, managing work-life balance, financial wellness information, and many more to help our employees take action on their wellness.

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ENVIRONMENT AND SUSTAINABILITY

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Operating Sustainably

When connecting people through travel around the world, we must protect the environment of that world. We are committed to operating our business in the most environmentally responsible way. This includes internal efforts to reduce our environmental footprint as well as external product and service offerings. We are effectuating change through our client relationships, partnerships with suppliers, and engagement with industry leaders, trade groups and associations. We are at a time where we can look, with purpose, to incorporate sustainability into the travel industry.



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Our Decarbonization Journey

Climate change and environmental sustainability are, quite rightly, high priorities for our customers and suppliers. As one of the world's leading travel management companies, we recognize our responsibility to help combat global climate change. In 2019, we witnessed new extremes: one of the hottest years on record; cyclones taking the lives of many across India and Bangladesh; temperatures in Paris surpassing 45°C for the first time; flooding so deep that the city of Venice was effectively shut down for days; and the devastating bushfires in Australia. According to the European Environment Agency, the transportation sector (inclusive of international aviation) accounts for nearly 25% of greenhouse gas emissions. The travel industry must face up to the reality of climate change and the need to improve air quality damaged by harmful transportation emissions. The complexity and severity of these issues require meaningful contributions from every individual and entity on this planet.

GBT is in a unique position to challenge and unite the travel industry to raise its game on sustainability. To create meaningful and lasting change, we must take responsibility and work together. We invite the entire travel ecosystem – our clients, suppliers, vendors, and business partners – to embark upon our decarbonization journey. The sum of our collective action is far greater than anything we can achieve on our own.

As GBT expands its global footprint through organic and inorganic growth, we seek to decouple growth from emissions. This is why we are formulating an ambitious carbon strategy and devising targets in accordance with science. While we assess future opportunities for internal reductions, we are taking immediate action with external offsets. Along our decarbonization journey, we will innovate, science will advance, and the travel industry will evolve. We are committed to setting targets, improving our analyses and measurements, and transparently sharing the same with our stakeholders.



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Our Decarbonization Journey

Our Carbon Footprint

Climate scientists classify GHG emissions into three basic “scopes” or categories. Our carbon footprint encompasses direct and indirect emissions that occur both upstream and downstream from our business. We have identified the areas within GBT that are responsible for the most significant emissions: Scope 2 purchased electricity and Scope 3 employee business travel. We are prioritizing our most significant carbon emissions sources because this approach will have the greatest impact on lowering our overall carbon footprint.

SCOPE 1 AND SCOPE 2

GBT has de minimis Scope 1 emissions (direct emissions from owned or controlled sources) as we do not own real estate or vehicles, all of our offices are leased and none conduct on-site fossil fuel combustion. Our Scope 2 emissions (indirect emissions from the consumption of purchased electricity) are sizeable due to the energy consumed by over 100 offices worldwide.



To help track our progress, we are partnering with Measurabl, the most widely adopted ESG software for real estate. This tool will facilitate data collection regarding our carbon budget to help us identify and mitigate ESG risks while capitalizing on value creation opportunities. Measurabl uses the 100-year Global Warming Potential values from the Intergovernmental Panel on Climate Change to calculate CO₂e and industry standard emissions factors across fuels and global regions, including lifecycle emissions from energy generation. Measurabl calculations are based upon the data provided at each site, accounting for utility consumption, transportation, and tenant utility consumption. When actual energy consumption data is not available, appropriate estimates are applied. With these analyses, GBT plans to purchase verifiable carbon offsets and pursue reduction opportunities, including energy conservation and efficiency measures, as well as renewable energy procurement.

SCOPE 3

Scope 3 emissions are all indirect emissions (not included in scope 2) that occur in our value chain, including both upstream and downstream emissions. Examples of Scope 3 emissions include: employee business travel, employee commuting, purchased goods and services, and waste generated in operations. GBT presently only measures employee business travel because remaining Scope 3 emissions are estimated to be de minimis. Additional Scope 3 categories may be considered in future analyses.

