

Moving forward responsibly

Questionnaire for the defence industry



January 2026

Before you get started

This questionnaire will help us to understand what you manufacture, where you sell it and how you manage risks in the defence industry. By providing clear answers, you'll help us to process your request faster and without additional questions.



What you need to fill in this form

- List of your products or services
- Countries where you buy or sell
- Your main suppliers and buyers
- Your company policy

Click the  icon for more information.

1

Understanding of defence-related risks

Please give a concise description of your defence-related products, where the relevant manufacturing and sales activities are carried out and who is involved in them.

Choose the category that is most applicable to the products your company offers in relation to the defence industry, and then describe the specific products:

1.1 Military-only items Dual-use items Non-military items

Please describe the specific products your company offers, and add the product code (such as the EU Dual Use code) if you have one.

1.2 _____

Please list the countries where your buyers or customers in the defence industry are located. Specify whether an export licence is needed, and if it isn't, please explain why not (for example, domestic sales only or an exemption applies).

1.3 _____

State the countries where your products are ultimately used or consumed. State whether an export licence is needed and if it isn't, please explain why not (for example, domestic sales only or an exemption applies).

1.4 _____

If your company does business with companies related to controversial weapons, please explain more about the products supplied to or bought from these companies.

1.5 _____

State below which suppliers you do business with and which countries they're based in.

1.6



If your company only manufactures or sells non-military goods or services, you can skip these questions.



Understanding of how these risks are managed

If your company manufactures or sells military-only or dual-use products, we would like to know more about how you identify and manage the associated risks. Please give a description below of your relevant policy rules, guidelines and measures. You can also add supporting documents. Click the *i* icon for more information.

Anti-corruption policy

Which anti-corruption policies, guidelines or measures has your company implemented?

2.1

Human rights obligations

To what extent has your company expressed its support for the UN Guiding Principles on Business and Human Rights (UNGP)?

2.2

How has your company expressed its support for the UNGP, for instance in statements or governance documents?

2.3

Due diligence process

How is your company's due diligence process relating to human rights aligned with the UNGP and the OECD Guidelines for Multinational Enterprises? Describe the main steps and any applicable related policies and procedures.

2.4

Who advises or decides on ethical issues within your organisation and how, particularly in relation to controversial transactions? For instance, do you have an internal ethical committee or similar structure, with related policies, guidelines or procedures?

2.5

How does your company assess the governance, transparency and ethical standards of your customers and how are these results considered in your processes?

2.6

How are internal decisions about defence activities, in relation to governance, transparency and ethical standards, made and assessed?

2.7

Companies in the defence industry have to follow international sanctions rules. How does your company comply with this requirement, in assessing defence-related activities? And how are these checks included in your process?

2.8



Statement and signature

In signing below, I confirm that the information provided is complete and accurate to the best of my knowledge. I also confirm that I am authorised to sign this statement on behalf of your company. Read our [privacy statement](#) to find out more about how we process personal data.

Name _____

Location _____

Date _____

Signature _____



The statement below is only needed if you operate in drone-related trade or fully autonomous weapons.

To support a responsible and transparent partnership, please read and confirm the following statements. I declare that my company...

recognises potential human rights violations, including possible violations of international humanitarian law, associated with fully autonomous weapons, and confirm that such risks may be associated with my company's products or technologies.

3.1

is committed to maintaining a transparent, continuous dialogue with ABN AMRO about these risks and to taking appropriate measures to mitigate these risks where necessary.

Name _____

Date _____

Signature _____

Appendix

Explanation of the information icons

Before you get started

Why we're asking this

We work together with many companies in the defence industry. To do this responsibly, we need to know that the products and services we support are used safely and in accordance with the law, based on the UN Guiding Principles on Business and Human Rights. This is why we ask all clients in this sector to share information about what you manufacture, where your products end up and how your company manages important risks. Your answers will help us make our partnership transparent and compliant.

Chapter 1

These definitions will help you understand which activities are in scope for this questionnaire

Defence-related activities: work related to the development, manufacturing, trade in or supply of goods or services that are used for military or defence purposes.

Defence-related organisations: any organisation that makes, develops or trades in defence-related products or uses such products or services.

Defence-related purposes: any activity that is linked to military usage, whether defensive (protection, security) or offensive (combat or attack).

Customers: the direct or indirect clients who receive, use or buy your products or services.

1.1 What these categories mean

Military-only items: products designed or adapted for military use.

Dual-use items: products that are mostly used for civilian purposes, but that can also have military applications.

Non-military items: products not on the military or dual-use lists. These items are used for general civilian purposes and have no military advantages. They include food, office supplies, fuel, electricity and general repair or facility services.

