Code of Conduct



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A Code to luide us in conducting business with honesty and integrity"

CEO's message



Dear Colleagues,

At Airbus, it's essential that we hold ourselves to the highest ethical standards in everything we do. As a company, we will stand or fall by our commitment to these standards. Indeed, it's why integrity and compliance are two of our five pillars as a company, alongside safety, quality and security.

In the recent past, our failure to act with integrity carried an extremely heavy financial and reputational cost for Airbus; a cost that we cannot afford to bear again.

This new Code of Conduct sets out the fundamental values that our company should embody. They should guide all our commitments every day.

Please read the new Code carefully, reflect on it and let it guide your daily practices. Together, we will continue to meet the challenges of the aerospace sector while staying true to our values.

Thank you for your unwavering commitment.

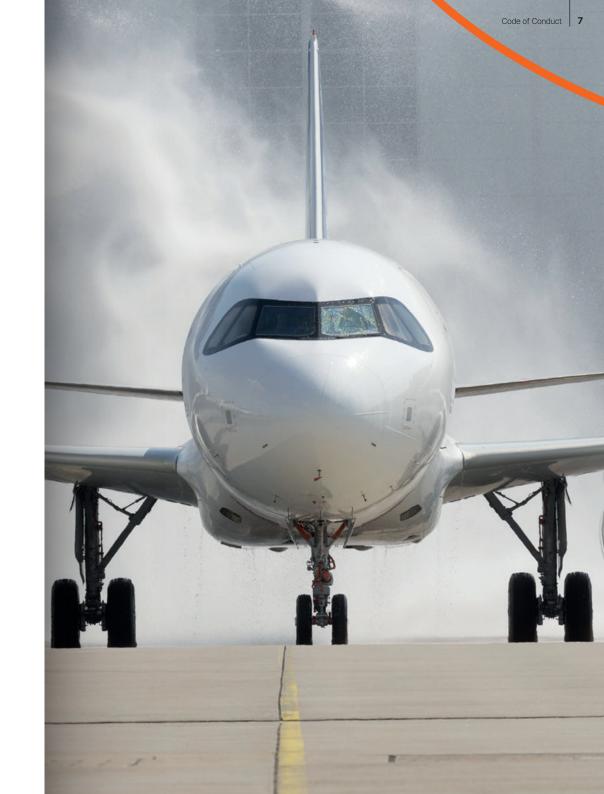
Sincerely, — Guillaume Faury

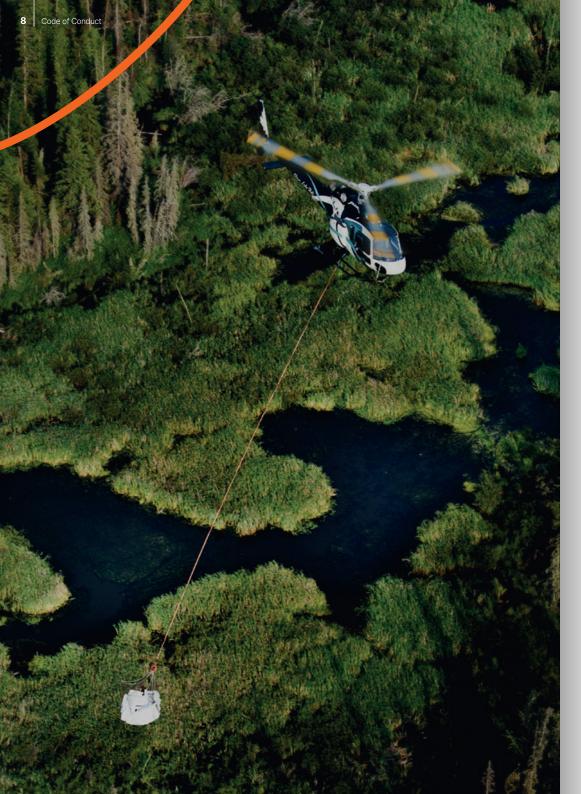
To whom does this Code of Conduct apply?

From final assembly lines to our corporate boardroom, we embrace and demonstrate our adherence to this Code of Conduct throughout our organisation.

This Code of Conduct applies to all Airbus employees and directors, regardless of their job title, responsibilities, seniority or location, within every subsidiary or joint venture where we have control. Additionally, Airbus promotes the adoption of strong ethical standards by our other stakeholders, including customers, suppliers, partners and contractors.

We have published this Code of Conduct in order to make it easily accessible to our employees, directors and to these other stakeholders, whom we encourage to adopt similar standards.





Role of this Code of Conduct in our Business

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

Although this Code of Conduct provides practical examples on issues that arise frequently, it is impossible to anticipate every situation that may arise.

