

This Statement has been published in accordance with the UK **'Modern Slavery Act 2015'**, the Australian **'Modern Slavery Act 2018 (Cth)'** and the Canadian **'Fighting Against Forced Labour and Child Labour in Supply Chains Act'** (2023). It sets out the steps taken by Airbus SE during the financial year ending 31 December 2024 to prevent modern slavery, including human trafficking, forced and child labour in its business, operations and supply chain, and the proposed actions to support this going forward.

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## Our approach and progress to date

Modern slavery, including servitude, forced and child 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'**, the Australian **'Modern Slavery Act 2018 (Cth)'** and the Canadian **'Fighting Against Forced Labour and Child Labour in Supply Chains Act'** (together "the Acts").

This Statement covers the following UK, Australian and Canadian entities<sup>1</sup> which fall within the scope of at least one of the Acts: Airbus Operations Ltd, Airbus Defence and Space Ltd, Airbus Helicopters UK Ltd, Airbus Australia Pacific Ltd, Airbus Helicopters Canada Ltd, Airbus Atlantic Canada SL Inc, Airbus Atlantic Canada Inc, Airbus Canada Limited Partnership, Airbus Canada Managing GP Inc and their subsidiaries.

<sup>1</sup> Airbus Operations Ltd (03468788); Airbus Defence and Space Ltd (02449259); Airbus Helicopters UK Ltd (01164090); Airbus Australia Pacific Ltd (ACN 003 035 470); Airbus Helicopters Canada Ltd (166686-0); Airbus Atlantic Canada SL Inc (1175203075); Airbus Atlantic Canada Inc (1167566406 Quebec), Airbus Canada Limited Partnership (3371496384) and Airbus Canada Managing GP Inc (1171482103).

# Airbus SE Modern Slavery Statement

including fighting against  
forced and child labour

Year ending 31 December 2024

The Company's human rights ambition is to 'embed and advance respect for human rights throughout its business, operations and supply chain'.

As such, the Company is committed to upholding fundamental human rights taking into account the following international standards and principles:

- International Bill of Human Rights, consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- OECD (Organisation for Economic Cooperation and Development) Guidelines for Multinational Enterprises on Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Business Conduct
- Ten Principles of the UN Global Compact, of which Airbus has been a signatory since 2003

Actions towards assessing and addressing modern slavery risks related to the Company's business, operations and supply chain, continued during 2024 and are described in this Statement. This included engaging with its subsidiaries on areas of risk.

**For the purposes of the Australian Modern Slavery Act 2018 (Cth)**, Airbus Australia Pacific Ltd is a wholly owned subsidiary of Airbus Helicopters SAS 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 13 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.

**For the purposes of the Canadian 'Fighting Against Forced Labour and Child Labour in Supply Chains Act'**, Airbus Helicopters Canada Ltd is a wholly owned subsidiary of Airbus Helicopters SAS; Airbus Atlantic Canada SL Inc and Airbus Atlantic Canada Inc are wholly owned subsidiaries of Airbus Atlantic SAS; Airbus Canada Limited Partnership is a joint venture controlled by Airbus SE and Investissement Québec, an entity of the Québec government. Airbus Helicopters Canada Ltd, Airbus Atlantic Canada SL and Airbus Atlantic Canada Inc are, in turn, part of Airbus SE.

Headquartered in Fort Erie, Ontario, with around 250 employees, Airbus Helicopters Canada Ltd markets and manufactures rotorcraft and performs dynamic component repair for the light helicopter product range worldwide.

Headquartered in Mirabel, Québec, the Airbus Atlantic Canada group has approximately 600 employees via its two entities, Airbus Atlantic Canada SL Inc and Airbus Atlantic Canada Inc. Both entities are wholly-owned Airbus Atlantic SAS subsidiaries and specialise in aerostructure assembly and systems integration.

Headquartered in Mirabel, Québec, Airbus Canada Limited Partnership employs approximately 3,500 employees and is responsible for the A220 aircraft family development and manufacturing. The Limited Partnership is acting through its managing general partner, Airbus Canada Managing GP Inc, also headquartered in Mirabel, Québec.

## Our business and governance

### Our business

The Company is driven by its purpose: to pioneer sustainable aerospace for a safe and united world. This pioneering spirit has powered the Company for more than fifty years, propelling it to a leading position in the aerospace industry and positioning it for the long-term.

The Company operates in three segments: Airbus (which includes the Commercial Aircraft business) and the two divisions, Airbus Defence and Space and Airbus Helicopters.

