

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 2021 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, 2021

Contents:	Page
Our approach and progress to date	1
Our structure, operations and supply chains	2
Our governance and policies on modern slavery	4
Risk assessment and mitigation	7
Effectiveness in tackling modern slavery	9
KPIs	10
Training and capacity building	11
Future outlook	11
Any 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 operations¹ 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 ("ILO") Declaration on Fundamental Principles and Rights at Work and its Core Labour Standards. In doing so, the Company aims to implement policies and processes that respect applicable law in the countries in which it operates and take into account the UN Guiding Principles for Business and Human Rights, and the Organisation for Economic Co-operation and Development's ("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.

The Company's actions to progress its ambition to 'embed and advance respect for human rights throughout its business, operations and supply chain' related to activities under its full, direct control, follow recommendations identified through a human rights impact and gap analysis conducted by a specialist external human rights consultancy in 2019. This analysis considered current and upcoming regulatory requirements and international best practice as well as international principles and standards, including the UN Guiding Principles for Business and Human Rights.

Actions towards assessing and addressing modern slavery risks continued during 2021 and are described in this Statement.



¹ Airbus Operations Ltd (03468788); Airbus Defence and Space Ltd (02449259); Airbus Helicopters UK Ltd (01164090) and Airbus Australia Pacific Ltd (ACN 003 035 470).

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.

The Company recorded consolidated revenues of €52.1 billion in 2021. In commercial aircraft, the Company offers modern and fuel-efficient airliners and associated services. The Company is also a European leader in defence and security 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.

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.

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).

The Airbus Australia Pacific Ltd 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:

The Company's global presence includes France, Germany, Spain and the UK, fully-owned subsidiaries in the US, China, Japan, India and in the Middle East, and spare parts centres in Hamburg, Frankfurt, Washington, Beijing, Dubai and Singapore. The Company also has engineering and training centres in Toulouse, Miami, Mexico, Wichita, Hamburg, Bangalore, Beijing and Singapore, as well as an engineering centre in Russia.² There are also hubs and field service stations around the world.

As of 31 December 2021, the Company's workforce amounted to 126,495 employees of which over 15,000 were employed outside its core countries (compared to 131,349 employees in 2020), 95.7% of which consisted of full-time employees. These statistics take into account consolidation effects and perimeter changes throughout 2021. In terms of nationalities, 35.4% of the Company's employees are from France, 31.5% from Germany, 7.7% from the UK and 10.3% from Spain. The remaining 15.1% are employees from a total of 134 other countries. In total, 89.1% of the Company's active workforce is located in Europe on more than 100 sites. Depending on country and hierarchy level, the average contractual working time is between 35 and 40 hours per week.

Airbus



126,495
employees



95.7%
are full-time
employees



Airbus operates
in **170**
locations
worldwide



89.1%
of workforce
is located in
Europe on more
than 100 sites



21,000
suppliers



Suppliers in
more than
80
countries

² In line with sanctions put in place in March 2022, the Company suspended deliveries and support services to Russian customers, as well as the supply of spare parts to the country.



Airbus Affiliates:

All Company-controlled affiliates are expected to deploy similar internal policies by applying the Company's directives. A Company-wide single directive defines rules, processes and procedures applicable to the Company's affiliates and their respective boards, directors and officers. Its enforcement is supported by the Directors' training programme which, in 2021, was delivered to around 267 people over 18 full-day digital sessions.

This single directive assists the Company's affiliates in effectively fulfilling their responsibilities while assuring the Company's ongoing commitment to high standards of corporate governance. It was built on the basis of Company-related internal policies including but not limited to:

- The Company's Code of Conduct
- International Framework Agreement
- Agreement on the European Works Council
- Supplier Code of Conduct
- Health & Safety Policy
- Environmental Policy
- The Company's Anti-Corruption Policy
- Related Directives.

An online self-assessment is completed on an annual basis by the controlled affiliates to self-assess their internal controls, including how they relate to the environment, health & safety, human resources, governance, finance, procurement and compliance requirements in order to identify any gaps and define remedial action plans as required. Controlled affiliates can update the self-assessment on a quarterly basis based on their progression.