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Our Decarbonization Journey

GBT is carbon neutral for its own business travel effective 2019.

GBT is proud to be the first global travel management company that is carbon neutral with respect to employee business travel. Our award-winning offset project through Carbonfund.org has received triple gold distinction.

In 2019, we offset 100% of our emissions from our employee business travel – the only global travel management company to do so. These offsets support **Carbonfund.org Envira Amazonia Project**, an ecosystem services conservation project known as Reducing Emissions from Deforestation and Forest Degradation (REDD+). The Envira Amazonia Project is rigorously accredited and adheres to both Climate, Community & Biodiversity Standard (CCBS) and the Verified Carbon Standard (VCS). A recent audit performed by Scientific Certification Systems (SCS) noted two impressive accomplishments. First, the Envira Amazonia Project reduced more than 5 million tons of CO₂, from 2016 to 2018, which is the largest volume from a single project in Carbonfund.org's history. Second, the Envira Amazonia Project achieved Triple Gold Distinction for exceptional biodiversity, community, and climate change adaptation benefits. This is one of only a handful of projects in the entire world to accomplish this feat. This on-going Project has already: reduced deforestation by preventing the conversion of rainforest to large scale cattle ranching and mitigated associated GHG emissions; preserved biologically diverse habitats (particularly for rare and endemic bird species); engaged local community and stakeholders on critical issues such as property rights and patrolling; built a health center with an onsite pharmacy and dental chair; initiated work with an agronomist to teach agricultural extension courses and establish alternative economic activities.







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Our Decarbonization Journey

We voluntarily report our Scope 1, 2 and 3 emissions every year in our annual report.

Reporting Greenhouse Gas (GHG) Emissions

Type	SCOPE 1 AND 2					
	2019		2018		2017	
	Usage (MWh)	GHG Emissions (Tons)	Usage (MWh)	GHG Emissions (Tons)	Usage (MWh)	GHG Emissions (Tons)
Electricity	21,220	7,610	16,643	10,782	15,118	10,459

	SCOPE 3		
	2019	2018	2017
	20,594 tons CO ₂	12,668.7 tons CO ₂	11,341.9 tons CO ₂
	827 tons CO ₂	755.5 tons CO ₂	646.4 tons CO ₂
	40.1 tons CO ₂	43.8 tons CO ₂	48.7 tons CO ₂
	88.5 tons CO ₂	164.8 tons CO ₂	206.8 tons CO ₂
TOTAL	21,549.6 tons CO₂	13,632.8 tons CO₂	12,243.8 tons CO₂

Methodology: Our Scope 2 emissions account for 100% of our total Scope 1 (direct) and Scope 2 (indirect) emissions; calculations are based on World Resources Institute (WRI) World Business Council for Sustainable Development (WBCSD) Greenhouse Gas Protocol Scope 2 Guidance; for office facilities where actual energy consumption data is not available, energy consumption is extrapolated by multiplying each site's Gross Floor Area (GFA) by the Electricity Estimation Intensity factor (kWh/SqFt/yr) supplied by the U.S. Energy Information Administration's Commercial Buildings Energy Consumption Survey (CBECS); emissions calculations are provided by Measurabl. In 2019, energy consumption increased due to inclusion of recently acquired wholly-owned subsidiaries (DER, HRG, KDS, Banks Sadler) and emissions decreased due to more precise calculations via Measurabl.

Methodology: Our Scope 3 employee business travel emissions are calculated by Atmosfair; 2019 Atmosfair applied UK DEFRA emission conversion factors; 2018 and 2017 Atmosfair applied proprietary standards.