When in doubt, we encourage you to follow these four steps:

1. STOP, REFLECT AND GATHER **ALL FACTS**

Does the situation make you or others feel uncomfortable? Do you have all the relevant facts? Are there any specific procedures that should be applied?

2. ASSESS THE SITUATION

Is it consistent with Airbus values and our pillars of safety, quality, integrity, compliance and security?

3. SEEK ADVICE

You are not alone: we encourage you to discuss the situation with your manager, a subject matter expert, your Human Resources Business Partner (HRBP) or a member of the Legal & Compliance team.

4. ACT AND LEARN

Follow up on the result and consider lessons learned.

Failure to comply with our Code of Conduct can have serious consequences for the company and individuals:

- Damage to Airbus' reputation, making it hard to maintain the trust of our colleagues, customers, partners and other stakeholders.
- Legal consequences, such as fines, lawsuits or, in the worst case, criminal prosecution.
- Harm to team morale and engagement, as colleagues may feel uncomfortable or demotivated in a work environment where rules are not respected.
- Disciplinary action, which may range from a formal warning to a potential dismissal, depending on the severity of the violation.

This is why it is essential for employees to understand and respect our Code of Conduct.





Speak Up and Listen Up

Airbus is committed to fostering a work environment where all employees feel comfortable sharing their views, asking questions, expressing concerns or reporting wrongdoing. In doing so, we manage to prevent, detect and remediate potential misconducts.

You can Speak Up to your manager (or a more senior manager), your Human Resources Business Partner (HRBP), an Ethics & Compliance Representative, an Export Control Point of Contact or a member of the Legal & Compliance team. You may also provide information confidentially or anonymously through the Airbus OpenLine (www.airbusopenline.com). As a manager or team leader, you must Listen Up to these concerns, escalate when appropriate and provide feedback accordingly.

Airbus does not tolerate any retaliation against those who Speak Up, or who assist in investigations of suspected violations.

If you believe you have been retaliated against for reporting a concern in good faith, please contact the Legal & Compliance team immediately.

All reports are managed in accordance with formal Airbus-wide policy and applicable local regulations. During the investigation process, an independent and objective team obtains facts under the presumption of innocence, fairness and confidentiality principles. Airbus expects all persons involved in an investigation to fully and honestly cooperate. Remedial and disciplinary measures may be taken in the event of demonstrable breaches. If you report a concern, you will receive feedback on the outcome, while maintaining the confidentiality and privacy of all involved. Nothing in this Code of Conduct prevents you from reporting potential violations of law to relevant authorities.





Our values

We are One / Team Work! Customer Focus Reliability Respect Creativity Integrity



People & Culture



Illustrative examples



Translating company priorities and strategic orientation into concrete objectives and achievable tasks for the teams.



Challenging our core beliefs to be prepared for an ever evolving world and society.



Managing the performance of our activities and acting swiftly in case of deviation from the planned trajectory.



Listening actively and promoting dialogue between our employees across all levels.



Ensuring our company principles and values are embedded in our behaviours.

We do

Take ownership for our sphere of influence and drive success.

Do the impossible to satisfy our customers.

Ensure the connection between our leadership and operational teams.

Encourage a speak up culture.

We don't

Retreat from difficult decisions. even in the face of uncertainty.

Compromise on our pillars: safety, quality, security, integrity and compliance.

Prioritise individual achievements over company success.

Leave conflicts unaddressed.

Illustrative examples



Ensuring all labour agreements and policies are implemented consistently across all regions, respecting international standards and local laws.



Working to balance employee needs with company goals.



Supporting employees' rights to freely express themselves and choose whether to join a union without fear of retaliation.

We do

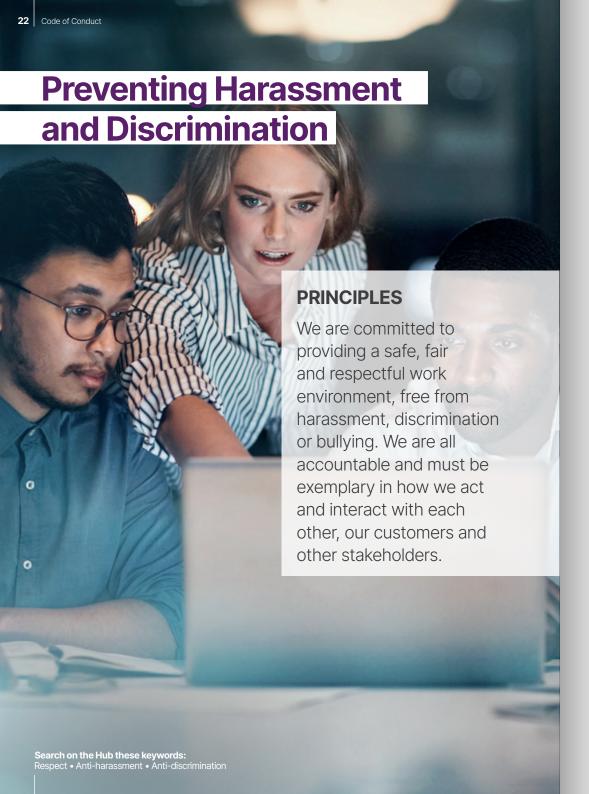
Favour social dialogue as a means to support fair and equitable treatment of all our employees.