If your products relate to the drone industry, please see the statement at the end of the questionnaire.

1.3 Why are we asking this?

We ask where your buyers or customers are located so we know how your products are distributed internationally. This information lets us quickly check compliance with export rules.

What we mean by customers

Customers are companies or organisations that buy your products directly, such as distributors, integrators, government bodies and end users. State their names and - where relevant - the countries they operate in.

1.4 Why are we asking this?

We want to understand where your products are ultimately used. This helps us to keep banking responsible and assess security, legal requirements and international standards.

End user unknown

If you don't know who exactly is the end user, please write the most likely country of use or the country to which your direct client sends or supplies the products.

1.5 Why is this important?

International agreements deem certain weapons to be controversial. Banks have to perform extra checks when companies are involved in these types of activities.

Controversial weapons:

- A. Cluster munitions
- B. Nuclear or radiological weapons
- C. Anti-personnel landmines
- D. Biological weapons
- E. Chemical weapons
- F. White phosphorous munitions
- G. Depleted uranium weapons
- H. Fully autonomous weapons

1.6 What do we mean by suppliers?

Suppliers are companies that provide the parts, components or materials that you use in your military-only or dual-use products. Knowing who your suppliers are, will give us a better understanding of your supply chain and the associated risks.

Chapter 2

Why are we asking this?

Companies in the defence industry can be linked to serious risks, such as human rights violations, corruption, terrorism, sanctions violations or misuse of new technologies. These risks can occur in your supply chain, the countries in which you operate or the way in which your products are used.

We ask about your policies and processes so we can understand how you identify and manage these risks. For instance, which measures you've taken and how you ensure safe, legal and responsible operations. If there is no specific policy, please explain why not and describe the alternative steps your company takes to manage the risk.

2.1 What you can include in your answer

Describe how your company prevents bribery and corruption, for instance with anti-bribery rules, rules on conflicts of interests, guidelines for gifts and hospitality, training, monitoring or escalation procedures. You can add links or attachments if necessary.

2.2 What you can include in your answer

Please describe your company's main human rights obligations. These can include obligations under a Human Rights Declaration, a Code of Conduct, a Suppliers' Code, sector norms or industry standards.

Give a brief explanation of how these apply to your company and supply chain.

2.3 What you can include in your answer

Describe whether and how your company supports or refers to the UNGP, for instance in policy documents, public statements or governance documents. You can add links or attachments.

2.4 What this question is about

We are asking this to understand how your company identifies, assesses and manages human rights-related risks.

What you can include in your answer

Describe the steps you take, such as identifying risks, assessing the seriousness, taking action to prevent or mitigate risks, monitoring or evaluating actions and communicating results.

If relevant, explain how your process is aligned with the UNGP or OECD guidelines.

2.5 Why are we asking this?

Some companies have internal committees or expert groups that assess ethical or sensitive issues. Knowing how these groups work helps us understand your governance better.

What you can include in your answer

Describe the name of the committee, the roles and responsibilities, who is on the committee and when and how ethical or controversial issues are assessed.

2.6 What this question is about

We're asking how you assess the integrity and ethical standards of companies and organisations that buy your products. This helps us understand how you manage risks in your value chain.

What you can include in your answer

KYC/EDD processes, sanctions screening, ownership checks, integrity checks, ESG screening, site visits (if applicable) and how the findings affect your decisions.

2.7 Why are we asking this?

Decisions about defence activities can involve security, legal and ethical risks, so we want to understand how your company assesses and approves these decisions internally.

What you can include in your answer

Describe how your internal process works. Include such things as threshold values (when additional approval is needed), approval levels (who has to approve

what), involvement of second and third-line functions (compliance, risk, legal) and how you involve policy, risks or ethical considerations when making decisions.

Why this helps

This information shows how your company ensures that decisions are made responsibly and in line with your own standards.

2.8 Why are we asking this?

To understand how your company checks sanctions risks and how these checks affect your decisions.

What you can include in your answer

How you screen clients, suppliers and buyers against sanctions lists, which tools you use, who performs the sanctions checks, what you do with positive or ambiguous hits, or how sanctions results affect your decisions.

3.1 Why do you need to make this statement?

Companies that design, manufacture or trade in drones, drone components or technologies that may contribute to fully autonomous weapons are subject to strict international rules. These rules are in place because these technologies can be used to select and attack targets without any meaningful human control.

Why are we asking this?

In light of these risks, ABN AMRO is required to perform additional due diligence checks on clients operating in these areas. Your statement helps us understand your company's role and how you manage the related ethical, legal and human rights risks. We can then process your case conscientiously and transparently.