Modern Slavery Statement 2022

This statement is made on behalf of Boeing UK[1] pursuant to section 54(1) of the Modern Slavery Act 2015 (the "Act"). It sets out the activities taken by Boeing UK during the financial year ending 31 December 2022 to identify, prevent and mitigate modern slavery and human trafficking in its own operations, and supporting supply chains, as well as its continuing commitments. Boeing UK views liberty, human dignity and freedom from oppression as fundamental rights. Boeing UK categorically opposes all forms of modern slavery (including forced labour, debt bondage, domestic slavery, deceptive recruitment practices, and use of threats or coercion), human trafficking, forced labour and child labour, and wholly supports the objectives of legislation designed to eradicate these crimes, including the Act.

Boeing UK's Business and Supply Chain

Boeing has partnered with the UK since before the Second World War. Over the course of a relationship that spans more than 80 years, Boeing UK has grown to a highly-skilled workforce of over 3,500 people across 30 key locations.

Boeing UK has entered into the Prosperity Agreement, a long-term initiative with the UK Government founded in 2016, which delivers significant economic benefit to the UK, and is focused on supply chain, exports, skills, sustainability, capability and innovation.

Boeing is woven into the fabric of the UK's aerospace and wider industrial ecosystem, including deep collaboration with the UK Government, long-term research partnerships with six universities and a diverse network of over 500 domestic suppliers.

The UK is the second largest international market for Boeing for supply chain spend, where over £2bn has been spent since 2015 - most of which is on the export of high-value aerospace parts.

300 Boeing aeroplanes are operated in the UK, and more than 120 Boeing Chinook, Apache, Poseidon and C-17 aircraft provide battle-winning, life-saving capability to the UK armed forces. We have also established a conversion facility with supplier STS Aviation to conduct heavy modification work in Birmingham to covert 737s into the RAF's future Airborne Early Warning and Control fleet.

Over £300 million direct investment has been made in the UK by Boeing since 2015, including three major infrastructure projects, helping to grow the local aerospace sector, create jobs and drive innovation for mutual benefit. This includes £50M at RAF Lossiemouth, £40M on the company's first European factory in Sheffield and £88M for a new hangar and freighter conversion facility at London Gatwick.

[1] Boeing UK includes Boeing United Kingdom Limited, Boeing Defence UK Limited and Boeing Commercial Aviation Services Europe Limited

Boeing's commitment in the UK

- 300 commercial and 120 defence aircraft operate in the UK;
- £12.3B+ spent with our UK supply chain since 2015;
- £12M spend focused on community, higher education, STEM and veteran support projects since 2015;
- £300M direct investments into the UK since 2015;
- £100M+ invested in UK innovation since 2015;
- 850+ UK companies attended Boeing supply chain events since 2016;
- 400+ Early Careers participants since 2016; and
- Six strategic long-term partnerships with universities across England and Scotland.

Principles and Ethics

Boeing is committed to taking steps to identify and eradicate modern slavery risks within its business operations and supply chains. Boeing will act with speed should any audit or accusation uncover a violation of these principles.

Boeing's commitment is embodied in its policies and procedures, including the Boeing Code of Conduct, which charts its zero tolerance approach to modern slavery and human rights infringements.

The UK Government's Supplier Code of Conduct requires suppliers to comply with all applicable human rights and employment laws in the jurisdictions in which they work. This includes complying with the provisions of the Act. In addition, UK government suppliers must have robust means of ensuring that subcontractors in their supply chain also comply. Boeing expects this same level of commitment from its worldwide supply chain partners and suppliers.

Boeing has established an enterprise level procedure to govern its compliance with the U.S. Federal Acquisitions Regulation ("FAR") on Combatting Trafficking in Persons. To support its obligations under the FAR, Boeing uses a robust third party tool created by a supply chain risk management software provider (FRDM). This tool assists Boeing with identifying risks in its supply chain, enabling Boeing to engage with suppliers to promote awareness and challenge potential or actual infringements.

Further, Boeing is continuously evolving its enterprise approach to addressing human rights throughout its global operations and supply chain. Recent efforts include assessing global modern slavery compliance obligations to ensure Boeing's practices are keeping pace with this dynamic regulatory topic in the UK and globally.

Effective Measures and Controls

Boeing UK has adopted well-established control systems relating to modern slavery and human trafficking to ensure compliance with internal policies, procedures and applicable laws.

