

CODE OF CONDUCT

AIRBUS

AIRBUS

A blue-tinted photograph of an Airbus office interior. In the foreground, four people (three men and one woman) are seated around a table, engaged in a discussion. In the background, a large glass wall reflects the sky and the word "AIRBUS" is visible in large, bold letters. The overall atmosphere is professional and collaborative.

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“ A CODE FOR THE NEXT CHAPTER...”



Dear Colleagues,

Within Airbus, there is an undeniable link that unites us all—the passion for our products. This passion and the quality of our products have been the foundation of our success over the past 50 years, building our strong reputation around the world. The Airbus brand stands for a bold and innovative spirit found in few other industries.

While it takes a lifetime to build a good reputation, it takes only a moment to destroy it. One bad decision can ruin our brand.

In challenging times, we must reaffirm and demonstrate our commitment to the core values upon which our company was built.

This starts with our commitment to conduct business with integrity—for the good of our company, our people, our customers, and our shareholders.

Through our products, Airbus is one of the most exemplary companies worldwide. We aim as well at being a leader in corporate integrity and we recognise that this is synonymous with sustainable business growth and creation of a competitive advantage for Airbus over time.

This new Code of Conduct signifies the continuation of the remarkable progress Airbus has made on compliance and responsible business practices over the past several years. Whilst there is still work to be done, I count on all of you to continue supporting this journey by embodying the principles set forth in this Code of Conduct in every aspect of your day-to-day work.

In addition to reaffirming our values, this Code of Conduct is designed to provide you

with user-friendly and practical guidance on the proper conduct needed to build business relationships between Airbus and its stakeholders, which are based on trust.

Read it carefully and make sure it is respected around you. If you see something unusual in your work or environment, I encourage you to Speak Up.

I am proud to be working side-by-side with you towards our goal of building a better-connected, safer, and more prosperous world. Join me in focusing on what really matters: preserving our integrity and embracing our values for the purpose of serving the best interests of our great company Airbus.

Kind regards,

Guillaume FAURY

May 2019

Board of directors' **message**

Walking the Walk and Talking the Talk...

You cannot lead your people beyond where you are willing to go yourself. We take this principle to heart and strive to lead by example in supporting Airbus' commitment to be a responsible corporate citizen and to conduct its business with integrity and in compliance with all applicable laws.

To whom does this code of **conduct** apply?

From final assembly lines to our corporate boardroom, we embrace and demonstrate our adherence with this Code of Conduct throughout our organisation. This Code of Conduct applies to all Airbus employees and directors, regardless of their job title, responsibilities, seniority, or location, within every subsidiary or joint venture where we have control.

Additionally, Airbus promotes the adoption of strong ethical standards by our other stakeholders, including customers, suppliers, partners, and contractors. We have published this Code of Conduct in order to make it easily accessible to our employees, directors, and to these other stakeholders, whom we encourage to adopt similar standards.

Role of this code of conduct in our **Business**

This Code of Conduct is intended to provide you with an understanding of Airbus' expectations and standards for ethical behaviour and responsible business practices. Each chapter contains Do's and Don'ts as well as real-life examples that allow this document to serve as a reference guide when you have questions about how we conduct business.

Although this Code of Conduct provides practical examples on issues that arise frequently, it is impossible to anticipate every situation that may arise. When in doubt, we encourage you to seek advice and to Speak Up to disclose any situation that may violate laws or our internal policies and standards.

If you are a team leader or manager, you have a particular responsibility to create an environment in which members of your team feel confident and able to raise concerns, to listen carefully to their concerns, and to take all appropriate action in response.

Speak Up

Airbus is committed to maintaining a Speak Up culture by promoting an open and trusting dialogue with employees at all levels. All employees are encouraged to express their views, defend their opinions and point out unacceptable behaviour, especially behaviour that violates this Code of Conduct. Employees can raise concerns to their line manager, their Human Resources Business Partner, to a Legal & Compliance representative, or through the Airbus "OpenLine" (www.airbusopenline.com).

The OpenLine is a channel through which employees and other stakeholders may submit an alert securely and confidentially or anonymously. Alerts could relate to our Code of Conduct, policies and standards, or to compliance with applicable laws or regulations. The use of the OpenLine is entirely optional and voluntary, and there will be no consequences for employees who do not use the system.

Airbus protects those who Speak Up and raise concerns appropriately and in good faith; we do not retaliate against anyone who raises a concern, or against those who assist in investigations of suspected violations. Retaliation can take many forms, both direct and indirect, including: harassment, exclusion from meetings, sanction, dismissal or other discriminatory measures, in particular related to compensation, profit-sharing, free share awards, job classification, performance reviews, promotion, training, transfers, contract renewal, etc. If you believe you have been retaliated against for reporting an issue, please contact a Legal & Compliance staff member.

Raising questions

In addition to reporting potential wrongdoing, Airbus encourages its employees to seek clarification when needed. This Code of Conduct cannot address every challenging situation that may arise. If you have questions about the topics covered in the Code of Conduct, you may address them to the points of contact listed in each chapter or to:

- Your line manager
- A Legal & Compliance staff member
- Your Human Resources Business Partner
- compliance@airbus.com

Mail: Airbus Ethics & Compliance
2 Rond-Point Emile Dewoitine
BP 90112
31703 Blagnac cedex - France

In addition to Legal & Compliance staff, Airbus has a network of part-time Ethics & Compliance Representatives (ECRs), spanning all Divisions, functions, and regions. Although the ECR network members are not compliance experts, they play an important role in promoting Airbus' E&C programme and culture (including Airbus' Values and Code of Conduct) and serve as a point of contact for any employee who has questions about the E&C programme or wishes to raise an E&C concern.

Airbus Core Values

The chapters in this Code of Conduct are organised around the themes of **People, Business Integrity, and Products, Assets, and Data**. Each chapter builds upon the core values that you, our employees, selected and defined for our company:

- **We Are One / Team Work!**
- **Customer Focus**
- **Reliability**
- **Respect**
- **Creativity**
- **Integrity**

These six core values lie at the heart of Airbus and help us define not just **what** we do but **how** we do it. Our collective mission is to live these values in everything we do, every day.

One Airbus

Our Values





Our PEOPLE

“We feel, act, and behave as one large family to create an engaging and inclusive workplace that favours well-being, personal development, and trust to drive best in class team performance.”

