

INSIGHTS ON INDUSTRY DUE DILIGENCE FROM THE CORPORATE POLICIES OF TOP ARMS MANUFACTURERS

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Corporate policies of arms manufacturers

Manufacturer	State of Registration	Corporate Policies
Airbus	Netherlands (operating in France, Germany and Spain)	Code of Conduct; Human Rights policy
Almaz-Antey	Russia	-
AVIC	China	-
BAE Systems	United Kingdom	Human Rights Statement; Product Trading (summary); Export Control Policy (summary)
Boeing	United States	Code of Basic Working Conditions and Human Rights
Dassault	France	CSR Statement; Good Practices document
General Dynamics	United States	Policy Statement on Human Rights

Manufacturer	State of Registration	Corporate Policies
Heckler & Koch	Germany	Code of Ethics and Business Conduct; Trade Compliance statement
Kalashnikov Group	Russia	Anti-Corruption Policy
L3Harris Technologies	United States	Code of Conduct; Human Rights policy; Trade Compliance statement
Leonardo	Italy	Code of Ethics; Group Policy on Human Rights; Trade Compliance Program; Project Risk Management
Lockheed Martin	United States	Code of Ethics; Human Rights Policy
MBDA (merger of Airbus, BAE and Leonardo subsidiaries)	France, Italy + United Kingdom	Code of Ethics

Manufacturer	State of Registration	Corporate Policies
NORINCO	China	Corporate Statement on Non-Proliferation
Northrop Grumman	United States	Human Rights Policy; Standards of Business Conduct
RTX (formerly Raytheon)	United States	Code of Conduct; Human Rights Policy
Rheinmetall	Germany	Code of Conduct; Export Control policy; CSR policy
Rolls-Royce	United Kingdom	Export Control and Sanctions Policy; Human Rights Policy (summary)
Rostec (incl subsidiary High Precision Systems)	Russia	CSR policy
Thales	France	Code of Ethics; Compliance statement

Table 1 (modified): H. Alwishewa, 'Responsibilities to Prevent: Responsibilities of Supply-Side Actors to Prevent the Adverse Human Rights Impacts of Arms Exports to Conflict Zones', PhD thesis, Graduate Institute of International and Development Studies, Geneva, March 2024.

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Arms company	State of Registration	Ranking based on arms revenue	Total percentage of company revenue from arms revenue	Relevant corporate policies
Lockheed Martin	United States	1	90%	Human Rights Statement ²³
RTX (formerly Raytheon Technologies)	United States	2	59%	Human Rights Policy ²⁴
Northrup Grumman	United States	3	88%	Human Rights Policy; Standards of Business Conduct ²⁵
General Dynamics	United States	5	72%	Policy Statement on Human Rights ²⁶
BAE Systems	United Kingdom	6	97%	Human Rights Statement; Pursuit of Export Opportunities Policy (summary only); Export Control (summary only) ²⁷
L3Harris Technologies	United States	12	74%	Human Rights Policy; Code of Conduct ²⁸
Leonardo	Italy	13	83%	Group Policy on Human Rights; Trade Compliance Program; Project Risk Management ²⁹
Thales	France	17	51%	CSR statement; Compliance statement ³⁰
Dassault	France	23	70%	CSR statement; CSR Policy ³¹
Rheinmetall	Germany	28	67%	Export Control policy; Human Rights Policy Statement ³²

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Manufacturer	State of Registration	Corporate Policies
Lockheed Martin	United States	Code of Ethics; Human Rights Policy
Raytheon Technologies	United States	Code of Conduct; Human Rights Policy
Northrop Grumman	United States	Human Rights Policy; Standards of Business Conduct
General Dynamics	United States	Policy Statement on Human Rights
BAE	United Kingdom	Human Rights Statement; Product Trading Summary; Supplier Principles; Export Control Policy Summary
L3Harris Technologies	United States	Code of Conduct; Human Rights policy; Trade Compliance statement
Leonardo	Italy	Code of Ethics; Group Policy on Human Rights; Trade Compliance Program; Project Risk Management
Thales	France	Code of Ethics; Compliance statement
Dassault	France	CSR Statement; Good Practices document
Rheinmetall	Germany	Code of Conduct; Export Control policy; CSR policy

Table 2: H. Alwishewa, 'Human Rights Due Diligence for Arms Companies: Lessons from Supply Chain Regulations for Conflict Minerals', *European Journal of Risk Regulation*, 2024.

Referenced work

- Alwishewa, H. (2024). 'Human Rights Due Diligence for Arms Companies: Lessons from Supply Chain Regulations for Conflict Minerals'. *European Journal of Risk Regulation*. <https://doi.org/10.1017/err.2024.83>
- Alwishewa, H. (2024). 'Responsibilities to Prevent: Responsibilities of Supply-Side Actors to Prevent the Adverse Human Rights Impacts of Arms Exports to Conflict Zones'. PhD thesis, Graduate Institute of International and Development Studies, Geneva, March 2024. <https://repository.graduateinstitute.ch/record/302662>
- Alwishewa, H. (2024). 'The Move Towards Human Rights Due Diligence Policies by the Arms Industry'. *Forum on the Arms Trade: Looking Ahead 2024 Series*. 18 January 2024. <https://www.forumarmstrade.org/blog/the-move-towards-human-rights-due-diligence-policies-by-the-arms-industry>

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