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# Standards of Business Conduct

Our Code of Conduct  
& Integrity Principles



# MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

The Board of Directors endorses the Standards of Business Conduct (“Standards”) and requires the leadership team to lead by example with respect to adherence to the Integrity Principles and these Standards.

While ethics and compliance is everyone’s responsibility, the Airbus Ethics & Compliance Officer oversees the Ethics & Compliance Programme under the leadership of the Airbus General Counsel. The Airbus Ethics & Compliance Officer is supported by dedicated resources to provide support and guidance in understanding and applying these Standards.

References in these Standards to “Airbus” are to Airbus SE and its subsidiaries.



Dear Colleagues,

While we work for different companies and in different locations around the world, we share one common roof - the Airbus brand, and one common foundation - our Integrity. Airbus inherited from its founding companies their long-existing dedication to integrity, quality, trust and innovation. Our commitment today to upholding those core values is what secures our success for tomorrow.

No matter which business we are in or what job responsibilities we have, it is not only what we do – but how we do it – that wins the trust of our colleagues and stakeholders. However, “doing the right thing” isn’t always obvious, particularly in the complex and highly regulated global businesses we are in.

These Standards provide valuable guidance on the most common ethics and compliance issues and set forth the mutual rights and obligations of our employees and Airbus. We should all take the time to read and understand them.

Thank you for your part in upholding our tradition of integrity and making Airbus and our family of companies great places to work and a source of pride for all of us.

Sincerely yours,

A handwritten signature in blue ink, appearing to be 'T. Enders', with a stylized flourish at the end.

**Tom Enders, Airbus CEO**

# Our Integrity Principles

- **Commitment to Our People**

Airbus believes that a workplace should be based on respect, honesty and fairness. We encourage innovation and employee engagement and are committed to maintaining high standards of quality, health and safety.

- **Commitment to Airbus**

Our employees are committed to avoiding any conflicts that might put their personal interests ahead of what is best for Airbus. Additionally, our employees are encouraged to speak up and seek guidance if they have any ethical or compliance concerns.

- **Commitment to Building Trust.**

Our employees protect the property and confidential information of Airbus and of our stakeholders. Protecting confidential data, keeping accurate records, and adhering to all laws governing our business are key to our long-term success.

- **Commitment to Conducting Ethical Business.**

Business meals, hospitality, and modest non-monetary gifts may be given or accepted if they reflect customary business practices. However, all business decisions must be based solely on the merits. Only clean business is sustainable business. Corruption is detrimental to the work environment, stifles innovation, and is illegal. Airbus has a zero tolerance policy towards corruption of any kind.

- **Commitment to Corporate Citizenship.**

Airbus is committed to being a good corporate citizen. We acknowledge our responsibilities towards the environment, our local communities, and our stakeholders.

- **Commitment to be Responsive.**

Airbus is committed to respond to employees' concerns and suggestions. Our Ethics & Compliance representatives are always available to offer guidance and support. Additionally, the Airbus OpenLine can be contacted to report an incident or raise a concern, confidentially and without fear of retaliation.

# Contents

<b>Our commitment to integrity</b>	<b>5</b>
<hr/>	
<b>1 Focusing on People</b>	<b>6</b>
<hr/>	
Fostering Our Talent	6
Promoting Diversity	7
Encouraging Open Dialogue	7
Ensuring Workplace Health and Safety	8
Protecting Personal Data	8
<b>2 Respecting and Protecting Assets and Information</b>	<b>9</b>
<hr/>	
Protecting Assets	9
Maintaining Accurate Records	10
Protecting Third-Party Information	11
Trading Securities	12
Managing Internal and External Communication	13
<b>3 Engaging in Proper Business Practices</b>	<b>14</b>
<hr/>	
Zero Tolerance of Corruption	14
Gifts and Hospitality	18
Identifying and Managing Conflicts of Interest	18
Anti-Money Laundering	19
Competing Fairly	19
Complying with Export Laws	20
Cooperating with Authorities	21
Treating Suppliers Fairly	21
Our Commitment to Product Safety and Quality	21
<b>4 Being a Good Corporate Citizen</b>	<b>23</b>
<hr/>	
Establishing Ethical Business Standards Globally	23
Conducting Responsible Sourcing	24
Supporting Our Communities	24
Striving for Eco-Efficiency	25
<b>What to do when you have a concern</b>	<b>26</b>
<hr/>	
OpenLine	26
Airbus Ethics & Compliance Office	27
<b>Index</b>	<b>28</b>
<hr/>	

# Our Commitment to Integrity

We conduct our business with integrity, respecting applicable laws and regulations.

