



# Supplier Code of Conduct

## Our Core Values

Boeing is committed to a set of core values that includes transparency, integrity, accountability, and respect. You can read about our core values—and we ask that you do—at [www.boeing.com/principles/values.page](http://www.boeing.com/principles/values.page). These values serve as guiding principles for all that we do at Boeing, while compliance, ethical behavior, and sustainability serve as the foundation for Boeing and our supply chain.

Boeing is a member of the International Forum on Business Ethical Conduct (IFBEC), and The Boeing Supplier Code of Conduct outlines expected behaviors for all suppliers, including their employees and agents, building upon the voluntary model created by the IFBEC.

We expect suppliers to adhere to the Boeing Supplier Code of Conduct throughout the time they do business with us and notify Boeing of any instances where expectations are not met.



“Ethical, responsible and sustainable business conduct is at the core of how Boeing operates, and these core principles extend to our strategic partners and suppliers. Setting a high standard and mutual foundation will allow us to continue to make progress to earn the trust of our stakeholders, customers, flying public, as well as demonstrate transparency and integrity to ensure compliance and enable a sustainable aerospace industry.”

**William A. Ampofo II**, Vice President, Supply Chain, Boeing Global Services, and Chair, Supply Chain Operations Council

# Governance

## Policies and Boeing Supplier Code of Conduct

We expect suppliers to implement and adhere to their own written code of conduct, consistent with the expectations of this Boeing Supplier Code of Conduct, and to flow down their principles to the suppliers they work with in providing products and/or services. We expect suppliers to maintain effective programs that require their employees to make ethical, values-driven choices in their business dealings, and reinforce those requirements through frequent communications.

## Help and Guidance

We expect suppliers to provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting. We expect suppliers to take action to prevent, detect, and correct retaliatory actions.

## Compliance with Laws

Suppliers must comply with all laws and regulations applicable to their business, including the local laws and regulations of all countries outside their home country in which operations are managed or services are provided.

## Anti-Corruption Laws

Suppliers must comply with the anti-corruption laws, directives, and regulations that govern operations in the countries in which they do business, regardless of local customs, including the U.S. Foreign Corrupt Practices Act.

We expect suppliers to conduct due diligence to prevent and detect bribery and corruption in all business arrangements, including partnerships, the engagement of contractors and sub-contractors, joint ventures, offset agreements, and hiring of third-party intermediaries, such as agents or consultants.



## Illegal or Improper Payments

Suppliers must not offer, directly or indirectly, any illegal or improper payments to, or agree to receive any illegal or improper payments from, any customer, supplier, their agents, representatives, or others. We expect suppliers to prohibit their employees from receiving, paying, and/or promising sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage. This prohibition applies even in locations where such activity may not violate local law or custom.

This includes a prohibition on so-called “facilitation” or “grease” payments intended to expedite or secure performance of a routine governmental action, such as obtaining a visa or customs clearance, unless there is a formal legal governmental fee schedule for such expediting services and the government provides receipts. Personal safety payments are permitted where there is an imminent threat to health or safety.

## Gifts or Business Courtesies

We expect suppliers to compete on the merits of their products and services. Suppliers must not use the exchange of business courtesies to gain an unfair competitive advantage. In any business relationship, suppliers must ensure that the offering or accepting of any gift or business courtesy is permitted by applicable laws and regulations, and that these exchanges do not violate the rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices. No cash gifts or cash equivalent should be offered or accepted.

## Conflict of Interest

We expect suppliers to avoid all conflicts of interest or situations that give rise to the appearance of a potential conflict of interest. Suppliers must provide immediate notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between Boeing's interests and the interests of a supplier, a supplier's employees or its employees' close relatives, friends, or associates.

## Maintain Accurate Records

We expect suppliers to have in place appropriate controls to accurately and securely create, store, and maintain business records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records must be retained based on the applicable retention requirements.

## Fraud and Deception

Suppliers must not engage in fraud, deception, or misleading conduct, or allow others acting on their behalf to do so. We expect suppliers to act with integrity and transparency in all dealings and interactions with Boeing and other parties, including government or regulatory authorities, and Boeing's customers. When suppliers determine or discover that a false or misleading statement or material omission of any kind has been made, whether intentional or inadvertent, they must take immediate steps to identify the inaccurate statement and provide accurate information. These obligations encompass all aspects of suppliers' business, including and especially any matters that relate to the operation, quality, safety, or regulatory compliance of suppliers' products or services.