Since 2019, affiliates have also been asked to regularly evaluate risks via the Company's Enterprise Risk Management system, as well as to regularly monitor them as part of their risk assessment process.

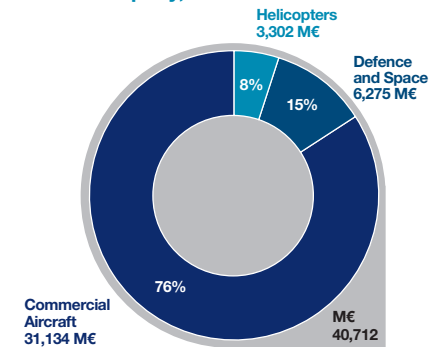
Aligned with the Australian Modern Slavery Act 2018 (Cth), during 2020 the Company held regular dialogue with its subsidiaries and operations, including Airbus Australia Pacific Ltd and its subsidiaries, on areas of risk related to modern slavery and forced labour.

Supply Chain:

At the end of 2020, approximately 21,000 suppliers from more than 80 countries supply parts, components, systems and services to the Company. In 2020, the overall external sourcing volume of the Company was valued at around €41 billion and shared between Divisions with 76% for the Company's commercial aircraft business, 15% for the Company's Defence and Space Division and 8% 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. 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. Also, Airbus regionally supports small and medium enterprises to contribute to its supply chain, particularly through tier one lead suppliers.

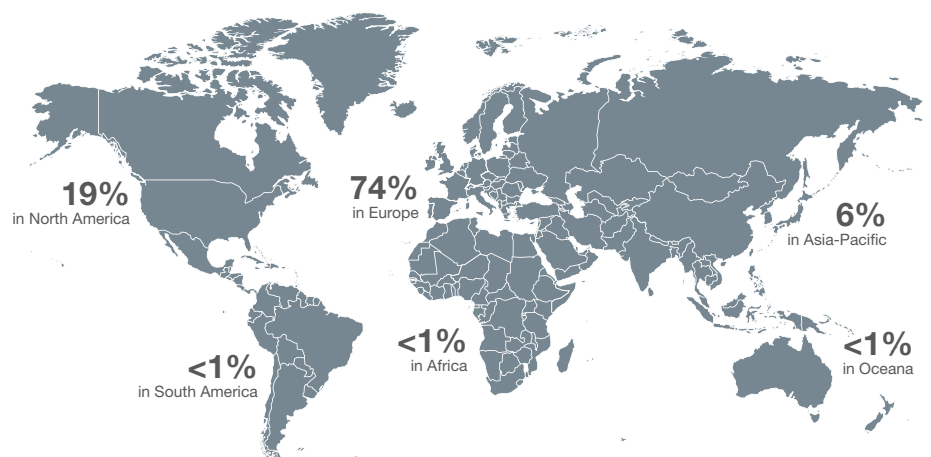
Fig 1. Overall external sourcing volume of the Company, 2020



Source: Procurement Performance & Reporting Services; Airbus Sourcing Report 2020

To promote further globalisation of its sourcing footprint, the Company has established regional procurement offices in North America (Washington, DC), India (Bangalore), Asia Pacific (Singapore) and China (Beijing). For the regional sourcing of indirect goods and services, the Airbus General Procurement function is represented in the regional procurement offices.

Fig 2. The Company's global sourcing footprint is represented as follows based on tier 1 and sub-tiers data:



Our governance and policies on modern slavery

Governance:

Conscious of the strategic importance of sustainability, the Company has defined an adapted governance and organisation at the highest level. Hence, oversight has been established at the Board of Directors level with the Ethics, Compliance and Sustainability Committee ("ECSC").

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 & 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.

The Executive Committee is supported by several committees or boards linked to the Company's four sustainability commitments including the Steering Committees of the Human Rights and Sustainable Supply Chain Roadmaps, both sponsored by Executive Committee members.