These Standards provide guidance in key areas in order to help us operate in accordance with our Integrity Principles. They contain cross-references to some additional policies and other documents in order to provide easier access to more detailed guidance where necessary.

The Standards apply to all employees, officers and directors of Airbus and entities over which Airbus has full or joint control. Because we prefer suppliers and other business partners who share our values, these partners are expected to adhere to our integrity principles. These Standards cannot address every challenging situation that may arise. When in doubt, each of us has a responsibility to seek advice. In addition, we should disclose any situation that may violate laws or internal policies and standards.

We encourage a speak-up culture where employees are comfortable raising concerns or seeking advice, and managers listen and are responsive. In cases where a manager or supervisor cannot resolve questions and concerns, employees should seek the advice of an Ethics & Compliance or HR representative.

In addition, the Airbus OpenLine ([www.airbusgroupopenline.com](http://www.airbusgroupopenline.com)) provides a confidential, secure and easy way to report concerns.

# 1. Focusing on People

In keeping with its focus on excellence, we aim to attract, develop and retain leading-edge talent. We foster the continued engagement and empowerment of employees at all levels.

We promote an environment of trust amongst teams and an open and constructive dialogue with employees and their representatives.

## Fostering Our Talent

We recognise that by fully respecting employees' rights and dignity, we are creating a trusting workplace that also drives performance and innovation, a key to our competitiveness. Airbus signed an agreement with its European Works Council to express commitment to the fundamental principles of the International Labour Organisation conventions.

Individuals are selected for career advancement on the basis of their potential, their performance, their behaviour, and their willingness to work in and across different functions and countries.

While fostering individuality contributes to rich cultural diversity, our high performance culture requires common values and behaviours that govern our interaction with each other and with stakeholders. This is encouraged by our Leadership Model.

### **Key Airbus Documents to Reference:**

- *International Framework Agreement on Human and Labour Rights*
- *Leadership Model*

## Promoting Diversity

As a leading global player Airbus is a truly multinational organisation and considers cultural diversity as one of its greatest strengths. We promote and support diversity in race, gender, religion, national origin, political opinion, sexual orientation, social origins, age, physical or mental character and beyond. Therefore, discrimination against protected personal characteristics will not be tolerated.

Any form of harassment in the workplace, whether physical, visual or verbal is strictly prohibited.

### What is harassment?

Generally speaking, “harassment” is any form of behaviour with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive work environment.

Examples include unwanted sexual advances or conduct, threats and physical intimidation, as well as offensive comments, jokes and slurs.

## Encouraging Open Dialogue

We promote an open and trusting dialogue with employees at all levels.

Employees are strongly encouraged to openly communicate, discuss and clarify their questions or concerns, and management is encouraged to listen and be responsive.

Any direct or indirect retaliation, or attempted retaliation, against an employee who speaks up in good faith is strictly prohibited and will not be tolerated.

# Ensuring Workplace Health and Safety

We are committed to pursuing the highest health, safety and security standards in the workplace. We must familiarise ourselves with and follow all external health and safety laws and internal health and safety policies and procedures.

We also recognise our responsibility to uphold health and safety standards across the extended enterprise with suppliers, business partners and contractors.

**Key Airbus Document to Reference:**

- *Health and Safety Policy*

# Protecting Personal Data

Airbus collects, processes and uses personal data of its employees and partners to fulfil its operational activities. We comply with obligations resulting from the European regulations and, as applicable, with any local laws and regulations concerning how individual personal data is collected, processed and used. We must always respect and protect the privacy of our employees, customers, suppliers and partners.

**Key Airbus Documents to Reference:**

- *Binding Corporate Rules*
- *Policy for Employees' Personal Data Protection*
- *Policy for Customer, Supplier and Partners' Personal Data Protection*

# 2. Respecting and Protecting Assets and Information

We each have a duty to protect Airbus' assets, both tangible and intangible. We must work to ensure that none of these assets are stolen, damaged, misused or improperly destroyed. In addition, we should be aware of our responsibilities when accessing, using, modifying, storing or disclosing any Airbus asset.