Boeing's Compliance with Anti-Human Trafficking and Modern Slavery Regulations procedure identifies risk area owners in functions, including its supplier management organisation, who have an ongoing obligation to develop controls for human trafficking risk areas. Boeing UK appoints local risk area owners who prepare documented self-

assessments, together with a signed certification, on an annual basis.

Boeing UK vets its suppliers as part of its onboarding process to establish actions and attitudes towards modern slavery and human trafficking, which are subsequently monitored as part of Boeing UK's ongoing supplier relationship management.

Boeing UK includes a contractual clause in its general provisions which prohibits suppliers from engaging in any practice that amounts to modern slavery as defined under the Act, and requires suppliers to adopt and enforce similar obligations to those embodied in Boeing's Code of Basic Working Conditions and Human Rights. This contractual provision also requires suppliers to conduct proper checks on their own suppliers for compliance with the Act and immediately notify Boeing of actual or suspected breaches of the sub- supplier's obligations. Boeing UK has the right to treat any contraventions of law relating to basic working conditions and human rights as a fundamental breach of contract and accordingly it may elect to cancel any open orders with such a supplier.

Training and Awareness

Boeing provides modern slavery and human trafficking training to employees and managers across the enterprise who have direct responsibility for supply chain management, particularly with respect to mitigating risks within its product supply chains. The training provides an overview of human trafficking activities and identifies suspect behaviours Boeing employees should be mindful of when visiting suppliers.

Being able to identify people who have been subjected to modern slavery is an important step in Boeing achieving its goal to de-risk its supply chain. Staff are encouraged to be vigilant when engaging with suppliers for red flag indicators. Such indicators include employees or personnel who appear to be under excessive control by another, are unable to move or interact freely, appear frightened or withdrawn, or do not appear to have the appropriate equipment or training for the job in hand. Further, Boeing UK employs special monitoring measures for suppliers suspected or implicated in other areas of bad business practice such as counterfeit goods and trading in conflict minerals.

When assessing supplier proposals, Boeing's supply chain personnel are encouraged to flag suspiciously low pricing, or unrealistically fast response times and suggested contract completion dates. Within the well established markets and heavily regulated industries that Boeing operates, such activity from potential suppliers (especially those new to the market) would be challenged.

Boeing UK promotes external advocacy and awareness by communicating its supply chain human trafficking guidance through the Boeing Code of Basic Working Conditions and Human Rights, which is referenced in Boeing UK's general provisions, and the Doing Business with Boeing website.

Accomplishments

Since first publishing its statement, Boeing UK has:

- Updated its standard general provisions to include specific obligations imposed by the Act, mechanisms to verify compliance, and the right to treat any contraventions of law relating to basic working conditions and human rights as a fundamental breach of contract;

- Revised its supplier onboarding procedure to require the provision of information relating to adherence with the Act within the supplier's own supply chain;
- Expanded its standard internal training on modern slavery to all functions and business units, outside of those directly responsible for supplier management and procurement;
- Completed annual self-assessments to ensure its obligations relating to modern slavery and human trafficking have been met;
- Explored the adoption of external tools to audit the Supply Chain and identify geographic areas which heighten modern slavery risks;
- Monitor proposed amendments to its obligations under the Act;
- Included a 'Modern Slavery and Human Trafficking Training and Awareness' module in its twice-yearly mandatory procurement training event for new-hires; and
- Established a UK Compliance and Risk Management Council, with oversight and responsibility for matters including the identification and elimination of modern slavery and human trafficking.

Continuing and Future Commitments

Boeing UK is committed to ensuring high standards of human rights within its supply chain. To achieve this, Boeing UK commits to carrying out the following activities:

- Develop and further enhance its programme of training for the local workforce to assist in highlighting modern slavery risks and issues in the supply chain;
- Support and complete the UK Government's Modern Slavery Assessment Tool, and review the recommendations produced;
- Boeing Defence UK Limited will continue to be a signatory to the UK Prompt Payment Code, and remains committed to ensuring that suppliers are paid in accordance its requirements;
- Monitor its supply chain for human trafficking in line with the Boeing enterprise approach;
- In support of the Public Services (Social Value) Act 2012, flow the social value themes to its supply chain, which include measures to reduce modern slavery; and
- Integrate and utilise the JOSCAR tool to identify broader risk areas within its supply chain, including through periodic assessment and reporting.

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