

This Statement has been published in accordance with the UK's '**Modern Slavery Act 2015**' and the Australian '**Modern Slavery Act 2018 (Cth)**'.

It sets out the steps taken by Airbus SE during the financial year ending 31 December 2020 to prevent modern slavery and human trafficking in its business, operations and supply chain and the proposed actions to support this going forward.

# Airbus SE Modern Slavery Statement

Year Ending  
31 December, 2020

Contents:	page
Our approach and progress to date	1
Our structure, operations and supply chains	2
Our governance and policies on modern slavery	5
Risk assessment and mitigation	7
Effectiveness in tackling modern slavery	10
Training and capacity building	11
Future outlook	11
Other relevant information	12

## Our approach and progress to date

**Modern slavery, including servitude, forced labour and human trafficking is a global issue that can affect every country, sector and industry. It represents some of the gravest forms of human rights abuse in society.**

**Airbus SE (together with its subsidiaries, "the Company") has prepared this Statement in compliance with the UK 'Modern Slavery Act 2015' and the Australian 'Modern Slavery Act 2018 (Cth)' (together "the Acts"). This Statement specifically covers the following UK and Australian operations\* and subsidiaries, each being required to report under one or both of the Acts: Airbus Operations Ltd, Airbus Defence and Space Ltd, Airbus Helicopters UK Ltd and Airbus Australia Pacific Ltd and their subsidiaries.**

As a signatory to the United Nations Global Compact since 2003, the Company is committed to upholding international human rights principles and standards, including the International Bill of Human Rights, the International Labour Organization's Declaration ("ILO") on Fundamental Principles and Rights at Work and its Core Labour Standards. In doing so, the Company is implementing policies and processes that meet the requirements of the United Nations Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

'Respect human rights' was prioritised by the Company as one of the four sustainability commitments agreed by the Airbus Executive Committee and the Ethics, Compliance and Sustainability Committee of the Airbus SE Board of Directors ("ECSC") during 2020. This also included agreement of an ambition for human rights: 'to embed and advance human rights throughout our business, operations and supply chain'.

Actions towards assessing and addressing modern slavery risks to our business, operations and supply chain continued during 2020 and are described in this Statement.



\* Airbus Australia Pacific Ltd (ACN 003 035 470); Airbus Operations Ltd (03468788); Airbus Defence and Space Ltd (02449259); Airbus Helicopters UK Ltd (01164090)

# Our Structure, Business and Supply Chains

## Structure and Business:

The Company has organised its businesses into three operating segments: (i) Airbus, (ii) Helicopters and (iii) Defence and Space. With consolidated revenues of €49.9 billion in 2020, the Company is a global leader in aeronautics, space and related services.

Airbus offers the most comprehensive range of passenger airliners. The Company is also a European leader, providing tanker, combat, transport and mission aircraft, as well as one of the world's leading space companies. In helicopters, the Company provides the most efficient civil and military rotorcraft solutions worldwide. In 2020, it generated approximately 79% of its total revenues in the civil sector (compared to 86% in 2019) and 21% in the defence sector (compared to 14% in 2019).

The Company's corporate governance ensures that Airbus SE is managed according to its regulating laws and Articles of Association, and evolves in order to match its growth ambitions, meet its obligations and reach the goals it has set itself.

The Company's top-level governing body is the Board of Directors which consists of a maximum of 12 members. Under the Articles of Association, the Board of Directors is responsible for the overall conduct, management, direction and performance of the Company and its business.

The Board of Directors delegates the day-to-day management to the Chief Executive Officer ("CEO") who fulfils this task with the support of the Executive Committee.

The industrial flow is secured by Quality and enabled by Procurement as well as four transverse functions responsible for providing the skills, standards and services necessary for smooth industrial planning, logistics and transport, integrated manufacturing engineering, eradication of non-quality, and highest operational excellence and sound performance management.

For purposes of the Australian Modern Slavery Act 2018 (Cth), Airbus Australia Pacific Ltd is a wholly owned subsidiary of Airbus Helicopters which is, in turn, a part of Airbus SE. Headquartered in Brisbane, Queensland, Airbus Australia Pacific Ltd's business in Australia and New Zealand is conducted at 23 sites. Eleven of these locations are Australian and New Zealand Defence establishments where Airbus aircraft are either operated or managed. Airbus Australia Pacific Ltd's primary customer base is the Commonwealth of Australia (with the end user being the Australian Defence Force) and the New Zealand Crown (with the end user being the New Zealand Defence Force). Airbus Australia Pacific Ltd's supply chain consists of two main streams, aeronautical and non-aeronautical procurement. With over 1,500 approved suppliers, 85% of Airbus Australia Pacific Ltd's suppliers are Australian or New Zealand based, with the remainder predominantly European based.

## Workforce:

As of 31 December 2020, the Company's workforce amounted to 131,349 employees, a decrease compared to 2019 (134,931), 95.58% of which consisted of full-time employees. These statistics take into account consolidation effects and perimeter changes throughout 2020. Depending on country and hierarchy level, the average working time is between 35 and 40 hours per week.

