

Airbus Group OpenLine POLICY

**Airbus Group Ethics and Compliance Office
Version 5 – 1 September 2014.**

1/ Introduction

Airbus Group is committed to high standards of ethical business conduct as reflected in the Group's Integrity Principles and related policies. Ethical business behaviour is the responsibility of every person in the company and is reflected not only in our relationships with each other but also with our customers, suppliers, shareholders, and other stakeholders.

All Airbus Group employees are strongly encouraged to report their concerns through the normal business channels such as, immediate supervisors, ethics and compliance personnel, human resources representatives, members of the legal department, or senior management representatives.

The OpenLine is a supplementary and exceptional process through which an employee may raise concerns if for any reason that employee is uncomfortable with using the normal business channels or with the answers that he has received from them. The system is available to all Airbus Group employees.

The use of the system is entirely optional and voluntary and there will be no consequences for employees who do not use the system.

The objective of this OpenLine policy is to explain how the Airbus Group OpenLine works, to define the scope of the system, and the safeguards that have been put in place to protect users and the personal data contained within.

2/ Key features of the Airbus Group OpenLine

To enhance the confidentiality of the system, and since the system is not anonymous, Airbus Group has decided to outsource the management of the telephone line and the website that will receive the alerts. Airbus has chosen a specialised external service provider, "Deloitte", located outside the European Union, in South Africa. Alerts will be handled in a secure environment by a restricted number of the external service provider's professionally trained personnel. The information given by Airbus Group employees through the OpenLine, including personal data, will be captured locally and stored in France only, on Deloitte France's IT servers.

Employees using the system contact the service provider directly, either by phone or via the website.

3/ Acting in Good Faith

Users of the OpenLine must act in good faith and must not make deliberately false accusations when creating an alert (the employee cannot make up a report or engage in falsification).

Good faith is when a submission is made without malice or consideration of personal benefit and the complainant has a reasonable basis to believe the allegation to be true.

Any employee who deliberately makes false or misleading statements or disclosures that are not in good faith may be subject to disciplinary action according to applicable national laws and regulations.

Any employee who makes statements or disclosures in good faith will not be subject to any disciplinary action even if the statements or disclosures are later shown to be inaccurate.

4/ Definition of an Alert

An alert is a reported concern that has been submitted by an identified employee acting in good faith using the OpenLine.

5/ Responsibility

The Group Ethics and Compliance Officer is responsible for updating this policy and for the oversight of the management of material alerts made pursuant to this policy.

The Group Ethics and Compliance Officer is also responsible for communicating to all parties involved in the treatment of all reported alerts and for providing feedback as soon as possible to the employee who made the alert.

6/ Confidentiality

Users of the alert system will be required to identify themselves to the service provider. The service provider will forward the alert without disclosing the identity of the person who raised it.

However, users may request that their identity be communicated to Airbus Group.

If that is the case, Airbus Group will make all possible efforts to protect the identity of the person creating the alert. All reports will be kept confidential, to the extent possible, consistent with the need to conduct a thorough and effective investigation, or as required by law or court proceedings.

7/ Scope of the Airbus Group OpenLine

At this stage, alerts posted on the Airbus Group OpenLine deal with accounting, financial, corruption and anti-competitive practices.

For Australia, Brazil, Canada, China, Mexico and Saudi Arabia the scope also includes disclosure of confidential information, conflict of interests, product safety for aeronautics, quality and harassment issues.

The use of the OpenLine is limited to employees of all companies controlled by the Airbus Group and located in France, Germany, Spain, UK, Australia, Brazil, Canada, China, Mexico and Saudi Arabia.

8/ Protection from Retaliation

Retaliation by any employee of the company, and/or by the company itself, directly or indirectly, against a person who, in good faith, submits an alert or provides assistance to those responsible for investigating the allegations, will not be tolerated. Harassment against an employee or adverse employment consequences as a result of the submission in good faith of an alert will not be tolerated either.

9/ Recording of Alerts and Reporting

Users of the system can create an alert in one of two ways:

1. They can call a dedicated phone number, or
2. They can go to the web-site.

Alerts will be received by the external service provider and reports will be communicated to the Group Ethics and Compliance Officer.

The reports will include only objectively presented information that is in direct relation to the permissible scope of the alert system and strictly necessary for the verification of the alleged facts.

All reports provided to the Group Ethics and Compliance Officer will not contain any element that can identify the employee.

However, the identity of an employee will be provided to the Group Ethics and Compliance Officer if one of the following conditions is met:

- (1) The employee has previously given his/her verbal or written consent to the external service provider to communicate his/her identity to Airbus Group.
- (2) Airbus Group provides written evidence to the external service provider of legal proceedings that require the communication of the identity of the employee.
- (3) Airbus Group substantiates to the external service provider that the allegations are malicious.