Recognise union activities and contributions according to labour laws and applicable company agreements in each country while not compromising company interests when taking decisions.

We don't

Interfere with or influence the free choice of employees to form or join a body to represent their interests.

Treat any employee or trade union member more or less favourably than others.





Verbal abuse such as yelling, insulting, criticising or belittling another individual.



Threatening, humiliating or intimidating another individual.



Making sexual advances or touching someone against their will.

Displaying images, posters or videos of a sexual nature.



Not offering a position to someone based on a personal characteristic, such as age, gender, race, nationality, religion, sexual orientation or physical ability.

We do

Treat everyone we meet in the course of business with dignity and fairness, understanding the impact we can have on others.

Stay respectful at all times.

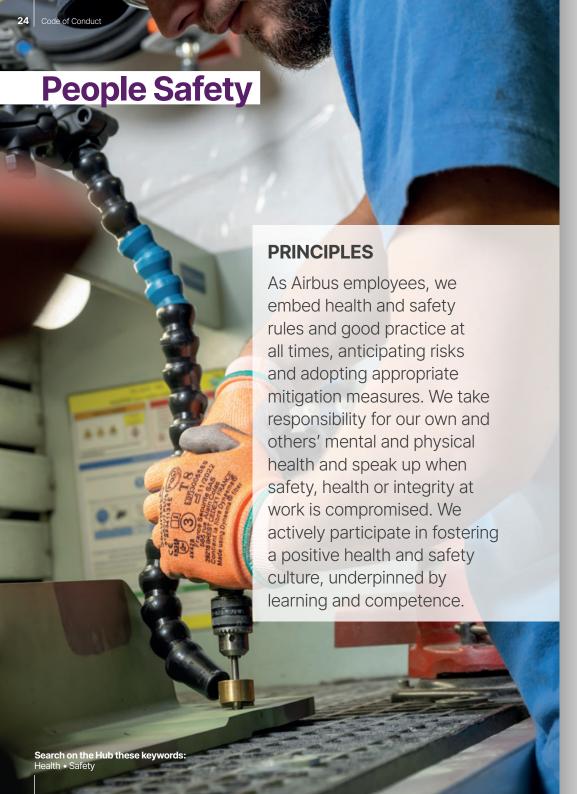
Speak up or ask for help when we experience or witness inappropriate behaviour.

We don't

Ignore inappropriate behaviours.

Enable uncivil behaviours to become normalised.

Mirror or copy the wrong behaviours.





Not wearing the mandatory or appropriate personal protective equipment.



Having workstations that are ill-configured with respect to safety or ergonomics.



Improper use or handling of chemicals or other hazardous substances.

We do

Ensure we understand the health and safety risks related to our activities and the measures designed to prevent them.

Maintain our health and safety skills and awareness.

Manage accidents by securing the situation, reporting the event and re-evaluating our preventive measures.

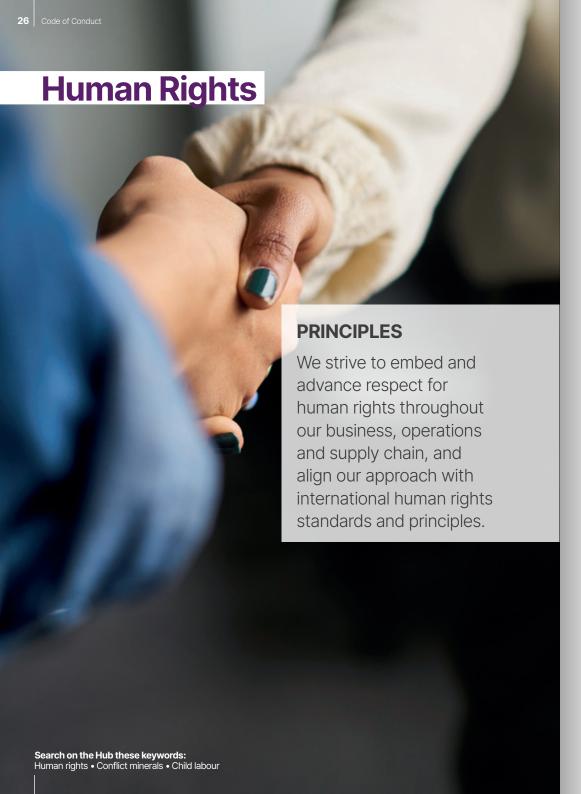
Intervene or speak up if we see health and safety standards being compromised.