In terms of nationalities, 35.7% of the Company's employees are from France, 32.3% from Germany, 7.7% from the UK and 9.8% from Spain. US nationals account for 2.1% of employees. The remaining 12.4% are employees coming from a total of 134 other countries. In total, 89.9% of the Company's active workforce is located in Europe on more than 100 sites. Furthermore, the Company expects its workforce to evolve naturally to support the business.

# Airbus



**131,349**  
employees



**95.58%**  
are full-time  
employees



Airbus operates  
in **170**  
locations  
worldwide



**89.9%**  
of workforce  
is located in  
Europe on more  
than 100 sites



**23,000**  
suppliers



Suppliers in  
more than  
**100**  
countries



## Airbus Affiliates:

All affiliates of the Company (affiliates where Airbus owns more than one half of the voting rights, or is able to appoint or discharge more than one half of the members of the board) with operational activities are expected to deploy similar internal policies applying the Company's directives.

A corporate directive assists the Company's affiliates in effectively fulfilling their responsibilities while assuring Airbus' ongoing commitment to high standards of corporate governance.

In 2020, the Company, working closely with its two Divisions, approved an update of the company-wide single directive on corporate governance for the Company's affiliates, which defines rules, processes and procedures applicable to the Company's affiliates and their respective boards, directors and officers. The Company leveraged this in-depth work to integrate enhanced requirements on labour and human rights, environment, health and safety and procurement matters into the new directive on the basis of Company related internal policies including:

- International Framework Agreement ("IFA");
- Agreement on the European Works Council;
- Supplier Code of Conduct;
- Health & Safety Policy;
- The Company's Code of Conduct;
- Environmental Policy;
- The Company's Anti-Corruption Policy and related Directives.

Since September 2018, this directive has become a reference for all affiliates from all Divisions, and the Company is working on a regular yearly update to constantly improve it. Based on the updated directive, a newly harmonised questionnaire was sent to all controlled affiliates in 2020 to self-assess their internal controls, including how they relate to the environment, health & safety, human resources and procurement compliance requirements. Regarding the above activities, controlled affiliates were asked to confirm that all relevant Company policies were accessible to their employees and duly communicated to them. If that is not the case, controlled affiliates shall take appropriate actions to remediate the gaps.

To verify that the answers provided to the questionnaire are in line with the Company's expectations, so-called "Fit" checks started to be performed in 2018 on some Finance, Compliance and Governance key controls for controlled affiliates of the Company and its two Divisions. From 20 Fit checks performed in 2018, the Company increased to 70 in 2019 and reached 75 Fit checks in 2020 despite the COVID-19 crisis. 85 Fit checks are targeted in 2021.

Since 2019, affiliates are also asked to regularly evaluate risks via the Company's Enterprise Risk Management ("ERM") system, as well as to regularly monitor them as part of their risk assessment process. The Company endeavours to ensure that the procedures to assess, investigate and manage allegations are well aligned throughout the Company.

In 2020, the internal controls process has been reinforced and the coverage extended to jointly controlled and non-controlled affiliates to mainly ensure the proper application of relevant compliance and sustainability policies.

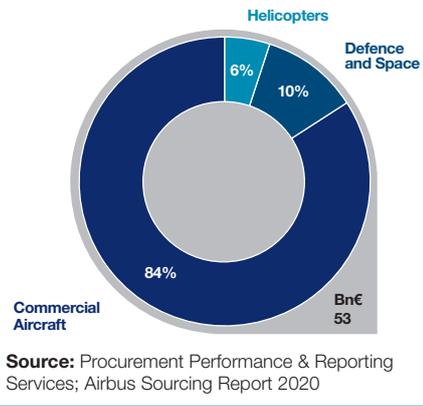
Each affiliate with operational activities has in place a Board of Directors and/or a shareholders' meeting where strategic decisions are made. Each affiliate has an Airbus supervisor who is a member or Chairman of the Board who ensures that all the Company's requirements are considered by the affiliate's management.

For its principal and operational minority joint ventures, the Company will work with the joint-venture partners to ensure the proper application of relevant compliance and sustainability policies.

Aligned with the Australian Modern Slavery Act 2018 (Cth), during 2020 the Company held regular dialogue with its subsidiaries and operations, including Airbus Australia Pacific Ltd and its subsidiaries, on areas of risk related to modern slavery and forced labour.



