

## Introduction

This statement is published in accordance with the UK *Modern Slavery Act 2015*, the Australian *Modern Slavery Act 2018 (Cth)*, Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023)*, and California *Transparency in Supply Chains Act 2015* (together ‘the Acts’) for the 12 months ending December 31, 2024. The statement is made on behalf of The Boeing Company and wholly owned subsidiaries Boeing Australia Holdings Pty Ltd (‘BAH’), Boeing Canada Operations, Ltd (‘BCOL’), Boeing United Kingdom Limited (‘BUKL’) and Boeing Defence UK Limited (‘BDUK’) to disclose modern slavery controls in our operations and supply chains, and potential actions going forward.

The Boeing Company (NYSE: BA), is a global aerospace company headquartered in the United States that develops, manufactures and services commercial airplanes, defence products and space systems for customers in more than 150 countries. The Boeing Company and its wholly owned subsidiaries (‘Boeing’) are committed to a set of [core values](#) that are people-focused and include safety, trust and ownership. These values serve as guiding principles for empowering a corporate culture of professional accountability and open communication with stakeholders. Boeing respects and values human life and human rights and does not tolerate any form of modern slavery<sup>1</sup>. Boeing is committed to complying with global laws and regulations aimed at combatting modern slavery and expects its business partners and suppliers to do the same.

## Business Structure, Operations, and Supply Chain

The following Boeing entities are in-scope for the Acts, their respective structure, operations and supply chains are addressed below.

### Boeing Australia Holdings Pty Ltd (‘BAH’)

BAH (ACN 101 168 932) is the holding company for Boeing in Australia comprised of multiple subsidiaries<sup>2</sup>, however, only BAH, Boeing Aerostructures Australia Pty Ltd (ACN 103 165 466) (‘BAA’), Boeing Defence Australia Ltd (ACN 006 678 119) (‘BDA’), and Insitu Pacific Pty Ltd (ACN 122 991 333) (‘Insitu Pacific’) qualify as reporting entities for the purposes of the Australian *Modern Slavery Act 2018 (Cth)* for 2024.

Entity	Operations	Supply Chain
BAH	Location: Sydney Employees: 20 (0% union employees) A corporate services entity for communications, legal, tax, information technology, global trade controls and human resources functions	85 suppliers  Location by spend: Australia 81%, USA/Canada 15%, Europe 1%, Other 2%  Spend categories: IT hardware and maintenance 41%, Software 20%, External IT labour 14%, Telecommunications 13%, Other 12%

<sup>1</sup> Including servitude, forced labor, child labor, exploitation, human trafficking, debt bondage, and deceptive recruiting

<sup>2</sup> Additional BAH subsidiaries include Boeing Distribution Australia Pty Ltd (ACN 006 224 764), Jeppesen Australia Pty Ltd (ACN 010 573 814), Ozrunways Pty Ltd (ACN 145 926 941) and Wisk Australia Pty Ltd (ACN 674 613 346)

Entity	Operations	Supply Chain
BAA	Location: Port Melbourne; Fishermans Bend Employees: 1,024 (~85% union employees) Produces composite commercial aircraft flight control surfaces, develops materials and process technology, performs automated assembly and paint	465 suppliers Location by spend: Australia 76%, USA/Canada 18%, Europe 3%, Asia 2%, India 1% Spend categories: Metallic parts 21%, Facilities services 10%, Composite materials & parts 16%, Professional services 4%, Capital equipment 3%, Freight/Logistics 3%
BDA	Location: Brisbane; Various Australia locations Employees: 3,045 (10% union employees) Provides engineering, product support, training, and maintenance services	701 suppliers Location by spend: Australia 83%, USA/Canada 11%, Europe 5%, Other 1% Spend categories: Aviation maintenance, repair and overhaul 28%, Avionics components 11%, Construction and fit-out 7%, IT hardware and maintenance 7%, General electrical components 6%, Component manufacturing 5%, Software 4%, R&D 4%, General hardware and tools 3%, Aviation electrical, mechanical and hydraulic components 3%, Communication devices 2%, Other 20%
Insitu Pacific	Location: Brisbane Employees: 127 (0% union employees) Produces uncrewed aerial systems, provides related maintenance and training services	5 suppliers Location by spend: Australia 55%; USA/Canada 42%; Asia 3%