In Commercial Aircraft, Airbus designs and manufactures modern and fuel-efficient airliners and associated services. Airbus is also a European leader in space systems, defence and security. In helicopters, Airbus provides efficient civil and military rotorcraft solutions and services worldwide.

Airbus SE itself does not engage in the core aerospace, defence or space business of the Company. However, as the parent company, Airbus SE conducts activities which are essential to the Company's activities and which are an integral part of the overall management of the Company. In particular, Airbus SE sets and controls objectives and approves major decisions of the Company, including by coordinating related businesses, providing services or procuring the provision of services to its subsidiaries, and pursuing financing activities in support of the business activities and strategy of the Company.

### Our governance

Under the Board Rules, the Board of Directors delegates the execution of the strategy (as approved by the Board of Directors) and the day-to-day management of the Company to the Chief Executive Officer (CEO), who, supported by the Executive Committee (EC) and its executive leadership team, makes decisions with respect to the management of the Company.

In order to properly inform or involve the Board of Directors and the EC, the Company has defined dedicated supporting governance and organisation at the highest level. Oversight has been established at the Board of Directors level, with the Ethics, Compliance and Sustainability Committee (ECSC).

From 1 January 2024, the Company further strengthened sustainability-related activities with the creation of a Chief Sustainability Officer (CSO) position. Hence, Julie Kitcher has been appointed Chief Sustainability Officer and Communications and remains a member of the EC. Her role includes ensuring the proper information to and the involvement of the Company's EC and the ECSC on sustainability matters.

The ECSC meets quarterly and is responsible for assisting the Board of Directors to oversee the following:

- Culture and commitment to ethical business, integrity and sustainability;
- Ethics and Compliance programme, organisation and framework; and
- Sustainability strategy and effective governance in order to ensure that sustainability-related topics are taken into account in the Company's objectives and strategy.



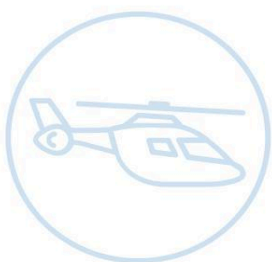
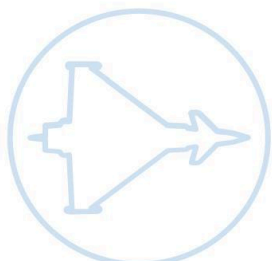
The EC is supported by several committees or boards that, amongst other things, steer related topics and oversee performance, results and effectiveness of policies, actions plans and progress:

- The Sustainability Strategy Committee, which reviews sustainability performance and progress at least once a year aims to ensure alignment across all sustainability topics. It is co-chaired by the CSO and Head of Strategy; and
- The Steering Committees of the Human Rights and Sustainable Supply Chain Roadmaps, both sponsored by EC members.

A Human Rights Core Team, made up of multi-divisional and multi-functional representatives from throughout the Company, drives the main actions of the Human Rights Roadmap, including in relation to its identified salient issues which address impacts across the value chain.

Due to the transverse nature of human rights topics, various functions are responsible for managing compliance with the relevant commitments outlined within the Company Human Rights Policy (see 'Our policies' section) and developing measures to support implementation, including the assignment of roles and responsibilities within their own organisation and provision of resources to conduct risk-based due diligence.

Other networks within the Company that support implementation and compliance include for example, the Ethics & Compliance Representatives Network, the Privacy Network, the Sustainability National Representatives and Ambassador Network and the Inclusion and Diversity Network.



## Our supply chain

The Company relies on a global supply chain, composed of the suppliers with which the Company contracts supply agreements (Tier-1), and the suppliers of these Tier-1s (subtier suppliers). It sources services and products from thousands of suppliers worldwide, including raw materials, engines, systems, aerostructure elements and fuselage sections. The Company's daily collaboration with its suppliers supports meeting quality standards and performance requirements. Long-term contracting or partnerships also help reduce inflow risks, including related to the timely delivery of components. The active role of its suppliers will be essential for the aviation sector's decarbonisation ambitions and for the Company sustainability journey more broadly. Accordingly, the Company has implemented policies and defined engagement plans that are led by its Sustainable Supply Chain Roadmap.

While 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. The Company has established regional procurement offices in North America (Herndon, Virginia), India (Bangalore), Asia Pacific (Singapore), China (Beijing) and Africa / Middle East (Dubai) to support local procurement initiatives. The regional procurement offices represent the Procurement function in the respective regions. They are responsible for strategic sourcing, general procurement and supplier development (procurement operations) while supporting the application of the Company's procurement processes, policy and digital solutions.

