

## Surveillance technology companies in the MENA region

### Survey Questions

Name of company: **Airbus SE**

Headquarters address: **Mendelweg 30, 23333 CS Leiden, Netherlands**

Website: **www.airbus.com**

#### General Question

1. Are there any positive developments you would like to share regarding your company's human rights policies or practices, particularly with regard to your operations or projects in the Middle East and North Africa region?

**Airbus is firmly committed to conducting business ethically, based on its values and in compliance with all applicable laws and regulations. As part of this commitment, Airbus supports the principles of the UN Global Compact which includes respect for human rights. In addition, Airbus constantly monitor changes to international law to ensure that all sales are in compliance with any applicable legal requirements with regard to transactions with countries under the UN, EU, UK and US sanctions.**

**Furthermore, Airbus has been reviewing how to integrate human rights due diligence for defence sales through existing processes and tools with a view to mitigating the risk of misuse of its defence products. Please see below for additional details.**

#### Specific Questions

##### Client countries

2. Does your company provide surveillance solutions, products, services or equipment in any capacity in the following countries? Please choose all that apply.

**Airbus has provided surveillance solutions to customers including in the Middle East and North Africa, for the purpose of, for example, border control and the prevention of illegal activities such as smuggling and trafficking. Airbus does not produce surveillance equipment (cameras, radars etc). For further information, see:**

**<https://www.airbus.com/en/our-worldwide-presence/airbus-in-africa-and-the-middle-east>.**

|                  |  |                      |  |
|------------------|--|----------------------|--|
| Algeria          |  | Morocco              |  |
| Bahrain          |  | Oman                 |  |
| Egypt            |  | Qatar                |  |
| Iran             |  | Saudi Arabia         |  |
| Iraq             |  | Sudan                |  |
| Israel/Palestine |  | Syria                |  |
| Jordan           |  | Turkey               |  |
| Kuwait           |  | Tunisia              |  |
| Lebanon          |  | United Arab Emirates |  |

|       |  |       |  |
|-------|--|-------|--|
| Libya |  | Yemen |  |
|-------|--|-------|--|

3. If you chose one or more countries in Question 1, please provide a brief description of the scope of your company's operations or projects in such countries.

**Airbus does not provide details about its contracts with government customers. For information about the products we offer, see: <https://www.airbus.com/en/products-services/security>.**

4. Has your company conducted any assessments for identifying "high-risk/challenging context"<sup>1</sup> for the countries mentioned above? If so, does your company consider any of the following countries to be "high-risk/challenging context"?

**During 2023, Airbus continued to strengthen its risk-based human rights due diligence taking into account the OECD Due Diligence Guidance for Responsible Business Conduct. This due diligence is intended to support identification, mitigation and/or prevention and remediation of human rights risks across its supply chain and own operations as well as risks in relation to its products and services.**

|                  |  |                      |  |
|------------------|--|----------------------|--|
| Algeria          |  | Morocco              |  |
| Bahrain          |  | Oman                 |  |
| Egypt            |  | Qatar                |  |
| Iran             |  | Saudi Arabia         |  |
| Iraq             |  | Sudan                |  |
| Israel/Palestine |  | Syria                |  |
| Jordan           |  | Turkey               |  |
| Kuwait           |  | Tunisia              |  |
| Lebanon          |  | United Arab Emirates |  |
| Libya            |  | Yemen                |  |

### **Human rights due diligence**

5. Does your company have a publicly-available policy to respect human rights in its operations? Please provide links or attachments to the company's relevant policies.

**See "Airbus Human Rights Policy Statement" (January 2024): [https://www.airbus.com/sites/g/files/jlcpta136/files/2024-01/human\\_rights\\_policy\\_statement\\_january\\_2024\\_0.pdf](https://www.airbus.com/sites/g/files/jlcpta136/files/2024-01/human_rights_policy_statement_january_2024_0.pdf).**

6. Does your company conduct any human rights due diligence? Please choose all that apply.

<sup>1</sup> High-risk/challenging contexts include situations of armed conflict or fragile post-conflict as well as areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence, weak or non-existing governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses. See for example: [OECD Due Diligence Guidance](#); the [EC recommendations on the identification of conflict-affected and high-risk areas](#); and the [UNWG report on business in conflict](#).

