

Airbus Company Policy

**Airbus
Anti-Corruption
Policy**

AIRBUS

Purpose

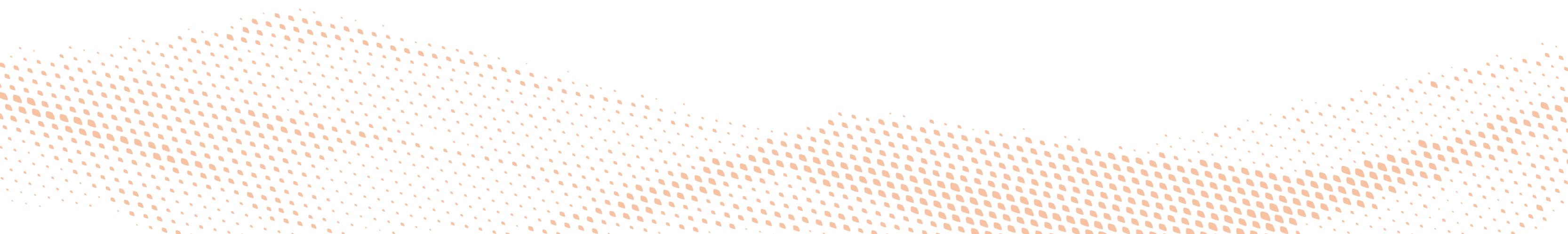
This Document defines the Airbus Anti-Corruption Policy. It ultimately provides employees with a single and unique reference and guide on its related matters.

Scope

This Document is applicable to all Airbus employees.



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1. Introduction

As a world leader in the aerospace and defence industry, Airbus is committed to conducting business ethically, and maintains a zero tolerance policy towards corruption of any kind, whether public or private, active or passive.

While the Airbus Code of Conduct provides guidance on common ethics and compliance issues in several areas, this Policy and the specific Directives referenced below form the backbone of our anti-corruption compliance programme. All Airbus employees and directors must conduct business with the highest standards of honesty, integrity and fairness in accordance with this Policy and the Directives referenced below. Third parties acting on behalf of Airbus are held to the same high standards of honesty, integrity and fairness, including through contractual provisions requiring compliance with relevant Policies and Directives and all applicable international anti-corruption laws.

2. What you should know: anti-corruption laws in a nutshell

As a responsible global company, Airbus must comply with the anti-bribery and corruption laws and regulations of every country in which it operates, which collectively prohibit any form of corruption, bribery or influence peddling. These anti-corruption laws — such as the French “Sapin 2” law, the UK Bribery Act and the US Foreign Corrupt Practices Act — are generally broad in their scope and application. They make it illegal for anyone to offer, promise, give, solicit or receive — directly or indirectly — money or “anything of value” to or from a Public Official or someone in the private sector in order to obtain or retain business or secure some other “improper advantage”.

Extra caution must be taken when interacting with Public Officials and their close family members. The laws of many countries treat

interactions with Public Officials differently from interactions with individuals in the private sector. In certain countries both public and private sector bribery and corruption is prohibited.

Violations of anti-corruption laws carry significant civil and criminal penalties, and put the reputation, hard work and business of Airbus and its employees at risk. Any employee who fails to comply with this Policy and the Directives referenced below will be subject to appropriate disciplinary action.



a. “Anything of Value” – A Bribe is More than Just Money

Anti-corruption laws make it illegal to offer, promise, give, solicit or receive “anything of value”, in exchange for an “improper advantage”. The term “anything of value” is broadly interpreted under the law. In addition of cash or money, which immediately come to mind, a bribe can also take other forms, all of which convey value to the receiver, for example:

- Providing luxurious or overly frequent gifts and hospitality to someone;
- Promising to pay for personal medical, educational or living expenses;
- Making sponsorships or donations to the “pet charity” of a public official;
- Extending employment or an unpaid internship to the relative of a key decision-maker;
- Offering an investment at below market value of a company controlled by a public official who would benefit personally.

b. “Improper Advantage” – A Bribe Can Be Given for Many Reasons

A bribe is generally offered with the expectation of receiving an “improper advantage” in return. The “improper advantage” can relate to a wide variety of matters, including:

- Obtaining, retaining or renewing a contract;
- Obtaining licenses or regulatory approvals;
- Preventing a detrimental action by a state or government authority;
- Obtaining a competitor’s bid information;
- Influencing a court or arbitration decision;
- Avoiding or reducing customs duties, taxes or fines.

c. Facilitation Payments

A “facilitation payment” is a small, unofficial payment to a low-level public official made to speed up or obtain a routine administrative process. Facilitation payments are typically requested to expedite visa applications, customs clearance, administrative procedures, etc. Consistent with most anti-corruption laws, Airbus prohibits facilitation payments. A narrow exception exists if a facilitation payment is made in the context of avoiding or preventing an imminent threat to the health, safety or welfare of an Airbus employee. In such cases, the employee should immediately inform a member of the Legal & Compliance team.