The Company strives to make environmental and social responsibility a core element of its procurement strategy. This includes managing the relationships with suppliers through the different phases of the procurement process: sourcing strategy definition, supplier selection, contract management and supplier monitoring and development.

The Company's Sustainable Supply Chain Roadmap is based on a three-step approach: supplier commitment, supplier assessment, supplier engagement and development. This approach is aligned with the Company's due diligence approach (see 'Our due diligence' section) and includes: supply base risk mapping, supplier engagement and contractual requirements, supplier assessment/audits and development plans, policies, tools and reporting.

The depth of the Company's supply chain increases the complexity and, in many areas, the difficulty of identifying and addressing impacts both actual and potential. For instance, reliable information related to the precise mining sites that provide materials incorporated by an upstream sub-tier supplier, combined with other materials, into a component of the Company's products may be complicated to identify, collect and analyse, such as the smelters of raw materials that may end up in certain components that are installed on the Company's products.

Furthermore, systemic issues of work-related rights may potentially exist, to the extent the Company's sourcing footprint includes countries and regions with differing labour standards and potentially varying levels of labour law enforcement, as well as certain activities or commodities, such as the sourcing of raw materials.

For further information, see the **Airbus SE Report of the Board of Directors 2024** [here](#)



## Our policies

Key Company policies have clear expectations towards its own operations and suppliers:

- Airbus Code of Conduct
- Airbus Company Human Rights Policy
- International Framework Agreement
- Airbus Supplier Code of Conduct

All of the Company's controlled affiliates are expected to deploy similar internal policies by applying the Company's directives. Through a company-wide single digital handbook, the controlled affiliates access the applicable requirements they are expected to comply with, including relevant supporting materials and methods designed to support them in their operational implementation. Its enforcement is supported by the Directors' training programme, as well as on-boarding sessions performed for newly appointed managing directors of controlled affiliates.

### Airbus Code of Conduct

By defining expectations and standards in regards to ethical behaviour and responsible business practices, the Airbus Code of Conduct guides employees and supports the prevention of unethical business conduct. It addresses a range of social, environmental and governance topics, including but not limited to corporate culture, protection of whistleblowers, bribery and corruption, and relationships with third parties.

The Code of Conduct is applicable to the Company's global workforce, including all divisions and controlled affiliates or joint ventures.

The **Airbus Code of Conduct** can be found on Airbus.com [here](#)



### Airbus Company Human Rights Policy

The Airbus Company Human Rights Policy outlines the Company's expectations towards respecting human rights and preventing adverse human rights impacts including through governance, undertaking ongoing human rights due diligence, stakeholder engagement, access to grievance mechanisms, and regular monitoring including by top management.

The Company's policy commitments are being embedded throughout the Company through a Sustainability Due Diligence and Human Rights Directive which defines and establishes a set of Company business requirements. These business requirements will be integrated into the Company's Business Management System and be supported by methods, processes and guidance. Internal capacity building, including training and awareness raising, will also support adherence.

The policy covers various aspects such as forced labour including modern slavery and human trafficking, child labour, migrant workers, social dialogue and freedom of association including collective bargaining, remuneration, working time, occupational health and safety, inclusive workplaces, harassment, data privacy, community impacts, products

and services including product safety, and supplier engagement.

It applies to all Company employees worldwide, including in divisions and controlled affiliates, and encourages non-controlled affiliates to adopt similar standards. It also covers contractors whilst on premises of the Company or at work under the responsibility of the Company.

In addition to the third party social assessment process (see 'Our due diligence' section), implementation of the policy is primarily monitored through mechanisms being established in the Company's Business Management System, such as the process to Manage Company Performance, including the definition of objectives, regular performance reviews and the execution of corrective actions in case of deviations from target.

The policy was developed with input from internal and external stakeholders, including divisional and functional representatives of the Human Rights Core Team and Steering Committee, members of the Legal & Compliance team, human rights experts, academics, and civil society. It was also discussed at the Airbus Global Forum and the Societas Europaea Works Council, which represents the Company's European social partners. The Airbus Human Rights Policy Statement is publicly available on the Company website.