## Boeing Canada Operations, Ltd ('BCOL')

BCOL (2024811602) is the holding company for Boeing in Canada. It is largely a corporate services entity and operates the corporate head office in Ottawa ('Boeing Ottawa' or 'BCO'), with sites in Winnipeg ('Boeing Winnipeg' or 'BCW') and Vancouver ('Boeing Vancouver' or 'BCV'). Other Boeing subsidiaries operate in Canada<sup>3</sup>, however, only BCOL qualifies as a reporting entity for the purposes of the Canadian *Fighting Against Forced Labour and Child Labour in Supply Chains Act* for 2024.

Entity	Operations	Supply Chain
BCOL	Location: Ottawa Employees: 29 (0% union employees) Performs strategic planning and business development activities	Professional services, Office supplies, Computers

<sup>3</sup> Additional Boeing wholly owned subsidiaries in Canada include Boeing Distribution Canada, Ltd; Boeing Distribution Services Canada, Inc.; Jeppesen (Canada) Ltd.; and Wisk Canada Inc.

Entity	Operations	Supply Chain
BCW	Location: Winnipeg Employees: 1363 (73% union employees) Produces composite commercial aircraft parts and assemblies	514 suppliers (vast majority of BCOL suppliers) Location by spend: USA 51%, Canada 48%, Other 1% Spend categories: Professional services & site maintenance 46%, Metallic machined parts 16%, Heat shields & insulation blankets 12%, Non-metallic raw materials 13%, Aircraft structural assemblies 7%, Fasteners 3%, Paints & adhesives 1%, Standards 1%, Composites 1%
BCV	Location: Vancouver Employees: 220 (0% union employees) Produces commercial aviation operations software	28 suppliers Location by spend: USA 88%, Canada 11%, Other 1% Spend categories: IT hardware, software and services

## Boeing UK

Boeing's business in the UK is principally carried out through Boeing Defence UK Limited (01290439) ('BDUK') and Boeing United Kingdom Limited (04355070) ('BUKL') and Boeing Commercial Aviation Services Europe Limited (8186759) ('BCASEL') subsidiary. Other Boeing subsidiaries operate in the UK<sup>4</sup>, however, only BDUK, BUKL and BCASEL qualify as a reporting entity for the purposes of the UK *Modern Slavery Act 2015* for 2024.

Entity	Operations	Supply Chain
BDUK	Location: Bristol; Various UK locations Employees: 2,021 Performs modifications and sustainment of rotorcraft and fixed wing defense platforms. Provides defense logistics, engineering and training services	512 suppliers Location by spend: UK 68%, US 32% Spend categories: Software & support 27%, Construction 20%, MRO 15%, Aircraft parts 15%, Contract labour 5%, Other 18%
BUKL	Location: Various UK locations Employees: 496 (0% union employees) Customer support and internal business support service activities	210 suppliers Location by spend: UK 99%, Other 1%, Spend categories: Office supplies & consumables 68%, Facilities 11%, Freight 5%, Materials & spares 6%, Services 3%, IT 3%, Contract labour 2%, Other 2%
BCASEL	Location: Various UK locations Employees: 437 (0% union employees) Commercial aircraft maintenance engineering, modifications and technical publications.	205 suppliers Location by spend: UK 98%, Other 2%, Spend categories: Contract labour 69%, Professional services 15%, Office equipment & supplies 6%, Facilities 6%, Other 4%

<sup>4</sup> Additional Boeing wholly owned subsidiaries in the UK include Jeppesen UK Limited (1321734)

## Risk Assessment

Boeing operates in sophisticated and advanced technology industries with highly skilled workforces. While no business can definitively certify that it is free of modern slavery, Boeing considers the risk that it causes, contributes to, or is directly linked to modern slavery through its operations and supply chains to be 'low'. In addition, Boeing did not have a substantiated modern slavery concern requiring activation of our remediation plan in 2024.