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Managing Our Impact

GLOBAL ENVIRONMENTAL COMMONS PROJECT

In 2019, we began an environmental impact assessment of all our sites through our Global Environmental Commons Project. The assessment focuses on tracking and managing key environmental indicators (e.g., energy efficiency with motion sensors and LED lighting, water savings via filtering systems, waste reduction with recycling), and implementing positive changes in all locations. As part of this initiative, we replaced single-use plastics, styrofoam, and wax-coated paper with reusable cups, glasses, and dishes in all major offices in several countries, including Australia, India, United Kingdom, United States, and more.

RESPONSIBLE INFORMATION TECHNOLOGY

Our commitment to environmental sustainability extends to our sourcing of sustainable products and services wherever feasible. One of our largest vendors in terms of procurement spend provides our desktop and laptop computers. When sourcing computers and related IT equipment, cost as well as energy-efficiency is taken into consideration.

GBT ensures that IT assets are ultimately disposed of securely and environmentally soundly. We utilize a reputable vendor to handle the recovery of electronic equipment according to strict environmental standards and data sanitization practices, including: Quality Management System (QMS) per ISO 9001 certifications; Environmental Management System per ISO 14001 Environmental; and Responsible Recycling Certification. R2 provides a standard set of processes and documentation requirements for businesses that repair and recycle used electronics, which are rigorously audited for quality, safety, and transparency, particularly with respect to data destruction practices.



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Responsible and Sustainable Products and Services

Our unique position in the center of the travel industry enables us to connect our clients and suppliers with opportunities to achieve their sustainability goals. This is why we offer a comprehensive suite of products and services that promote responsible business practices. Through collaboration with our clients and suppliers, we can collectively mitigate the environmental impacts associated with business travel, meetings and events.

- Green Consulting** – Our Global Business Consulting group provides a bespoke, results-oriented solution to help clients achieve their sustainability goals appropriate to their corporate culture. We apply a combination of market-leading analytics, policy bench-marking and adaptation, process optimization, communications management, and behavioral science to the sustainable travel challenge. Bringing these tools to bear, we help clients strike the right balance between spend control, traveler well-being, and environmental sustainability to achieve real and measurable results.
- Green Meetings & Events** – Our Meetings and Events team sources and plans sustainable meetings and events that incorporate eco-conscious decisions while giving back to local communities through charitable activities or donations. Our team works with clients to understand their goals, then designs and executes corporate event planning solutions to meet their needs. During the sourcing process, we can recommend locations and transportation strategies that minimize GHG emissions, and suppliers or convention centers that mitigate usage of energy, water, and waste. During the meeting planning process, we consult with our clients on additional measures to reduce environmental impact. This includes eliminating plastic water bottles, utilizing reusable and electronic signage, and providing event mobile applications to provide attendees with electronic meeting information rather than printed materials. We can also partner with the venue, food, and beverage service providers to design menus using locally-sourced and organic products.



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Responsible and Sustainable Products and Services

- **Carbon Offsets** – We can connect our clients with reputable carbon offset providers that follow the principles of Complementarity, Additionality, Verification, Registration, Traceability, and Guarantee, established by the U.N. Framework Convention on Climate Change. We are currently designing a global carbon offsetting solution that will be available to all interested clients in the near future.
- **Green Insights** – Our proprietary reporting tool contains filtering capabilities, a sustainability dashboard, and carbon calculations for clients to analyze emissions associated with travel.
- **Green Analytics** – We offer a host of solutions to analyze GHG emissions, including carbon emissions reporting, point-of-sale calculators, diagnostic analysis tools, and supplier scorecards to help businesses travel greener.
- **Green Bookings** – Neo, our own online booking tool, calculates carbon emissions for travel options using best-in-class methodologies and displays the resulting CO₂ “cost” alongside travel options. This capability enables customers to integrate environmental strategies into their travel programs while giving travelers the ability to make environmentally-informed decisions. Currently, Neo provides real-time carbon calculations for flights and train trips. In 2020, Neo will also feature green filters, preferencing, and prioritization functionalities. Such tools enable customers to influence end-users to select company-preferred options while allowing travelers to sort for the greenest trip. We help our clients meet their sustainability goals by providing travel managers, arrangers, and travelers the data and tools necessary to implement greener travel policies and environmentally-focused booking choices.

