



MODERN SLAVERY STATEMENT 2023

BOEING CANADA OPERATIONS LTD.



1. INTRODUCTION & STRUCTURE

Boeing Canada Operations, Ltd. (“BCOL”) is a wholly owned subsidiary of The Boeing Company (NYSE: BA), 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 human trafficking or modern slavery, including forced labour, child labour, debt bondage, and deceptive recruiting. Boeing is committed to complying with global laws and regulations aimed at combatting human trafficking and modern slavery and expects its business partners and suppliers to do the same. Boeing requires all employees, contractors and their employees, subcontractors, and agents to comply with all laws and regulations prohibiting all forms of modern slavery and human trafficking.

This report covers the 12 months ending 31 December 2023 and is made on behalf of BCOL.¹ BCOL is the holding company for Boeing in Canada. It is largely a corporate services entity and operates the corporate head office in Ottawa, with sites in Winnipeg (“Boeing Winnipeg” or “BCW”) and Vancouver (“Boeing Vancouver” or “BCV”). BCOL employs more than 1,800 people in Canada.²

Boeing’s long-standing partnership with Canada dates back to 1919, when Bill Boeing made the first international airmail delivery from Vancouver to Seattle. Today, Boeing and Canada have an extensive, mutually beneficial relationship. Canada is among Boeing’s largest non-U.S. supply bases, including Boeing production sites and external suppliers. BCOL facilities in Canada provide parts, components and assemblies for all of the company’s in-production commercial airplane models, along with software applications and consulting services for Boeing’s commercial and defence customers, including Air Canada and WestJet, and the Canadian Armed Forces.

¹ As a global enterprise, The Boeing Company’s subsidiaries in the United Kingdom and Australia independently disclose modern slavery statements in accordance with the UK Modern Slavery Act (2015) and the Australian Modern Slavery Act (2018). However, BCOL does not operate in and, therefore, does not submit a modern slavery statement in the United Kingdom or Australia.

² In addition to BCOL, the following Boeing subsidiaries also operate in Canada, and which are all wholly owned by The Boeing Company: Boeing Distribution Canada, Ltd; Boeing Distribution Services Canada, Inc.; Jeppesen (Canada) Ltd.; and Wisk Canada Inc. Of Boeing’s subsidiaries in Canada, only BCOL qualifies as a reporting entity for purposes of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (“the Act”). This report, therefore, primarily focuses on the operations and supply chains of BCOL.



Boeing partners with Canadian companies to develop new technology and has provided funding to support the Canadian Composites Manufacturing R&D Inc. consortium — a teaming of industrial and research organizations across Canada seeking to develop new composite manufacturing processes. In February 2013, Boeing became the founding industrial member of the University of British Columbia’s Composites Research Network, a group working with Canadian scientists to create practical applications of new composite manufacturing discoveries. In 2018, BCV joined Canada’s Digital Technology Supercluster as a founding member, partnering on augmented reality for aircraft maintenance and digital aviation records systems research projects. In June 2022, Boeing announced P-8 Industry partners, Team Poseidon-consisting of CAE, GE Aviation Canada, IMP Aerospace & Defence, KF Aerospace, Honeywell Aerospace Canada, Raytheon Canada, and StandardAero. Team Poseidon forms the cornerstone of the Canadian P-8 industrial footprint.

2. ACTIVITIES & SUPPLY CHAINS

Activities

Boeing Ottawa is home to Boeing Defense, Space & Security and Boeing Global Services in Canada. Boeing Ottawa also serves as BCOL’s primary Global Sales & Marketing office in the country. The office oversees strategic planning and business development activities for Boeing’s defence products and services to the Canadian government with a focus on new business, government relations and customer satisfaction.

BCW is the largest aerospace composite manufacturer in Canada. It employs approximately 1,500 people in 700,000 square feet of manufacturing and office space. BCW produces hundreds of end item composite parts and assemblies for Boeing Commercial Airplanes. Major products include wing to body fairings, engine strut forward fairings, engine strut aft fairings, landing gear doors, and engine inlet inner barrels.

BCV specializes in delivering solutions that improve operations management for the aviation industry. As a leading aviation-software provider, BCV’s innovative IT solutions help to streamline and optimize operations for its airline customers. For the past twenty years, BCV has helped businesses in the aerospace industry achieve better results with information technology products that support leaner, more efficient operations. While BCV’s product offering started with pioneering aviation maintenance solutions, it has evolved to include supplier-management, flight-monitoring, and aviation-marketing solutions.



Supply Chains

The vast majority of BCOL's supply chain supports BCW (~70% by spend). Principal purchased goods are aircraft structural assemblies, heat shields, insulation blankets, non-metallic raw materials, metallic machined parts, paints, adhesives, and fasteners from suppliers predominately in the United States (~58% of spend) and Canada (~41% of spend). BCV purchases information technology hardware, software, & services.