We don't

Ignore health and safety best practices defined for our workplace or activities.

Compromise health and safety due to constraints such as time, budget or performance criteria.

Underestimate the risks associated with our activity or workplace.





Indicators of worker exploitation. For instance, excessive working hours or being coerced into work through measures such as passport retention.



Conditions or circumstances that reflect possible mistreatment of workers, such as unsafe or unsanitary working conditions.

We do

Strive to avoid, prevent or mitigate adverse impacts on human rights that occur in connection with our business activities, regardless of whether we have caused. contributed or are directly linked to these impacts.

Seek to ensure that sourcing of raw materials does not contribute to human rights abuses or fund conflicts, and is free from forced or child labour.

Pay particular attention to vulnerable groups, such as migrant workers or other minority groups.

Respect the rights of local communities and indigenous peoples, including the right to free, prior and informed consent.



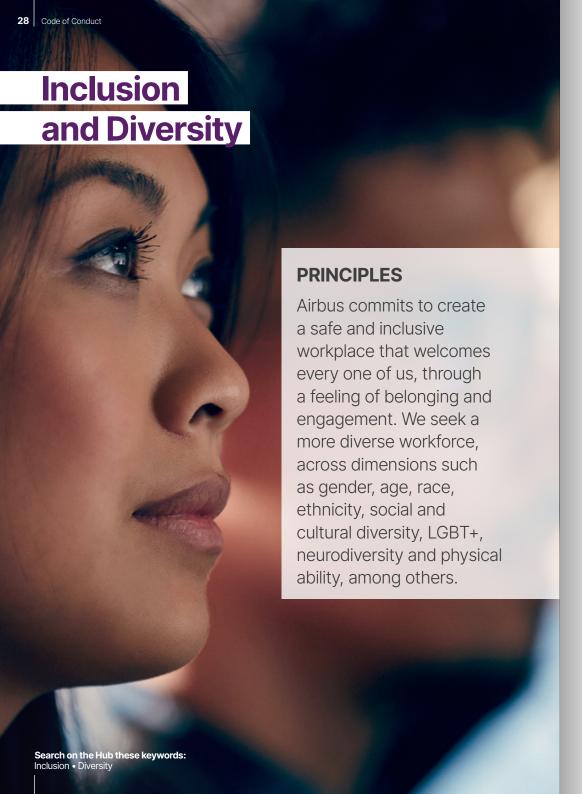
Employing children under the age of 15 (even if allowed by local law).

We don't

Knowingly cause or contribute to actions which violate human rights and go against our Company Human Rights Policy.

Ignore circumstances which could violate the human rights of anyone associated with Airbus' products or services.

Tackle an issue without seeking appropriate internal guidance or expertise, as doing so may result in unintended consequences.





Organising team activities that ignore one's physical ability or cultural sensitivities.



Making jokes that could be understood to be racist, sexist, homophobic or insensitive.



Starting rumours or undermining someone's reputation.

We do

Seek out different points of view and are intentionally inclusive, maintaining an open, safe, and welcoming environment.

Remain mindful of our words and actions and their impact on others, and speak up when we see disrespectful behaviour.

Acknowledge any unconscious biases (based on a personal characteristic, such as age, gender, race, nationality, religion, sexual orientation, or physical ability) that may interfere with our business judgement.

Take time to educate ourselves on the topics.

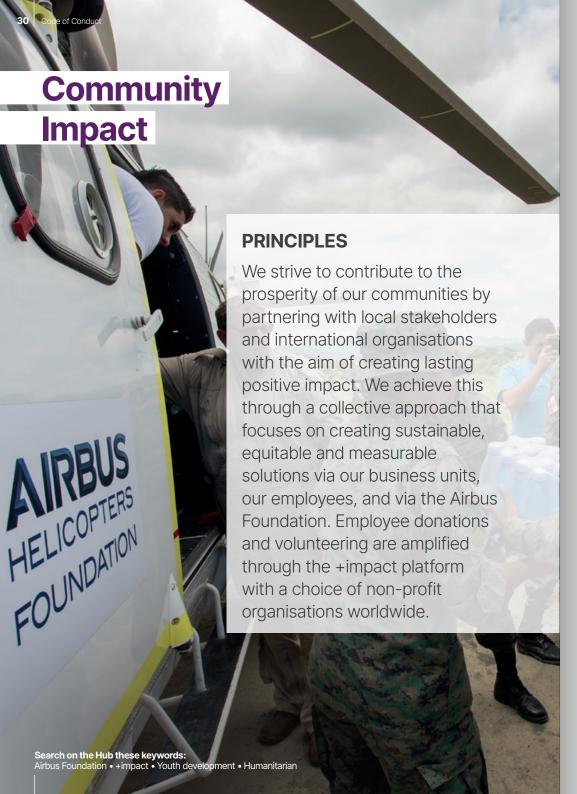
We don't

Use language that is based on clichés or stereotypes.