Refundable with Charge. [Change Fare/class](#)

 2,762 kg CO₂ – Issue by Mar 17, 2020

CEMAsys.com
sustainability management

Since 2008, our HRG Nordics operation has partnered with CEMAsys.com, a leading carbon offset provider of high-quality emissions credits to over thirty of our clients. In fact, HRG Nordics was the first travel agency in the Nordic region to offer emission credits as an integrated part of its business. To date, nearly 25,000 tons CO₂e from business travel have been offset with UN Certified Emission Reduction (CER) units that are issued from trustworthy climate-friendly projects called Clean Development Mechanism (CDM) projects. CDM projects take place in developing countries and contribute to their sustainable development. Each project goes through a strict and thorough vetting process.

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Responsible and Sustainable Products and Services



TRAVELER DUTY OF CARE

Globalization is driving the need for more business travel than ever before, but today's travelers have to endure growing complex disruptions. In fact, the number of travel disruptions continues to trend up year-over-year. Corporations are now responsible for monitoring their employees and their office locations around the globe 24/7. They also have an obligation to address the increasing and evolving duty of care needs across their organization, all while finding a way to communicate these disruptions to their employees as quickly as possible.

We are able to help our clients fulfill their duty of care needs with Expert Care™, our advanced, proprietary travel risk management solution that helps our clients locate and connect with travelers during a travel disruption. Travel risk intelligence is integrated into the platform enabling travel and security managers to prioritize potential impacts to travelers and assets, supporting crucial decision-making. Whether its business-as-usual or crisis management, GBT helps businesses keep travelers safe.

CUSTOMER SATISFACTION

Staying Connected With Our Clients

We have robust mechanisms in place to evaluate services provided to travel buyers and managers, as well as arrangers and travelers. Our global Customer Experience team leads the execution of our survey programs; results are shared throughout the organization and used to shape service strategies and evolve learning and development activities.

Through a combination of daily survey ratings and analysis of client comments, we stay connected with our clients and ensure we are consistently meeting their needs. Results from the 2019 customer survey program show that the strength of our service continues to be recognized by travelers and travel arrangers, with a 97% score for resolving client needs.

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Sustaining Communities through Charitable Giving

We have a long and proud history of giving back, whether through financial donations or volunteerism, and we are committed to maintaining this tradition of philanthropy. We encourage our colleagues to make a difference in the communities where we live, work, or do business. We are proud to support the people and organizations stepping up to make a positive and measurable impact on society.



FLAGSHIP CAUSE

We believe that education is the best investment in the prosperity of future generations. In 2019, and in keeping with our purpose – Travel, Connect, Prosper – we launched our new flagship cause, Education: Back to School in Times of Crisis. Through a multi-year partnership, we can support UNICEF USA's global efforts to provide safe and quality education for the world's most vulnerable children. We have pledged \$500,000 in financial support through 2021 to help UNICEF create and restore learning opportunities for children devastated by wars, humanitarian conflicts, or natural disasters.

UNICEF has helped save more children's lives than any other humanitarian organization by providing health care and immunization, clean water and sanitation, nutrition, emergency relief, and especially education. UNICEF USA consistently receives the highest ratings for accountability and transparency with a highly efficient expense ratio. We are very proud of our special partnership with UNICEF USA, the defender of children across the globe, for over 70 years.