“We treat each other and all stakeholders as we wish to be treated, with respect, embracing diversity.”

“We are curious, courageous, passionate, open-minded, and recognise creativity at all levels.”

Airbus Values

Leadership

Key Principles

At Airbus, we recognise that leaders are everywhere: transforming the company, pulling the organisation forward, influencing others to pursue collective goals, empowering and coaching teams, and investing energy to drive performance. We rely on team leaders and managers, at every level of the company, to accept responsibility for instilling a culture of integrity within Airbus.



DO

- Value, support and develop others, by thinking and acting as an authentic team player, and managing any risk or conflict proactively.
- Be genuine and humble, act with integrity, and respect different points of view.
- Encourage a Speak Up culture in which employees feel comfortable discussing risks or raising concerns, by taking the necessary time to listen and promote dialogue and feedback.
- Take timely and well-considered decisions in the interest of Airbus, and assume personal responsibility and accountability for working in accordance with this Code.



DON'T

- Rush when making complicated decisions.
- Deny accountability or hide behind hierarchy when communicating difficult messages.
- Spread rumours, denigrate, or undermine the work of team members or other colleagues.
- Assume you are ever done learning.



Q&A

I try to lead with enthusiasm. What more can I do to motivate my colleagues?

Find ways to connect your colleagues' work to the big picture and the importance of their role in the development of Airbus' products and services. Encourage colleagues to express their differing points of view and give each view consideration - even the quietest voice in the room can bring value. Always treat colleagues with respect.

I am an expert in my field but am curious about what others are doing in the company and whether a career move may be good for me. What can I do?

Great! Airbus leaders are constant learners. Even if you are an expert in your field, the beauty of Airbus is that there is constantly room to grow and learn about other parts of the company, the global issues that affect our work, and developments in your own field. We encourage you to seek out these opportunities whether on-the-job, through courses offered by Airbus, or otherwise.



Key Airbus Document to Reference

- Airbus Leadership Model



Contacts

- Human Resources Centre of Expertise "Leadership, Inclusion & Cultural Evolution"
- Your Human Resources Business Partner

Health & Safety

Key Principles

Airbus is committed to pursuing the highest standards of health and safety and has adopted the principles of International Standard ISO 45001. Our priorities are:

1. protecting our people and the business from health and safety risks that could arise from our work activities,
2. fostering a health and safety culture in which we all accept appropriate responsibility for ourselves and others, and
3. ensuring good management of work-related health, safety, and well-being as an ethical and commercial imperative.



DO

- Take responsibility for your health and safety and that of others.
- Identify and mitigate health and safety risks before you start work.
- Speak Up when safety, health, or integrity at work is compromised in any way.
- Aspire to zero work-related injuries or instances of ill-health.



DON'T

- Compromise on health and safety.
- Ignore health and safety rules and procedures.
- Ignore when others work unsafely.
- Forget to report any accidents to your line manager or your local health and safety practitioner.



Q&A

What should I do if I have a safety concern?

You should stop your task and ensure your safety and the safety of others before resuming work. You should also report any safety issues to your line manager or local health and safety practitioner immediately.

What should I do if I have an accident?

First, you should take immediate action to protect against further damage and should call for help if needed. Next, always report accidents and incidents to your line manager or local health and safety practitioner, and record the event in accordance with company requirements. The lessons learned from your accident could help prevent someone else from being injured in the future.

What should I do if I do not have my personal protective equipment (PPE)?

You should never work without the required PPE. Ask your line manager or local health and safety practitioner how to get the appropriate PPE and, if necessary, the training on how to use it.



Key Airbus Document to Reference

- Airbus Occupational Health and Safety Policy



Contact

- Health and Safety function

Fostering our Talent through Inclusion & Diversity

Key Principles

At Airbus, diversity is a core part of our identity, with employees from more than 130 countries.

We recruit, select, and develop our people on merit, irrespective of their race, colour, religion, gender, age, sexual orientation, gender identity, marital status, disability, or any other similar status.

We strive to create an inclusive workplace where differences are embraced and where we leverage our differences to achieve better business outcomes. Regardless of who you are or where you come from, Airbus supports your professional development. Airbus' success depends on our employees' success.



DO

- Treat everyone you meet in the course of business with fairness, respect, and dignity.
- Build high-performing, innovative teams by drawing out the collective wisdom of our diverse workforce.
- Speak Up if you witness or are aware of any behaviour that you believe constitutes bullying, harassment, or discrimination.
- Challenge inappropriate behaviour and report improper conduct.



DON'T

- Discourage or prevent others from growing professionally, or concentrate only on employees viewed as high potential - development is for all.
- Engage in any form of harassment, including unwelcome expressions, gestures, comments, or physical contact.
- Ignore evidence of discrimination around you.



Q&A

I am enthusiastic about diversity but I worry that others may not share the same vision. What can I do to create a more diverse workplace?

You can discuss diversity with your colleagues and highlight the benefits of having a diverse and inclusive workplace. Beware of the impact of your personal preferences as you recruit and assign projects. If you witness discrimination, be courageous and challenge inappropriate behaviour. Your Human Resources Business Partner can propose other tools for supporting Airbus' work in this space.

I try to build diverse teams because I have been told that our differences will allow us to deliver better outcomes, but I find we lose time navigating cultural and language barriers. Wouldn't it be more efficient to create teams of people who have similar backgrounds?

Be patient and continue working in diverse teams. Studies show that although diverse teams take longer to find a harmonised approach, they achieve better results overall.



Key Airbus Documents to Reference

- Inclusion & Diversity community on the Hub
- My Development community on the Hub



Contacts

- embrace.diversity@airbus.com
- Human Resources Centre of Expertise "Leadership, Inclusion & Cultural Evolution"
- Your Human Resources Business Partner

Human Rights

Key Principles

Human rights are inherent to everyone whatever their nationality, place of residence, gender, national or ethnic origin, religion, or any other similar status. Airbus has a zero tolerance approach to all forms of human rights abuses, including modern slavery and child labour, within our business, operations, and supply chain.



DO

- Treat everyone with dignity and respect.
- Ensure that you know how to identify and report all forms of human rights abuse.
- If you think anybody is in immediate danger as you are performing your job, make a report directly to the police or other entity best-placed to protect the individual and alert Airbus.