3. STEPS TAKEN IN 2023 to PREVENT & REDUCE FORCED & CHILD LABOUR RISKS

As of 2023, Boeing utilizes the *OECD Due Diligence Guidance for Responsible Business Conduct* (OECD, 2018) framework ("OECD framework"). Regarding policies, Boeing implements a [Boeing Employee Code of Conduct](#), [Code of Basic Working Conditions and Human Rights](#), and [Boeing Supplier Code of Conduct](#). Regarding management systems, Boeing implements a holistic approach that includes an annual human rights compliance controls review under [Boeing's Compliance Risk Management process](#), a means to report concerns via [the Boeing Ethics Line](#), embeds requirements in supplier contracts, and participates in the International Aerospace Environmental Group's (IAEG) [program](#) for aerospace and defence industry sustainability assessment. To identify, assess and manage risk, Boeing pursues supply chain transparency including through risk-based mapping of procurement categories and supplier locations, monitoring for supplier related concerns, prioritizing suppliers for sustainability assessments, and providing voluntary modern slavery awareness training to employees. Supplier sustainability assessment scores, specifically human rights aspects, are currently reviewed for industry level trends via IAEG. Finally, if a situation requiring remediation arises, Boeing would implement a remediation process tailored to the substantiated allegation.

4. POLICIES & DUE DILIGENCE PROCESSES IN RELATION TO FORCED & CHILD LABOUR

Given Boeing's policies and management practices designed to prevent forced and child labour in its operations, and in accordance with the *OECD* framework, due diligence is focused on the supply chain as explained in the figure below.

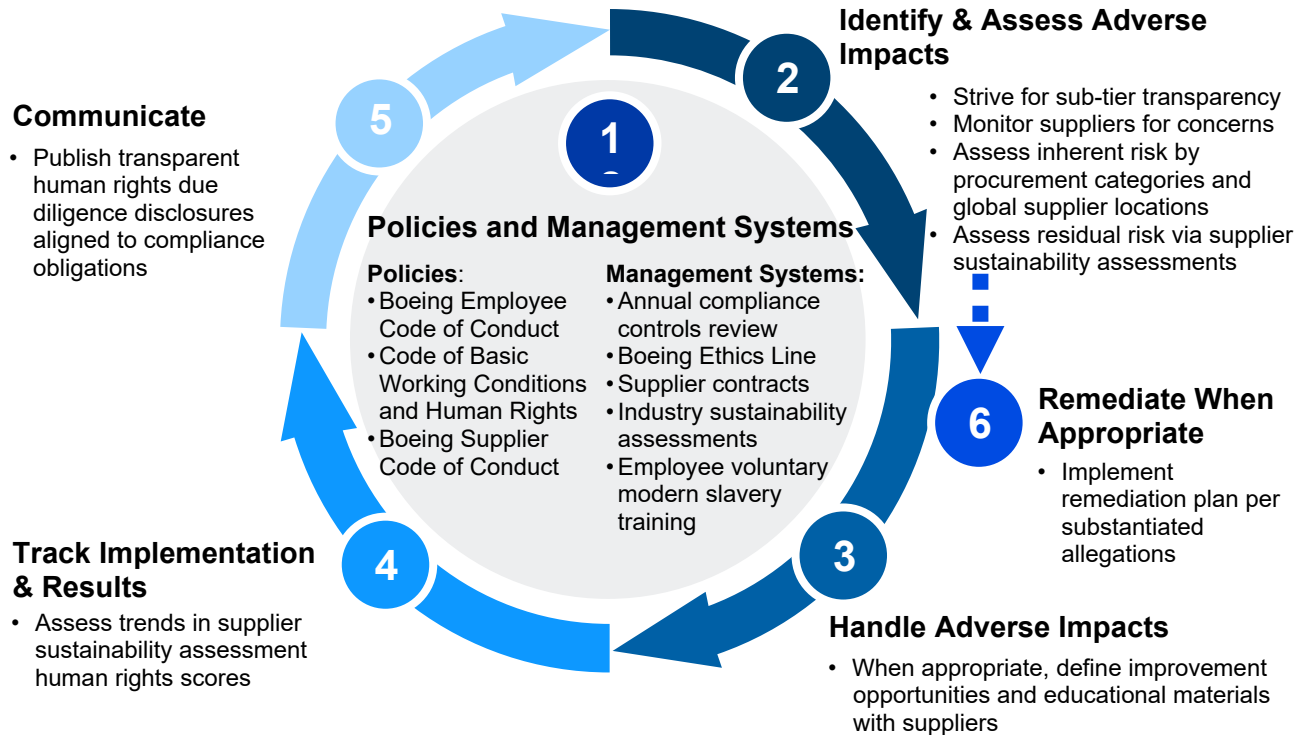


Figure 1: Boeing's due diligence framework aligned to OECD model

Policies and Management Systems: Policies include [Boeing Employee Code of Conduct](#), [Code of Basic Working Conditions and Human Rights](#), and [Boeing Supplier Code of Conduct](#). Management system aspects include annual human rights compliance controls review, [Boeing Ethics Line](#) to report concerns, requirements in supplier contracts, participation in an aerospace and defence industry program for sustainability assessment and employee voluntary modern slavery awareness training to heighten understanding.