## Protecting Assets

To protect assets, premises, staff, visitors, data, information systems and telecommunications networks from hostile acts and from competitors, a security policy has been implemented which is applicable to all parts of Airbus and associated third parties.

We must treat all property entrusted to us in a professional manner and in support of Airbus' business goals.

### What is Airbus property?

Airbus property includes:

- Physical property, such as facilities, plant equipment, tools and inventory, securities and cash, office equipment and supplies, information systems and software;
- Confidential and proprietary information, which includes information not yet publicly disclosed and internal business information, such as contract documentation, business processes, corporate strategies and assumptions and business plans;
- Airbus' intellectual property, including patents, trade secrets, designs, models, rights, inventions, software, processes, names, brands, domain names and information protected by trademarks and copyrights.

We must use Airbus' computers, data and telecommunication resources in a safe, ethical, lawful and productive manner. Under no circumstances should we use Airbus' computers and information systems and tools to pursue illegal or improper purposes.

Access to confidential and proprietary information is strictly on a need-to-know basis. This information can only be revealed to formally authorised co-workers or outside parties who need this information for legitimate business purposes, or if required by law.

We are encouraged to develop innovative solutions for products, services and business models. We must always ensure that we secure and protect Airbus' intellectual property and avoid knowingly infringing upon the intellectual property rights of others. Intellectual property refers to creative ideas and expressions of the human mind that possess commercial value and for which exclusive rights are recognised such as patents, trademarks and copyrights.

**Key Airbus Document to Reference:**

- *Security Policies*

## **Maintaining Accurate Records**

Our shareholders and our business partners as well as government regulators rely on the accuracy and correctness of the information contained within our business records. We therefore have a responsibility to ensure that the information we provide is accurate, timely, complete, fair and understandable.

In maintaining our financial records, we must follow Airbus' internal control procedures. We may not create, or participate in the creation, of records that

attempt to mislead anyone or conceal any improper activity. This means, in part, that we must never make false or misleading entries or allow or facilitate improper or insufficient disclosures.

We are expected to maintain and destroy documents in accordance with Airbus' records retention schedules and procedures. Consult a manager or your Legal & Compliance department with questions as to how long you should retain a document or how to destroy it properly.

## **Protecting Third-Party Information**

Our customers, suppliers and other partners often entrust Airbus with their own confidential and proprietary information. To be a trustworthy partner, we must handle third-party proprietary information in accordance with the terms of its disclosure and in strict compliance with all applicable laws and regulations.

We do not accept third-party proprietary information unless the owner of such information has agreed to its transfer. If we receive third-party proprietary information without authorisation, it must be promptly reported to the Legal & Compliance department.

Access to government-classified information requires specific clearances, relative to the level of sensitivity. Any exchange or transmission of classified information or material must comply strictly with the relevant security process. Any actual or suspected incident or misuse must be immediately reported to Airbus' Security department.

# Trading Securities

We are encouraged to invest in Airbus shares. As a guiding principle, we may freely transact in Airbus shares as long as we comply with applicable laws and regulations and Airbus' internal rules.

Many countries have enacted insider trading laws. In line with these laws, we may not buy or sell the stock of any company while in possession of inside or privileged information about that company. This rule applies to the stock of Airbus, as well as to the stock of our customers, suppliers and partners listed on a public stock exchange.

In addition, we may not disclose any inside or privileged information to anyone, including co-workers, family members and friends, as they could illegally buy or sell shares or other securities based on the inside or privileged information.

## What is inside or privileged information?

Any information concerning Airbus itself, or an Airbus customer, supplier or partner, that is precise, non-public and price sensitive (i.e., likely to have a significant effect on the price of that company's stock if it were made public).

### **Key Airbus Documents to Reference:**

- *Disclosure Guidelines*
- *Insider Trading Rules*

# Managing Internal and External Communication

Airbus' brand and reputation are highly valuable assets. It is crucial that we promote and protect our brand to maintain strength, clarity and coherence. In addition, we must provide accurate information to the public regarding our business. The disclosure of certain kinds of information is highly regulated. Therefore, only designated persons may respond to formal outside requests for information. All public statements about Airbus must be approved by appropriate persons within Airbus.