DON'T

- Turn a blind eye or be afraid to report anything that you think violates someone's human rights, even if they are working for one of Airbus' suppliers.
- Attempt to address an issue yourself outside of the appropriate reporting channels.



Q&A

In the country where one of our suppliers is based, it is legal to hire someone who is 12 years old. I recently learned that this supplier employs a number of 12 year olds. Is this acceptable to Airbus?

No. Airbus is committed to the elimination of child labour and will not work with third parties that use child labour in their operations. The International Labour Organisation (ILO) sets the general minimum age for employment or work at 15 years (13 for light work) and the minimum age for hazardous work at 18 (16 under certain strict conditions). If you are concerned about a supplier's practices, you should report the issue to either your line manager or a Legal & Compliance staff member, or confidentially via the OpenLine.

On a visit to a supplier, I was concerned to see evidence that some of their workers may be sleeping on the premises. What should I do?

This is a difficult and sensitive situation that is generally unacceptable on Airbus premises and could be an indication of modern slavery. If you are concerned, you should make a report to either your line manager or a Legal & Compliance staff member, or confidentially via the OpenLine. However, if you think people may be in immediate danger, you should report your concerns through local safety channels that can best protect the person who is in danger (e.g., Airbus management, law enforcement authorities, or otherwise).



Key Airbus Documents to Reference

- Airbus Responsibility & Sustainability Charter
- Airbus International Framework Agreement
- Airbus Supplier Code of Conduct



Contact

- Responsibility & Sustainability function

Labour Relations

Key Principles

Airbus has a history of engaging in constructive social dialogue with businesses and employers' organisations, trade unions, international organisations, and other stakeholders to pursue economic success, employment security, and the welfare of Airbus employees. By committing to comply with the International Labour Organisation (ILO) Conventions and the OECD Guidelines for Multinational Enterprises, Airbus recognises the rights of employees to form, join, and be active in trade unions and employee representative bodies in accordance with national laws, collective bargaining agreements, and local customs.



DO

- Ensure Airbus protects its employees' interests including through achievement of long-term financial success.
- Favour social dialogue as a means to support fair and equitable treatment of all our employees.
- Agree on training measures for employees that allow our workforce to develop professionally and enhance Airbus' competitiveness.



DON'T

- Interfere with or influence the free choice of employees to form or join a body to represent their interests.
- Treat members of trade unions more or less favourably than other employees.



Q&A

I am not sure whether a matter should involve input from employee representatives. Whom can I ask about this?

You should reach out to your local Human Resources function, which will be able to help you make this determination.



Key Airbus Documents to Reference

- International Framework Agreement
- Agreement on the Airbus SE-Works Council and its derived Division European Committees
- Airbus Global Forum



Contacts

- Human Resources Industrial Relations function
- Legal & Compliance function

Community Impact

Key Principles

We seek to contribute to the economic development and social well-being of communities by partnering with local stakeholders and international organisations, and by encouraging Airbus employees to donate their time to worthy causes through the Airbus Foundation and other channels. Charitable donations, together with political contributions, must always be reviewed and approved prior to being made and must be accurately recorded in Airbus' books and records.



DO

- Familiarise yourself with the Responsibility & Sustainability Charter.
- Learn more about the work of the Airbus Foundation and the volunteer opportunities available to employees in support of its activities.
- Make sure that company charitable contributions are appropriate and proportionate.



DON'T

- Make any charitable donation on behalf of Airbus without receiving approval under the applicable Airbus policies on sponsorships and donations.
- Undertake activities that may present a reputational risk to the company.



Q&A

What community impact activities does the Airbus Foundation undertake?

The Foundation's mission focuses on two key pillars: Humanitarian Activities and Youth Development. There are several ways for employees to get involved, for example by volunteering for the Airbus Flying Challenge programme.



Key Airbus Documents to Reference

- Airbus Responsibility & Sustainability Charter
- Airbus Foundation website:
<https://www.airbus.com/company/airbus-foundation.html>
- Requirements for Sponsorships, Donations and Corporate Memberships



Contacts

- Responsibility & Sustainability function
- Airbus Foundation



Our **BUSINESS INTEGRITY**

“We have zero tolerance for corruption.”

“We act with integrity and take appropriate steps to eradicate unethical and non-compliant behaviour.”

Airbus Values

Anti-Bribery and Corruption

Key Principles

Airbus has zero tolerance for any form of bribery or influence peddling. We do not offer, pay, or accept bribes or kickbacks for any purpose, either directly or through a third party. We do not make facilitation payments or permit others to make them on our behalf. Before offering or accepting any gifts or hospitality, we ensure that the value is reasonable and allowed under Airbus internal policies and standards, and that the gift or hospitality will not be viewed as improperly influencing a business decision. Interactions with government officials or state organisations present particular risks that must be adequately addressed.



DO

- Conduct business with the highest integrity, always consistent with anti-bribery laws and our internal policies and standards.
- Inform Legal & Compliance if you become aware of any requests or solicitations made by customers, suppliers, or other third parties for improper payments.
- Declare and obtain pre-approval for any gifts or hospitality that exceed value thresholds set by Airbus.
- Attend required trainings tailored to your specific role at Airbus.



DON'T

- Offer, authorise, or promise anything of value in order to obtain or retain an improper advantage, including small payments meant to expedite a routine government action (facilitation payments).
- Work through a third party to make any promises or payments that you could not make under Airbus' internal policies and standards.
- Offer or accept any lavish or extravagant gifts or hospitality, or any cash gifts or cash equivalents like gift cards.



Q&A

What is bribery?

Bribery means promising, offering, giving, soliciting, or receiving—directly or indirectly—money or anything of value to or from another person, in order to obtain or retain business or to secure some other improper advantage. Bribery can be active or passive. Active bribery refers to a person who obtains, or tries to obtain, an improper advantage by offering or giving money or anything of value to a public official or private party. Passive bribery refers to a private party or public official who takes advantage of his or her position by soliciting or accepting money or anything of value, in exchange for performing (or refraining from performing) his or her duties impartially, or for exerting his or her influence inappropriately.

What is influence peddling?