## Insider Trading

Suppliers and their personnel must not use any material or non-publicly disclosed information obtained in the course of their business relationship with Boeing as the basis for trading or for enabling others to trade in the stock or securities of any company.

## Competition and Antitrust

Suppliers must not enter into formal, informal or implied anti-competitive arrangements that fix prices, collude, rig bids, limit supply, or allocate/control markets. They must not exchange current, recent, or future pricing information with competitors. Suppliers must not participate in a cartel or any activity that would unlawfully restrain or impact competition.

## Management of Risk

We expect suppliers to actively manage risk and not pass down risk inappropriately to subcontractors or third parties. Suppliers should share information on risk to ensure risk can be mitigated.

## Imports and Exports

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives, and regulations governing the import and export (including re-export) of parts, components, software, technical data, and services. Suppliers must provide accurate and complete information and obtain authorizations where necessary.



## Sanctions and Embargoes

Suppliers must ensure that their business practices are in accordance with all applicable laws, directives, and regulations governing embargoes, sanctions, economic sanctions, and sanctions that may curtail the transfer of parts, components, and technical data and services to third parties. Suppliers must provide accurate and complete information and obtain authorizations where necessary.

## Payment of Taxes

Suppliers must ensure they comply with all applicable tax laws and regulations in the countries where they operate and be open and transparent with the tax authorities. Under no circumstances should suppliers engage in deliberate illegal tax evasion or facilitate such evasion on behalf of others.

As such, suppliers are expected to put in place effective controls to minimize the risk of tax evasion or its facilitation and provide appropriate training, support, and whistleblowing procedures to ensure their employees understand and implement them effectively and can report any concerns.

## Timely Payment of Suppliers

We expect suppliers to be fair and reasonable in their payment practices and pay undisputed and valid invoices on time, in accordance with agreed contractual payment terms.



# People

## Health and Workplace Safety

We expect suppliers to establish an appropriate workplace safety management system (e.g., ISO45001 or equivalent), including policies and processes to ensure compliance with applicable safety and health laws and regulations; to protect the health, safety, and welfare of employees, contractors, visitors, and others who may be affected by the supplier's activities; and to strive to eliminate fatalities, work-related injuries, and exposure of individuals to safety hazards.

Consistent with applicable laws and regulations, suppliers must ensure that each employee's performance and safety is not impaired by alcohol, controlled substances, or drugs, whether legal or illegal.

## Equal Employment Opportunity—Equity, Diversity, and Inclusion

We expect suppliers to foster an equitable, diverse, and inclusive work environment where employees are treated with respect and fairness.

Suppliers are expected to commit to principles of equal employment opportunity; promote equity, diversity, and inclusion throughout the workforce; and comply with all non-discrimination laws and regulations.

Suppliers must ensure employment, including hiring, payment, benefits, advancement, termination, and retirement, is based on ability and not any personal characteristics.

## Harassment

We expect suppliers to ensure that their employees are afforded an employment environment that is free from intimidation; physical, psychological, sexual, and verbal harassment; or other abusive conduct.

## Wage, Benefits, and Working Hours

Suppliers must pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required, or in those countries where such laws do not exist, at least equal to their regular hourly payment rate. Suppliers must not permit deduction from wages as a disciplinary measure nor permit any other deductions that are not provided by national law.

We expect suppliers to provide employees with regulated hours of work, daily and weekly rest periods, and annual leave.

## Disciplinary and Grievance Mechanism

We expect suppliers to have an employee disciplinary process in place to address concerns regarding employee work, conduct, or absence.

We expect suppliers to have a grievance mechanism for employees to raise a workplace problem or concern, or to appeal a disciplinary decision.

## Social Dialogue and Freedom of Association

We expect suppliers to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference, or reprisal.

We expect suppliers to recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing within the appropriate national legal framework.

## Products and Services

### Product & Service Safety and Quality

We expect suppliers to comply with all laws and regulations governing product safety and quality, and to deliver products and/or services that conform to such product safety and quality standards.

We expect suppliers to have established quality assurance processes to identify any defects and implement corrective actions.

### Counterfeit Parts

We expect suppliers to develop, implement, and maintain effective methods and processes appropriate to their products, to minimize the risk of counterfeit parts and materials being delivered. Effective processes should be in place to detect, report, and quarantine counterfeit parts and materials and to prevent such parts from re-entering the supply chain. If counterfeit parts and/or materials are detected or suspected, suppliers must provide immediate notification to the recipients of such counterfeit parts and/or materials.