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Sustaining Communities through Charitable Giving

WHY GBT CARES

With a presence in 140 countries and travel counselors available around the clock, we are always prepared to guide and assist our travelers through disruptions and emergencies that impact their journeys and lives. Once we ensure travelers are out of harm's way and help get them back on track, it's back to business as usual. However, that's not the case for millions of families. When crisis strikes, UNICEF rapidly responds to provide children with educational supplies and safe learning environments. Children are particularly vulnerable in crisis areas impacted by war or natural disaster with one in three children out of school. Quality education is especially important for children living in places affected by protracted conflict or complex humanitarian emergencies as it provides them with stability and structure as well as the knowledge and skills necessary to rebuild their communities. School is not only a place to learn, but also a safe space for children to play and access physical and mental health services. Every child has the fundamental right to education yet 262 million children and adolescents are out of school worldwide. In 2020, more than 1.5 billion students and youth were affected by school closures due to the COVID-19 outbreak. In 2018, UNICEF responded to 285 humanitarian situations and reached 6.5 million children suffering during emergencies with basic education services. Together, we can help children thrive to reach their full potential.



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Sustaining Communities through Charitable Giving

UNICEF FUNDRAISING CAMPAIGNS

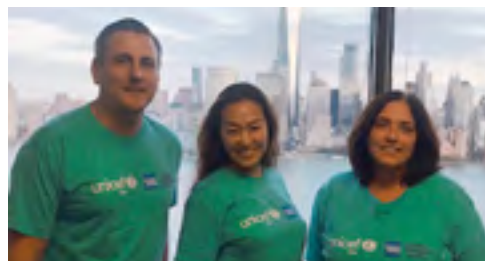
Throughout 2019, we donated more than \$200,000 to UNICEF through corporate giving and fundraising activities around the globe:

- In August 2019, we kicked off our partnership with UNICEF USA at the Global Business Travel Association's (GBTA) global conference. As part of our total corporate donation commitment, we unlocked \$210 for every five client meetings scheduled with our sales team. With \$210, UNICEF can provide a School-In-A-Box to help children continue their education during times of emergency. Each kit is a large aluminum suitcase that doubles as a blackboard when coated with special paint and contains school supplies and materials for up to 40 students. The box also includes an inflatable globe, a teaching clock, wooden cubes for counting, a wind-up/solar radio, and laminated posters of the alphabet and multiplication tables. The School-in-a-Box contents are culturally neutral, available in all needed languages, and can be distributed in every corner of the world. With support from the funds we unlocked, UNICEF could provide 50 School-in-a-Box kits.
- From November 20, 2019 (Universal Children's Day) through December 3, 2019 (Giving Tuesday), our colleagues around the globe raised over \$55,000 during our first annual fundraising drive. Employees showed support by wearing blue, the official color of both GBT and UNICEF, and shared pictures through social media with the hashtags [#GBTcares](#) and [#WorldChildrensDay](#). Our employees, and especially our Ambassadors, united around this initiative with unprecedented generosity and enthusiasm.
- At the end of 2019, when bushfires swept across Australia, we created a targeted campaign for UNICEF Australia to support emergency responders and help children return to school. Our Company and its employees raised and donated over \$25,000.
- In November 2019, employees Annick Olimon from Mexico, Chris Stanley from the United States, and Matthew Pancaldi from the United Kingdom ran in the New York City Marathon, raising over \$18,000 for UNICEF USA.



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Sustaining Communities through Charitable Giving



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Sustaining Communities through Charitable Giving

DISTANCE LEARNING IN TIMES OF CRISIS

GBT understands that complicated problems require creative solutions, which is why we partner with UNICEF USA to protect education in times of crisis.

For example, from 2017-2019, more than 9,200 schools across West and Central Africa were forced to close due to increased violence. Fourteen year old Hussaini (pictured below) is one of the more than 1.9 million children who faced a much higher risk of recruitment by armed groups, gender-based violence, and targeting by traffickers. UNICEF worked to get children back to school with a “Radio Education in Emergencies” program, ensuring that teachers could broadcast lessons to students who want to learn. Thanks to a radio set Hussaini received, he can continue his learning through radio lessons in literacy and numeracy.

In 2020, in response to the COVID-19 global pandemic, UNICEF is supporting ministries of education in providing a variety of distance learning solutions.