Show favouritism.

Exhibit exclusionary behaviours, which may include incivility, bullying and workplace harassment: discriminate or isolate individuals and groups who are different.

Make decisions based upon diversity dimensions alone, ignoring an overall evaluation of all the factors involved.



Illustrative examples



Supporting youth development by deploying educational and skills development programmes.



Through the Airbus Foundation, providing access to Airbus products and services to support disaster response and environmental conservation.



Through the +impact platform, enabling employees to volunteer, donate, raise funds and take action on sustainability topics.

We do

Familiarise ourselves with the community impact priorities and mechanisms that exist to contribute to positive social impact.

Ensure that company charitable contributions are appropriate, proportionate and aligned with the community impact strategy.

We don't

Make any charitable donation (including political contributions) on behalf of Airbus without prior review and approval under the applicable Airbus policies on sponsorships and donations.

Associate employee volunteering actions such as planting microforests or litter collection initiatives with Airbus' environmental targets.





Line station personnel being ill-equipped or disregarding foreign object debris (FOD) procedures.



Working on power harness (galley systems) without the proper tools or qualification.



Failing to report a finding or non-conformity which could impact safety.



Failing to listen or take into account an internal speak-up on safety.

We do

Recognise our duty to keep the public and users of our products

Remain aware of how we contribute to safety in our daily work.

Raise any concerns about safety immediately.

We don't

Miss the opportunity to share lessons learned with respect to safety.

Engage in online discussions or make public comments about accidents, incidents or other operational events.

Remain silent when we have a safety concern.



Foreign objects that endanger the product and need to be removed.



Installing equipment that does not meet specifications.



Unauthorised changes in documentation.

We do

Work with the required qualifications.

Assume responsibility for quality and recognise our mistakes.

Follow written standards and instructions.

Request validation when we change our product or system definition.

Seek continuous quality improvement and perform "right first time".

We don't

Leave a non-conformity undeclared or uncorrected.

Ignore a task that has not been effectively performed.

Put pressure on anyone to perform unauthorised activities, or to rush or bypass required quality controls.

Misrepresent or falsify quality, safety or productivity metrics for internal or external reporting.



Granting IT access to unauthorised individuals.



Allowing visitors to "tailgate" and bypass physical access controls at Airbus sites.



Using, modifying or disclosing the proprietary information of third parties without authorisation.

We do

Wear our company badge and display our car pass when on site.

Choose a strong and unique password and lock our computer when unattended.

Classify and handle information in line with legal and company requirements.

Report security concerns and suspicious activities (such as emails, calls, ransomware or intrusions) to the security team.

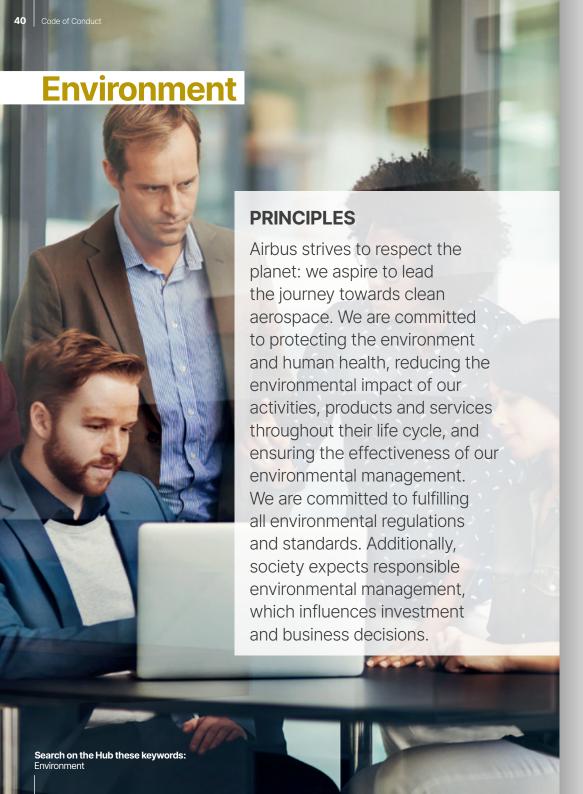
We don't

Share login credentials, use the same passwords for multiple accounts or bypass physical access controls; post pictures of our badge on social media.

Take photographs or videos in restricted areas without permission.

Accept suspicious connection requests or information queries via social media.

Take or access any of Airbus' or third party proprietary information after leaving the company.



Illustrative examples



Committing to the reduction of industrial emissions and the greenhouse gas emissions intensity generated by our commercial aircraft in service.