All media enquiries should be sent to the Communications department. No information should be provided to the media without prior approval and guidance from the relevant department.

Airbus employees must not provide information, or engage in social media activities, on behalf of Airbus. Airbus' social media engagement is managed by the Communications department.

In addition, all content in published material, including brochures, advertising and all editorial support should be truthful and not disparage any competitors' products, services or employees.

Airbus sponsorships serve to build and secure relationships between Airbus and its constituencies by contributing to a range of carefully selected events, activities, conferences, foundations, institutions, etc. They may relate to social, cultural, sport or educational issues or they may be general in nature. They must always be transparent and accurately recorded in Airbus' books and records.

## **Key Airbus Documents to Reference:**

- *Airbus Brand Directive*
- *Golden Rules for Communications*
- *Social Media Guidelines*
- *Internal Editorial Rules*
- *Sponsorship, Donations & Memberships Directive*

# 3. Engaging in Proper Business Practices

Integrity, honesty and transparency should guide each of us in our business activities. We are expected to deal with customers, suppliers and other business partners in Airbus' interests and in compliance with laws and regulations.

## Zero Tolerance of Corruption

No Airbus employee may engage in any kind of corruption, whether public or private, active or passive nor in any influence peddling.

We may never offer, attempt to offer, authorise or promise any sort of bribe, facilitation payment or kickback to a public official or private party for the purpose of obtaining or retaining business or an improper advantage. Likewise, we must never solicit or accept a bribe or kickback from a public official or private party.

In addition, we must never hire someone else to do anything that we cannot ethically or legally do ourselves. This includes but is not limited to Airbus' business partners, suppliers, lobbyists, service providers and other such third parties - all of whom are expected to respect the prohibition against corruption.

Our anti-corruption policies therefore apply to the engagement of third parties, as well as the entry into partnerships, joint ventures or other M&A transactions.

## What is bribery?

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 secure some other improper advantage.

Bribery can be active or passive. We speak of active bribery for the 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. We speak of passive bribery for the 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.

### Examples:

**You are meeting a representative of a state-owned airline who requests an internship for his son.**

#### **How should you react to this request?**

Handle this request with caution, as an internship offer may constitute something of value. 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 HR channels, based on the intern's background, which should match Airbus' needs.

**In order to maintain a good business relationship with a client, you would like to give him or her a box of chocolates for New Year. Is this acceptable?**

Yes, provided the required local approval has been obtained. In this case, it is a courtesy gift of low value, during a period where gifts of this nature are traditionally exchanged.

**You are organising a training session for some client representatives located abroad. The Head of the delegation is asking you to organise a weekend of leisure in a luxury hotel in Provence, after the training session. What do you do?**

You should politely refuse this request, as accepting it could compromise your integrity and independence and Airbus' reputation, due to the primarily recreational nature of the request and its excessive cost which is

against Airbus policy. You may however provide some logistics support, for example booking the hotel for the client's representative if he or she does not speak the country's language.

## What is influence peddling?

Influence peddling is a form of bribery under most international anti-corruption laws. 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.

### Example:

**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 do you do?**

Handle this request with caution. The payment of a sum of money to a person so that the latter will abuse his or her influence with government in order to obtain a favourable decision is influence peddling. That may not be what the proposed consultant in this example intended to imply or actually do. It is therefore necessary to contact the Airbus Legal & Compliance department for further guidance in this situation.

## Who is a public official?

Often referred to as a "Government Official", Public Officials include but are not limited to:

- any elected or appointed government official or representative (e.g., a member of a ministry of transportation or defence) or a member of a ruling family;
- an employee, official, contractor, consultant or representative of a government or any department, agency or instrumentality (e.g., parastatal or state-owned enterprises);

- an employee, official, contractor, consultant or representative of state-owned airlines;
- any employee or person acting for or on behalf of a public official, government agency, or any enterprise that performs a governmental function (e.g., a licensing official or a tax agent, local and municipal officials);
- any political party, officer, employee or person acting for or on behalf of a political party or candidate for public office;
- a person in the service of a government, including members of the military, coast guard, space agency, police, or civil service;
- an employee or person acting for or on behalf of a public international organisation, (e.g., United Nations, International Monetary Fund, World Bank, etc.);
- family members and close relatives of any of the above (e.g., a parent, spouse, child, brother or sister, including any of these through marriage).