According to UNICEF's report, “A Future Stolen,” “In countries affected by war or natural disaster, one in three children and young people are out of school.” Children, in particular, are vulnerable during times of crisis. Emergencies represent a heightened risk to the physical and emotional security of children and may have social, psychological, and economic ripple effects, particularly when these crises interfere with schooling. Being in school can keep children safe and protected from risks such as gender-based violence, trafficking, child labor, and early marriage.

That's why the work UNICEF is doing to rapidly get children back into a classroom setting after these kinds of disasters occur is critical. Not only can it help to restore their sense of security and normalcy, but it also can help shield them from the chaos around them in the aftermath of the catastrophe.

“Our American Express GBT team is particularly great at shining in a crisis — from the care we provide our travelers to get them home safely during natural disasters or other disruptions to the support we give to our fellow team members and communities when they need it most. As the world's leading partner in managed travel, we are honored to support UNICEF and the outstanding work it does around the world to educate children in times of crisis.”

Si-Yeon Kim, Chief Risk & Compliance Officer and Executive Chair of ESG



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Sustaining Communities through Charitable Giving

PACESETTERS VOLUNTEERS

Our Pacesetters have a long tradition of giving back in every country they visit. In May 2019, our Pacesetters visited the Centra dětí a mládeže (Teen Challenge Center for Children and Youth) in Prague to help with needed renovations, including painting rooms, building planters and climbing equipment, and landscaping the play spaces – all for the children to enjoy. The Pacesetters unveiled their handiwork to the children who arrived at the Center later in the day. In addition, our Pacesetters brought school supply donations to the Center to promote education.

The Centra dětí a mládeže is part of the international Teen Challenge network of aid organizations. Since 2001, they have been helping children and young people with behavioral and mental health issues and in need. Around 30-40 children attend the site daily.



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APPENDICES

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UN Global Compact: Communication on Progress

The United Nations Global Compact (UNGC) is a principle-based, globally acknowledged framework to encourage businesses worldwide to adopt sustainable and socially responsible policies and to report on their implementation. Companies voluntarily pledge to adhere to the universal corporate responsibility principles.

Our commitment to the ten principles of the Global Compact enables us to clarify our corporate responsibility and enhance our activities related to human rights, labor standards, the environment and anti-corruption.

UN GLOBAL COMPACT PRINCIPLE

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Our Risk and Compliance Program pages 25-30, Respecting Human Rights, page 18, Diversity and Inclusion, and Equal Employment Opportunity, page 33

Principle 2: make sure that they are not complicit in human rights abuses.

LABOR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Our Risk and Compliance Program pages 25-30, Diversity and Inclusion and Equal Employment Opportunity, page 33, Respecting Human Rights, page 18

Principle 4: the elimination of all forms of forced and compulsory labor;

Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect of employment and occupation

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Operating Sustainably, page 46, Managing Our Impact, page 51

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

ANTI CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Our Risk and Compliance Program pages 25-30

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GRI STANDARD DISCLOSURES

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GRI 102: GENERAL DISCLOSURES			
102-1	Name of organization	GBT JerseyCo Limited, d/b/a American Express Global Business Travel	N/A
102-2	Activities, brands, products, and services	About GBT	7
102-3	Location of headquarters	3rd Floor, 44 Esplanade, St Helier, Jersey, JE4 9WG	N/A
102-4	Location of operations	Our Global Footprint	
102-5	Ownership and legal form	GBT is a joint venture corporation formed by American Express Travel Related Services Company and an investor group led by Certares. Each has a 50% ownership stake in the joint venture.	N/A
102-6	Markets served	Our Global Footprint	9
102-7	Scale of the organization	About GBT	7
102-8	Information on employees and other workers	About GBT; Social, Diversity and Inclusion	7, 31-44
102-10	Significant changes to the organization and its supply chain	GBT completed the integration of HRG and completed the acquisition of DER Business Travel (DER BT).	8
102-11	Precautionary Principle or approach	Environmental, Social, and Governance at GBT	14-30
102-12	External initiatives	Environmental, Social, and Governance at GBT, Supporting the UN Sustainable Development Goals, UN Global Compact: Communication on Progress	14-30, 17, 62
102-13	Membership of associations	Memberships and Sponsorships	12-13
102-14	Statement from senior decision-maker	CEO Message	5