**Fig 1. Overall external sourcing volume of the Company, 2019**



### Supply Chain:

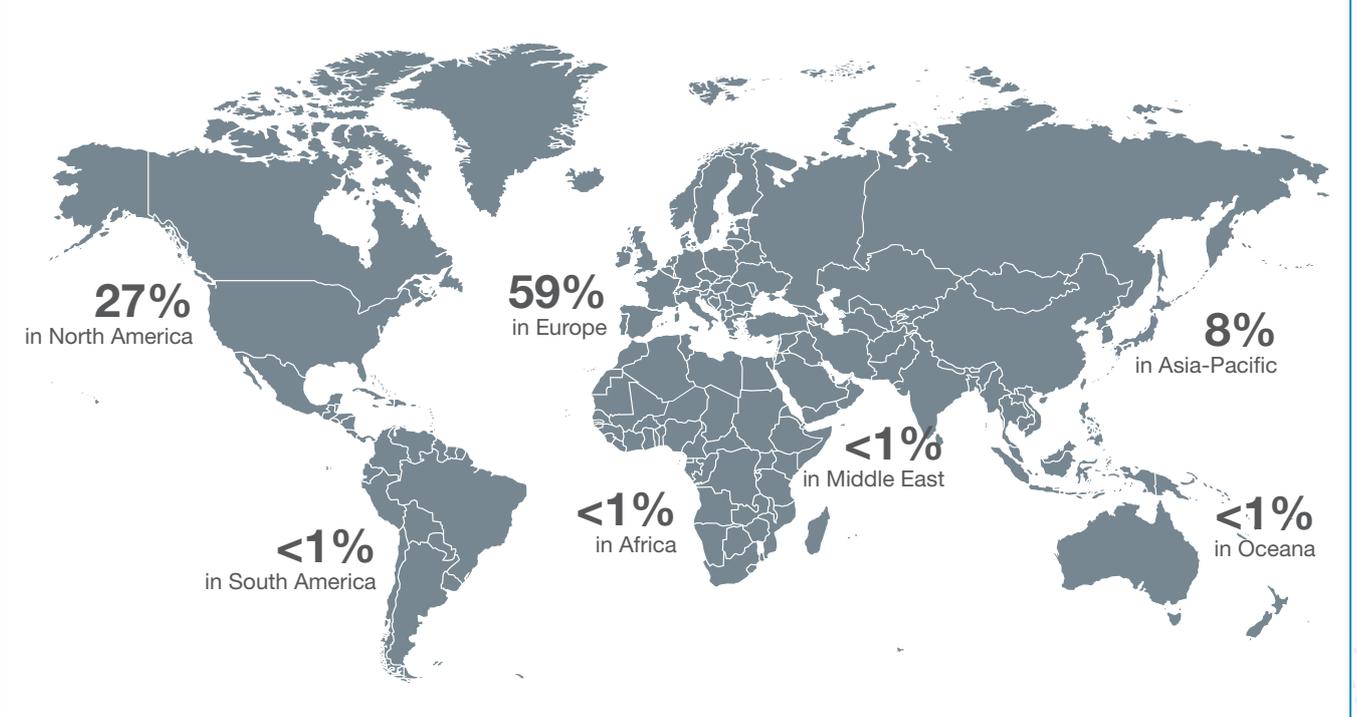
At the end of 2020, approximately 23,000 suppliers from more than 100 countries supply parts, components, systems and services to the Company. In 2019, the overall external sourcing volume of the Company was valued at around €53 billion and shared between Divisions with 84% for the Company’s commercial aircraft business, 10% for the Company’s defence and space Division and 6% for the Company’s helicopters Division.

Whilst the Company’s products and services are sold all over the world, the majority of its supply chain is based in Europe and OECD countries. However, in the past few years, the supply chain has become concentrated and more international. The Company has identified local sourcing in Asia as one of its leading long-term objectives. In addition, and due to increasing consolidation within the aerospace and defence sector, larger work packages are being placed with a smaller number of lead suppliers.

To promote further globalisation of its sourcing footprint, the Company has established regional sourcing offices in North America, China & East Asia and India.

For the sourcing of indirect goods and services, the Airbus General Procurement function is represented in the regional sourcing offices. Throughout China, India and North America, Airbus General Procurement has over 50 employees managing “local for local” activities across 18 sites. Airbus General Procurement continued to grow the global footprint by implementing new developments within Asia Pacific (Singapore and Malaysia) and the Middle East throughout 2020.

**Fig 2. The Company’s global sourcing footprint is represented as follows based on Tier1 and sub-tiers data:**



# Our governance and policies on modern slavery

## Governance:

2020 was a year when the Company strengthened its governance around sustainability. The former Ethics & Compliance Committee of the Board of Directors was expanded to include sustainability as a whole, with the first meeting of the ECSC taking place in October 2020.

The ECSC is responsible for assisting the Board of Directors to oversee the Company's:

- culture and commitment to ethical business, integrity and sustainability;
- ethics and compliance programme, organisation and framework for the effective governance of ethics and compliance, including all associated internal policies, procedures and controls; and
- sustainability strategy and effective governance to ensure that sustainability-related topics are taken into account in the Company's strategy and objectives.

Under the Board Rules, the Board of Directors delegates the day-to-day management of the Company to the CEO, who, supported by the Executive Committee makes decisions with respect to the management of the Company, including sustainability. The Executive Committee has the responsibility to provide top level expectations and direction while overseeing and validating the sustainability strategy. This entails validating sustainability targets including those integrated into the Top Company Objectives.

During 2020 the Company formalised its governance arrangements for human rights. Accountability for human rights at Executive Committee level has been assigned to the Executive Vice-President ("EVP") Communication and Corporate Affairs. Starting October 2020, focused human rights updates will be provided to the Executive Committee, at a minimum of twice per year. In addition, regular updates on human rights will be provided to the ECSC at Board level. The Executive Committee will agree and guide the strategic direction of the Company's human rights ambition; agree and guide the prioritisation of initiatives and resource allocation for implementation; and review the status and effectiveness of actions in progress (including roadmap /targets /KPIs). The ECSC will make and support decisions on identified salient issues and emerging significant risks; make and support decisions on key trends/ legislation and provide feedback and steering as required.