The Executive Vice President Communication and Corporate Affairs has top level accountability for human rights at Executive Committee level. During 2021, following formalisation of the Company's governance arrangements for human rights in 2020, the Company held a number of meetings and presentations to support and advance respect for human rights. These included: (Table 1)

Table 1

Governance	Number of meetings during 2021	Key responsibilities
Human Rights Multi-Functional Team, chaired by the Global Lead for Human Rights	Target 6 Achieved 6	Ensuring the development and delivery of the human rights roadmap, including actions against agreed targets and support for awareness raising and capacity building.
Human Rights Steering Committee, chaired by the Head of Sustainability and Environment	Target 3 Achieved 3	Providing strategic guidance to support decision making and prioritisation, as well as providing guidance and support on progress.
Specific presentation on human rights at the Executive Committee	Target 2 Achieved 3	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).
Specific presentation on human rights at the ECSC	Target 1 Achieved 2	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 addition, as part of the formalised governance arrangements on human rights, the topic will be presented annually at the Societa Europea Works Council ("SE-WC") meeting comprising social partners from across the Company's European sites.

The Company will review its governance on human rights as it moves from policy-setting into implementation.

Supply Chain Governance:

In 2021, the Sustainable Supply Chain Roadmap (SSCR) steering committee validated the supply chain sustainability ambition: to engage and commit our supply chain around Airbus' principles and core values.

The SSCR reports to a steering committee chaired by the Head of Sustainability & Environment, and the Head of Procurement Transformation & Central Services. The steering committee includes the representative of the Chief Procurement Officer of Airbus Commercial and the Chief Procurement Officers of Airbus Helicopters and of Airbus Defence & Space, as well as the Head of Health & Safety, the Head of Product Safety and the Head of Ethics & Compliance, or their nominated representatives.

The Executive Vice President Communication and Corporate Affairs and the Chief Procurement Officer of the Company act as sponsors of the SSCR. In addition, the Head of Procurement Transformation & Central Services is part of the procurement leadership team (PLT) and is responsible for facilitating the communication on sustainability activities between the SSCR and the PLT on a regular basis. The Chief Procurement Officer of Airbus also reports to the ECSC on the progress of Airbus responsible sourcing strategy implementation.

Policies:

In 2021, the Company continued maintaining its policies and procedures framework, issuing guidance on third party categorisation, the compliance block list³ and translating the Code of Conduct in seven additional languages to maximise the reach of this foundational document. All policies and guidelines are made available to employees on the Intranet, and classroom training is delivered to employees who are particularly exposed to underlying risks.

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>

Human Rights Policy:

Building on the human rights commitments and expectations that have existed in various key documents for many years (including within the International Framework Agreement signed in 2005, the Company's Code of Conduct and Supplier Code of Conduct), a key focus for 2021 included efforts to consolidate commitments to human rights standards and principles as well as expectations in this respect (taking into account 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), into a specific internal human rights policy. The Company expects to finalise the policy in 2022.

In addition a number of internal and external stakeholders have supported the creation of the policy including divisional and functional representatives of the Human Rights MFT and Steering Committee and members of the Legal & Compliance team. When finalised, the Company intends to have the policy endorsed by the SE-WC which represents the Company's European social partners.

Externally the policy has been reviewed by representatives from specialist expert human rights organisations, academics and civil society. The human rights policy will help further embed due diligence throughout the Company through the creation of a specific Human Rights Management System and associated Directive. A key focus for 2022 will also include the development of methods and guidelines to support policy adherence as well as communication and associated training prioritising high risk functions.



³ List of individuals or entities presenting elevated compliance risks.



International Framework Agreement:

In the International Framework Agreement ("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 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.

Airbus Supplier Code of Conduct:

The Company strives to make environmental and social responsibility a core element of its procurement strategy. This includes managing the relationships with suppliers throughout the 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 shall be conducted by suppliers in compliance with the principles of the Company's Supplier Code of Conduct, which is the document of reference for the Company's responsible supplier management. 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.

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>

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. During 2021, 79% of the Company's sourcing volume had committed to its principles (based on a target of 50% in 2021 and 80% by 2022).

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

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 all suppliers to comply with applicable laws and regulations on conflict minerals, including any 3TG conflict minerals.