For further information, see the **human rights page** on Airbus.com [here](#)



### International Framework Agreement

The International Framework Agreement (IFA) reaffirms the Company's willingness to respect the regulations regarding fundamental human rights, equal opportunities, free choice of employment, as well as prohibition of forced and child labour and respect for the conditions for social dialogue. It also prioritises health and safety through a proactive occupational health and safety and risk prevention system. The Company prohibits any type or threat of physical and/or psychological abuse in the workplace and strives to contribute to workers' social welfare, medical care, and long-term disability coverage. The Company intends, via its agreements, to respect the disposition of the following ILO Conventions:

- Discrimination, employee and occupation (No. 111)
- Equal remuneration (No. 100)
- Workers' representatives (No. 135)
- Forced labour (No. 29)
- Abolition of forced labour (No. 105)
- Child labour (No. 182)
- Minimum age (No. 138)
- Freedom of association and protection of the right to organise (No. 87)
- Right to organise and collective bargaining (No. 98)

The commitments under this agreement have been integrated into the formalisation of Company-wide policies such as the Airbus Company Human Rights Policy and the Human Resources Airbus Company Policy which are providing guiding principles for business conduct at the Company.





The scope of the IFA is company-wide, with accountability resting with the Chief Human Resources Officer.

The IFA was developed and agreed through multistakeholder collaboration between the Company, the European Works Council, European Metalworkers' Federation, and International Metalworkers' Federation and is publicly available on the IndustriAll Global Union website.

## Supplier Code of Conduct

The Company requires that all business shall be conducted by suppliers in compliance with applicable law and regulations as well as the principles of the Airbus Supplier Code of Conduct (SCoC), which is the document of reference for the Company's responsible supplier management.

The SCoC is based on the International Forum on Business Ethics (IFBEC) Model Code of Conduct and integrates company-wide values and principles, in line with internationally recognised standards and conventions such as UNGPs, OECD and the ILO.

All suppliers are asked to sign a confirmation of commitment with the principles of the SCoC (or to confirm that their own practices are aligned) and to cascade these principles throughout their own supply chains. It is a mandatory commitment for any supplier participating in an Airbus call for tender.

Suppliers are also expected to implement due diligence processes to detect, prevent, and address potential impacts including related to health and safety, forced and child labour and broader human rights commitments and to apply remediation of any identified adverse impacts.

The SCoC also formally requires suppliers to comply with applicable laws and regulations on conflict minerals, including any 3TG (tin, tungsten, tantalum and gold) conflict minerals, and establish a policy and a management system to ensure responsible material sourcing, in line with the Company's Responsible Mineral Policy published on its website. Indeed some minerals, including 3TG, are necessary for the proper functioning of components within its products; the Company directly imports minerals in extremely low volumes, however, such minerals are found in certain products the Company procures.

The Company monitors adherence to the commitments and expectations of the SCoC through ongoing due diligence to identify and mitigate or prevent any adverse impacts related to its activities including in relation to workers in the value chain. This approach is aligned with the OECD Due Diligence Guidance for Responsible Business Conduct and is further detailed in the 'Our due diligence' section.

The **Supplier Code of Conduct** can be found on [Airbus.com](#)

[here](#)



## Our due diligence

The Company has established processes to conduct sustainability due diligence throughout its business, operations and supply chain to identify and address the adverse impacts (direct and indirect) of its business activities.

This is an ongoing, iterative and progressively in-depth exercise, with the amount and depth of due diligence commensurate with the severity and likelihood of an adverse impact, where more significant ones (based on severity) are prioritised.

The approach taken by the Company in this respect takes into account the UNGPs and the OECD Due Diligence Guidance for Responsible Business Conduct, which covers six steps including:

1. Embedding responsible business conduct
2. Identifying and assessing potential and actual impacts
3. Acting to address, cease, prevent, mitigate or avoid adverse impacts
4. Tracking performance including use of appropriate KPIs and targets
5. Communicating and reporting on findings and performance
6. Cooperating in appropriate remedies

## Due diligence in our supply chain

Ensuring respect for human rights, including health and safety, the environment and ethical business conduct principles is embedded into how the Company selects, onboards and contracts with its suppliers. This includes different sustainability screening and checks at different stages of its engagement with suppliers:

- Prior to being engaged, all the Company's suppliers are screened for risks, including related to human rights, the environment and ethical business conduct, via a third party supplier screening tool. If a 'red flag' is highlighted for a supplier, an internal review will take place which may result in escalation depending on the severity of the alert.
- During the call for tender stage, for certain large contracts above a minimum threshold, suppliers are required to complete a sustainability questionnaire to help the Company evaluate their sustainability maturity.
- The Company's standard procurement contract templates have evolved to reinforce clauses related to human rights and the environment. These include requirements for the Company's suppliers to comply with applicable laws and regulations in connection with human rights, labour and employment, environment and health & safety, to commit to apply (and cascade throughout their own supply chains) the principles of the Airbus SCoC and to comply with other requirements such as to cooperate with a request for an evidence-based desktop Sustainability Maturity Assessment (SMA)<sup>2</sup> and/or on-site assessment conducted by a third party service provider.
- Once a contractual relationship has been established, the Company identifies supplier sites with the highest human rights, environmental and business conduct risks through the application of a risk-based analysis of both the supplier's geographical location and nature of their

<sup>2</sup> Whilst all Company suppliers, including suppliers of the Company's controlled affiliates, are part of its supply chain due diligence (onboarding, ad hoc and informal alert reporting), currently only Tier-1 suppliers of core entities are covered through the sustainability questionnaire, SMA and risk-based supplier analysis through in situ contractors, and on supplier sites.



activity using publicly available indices. Following this analysis, suppliers identified as high risk are required to complete an evidence based SMA undertaken through a third party service provider. This assessment covers topics such as labour and human rights, health and safety, environment, ethics and sustainable procurement.

- Following completion of an SMA, if a 'red flag' is raised - i.e. the Company's sustainability expectations are not met, and depending on the severity of the risk, the supplier will be requested to prepare an appropriate action plan to demonstrate how they will cease, mitigate or prevent the identified risk, or the supplier may be required to undertake an on-site assessment by a third party service provider. Actions may also involve coordination/collaboration with sector-specific or cross-sector initiatives as appropriate.
- If the Company does not consider that the action plan is sufficiently progressing, or if actions are insufficient to prevent or minimise the risk, then the contractual relationship with that supplier may be reviewed.

The Company also monitors supplier risk on an ongoing basis through its OpenLine grievance mechanism (see section on 'Processes and channels to raise concerns and remediation') and informal channels such as external reports (media/NGO reports) as well as through visits to supplier sites.

If the Company receives substantiated knowledge of a violation of a human rights or an environmental-related obligation, it will investigate, without undue delay, to understand the severity and scale of the violation as well as any required mitigation actions.

This investigation will normally take place through engagement with the relevant supplier. After investigation, and depending on the severity, the supplier could be asked to propose follow-up actions as described above or the Company may require an on-site assessment.

For any alerts identified associated with the supply chain of a supplier, the Company will, as a priority, require action to be taken via its supplier and will monitor for implementation of relevant actions.

The Company has set a target to ensure that its most risky supplier sites are covered by at least one dedicated action (see table at top of page). This can include undertaking an SMA conducted by a third party service provider, an on-site assessment or other targeted action. The scope of this target is based on the most risky suppliers identified using risk-based analysis, as described above. This inherent risk mapping is performed on Tier-1 suppliers, excluding those of affiliates and subsidiaries.

Assessments conducted on the Company's supplier sites	2024
Sourcing volume having undergone an SMA	86%
Number of high risk suppliers having undergone an SMA	305
Number of onsite assessments conducted on supplier sites	50

## Due diligence in our own operations

Expectations related to workers in the Company's own operations are set out in the Airbus Company Human Rights Policy (see 'Our policies' section).

The Company regularly checks adherence to international standards and principles, minimum legal obligations and its own commitments through on-site assessments, focused on human and labour rights, conducted on its own sites including the sites of its controlled affiliates.

These assessments are conducted by a third party service provider, consistent with that used for its supply chain, and sites are prioritised based on the same analysis of risk including geographical location. See table below.

The assessments include a documentation review (including those of any suppliers based on that site) as well as interviews with direct employees and in situ contractors.

Any findings raised are discussed with the site's management team (or at Company level if the finding relates to company-wide actions) and action plans for addressing the findings are agreed, which includes any appropriate remediation and integration of lessons learnt such as repeated findings which may require root cause analysis and systemic changes. Any findings identified in relation to the suppliers working on a Company site will also trigger an action plan. The Company aims to close all site findings without undue delay.

In addition, all employees of the Company as well as onsite contractors are encouraged to report any alerts of concerns through the Company's grievance mechanism (see section on 'Processes and channels to raise concerns and remediation').

## Ad hoc due diligence

The Company is committed to conducting ad hoc due diligence when it expects a significantly changed or significantly expanded risk situation in its own business area or that of a Company's supplier, including due to the introduction of significant new products, projects or business fields.

