

American Airlines Group Inc.
Statement on Public Policy Engagement and Political Participation
Adopted by the Board of Directors on July 22, 2020

Engagement in the policymaking process is important to the success of American Airlines. As a global airline, our Company is subject to numerous laws and regulations that govern various aspects of our business in the United States and around the world. We regularly express our views regarding policies that might impact our business, team members, shareholders and other stakeholders – and we are committed to participation in policy and political processes in a manner consistent with exemplary corporate governance practices.

In this spirit, we also encourage our team members to be active in our democratic society and provide them with opportunities to do so through the American Airlines Political Action Committee (“PAC”), funded entirely with voluntary team member contributions.

Political Contributions

Our Standards of Business Conduct prohibit the use of corporate funds or resources to help or promote any political candidate or party without prior approval from the Company’s Ethics Office. All political activities, including financial contributions by the Company or its Political Action Committee, are made in support of issues important to our Company and the aviation industry, and to our team members’ and shareholders’ interests in the Company. They are not based on the personal political preferences of individual team members, executives or board members.

Our Company does not use corporate funds to contribute to candidates, political party committees and political action committees, including SuperPACs and political committees organized under Section 527 of the Internal Revenue Code to promote the election or defeat of candidates for office. We also do not use corporate funds to make independent political expenditures or electioneering communications. If we make payments to other tax-exempt organizations, such as 501(c)(4)s, that the recipient may use for political purposes, we will publicly disclose those payments in our [Political Contributions Report](#). We may use corporate funds to support or oppose state and local ballot initiatives if an initiative would directly impact the interests of our Company and our shareholders; if we make any such contribution, we will disclose the amount and recipient in our [Political Contributions Report](#). We will maintain a five-year archive of these reports on our corporate website.

Participation in Trade Associations

As part of our public policy engagement, we are members of several trade and industry associations, such as Airlines for America (“A4A”), the International Air Transport Association (“IATA”), Business Roundtable and the United States Chamber of Commerce. Our involvement with those organizations allows us to gain insight into core issues for the airline industry and the business community and to advocate jointly for public policies that support an efficient, healthy, competitive industry and business environment. Our work with A4A and IATA in particular allows us to benefit from the opportunity to

share technical expertise and operational knowledge that strengthens the safety, customer service and efficiency of our operations. Our Company is also a member of other associations and various chambers of commerce and similar organizations around the world and at the state and local level that may engage in public advocacy.

Because some of these associations represent a broad range of companies and industries, there may be instances where an association's positions on certain issues may diverge from our views. However, we believe participating in these organizations is important to advancing our public policy priorities and our Company's future health. Management reviews and approves these memberships to ensure consistency with our Company's public policy objectives.

Federal disclosures regarding our lobbying activities are publicly available. Our public disclosure includes, among other things, our aggregate annual spending on trade association membership dues spent on lobbying. With respect to federal lobbying activity, we file Lobbying Disclosure Act Registration and Reports (Form LD-2) with the Secretary of the U.S. Senate and the Clerk of the U.S. House of Representatives, which reflect the specific bills and issues on which the Company engaged, as well as the total lobbying expenses our Company incurred during each calendar quarter. Click [here](#) for Forms LD-2 for 2018 and [here](#) for 2019.

Voluntary Political Participation by Team Members

Our team members are free to support the political process in a variety of ways on their own, such as through personal financial contributions or volunteering for candidates or organizations of their choice. However, their personal political activities must not suggest the Company's support and must not be conducted on Company time or involve any unlawful use of Company resources. Team members may not make or commit to political contributions on behalf of American Airlines, and American Airlines will not reimburse or otherwise compensate a team member for their personal political contributions.

The American Airlines PAC, registered with the Federal Election Commission ("FEC") and certain state and local campaign finance authorities, allows eligible team members to voluntarily pool their resources for political contributions to federal, state and local candidates. The PAC is funded solely by voluntary team member contributions and makes contributions on a bipartisan basis under our contribution policies and in support of our public policy goals. In deciding whom to support, the PAC prioritizes candidates who represent the communities we serve, who serve on relevant committees or in leadership positions, and who have shown support for policies important to our Company's long-term interests. All American Airlines PAC contributions are made without regard to the personal political preferences of individual directors, officers and team members.

Oversight, Governance and Compliance

American Airlines maintains a robust compliance program for advocacy and political activity, with oversight by senior and experienced leadership. We are committed to complying with this policy and with the letter and the spirit of all relevant state, federal and international laws and regulations. This

commitment and our organization and leadership help focus our public policy engagement on the issues most relevant to the long-term interests of our Company, team members, customers and shareholders.

The Corporate Governance and Public Responsibility Committee (“the Committee”) of our Board of Directors oversees this policy and the Company’s public policy engagement, political contributions and principal trade association memberships. The Committee, which is comprised entirely of independent directors, receives and reviews updates on these efforts at least annually. The Committee also reviews and approves changes to this policy.

Our Executive Vice President for Corporate Affairs, in consultation with members of our senior management team, oversees our political engagements, including any use of funds to further our legal, regulatory and public policy interests. American Airlines’ Global Government Affairs department is responsible for the day-to-day implementation of our public policy engagement and political contributions. The work of this department is led by our Senior Vice President for Global Government Affairs, who reports to the Executive Vice President for Corporate Affairs. The Senior Vice President is responsible for the department’s compliance with this policy and with applicable laws. The Global Government Affairs department works closely with American Airlines’ Senior Vice President and General Counsel and with outside counsel dedicated to government affairs and political law compliance matters to ensure adherence with all related rules and regulations and with best practices.

The Senior Vice President for Global Government Affairs also is responsible for administration and supervision of the American Airlines PAC, with oversight by the Executive Vice President for Corporate Affairs and the Board of Director’s Corporate Governance and Public Responsibility Committee. We report American Airlines PAC donations to the FEC (FEC ID No. C00107300) and certain state and local campaign finance authorities as required by law.