In support of these new governance arrangements and to coordinate action on human rights, a new Human Rights Steering Committee, chaired by the Head of Sustainability and Environment, and Human Rights Multi-Functional Team ("Human Rights MFT"), led by an appointed lead for human rights, were created during 2020. The objectives of the Human Rights Steering Committee include providing strategic guidance to support decision making and prioritisation as well as providing guidance and support on progress, whilst the Human Rights MFT will ensure the development and delivery of the human rights roadmap, including actions against agreed targets and support awareness raising and capacity building. In addition, as part of the formalised governance arrangements on human rights, the topic will be presented annually at the Societa Europea Works Council ("SEWC") meeting comprising social partners from across the Company's European sites.

## Policies:

Building on the human rights commitments and expectations that have existed in various key documents for many years, including within the IFA signed in 2005, the Company's Code of Conduct and the Company's Supplier Code of Conduct, during 2020, the Company started work to map, consolidate, articulate and embed its commitments to human rights standards and principles, as well as its expectations in this respect, aligned to international human rights standards and principles including the United Nations Guiding Principles for Business and Human Rights, the ILO Core Conventions on Labour Standards and the OECD Guidelines for Multinational Enterprises. This work will continue in 2021.

## Airbus Code of Conduct:

The foundation for integrity at Airbus is the Code of Conduct which is intended to guide daily behaviour and help employees resolve the most common ethical and compliance issues that they may encounter. The Code of Conduct applies to all employees, officers and directors of the Company as well as entities that the Company controls. Third-party stakeholders with whom the Company engages are also expected to adhere to the Code of Conduct in the course of performing work on the Company's behalf.

**Airbus Code of Conduct is available [here](https://www.airbus.com/company/ethics-compliance.html).**

<https://www.airbus.com/company/ethics-compliance.html>



## International Framework Agreement:

In the IFA, the Company reaffirms its willingness to respect the regulation regarding fundamental human rights, equal opportunities, free choice of employment, as well as prohibition of child labour and respect and ensuring the conditions for social dialogue.

The Company in particular intends, via its agreements, to respect the disposition of the following ILO conventions: numbers 111 (discrimination – employee and occupation), 100 (equal remuneration), 135 (workers' representatives), 29 (forced labour), 105 (abolition of forced labour), 182 (child labour), 138 (minimum age), 87 (freedom of association and protection of the right to organise) and 98 (right to organise and collective bargaining).

The head of each business is responsible for ensuring compliance with these principles. The provisions of this framework agreement define the Company's standards to be applied wherever the Company operates, provided they are not in contravention of local law, insofar as more favourable conditions do not exist already. Dedicated processes ensure that the provisions of this agreement are not breached wherever the Company operates, insofar as more favourable conditions do not exist already.

## Airbus Supplier Code of Conduct:

The Company strives to make environmental and societal responsibility a core element of its procurement process, managing the relationships with suppliers through sourcing strategy, supplier selection, contract management, supplier monitoring and development.

The Company's suppliers must comply with all applicable laws and regulations. In addition, all business should be conducted by suppliers in compliance with the principles of the Company's Supplier Code of Conduct.

The Airbus Supplier Code of Conduct is the document of reference for Airbus' responsible supplier management.

**Supplier Code of Conduct** is available [here](https://www.airbus.com/be-an-airbus-supplier.html).

<https://www.airbus.com/be-an-airbus-supplier.html>

This Supplier Code of Conduct represents the group-wide values and principles in line with internationally recognised standards and conventions (such as OECD and ILO).

As a co-founder of the International Forum on Business Ethical Conduct (IFBEC), the Company is supporting the application of global standards for business ethics and compliance. IFBEC members have established a Model Supplier Code of Conduct which expresses the minimum ethical standards to be applied by suppliers throughout the aerospace and defence industries. It also encourages suppliers to go beyond legal compliance, drawing upon internationally recognised standards in order to advance in social and environmental responsibility and business ethics.

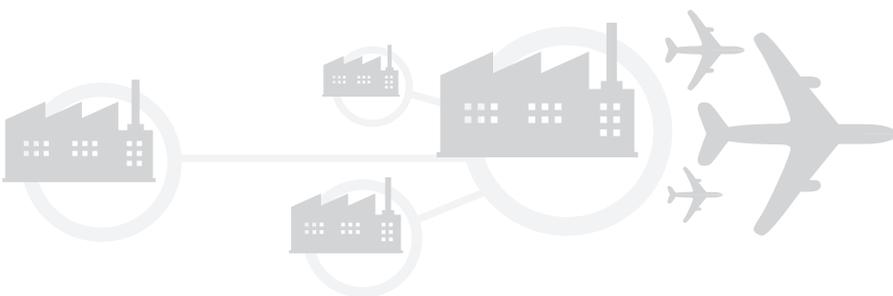
During 2020, the Company worked with IFBEC to update and strengthen the IFBEC Model Supplier Code of Conduct, which was re-issued in November 2020. The update included strengthened requirements around a number of topics including human rights, product safety and environment.