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102-16	Values, principles, standards, and norms of behavior	Environmental, Social, and Governance at GBT, Our Code of Conduct	14-21, 24
102-17	Mechanisms for advice and concerns about ethics	Environmental, Social, and Governance at GBT, Our Code of Conduct	14-21, 24
102-18	Governance structure	Our Corporate Governance Structure	23
102-19	Delegating authority	Environmental, Social, and Governance at GBT, Our Governance of ESG	14-21, 20
102-20	Executive-level responsibility for economic, environmental, and social topics	Our Governance of ESG	20
102-21	Consulting stakeholders on economic, environmental, and social topics	How We Engage Our Stakeholders	15
102-22	Composition of the highest governance body and its committees	Our Corporate Governance Structure	23
102-23	Chair of the highest governance body	Our Corporate Governance Structure	23
102-26	Role of highest governance body in setting purpose, values, and strategy	Our Governance of ESG	20
102-29	Identifying and managing economic, environmental, and social impacts	Environmental, Social, and Governance at GBT	14-21
102-30	Effectiveness of risk management processes	Our Governance of ESG	20
102-31	Review of economic, environmental, and social topics	Our Governance of ESG	20
102-32	Highest governance body's role in sustainability reporting	Our Governance of ESG	20

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102-40	List of stakeholder groups	How We Engage Our Stakeholders	15
102-42	Identifying and selecting stakeholders	How We Engage Our Stakeholders	15
102-43	Approach to stakeholder engagement	How We Engage Our Stakeholders	15
102-44	Key topics and concerns raised	How We Engage Our Stakeholders	15
102-46	Defining report content and topic Boundaries	How We Engage Our Stakeholders, Materiality	15, 16
102-47	List of material topics	How We Engage Our Stakeholders, Materiality, Our Approach to ESG	15, 16, 21
102-48	Restatements of information	There are no restatements of information	N/A
102-49	Changes in reporting	There are no changes from the previous reporting period	N/A
102-50	Reporting period	January 1, 2019 - December 31, 2019	N/A
102-51	Date of most recent report	June 2019	N/A
102-52	Reporting cycle	Annual	N/A
102-53	Contact point for questions regarding the report	Nora Lovell Marchant. nora.lovellmarchant@amexgbt.com	71
102-54	Claims of reporting in accordance with the GRI Standards	Report prepared in accordance with the GRI Standards: Core option	N/A
102-55	GRI content index	GRI Index	63
102-56	External assurance	This report was not externally assured.	N/A

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GRI Content Index

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103-2	The management approach and its components	Our Approach to ESG	21
103-3	Evaluation of the management approach	Our Governance of ESG	22
GRI 201: ECONOMIC PERFORMANCE			
103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders	14-21, 15
103-2	The management approach and its components	Our Governance of ESG	20
103-3	Evaluation of the management approach	Our Governance of ESG	20
201-1	Direct economic value generated and distributed	About GBT, Our Products and Services	7, 10
201-2	Financial implications and other risks and opportunities due to climate change	Our Decarbonization Journey	47-50
GRI 302: ENERGY			
103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders, Operating Sustainably	14-21, 15, 46
103-2	The management approach and its components	Our Governance of ESG, Our Decarbonization Journey	20, 47-50
103-3	Evaluation of the management approach	Our Governance of ESG, Our Decarbonization Journey	20, 47-50
302-1	Energy consumption within the organization	Our Decarbonization Journey	47-50
302-4	Reduction of energy consumption	Our Decarbonization Journey	47-50