## What are facilitation payments?

Small unofficial payments to low-level public officials to speed up or obtain routine administrative processes. Consistent with most anti-corruption laws, Airbus prohibits the making of such payments.

### Example:

**In view of some overseas travel for Airbus, you must get an emergency visa in order to travel within two weeks. At the embassy, you are told by a public official that obtaining the visa will take a minimum of one month, but offers to speed up the procedure in exchange for a ticket of 20 euros. How do you react to this proposal?**

In accordance with the Standards of Business Conduct, Airbus prohibits any form of facilitation payments. Therefore, explain to the public officer that Airbus refuses this type of arrangement, regardless of the amount of the commission requested, and that you will inform your hierarchy of the risk of delay.

### Key Airbus Documents to Reference:

- *Anti-Corruption Policy*
- *Business Development Support Initiative (BDSI) and related Directives*

## Gifts and Hospitality

Business courtesies, such as gifts and hospitality, given to or received from customers, suppliers and other partners are commonly used to build goodwill and acknowledge appreciation in business relationships. However, these courtesies must reflect a normal business custom and may not influence, or give the appearance of influencing, any business decision.

Good judgment should always guide us in these situations. Business courtesies are prohibited by law under certain circumstances and in certain countries. We must each follow the policies that apply to us. Gifts of cash or cash equivalents, such as gift certificates and vouchers, are never permitted.

In the interest of full transparency and to facilitate possible audits or reviews, any giving or receiving of gifts or hospitality must be fully and accurately recorded.

**Key Airbus Document to Reference:**

- *Gift and Hospitality Directive*

## Identifying and Managing Conflicts of Interest

As part of our efforts to protect Airbus' reputation and ensure we are acting on the basis of what is best for Airbus, we must avoid both actual and apparent conflicts of interest at all times, and if we cannot avoid a conflict of interest, we must make it known to our supervisor.

In particular, when hiring current and former public officials or government employees, we should comply with all applicable laws, regulations and directives, including those dealing with conflicts of interest. These rules extend to negotiations or contracts with government employees relating to

potential employment by Airbus either on the payroll or as consultants or subcontractors.

### **What is a conflict of interest?**

A conflict of interest arises when our personal interests interfere, or appear to interfere, with our ability to perform our jobs without bias in Airbus' best interest. For example, a conflict might arise when an employee, family members, near relatives or personal friends have a significant undisclosed financial interest in a customer, supplier, partner or competitor of Airbus

## **Anti-Money Laundering**

Airbus is committed to complying with all applicable anti-money laundering laws. Accordingly, Airbus seeks to conduct business only with reputable customers who are involved in legitimate business activities, and whose funds are, to our knowledge, derived from legitimate sources

**Key Airbus Document to Reference:**

- *Anti- Money Laundering Policy*

## **Competing Fairly**

We believe in fair competition and must strictly comply with applicable competition laws (so-called "antitrust rules") in the countries where we do business. These laws forbid agreements or behaviour that may restrain or alter competition or trade.

The exchange or disclosure of commercially sensitive information relating to competitors, customers or suppliers may also violate applicable competition laws.

**Key Airbus Document to Reference:**

- *Antitrust Policy*

## Complying with Export Laws

As a global company, we purchase goods and services from a diverse, multinational group of suppliers. We also provide goods and services to customers all over the world. It is therefore critical that we carefully comply with all applicable regulations that govern our import and export activities.

This is a complex legal and regulatory environment. The Export Compliance organisation can answer any questions regarding the import or export of goods, services or information.

### What is an “Export”?

In each of the Airbus home countries, an export occurs when goods, technologies or software are transferred to another country. It is irrelevant whether the transport is carried out via email, by parcel service or hand-carried by an Airbus employee.

Also the upload of technical data or software to a server is considered as export, if persons in other countries have the possibility of access.

Under US laws, an export occurs when goods, technology or services are transferred to a foreign person or company wherever they are located (e.g., in the US or overseas).

### What is import activity?

Bringing the goods that Airbus purchases from a foreign or external source into another country.