Since 2019, the Company has been a member of 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. Also in 2019, the Company released a Responsible Mineral Policy, 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 at 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. The new Supplier Code of Conduct formally requires suppliers to establish a policy and a management system to assure that critical raw materials are sourced responsibly. 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. For this small portion of direct import, the Defence and Space Division is proactively asking suppliers to disclose proof of responsible sourcing and is cross-checking this data with third parties audits available through the RMI trade association.

Risk assessment and mitigation

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.

Applied across the Company and its main subsidiaries, the Enterprise Risk Management System ("ERM") is a permanent top-down and bottom-up process, which is executed across Divisions at each level of the organisation. It is designed to identify and manage risks and opportunities.

ERM is an operational process embedded into the day-to-day management activities of programmes, operations and functions. The top risks and their mitigations are reported to the Board of Directors through a reporting synthesis, consolidated on a quarterly basis. The ERM system relies on five pillars:

- Anticipation: early risk reduction and attention to emerging risks;
- Speak-up & early warnings;
- Robust risk mitigations;
- Opportunities; and
- Strong Governance.

Sustainability risks and opportunities are fully embedded in the Company's ERM. Internal audits are also performed regularly across the Company, including on sustainability topics. External audits are also performed in line with certification requirements as detailed in the related material topic sections.

A specific risk category regarding sustainability-related risks in the supply chain has been integrated into the risk management plan.

Direct procurement-related risks related to human rights are as follows (for further information, see the 2021 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 & safety laws and regulations.

Supplier's impact on the 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 adverse impacts including on the land rights of the local or indigenous communities and on forced & child labour.

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.

In response to the above the Company deploys responsible sourcing activities and specific supplier due diligence actions in the frame of the SSCR.

Salient Human Rights Issues:

The Company's salient human rights issues (see box with impacted groups in parenthesis) were initially identified through a human rights impact and gap analysis carried out in 2019. This identification was based on a benchmark of industry peers and companies in similar industries and an analysis of stakeholder expectations, including consideration from a rights-holder perspective. These issues were reviewed, updated and validated during 2020 through the Human Rights MFT and engagement with a number of key external stakeholders, including human rights NGOs, academics/ researchers and industry groups.

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)

Risks related to the salient issues were embedded into the Company's risk portfolio in the frame of the Company's ERM system and an associated action plan developed to identify, assess and address identified impacts. Actions are reviewed regularly by the Human Rights MFT and any salient issues requiring particular focus are escalated to the Human Rights Steering Committee as well as the Executive Committee and ECSC as required. An update of actions related to the Company's salient issues follows, with further actions progressing throughout 2022. Taking into account that salient issues may change over time due to internal and external influences, the Company is committed to reviewing them annually.

2021 Airbus SE Universal Registration Document is available [here](#).



The following salient human rights issues relate to modern slavery. For details of all salient human rights issues, see the 2021 Airbus SE Universal Registration Document

Forced and child labour and other labour rights

(contractors and supply chain):

Key activities to mitigate the risk of forced and child labour and other labour rights in the Company's supply chain included the roll out of the Company's revised Supplier Code of Conduct, with strengthened expectations on forced and child labour as well as other human and labour rights and a requirement for suppliers to formally confirm adherence to the Supplier Code of Conduct and to cascade the principles throughout their supply chain. In addition, the Company took actions to strengthen its supply chain due diligence including updated risk mapping (country and activity) and a review of its risk identification and alert management process.

The transition to decarbonisation

(supply chain):

2021 was dedicated to identifying the key areas of risk that the Company's transition to decarbonisation may create, affecting in particular human rights. The identified areas include the potential impact on local communities of the production of Sustainable Aviation Fuels (SAF), offset initiatives or specific minerals required in the development and manufacturing of new technology. The Company is already engaged in various coalitions (e.g. the Roundtable for Sustainable Biomaterials and the International Sustainability and Carbon Certification) to ensure that human rights dimensions are considered in these areas.

Supply Chain Risk Mapping:

The Company continued to assess its supply chain for any concerns related to human rights, including forced and child labour and other labour rights, throughout 2021.