Working towards a circular economy to reduce the use of natural resources throughout the entire product life cycle.



Reducing our individual water consumption at work matters: two thirds of our water consumption comes from sanitary uses.



Engaging stakeholders, including all employees, we have organised "Climate Fresk" sessions and launched a "Climate School" to build a shared understanding of climate change and its impacts.

We do

Understand and measure our

Follow internal policies and procedures to comply with regulatory requirements and

Continuously promote training

We don't

Exaggerate or make unsubstantiated claims about our environmental performance.

Turn a blind eye to practices or conditions that could harm the environment.



Integrity & compliance

Bribery and



Anti-bribery • Anti-corruption

PRINCIPLES

We have zero tolerance for bribery, corruption and influence peddling. This means we do not promise, offer, give, solicit or receive - directly or indirectly money or anything of value to or from another person, in order to obtain or retain business or secure some other improper advantage (bribery). Likewise, we do not promise, offer or give money or anything of value to someone in order to abuse their influence with government officials or authorities (influence peddling). We do not make small, unofficial payments to a government official to speed up or obtain a routine administrative. process (facilitation payments).

Illustrative risks



Awarding business to a customer decision maker's personal company or pet project, to gain advantage in an upcoming aircraft deal.

Granting excessive discounts on our products and services to a reseller, which could be used to fund improper payments.



As part of offset obligations, selecting suppliers with no apparent value at the request of local authorities.



Employing an individual who is the relative of a key decision-maker.



Organising a sightseeing trip with luxury meals and lodging over the weekend, after a regulatory inspection visit has been concluded.

We do

Win contracts based on the quality of our products and services.

Report any suspected bribery risks or improper requests by customers, suppliers or government officials.

Before offering or accepting any gifts or hospitality, ensure that the value is reasonable and the aim is legitimate (such as promoting our products).

Declare and obtain pre-approval for any gift, hospitality, sponsorship or donation, when the value exceeds the thresholds set by Airbus.

We don't

Engage in or tolerate any form of corruption, including the acceptance of kickbacks in the context of a procurement process.

Offer, request or receive payments or benefits of any kind, which are intended to influence a pending business, regulatory or other decision.

Relationships with Third Parties

Search on the Hub these keywords:

Third parties

PRINCIPLES

We only work with reputable third parties who uphold the highest standards of quality, integrity, responsibility and sustainability, and provide Airbus with the value they have promised to deliver. We conduct risk based due diligence prior to the start of the relationship with any third party. We monitor the alerts on third parties throughout the entire business relationship.

Illustrative risks



Working with third parties who suggest they could offer, make or request payments on our behalf.



Engaging a third party (e.g., sales intermediary, strategic advisor, lobbyist or partner) without a clear scope of work and written contract.



Working with a third party that is unclear about its ultimate beneficial owners or funding sources.



Hiring a sales intermediary, consultant or advisor because of their connections with decision-makers in order to improperly influence their decisions.

We do

Collaborate with the Legal & Compliance team to categorise every third party appropriately and conduct due diligence according to their risk profile.

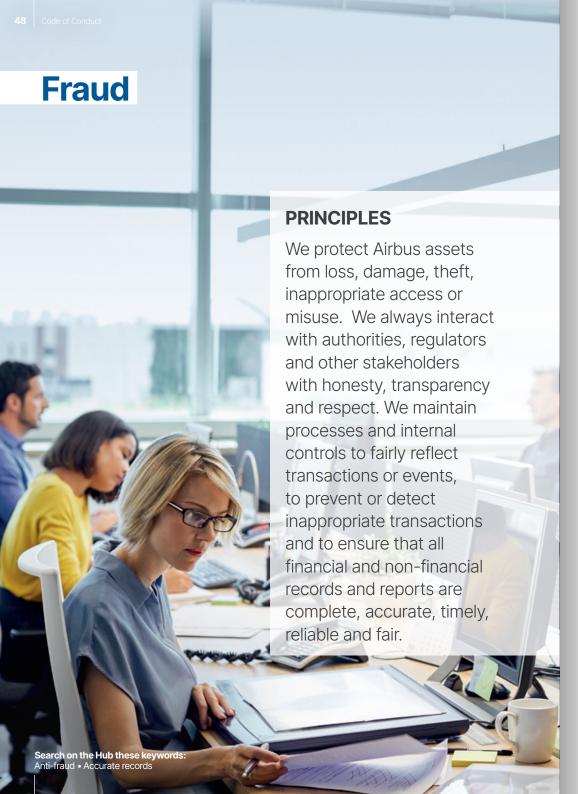
Speak-up if we have any information suggesting that a third party poses an ethical risk.

Take appropriate action if the behaviour of a third party goes against the principles of this Code.

We don't

Bypass company policy or attempt to engage a third party before the appropriate due diligence and procurement process is completed.