Identify & Assess Adverse Impacts: Strive for supply chain sub-tier supplier transparency; Monitor suppliers for concerns; Assess inherent risk based on procurement categories and global supplier locations; Conduct supplier sustainability assessments to assess residual risk.

Handle Adverse Impacts: When appropriate, define improvement opportunities and educational resources with suppliers.

Track Implementation & Results: Assess trends in supplier sustainability assessment human rights scores.

Communicate: Publish transparent human rights due diligence disclosures aligned to compliance obligations.



Remediate When Appropriate: When necessary, implement our remediation process tailored to the substantiated allegation.

5. FORCED & CHILD LABOUR RISKS

BCOL operates in a sophisticated aerospace industry with a highly skilled workforce. No business can certify it is free of forced and child labour. BCOL considers the risk of direct or indirect links to forced and child labour in its operations and supply chains to be “Low” given its compliant hiring practices and that its suppliers are predominately located in the United States and Canada (>99% of spend) which have a low occurrence of modern slavery per Walk Free’s [2023 Global Slavery Index](#).

Consistent with the *OECD* framework, Boeing is making efforts to expand its capabilities across the enterprise to identify, assess and handle adverse impacts through supply chain mapping, supplier monitoring, assessing inherent risk by procurement categories and supplier locations, conducting supplier sustainability assessments, and when appropriate, identifying supplier improvement opportunities supplemented with educational materials.

6. REMEDIATION MEASURES

BCOL has not identified any forced labour or child labour in its activities and supply chains, and subsequently has not activated the remediation process.

7. REMEDIATION of LOSS of INCOME

Given BCOL has not identified any forced labour or child labour in its activities and supply chains, and consequently has not activated the remediation process, there has been no loss of income to vulnerable families resulting from remediation measures.

8. TRAINING

Boeing internally developed enterprise modern slavery training that is available to BCOL employees. Training is optional, but highly encouraged for employees in supplier facing roles to heighten topic awareness, enable spotting signs of potential forced and child labour, and ensure clarity on how to report concerns to the [Boeing Ethics Line](#). In addition, Boeing’s annual Code of Conduct campaign and related training reinforces the company’s expectation of a respectful workplace where employees comply with all applicable laws, promptly report any ethical concerns, and understand that retaliation against anyone who speaks up to report a concern is not tolerated.

By participating in the IAEG’s [program](#) for aerospace and defence industry sustainability assessment, employees and assessed suppliers have access to educational materials



that address developing policies, reporting frameworks, prevention, risk identification, and remediation. The industry association also reviews sustainability assessment results across a shared data pool to inform supply base stewardship efforts.

9. ASSESSING EFFECTIVENESS

BCOL participates in Boeing's holistic management system approach to assess and govern forced labour and child labour risk management practices. Oversight occurs via an annual human rights compliance controls review under [Boeing's Compliance Risk Management process](#) which includes review of policies, procedures and key performance indicators (KPIs) across the enterprise. Core KPIs used to assess effectiveness include supplier code of conduct acknowledgement coverage, supplier human rights allegations submitted to the [Boeing Ethics Line](#) or identified via monitoring, supplier contracts with human rights requirements, prioritized suppliers with completed sustainability assessments, supplier sustainability assessment results / trends, and any substantiated supplier human rights violations.

In addition, by participating in the IAEG's [program](#) for aerospace and defence industry sustainability assessment, we have an opportunity to collectively review an industry pool of sustainability assessment results for data driven insights on the effectiveness of human rights risk management practices. This also affords comparing the maturity of Boeing's supply chain human rights risk management practices to an industry benchmark.

10. APPROVAL & ATTESTATION

Pursuant to subparagraph 11(4)(a) of the Act, this modern slavery statement was approved by the Interim President of Boeing Canada Operations Limited.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities 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 above.

I have the authority to bind Boeing Canada Operations Limited.

DocuSigned by:

A handwritten signature in black ink, appearing to read "Pierre Ruel", enclosed within a blue DocuSign signature box.

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Full name: Pierre Ruel

Title: Interim President, Boeing Canada Operations Limited

Date: 22 May, 2024



The Board of Directors of BCOL has approved the Modern Slavery Statement 2023 on behalf of BCOL in accordance with the requirements of the Fighting Against Forced Labour and Child Labour in Supply Chains Act.