In most countries, influence peddling is a form of bribery. It occurs when a person promises, offers or gives—directly or indirectly—money or anything of value to a public official or private party, so that the latter will abuse his or her real or supposed influence in order to obtain a distinction, employment, contract or other favourable decision from a public authority or administration, domestic or foreign.

What is a facilitation payment?

A facilitation payment is a small, unofficial payment to a low-level public official made to speed up or obtain a routine administrative process. Consistent with most anti-corruption laws, Airbus prohibits such payments.

I met a representative of a state-owned airline who requested an internship for his son. How should I react to this request?

Handle this request with caution because, under anti-bribery laws, this internship offer could be seen as a “thing of value” given by Airbus in order to receive an improper advantage from this public official. Consequently, explain to the representative that you are not in charge of applications, and refer him or her to the official Airbus application process. An internship should be offered only through the usual Human Resources channels, based on how the intern's background matches Airbus' needs.



I am organising a training session for potential customers at our headquarters in the south of France. Several of the attendees have asked me if I could organise a sightseeing trip for the group after the training session is over, which would include luxury meals and lodging over the weekend. What should I do?

It is legitimate for Airbus to provide reasonable assistance to customers, in particular those that may be visiting from another country. In this instance, Airbus could provide some logistical support, for example booking the hotel at which the customer would like to stay. However, we may not go beyond this and pay for the hotel, as doing so could be perceived as an attempt to inappropriately influence a potential customer. Anytime you are considering providing or receiving gifts or hospitality to or from a third party, you should refer to the Airbus Gifts & Hospitality Directive to ensure you are acting consistently with its requirements.

A former member of a local government is offering to perform a consulting mission for Airbus, arguing that he or she would use his or her relationships within the government to obtain the administrative permissions necessary for Airbus' development. What should I do?

Handle this request with extreme caution as this person could abuse his or her influence in ways that are illegal. In order to protect Airbus, before engaging a third party to assist in interactions with public authorities, you should ensure the legality of the mission and comply with the terms of the Lobbyists and Special Advisors Directive. You should contact a Legal & Compliance staff member who will help perform risk-based due diligence in order to ensure the integrity of the consultant and the legality of hiring him or her.

I must get an emergency visa within two weeks in order to travel on Airbus business. At the embassy, I was told by a public official that obtaining the visa will take a minimum of one month, but he offers to speed up the procedure in exchange for 20 euros cash. How should I react to this proposal?

This type of small, unofficial payment to a low-level public official is called a facilitation payment. Airbus prohibits any form of facilitation payment. Therefore, you should first ask whether the payment is required under local law and whether it is possible to get an official, government-issued receipt for the 20 euros payment to obtain an emergency visa. If the fee is not required by law or the agent refuses to provide an official receipt for this payment, explain to the public official that Airbus refuses this type of arrangement, regardless of the amount of the payment requested, and that you will inform your hierarchy of the risk of delay. Please inform your line manager or a Legal & Compliance staff member of the situation as soon as possible.



Key Airbus Documents to Reference

- Airbus Anti-Corruption Policy
- Airbus Gifts & Hospitality Directive



Contacts

- Your line manager
- Head of Airbus E&C, Business and Programmes
- compliance@airbus.com

Working with Third Parties

Key Principles

The nature of our work requires us to interact frequently with third parties. These third parties include customers, suppliers, distributors, resellers, lobbyists, and consultants, and any other person or entity that is not an Airbus employee or company. In order to ensure that we only work with reputable third parties who, like us, have zero tolerance for corruption and influence peddling, we perform robust, risk-based, due diligence prior to engaging a third party. In addition, we monitor our third parties throughout the life of the business relationship to ensure they operate to the highest standards of quality and integrity and provide Airbus with the value they have promised to deliver.



DO

- Properly categorise third parties to ensure they undergo an appropriate level of risk-based due diligence before being engaged.
- Notify Legal & Compliance staff immediately of any information suggesting that a third party presents ethical risks.
- Ensure third parties work for Airbus under a valid, approved contract.
- Monitor the work performed to ensure that the third party delivers the goods or services for which it has been contracted in a timely and professional manner.
- Take appropriate action if behaviour by a third party is contrary to the principles in this Code.



DON'T

- Assume that a well-drafted contractual provision is enough to protect Airbus from legal liability.
- Turn a blind eye or fail to report a concern about a third party.
- Attempt to bypass company policies related to third party selection and due diligence.



Q&A

I want to retain a consultant. I have contacted Procurement to make sure a proper tender process occurs. What else should I do to ensure the integrity of the on-boarding process?

All third parties present some risk to Airbus. For that reason, Airbus conducts risk-based due diligence on every third party with which it works. In addition to ensuring that Procurement processes are followed, you should categorise the third party under Airbus policies and procedures to ensure that the third party undergoes the appropriate level of due diligence. In order to properly categorise a third party, you will typically need to know the type of good or service to be provided, how the third party was identified for this particular work, whether the third party may interact with government officials or Airbus customers in the course of its work, and any other information related to the integrity of the third party. Legal & Compliance staff are able to assist in the categorisation if you have any questions.

I don't have time to wait for the screening process on a third party to be completed. Is the company protected if the third party promises in the contract to respect all laws?

Absolutely not! Contractual provisions, no matter how well drafted, are of limited utility when risk-based due diligence has not been performed on a third party. Not only can Airbus or its employees be held legally responsible for wrongdoing committed by that third party (such as the payment of bribes), but a poor or reckless choice to engage a third party, made in the absence of relevant facts that only a proper due diligence process could have uncovered, can severely harm Airbus' reputation as well.

I've learned that a current Airbus supplier also has the capability to provide consulting services that I think would help Airbus win an ongoing sales campaign. What can I do to make sure that this relationship is approved?

Third parties that provide services in support of a sales campaign are referred to as business partners within Airbus, and present a heightened risk of bribery and corruption. Therefore, while this third party may already be approved to work for Airbus as a supplier, it must undergo robust due diligence and be approved by a cross-functional committee under Airbus' Business Development Support Initiative (BDSI) Directive before it can be engaged to assist on any sales campaign.



I was instructed to end our business relationship with a specific company due to ethical concerns. I disagree that this company presents any serious concerns, and it is important to my business. Can I engage a different company that has the same owner?

