

# Airbus Responsible Lobbying Charter



# Airbus responsible lobbying charter

**Airbus is an international pioneer in the aerospace industry. We are a leader in designing, manufacturing and delivering aerospace products, services and solutions to customers on a global scale. We pioneer sustainable aerospace for a safe and united world.**

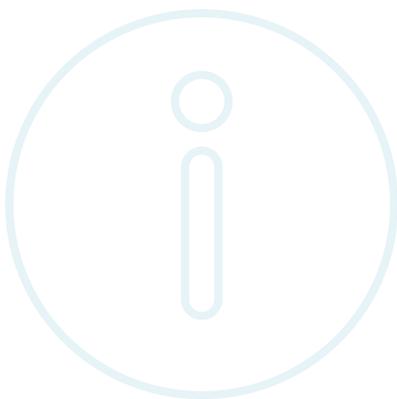
**Airbus aims to conduct business ethically and responsibly, based on Airbus values and in compliance with all applicable laws and regulations, supported by the Airbus Code of Conduct and Anti-Corruption Policy.**

## Purpose and Scope:

The purpose of this Charter is to:

- set out a framework for lobbying activities; and
- maintain a consistent and responsible approach to lobbying activities across Airbus.

This Charter is applicable across Airbus' global operations, including all employees in each division, as well as those in its subsidiaries and affiliates where Airbus owns a majority share and /or voting rights, who are responsible for conducting lobbying activities on behalf of the company. It also applies to any third party engaged to conduct lobbying activities on Airbus' behalf. Rules similar to those provided in this Charter should be promoted in companies where Airbus owns 50% or less of the shares and/or voting rights.



## References and links

**The following Airbus documents are referenced within this Charter:**

- Airbus Code of Conduct
- Airbus Anti-Corruption Policy
- Airbus Directive on Requirements for Gifts & Hospitality
- Airbus Directive on Requirements for Sponsorships, Donations and Corporate Memberships
- Airbus Directive on Requirements for the Prevention of Corruption in the Engagement of Lobbyists and Special Advisors
- Airbus Directive on Requirements for the Prevention and Declaration of Conflicts of Interest

For further information: please see the **Ethics & Compliance** page on [www.airbus.com](http://www.airbus.com)

**Local restrictions may apply**



# Airbus approach to responsible lobbying:

**Lobbying refers to any action by an individual or company toward a government or administration representative, legislator or members of regulatory agencies or policy-making bodies aimed at informing proposed legislation or a public decision.**

Lobbying may therefore be used to promote or defend Airbus' interests and provide decision-makers with technical or other expertise on the consequences and practical scope of existing or proposed legislation or public decisions.

Airbus endeavours to maintain healthy, transparent relationships with governments and legislators by communicating its views and concerns to elected officials and policy makers.

Lobbying activities are channelled through the Executive Management and Public Affairs teams and may be undertaken by Airbus employees or by professional third party representatives engaged to lobby on Airbus' behalf (collectively referred to as 'Airbus representatives' within this Charter).

In doing so, Airbus representatives must always conduct business with the **highest integrity standards** and always compliant with all applicable laws and regulations, as well as Airbus' own internal policies and standards, including those referenced in this Charter.

It is understood that lobbying activities can, in certain situations, represent significant risks including bribery and corruption. Airbus is therefore committed to conducting business ethically and maintains a **zero tolerance policy** towards corruption of any kind, whether public or private, active or passive. Similarly, Airbus prohibits influence-peddling.

Airbus representatives are prohibited from offering, paying, or accepting bribes or kickbacks for any purpose, either directly or through a third party, nor will Airbus representatives make facilitation payments or permit others to make them on Airbus' behalf.

**In addition, particular attention must be paid to the following key areas when engaging in lobbying activities:**

## Conflicts of interest:

Airbus employees must be familiar with and act in accordance with the Airbus Directive on **Requirements for the Prevention and Declaration of Conflicts of Interest**, and disclose any existing or potential conflicts of interest, in particular when it comes to lobbying activities.

