

COUNTRY-SPECIFIC ADDENDUM BELGIUM

I. Purpose of the Country Specific Addendum Belgium

AMEX Belgium is committed to conducting business operations in accordance with the highest standards of ethical and legal business conduct. That commitment is reflected in AMEX Code of Conduct, which sets forth the ethical and legal principles that are fundamental to the way in which AMEX Group conducts its business operations.

In addition to the existing AMEX global reporting channels (e.g. AMEX Global Ethics Line), it is possible to report breaches within the material scope of this Addendum related to AMEX Belgium (as defined below) through the local reporting system for AMEX Belgium, which is managed by the respective local reporting channel managers (hereinafter the "Local Reporting Channel Manager" or "Local Reporting Channel Managers").

This country-specific addendum for Belgium (hereinafter the "Addendum") regulates AMEX Belgium's local reporting channels (hereinafter "the Local Reporting Channel" or "the Local Reporting Channels"). AMEX Belgium includes the following AMEX group local subsidiaries in Belgium: American Express Europe SA and American Express Payments Europe SL (hereafter jointly referred as "AMEX Belgium").

The Addendum supplements the AEMP17 - Whistleblowing Claims Policy (hereinafter the "Global Policy") and supersedes the GCO Protocol - Handling whistleblower complaints in the European Union. The Addendum prevails over said documents in case of discrepancy.

II. Material Scope of the Local Reporting Channel

AMEX Belgium's Local Reporting Channel allows reporting about the following breaches:

- a) Breaches related to: (i) public procurement; (ii) financial services, products and markets, and prevention of money laundering and terrorist financing; (iii) product safety and compliance; (iv) transportation safety; (v) environmental protection; (vi) radiation protection and nuclear safety; (vii) food and feed safety, animal health and animal welfare; (viii) public health; (ix) consumer protection; (x) protection of privacy and personal data, and the security of networks and network and information systems; (xi) the fight against tax fraud; (xii) the fight against social fraud;
- b) Breaches affecting the financial interests of the Union; and
- c) Breaches relating to the internal market.

Without prejudice to the foregoing, in the event that the facts reported do not fall under a) to c) above, the rights and guarantees established in the Act of November 28, 2022 on the protection of persons who report breaches of national or Union law within legal entities in the private sector (hereinafter the "Belgian Whistleblower Act") will not apply.

Information of which the disclosure is prohibited because it is covered by national security ("*la sécurité nationale*" / "*ationale veiligheid*"), because it concerns classified information ("*informations classifiées*" / "*gerubriceerde gegevens*"), medical confidentiality ("*le secret médical*" / "*het medisch beroepsgeheim*"), because it is covered by the professional confidentiality of attorneys ("*informations et renseignements que les avocats reçoivent de leurs clients ou obtiennent au sujet de leurs clients*" / "*informatie en inlichtingen die advocaten ontvangen van hun cliënten of verkrijgen over hun cliënten*") or the confidentiality of judicial deliberations ("*le secret des délibérations judiciaires*" / "*geheimhouding van rechterlijke beraadslagingen*") is expressly excluded from the scope of this policy, in accordance with the applicable legal conditions as listed in Article 5, §1 of the Belgian Whistleblower Act.

III. Personal Scope of the Local Reporting Channel

AMEX Belgium employees can use the Local Reporting Channel to report the above mentioned potential reports (hereinafter the "Report" or "Reports"). AMEX Belgium also accepts Reports from persons who have acquired such information in the context of a working or professional relationship with AMEX Belgium.

The categories of persons who may make Reports by virtue of their working or professional relationship, in addition to employees of AMEX Belgium include independent contractors, any person working under the supervision and direction of contractors, sub-contractors service providers or suppliers, members of the board, members of management, auditing or supervisory corporate bodies, non-executives, volunteers and trainees, former employees (when the information was acquired during their employment relationship) or candidates (when they obtained the information as a result of the recruiting process) (hereinafter the "Reporter" or "Reporters").

In addition, employees and third parties who have obtained information outside the context of a working or professional relationship with AMEX Belgium can also use the Local Reporting Channel to report the above-mentioned potential Reports, provided that the Report relates to financial services, products and markets and the money laundering legislation.