Our risk analysis method integrates external<sup>5</sup> and internal<sup>6</sup> sources of information to address our operations and supply chains, results are set out below.

Risk Category	Risk Type
Purchased Services	Risk of being directly linked to modern slavery practices through sub-tier suppliers of construction, catering, cleaning, and security services
Purchased Goods	Risk of being directly linked to modern slavery practices through sub-tier suppliers of raw materials, electronics, solar modules, personal protective equipment, and corporate logo clothing and merchandise
Geographic risks	Risk of being directly linked to modern slavery practices in sub-tier suppliers is elevated in locations with a higher prevalence of modern slavery such as China, India, Southeast Asia, and Democratic Republic of Congo

## Policies and Due Diligence Processes

Boeing deploys enterprise standard compliance controls to manage modern slavery risk throughout its operations and supply chains based on the *OECD Due Diligence Guidance for Responsible Business Conduct* (OECD, 2018) framework as shown in Figure 1 below. Boeing entities covered by this statement implement the enterprise standard compliance controls and have the option to implement additional controls.

<sup>5</sup> External data sources include [Walk Free's 2023 Global Slavery Index](#), [U.S. Department of Labor's forced and child labor analysis](#), peer company modern slavery statements, and aggregated data from the International Aerospace Environmental Group's pool of 5,000 sustainability assessments

<sup>6</sup> Internal data sources include allegations submitted to Boeing's ethics line, oversight reviews of Boeing's hiring practices and supplier due diligence