In addition, the Company added reinforced expectations into its own revised Supplier Code of Conduct, including:

- Product safety;
- Working hours and migrant workers aligned with ILO conventions;
- Environment, to specifically account for Airbus' environmental policies on substance management and product performance accounting for a life-cycle perspective;
- Strengthened communication on the Company's reporting mechanism, OpenLine.

All suppliers will now be asked to sign a confirmation of compliance with the principles of the revised Supplier Code of Conduct (or to confirm their own practices are aligned with the principles set out in this code), and to cascade these principles throughout their own supply chains. A target to reach 80% of the Airbus sourcing volume committing to apply its principles by 2022 was approved.

The Company is committed to support suppliers, where necessary, to improve their own human rights due diligence.



# Risk Assessment and Mitigation

## Responsible Mineral Policy:

The Company places great importance on the responsible sourcing of materials used in manufacturing. Some minerals including 3TG (tin, tungsten, tantalum and gold) are necessary for the proper functioning of components within its products. The Company largely does not directly import minerals, but these minerals are found in certain products the Company procures. In that context, the Company requires that all suppliers comply with applicable laws and regulations on conflict minerals, including 3TG.

In October 2019, the Company joined the Responsible Business Alliance's Responsible Mineral Initiative ("RMI"), in order to further enforce activities of responsible sourcing while applying industry standards for supplier due diligence and data management in accordance with the OECD framework.

To outline the Company's commitment to responsible business, the Responsible Mineral Policy was released in 2019 which details its engagement to improve safety and human rights conditions in the mineral supply chains.

**Responsible Mineral Policy** is available [here](https://www.airbus.com/company/sustainability/human-rights.html).

<https://www.airbus.com/company/sustainability/human-rights.html>

The Company is also monitoring developments from the European Commission on critical raw materials ("CRM") and is investigating the possibilities to take a deeper look at its related supply chain, through direct involvement and/or trade associations.

For the small portion of direct procurement of minerals in the Company's Defence and Space Division, the Company has established a dedicated Conflict Mineral Management System which describes the necessary activities needed to monitor potential future legal obligations linked to the upcoming EU Regulations on the importation of 3TG.

The Company has adopted internal policies and management tools to perform the assessment, monitoring, mitigation and reporting of risk and compliance allegations, which are embedded into the Company's culture and processes. At the Company, heads of programmes and functions, as well as managing directors of affiliates, supported by respective internal specialists, shall ensure proper deployment of the Company's policies, management of ERM in their fields or perimeters, as well as duly reporting issues to top management. The Company's approach is based on its existing strengths, namely a strong management process already established and adopted by employees, empowerment of specialists and an industry approach whenever possible.

With regard to risk management, the Company performed an in-depth review of its ERM system in 2017 in order to identify potential missing risks related to human rights and fundamental freedoms, health and safety and the environment. Since then, the ERM system is continuously evolving to take into account the most significant risks which can be generated as part of the Company's operations. During 2020 these risks and related response plans were consolidated and reported to the Company's top management on a regular basis.

Sustainability risks are structured around four topics reflecting the Company's four sustainability commitments: environment, human rights, safety and business integrity. To increase the consideration of sustainability subjects across the Company, the ERM Centre of Competence 2020 Confirmation Letter required all organisations to assess if human rights, health & safety and environment risks are identified, assessed, and response plans are in place, and eventually define improvement actions to address these types of risks.

The Company's direct procurement-related risks are embedded into the Company's ERM system. Specific direct procurement-related risks related to human rights are as follows (for further information, see the Non-Financial Information section of the 2020 Airbus SE Universal Registration Document):

## Regulatory non-compliance:

The Company may not receive sufficient visibility and information from its supply chain in regards to compliance with environmental, human rights, health and safety laws and regulations.

## Suppliers impact on local environment:

From the extraction of raw materials to the manufacturing of parts delivered to the Company, a supplier's industrial operations may have significant environmental impacts on the local environment where the activity is performed, with possible impacts on air, water, soil, biodiversity, workers' occupational health and safety and on the health of the general public.

## Disruption risk:

In the event that a supplier fails to comply with environmental, human rights, health and safety laws and regulations, even if caused by factors beyond its control, that failure may result in the levying of civil or criminal penalties and fines against the supplier. Regulatory authorities may require them to conduct investigations and undertake remedial activities, curtail operations or close installations or facilities temporarily to prevent imminent risks.



## Human Rights Salient Issues:

The human rights gap analysis undertaken in 2019 included an initial identification of the Company's salient areas of potential human rights risks. This identification was based on benchmarking of industry peers and companies in similar industries and analysis of stakeholder expectations, including consideration from a rightsholder's perspective.

During 2020, the Company, through the Human Rights MFT, reviewed its identified areas of potential human rights risks and took part in an internal workshop to test these risks. In addition, the Company engaged with a number of key external stakeholders, including human rights NGOs, academics / researchers and industry groups, to gain external feedback. Following these consultations, the areas of salient issues which the Company will focus on during 2021 are as follows (with impacted groups in parenthesis). Taking into account that salient issues may change over time due to internal and external influences, the Company commits to reviewing these issues on a regular basis.