10/ Investigation Procedure

The report of an alert is sent to the Group Ethics and Compliance Officer by the external service provider (Deloitte). The Group Ethics and Compliance Officer and the Head of Compliance Allegations are the only points of contact with Deloitte.

If consistent, the report is given to the relevant Division and/or Functional Head of Ethics and Compliance.

They will conduct an initial review and assessment of the report, will decide who needs to be made aware of the report and will decide on the appropriate response in a timely manner.

After a review of the consistency/gravity of the concern, it will be decided to investigate or not the concern or not. The Divisions/Functional Heads of Ethics and Compliance will report back to the Group Ethics and Compliance Officer. The Head of Compliance Allegations will manage the reports that are not allocated to one division/function, or allocated to several, or upon request.

If an investigation is launched, a limited investigation team is set up with relevant Compliance Organisation members, experts¹ and management if relevant. In some cases, Corporate Audit and Forensic may be asked to conduct the investigations.

If recommendations or corrective actions are necessary, they will be decided by appropriate level of management. The Group Ethics and Compliance Officer and his compliance team are also responsible for oversight of any corrective actions, which may include disciplinary procedures according to national rules.

11/ Presumption of innocence

Any employee implicated in a reported alert shall be presumed innocent until allegations are proved.

12/ Communication and Feedback

The Group Ethics and Compliance Officer or the compliance team will notify any person implicated in a reported alert as soon as the decision to investigate the concern is taken, in order to allow the implicated person to exercise his/her rights, including defence rights.

However, the Group Ethics and Compliance Officer has the right to take protective measures, for example those measures necessary to prevent the destruction of evidence relevant to the alert, prior to notifying the implicated person.

The investigation team can respond to and communicate with the person who made the alert via the service provider.

¹ Such as members and experts from the Security, Legal, HR Departments...

The Group Ethics and Compliance Officer will provide feedback as soon as possible to the employee making the alert via the external service provider.

The external service provider will, in turn, ask the employee for his/her response on this feedback.

13/ Record Management and Rights of Access

Information provided in connection with a reported alert that is deemed to be unfounded or immaterial, will be destroyed or archived immediately.

Information provided in connection with a reported alert that has been deemed material and within the scope of the system will not be retained for a period exceeding two months from the date after the investigation procedures end, except in cases in which disciplinary and/or judicial proceedings have been brought against the implicated person or the person who submitted the alert or any third person. After this time period, the information will be archived.

In line with national laws, the implicated person has the right to access the data that concerns him or her and to request that such data be corrected or deleted, as applicable.

An implicated person may not obtain information regarding third parties, such as the identity of the person who made the alert, on the basis of such rights of access.

14/ Contact Details

An Airbus Group employee can get in contact with the OpenLine by:

- Connecting to the Airbus Group OpenLine website: www.airbusgroupopenline.com. This medium is available in English, German, French, Spanish, Mandarin and Arabic.
- Calling the following numbers

Country	Toll-free number	Non toll-free number
Worldwide		+27 (0)315715424 +33 (0)567804343
France, Germany, Spain, UK	00 800 27 00 00 07	
Australia:	18 00 24 91 39	
Brazil	080 08 91 87 15	
Canada	18 55 22 53 002	
China	4001200144	
Mexico	0018005140205	
Saudi Arabia		800-844-4045

The OpenLine is operated in English 24/7.

For French, German, Spanish and Portuguese an operator is available from 07:00 to 16:00 (CET), with an automatic voice messaging outside working hours.

Mandarin is available during Chinese office hours 08:00 to 17:00 MYT (UTC +8) with the option to speak English 24/7.

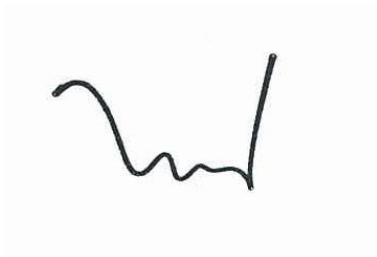
Employees from Saudi Arabia may leave a message on an Arabic voice mail box or use the English speaking phone line 24/7.

Requests for further information should be referred to the Group Ethics and Compliance Officer:

Mr. Pedro Montoya
Group Ethics and Compliance Officer
Airbus Group
4, rue du Groupe d'Or
31701 Blagnac Cedex
France

15/ Specific information per country

Before using the OpenLine, Airbus Group employees located in France or in Australia must also read the national Information Notice, in line with national regulations.

A handwritten signature in black ink, appearing to be 'Pedro Montoya', written on a light gray background.

PEDRO MONTOYA
Group Ethics & Compliance Officer