



The Boeing Company

Modern Slavery Statement

Data from January – December 2025 | Published 2026



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, 2025. 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’), Boeing Defence UK Limited (‘BDUK’) and Boeing Commercial Aviation Services Europe Ltd (‘BCASEL’) to disclose modern slavery controls in its operations and supply chains, including 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 include transparency, integrity, accountability and respect. 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 respects and values human life and human rights and does not tolerate any form of modern slavery¹. 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, with their respective structure, operations and supply chains addressed below.

Boeing Australia Holdings Pty Ltd (‘BAH’)

BAH (ACN 101 168 932) is the holding company for Boeing in Australia comprised of multiple subsidiaries², 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 2025.

Entity	Operations	Supply Chain
BAH	Location: Sydney, and various Australian locations Employees: 204 (0% union employees) A corporate services entity for communications, legal, tax, information technology, global trade controls and human resources functions	70 suppliers Location by spend: Australia 97%, USA/Canada 3% Spend categories: IT Hardware & Maintenance 40%, Software 24%, External Labour Hire 16%, Telecommunications 7%, Other 13%

¹ Including servitude, forced labor, child labor, exploitation, human trafficking, debt bondage, and deceptive recruiting.
² Additional BAH subsidiaries include Boeing Distribution Australia Pty Ltd (ACN 006 224 764) and Wisk Australia Pty Ltd (ACN 674 613 346).



Entity	Operations	Supply Chain
BAA	<p>Location: Port Melbourne; Fishermans Bend</p> <p>Employees: 1094 (~82% union employees)</p> <p>Produces composite commercial aircraft flight control surfaces, develops materials and process technology, performs automated assembly and paint</p>	<p>502 suppliers</p> <p>Location by spend: Australia 74%, USA & Canada 20%, Europe 3%, Asia & Other 3%</p> <p>Spend categories: Metallic Parts 24%, Composite materials & Parts 19%, Materials & Standards 17%, Facilities 13%, Services 10%, Capital Equipment & Tooling 9%, Freight/Logistics 4%, Systems (Avionics) 2%, Interiors Parts 2%</p>
BDA	<p>Location: Brisbane, various Australia locations</p> <p>Employees: 3291 (13% union employees)</p> <p>Provides engineering, product support, training, and maintenance services</p>	<p>704 suppliers</p> <p>Location by spend: Australia 58%, USA & Canada 37%, Europe 5%</p> <p>Spend categories: Aviation Maintenance & Repair 38%, Avionics Components & Manufacturing 15%, Labour Hire 6%, Software 4%, Spares 4%, Research & Development 4%, Components 6%, Construction 2%, Hardware 2%, Other 19%</p>
Insitu Pacific	<p>Location: Brisbane</p> <p>Employees: 134 (0% union employees)</p> <p>Produces uncrewed aerial systems, provides related maintenance and training services</p>	<p>6 suppliers</p> <p>Location by spend: USA/Canada 90%, Australia 10%</p> <p>Spend categories: Ground equipment 32%, Services 32%, Aviation components 26%, Payloads 10%</p>

Boeing Canada Operations, Ltd ('BCOL')

BCOL (2024811602) is the holding company for Boeing in Canada employing ~1,800 people in Canada. It is largely a corporate services entity and operates the corporate head office in Ottawa ('Boeing Canada Ottawa' or 'BCO'), with sites in Winnipeg ('Boeing Canada Winnipeg' or 'BCW') and Vancouver ('Boeing Canada Vancouver' or 'BCV'). Other Boeing subsidiaries operate in Canada³, 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 2025.