Social assessments conducted on the Company's own sites	Unit	Target Year	Target Value	2024 Value
Assessment of all Company sites, including controlled affiliates with more than 100 employees, for human and labour rights, since 2020	%	2026	100%	<b>70%</b>
Number of annual on-site social assessments performed	No.	2024	15	<b>15</b>
Number of assessments performed since 2020	No.			<b>69</b>

**Scope:** The scope of this target includes the Company's own sites and in situ contractors.

**Countries of sites assessed in 2024:** Spain, Germany, France, UK, Portugal, Poland, Hungary, Tunisia, Romania, Thailand, Taiwan and the USA.

**Methodology and assumptions:** The baseline for these social assessments is based on 2020 data. There have been no changes in the target and corresponding metrics or underlying measurement methodologies, significant assumptions, limitations, sources and adopted processes to collect data versus 2023.

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 (ICSA) process, were also considered. Relevant legislation was also taken into account.



## Identifying and addressing adverse impacts

### Salient issues

The Company is committed to identifying and addressing its salient issues, through ongoing monitoring of actual or potential internal and external adverse impacts, including within its supply chain, and engagement with key internal and external stakeholders.

Taking into account that salient issues may change over time due to internal and external influences, the Company is committed to reviewing them on a regular basis. This includes an annual review to identify any new issues that may need prioritisation, a comprehensive and more in depth review conducted every three years and ad hoc assessments as required.

The methodology used by the Company for identifying its salient issues is based on the UNGPs and includes an assessment of actual or potential adverse impacts in terms of severity (scope, scale, irremediability), likelihood, relationship and level of influence to inform prioritisation. The results of this analysis are reviewed by both internal and external stakeholders, prior to final validation at EC level.

All identified salient issues, including their associated potential adverse impacts, are recorded through the Company's Enterprise Risk Management (ERM) system and governance follows a similar process as the one existing for the Company's top company risks. For example, sponsorship of each salient issue is at EC level with nominated salient issue owners who have responsibility to develop and implement action plans as well as setting measures of effectiveness.

Reporting on the progress of actions to the EC is conducted at least once per year, including during the ERM presentation of top company risks, as well as through relevant steering committees and other Risk & Opportunity Boards at functional and divisional level.

Through the salient issue identification process, the Company has developed an understanding of how workers with particular characteristics, those working in particular contexts, or those undertaking particular activities may be at higher risk of harm. This analysis took into account publicly available indices supporting the identification of geographies or commodities or nature of activities where there may be higher risk, including related to health and safety and/or child/forced labour. From that analysis, dimensions and characteristics that appeared relevant for the Company as differentiating factors for workers in the value chain to be potentially more impacted are identified as follows:

- Forced labour: supply chain workers, including in situ contractors, particularly migrant workers (both foreign and domestic). Security and cleaning services as commodities, are considered particularly at risk of forced labour.
- Child labour: supply chain workers, particularly those engaged in the sourcing of raw materials.
- Health and safety: supply chain workers, including in situ contractors.

For each of these potential adverse impacts, the Company prioritises high risk countries and activities through the application of a risk-based analysis of both the supplier's geographical location and nature of their activity using publicly available indices.

### Addressing actual impacts

The Company's due diligence efforts undertaken during 2024 did not identify any findings related to child labour. However, the Company identified indicators of forced labour. Details follow:

Following a third party onsite audit triggered by a visit to a supplier site, indicators of forced labour were found on a supplier site in Southeast Asia.

This included allegations of worker-paid recruitment fees and excessive working hours. Since identification, the Company has been working with the supplier to clarify the alleged findings, including with the support of external stakeholders to support guidance and worker interviews.

Following positive collaborative discussions with the supplier, all findings are in the process of being closed and the Company is following up closely and supporting the supplier in this respect.

Whilst the additional worker interviews clarified that no worker-paid recruitment fees were required to be repaid, remedial actions undertaken by the supplier include strengthening its policies, processes and guidance related to worker-paid recruitment fees and working hours in consideration of international labour standards.

The findings will be formally closed following a third party closure audit.

### Actions to cease, mitigate or prevent adverse impacts

During 2024, the Company continued to develop action plans relating to ceasing, mitigating or preventing actual or potential adverse impacts.