#### **Key Airbus Documents to Reference:**

- *Export Compliance Directive*
- *Business with Sanctioned Countries Directive*
- *Export Compliance Procurement Directive*

## **Cooperating with Authorities**

We are expected to cooperate with legitimate authorities. Any request from a public official that relates to an investigation or inquiry must be coordinated with the Legal & Compliance department.

## **Treating Suppliers Fairly**

Suppliers deliver a high proportion of the value of Airbus' products, and thus play an important role in customer satisfaction. We are committed to sustaining fair relationships with suppliers.

The Procurement function is responsible for ensuring that all supplier relationships are handled in an equitable and compliant manner. We each have a duty to make certain that issues with suppliers are professionally dealt with at all times, and that our selection of suppliers is based solely on what is best for Airbus.

## **Our Commitment to Product Safety and Quality**

Product quality and safety for the customer is part of our identity and is a core Airbus value. We should never sacrifice product quality or safety.

To fulfil our commitment to quality, we must comply with all quality control standards that govern our responsibilities. These include all applicable laws and regulations, as well as internal control procedures designed to promote the manufacture of safe, high quality goods.

Product safety does not stop once the product is delivered. Maintaining high standards of product safety is in our interest as well as the interest of our customers, their customers, and the global aerospace industry. Product safety depends heavily on information feedback, and every employee

is expected to immediately report any concerns regarding safety.

We are committed to ensuring that our products are designed, manufactured, delivered and supported in accordance with the highest security standards while being compliant with all applicable laws and regulations.

Quality excellence is our overriding priority, including safety. We should each have a clear understanding of our role and responsibility with respect to quality during the entire product lifecycle. We are expected to alert, stop, and fix any issue.

# 4. Being a Good Corporate Citizen

Airbus is a leading global company pioneering the future of aerospace. We acknowledge our responsibilities towards the local communities in which we operate, and strive to make valuable contributions to the economic, social and educational well-being of these communities.

## Establishing Ethical Business Standards Globally

Airbus is a founding member of the International Forum on Business Ethics Conduct (IFBEC). The IFBEC is an organisation of aerospace and defence companies whose mission is to foster and promote global, industry-wide commitment to high ethical standards through adoption of the Global Principles and sharing of sound business practices. By signing the Global Principles, Airbus demonstrated its commitment to developing processes and policies that foster ethics and compliance in its corporate business practices.

Airbus is also a signatory of the United Nations Global Compact, which encourages businesses to adopt responsible practices and report on their progress.

### What is the United Nations Global Compact?

The Global Compact is a United Nations policy initiative for businesses that are committed to aligning their operations and strategies with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption.

## What are the Global Principles?

The IFBEC Global Principles of Business Ethics for the Aerospace and Defense Industry affirm our industry's commitment to ethical business behaviour and to a uniform set of standards. The Global Principles address business conduct as it relates to zero tolerance of corruption, use of advisors, management of conflicts of interest and respect for proprietary information.

## Conducting Responsible Sourcing

By engaging in responsible sourcing, we aim to achieve long-term relationships with best-in-class suppliers who embrace the highest integrity standards.

We expect our supplier base to understand, share and adhere to our business ethics standards via our Supplier of Conduct. Suppliers may be asked to provide evidence of the application of these principles as appropriate, in particular in the areas of business ethics, anti-corruption, human rights, labour standards and environmental sustainability.

### **Key Airbus Document to Reference:**

- *Supplier Code of Conduct*

## Supporting Our Communities

We are committed to improving the quality of life in the communities where we live and work. We do so through local and sustainable business development, improvement to infrastructures, technology acquisition, employment and training. These initiatives must be reviewed and approved by the appropriate management.

Corporate donations to public-interest or private organisations may be permitted if not limited or forbidden by local law. Together with political contributions, they must always be reviewed and

approved according to the relevant internal policies and applicable laws and regulations.

**Key Airbus Documents to Reference:**

- *Sponsorship, Donations & Memberships Directive*

## Striving for Eco-Efficiency

We acknowledge that we have a responsibility to our global community to protect the environment. We therefore aspire to become an eco-efficient enterprise. We must promote eco-efficiency in all of our business activities by striving to reduce the overall Airbus carbon- and global environmental footprint. In addition, we must comply with and strive to exceed all applicable environmental laws and regulations wherever we do business.