Information on how Airbus conducts human rights due diligence can be found in the Airbus Human Rights Policy Statement, referenced in the previous question, as well as Airbus SE's "2023 Universal Registration Document" in chapter 1.2.10, Human Rights available here:

<https://www.airbus.com/sites/g/files/jlcbta136/files/2024-03/Airbus-Universal-Registration-Document-2023.pdf>.

|                                                                                                                                                                                                                                                                                                   |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| We conduct an assessment to identify potential human rights risks before taking on new clients and projects.                                                                                                                                                                                      |  |
| We conduct ongoing assessments to identify the human rights risks of all of our current clients and projects.                                                                                                                                                                                     |  |
| We carry out analysis of the political and human rights context in the countries in which we operate.                                                                                                                                                                                             |  |
| We assess whether there are links between our operation and the human rights situation in the country.                                                                                                                                                                                            |  |
| Based on our analysis of the context and our operation, we carry out a human right impact assessment to identify actual or potential negative impact.                                                                                                                                             |  |
| We identify appropriate mitigation measures, taking into account how they will be influencing existing power structures (e.g. empowerment/exclusion of a certain group) and how is it mitigating the related risks.                                                                               |  |
| There are precise criteria in place with business partners and others (in particular security forces) to address the negative impact or more broadly to decrease tensions? For example, contracts with business partners address the need for partners to mitigate negative human rights impacts. |  |
| We account for vulnerable groups by assessing the particular risks to them, rely on reports by advocates for vulnerable groups such as women's or indigenous' organizations and/or engaging with the affected stakeholders.                                                                       |  |
| We assess possible points of leverage where we can promote change.                                                                                                                                                                                                                                |  |
| We have a policy of heightened human rights due diligence that incorporates both international humanitarian law and human rights law.                                                                                                                                                             |  |

7. Is your company or subsidiary taking any other actions to ensure that the surveillance solutions, products, services or equipment that you supply or distribute are not causing or contributing to adverse human rights impacts? If yes, could you share these actions with BHRRC?

**As already outlined, Airbus is firmly committed to conducting business ethically, based on its values and in compliance with all applicable laws and regulations. This includes strict adherence to government licensing requirements including, for example, those related to surveillance items as described in Article 5 of Regulation (EU) 2021/821.**

**In addition, overseen by the company's Executive Committee, Airbus continued to review how to integrate human rights due diligence for defence sales through existing processes and tools with a view to mitigating the risk of misuse of its defence products. Actions include:**

- **Recognising that human rights considerations already exist in the stringent export compliance process, Airbus continued its assessment of the integration of human rights due diligence, upstream of the export control process, to assess the level of risk of potential misuse. This takes into account country**

risk (based on publicly available indices) and intended product use and will support a decision to progress to the export control stage.

- The completion of a pilot phase to test the practical application of the approach through a number of hypothetical sales campaigns.
- A revision to the standard conditions of sale for Airbus' Defence and Space and Helicopters divisions to act in accordance with national and international human rights regulations applicable in their respective countries including in this regard and in any case, the Arms Trade Treaty and the Geneva Convention.
- The development of a process to support integration once fully approved.

8. Does your company require subcontractors and other entities in your supply chain in the above-mentioned countries to comply with your human rights and other rights-related policies and procedures? If yes:

Airbus expects that all business shall be conducted by its suppliers in compliance with the principles of the Airbus Supplier Code of Conduct, which is the document of reference for its approach to responsible supplier management. The Airbus Supplier Code of Conduct, which is based on the International Forum on Business Ethical Conduct (IFBEC) model code of conduct, integrates the group-wide values and principles in line with internationally recognised standards and conventions (including the UNGPs, OECD and ILO).

In addition, all Airbus suppliers are required to confirm adherence to the principles of the Airbus Supplier Code of Conduct, including on human rights, and to cascade these principles throughout their own supply chain.

Airbus encourages suppliers to be transparent if they have any concerns complying with its supplier principles and expectations and is committed to supporting them, where necessary, to make improvements including to their own human rights or environmental due diligence.

The "Airbus Supplier Code of Conduct" can be found at:

<https://www.airbus.com/sites/g/files/jlcbta136/files/2021-07/Airbus-Supplier-Code-of-Conduct.pdf>.