The Company will continue to progress actions during 2025. Details follow:

- Mitigating the risk of forced labour. The Company continued to monitor sites in its higher risk countries in particular for indicators of forced labour, and to develop actions related to mitigating the risk of forced labour on its own sites. This includes actions to review and strengthen policies and processes throughout the procurement process, including at the onboarding stage for in situ contractors, and monitoring. This activity is focused on high risk activities such as cleaning, security and catering in high risk countries for forced labour based on publicly available indices. In addition, the Company has produced an internal Forced Labour Toolkit to support identification of indicators and steps for prevention of forced labour, as well as introducing a workshop focused on identifying human rights impacts - both of which are primarily aimed at exposed buyers and supply chain quality managers.
- Mitigating risks of child labour related to sourcing of raw materials. During 2024, the Company continued to deepen its understanding of the potential human rights impacts related to its sourcing of raw materials, which are also of particular relevance in its transition to decarbonisation. The objective of this ongoing action is to prioritise the materials (minerals and metals) used in the Company's products which are identified as high risks for human rights, including for child and forced labour, and health & safety. Once identified, the Company aims to review appropriate actions to either cease, prevent or mitigate such risk.



## Processes and channels to raise concerns and remediation

The Company enables employees and third parties – including but not limited to contractors, subcontractors, direct or indirect suppliers, customers, end-users and local communities around Company's sites and those of its suppliers – to speak-up about concerns related to the Company. Concerns may be raised through various channels, including through the OpenLine. The OpenLine enables people to submit an alert securely and confidentially.

If preferred, employees may also report concerns to line managers, Human Resources Business Partners, a member of the Legal & Compliance team, Ethics & Compliance Representatives, Privacy Focal Points, or Export Control Points of Contact.

The Airbus OpenLine is available both online and through a dedicated telephone number. A concern can be reported anonymously in all locations where legally permissible. If an alert is received through OpenLine, the Company commits to acknowledge receipt of the report within seven days. All alerts of concern are handled by professional investigators with the assistance of subject matter experts where required.

The Company's employees are made aware of speak-up channels as part of mandatory annual training, company-wide communications on the Company's intranet, poster campaigns in work sites, annual team talks, and other periodic communications. Employees' knowledge of and trust in the Company's treatment of 'Speak Up' is assessed during the periodic 'My Working Environment' survey offering insights on its effectiveness.

Details of OpenLine are also available on the front page of the Company website, including on the 'contact us' section. They are also communicated to suppliers through the Airbus SCoC. The Company also aims to ensure that in situ contractors are aware of its processes for raising concerns by embedding communication channels within its operations.

The **Airbus OpenLine** can be found [here](#)



## Protection from Retaliation

The Company is committed to protect anyone from retaliation, direct or indirect, towards anyone who raises questions or concerns in good faith or assists in investigations of suspected violations. The Company's non-retaliation principles are defined in a specific policy which provides a comprehensive guide on preventing, detecting and remedying retaliation.

Knowing that the risk of retaliation is heightened during investigations, it is the responsibility of the investigator to pay special attention to the risk of retaliation and they, among other things, must communicate the Company's policy regarding non-retaliation to any reporter. Protection from retaliation is also noted as a key principle in the Airbus OpenLine policy and the Company's internal Method for Investigation of Compliance Allegations.

A multi-functional team, including members from Legal & Compliance, the Human Rights Roadmap and the Procurement Sustainability teams, are updated on a regular basis on any new alerts or findings resulting from its due

diligence activities which require action, as well as the progress and outcome of key investigations. Any investigations include engagement and involvement of impacted rightsholders and other stakeholders as required.

## Remediation

If the Company identifies (including through investigations or other means), that it has caused or contributed to an actual adverse impact within its own operations, supply chain or other third party business relationship through its business activities, it will endeavour to address such impacts by providing for or cooperating in appropriate remediation. This includes seeking to restore the affected person or persons to the situation they would be in had the adverse impact not occurred (where possible) and enable remediation that is proportionate to the significance and scale of the adverse impact, including in cooperation with relevant stakeholders.

## Tracking and measuring effectiveness

Tracking and measuring the effectiveness of its actions, including through the definition and setting of KPIs and targets, is a key element of the Company's due diligence process, including to support continuous improvement. It aims to assess the effectiveness of its actions, integrating feedback on lessons learnt to enhance due diligence practice, and accounting for how the Company addresses its impacts and the results of such actions to individuals or groups who may be impacted and other stakeholders including through reporting.