Entity	Operations	Supply Chain
BCOL	<p>Location: Ottawa/ Petawawa/ Trenton/ Toronto/ Calgary</p> <p>Employees: 187 (0% union employees)</p> <p>Performs strategic planning and business development activities</p>	<p>22 suppliers</p> <p>Location by spend: Canada 100%</p> <p>Spend categories: Facilities & Maintenance 62%, Office Equipment & Supplies 38%</p>
BCW	<p>Location: Winnipeg</p> <p>Employees: 1534 (76% union employees)</p>	<p>444 suppliers</p> <p>Location by spend: USA 50%, Canada 49% Other 1%</p> <p>Spend categories: Operating Services & Supplies 55%, Non-Metallic Raw Materials 17%, Machined</p>

³ Additional Boeing wholly owned subsidiaries in Canada include Boeing Distribution Canada Ltd, Boeing Distribution Services Canada Inc, and Wisk Canada Inc.



Entity	Operations	Supply Chain
	Produces composite commercial aircraft parts and assemblies	Parts & Metals 11%, Heat Shields & Insulation Blankets 11%, Assemblies & Components 3%, Paints & Adhesives 1%, Standards 1%, Composites & Core Details 1%
BCV	Location: Vancouver Employees: 220 (0% union employees) Produces commercial aviation operations software	47 suppliers Location by spend: USA 88%, Canada 11%, Other 1% Spend categories: Software 84%, Professional Services 15%, IT hardware 1%

Boeing UK

Boeing’s UK entities include Boeing Defence UK Ltd (01290439), Boeing United Kingdom Ltd (04355070) (‘BUKL’), and Boeing Commercial Aviation Services Europe Ltd (8186759) (‘BCASEL’), each of which are reporting entities under the UK *Modern Slavery Act 2015* for 2025⁴.

Entity	Operations	Supply Chain
BDUK	Location: Bristol; Various UK locations Employees: 1934 Performs modifications and sustainment of rotorcraft and fixed wing defense platforms. Provides defense logistics, engineering, and training services	378 suppliers Location by spend: UK 80%, USA 16%, Spain 2%, Other 2% Spend categories: Materials & Spares 51%, Software & Services 25%, Professional Services 11%, Logistics 3%, Construction 3%, Facilities 3%, Software & Computing 2%, Other 2%
BUKL	Location: Various UK locations Employees: 640 Business support service activities	241 suppliers Location by spend: UK 66%, USA 15%, Germany 12%, New Zealand 5%, Other 2% Spend categories: Professional Services 35%, Facilities 21%, Materials & Spares 19%, Travel Expenses 17%, Research & Development 4%, Computing 2%, Other 2%
BCASEL	Location: Various UK locations Employees: 302 Commercial aircraft maintenance engineering, modifications and technical publications	165 suppliers Location by spend: UK 95%, Germany 2%, Other 3% Spend categories: Repairs & Maintenance 32%, Travel Expenses 14%, Intercompany Support 13%, Contract Labour 9%, Facilities 8%, Office Supplies 7%, Computing Equipment 5%, Professional Services 4%, Assignment Expenses 4%, Communication 1%, Other 3%

⁴ Following Boeing’s acquisition of Spirit Aerosystems in December 2025, Short Brothers PLC (NI001062) and Spirit Aerosystems Holdings Ltd (11330860) also form part of Boeing UK. Those entities will be reporting separately from this statement for January-December 2025.



Risk Assessment

Boeing operates in sophisticated and advanced technology industries in a highly regulated environment with highly skilled workforces. Boeing’s direct suppliers also generally operate in that environment. Accordingly, Boeing considers the risk of directly causing or contributing to modern slavery through its operations and supply chains in the UK, Australia and Canada to be ‘low’. Additionally, no substantiated concerns were found in relation to Boeing’s own activities, or the activities of its direct suppliers for the listed entities in this statement. However, it is acknowledged that no part of the world is immune to the risks of modern slavery. Boeing will continue to seek to optimise its reporting and assessment process (including the use of digital tools) for itself and its supply chain.

The inherent risk analysis method integrates external⁵ and internal⁶ sources of information to provide a holistic assessment of our supply chains, and results are shown below.