- a) How do you hold them accountable to these requirements (e.g. through contract clauses) and ensure their compliance (e.g. through training, monitoring, penalties etc.)?

Airbus' standard procurement contract templates have evolved to reinforce clauses related to human rights. This includes requirements for Airbus suppliers to comply with applicable laws and regulations, including in connection with human rights, commit to apply (and cascade throughout their own supply chain) the principles of the Airbus Supplier Code of Conduct and to comply with other requirements such as to cooperate with a request for an evidence based sustainability maturity desktop assessment self-assessment questionnaire and/or on-site assessment conducted by a third party social assurance provider.

- b) Do you enforce compliance beyond the first-tier of your supply chain? What challenges does the company face in ensuring subcontractor compliance, both in the first and subsequent tiers?

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

9. Which stakeholders do you engage in your human rights due diligence process? Please choose all that apply.

|                                                                             |  |
|-----------------------------------------------------------------------------|--|
| Governments and executive bodies                                            |  |
| State regulatory bodies                                                     |  |
| Regional regulatory bodies                                                  |  |
| Specialised civil society, such as those in the MENA surveillance coalition |  |
| Concerned International organizations, such as:                             |  |
| Directly with vulnerable/at-risk communities, such as:                      |  |
| Other, please specify:                                                      |  |

Please share some of the good practices followed by your company on engaging with the above stakeholders.

10. In accordance with the UN Guiding Principle on Business and Human Rights, does your company have an operational level grievance mechanism in place for direct and subcontracted workers on your projects to raise concerns, in their own language, and in a way that ensures grievances can be reported safely, without intimidation or retaliation? Please provide a description of the company's grievance mechanism.

**Airbus is committed to promoting open and trusting dialogue within its own operations, supply chain and with other third parties including through the following mechanisms. Details are available on the Airbus intranet (accessible by Airbus employees), the 'contact us' section of the Airbus website or on a separate external website. Details are also communicated to suppliers through the Airbus Supplier Code of Conduct.**

- **SpeakUp provides a means for employees working on Airbus' own sites to speak up if they are concerned about any issue including relating to human rights or the environment. Employees are encouraged to raise concerns with their line manager, their human resources business partner or their legal, ethics or compliance representative. Concerns can also be raised through the Airbus OpenLine.**
- **The Airbus OpenLine is available both online and through a dedicated telephone number and provides a confidential way (where legally permissible) for people working on Airbus sites, in its supply chain or other third parties connected to its business activities to report a concern, including related to human rights. If an alert is received through OpenLine, Airbus commits to acknowledge receipt of the report as soon as possible.**

**All alerts of concern are handled by professional investigators with the assistance of subject matter experts where required.**

**Airbus 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. Airbus' non-retaliation principles are**

defined in a specific policy which provides a comprehensive guide on preventing, detecting and remedying retaliation

The “Airbus OpenLine Policy” can be found at: <https://www.airbusopenline.com>.

#### **Other information**

11. Is your company or subsidiary stopped or planning to stop engaging in the sale or provision of a range of surveillance solutions, products, services or equipment to Middle Eastern & North African countries on account of human rights violations?

**As already outlined, Airbus is firmly committed to conducting business ethically, based on its values and in compliance with all applicable laws and regulations. This includes strict adherence to government licensing requirements including, for example, those related to surveillance items as described in Article 5 of Regulation (EU) 2021/821.**

**See answer to Q7 for further information.**

12. Is there anything else that you would like to tell us about how your company takes a responsible approach to managing its operations in the above-mentioned countries, including any challenges it faces in doing so?

**See “Airbus Human Rights Policy Statement” (January 2024):**

**[https://www.airbus.com/sites/g/files/jlcbta136/files/2024-01/human\\_rights\\_policy\\_statement\\_january\\_2024\\_0.pdf](https://www.airbus.com/sites/g/files/jlcbta136/files/2024-01/human_rights_policy_statement_january_2024_0.pdf).**

**See Airbus SE's “2023 Universal Registration Document”, chapter 1.2.10, Human Rights available here:**

**<https://www.airbus.com/sites/g/files/jlcbta136/files/2024-03/Airbus-Universal-Registration-Document-2023.pdf>.**