



# The Airbus Code

## Pocket Guide

March 2010 issue

New Standards. Together



**AIRBUS**



This document is a guide and does not constitute the full and complete contents of the Airbus Code. The official version of the Airbus Code is Airbus Top Document A00 (Issue D) that can be found on Airbus People. This Pocket Guide is modified from the original text to provide easy to use and understandable guidance for the Airbus employee in the conduct of the company's business. For further guidance or clarification on any topic covered in this Pocket Guide, the employee should contact his manager, reference the full and complete Airbus Code, contact HR, or contact the Compliance Program Officer. The Chief Compliance Officer of Airbus has an open door policy to hear and receive any comments or concerns any employee has with respect to the Airbus Code. The most current version of this document is available on Airbus|People (Airbus internal network).

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# Message from the Airbus CEO

Airbus draws on the strong traditions of each of its founding companies. It has built on its diversity to develop into a global leader in its markets.

Our commitment is to continue developing our business towards achieving even more ambitious targets. We want to ensure that Airbus' growth is sustainable, and therefore, to reaffirm our commitment to excellent ethical standards.

This is even more of a priority as Airbus' parent, EADS, is listed on international stock markets and has generated great expectations from its stakeholders.

Airbus has also adhered to the United Nations' Global Compact, an initiative of the United Nations, since 2003. These expectations and commitments motivate us to live up to the highest standards with regards to integrity, transparency and professionalism.

Our corporate reputation, based on a cohesive company culture, is one of the most valuable assets to Airbus. Consequently, each and every one of us must be committed to defending high ethical standards in our business relations inside, as well as outside, the company.

The values, policies and expectations formulated in this Code of Ethics are intended to provide the standard for the day-to-day conduct of our business, as well as for relationships with our business partners, fellow employees, shareholders and governmental authorities so that, all together, we drive Airbus at the very leading edge of integrity in our global business practices.

Employees are expected to embed these principles in their day-to-day activity inside this great company Airbus.

We are confident that this Code will support Airbus' reputation, enhance its strong values and provide you with an opportunity to demonstrate our shared culture.

Tom Enders  
Chief Executive Officer



# Airbus Code Scope and Implementation

## To Whom Does the Airbus Code Apply?

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Airbus Code is applicable throughout the company, and should be applied to all entities where Airbus has a joint control.

In adopting the present Code as their own, Airbus Group companies may include additional policy statements consistent with the Airbus Code, which remains the reference document.

These values must also be taken into account by suppliers, who are required by Airbus to implement and follow certain Key Business Practices.

## EADS Code of Ethics

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The EADS Code of Ethics is a primary corporate governance document of the EADS group. It is available on the EADS intranet. All employees should make themselves familiar with the EADS Code of Ethics.



## Non Retaliation Policy

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All employees are encouraged to seek advice and raise concerns if they have any question about whether their own conduct, or the conduct of others, is in accordance with the Airbus Code. Any direct or indirect retaliation, or attempted retaliation, against an employee who comes forth in good faith to seek advice or raise concerns, is strictly prohibited and will not be tolerated.

## Where Can Employees Get Help?

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If this Code does not answer your questions, you are encouraged to discuss your concerns with your manager or supervisor, or to contact the Airbus Chief Compliance Officer.

You may also contact a member of the Human Resources team or the Legal Department.

# Airbus Group Ethics Policies

## Doing Business Ethically

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### **Implementing Proper Business Practices**

Employees and business partners must not directly or indirectly offer, promise, give or ask for anything of value or any other improper advantage to obtain business.

### **Contracting with Governments**

All employees involved in government contracting must be aware of the guidelines governing the bid process in the relevant country and conduct themselves so as not to suggest or cause violation of these guidelines.

### **Avoiding Conflicts of Interest**

Airbus executives, managers and employees must avoid any situation that may create or appear to create a conflict between their personal interests and the interests of Airbus. A conflict of interest may arise when a director, executive, manager or employee takes actions or has interests that may make it difficult to perform his or her duties and responsibilities to Airbus objectively and effectively.





## **Complying with Export Control and Import Control Laws**

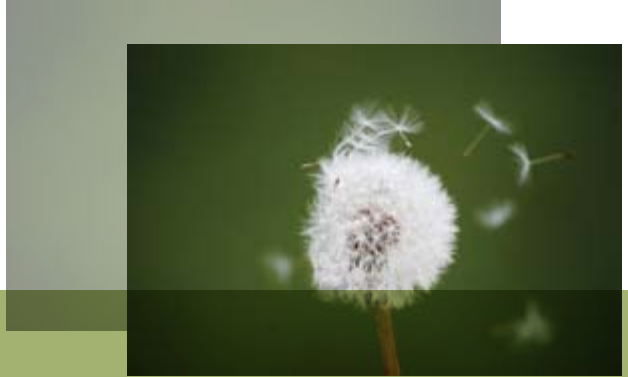
Employees involved in the import or export of goods, services or technology must be aware of and ensure compliance with applicable regulations. They must also ensure the accuracy of export/import documentation.