### Product Chemical Transparency

We expect suppliers to provide Boeing up-to-date regulated chemical composition information of their products, to enable safe usage and regulatory compliance throughout the product lifecycle.

We expect suppliers to stay informed on current and emerging global chemical regulations, to ensure production continuity and compliance of others throughout the value chain.



# Operations

## Environment

We expect suppliers to conduct their business in a manner that actively manages environmental risks across their operations, products, and supply chain.

Suppliers are expected to establish an appropriate environment management system (e.g., ISO 14001 or equivalent), including policies and procedures aimed at effectively managing their environmental performance, and integrating environmental considerations into their product design or service.

Boeing considers climate change to be an urgent issue and expects suppliers to innovate in order to reduce the impact of their products, services, and operations on climate change.

We expect suppliers to improve the efficiency of their energy, water, and natural resource usage, to minimize hazardous waste materials, to dispatch goods in adequate outer packaging and foster reusable/recycled packaging materials, and to responsibly manage their air emissions.

We expect suppliers to collaborate with Boeing to improve the processes and systems throughout the product lifecycle to protect the environment. Over time, we expect suppliers to establish environmental sustainability priorities and report their progress.



## Intellectual Property

Suppliers must comply with all the applicable laws governing intellectual property rights assertions, including protection against unauthorized disclosure.

## Protecting Sensitive, Confidential, and Proprietary Information

Suppliers must ensure that all sensitive, confidential, and proprietary information is appropriately protected in accordance with our contractual agreements, and all applicable laws and regulations.

Suppliers may not use, disclose, or distribute Boeing information for any purposes beyond the scope of their contracted work with Boeing, without Boeing's prior written authorization.

Suppliers must comply with applicable data privacy laws on the collection, processing, and transfer of personal data and information.

Suppliers must protect the sensitive, confidential, and proprietary information owned by Boeing and of others, including personal data/information, from unauthorized access, destruction, use, modification, and disclosure, through appropriate physical and electronic security procedures.

## Cybersecurity

We expect suppliers to understand the cybersecurity landscape, including requirements from Boeing and governments worldwide.

In order to protect both commercial and defense-related businesses and support our operations, Boeing has adopted security principles in accordance with the National Institute of Standards and Technology (NIST) Cybersecurity Framework and expects similar efforts from suppliers to adequately protect the supply chain. We expect suppliers to adopt security practices in accordance with an industry-leading security framework such as ISO 27001 or the NIST Cybersecurity Framework.

Suppliers must ensure that products delivered to Boeing satisfy relevant cyber-related regulations for product safety, airworthiness, and quality, and are free from cyber risks.



# Community

## Human Rights

We expect suppliers to conduct their business and operations in a way that respects human rights.

Suppliers are expected to identify risks and actual adverse human rights impacts related to their activities and business relationships. Suppliers are expected to take appropriate steps to reduce risk and ensure their operations do not contribute to human rights abuses and to remedy any adverse impacts directly caused by, or contributing to, their activities or business relationships.

## Child Labor

Suppliers are expected to ensure that illegal child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed, and/or the minimum working age defined by the International Labour Organization (ILO), whichever is higher.

## Modern Slavery

Suppliers must prevent any involvement in all forms of modern slavery, including human trafficking and forced, bonded, or indentured labor. All work should be voluntary on the part of the employee.

We expect suppliers to provide all employees with a written contract in a language that the employee understands clearly indicating their rights and responsibilities with regard to wages, working hours, benefits, and other working and employment conditions. Suppliers must not destroy, conceal, confiscate, or otherwise deny access to any form of employee identification (e.g., passports or work permits) as a condition of employment, unless required by applicable law.

Suppliers must not charge employees fees, recruitment costs, or deposits, directly or indirectly, as a precondition of work.

Suppliers must respect the right of workers to terminate their employment after reasonable notice and to receive all owed salary. Suppliers must respect the right of workers to leave the workplace after their shift (see also Wage, Benefit, and Working Hours).

## Responsible Sourcing of Minerals

We expect suppliers to provide products made from responsibly sourced materials, including constituent minerals that are sourced responsibly and support efforts to eradicate the use of any minerals which directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. We expect suppliers to conduct due diligence and provide source data and supply chain-of-custody for these minerals when requested.



# Speak Up

## Contact Us

Thank you for being committed to the principles expressed in this Code. To speak up, seek guidance, or report concerns, contact Boeing's Ethics organization: US Ethics Line (888-970-7171) or via the confidential and anonymous reporting system (includes global hotline numbers) <https://integritycounts.ca/org/boeingweb>.