Inherent Risk Category	Inherent Risk Type
Purchased Services	Risk of being linked to modern slavery practices through sub-tier suppliers of construction, freight and other transportation services, accommodation, catering, cleaning, and security services
Purchased Goods	Risk of being linked to modern slavery practices through sub-tier suppliers of raw materials, apparel, textiles, electronics, and/or wiring
Geographic risks	Risk of being 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 Mexico

Policies and Due Diligence Processes

Boeing develops and 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 are at different stages of implementation for the enterprise standard compliance controls listed and have the option to implement additional controls.

⁵ 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 ~7,000 sustainability assessments.

⁶ Internal data sources include allegations submitted to Boeing’s ethics line, oversight reviews of Boeing’s hiring practices and supplier due diligence.

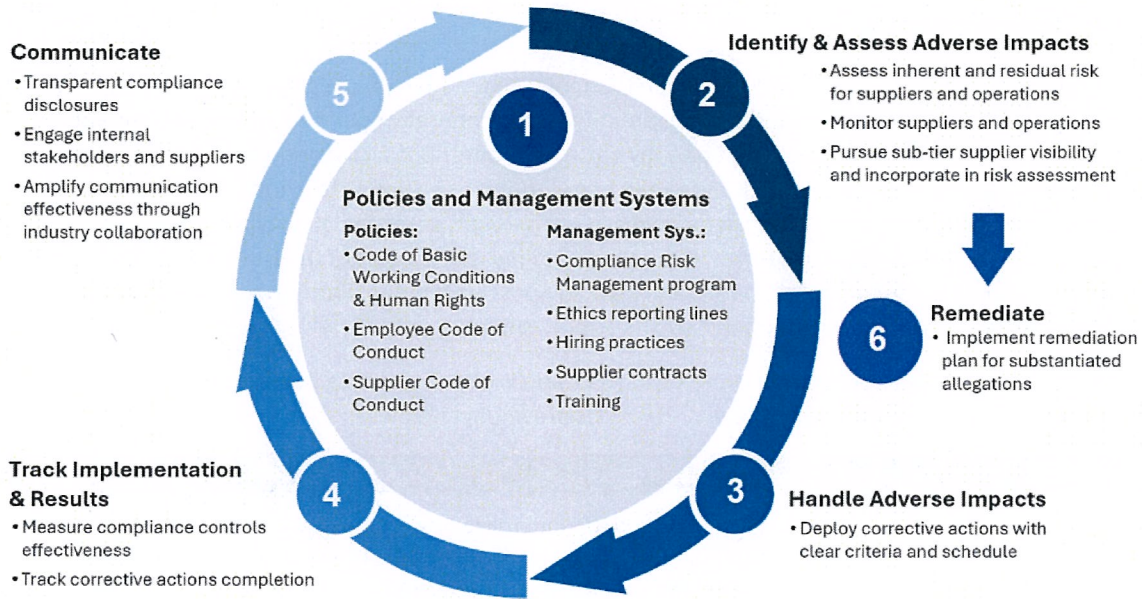


Figure 1 Boeing enterprise modern slavery compliance controls aligned to OECD Due Diligence Guidance for Responsible Business Conduct (OECD, 2018) framework.

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](#)⁷. These codes include Boeing’s firm commitment to the protection and advancement of human rights in our worldwide operations & supplier relationships, with the expectation that all Boeing employees and suppliers support this commitment. Compliance and ethical behavior are everyone’s responsibility; it is not only the right thing to do but is critical to long-term success.

Boeing deploys multiple central management systems that monitor its 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 Boeing employees and external parties (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 Combatting Trafficking in Persons certifications where required by law. Finally, Boeing deploys [training](#) to raise awareness of modern slavery, including how to identify and report concerns, reinforcing the company’s commitment to addressing this topic.

⁷ 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.



2. Identify and Assess Adverse Impacts

Boeing's enterprise controls architecture is premised on a risk-based approach that starts with identifying where modern slavery risk likelihood may be 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](#), as well as verification and trend data from 3rd party sustainability management practices assessments that include modern slavery risk topics. Suppliers in an elevated inherent risk category without a recent sustainability management practices assessment would then be engaged to complete one to determine if further action on modern slavery controls is needed (residual risk). In addition to the risk-based approach, allegations received through Boeing's ethics reporting lines regarding Boeing's operations or its suppliers 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 would be used to mitigate risk before it becomes an adverse impact requiring remediation.