No. If Airbus has determined that the company needs to end a business relationship due to risks presented by the third party, then you must not attempt to find other ways to engage this third party. Airbus' policies are intended to protect not only the company but also the livelihood and reputation of our own people. Do not expose yourself by attempting to circumvent them.

I am concerned about the integrity of a joint venture partner. What should I do?

The term "third party" does not only refer to suppliers or business partners. It encompasses every non-Airbus business or employee that conducts work with or for Airbus, including joint venture partners. If you have concerns about any third party, please Speak Up.

I know I need to monitor the relationships we have with third parties. In order to do so, I check all invoices against the contract and the purchase order. What else should I be doing?

Every Airbus employee who works with a third party plays an important role in protecting the company by helping monitor the third party's work. This monitoring can include ensuring that the third party provides its goods or services in a timely manner, that the goods or services are of the contracted quality, that Airbus is aware of any entity to which the third party has subcontracted work, that the third party is being paid to a legitimate bank account that does not pose compliance concerns, that the third party has not been accused of wrongdoing, etc. Employees should notify Legal & Compliance of any ethical issues that may arise with the third party in the course of its work.



Key Airbus Documents to Reference

- Airbus Anti-Corruption Policy
- Business Development Support Initiative (BDSI) Directive
- Lobbyist and Special Advisor (L&SA) Directive
- Supplier Compliance Review Directive and Method
- JV-M&A Anti-Corruption Directive
- Industrial Cooperation & Offset Anti-Corruption Method
- Supplier Code of Conduct



Contacts

- Head of Airbus E&C, Business and Programmes
- Procurement function
- ec-watchtower@airbus.com
- compliance@airbus.com

Anti-Money Laundering and Tax Evasion

Key Principles

Airbus is committed to fully complying with all applicable anti-money laundering (AML) and counterterrorism financing laws, and will only accept funds received from legitimate sources. In addition, Airbus only conducts business with reputable customers involved in legitimate business activities. Airbus also rejects doing business in a way that assists or facilitates tax evasion by our suppliers, customers, or other third parties.



DO

- Ensure AML and Know Your Customer (KYC) due diligence is performed on all potential new customers.
- Confirm the customer actually exists and that its funds are derived from legitimate business activities.
- Pay particular attention to customers that are controlled by public officials or politically exposed persons (PEPs).
- Be alert to red flags regarding tax evasion, including the location of bank accounts to which we make payments.



DON'T

- Open or maintain a customer relationship without prior AML clearance.
- Accept customer payments from entities other than the customer's own accounts.
- Work with a customer whose ownership cannot be established.
- Enter into agreements where the financial elements or systems are opaque or insufficiently documented.
- Agree to issue refunds to any third party to a bank account that is not the bank account from which the original payment was made.



Q&A

An operator flying Airbus aircraft acquired on the second-hand market approached me to request maintenance services, but refuses to provide KYC information. The operator has tried to pressure me not to ask again for the KYC information, arguing that it needs these services for safety reasons. How should I respond?

You should stay firm about the need for KYC information before agreeing to work with the potential customer, explaining that you are bound by Airbus' internal policies. You should also inform the Anti-Money Laundering Officer and your line manager of the situation.

Airbus has an obligation to return funds to a customer. The customer requests that Airbus return those funds to the account of the customer's affiliate or parent company, or to a third party. Is this okay?

No. You should explain to the customer that, in accordance with our internal policies, the funds can only be returned to the customer's own accounts.

I am considering working with a vendor based in and providing services in France that wants to receive payment in a bank account located in the Cayman Islands. Can I work with this vendor?

Bank accounts based in jurisdictions other than where a supplier is headquartered or providing services raise red flags, particularly when the bank account is located in a jurisdiction that is known to be a tax haven. You should involve a Legal & Compliance staff member prior to entering into any arrangement with this supplier.



Key Airbus Documents to Reference

- Airbus Requirements for Anti-Money Laundering / Know Your Customer
- Method for Anti-Money Laundering / Know Your Customer (Airbus)
- Anti-Money Laundering and Counter Terrorist Financing (Airbus Defence & Space)
- Know Your Customer & Anti-Money Laundering and Combating Terrorist Financing Instruction (Airbus Helicopters)



Contact

- AML Officer for your Division

Managing Conflicts of Interest

Key Principles

We do not allow personal interests to interfere, or appear to interfere, with our ability to make fair and objective decisions when performing our jobs in the best interest of Airbus. A conflict of interest is not necessarily a problem by itself, but failing to declare and manage one properly may have negative consequences for the employee and for Airbus. In particular, when negotiating with or hiring current or former military and civilian government officials, we must comply with all applicable laws, regardless of whether they will be on our payroll or engaged as consultants or subcontractors.



DO

- Discuss with your line manager any personal or professional relationships that could give rise to a conflict of interest.
- Make sure that conflicts of interest are disclosed, managed, and recorded.
- Contact Legal & Compliance or your Human Resources Business Partner when you have a question.



DON'T

- Conceal information on any actual or potential conflict of interest.
- Place yourself in the position of hiring or supervising a family member or close personal friend.
- Act on situations where your personal interests could appear to influence your business decisions within Airbus.



Q&A

My best friend has asked me if there is a possibility of employment at Airbus. How should I handle this question?

Airbus encourages employees to refer good candidates, so you can certainly refer the candidate internally. After having made a referral, however, you should refrain from getting involved in the hiring process or trying to influence any internal decision making in this respect. You should also not share any Airbus internal information with your friend in order to help him or her get the job, even if you believe he or she is the best-qualified candidate.

My cousin works for a company that is an Airbus supplier. My line manager has asked me to participate in the team that is responsible for assessing this tender. What should I do?

You should disclose this information to your line manager immediately. Your line manager might decide to assign another colleague to the team to avoid any conflict of interest.

I've been really impressed with the quality of work from a particular Airbus supplier and as a result I'd like to invest in the company. Is there any conflict of interest here?

Even though your involvement may only be financial, this could create a conflict of interest depending on your position within Airbus, your influence on purchasing decisions, the amount of your investment, and the importance of Airbus as a customer to the particular supplier. You should disclose the matter to your line manager and discuss the issue openly in order to identify whether a conflict of interest could exist.