## **Complying with Competition Laws and Regulations**

Employees must comply with applicable competition laws.

## **Enforcing Insider Trading Rules**

Employees and others must avoid insider trading, i.e. they must not buy or sell stock or other securities of any company while in possession of inside or privileged information about the company. In addition employees and others must refrain from disclosing inside or privileged information to anybody to enable the person to buy or sell stock or other securities of the company on the basis of such information.



## Fostering Sustainable Growth & Respecting the Environment

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### **Fostering a Mutually Beneficial Relationship with Suppliers**

Airbus expects its supply base community to follow, cascade, and provide evidence of the application of its Key Business Practices.

### **Developing Environmentally Sound Processes**

Airbus entities and sites must ensure compliance with the environmental laws and regulations of the countries in which they operate.

### **Developing Environmentally Sound Products**

Airbus takes into account environmental criteria of its activities in all phases of products' life cycles, from conception and design, to manufacturing, operation, maintenance and end of life.

## Living in our Communities

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### **Contributing to Development**

Airbus seeks to make a contribution to the economic, social and educational well-being of the communities in which it operates through local and sustainable business development, and by providing opportunities for employment, improvement to infrastructure, technology acquisition and training.

### **Engaging in Donations and Sponsorship**

Employees should not engage in sponsorships or donations on behalf of Airbus without proper authorisation from management.

### **Promoting Civic Behaviour**

Airbus is sensitive to the community in which it conducts its business and decisions should take into account, on a voluntary basis, relevant social, environmental and political considerations.

## Airbus Compliance Council

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The Airbus Compliance Council is committed to implementing the principles described in the Airbus Code. The Airbus Executive Committee constitutes the Airbus Compliance Council which meets quarterly in conjunction with the Executive Committee meeting.

# Our Commitment to Product Safety

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## **Improving Our Product Safety**

Airbus is committed to contributing to the improvement of global air transportation safety by producing aircraft and providing support services at the highest possible standards in addition to participating fully in other safety-related activities.

## **Reporting Safety Issues**

Any Airbus employee who acquires knowledge of a potential or actual aircraft safety issue, incident or violation must report the information immediately to management, a member of the Product Safety Department or the Airbus Legal Department.

## **Dealing with Aviation Authorities**

As in all other areas, Airbus employees are required to act with professionalism, integrity and openness in all dealings with aviation authorities.



## Improving our Product

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### **Improving Quality**

Airbus employees should be committed to continuous improvement in the quality of products, processes and services.

### **Improving Aircraft Security**

Airbus, as a manufacturer, is committed to ensuring that its products are designed, manufactured, and delivered in accordance with the highest security standards while being compliant with all applicable security legislation and regulations.

### **Encouraging Innovation**

Employees are encouraged to develop innovative solutions for improving the safety, quality and efficiency of our products, while ensuring that solutions do not infringe the intellectual property rights of others.



# Promoting Good Corporate Governance

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## **Understanding the Airbus Governance Structure**

Executive Committee members have the shared responsibility of establishing and maintaining a clear strategic direction, sound financial management, effective employee leadership, and ensuring the effective governance of the Airbus business.

## **Delegating Authority**

No employee is authorised to enter into contracts or otherwise legally bind Airbus unless the proper authority to do so has been expressly delegated in accordance with established procedures.

## **Supporting Corporate Audit EADS**

Employees should cooperate with any internal audit by providing all requested documents and information in accordance with established procedures.

# Cooperating with Government Investigations

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## **Retaining Records**

Employees should never destroy documents or records in anticipation of a government request for those documents.

## **Cooperating with Public Officials**

Interference with a government investigation is a very serious offence that could result in significant monetary fines and even imprisonment.

## **Dealing with Visits from Public Officials**

Employees must coordinate with the Airbus Legal Department regarding any visit from a public official that relates to an investigation or inquiry.

## **Obtaining Legal Representation**

If any particular Airbus employee feels that they may be facing individual sanctions or penalties as a result of Airbus-related activities, they may ask for separate legal representation.

# Managing Information & Documentation

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## **Storing Records at Function-Level**

Employees should familiarise themselves with applicable document retention guidelines and adhere to them.

## **Ensuring the Accuracy of Records**

Airbus expects its employees to neither create nor participate in the creation of any records that are intended to mislead anyone or conceal any improper activity.

## **Respecting Document Retention Directives**

Notwithstanding any applicable document retention guidelines, if a manager or the Airbus Legal Department directs an employee to preserve certain documents, the employee must do so.





## Supporting the Internal Control Framework

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### **Supporting Internal Financial Control**

Employees must adhere to financial control standards and provide accurate and truthful financial information in their reports.

### **Supporting Risk Management**

Risk Management is about anticipation; each employee needs to know and manage potential risks in his area of activity.