3. Our anti-corruption compliance programme

An effective Ethics & Compliance Programme is one that, by definition, continuously adapts to changes and improves over time. This starts with every Airbus employee, who are encouraged to speak up and make suggestions on how the company can enhance the implementation of its compliance processes and culture over time.

Airbus has developed an Ethics & Compliance Programme to mitigate the risk of bribery, corruption and influence peddling, relying on 3 pillars: Prevention, Detection and Remediation.

a. Prevention

A dedicated organisation

The Airbus Chief Ethics & Compliance Officer leads a dedicated team of Legal & Compliance professionals who are responsible

for performing risk assessments, drafting policies, conducting third party due diligence, investigating compliance allegations, implementing tools and controls and delivering compliance training, support and advice across the company.

The Ethics & Compliance Committee of the Board of Directors also plays a key role in the oversight and continued development of Airbus' Ethics & Compliance programme, organisation and framework for the effective governance of ethics and compliance, including all associated internal policies, procedures and controls.

In addition to the dedicated Legal & Compliance staff, Airbus has developed a network of part time Ethics & Compliance Representatives (ECRs), spanning all divisions, functions, and regions. Although the ECR network members are not compliance experts, they play an important role in promoting the Airbus Ethics & Compliance Programme and culture and serve as a point of contact for any employee who has questions about the Ethics & Compliance Programme or wishes to raise an E&C concern, including but not limited to bribery or corruption.

Policies and Procedures

Specific directives have been adopted to address key compliance risk areas at Airbus. These include among others:

- Requirements for Gifts & Hospitality;
- Requirements for Sponsorships, Donations and Corporate Memberships;
- Requirements for the Prevention of Corruption in the Engagement of Business Development Support initiative Third Parties (BDSI);
- Requirements for the Prevention of Corruption in the Engagement of Lobbyists & Special Advisors (L&SA);
- Requirements for Supplier Compliance Review;
- Requirements for Preventing and Declaring Conflicts of interest;
- Requirements for the Prevention of Corruption related to Mergers & Acquisitions, Joint Ventures and similar Transactions;
- Method for the Prevention of Corruption in the Context of International Cooperation & Offset Activities;
- Requirements for Anti-Money Laundering/Know your Customer.

Third Party due diligence processes

Consistent with the above directives, Airbus has implemented risk-based processes to run due diligence background checks on third parties before engaging with them. The depth of the checks varies based on factors such as: the type of services provided by the

third party; the type of relationship that Airbus will have with the third party (an agent; a supplier; a joint venture partner); the level of interaction that the third party would have with public officials; and the country or jurisdiction where the third party is based and/or will act.

Training & Awareness

All Airbus employees are required to undergo a minimum amount of compliance training via e-learning. Additionally, depending on the function, the country and the level of risk implied by their role, some employees may be selected to attend face-to-face training as well. Attendance in such cases is mandatory, and managers have a responsibility to ensure that their team members do so.

b. Detection

Speak up

Airbus promotes an open and trusting dialogue with employees. Employees can raise concerns to their line manager, their Human Resources Business Partner, a Legal & Compliance staff member, an Ethics & Compliance Representative (ECR) or through the Airbus “Open Line” (<https://www.airbusopenhine.com/>), a channel through which employees and other stakeholders may submit an alert securely and confidentially or anonymously.

Airbus protects those who Speak Up and raise concerns appropriately and in good faith. Airbus does not retaliate against anyone who raises a concern, or against those who assist in investigations of suspected violations.

Compliance allegations and investigations

Airbus takes seriously its responsibility to investigate allegations or evidence of wrongdoing promptly, thoroughly, and objectively. Airbus has developed a dedicated investigations procedure that we apply to all potential instances of misconduct, whether detected in the normal course of business, via the Airbus Open Line or from any other source. When misconduct is confirmed, Airbus considers not only appropriate disciplinary action for the employees involved, but also engages in a root cause analysis of the misconduct in order to propose timely and appropriate remediation action — including occasional updates to the Ethics & Compliance Programme itself — in order to address those root causes.

Monitoring, controls & audits

The Ethics & Compliance organisation is charged with oversight and monitoring of the Ethics & Compliance Programme to ensure that this Policy is being implemented effectively. Periodic controls on key processes are performed and reports provided to the Airbus Executive Committee and Ethics & Compliance Committee of the Board of Directors, including recommendations to strengthen the Ethics & Compliance programme where necessary. In addition, the Corporate Audit & Forensic Department conducts periodic, independent audits of Airbus compliance processes to assess the effectiveness of internal controls and procedures and allow Airbus to develop action plans for strengthening such controls.

c. Remediation

When misconduct reveals a gap in compliance policies, procedures or tools, Airbus undertakes revisions to its Ethics & Compliance Programme commensurate with the wrongdoing and in light of lessons learned.