When considering the recruitment of candidates with prior professional experience in the public sector, Airbus will evaluate, in accordance with relevant legislation, the level of risk induced by such recruitment, including any conflict of interest, and take appropriate measures if necessary. This analysis of risk of any conflict of interest will also apply to secondments in both directions.

Whilst Airbus supports the democratic process and the rights of the individual wishing to undertake public duties, such as serving as a local councillor, employees should again **make a declaration** if they find themselves in a situation of actual or potential conflict of interest in accordance with the **Airbus Directive on Requirements for the Prevention and Declaration of Conflicts of Interest**

## Third Parties:

Any Airbus employee who wishes to retain a third party to engage in lobbying activities must ensure that a compliance due diligence check is performed as set forth in the **Airbus Directive on Requirements for the Prevention of Corruption in the Engagement of Lobbyists and Special Advisors**.

No third party may be engaged unless and until the due diligence process is satisfactorily completed. Third party lobbyists will be paid only upon receipt of detailed activity reports including accurate and factual information about the activities carried out. They must also participate in training organised by the Airbus Ethics & Compliance team.

## Visits, Gifts and Hospitality:

Visits by politicians to Airbus offices or sites, whether requested or otherwise arranged, must be considered, arranged and recorded by the Public Affairs Department. Airbus seeks to avoid hosting visits during campaigning periods for any local, state or national election or referendum.

Whether in connection with such visits or otherwise, Airbus employees must ensure, before offering any gift or hospitality to a government or public official, that the value is reasonable and in line with the **Airbus Directive on Requirements for Gifts & Hospitality**, as well as any laws and regulations that may apply (including to the public official).

Depending on the value, Airbus employees must obtain prior approval and record any gifts or hospitality, whether given or received, on Airbus' dedicated on-line register.



## Political Contributions:

Airbus will adhere to all applicable laws and regulations governing political contributions. Where contributions are allowed by relevant laws, in accordance with the **Airbus Directive on Requirements for Sponsorships, Donations and Corporate Memberships**, Airbus will only make political contributions, financial or in-kind, where they support a genuine democratic process and to political parties which share the Airbus global values of inclusion, diversity and integrity. Airbus employees engaged in lobbying activities on behalf of Airbus must obtain prior approval and record any political contributions in accordance with the **Airbus Sponsorships, Donations and Corporate Membership Policy**.

## Transparency:

People engaged in lobbying activities on behalf of Airbus, whether employees or third party representatives, must disclose their identity and their relationship to Airbus to the governmental institutions and organisations with which they engage. This includes, for example, disclosure of their registration number to the competent authority where appropriate. Where relevant, Airbus representatives must identify whether they represent the company, trade or other form of association.

In addition, Airbus representatives must ensure that all legally required information is provided as mandated by applicable laws, rules and regulations (eg, nature of representation actions, identity of people in charge of representation actions, principal professional associations to which they belong, associated costs, etc).

Some countries may have specific requirements related to lobbying, including associated reporting obligations, such as, but not limited to France, the UK, the European Union and USA. Law and policy making, being a very dynamic process, means that rules and regulations may evolve quickly over time. Therefore, those involved in, or considering lobbying activities, must in the first instance contact their local Airbus Public Affairs team.

## Personal Data:

Personal data relating to public officials (such as political or trade union representatives, public figures, company representatives) or any other person Airbus representatives are in contact with, in the context of Airbus lobbying activities, are to be collected and processed in accordance with applicable personal data protection laws and regulations.

## Raising Concerns:

Airbus employees are encouraged to raise any concerns with their line manager or an Ethics & Compliance, Legal or HR representative.

In addition, the **Airbus OpenLine** ([www.airbusopenline.com](http://www.airbusopenline.com)) provides a confidential, secure and easy way to report concerns such as bribery and corruption. Airbus will not tolerate retaliation against an employee who raises concerns in good faith, and is committed to protecting confidentiality and personal data.



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