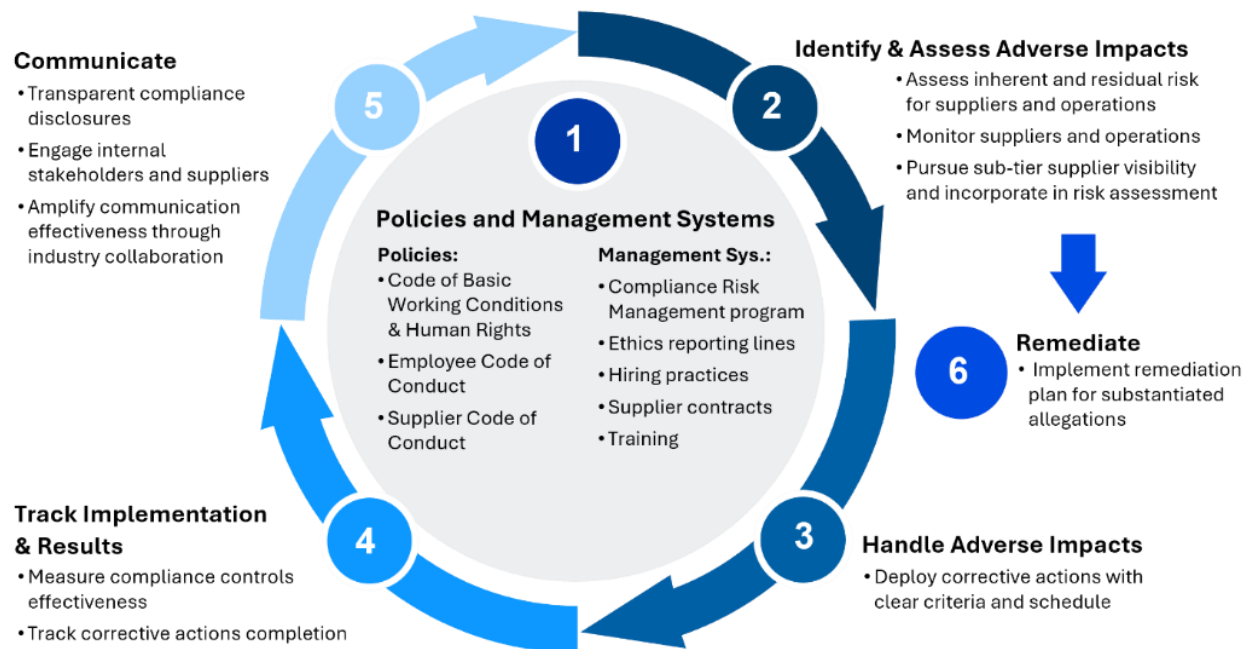


Figure 1 Boeing enterprise modern slavery compliance controls aligned to OECD Due Diligence Guidance for Responsible Business Conduct (OECD, 2018) framework.

## 1. Policies and Management Systems

Boeing's policies include the [Code of Basic Working Conditions and Human Rights](#), [Boeing Employee Code of Conduct](#), and [Boeing Supplier Code of Conduct](#)<sup>7</sup>. These codes include Boeing's firm commitment to the protection and advancement of human rights in our worldwide operations, supplier relationships and the expectation that all Boeing employees and suppliers support this commitment. Compliance and ethical behavior are everyone's responsibility, it's not only the right thing to do but is critical to long-term success.

Boeing deploys multiple management systems that are central to our compliance controls.

- Boeing's compliance governance process provides oversight and guidance for employees and contractors to meet Boeing standards regarding modern slavery (see Controls Effectiveness section for details).
- Boeing has an Ethics [web](#) portal which allows any Boeing employee or external party (including suppliers) to raise an ethical concern or question either by phone, or online (and anonymously if preferred).
- Boeing's recruitment policies and procedures ensure its hiring practices comply with all applicable labor laws and promote fair employment.
- Supplier contracts have a section on business conduct with specific language addressing compliance with laws, supplier code of conduct expectations, and maintaining an ethics and compliance program. Furthermore, Boeing requires suppliers to submit combating trafficking in persons certifications where required by law.

<sup>7</sup> Boeing's supplier code is based on the model supplier code created by the International Forum on Business Ethical Conduct for the Aerospace and Defense Industry (IFBEC); Boeing is an IFBEC member.

- Finally, Boeing deploys [training](#) to raise awareness of modern slavery, how to spot it, how to report concerns and reinforcing our commitment to addressing this topic.

## 2. Identify and Assess Adverse Impacts

Boeing's controls are premised on a risk-based approach that starts with identifying where modern slavery risk likelihood is elevated (inherent risk). This analysis is predominately focused on the supply chain procurement categories and global supplier locations taking into account external sources of information such as [Walk Free's 2023 Global Slavery Index](#), verification and trend data from 3<sup>rd</sup> party sustainability management practices assessments that include a modern slavery component. Suppliers in an elevated inherent risk category, without a recent sustainability management practices assessment, are engaged to complete one to determine if further action on modern slavery controls is needed (residual risk). In addition to the risk-based approach, all Boeing operations, suppliers, known sub-tier suppliers and allegations to Boeing's ethics reporting lines are continuously monitored for modern slavery concerns. As a standard practice, Boeing does not conduct independent, unannounced physical inspection of suppliers' operations for signs of modern slavery concerns.

## 3. Handle Adverse Impacts

When appropriate, tailored corrective action plans with concise criteria and schedule are used to mitigate risk before it becomes an adverse impact requiring remediation.

## 4. Track Implementation and Results

In 2024, enterprise efforts began to define a common set of metrics to track implementation of controls and their effectiveness.

## 5. Communication

Communication occurs in three primary pathways. First, through transparent compliance disclosures such as this enterprise modern slavery statement. Second, ongoing engagement with relevant internal stakeholders that manage risk in their business units to elevate awareness of modern slavery and determine risk-based actions where warranted. Third, working through industry groups including the [International Aerospace Environmental Group](#) and [Responsible Business Alliance's Responsible Minerals Initiative](#) to identify opportunities for positive impact and heightening awareness of modern slavery throughout the supply base.