IV. Local Reporting Channel Manager

For American Express Europe SA: Mrs. Karine Vanvolsem has been appointed as Local Reporting Channel Manager.

In the event that the Local Reporting Channel Manager is absent from work (e.g. due to holidays, sick leave), Mrs. Michèle Van den Meersche, International Colleague Strategic Partner, will substitute her.

For American Express Payments Europe SL: Mrs. Karine Vanvolsem has been appointed as Local Reporting Channel Manager.

In the event that the Local Reporting Channel Manager is absent from work (e.g. due to holidays, sick leave), Mrs. Michèle Van den Meersche, International Colleague Strategic Partner, will substitute her.

V. Reporting through the Local Reporting Channel

The respective Local Reporting Channels are accessible via:

- the reporting platform at <https://amex.ethicspoint.com/>, which allows to make online reporting in writing or orally, and is administered by an independent third party on behalf of AMEX Belgium;
- e-mail on the following address: Karine.Vanvolsem@aexp.com for American Express Europe SA and for American Express Payments Europe SL;
- a face-to-face meeting with the Local Reporting Channel Manager (or the person delegated by him/her) at the Reporter's request, which will be organised within a reasonable term following the request.

The registration of the Report will be done in line with the relevant legal requirements.

In the event that the Local Reporting Channel Manager is conflicted or is the subject of the Report, the Report can be submitted, at the Reporter's choice, through AMEX Global Ethics Line or sending an email to the person who substitutes the Local Reporting Channel Manager during his/her absence.

Reports may be made anonymously or on an open basis. However, AMEX Belgium strongly encourages Reports to be made on an open basis, where possible. Anonymous reporting may limit the extent to which we are able to fully investigate reports and take remedial action.

VI. Reception and handling of reports received through the Local Reporting Channel

Upon receipt of the Report, the Local Reporting Channel Manager will make a preliminary assessment as to whether the facts reported are within the material scope of this Policy, as well as the consistency and plausibility of the facts reported, and may request additional information from the Reporter if deemed necessary.

When a Report is received, the Local Reporting Channel will provide written acknowledgment of receipt of the same to the Reporter within seven (7) working days of the receipt of the Report.

The Local Reporting Channel Manager will also assess whether the Report reveals a structural issue or an issue that affects two or more entities of the group and/or can only be effectively addressed with a cross-border approach that AMEX Belgium has not the power to apply in a view of ensuring the effectiveness of the Whistleblower Directive. To the extent this is the case, the Local Reporting Channel Manager could either:

- I. Provide the Reporter with feedback setting out (to the extent applicable) in detail why it was not possible for the Local Reporting Channel Manager to investigate and/or address the Report locally. The Local Reporting Channel Manager will then explicitly recommend the Reporter to submit the Report directly through AMEX global reporting channels; or
- II. Request the Reporter's consent to share the Report with the appropriate group resources. Notwithstanding this, the Local Reporting Channel Manager remains responsible and accountable for any Report made via the Local Reporting Channel, including for maintaining confidentiality, giving feedback, and addressing the Report. In case the Reporter does not consent to the sharing of the Report with the appropriate group resources, the Local Reporting Channel Manager will provide the Reporter with feedback as set out in the above paragraph (i).

VII. Investigations of the Report and feedback to the Reporter

The Local Reporting Channel Manager will lead the investigation of the Report, establishing the necessary internal (and, to the extent the Report's consent was obtained, external) resources for the same as well as the persons who must have access to the Report and to the information obtained from the Report and from the internal investigation process (including personal data such as the identity of the Reporter).

The internal investigation process will be carried out in accordance with the corresponding internal investigations policy.

Once the investigation is concluded, the corresponding actions will be adopted according to AMEX policies and procedures and applicable local law.

The Local Reporting Channel Manager remains in charge of maintaining communication with the Reporter and, if deemed necessary, request additional information from the Reporter on the submitted Report.

In any event, the Local Reporting Channel Manager will contact the Reporter in writing within three (3) months of initial receipt of the Report or, if no response is received, within three months of the expiration of a period of seven (7) calendar days following the Report, to respond to the investigative actions, providing summary information on the steps planned or taken to follow up on the complaint and address the alleged breach reported, all subject to AMEX Belgium's other obligations (e.g. confidentiality and personal data protection obligations).