### Salient Human Rights Issues

- **Impact of products and services on the right to life and liberty** (passengers and citizens)
- **Data privacy** (individuals and their personal data)
- **Transition to decarbonisation** (supply chains)
- **Forced and child labour and other labour rights** (contractors and supply chains)
- **Diverse and inclusive workplaces** (Airbus workforce and contractors)

As part of the Company's ambition to strengthen its human rights due diligence, owners for each salient issue were identified, each of whom, taking into account stakeholder feedback, began to develop action plans for each salient issue to include the scope, the current management arrangements and new actions required as well as the identification of measures of effectiveness. Risks related to these salient issues were embedded into the Company's risk portfolio in the frame of the Company's ERM system. This work will be further developed in 2021.

The following salient human rights issues relate to modern slavery. For details of all salient human rights issues, see the Non-Financial Information section of the 2020 Airbus SE Universal Registration Document

**2020 Airbus SE Universal Registration Document is available [here](https://www.airbus.com/investors/financial-results-and-annual-reports.html).**

<https://www.airbus.com/investors/financial-results-and-annual-reports.html>

### Forced and child labour and other labour rights:

Following feedback from external stakeholders, and based on the size and complexity of the Company's supply chain, this salient issue was expanded to include 'other labour rights' focused on the Company's supply chain. Key actions include reviewing the alert systems for human and labour rights, extending the scope of supplier assessments including human and labour rights and focusing on critical, rare earth and conflict materials.

### The transition to decarbonisation:

This salient risk was initially 'Impact of Climate Change on Livelihoods' (climate vulnerable communities). Whilst the Company understands the contribution aviation has on climate change and the subsequent potential human rights impacts, the focus of this issue has been amended following both internal and external stakeholder feedback and the Company's initiatives on emissions reduction, in particular the Company's ambition to develop the world's first zero-emission commercial aircraft by 2035. The scope of this salient issue will therefore focus on the human rights risks of sourcing and integrating new technology in the transition to decarbonisation. Work on defining actions will continue in 2021.

## Supply Chain Risk Mapping

In 2020, even greater focus has been placed on Airbus' supply chain. With the launch of a dedicated Sustainable Supply Chain Roadmap ("SSCR"), the Company intends to accelerate improvements upstream.

This multifunctional and multidivisional team has responsibility for leading and monitoring progress around the implementation of the four commitments of the Company's sustainability strategy throughout the Company's supply chain. This includes environment, human rights and inclusion, safety (including product safety and health and safety and quality) and business ethics.

The SSCR reports into a steering committee chaired by the Head of Sustainability & Environment and the Head of Procurement Responsibility & Sustainability and includes the representative of the Chief Procurement Officer of Airbus and the Chief Procurement Officer of its two Divisions as well as the Head of Health & Safety, the Head of Product Safety and the Head of Ethics & Compliance, or their nominated representatives. The EVP Communication and Corporate Affairs and the Chief Procurement Officer of the Company act as sponsors of the SSCR. In addition, the Head of Procurement Responsibility & Sustainability department is part of the Procurement Leadership Team ("PLT") and is responsible for facilitating the exchange of feedback on sustainability activities between the SSCR and the PLT on a regular basis.

All sustainability activities in the supply chain are based on the following key elements and principles of due diligence following the OECD Due Diligence Guidance for Responsible Business Conduct:

- Supply base risk mapping;
- Supplier engagement and contractual requirements;
- Supplier assessment/audits and development plans;
- Policies, tools and reporting.



Since 2018, the Procurement Responsibility & Sustainability department has carried out a proactive social risk mapping in line with international guidance, internal commodity expertise and externally available country indices. This risk mapping includes risks from both a country and a purchasing category perspective considering indices such as child labour, modern slavery /forced labour, recruitment practices, working time, wages, people safety at work and freedom of association. In 2019, this social risk mapping methodology was formalised and published in an internal commodity guide available to the Company's commercial aircraft business and its two Divisions<sup>1</sup>.

Based on the Company's 2018 sourcing report and following application of the risk mapping methodology (described in previous section), 412 suppliers were identified as high risk in 2019. However, taking into account the number of suppliers who had finished or are decreasing activities with the Company during this time, the number of business-relevant high risk suppliers was reduced to 397 in 2020.

In 2019, working with an independent social assurance provider, the Company began evidence based self-assessments on those high-risk suppliers identified through initial mapping. The self-assessments gather evidence on social compliance criteria such as human rights, employment practices and working conditions.

By the end of 2020, initial assessments had been launched for all identified external high-risk suppliers. 50% of all those planned have been completed, whilst the remaining are in progress.

Based on the results of the evidence based self-assessments and internal analysis, the Company will consider additional action including specific improvement action plans and on-site audits as required. This work is in addition to the checks which are carried out at the supplier on-boarding stage via the Company's Ethics & Compliance organisation. During 2021, the Company will continue to integrate this process within the Company's supplier qualification and monitoring process.

In 2019, the full scope of clauses relating to sustainability and environment criteria were included in new contracts and implementation into existing contracts has started according to the contractual roadmap of each purchasing commodity.