Use a third party to make any promises or payments that could not be made by Airbus itself.





Misusing company credit cards for nonbusiness expenses; lack of timely and accurate recording of costs and business expenses.



Purposely avoiding rules meant to prevent fraud (e.g., application of the "four-eves" principle to avoid exposure to phishing scams).



Giving false information, leaving out important details or modifying records to mislead others, or helping someone else to do it.

We do

Correct identified errors honestly and quickly; speak up if you notice any issues with the accuracy of records or reports.

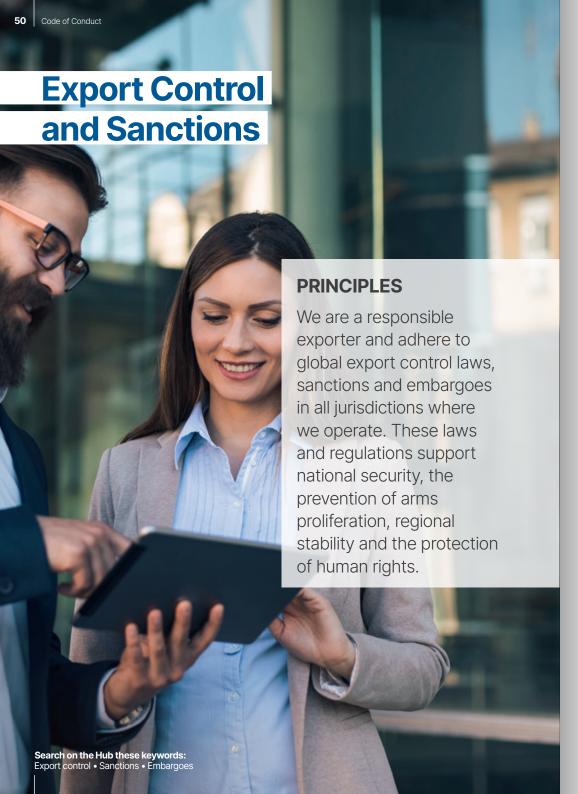
Follow the procedures and controls for properly purchasing, storing, moving, using and disposing of Airbus assets, and comply with all laws and regulations regarding the preservation of documents and records.

Stay vigilant to communication received from outside Airbus which can be used to commit fraud.

We don't

Falsify accounting or other business records, or allow or facilitate improper or insufficient disclosures to regulators, auditors or other authorities.

Misuse company resources for non-business purposes or unfair personal advantage.





Misclassifying goods, software or technology in order to avoid licence requirements.



Not taking export control regulations into account when travelling abroad with a laptop or downloading restricted material.



Agreeing to provide documentation to a customer without having received an appropriate end-user statement.



Not properly separating and securing digital and physical access to controlled materials for employees and subcontractors.

We do

Classify and mark tangible and intangible materials and get the proper authorisation before exporting.

Check transactions to ensure they comply with applicable sanctions and restricted-party lists and confirm that the end-use, end-user, and destination(s) are permitted.

Perform human rights due diligence when reviewing potential exports.

Stay vigilant and report any warning signs related to potential circumvention of sanctions or misuse of our products and services.

We don't

Export controlled items, including the granting of access to documents or data (including to company employees), without the necessary authorisations or licences.

Assume that only military items are subject to export control restrictions or sanctions.

Rely on information provided by third parties (e.g., classification or scope of a licence) without verifying key information and overall consistency.





Discussing and exchanging pricing conditions and other commercially sensitive information with a competitor.



Using the proprietary or confidential information of a third party that we accidentally received.



Providing unauthorised access to Airbus intellectual property or misusing it for personal benefit.

We do

Seek advice from Legal & Compliance before exchanging information or entering into any agreement with a competitor.

Safeguard and manage classified or proprietary information from customers or partners in accordance with applicable policies.

Secure and prevent unauthorised access to Airbus proprietary information when leaving a workspace or when working outside Airbus' premises.

We don't

Collect competitive intelligence through illegal means or by failing to identify ourselves as an Airbus employee.

Accept competitive intelligence obtained under unclear circumstances, from suspicious sources or through deception.

Engage in direct or indirect exchanges of commercially sensitive information with competitors, such as prices, pricing methods or policies, margins, terms or conditions of sale, production capacity or participation in tenders.

Engage in discussions about bid-rigging, price fixing, market or customer allocation.



Having a financial interest in a company or a close personal relationship with someone that does business with Airbus.



Hiring or supervising someone with whom you share a close personal relationship outside Airbus.



Maintaining employment outside Airbus (paid or unpaid) which could directly or indirectly conflict with Airbus' interests.



Giving preference to a supplier during a call for tender, because of personal or financial interests.

We do

Make sure that any circumstances that could give rise to a conflict of interest are disclosed and discussed with the Legal & Compliance team so they can assess the risk.

