
Airbus Company Policy

Airbus Anti-Corruption Policy

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.

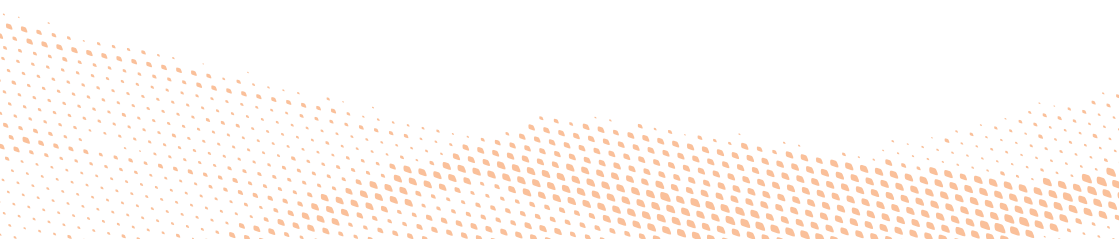


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1. Introduction

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 Standards of Business Conduct provide 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. Airbus employees 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. Any questions should be directed to your local Ethics & Compliance representative or to compliance@airbus.com.

2. Policy contents

a. Core Values

Our core values include Integrity, Compliance, Transparency, Non-Retaliation, Respect and Commitment.

In the words of Airbus CEO Tom Enders: “while we conduct our day-to-day business in different companies, we share one common roof – Airbus, and one common foundation – Integrity”.

b. Mission

Protect our People, our Company and its Reputation by maintaining a zero tolerance policy towards corruption of any kind, whether public or private, active or passive.

c. Vision

Continue to grow and pursue excellence, not just in terms of our products and services, but also in how we do business and achieve our results.

This is where this Policy fits in, by helping to summarise the prohibition against bribery and corruption for employees and other stakeholders, while providing an overview of the main elements of the Airbus anti-corruption compliance programme designed to mitigate this risk.



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

The anti-corruption laws that apply to Airbus and its employees 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”.

More importantly, they make it illegal for Airbus or its employees to remain wilfully ignorant of, or turn a blind eye towards, potential improper payments or bribes made by others, in particular third parties that act on our behalf – such as business partners, commercial consultants, agents, etc. Rather than insulating themselves, employees who adopt a “head in the sand” approach to potentially improper activity by others are likely to increase their risks of prosecution. Risks are decreased through the effective implementation of a robust compliance programme including risk-based due diligence designed to identify and appropriately mitigate risks, including with respect to third parties.

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 generally prohibit giving an individual “anything of value”, tangible or intangible, for the purpose of securing an improper advantage, and law enforcement has interpreted “anything of value” broadly to include:

- Extravagant or overly frequent Gifts or Hospitality, including meals, entertainment, event tickets, travel or accommodation without a clear business purpose;
- Medical, educational or living expenses;
- Sponsorships and donations (such as to the “pet charity” of a Public Official);
- Offers of employment or unpaid internships (such as to the son or daughter of a Public Official designed to curry favour);
- Contracts or business opportunities (such as an investment offered at below market value to a company controlled by a Public Official).

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

The term “improper advantage” typically refers to something to which an individual or company is not properly entitled, including preferential treatment in order to:

- Obtain, retain or renew a contract;
 - Obtain licences or regulatory approvals;
 - Prevent adverse government action;
 - Obtain a competitor’s bid information;
 - Influence a court or arbitration decision;
 - Avoid or reduce customs duties, taxes or fines.
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c. Facilitation Payments

Consistent with most anti-corruption laws, Airbus also prohibits “facilitation payments”, which are small, unofficial payments to low-level Public Officials to speed up or obtain routine administrative processes. Examples include visa applications, customs checks, administrative procedures, etc.

An exception to this Policy may be tolerated if a facilitation payment is made in the context of an imminent threat to the health, safety or welfare of an employee - in that case, he or she should immediately inform the local Ethics & Compliance representative.