## 6. Remediation

If Boeing identifies and substantiates instances where it has caused or contributed to adverse impacts, our corporate remediation plan is tailored to the specific situation to comply with laws and restore the affected person or persons. When remediation involves a supplier, resolving root causes is prioritized over immediately ending the business relationship.

## Controls Effectiveness

Boeing's governance of human rights occurs at multiple levels of the company from enterprise oversight to empowered regional organizations. Each of the Boeing entities covered by this statement participate in Boeing's enterprise [Compliance Risk Management program](#) which entails senior leaders held accountable for identifying, assessing and managing effective compliance programs. Modern slavery



controls are addressed in this annual enterprise process that culminates in a report to the Audit Committee of Boeing's Board of Directors.

At a local level, first line functional leaders collaborate with enterprise functional leaders to assess the presence and effectiveness of modern slavery compliance controls. In Boeing Australia Holdings, this process also involves oversight from the Modern Slavery Compliance Committee<sup>8</sup>. The approach is predominately qualitative but yields identification of opportunities for improvement and prioritization for the subsequent calendar year at local and enterprise levels.

For supply base insights on effectiveness of modern slavery compliance controls in the aerospace and defense industry, Boeing participates in industry association led supplier sustainability assessment programs. At an enterprise level, Boeing engages via the International Aerospace Environmental Group's [program](#) with access to indicators based on 5,000+ completed sustainability assessments. Boeing Defence UK also participates in a regional program with access to 4,000+ completed assessments. Access to these industry data sets also affords comparing Boeing's modern slavery risk management practices to industry benchmarks.

## Progress Against 2023 Statement Commitments

During 2024, BAH, BDUK and BUKL made the following progress against commitments disclosed in their respective 2023 reporting year modern slavery statements. The BCOL 2023 reporting year statement did not include commitments.

### BAH

Commitment	Action
BAH, BAA, BDA and Insitu Pacific select highest risk suppliers for modern slavery risk deep dive <sup>9</sup>	<ul style="list-style-type: none"><li>• High risk suppliers identified by procurement category, location and strategic importance</li><li>• Suppliers engaged to complete a human rights management practices assessment</li><li>• Review of supplier modern slavery statements</li></ul>
Deploy updated Boeing enterprise modern slavery risk management training <sup>10</sup> to Supply Chain, Quality and Human Resources functions	<ul style="list-style-type: none"><li>• Boeing enterprise modern slavery <a href="#">training</a> deployed to employees and select suppliers; integrated into onboarding of onsite contractors and new suppliers</li></ul>
Support Boeing enterprise initiatives regarding deployment of an industry voluntary standard supplier sustainability assessment, supplier acknowledgement of Boeing's Supplier Code of Conduct, and evolving stakeholder communications	<ul style="list-style-type: none"><li>• Supplier engagement campaign to reinforce Boeing Supplier Code of Conduct expectations</li><li>• Alignment with enterprise supplier contract terms addressing human rights</li></ul>

<sup>8</sup> Established in 2019, it is comprised of supply chain leaders from all BAH entities and led by an appointed Modern Slavery Compliance Officer. The committee meets monthly to drive awareness about modern slavery, assess risk and govern compliance controls.

<sup>9</sup> Deep dive includes desktop research, review of modern slavery statements (if applicable) and other relevant disclosures, modern slavery questionnaire and discussion of findings with each selected supplier.

<sup>10</sup> Training addresses how to recognize modern slavery and processes for reporting and handling allegations.