Define and document actions to mitigate the risk if a conflict of interest is confirmed.

Contact Legal & Compliance or your Human Resources Business Partner when you have a question related to conflict of interest.

We don't

Conceal information or selfmanage any actual or potential conflict of interest.

Place ourselves in the position of hiring or supervising a family member or close personal friend.

Remain passive in situations where our personal interests could appear to influence business decisions at Airbus.

Insider Trading



Mustrative risks



Buying or selling Airbus shares when we are aware of yet-to-be released quarterly financial results (e.g. revenue, earnings, cash flow, charges or other financial results or forecasts).



Sharing, even inadvertently, non-public information (such as monthly orders and deliveries, production or cost targets. significant claims or investigations, or changes in senior leadership) with someone who could use it for trading.



Buying stock in a company that Airbus is planning to merge with or acquire, before the deal has been announced.

We do

Maintain the confidentiality of any non-public information in order to avoid any accidental disclosure.

Familiarise ourselves with and follow the Airbus Insider Trading Rules, including the prohibition on trading Airbus shares during designated "No-Trading Periods" for certain senior-level employees.

Be cautious to prevent accidental leaks of information; an unintentional act can still result in a violation of applicable insider trading laws.

We don't

Buy or sell Airbus securities or those of any other company if we have inside information at the time of the planned transaction.

Discuss inside information with anyone outside the company, including friends and family.

Ask others to make transactions on our behalf when we ourselves are not permitted to do so.





Disguising the source of wealth or source of funds.



Allowing payments that are inconsistent with a customer's business or involve unusually complex deals or payment structures.

We do

Follow Know Your Customer (KYC) / Know Your Supplier (KYS) policies to ensure all parties are screened against watchlists and receive timely due diligence.

Take reasonable steps to understand and identify the third party's source of wealth and beneficial owner, i.e. the individual with ultimate effective control over the legal entity.

Watch for red flags related to money laundering or tax evasion, including the location of bank accounts to which we make payments or from which we receive funds (e.g. the counterparty's bank should be located in their country of residence or business operations).



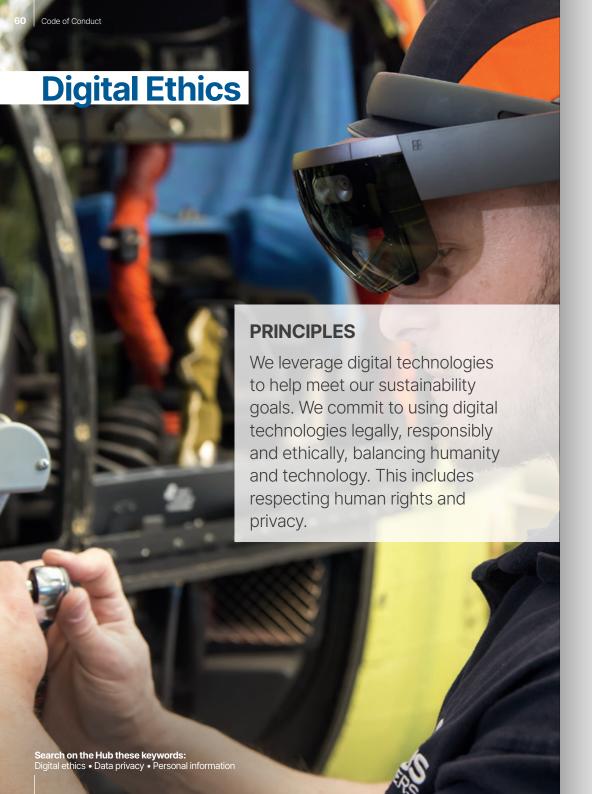
Working with a third party that diverts payments through a tax haven in order to avoid declaring taxable income in their country of residence.

We don't

Accept payments from entities other than the customer with which we have a contractual relationship without prior approval.

Agree to issue refunds to a bank account that is not the bank account from which the original payment was made.

Enter into agreements in which the contractual arrangements, financial elements or corporate structures are opaque or insufficiently documented.





Deploying an artificial intelligence system without informing the users, and without explaining its purposes, inputs and outputs.



Collecting personal information without informing the person involved, and using it for other purposes than those stated.



Sharing personal information with people who have no legitimate reason to have access to this information.



Using technology to spread false or harmful information.

We do

Design and use digital technologies with ethics and privacy in mind, respecting individuals.

Take measures to protect the personal information we manage and share.

Regularly review artificial intelligence systems to ensure fairness and prevent biases.

Gather only the personal information needed for the specific purpose and keep it only as long as necessary.

We don't

Use artificial intelligence to make decisions about personal, moral or political issues.

Use or share Airbus data or third-party data without appropriate protection.



Our conduct shapes the future



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