Key Airbus Documents to Reference

- Airbus Conflict of Interest Directive
- Legal & Compliance community on the Hub



Contacts

- A Legal & Compliance staff member
- Your Human Resources Business Partner

Export Control

Key Principles

Governments establish export control laws and impose sanctions and embargoes in pursuit of a number of interests, including national security and preventing arms proliferation. It is fundamental that Airbus be a reliable exporter, as any violation of these laws may have serious consequences, including business disruption and fines. As a result, before working or transacting with any third party or engaging in any export, re-export, or transfer of controlled items, we must ensure compliance with export control laws within the relevant jurisdictions.



DO

- Contact the Export Control function for guidance if you are dealing with exports, re-exports or transfer of controlled items (including goods, services, software and technology).
- Contact the Export Control function as early as possible about new projects to avoid delivery show-stoppers.
- Comply with international and national sanctions and embargoes and contact the Export Control function when you are considering new projects that are in or involve entities from sensitive jurisdictions.
- Classify your products (hardware, blueprints, drawings, etc.) to ease licensing determination and applications.
- Segregate products covered by export control regulations.



DON'T

- Forget to factor in additional time to obtain an export control license in the overall project timeline.
- Assume that only military sales are subject to export control restrictions and/or sanctions.
- Assume that all information provided by vendors is accurate without verifying key information.



Q&A

Do I need to worry about export control laws if I do not work with military items?

Yes. Although many of our defence-related products are subject to export control restrictions, dual use items (items that can be used for both military and non-military purposes) can also be subject to export controls. Always seek help from the Export Control function.

I am starting a project with very tight deadlines. How can I help the Export Control experts to facilitate the licencing process?

There are several steps you can take: **(1)** classify the product early; **(2)** help our suppliers complete end-user certificates so both they and we can receive export licences to ship the products; and **(3)** explain the business context in order to ensure the relevant government agencies understand the project.

I recently learned that a foreign country imposed economic sanctions on an individual I believe is affiliated with an Airbus supplier or customer. What should I do?

You should immediately inform Legal & Compliance. Economic sanctions, even those issued by countries other than Airbus' home countries, may have an impact on the company's business.



Key Airbus Documents to Reference

- Airbus Export Compliance Directive
- Airbus Directive Regarding Business with Sanctioned Countries
- Airbus Directive – Requirements for Airbus Procurement Export Compliance



Contacts

- Head of Airbus Export Control
- trade-compliance.export@airbus.com

Competing Fairly

Key Principles

Competition laws are in force around the world to prevent agreements and practices that may significantly alter or unduly restrict competition in the market. We do not obtain competitive intelligence by illegal or unethical means—including through bribery. When working with customers such as governments and defence ministries on projects that may raise issues of national security, we will not seek unauthorised access to material, and will handle customer classified or proprietary marked information in accordance with the appropriate legislation, policies, and processes.



DO

- Keep exchanges with competitors at a very high level.
- Inform your line manager and a Legal & Compliance staff member if we have inadvertently received or used proprietary or confidential information that relates to competitors and legitimately belongs only to them or to a third party.
- Distance yourself from any meetings in which competitors exchange commercially sensitive information.
- Take extra care to secure Airbus information when leaving a workspace and to protect Airbus information when working outside of Airbus premises.



DON'T

- Collect competitive intelligence through illegal means or by failing to identify yourself clearly as an Airbus employee when collecting information.
- Engage in discussions about bid-rigging, price fixing, and market or customer allocation.
- Exchange information with competitors relating to prices, pricing methods or policies, margins, terms or conditions of sale, production capacity, or participation in tenders.
- Agree to any exclusivity or similar clauses without first consulting with Legal & Compliance.



Q&A

At an international air show, I am drawn into a discussion with employees from an Airbus competitor about the overall market environment and ongoing campaigns. What should I be careful of during such discussions?

While there is nothing inherently wrong about discussing the general market environment with our competitors, there is a boundary that should not be crossed: discussing or exchanging commercially sensitive information. This includes any information that is not in the public domain or information that, if disclosed, could result in harm to the commercial interests of a company vis-à-vis its competitors. If you have any doubt about whether the subjects you are discussing are commercially sensitive, leave the conversation or change discussion topics.

While preparing Airbus' response to a customer call for tender, another company suggests that it will submit an inflated offer to ensure Airbus wins this campaign and asks for the same in exchange in a future tender. Is this a win-win situation?

Not at all! Such behaviour violates competition law and can expose the company to significant legal liability. You should not agree to the competitor's proposal and should immediately inform Legal & Compliance.



Key Airbus Documents to Reference

- Airbus Antitrust Directive
- Airbus Antitrust Guidelines
- Antitrust Dos and Don'ts Leaflet
- Antitrust Drafting and Talking Tips Leaflet
- Guidelines for meetings with competitors



Contact

- Legal & Compliance, Competition Law team

Insider Trading

Key Principles

We encourage our employees to become shareholders in Airbus. However, you must not buy or sell shares in Airbus or any other company if you have inside information at the time of your contemplated transaction. Inside information is generally information that is non-public and that could have an impact on the share price of a company. Certain senior-level Airbus employees are prohibited from trading in Airbus shares during specific calendar periods (known as “No-Trading Periods”), irrespective of whether or not they hold inside information.



DO

- Make yourself aware of and always comply with the Airbus Insider Trading Rules.
- Maintain the confidentiality of any inside information to which you have access in order to avoid any accidental disclosure.
- Contact Legal & Compliance if you have questions about any potential inside information.



DON'T

- Buy or sell shares in Airbus or any other company if you have inside information at the time of your contemplated transaction.
- Discuss inside information with anyone outside the company, including friends and family.
- Disclose inside information to anyone else within Airbus unless you are authorised to do so.



Q&A

In my position, I am exposed to a lot of sensitive business information about our products, our strategy, and our operations. What distinguishes inside information from the rest of the confidential information to which I have access?

Inside information is information concerning any publically listed company, including Airbus, that: **(1)** is precise; **(2)** non-public; and **(3)** likely to have a significant effect on the share price of that company if made public.

I think I may have inside information, but I want to buy Airbus shares because I believe in our company. What should I do?

In case of doubt about whether or not a certain event or circumstance is considered to be inside information, contact a Legal & Compliance staff member for a more thorough review. Pending that review, you should not trade in any Airbus shares and should keep the information confidential.