## BDUK and BUKL

Commitment	Action
Monitor and assess supplier modern slavery risk using 3 <sup>rd</sup> party tools and UK Government's Modern Slavery Assessment Tool (MSAT)	<ul style="list-style-type: none"><li>• 3rd party tools such as JOSCAR utilised to run frequent reports, enabling analysis of supplier Modern Slavery compliance and associated risks.</li><li>• High risk suppliers identified, and further information requested where required to support risk mitigations.</li></ul>
Integrate modern slavery risk assessment tool results into supply chain business processes	<ul style="list-style-type: none"><li>• Ongoing training and awareness sessions to ensure risk assessment results are reviewed and monitored across the supply chain.</li></ul>
Deploy updated Boeing enterprise modern slavery risk management training to local employees	<ul style="list-style-type: none"><li>• Boeing enterprise modern slavery <a href="#">training</a> deployed to employees and integrated into onboarding training processes.</li></ul>
In support of the Public Services (Social Value) Act 2012, flow the social value themes	<ul style="list-style-type: none"><li>• Social Value themes are flowed down to suppliers at all relevant levels throughout the procurement process from initial sourcing, contracting and delivery.</li></ul>

## Areas of Focus in 2025

During 2025, Boeing will further its enterprise emphasis on embedding and refining our human rights commitments, including modern slavery risk management controls, throughout its operations, supply chain, and industry partnerships. Specific potential multi-year actions include:

- Collaborating with peers to refine human rights risk analysis techniques and insights
- Progressing sustainability assessments of suppliers identified as high inherent human rights risk and/or critical to lines of business
- Establishing enterprise standard key performance indicators (KPIs) to further enable governance of controls implementation and effectiveness assessment
- Evolving controls to meet current and future human rights due diligence legislation globally

## Consultation Process

Boeing addresses human rights compliance obligations at an enterprise level via an integrated approach spanning stakeholders from multiple Boeing entities, global locations and functions. This enterprise approach cultivates holistic understanding of global compliance obligations, compliance controls alignment and effective governance. Key participants include representatives from Supply Chain, Compliance, Law and local risk management teams such as Boeing Australia's Modern Slavery Compliance Committee. This modern slavery statement was jointly created by these stakeholders, including individuals accountable for compliance with the Acts. Functional and Boeing entity leaders, including in-scope Boeing entities' Boards of Directors, were included in a series of oversight reviews culminating in approval of this statement.



## Attestations

### Boeing Australia Holdings Pty Ltd

The Boeing Modern Slavery Statement 2024 is made on behalf of Boeing Australia Holdings Pty Ltd and its subsidiaries and was approved by the Board of Directors of Boeing Australia Holdings Pty Ltd, on 13 May 2025, in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*.



Maria Fernandez  
Chair of Boeing Australia Holdings and President, Boeing Australia, New Zealand and South Pacific



Amy List  
Director of Boeing Australia Holdings Pty Ltd



Peter Johnson  
Director of Boeing Australia Holdings Pty Ltd



Andrew Duggan  
Director of Boeing Australia Holdings Pty Ltd



Adnan Raghdoo  
Director of Boeing Australia Holdings Pty Ltd



Jonathan Carbines  
Director of Boeing Australia Holdings Pty Ltd



Erika Pearson  
Director of Boeing Australia Holdings Pty Ltd

### Boeing Canada Operations Ltd

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of President of Boeing Canada Operations Limited, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

I have the authority to bind Boeing Canada Operations Limited.



Full name: Al Meininger  
Title: President, Boeing Canada Operations Limited  
Date: April 22, 2025

The Board of Directors of BCOL has approved the Boeing Modern Slavery Statement 2024 on behalf of BCOL in accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.



## Boeing UK

The Boeing Modern Slavery Statement 2024 is made on behalf of Boeing UK (including Boeing Defence UK Limited, Boeing United Kingdom Limited and Boeing Commercial Aviation Services Europe Limited) pursuant to section 54(1) of the *Modern Slavery Act 2015* (Act). It has been approved by the Boards of Directors of Boeing UK businesses with obligations to report under the Act and signed on 9<sup>th</sup> May 2025.

Steve Burnell

Director of Boeing Defence  
UK Limited

Maria Lane

Director of Boeing United  
Kingdom Limited

Dominic Allen

Director of Boeing Commercial  
Aviation Services Europe Limited