Since 2018, the Procurement Responsibility & Sustainability department has carried out proactive social risk mapping in line with international guidance, internal commodity expertise and externally available country indices. In 2021, with the support of external advisors, Airbus upgraded its risk mapping methodology building on risk indexes considering the location and the type of activity performed by the suppliers and delivering an on-going and up to date risk assessment. This risk mapping will be incorporated in 2022 into the Company's supply chain management tools to provide visibility of those risks to the whole procurement organisation⁴.

Based on the Company's active supply base and new suppliers identified as possible future partners, 837 suppliers were identified as possible risky suppliers. After business impact and business strategy analysis, 412 suppliers were confirmed as high risk in 2019. In 2021, analysis was updated in consideration of business context evolution, leading to 395 business relevant high risk suppliers.

Since 2019, the Company has worked with external expert companies to conduct sustainability-related, evidence based desktop assessments and specific on-site audits. The assessments cover social compliance criteria such as human rights, labour practices, health & safety and anti-corruption as well as environmental regulations and sustainability criteria based on an environmental questionnaire developed by the International Aerospace Environmental Group.

At the end of 2020, 63% of the suppliers identified as high risk following the Company's 2019 risk mapping methodology had completed an evidence based desktop assessment.

In 2021, the percentage of risky suppliers assessed increased to 95% compared to a target of 100%. The progress and results of those assessments have been communicated during events with suppliers and engagement took place with all suppliers presenting findings. Of the 95% of suppliers completing an assessment, 13% of which (53) have at least one red flag (mainly linked to environmental issues). In 2021, the Company has started to engage on the results asking those suppliers to complete action plans to close any finding.

During 2021, the Company reviewed the self-assessment questionnaire and assessment grid to ensure that:

- a. they are fit for purpose,
- b. that critical issues are identified and
- c. there is more efficient completion.

Proposed changes include adapting the questions, particularly on environmental topics, to take into account the size of supplier (e.g. feedback has told us that smaller suppliers don't necessarily have the resources to complete such a demanding questionnaire) and to the assessment grid to identify critical issues, particularly with regard to human rights and health & safety.

In addition, the Company is currently reviewing its relationship with suppliers who refuse to participate in its assessment programme.

Due diligence:

During 2021, the Company began to strengthen its risk-based human rights due diligence taking into account the OECD Due Diligence Guidance for Responsible Business Conduct. This focus, which will continue throughout 2022, included:

- Supply chain due diligence
- Due diligence within the Company's own operations
- Product and service due diligence (focused on the Company's Defence Division)

⁴During 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 was completed during 2021 and will be reviewed and updated as an annual activity moving forward.



Effectiveness in tackling modern slavery

Social assessments (focused on human and labour rights):

During 2021, the Company conducted a number of onsite social assessments focused on human and labour rights covering its own sites. These onsite assessments were carried out using an independent third-party social assurance provider consistent with the assessments carried out in the Company's supply chain. Building on the initial pilot carried out during 2020, eight sites (against a target of four) undertook a social assessment during 2021 in countries including Germany, Belgium, US, France, Italy, Malaysia, China and the Philippines. The sites were selected based on an analysis of country risk using publicly available indices (including child labour, forced labour and labour rights), the type of activity (prioritising production facilities) and the number of employees. In addition, any alerts relating to human rights coming from other sources, including the Internal Controls Self Assessment process, and upcoming legislative requirements were also taken into account.

During the course of some of these assessments, specific opportunities to improve working practices were identified.

The Company has a target to ensure that all findings are closed within an 18 month period following assessment. In addition, in order to strengthen its due diligence process, the Company has set a target to ensure that 100% of its sites with over 100 employees are assessed for human and labour rights risks by the end of 2026.

Access to Remedy:

The Company 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 Company's Code of Conduct. Employees can raise concerns to their line manager, their human resources business partner, to a Legal & Compliance representative, or through the Company's "OpenLine" hotline (www.airbusopenline.com). The OpenLine is anonymous where legally permissible and also available to external stakeholders, including affiliates and suppliers, and covers all sustainability topics. The Company endeavours to ensure that the procedures to assess, investigate and manage allegations are well aligned throughout the Company.