### What is eco-efficiency?

Eco-efficiency aims at maximising the benefits of the products and services we provide to our customers and other stakeholders, while minimising the environmental impact of these products throughout their life cycle.

**Key Airbus Document to Reference:**

- *Environmental Policy*

# What to do when you have a concern

Our Integrity Principles and Standards are applicable to all employees regardless of employment positions or geographical locations. These are the cornerstone of the Airbus Ethics & Compliance Programme and define the values, policies and expectations for the day-to-day conduct of our business.

Because the right answer is not always obvious, all employees are strongly encouraged to openly communicate and to clarify their questions or concerns. It is equally important that all managers build a positive working environment and that they encourage their employees to openly communicate.

Employees can approach any Ethics & Compliance representative to clarify an ethical issue. A list of Ethics & Compliance representatives can be found on the Ethics & Compliance corner of the HUB.

All employees are strongly encouraged to report their concerns through the normal business channels, such as your manager, your Human Resources Business Partner (HRBP), or your Ethics & Compliance representative

## OpenLine

OpenLine is also available for use by all employees. It is operated by an external provider. The use of OpenLine is entirely voluntary, and conditions for use are available on the HUB portal and communicated broadly within Airbus. An inquiry or concern can be submitted confidentially without fear of retaliation.

All reports will be investigated promptly and thoroughly, in accordance with applicable laws and Airbus policies. Feedback on results of the

investigation of a concern will be provided in a timely manner.

Employees can contact the OpenLine at [www.airbusgroupopenline.com](http://www.airbusgroupopenline.com)

Airbus will not tolerate retaliation against employees making reports in good faith and/or assisting in investigations of suspected violations of the Standards. Good faith means submitting a concern without malice and without consideration of personal benefit, and with plausible reason to believe it to be true.

**Key Airbus Documents to Reference:**

- *OpenLine Policy*
- *Policy for Compliance Allegation Investigation*

## **Airbus Ethics & Compliance Office**

For questions or suggestions, you may contact the Airbus Ethics & Compliance Office:

E-mail: [compliance@airbus.com](mailto:compliance@airbus.com)

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

- Accuracy of Records - 2, 10, 13, 16
- Antitrust - 17
- Asking Questions - 5, 7, 11, 18, 24, 25
- Assets - 9, 13
- Bribery - 14
- Business Ethics - 21, 22
- Citizenship - 3, 21
- Communities - 3, 21, 22, 23
- Conflicts of Interest - 16, 22
- Corruption - 3, 14, 15, 21, 22
- Customers - 8, 11, 12, 14, 16, 17, 18, 19, 23
- Disclosure - 11, 12, 13, 17
- Discrimination - 7
- Diversity - 6, 7
- Donation - 14, 22, 23
- Eco-Efficiency - 23
- Environment - 3, 22, 23
- Export/Import Control - 18
- Facilitation Payment - 15
- Gifts - 3, 16
- Government - 10, 11, 15, 16
- Health & Safety - 2, 8
- Hospitality - 3, 16
- Innovation - 1, 2, 3, 6
- Intellectual Property - 9, 10
- Media - 13
- Non-retaliation - 3, 7, 24, 25
- OpenLine - 3, 5, 24, 25
- Personal Data - 8
- Privacy - 8
- Procurement - 18, 19
- Proprietary Information - 9, 10, 11, 22
- Protecting Company Assets - 9
- Protecting Information - 9, 10, 11
- Quality - 1, 2, 19, 20, 22
- Records - 2, 10, 11, 13
- Safety - 2, 8, 19, 20
- Security - 8, 9, 10, 11, 20
- Shareholders - 10
- Social Media - 13
- Suppliers - 5, 8, 11, 12, 14, 16, 17, 18, 19, 22
- Workplace - 2, 6, 7, 8

The Standards of Business Conduct are available online at [www.airbusgroup.com](http://www.airbusgroup.com). The Standards of Business Conduct and the policies they refer to are also available on the Hub. Visit the Legal & Compliance Community [<https://hub.intra.corp/sites/Compliance/Pages/default.aspx>] and find more information on:

- Ethics & Compliance resources
- Procedures and guidelines
- How to contact OpenLine
- Questions and answers and learning aids

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# Products with Integrity from People with Integrity.

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