Tracking and measuring effectiveness are included in, for example, the actions of the Company's human rights and environment roadmaps, its training programmes, the assessments conducted in its supplier sites and own sites, with targets set for the closure of findings and the effectiveness of its grievance mechanism. Relevant targets and KPIs are a part of the Company's internal reporting and are regularly monitored including by the relevant roadmaps and steering committees as well as at EC level. These, together with their associated policies, are integrated into relevant management systems and governance, as described above, and that ensure adequate reliability and topic management.

## Stakeholder engagement and collaboration

Engaging with stakeholders and ensuring their interests, views and rights are taken into account, helps the Company make informed decisions based on an improved understanding of any impacts it may cause, contribute to, or be directly linked with.

Considered stakeholders include those who have been, or could be, adversely impacted through the Company's business activities and/or their relevant proxies. Where appropriate, the Company will engage with a range of civil society, peers, specialists and other stakeholders, including those representing rightsholders and where possible with rightsholders directly, and including on human rights issues, and will seek feedback on performance.

To support its actions in this respect, the Company is also a member of the Global Business Initiative for Human Rights, the Responsible Business Alliance and the Responsible Mineral Alliance.





The Company is also an active member of industry trade associations which regularly hold focused discussions on managing human rights and environmental-related risks within the aerospace and defence industry. These include the IAEG (International Aerospace Environmental Group), BDLI (German Aerospace Industries Association), 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), TEDAE (Tecnológicas de Defensa, Seguridad, Aeronáutica y Espacio), GICAT (Groupement des industries françaises de défense et de sécurité terrestres et aéroterrestres) and TechUK (the UK's technology trade association).

The Company is a founding member of the IAEG, which is working on development and promotion of common aerospace industry standards and tools to help manage environmental obligations and deploy best practices. In 2022, and co-led by the Company, a contract was established between IAEG and its selected service provider to build a sectoral approach for supplier assessment which started to be deployed in 2023 and continued to be deployed in 2024. Taking part in this IAEG voluntary sectoral framework for Environment, Social and Governance (ESG) engagement strengthens business resilience and optimises resources and costs for suppliers.

In addition, an update of the Company's sustainability approach (including environment, human rights and health and safety) is regularly presented to key internal stakeholder groups, including the Airbus SE Works Council comprising social partners from across Company's European sites, and provides dedicated time for open dialogue and exchange.

## Training and capacity building

Training solutions are provided to all employees to promote awareness of human rights and the environment and to enable their integration into business processes and decision making.

Employees identified as working in areas where human rights are considered high risk are being equipped to address human rights as appropriate to their role linked to competency requirements.

For example, this includes buyers and supply chain quality managers working in high risk geographical locations / activities on human rights.

In addition, the Company will endeavour to support suppliers to access topic-specific training as required if any risks are identified related to human rights or the environment.

## Social dialogue

Policies previously described (Airbus Company Human Rights Policy, IFA, Airbus Supplier Code of Conduct and the Code of Conduct, see 'Our policies' section), cover the topic of collective bargaining and social dialogue.

Employee relations are underpinned by the Company commitments made in the Company's Code of Conduct and IFA, signed in 2005.

During 2024, the Company continued its commitment to fostering social dialogue at both national and local levels.

Meetings were held according to local requirements, facilitating exchanges between the management team and employee representatives.

The dialogue was developed locally throughout the year in accordance with the agreed planning and the needs to ensure collaboration and good activity.

The outcome of the dialogue with social partners at all these levels is an enhanced communication and collaboration within the organisation, fostering enhanced understanding by employees at all levels.

All actions are planned to mitigate risk and ensure the Company's success relies on effective social dialogue, freedom of association, and collective bargaining. All actions are ongoing and embedded in the Company's usual operations.

**This Statement has been approved by the Airbus SE Board of Directors and satisfies the requirements of the UK 'Modern Slavery Act 2015', the Australian 'Modern Slavery Act 2018 (Cth)' and the Canadian 'Fighting Against Forced Labour and Child Labour in Supply Chains Act'.** It has been signed by the CEO of Airbus SE who is a member of the Board of Directors as well as by the Company's CSO.

For the purposes of the 'Fighting Against Forced Labour and Child Labour in Supply Chains Act': "In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed."



Guillaume Fauray  
**Chief Executive Officer**

30 April 2025

"I have the authority to bind Airbus SE"



Julie Kitcher  
**Chief Sustainability Officer**

30 April 2025

For the **policies and codes** referenced within this Statement, see the

**Document Centre** on

[Airbus.com](https://www.airbus.com)