4. Our anti-corruption compliance programme

Airbus has developed an anti-corruption compliance programme that is designed to mitigate the risk of bribery and corruption occurring. It includes the following elements among others:

a. Dedicated Organisation

The Airbus Ethics & Compliance Officer leads a dedicated team of professionals responsible for (i) drafting and implementing Directives and compliance programme processes, (ii) monitoring effectiveness, and (iii) providing support, advice and expertise across Airbus.

The Ethics & Compliance Organisation is part of the Legal & Compliance Department under the ultimate responsibility of the Airbus General Counsel. The Airbus General Counsel is an Executive Committee member who reports to the CEO and the Board of Directors. To maintain independence, the Airbus Ethics & Compliance Officer reports to both the Airbus General Counsel and to the Ethics & Compliance Committee of the Board.

b. Specific Directives

Specific Directives have been adopted to address key anti-corruption risk areas. These include among others:

- Requirements for the Prevention of Corruption in the Engagement of Business Development Support Initiative (BDSI) Third Parties;
- Requirements for Gifts & Hospitality;
- Requirements for Sponsorships, Donations & Memberships.

In addition, anti-corruption compliance safeguards are embedded in many other processes such as procurement and supplier management, Joint Venture formation and acquisitions, etc.

c. Monitoring and Audits

The Ethics & Compliance Organisation is charged with oversight and monitoring of the anti-corruption compliance programme to ensure that this Policy is being implemented effectively. Periodic reports are provided to the Airbus Executive Committee and Ethics & Compliance Committee of the Board, including recommendations to strengthen the compliance programme where necessary.

To complement this, the Corporate Audit & Forensic Department undertakes periodic, independent audits as well. Audits help to assess the effectiveness of internal controls and procedures and allow Airbus to develop action plans for strengthening such controls in the future.



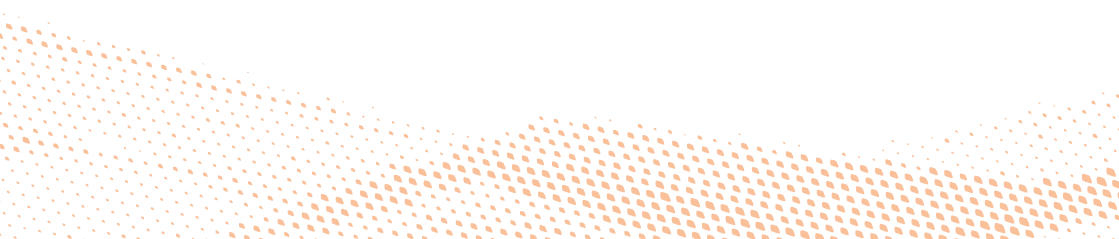
5. Role of each employee

Speak Up! Each employee is responsible for ensuring that this Policy and the related Directives are applied within his or her area of activity. Relevant employees must attend regular and appropriate training as requested by their managers.

If you need guidance or wish to report a concern, you should contact your line manager or an Ethics & Compliance or HR representative. In addition, the Airbus OpenLine (www.airbusgroupopenline.com) provides a confidential, secure and easy way to report concerns with regard to corruption and other areas such as financial and accounting fraud. Airbus will not tolerate retaliation against an employee who raises concerns in good faith, and is committed to protecting confidentiality and personal data.

6. Non-compliance

Subject to applicable laws and regulations, violations of this Policy may result in appropriate disciplinary measures in accordance with Airbus policies, and could additionally result in civil or criminal proceedings (or both) against individual employees and/or against relevant Airbus companies.



7. Record-keeping and document conservation

In compliance with applicable laws, it is Airbus' policy to maintain at all times accurate, reasonably detailed books and records that fairly reflect all transactions. Compliance with this Policy will be regularly audited and subject to internal control procedures.

There should not be any false or misleading entries in Airbus' books and records, including entries that are falsified to disguise improper transactions. Likewise, 'off-the-books', secret or unrecorded funds or assets are also prohibited.

8. Referenced documents

Airbus Standards of Business Conduct



AIRBUS

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