## Supplier Factory Visits:

In 2019, the Company introduced 'the Gemba Walk', a pocketbook applicable to commercial aircraft activities, which is a practical and visual guide for the Company's employees when visiting the shop floor of a supplier, supporting the identification and reporting of risks or improvement opportunities observed during factory visits. A dedicated pocketbook covering environment, health & safety and human rights risks was also developed in 2019 and published on the Airbus intranet. Unfortunately, restrictions put in place during 2020 due to COVID-19 significantly reduced the effectiveness of identifying risks through supplier shop floor visits.

Building on the supply chain risk mapping programme, during 2020, the Company introduced a due-diligence programme of onsite social assessments focused on human and labour rights, covering its own operations (including its subsidiaries and affiliates) using an independent social assurance provider consistent with the assessments carried out in its supply chain. An initial programme of five locations was conducted during 2020, as a pilot exercise to inform the Company's approach going forward. The sites selected for the pilot were Airbus Defence & Space at Stevenage in the UK, Airbus Helicopters in Brisbane, Australia, Airbus Helicopters in Mexico, and the Airbus Delivery Centre and the Final Assembly Line in Tianjin, China. In addition, evidence based self-assessment questionnaires, which included an assessment of policies and processes linked to human and labour rights, were conducted at STELIA Aerospace in France and Premium AEROTEC in Germany, each of which are wholly owned subsidiaries of the Company.

As of the date of this Statement, none of the assessment findings included any risks related to modern slavery or forced labour. Further analysis of the assessments and the recommendations for improvement are ongoing. A minimum of four social assessments will be carried out during 2021.

<sup>1</sup> During 2020, Airbus Australia Pacific Ltd introduced risk assessments to their supplier on-boarding process. The process of risk mapping based on country and purchasing categories is scheduled to be carried out during 2021. This will also include any follow up actions required such as supplier evidenced based questionnaires and onsite site audits.



# Effectiveness in tackling modern slavery

## Access to Remedy:

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 the Airbus 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”.

Since 2019, the Airbus OpenLine has been accessible to external stakeholders, such as suppliers and their employees, as a secure and confidential channel through which they may, on a voluntary basis, raise alerts related to the Company in the areas of bribery, human rights, environment and health and safety. This medium is available through the Airbus OpenLine website in 13 languages.

### Airbus OpenLine is available [here](http://www.airbusopenline.com).

Airbus OpenLine website  
([www.airbusopenline.com](http://www.airbusopenline.com))

In addition to OpenLine, the Company's SSCR may receive alerts from other sources including through the supplier on-boarding process, media or directly from employees.

The Company protects those who speak up and raise concerns appropriately and in good faith. The Company does not retaliate against anyone who raises a concern, or against those who assist in investigations of suspected violations. Airbus takes seriously its responsibility to investigate potential instances of misconduct, whether detected in the normal course of business, via the OpenLine or from any other source.

In the event a misconduct is confirmed, the Company considers not only appropriate disciplinary action for the employees involved, but also engages in a root cause analysis of the misconduct.

During 2020, a number of actions were taken to further strengthen human rights in the Company's ‘SpeakUp’, investigation and remediation processes. These included reinforcing references to human rights within the Company's OpenLine and investigation policies and clarifying the internal reporting process for human rights concerns.

If an allegation of human rights breach is received from within the Company or through its supply chain or other third party business relationships is found to be substantiated, remedy would be sought through a variety of mechanisms. If an alert is received via its OpenLine reporting system, the Company commits to acknowledge receipt of the report within two business days. The Company has a global network of internal investigators, tasked with investigating allegations, including those relating to human rights such as forced or child labour, or labour rights and working conditions.

During 2021, the Company will continue to strengthen its processes to monitor human rights alerts and resulting investigations, and will undertake proactive communication on these mechanisms to employees, suppliers and other third party business relationships to raise awareness.

Five alleged cases of concern related to forced labour and labour rights in the Company's supply chain were identified during 2020. These include alleged forced labour and labour rights concerns in the sites of both tier one and lower tier suppliers. Four of the cases are closed as either unsubstantiated or with a consequential action, whilst one alert is currently still under review by the Procurement Responsibility & Sustainability team. The Company will continue to investigate any new alerts during 2021.

## KPIs:

The Company has identified a number of KPIs related to human rights to measure the progress and effectiveness of its actions. During the reporting period, the following KPIs and targets were agreed:

- Number of social assessments, including human and labour rights, carried out on the Company's sites, including subsidiaries and affiliates against a target of four per year (five onsite social assessments and two evidence based self-assessment questionnaires were carried out in 2020).
- Number of alerts of human rights concerns, including labour rights and forced labour received via OpenLine or other means (five alerts were received in 2020).
- Percentage of investigations completed or in progress following reports of concerns linked to human rights, including labour rights and forced labour (100% are complete or in progress).
- Number of participants who have completed e-learning modules on human rights and modern slavery (1,493 completed in 2020, 10,096 completed in total).
- Percentage of assessments (including human rights) carried out on identified high risk external suppliers (100% of assessments carried out in 2020).