4. Track Implementation and Results

In 2025, further assessment was conducted on metrics pertaining to the future deployment of an enterprise digital supplier code of conduct acknowledgement to entities included in this statement, as well as supplier residual risk data available in the 3rd party supplier risk assessment tool that Boeing currently uses.

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, the corporate remediation plan would be tailored to the specific situation to comply with laws. When remediation involves a supplier, and where appropriate, resolving root causes is prioritized over immediately ending the business relationship.

Controls Effectiveness

Boeing's governance of human rights compliance controls 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](#), wherein senior leaders are accountable for identifying, assessing and managing effective compliance programs.



Modern slavery controls are addressed in this annual enterprise process, culminating 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 BAH, this process also involves oversight from the Modern Slavery Compliance Committee⁸. 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 (‘IAEG’) [program](#) with access to indicators based on 7,000+ completed sustainability assessments. Boeing Defence UK also participates in a regional program with access to 6,000+ completed assessments. Access to these industry data sets also affords comparing Boeing’s modern slavery risk management practices to industry benchmarks.

Progress Against 2024 Statement Commitments

During 2025, reporting entities made the following progress against commitments disclosed in the 2024 reporting year modern slavery statement for in-scope entities.

Commitment	Action
Evolving controls to meet current and future human rights due diligence legislation	<ul style="list-style-type: none"> - Supplier code of conduct digital acknowledgement capability launched at the enterprise level, with assessments continuing for future regional rollout
Progressing sustainability assessments of suppliers identified as high inherent human rights risk and/or critical to lines of business	<ul style="list-style-type: none"> - Select BAH and BDUK entities began readiness and planning for implementation of supplier due diligence process - BDUK integration team completed training on risk management tool capabilities in advance of supplier risk process implementation - BAH and BDUK obtained leadership support for risk-based supply chain due diligence process implementation plans, including designated integration resources and compliance risk management forums
Establishing enterprise standard key performance indicators (KPIs’) to further enable governance of controls implementation and effectiveness assessment	<ul style="list-style-type: none"> - Strategic identification and planning continued for KPIs for controls, anticipating future deployment in UK, Canada, and Australia entities

⁸ Established in 2019, the Modern Slavery Compliance Committee 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.

Commitment	Action
Collaborating with peers to refine human rights risk analysis techniques and insights	- Enterprise supplier residual risk assessment completions increased through collaboration with IAEG’s shared industry pool

Areas of Focus in 2026

During 2026, Boeing will continue 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.

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 KPIs to further enable governance of controls implementation and effectiveness assessment
- Evolving controls to meet current and future human rights due diligence legislation

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 an oversight review culminating in approval of this statement.



Attestations

Boeing Australia Holdings Pty Ltd

The Boeing Modern Slavery Statement 2025 is made on behalf of Boeing Australia Holdings Pty Ltd and its subsidiaries and was approved by the Chair of Directors of Boeing Australia Holdings Pty Ltd, on 29 April 2026 in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)*.

Steven Peter Robertson
Chair of Boeing Australia Holdings and President, Boeing Australia, New Zealand and South Pacific

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 Meinzinger
Title: President, Boeing Canada Operations Limited
Date: 27 April 2026

The Board of Directors of BCOL has approved the Boeing Modern Slavery Statement 2025 on behalf of BCOL in accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Boeing Defence UK Ltd, Boeing United Kingdom Ltd, and Boeing Commercial Aviation Services Europe Ltd

The Boeing Modern Slavery Statement 2025 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 30 April 2026

Thom Breckenridge	Sir Jeremy Quin	Dominic Allen
Director, Boeing Defence UK Limited	Director, Boeing United Kingdom Limited	Director, Boeing Commercial Aviation Services Europe Limited