From 2019, the Company's 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 Company's OpenLine website (www.airbusopenline.com) in 13 languages.

Access to this OpenLine has been reiterated in the updated Supplier Code of Conduct. In addition to OpenLine, the Company's SSCR may receive alerts from other sources including through the supplier onboarding process, media or directly from employees.

If an allegation of human rights breach 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 investigated four alleged cases of concern related to forced labour and other labour rights from within the Company's supply chain. All of the cases are closed as either unsubstantiated or with a consequential action. The Company will continue to investigate any new alerts during 2022.

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

Airbus OpenLine website
(www.airbusopenline.com)



KPIs

Human Rights	GRI	SDGs	Others
	412 Human Rights Assessment 102-9 Supply Chain 204 Procurement Practices 408 Child Labor 409 Forced or Compulsory Labour 414 Supplier Social Assessment	4,5,8,9,12, 13,16,17	Vigilance Plan
Highest governance body(ies) involved	Board of Directors / ECSC		
Related Corporate Policies and Reference Documents	Code of Conduct; International Framework Agreement; Airbus Supplier Code of Conduct, Responsible Mineral Policy		
Commitments to take into account external standards and frameworks	International Bill of Human Rights, ILO's Declaration on Fundamental Principles and Rights at Work and its Core Labour Standards, OECD Guidelines for Multinational Enterprises, United Nations Guiding Principles		

KPIs	Target	Target Year	2020	2021	2021 v. 2020
% of investigations completed or in progress ⁽¹⁾	100%	Permanent	100%	100%	–
% of sites having undertaken a social assessment ⁽²⁾	100%	2026	6%	14%	+8pp
% of findings closed within 18-months ⁽³⁾	100%	Permanent	100%	100%	–
% of identified high risk suppliers ⁽⁶⁾ , who have undergone a sustainability assessment	100%	2021	63%	95%	+30%
% of sourcing volume ⁽⁷⁾ covered by supplier commitment to the Supplier Code of Conduct ⁽⁸⁾	85%	2022	N/A	79%	N/A

Other Key Metrics	2020	2021	2021 v. 2020
Number of participants to human rights trainings – Cumulative, reporting period: 1 Oct – 30 Sep ⁽⁴⁾	4,943	5,789	+846
Number of alerts of human rights concerns ⁽⁵⁾	5	4	-1
% of assessed suppliers not meeting Airbus' sustainability expectations (=red flags)	12%	13%	
% of action plans defined for suppliers not meeting Airbus' sustainability expectations	N/A	15%	

KPI and metrics assumptions:

- (1) following reports of concerns linked to forced and child labour and other labour rights.
- (2) % of the Company's sites with over 100 employees, cumulative since 2020, undergoing a social assessment including human and labour rights.
- (3) following social assessments including human and labour rights, carried out on the Company's sites.
- (4) Cumulative number of participants who have completed e-learning modules on human rights and modern slavery since 2018.
- (5) including forced labour and labour rights (received via OpenLine and other means) from internal sources or through the Company's supply chain.
- (6) based on 2019 risky suppliers.
- (7) based on 2020 turnover.
- (8) Subsidiaries excluded from the scope



Training and capacity building

During 2021, the Company continued to raise awareness of human rights including through the promotion of its dedicated training on human rights and modern slavery which is available to all employees in four languages. During the period October 2020 – September 2021, 846 participants undertook this training (5,789 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. In addition, two dedicated virtual awareness sessions were run for the heads of subsidiaries (attended by 140 people) to raise awareness of human rights which included practical examples of how to identify and report risks. The sessions were recorded so that those not able to attend directly could review the recording. A dedicated eLearning module on human rights, targeting senior managers, including the heads of subsidiaries and controlled affiliates, was produced in 2021 and will be rolled out during 2022. In addition a new e-learning module will be created for all employees to raise awareness of human rights with the intention that this becomes mandatory to all employees from 2023.

