## 2023 Boeing **Sustainability Report**

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# Ethical and Compliant Business

Boeing recognizes that the company's long-term interests are advanced when employees are responsive to the concerns of employees, customers, public officials, investors, suppliers and the communities we serve. This starts with our Board who actively fosters a corporate culture that puts safety, quality, integrity and sustainability at the forefront of all that we do.

Board members commit to, and use, a Code of Ethics as guiding principles; the Code emphasizes the importance of compliance with all applicable laws, rules and regulations; maintaining confidentiality; avoiding any conflicts of interest; and reporting of illegal or unethical behavior.

The Audit Committee and the full Board oversee our compliance and ethics programs through close collaboration with Boeing's Chief Compliance Officer and periodic reviews of program metrics. These touch points provide visibility to the Board of significant compliance and ethics risks, as well as specific cases that are identified through the company's various reporting channels.

Learn more about our Ethics and Compliance Program.

#### The Boeing Code of Conduct

At Boeing, our first commitment is to the people and customers who rely on our products and services to protect. connect and explore our world and beyond. Each Boeing employee has a personal responsibility to honor that promise and to serve as stewards of Boeing's legacy of aerospace excellence and innovation. New employees sign the Code of Conduct and complete Recommitment training when they join the company — and we all reaffirm this commitment every year. Learn more about our Code of Conduct and Recommitment.

Our annual Code of Conduct signing and Recommitment remind all of our employees of their obligation to speak up and be a voice for others when something does not align with our values.

## **Robust Anti-Corruption Program**

Integrity is a core company value and Boeing strictly forbids bribery and corruption of any kind. Boeing's robust anticorruption program includes extensive controls, rigorous policies and procedures, and an annual risk assessment to ensure effectiveness and identify potential enhancement opportunities. Learn more about our anti-corruption program.

Boeing publishes an internal policy that explains its anticorruption and anti-bribery requirements and expectations for employees, while making its guidelines for ethical business conduct publicly available to employees and other stakeholders. The company also makes employees aware of their federally protected whistleblower rights, which are designed to protect employees against retaliation for reporting potential wrongdoing by a U.S. contractor or subcontractor.

# Understanding Ethical Concerns: 2022 Data<sup>1</sup>

2,405 inquiries<sup>2</sup>

conflict of interest determinations

3,132 investigative requests3

total contacts to Ethics and Business Conduct

of investigated requests were substantiated4

2,507

of investigative requests had enough information to investigate

- 1. Data reflects the reporting period of November 2021 through October 2022
- 2. Inquiries comprise Requests for Guidance and Information Requests. Requests for Guidance are situations where employees are seeking quidance when facing ethical dilemmas or when they need assistance in understanding company policies or expected behaviors. Information Requests are situations where employees are seeking general information. Both demonstrate awareness of Boeing's Compliance and Ethics program, but Requests for Guidance are viewed as the most positive types of contact.
- 3. Investigated matters are considered unsubstantiated when investigation findings demonstrate that no misconduct occurred or where there is a lack of evidence to support a finding of misconduct.
- 4. Ongoing evaluations demonstrate that Boeing's substantiation rate is slightly higher than other published benchmarks, indicating an effective investigation process and informed reporting by company employees.

# **Contacting Ethics**

Boeing encourages employees, subsidiaries, suppliers and external stakeholders to promptly raise concerns about safety, quality or potential violations of the law or Boeing policies. For more information, visit our Boeing Ethics website.