## Improving Security & Avoiding Fraud

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### **Avoiding Fraud**

Airbus considers fraud to be an act of “Gross Misconduct” (as defined in Airbus employment contracts) and will rigorously investigate all incidents of suspected fraud.

### **Using Airbus Information Technology Tools**

Employees may not use information technology tools (e.g. telephone, e-mail, internet, fax) to pursue illegal or improper purposes.



## Protecting Airbus' Assets

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No company property (including documents, electronic data and information) can be accessed, used, disclosed or modified without proper authorisation, and shall in no case be stolen, damaged or destroyed (unless destruction is required for legitimate business purposes).

## Protecting Intellectual Property

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All employees having access to Airbus intellectual property must preserve the intellectual property rights of Airbus and respect those of third parties.

## Mastering Communication & Use of Information

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No employee may ever disclose confidential or proprietary information about Airbus or the Group companies, except when specifically authorised and then only on a “need to know” basis.

## Communication, Information & Protecting the Airbus Brand

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### **Dealing with Press and Media**

Employees must not provide information to the press or media without first informing the Press Department.

### **Protecting the Airbus Brand**

The Airbus brand is an asset of very high value. It therefore must be protected. Employees must respect the brand and image policies.

# Putting the Focus on our People & Create a Positive Working Climate

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## **Developing and Continuously Improving our Organisation**

Airbus sees its transnational organisation as an asset enabling us to profit from cultural diversity. All managers are requested to cascade authority and responsibility to the lowest level possible.

## **Making Employment at Airbus a Strategic Tool**

Airbus is a socially responsible employer; it strives to assure long-term employment for its workforce through the anticipation of cyclical industry changes. In return, Airbus employees are expected to set standards of excellence in their areas of expertise and to support the company's actions in managing the evolution of its core business.

## **Living the Dialogue with our Employees**

Airbus is committed to maintaining a constructive, open, objective, responsive and transparent social dialogue and partnership with our employees and their representatives at both the local and transnational level. We expect our employee representatives to help shape our future by having a shared understanding of our vision and goals while drawing on our national traits for the benefit of Airbus.

## **Developing our People and our Leaders**

Airbus sees the continual development and expansion of the skills and competences of our people as key to our sustainable success and central to the interests of all our stakeholders.

## **Providing a Safe and Healthy Working Environment**

An integral part of our role as a socially responsible business is our total commitment to providing all who work in or visit our locations with an environment that is always healthy and safe.



## **Building a Fair Rewarding System**

Airbus offers its employees a wide range of pay, benefits and other related programmes to reward and recognise both individuals and teams for their responsibilities, behaviours and contribution to the achievement of the company's goals.

## **Using Personal Data**

Employees should respect the confidentiality of all proprietary or staff-related information.

## **Promoting Open Dialogue**

Airbus supports open and honest dialogue with employees and their appointed representatives.

## **Providing Equal Opportunities and Non-Discrimination**

Airbus is committed to treating all employees and situations in a fair manner.

## **Managing Personnel Development**

Airbus acknowledges the talents of its employees and wishes to develop these for collective and individual benefit.

## **Providing a Safe Workplace**

Airbus is committed to maintaining and permanently improving safe and healthy working conditions for its employees and to fighting any type of physical, sexual, or psychological harassment, abuse or intimidation.



## Giving and Receiving Gifts & Hospitality

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Employees should refrain from soliciting or accepting money, high value gifts or any other gift or compensation which could be construed or misconstrued as having more than nominal value and which might influence or even give the appearance of influencing business decisions.

## Airbus Chief Compliance Officer Open Door Policy

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The Airbus Chief Compliance Officer is a resource to all employees. His door is always open to receive your issues, questions and concerns. To facilitate this process, he has two phone numbers where he can be contacted on a confidential basis:

+33 (0) 5.34.36.63.30 / +33 (0)6.03.17.25.45 (mobile)

# Ethics and Compliance Resources

Airbus Chief Compliance Officer: Patrick Donovan

Programme Compliance Officer: Hans H. Altfeld

Customer Affairs Compliance Officer: Thierry Schutte

Engineering Compliance Officer: Dominik Wacht

Finance Compliance Officer: Jeremy Tilney-Bassett

Human Resources Compliance Officer: Marie-Laure Lavigne

ICT Compliance Officer: Bruno Chenet

A350 Compliance Officer: Daniel Wenninger

Airbus Military Compliance Officer: Francisco Pavon-Fuentes

Procurement Compliance Officer: Ana Porto

Quality Compliance Officer: Julio Perez-Caballero

Customer Services Compliance Officer: Frederic Aubourg

Operations Compliance Officer: Nathalie Ducombeau

Strategy Compliance Officer: Francis Robillard

Legal Focal Points for Compliance Issues: Pierre Picq & Dirk Kroeger

Employees can find the name of their Human Resources Business

Partner on AirbusPeople: HR section / toolbox / HR contacts

General Counsel: Oliver Furtak

Company Secretary: Marc Fontaine



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