Future outlook

During 2022, the Company will continue its focus on embedding and advancing its commitment to respect human rights throughout its business, operations and supply chain. Specific ongoing actions include:

- Finalisation of the Company's human rights policy.
- Embedding human rights commitments throughout the Company.
- Further progressing risk-based due diligence within the Company.
- Prioritising actions based on the Company's identified salient human rights issues (to be reviewed in 2022).
- Progressing social assessments focused on human and labour rights throughout the Company's sites.
- Capacity building with key teams including development of training, communication and awareness raising.
- Ensuring alignment of actions with current and upcoming legislation.

For the policies and codes referenced within this Statement that are published on the Airbus website, see: www.airbus.com

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



Any other relevant information:

Dialogue and Cooperation:

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 also 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.

Regular social dialogue is ensured as per ILO requirements and local legislation and company agreements about social dialogue, for instance in Europe, thanks to the Company's SE-WC agreement which was updated in 2018.

Labour relations and social dialogue are fully part of the Company's DNA and therefore, its continuous evolution and improvement are embedded in the Company's Human Resources strategy supporting the Company's business challenges. Especially, in cases of restructuring, the Company strives to limit as much as possible the negative impacts on its workforce, and considers employment as a priority.

In line with the Company's global social dialogue strategy and since 2019, the discussions with its social partners have not only been assured at local or European level but have also happened at global level with the creation of the Airbus Global Forum ("AGF"). In line with the Company's commitments in terms of Sustainability, the AGF is a clear illustration of the company's engagement for a responsible social dialogue. The seat allocation for employee representatives is based on headcount distribution across the globe and conditional to existing legal employee representation as per applicable regulations and practices in the relevant countries.

The second AGF took place early July 2021 in a digital format and has proven again to be an effective exchange platform between the Company's top leaders in the regions and employee representatives from its home countries, Poland, Romania, Morocco, Tunisia, Brazil, New Zealand, Australia, Mexico, Canada and China. The AGF agenda triggered insightful discussions around business highlights including the

challenges and priorities for 2021 and 2022 as well as I&D, People Ethics & Compliance - especially anti-harassment - and the Company's well-being strategy. It also served as an opportunity to enhance the perspective of the Company's social partners on local and regional practices with regards to social matters, especially out of the Company's European home 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.

Stakeholder engagement and collaboration:

During 2021, the Company joined the Global Business Initiative on Business and Human Rights (GBI), a specialist peer learning group focused on advancing respect for human rights throughout the world. As part of its membership, the Company also took part in two dedicated workstreams: downstream due diligence and tracking and measurement, the progress of which were shared with other GBI members.

The Company is also a member of a number of industry trade associations which during 2021 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), ADS (UK Industry Association for Aerospace, Defence, Security and Space) and TechUK (the UK's technology trade association).

The Company also engaged with a number of external stakeholders on human rights in order to advance the

topic through external collaboration. These included academics, researchers, civil society organisations, officials and peers.

A number of discussions with the Company's investors on the topic of human rights also took place during 2021, including on the topic of forced labour.

In addition, an update of the human rights roadmap was also presented to key internal stakeholder groups including the SE-WC and the European Committee for Airbus Defence and Space comprising social partners from across the Company's European sites.

During 2021, the Company's Defence and Space Division continued to work with the UK's University of Nottingham Rights Lab on a project to monitor supply chain human rights challenges across sectors including maritime, agriculture and mining. Analysis of earth observation satellite imagery helps to identify supply chain human rights issues, such as flagging suspicious activities for further investigation, or can act as additional evidence for reported supply chain issues. The Division has also started to scope its own supply chain risk assessment tools for the Company by integrating satellite imagery derived intelligence with additional reported data from third parties on potential supply chain human rights risks.

Regulatory compliance:

During 2021, the Company undertook an analysis of current legislation related to human rights including the French Devoir de Vigilance Law and the Modern Slavery Acts in the UK and Australia. In addition, the Company undertook an analysis of relevant upcoming legislation including the German Act on Corporate Due Diligence Obligations in Supply Chains. Actions to fill any identified gaps will be undertaken throughout 2022.



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
5 May 2022



Thierry Baril
Chief Human Resources Officer
5 May 2022



Julie Kitcher
Executive Vice President
Communications and
Corporate Affairs
5 May 2022



Jürgen Westermeier
Chief Procurement Officer
5 May 2022