I've just heard confidentially that Airbus is about to acquire another company. This sounds like an excellent time to buy shares in one or the other (or both), since the values are bound to rise when the deal is announced. Is it okay for me to go ahead and do so?

No, you cannot. As an Airbus employee, you are most likely to be considered an “insider” and therefore cannot buy or sell shares in either Airbus or the other company until the deal has been announced to the public.



Key Airbus Document to Reference

- Requirements for Insider Trading Rules



Contact

- Legal & Compliance, Airbus Insider Trading Rules Compliance Officer



Our PRODUCTS, ASSETS, AND DATA

“We partner with our customers
to deliver valuable and sustainable
solutions together.”

“Our reliability drives our competencies
and mindset to deliver on time,
on cost, and on quality.”

Airbus Values

Product Safety

Key Principles

It is a tragedy for anyone to lose their life or be injured in an accident. Airbus has a unique responsibility to the public to ensure that accidents are prevented. That is why ensuring the highest levels of product safety is Airbus' top priority. Every employee, regardless of level, must do his or her part to ensure that safety is never compromised. Employees are encouraged to report any concerns about product safety immediately.



DO

- Recognise our duty to keep the public and users of our products safe.
- Be aware of how you contribute to safety in your daily work.
- Speak Up and report any concerns about safety.



DON'T

- Remain silent when you have a safety concern.
- Engage in online discussions or make public comments about accidents, product failures or other operational events.



Q&A

I have accidentally damaged a product component. What should I do?

You should report any safety or quality concerns regarding our products via the appropriate channels and without fear of retaliation. These channels can include your management, your local safety or quality representative, directly to a member of the Product Safety function, or confidentially through the OpenLine.

I have seen some practices outside our company that may have an impact on safety within Airbus. What should I do?

Regardless of the origin of the issue, please report any safety concerns. Airbus' suppliers are an important part of our value chain, and we expect and require them to meet the highest safety standards. If you have concerns about a supplier, please Speak Up. Ensuring product safety requires the support of every employee.

I read some comments online about an accident or event and I believe they need to be corrected. What should I do?

Accidents or product failures involve complex factors that require in-depth analysis and thorough investigation. Additionally, the company has confidentiality obligations arising out of any investigations into these incidents. As a result, employees should never comment on accidents, product failures or other operational events unless they have a mandate from Airbus. Doing so could damage the company's reputation and expose Airbus to unnecessary legal liability.



Key Airbus Documents to Reference

- Airbus Product Safety Company Policy
- Corporate Safety Management System Manual
- Just & Fair Commitment



Contact

- Product Safety function

Environment

Key Principles

We have a responsibility to the global community to protect the environment in our operations and throughout our value chain. In addition, we must comply with and strive to exceed all applicable environmental laws and regulations wherever we do business. We therefore promote eco-efficiency in all of our business activities by striving to reduce the overall Airbus environmental footprint, particularly our use of hazardous substances and carbon dioxide emissions. We also engage with companies throughout the aerospace sector to reduce the environmental footprint of Airbus products in operation. Airbus expects its supply base to embrace, follow, and cascade our environmental sustainability principles.



DO

- Follow the local rules that apply to the storage and use of chemicals and to reducing our environmental impact (e.g., energy consumption, segregation of waste, prevention of pollution).
- Report any abnormal situations that could affect the local environment.
- Require our supply chain to reduce its own environmental footprint and to comply with environmental regulations as well as with Airbus' supplier requirements.



DON'T

- Mix different types of wastes when separate waste collection is available.
- Accept environmental practices in our supply chain that we would not accept in Airbus operations.



Q&A

A prospective supplier requested that I remove environmental requirements from our standard contract. Can I do this?

No. Airbus developed these requirements in order to support the application of our environmental sustainability principles across our supply chain and in order to support business continuity. To avoid business disruptions, it is important to have these requirements in place and to ensure that they are well understood by our suppliers. Specific cases or questions should be discussed with Environmental Affairs and Legal & Compliance experts.

I have noticed that many lights, computers, and other machines in my work space remain turned on, even at times when no one is present. What can I do to address this?

You may have identified an opportunity to take easy steps to reduce the energy usage of your office or work space. Start by speaking with your line manager to make sure that you understand what energy-saving measures are already in place, and to develop a plan to raise awareness among your colleagues to turn off lights, computers, and machines that are not in use. You can also reach out to Environmental Affairs for support and guidance.



Key Airbus Document to Reference

- Airbus Environmental Policy



Contact

- Environmental Affairs function

Protecting Our Assets

Key Principles

We each have a duty to protect Airbus' assets, including physical property, confidential information, and intellectual property against theft, damage, misuse, and improper disposal. We also have a duty to protect assets entrusted to us by third parties with whom we work. Where Airbus employees are granted access to government-classified information, any exchange or transmission of classified information or material must comply strictly with the required security processes and clearances. Employees should immediately report any actual or suspected incident or misuse of business assets to Airbus' Security function.



DO

- Protect all Airbus assets, including documents, confidential information, intellectual property, and physical assets (parts, office furniture, computers, etc.).
- Seek advice from Security prior to launching business, particularly if government-classified information is involved.
- Seek advice from the Intellectual Property team regarding any transactions involving Airbus intellectual property.



DON'T

- Grant access to IT tools to individuals who do not have the proper authorisation to access those tools.
- Use, modify, or disclose the proprietary information of third parties without authorisation.
- Bypass existing physical access control at Airbus sites.



Q&A

I want to enter into a partnership with a well-known company. Can I exchange sensitive information with the potential partner in the context of partnership negotiations?

You may share sensitive information with a third party, but only if you have a non-disclosure agreement (NDA) in place prior to communicating any Airbus confidential information. In addition, you must not solicit, accept, or use a third party's proprietary information (whether provided by a customer or otherwise) unless the owner of the data has agreed to its release and use.

What should I do if I think Airbus may be infringing a third party's intellectual property rights or if there is any unauthorised use of Airbus' intellectual property by a third party?

The improper use of a third party's intellectual property—whether intentionally or accidentally—can result in significant legal and financial risks for Airbus. If you are concerned about Airbus potentially infringing third parties' intellectual property rights, you should contact the Intellectual Property and Legal & Compliance functions as soon as possible.

A colleague does not have access to an IT tool for which I have administrative rights. Can I share my login information with that colleague?