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103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders, Operating Sustainably	15-21, 15, 46
103-2	The management approach and its components	Our Governance of ESG, Our Decarbonization Journey	20, 47-50
103-3	Evaluation of the management approach	Our Governance of ESG, Our Decarbonization Journey	20, 47-50
305-1	Direct (Scope 1) GHG emissions	Our Decarbonization Journey	47-50
305-2	Energy indirect (Scope 2) GHG emissions	Our Decarbonization Journey	47-50
305-3	Other indirect (Scope 3) GHG emissions	Our Decarbonization Journey	47-50
305-4	GHG emissions intensity	Our Decarbonization Journey	47-50
305-5	Reduction of GHG emissions	Our Decarbonization Journey	47-50
GRI 401: EMPLOYMENT			
103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders	14-21, 15
103-2	The management approach and its components	Our Governance of ESG, Investing in Our People	20, 32
103-3	Evaluation of the management approach	Our Governance of ESG, Investing in Our People	20, 32
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Employee Benefits	43
401-3	Parental leave	Supporting our Colleagues with Family Responsibilities	44

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103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders	14-21, 15
103-2	The management approach and its components	Our Governance of ESG, Investing in Our People	20, 32
103-3	Evaluation of the management approach	Our Governance of ESG, Investing in Our People	20, 32
404-1	Average hours of training per year per employee	All GBT employees complete mandatory regulatory compliance training exceeding at least three hours plus additional job-specific trainings.	N/A
404-2	Programs for upgrading employee skills and transition assistance programs	Employee Learning and Development	38-39
404-3	Percentage of employees receiving regular performance and career development reviews	All GBT employees receive regular performance and development reviews.	N/A
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY			
103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders	14-21, 15
103-2	The management approach and its components	Our Governance of ESG, Equal Employment Opportunity	20, 33
103-3	Evaluation of the management approach	Our Governance of ESG, Equal Employment Opportunity	20, 33
405-1	Diversity of governance bodies and employees	Diversity and Inclusion	34

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103-2	The management approach and its components	Our Governance of ESG, Our Code of Conduct, Equal Employment Opportunity	20, 24, 33
103-3	Evaluation of the management approach	Our Governance of ESG, Our Code of Conduct, Equal Employment Opportunity	20, 24, 33
GRI 412: HUMAN RIGHTS ASSESSMENT			
103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders	14-21, 15
103-2	The management approach and its components	Our Governance of ESG, Respecting Human Rights, Our Code of Conduct	20, 18, 24
103-3	Evaluation of the management approach	Our Governance of ESG, Respecting Human Rights, Our Code of Conduct	20, 18, 24
412-2	Employee training on human rights policies or procedures	Our Code of Conduct, Risk and Compliance Training	24, 26
GRI 414: SUPPLIER SOCIAL ASSESSMENT			
103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders	14-21, 15
103-2	The management approach and its components	Our Governance of ESG, Responsible Procurement	20, 30
103-3	Evaluation of the management approach	Our Governance of ESG, Responsible Procurement	20, 30

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103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders	14-21, 15
103-2	The management approach and its components	Our Governance of ESG, Responsible Marketing	20, 28
103-3	Evaluation of the management approach	Our Governance of ESG	20
GRI 418: CUSTOMER PRIVACY			
103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders	14-21, 15
103-2	The management approach and its components	Our Governance of ESG, Data Privacy and Information Security	20, 29
103-3	Evaluation of the management approach	Our Governance of ESG, Data Privacy and Information Security	20, 29
GRI 419: SOCIO-ECONOMIC COMPLIANCE			
103-1	Explanation of the material topic and its Boundary	Environmental, Social, and Governance at GBT, How We Engage Our Stakeholders	14-21, 15
103-2	The management approach and its components	Our Governance of ESG, Our Risk and Compliance Program	20, 25
103-3	Evaluation of the management approach	Our Governance of ESG, Our Risk and Compliance Program	20, 25

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We value feedback from all our stakeholders. If you have any substantive comments or questions regarding our ESG Report, please contact:

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