## Training and capacity building

During 2020, the Company continued to raise awareness of human rights through communication, presentations and the promotion of its dedicated training on human rights and modern slavery which is available to all employees in four languages. During 2020, 1,493 participants undertook this (10,096 in total since its launch), which included information on how to identify the signs of human rights abuse and what to do if anybody has concerns. More in-depth training on human rights, including for employees in high-risk areas and managers of subsidiaries and affiliates, is currently under consideration.

In addition, the Company made presentations to its social partners, including the SEWC, to raise awareness of its human rights ambition. There was a commitment from both sides to continue ongoing dialogue to embed and advance respect for human rights and the Company committed to provide an annual update to the SEWC as part of its governance on human rights.

---

## Future outlook

During 2021, the Company will continue its focus on embedding and advancing its commitment to respect human rights throughout its business, operations and supply chain, including through the Human Rights MFT. Specific ongoing actions include:

- Formally articulating the Company's commitments to human rights principles and standards including the United Nations Guiding Principles for Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO.
  - Embedding a process for due-diligence on human rights and strengthened human rights commitments through the Company's business management system.
  - Prioritising actions based on the Company's identified salient human rights issues.
  - Strengthening processes to monitor Human Rights alerts and resulting investigations.
  - Progressing social assessments focused on human and labour rights throughout the Company's sites, subsidiaries and affiliates.
  - Capacity building with key teams throughout the Company through development of training, communication and awareness raising.
- 

For the policies and codes referenced within this Statement that are published on the Airbus website, see: [www.airbus.com](http://www.airbus.com)

Further information on the Company's approach to sustainability can be found on [www.airbus.com](http://www.airbus.com) under the sustainability section: [www.airbus.com/company/sustainability.html](http://www.airbus.com/company/sustainability.html)

## Any other relevant information:

### Dialogue and Cooperation:

2020 has been an unprecedented year due to the COVID-19 crisis which has demonstrated the essential dimension and contribution of having a proactive employee relations strategy in the Company. Throughout the crisis, the Company has undertaken numerous discussions, consultations and negotiations with its social partners, sometimes on a daily basis, to adapt to the evolving situation resulting from both the health and economic crisis.

These various adaptation plans were carried out inline with the common principles and standards of the ILO, the OECD Guidelines for Multinational Enterprises and the principles laid down by the UN Global Compact. Employee relations are underpinned by the Company commitments made in the Company's Code of Conduct and the IFA.

The Company is in continuous dialogue with social partners on its sites in Europe, principally through meetings with management at the European Committee level but also through meetings and negotiations at national or local level. Sites outside Europe are covered by the Company's IFA framing the social dialogue and social culture in line with local labour legislation, culture and practices of respective countries.

### Global Deal for Decent Work and Inclusive Growth

The Company is an active member of the Global Deal for Decent Work and Inclusive Growth initiative ("Global Deal") that was developed in cooperation with the ILO and OECD. The Global Deal is a multi-stakeholder partnership between governments, business and employers' organisations, trade unions, civil society and other organisations that seeks to make economic growth work for all against a backdrop of rapid changes in the world of work.

### External Collaboration

During 2020, the Company engaged with a number of external stakeholders on human rights in order to advance the topic through external collaboration. These included academics, researchers, NGOs, officials and peers.

The Company is also a member of a number of industry trade associations which during 2020 held focused discussions on progressing human rights within the aerospace and defence industry. These include the BDSV (German Industry Association for Security and Defence), ASD (the Aerospace and Defence Industries Association of Europe), GIFAS (French Aerospace Industries Association) and ADS (UK Industry Association for Aerospace, Defence, Security and Space).

The Company was also asked by the UK Ministry of Defence to be the first of its suppliers to complete their Modern Slavery Assessment Tool which the Company completed in January 2020 and will continue to update.

In August 2020, it was announced that a contract had been awarded by the UK Space Agency to a consortium, led by the University of Nottingham Rights Lab, including the Company's Defence and Space Division, on a project to support anti-trafficking efforts in Uganda. The project, known as 'Anti-trafficking using Satellite Technology for Uganda's Sustainability' ("ASTUS"), will develop a stakeholder-informed Modern Anti-trafficking Support System ("MASS"), underpinned by satellite imagery and associated geospatial datasets provided by the Company, with the aim of enhancing Uganda's anti-trafficking efforts and progress towards UNSDG 8. The MASS aims to assist anti-trafficking decision-making and response at scales never seen before.

**This Statement has been approved by the Airbus SE Board of Directors and satisfies the requirements of the UK 'Modern Slavery Act 2015' and the Australian 'Modern Slavery Act 2018 (Cth)'.**

It has been signed by the Chief Executive Officer of Airbus SE who is a member of the Board of Directors. In addition, it has been signed by key senior stakeholders, namely the Executive Vice President Communications and Corporate Affairs, the Chief Human Resources Officer and the Chief Procurement Officer.



**Guillaume Faury**  
Chief Executive Officer  
28 April 2021



**Julie Kitcher**  
Executive Vice President  
Communications and  
Corporate Affairs  
28 April 2021



**Thierry Baril**  
Chief Human Resources Officer  
28 April 2021



**Jürgen Westermeier**  
Chief Procurement Officer  
28 April 2021