You should not share your login information. Rather, you should create a new login for your colleague after receiving a justification file from the Airbus work package leader confirming the employee's need to access the tool.

A visitor to an Airbus site is stuck at a door to which I have access. What should I do?

You should not provide access to the visitor without identifying the host of the visitor and meeting with the host. If you cannot identify the visitor's host, bring the visitor back to the site's main entrance and inform Security.



Key Airbus Documents to Reference

- Airbus Information Management & Use of Information Systems and Technologies (IS&T) Facilities Charter
- Airbus Intellectual Property General Guidelines
- Airbus Intellectual Property Guidelines for Collaboration
- Airbus Intellectual Property Confidentiality



Contacts

- Airbus Security function
- travel.security@airbus.com
- classificationit.military@airbus.com

Maintaining Accurate Records

Key Principles

Beyond being paramount to ensuring our competitiveness in the market, our regulators require us to maintain accurate records. If we do not, we face severe penalties and risk adversely affecting our shareholders and our employees. For that reason, we must all ensure that the business information we create is accurate, timely, complete, fair, and understandable.



DO

- Follow Airbus' internal control procedures in maintaining our financial records.
- Maintain and destroy documents in accordance with Airbus' records retention schedules and procedures.
- Consult your line manager or Legal & Compliance with questions as to how long you should retain a document or how to destroy it properly.
- Speak Up if you have concerns about any business records.



DON'T

- Create or participate in creating records that attempt to mislead anyone or conceal any improper activity.
- Make false or misleading entries, or allow or facilitate improper or insufficient disclosures.
- Turn a blind eye to business records that raise red flags.



Q&A

Our department has crossed its budget limitations. To mitigate the situation, my line manager has requested that I transfer some costs and expenses to a different department that is under budget. Can I carry out my manager's request?

No. Inaccurately reporting costs and expenses is an artificial manipulation of the company's financial records and is strictly forbidden. Doing so could create civil and criminal liability for the company and the individuals involved.

A third party engaged by Airbus is contractually required to submit, along with its invoices, monthly reports of the services it has provided. Based on my interactions with this third party, I believe that the information in a report it submitted is not true or does not completely describe the third party's activities. What should I do?

If you have concerns about records or reports submitted by a third party, no matter how trivial, please raise the matter to Legal & Compliance immediately. If a third party submits an inaccurate or incomplete activity report, we do not know how work is being performed and whether Airbus funds are being used properly.



Key Airbus Document to Reference

- Airbus Anti-Corruption Policy



Contacts

- Legal & Compliance function
- A Finance representative

Data Privacy and Digital Ethics

Key Principles

Airbus is committed to protecting the privacy of individuals and to complying with applicable personal data protection laws and in particular with the European Union's General Data Protection Regulation (GDPR). In addition, digital technologies are becoming increasingly important in our company and our professional lives. While leveraging new digital technologies to enhance our business performance and customer satisfaction, we also commit that our employees will benefit from this development. Faithful to Airbus values, we are determined to conducting the digitalisation in a human and ethical manner that balances humanity and technology.



DO

- Collect personal data only to the extent it is strictly necessary to fulfil a lawful or legitimate purpose.
- Seek advice from the Data Protection team before transferring personal data outside the European Union.
- Immediately report any personal data breach.
- Use digital technologies in the service of the human being to enrich our customer experience as well as to develop the competencies and skills of our teams and every individual.



DON'T

- Assume that personal data collected for one purpose can be used for other purposes.
- Collect sensitive data (e.g., health data) if not required by law or agreed to by the data subject.



Q&A

I want to transfer information, which will include employee or third party personal data, to a USB key so that I can work from home. What other steps should I take before transferring this data?

Transferring employee or third party personal data onto removable media like USB keys presents particularly high risks, and should only be done in exceptional circumstances. For this reason, doing so must first be authorised by your line manager. If your line manager approves this request then you should make sure to always use an Airbus-approved, encrypted media device.

I want to create a “photo board” showing photographs of all my team members. Can I do this?

Photographs constitute personal data so you must obtain consent from all the individuals concerned before displaying their photographs. If any individual objects, their photo cannot be posted.

Can I collect health-related data on my team for well-being purposes?

This type of information is considered “sensitive” data. No processing of sensitive data—including health or genetic data, biometric data, information on political, religious, or philosophical beliefs, sex life or sexual orientation, trade union membership, racial or ethnic origins, or criminal record—is permitted, unless it is required by law or upon prior express agreement from the data subject.

Digitalisation will have a huge impact on the future working conditions of our employees. What is Airbus doing in this regard?

One impact of digital technology is the possibility of being constantly connected and available. While this increases the autonomy of our employees, we encourage all employees to consider how to approach this connectivity in order to achieve a healthy work-life balance.



Key Airbus Documents to Reference

- Personal Data Protection Directive
- Airbus Data Privacy FAQs



Contacts

- Personal Data Privacy community on the Hub
- ENSURE

Managing Our Communications

Key Principles

The Airbus brand and reputation is one of our most valuable assets. We must promote and protect our brand coherently, consistently, and accurately to maintain Airbus' strength in the market.



DO

- Send any requests for comment from the media to the Communications function.
- Secure approval before making any public statement about Airbus.
- Provide accurate information to the public regarding our business.
- Use care when speaking about Airbus on social media.



DON'T

- Provide information to the media without prior approval and guidance from the relevant department.
- Post images of Airbus premises on social media.
- Publically disparage any competitors' products, services, or employees.



Q&A

I received a call from a reporter asking me to comment for an article she is writing. I believe the reporter has some incorrect information about Airbus. How should I address this?

You should refer the reporter to the Communications function, which will determine how best to respond. While it is important for Airbus to provide accurate information to the public, our Communications team should manage all contact with the media.

Can I share a picture of myself at our production facility with my friends on social media?

Pictures of production facilities can only be taken and shared by authorised personnel, and in any case should never be shared on personal social media accounts. This is important to protect our intellectual property and value of our brand.



Key Airbus Documents to Reference

- Airbus Brand Directive
- Brand Management community on the Hub
- Airbus Golden Rules for Communications
- Airbus Social Media Guidelines
- Airbus Internal Editorial Rules



Contacts

- Employee Communications
- Brand Management
- News and Media Relations

AIRBUS

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