VIII. Safeguards

Once an in-scope Report has been submitted, the Reporter will benefit from the safeguards set forth in Chapters 6 and 7 of the Belgian Whistleblower Act, regarding, among other things, non-retaliation, and confidentiality.

IX. External Reporting Channels

AMEX Belgium strongly encourages Reports to be made internally through any of the reporting channels available so that any Reports can be resolved appropriately and quickly. However, should the Reporters decide to report their Reports externally in compliance with applicable provisions, besides the federal coordinator, they can report to the relevant Belgian competent authorities, i.e.:

- the Federal Public Service Economy;
- the Federal Public Service Finance;
- the Federal Public Service Public Health, Food Chain Safety and Environment;
- the Federal Public Service Mobility and Transportation;
- the Federal Public Service Employment, Labour and Social Dialogue;
- the Programming Public Service for Social Integration, Poverty Reduction, Social Economy and Metropolitan Policy;
- the Federal Agency for Nuclear Control; the Federal Agency for Medicines and Health Products;
- the Federal Agency for the Safety of the Food Chain;
- the Belgian Competition Authority; the Data Protection Authority; the Financial Services and Markets Authority;
- the National Bank of Belgium;
- the Belgian Audit Oversight Board;
- the authorities mentioned in article 85 of the law of September 18, 2017 on the prevention of money laundering and terrorist financing and on the restriction of the use of cash;
- the National Committee for the Security of Drinking Water Supply and Distribution;
- the Belgian Institute for Postal Services and Telecommunications;
- the National Institute for Health and Disability Insurance;
- the National Institute for the Social Security of the Self-employed;
- the National Employment Office;
- the National Social Security Office;
- the Social Intelligence and Investigation Service;
- the Autonomous Anti-Fraud Coordination Service; and
- the Shipping Control.

The way to make external reports can be found on the websites of the relevant competent authorities.

X. Personal data processing

Any Reports received will be treated with appropriate confidentiality and comply with current privacy and data protection legislation in force in each Relevant Country from time to time, in particular Regulation (EU) 2016/679 (GDPR) and implementing national laws (hereinafter "Data Protection Laws").

The purposes of the data processing are (i) to assess the Reports received through the Local Reporting Channel, (ii) to carry out the necessary internal investigations (iii) to record the operation and effectiveness of the Local Reporting Channel and to (iv) adopt the necessary measures to address the Reports received.

The lawful basis for the processing of data received as a result of a Report or in the framework of a subsequent internal investigation is Article 6(1)(c) of the General Data Protection Regulation (EU) 2016/679. In other words, the processing is necessary for compliance with the legal obligation to have an internal whistleblowing channel.

American Express Europe SA or American Express Payments Europe SL, as the case may arise, acts as the controller of personal data collected and processed in relation to the Local Reporting Channel.

The identity of the Reporter will be processed in a confidential manner. This means that the identity of the Reporter will not be disclosed to anyone beyond the authorized staff members competent to receive or follow up on Reports, except where this is a necessary and proportionate obligation imposed by Union or national law in the context of investigations by national authorities or judicial proceedings, or with the Reporter's explicit consent. This also applies to any other information from which the identity of the Reporter may be directly or indirectly deduced.

More generally, any processing of personal data, including the collection, exchange, transmission or storage of personal data as part of the collection and handling of Reports and their investigation, will be carried out in accordance with applicable Data Protection Laws, as further detailed in the relevant data protection information notices as may be amended from time to time, in particular the Privacy Notice for Employees as far as employees are concerned, and the general Data Protection Policy for non-employees.

Personal data which is manifestly irrelevant to the handling of a specific Report will not be collected or, if accidentally collected, will be deleted without undue delay. More generally, personal data will be kept for no longer than it is necessary and proportionate for the purpose for which it has been collected in compliance with applicable law.

Data subjects can exercise their rights of access, rectification, deletion, transfer (portability), limitation of the processing and objection as described in the relevant data protection information notices identified above. They also have the right to withdraw their consent at any time, and to file complaints with the competent data protection authority. In the case of Belgium, this is the Belgian Data Protection Agency (<https://www.dataprotectionauthority.be>).