



# BOEING AUSTRALIA: MODERN SLAVERY STATEMENT 2021



This statement is made on behalf of Boeing Australia Holdings and its wholly owned subsidiaries: Boeing Aerostructures Australia Pty Ltd, Boeing Defence Australia Ltd, Boeing Distribution Services Pty Ltd, Insitu Pacific Pty Ltd, and Jeppesen Australia Pty Ltd (collectively, 'Boeing Australia' or 'we'). This statement sets out the steps that Boeing Australia entities have taken to address risks of modern slavery within our business operations and supply chains. The statement is made pursuant to sections 13 and 16 of the Modern Slavery Act ('the Act') with respect to the financial year ending 30 November 2021 which aligns with the financial year of our parent company.

## INTRODUCTION

Boeing Australia views human dignity, freedom of movement, and freedom from oppression as fundamental rights in a principled work environment, and essential to the integrity of Boeing's corporate values.

Boeing Australia does not tolerate any form of modern slavery, which may include servitude, forced labour, exploitation, trafficking in persons, debt bondage, deceptive recruiting for labour or services, or any other slavery-like practices. We expect the same of our partners and suppliers in our global supply chain.

## OUR BUSINESS

### Our Structure

Boeing Australia Holdings ('BAH') (ACN: 101 168 932) is a subsidiary of The Boeing Company, a multinational corporation headquartered in the United States, and is the parent company of several Boeing wholly owned subsidiaries in Australia. Boeing Australia Holdings' subsidiaries within the scope of this Modern Slavery Statement are:

- » Boeing Defence Australia (ACN: 006 678 119)
- » Boeing Aerostructures Australia (ACN: 103 165 466)
- » Boeing Distribution Services (formerly Aviall) (ACN: 006 224 764)
- » Insitu Pacific (ACN: 122 991 333)
- » Jeppesen Australia (ACN: 010 573 814)

Additional information on Boeing Australia and its structure is available at <https://www.boeing.com.au/>

The BAH Board of Directors endorse the consolidated Modern Slavery Statement on behalf of all Boeing Australia entities, noting that only Boeing Defence Australia ('BDA') and Boeing Aerostructures Australia ('BAA') meet the reporting entity threshold under the Modern Slavery Act. Voluntary reporting on behalf of entities that do not meet the threshold under the Act aligns with Boeing Australia's nationwide anti-modern slavery policy framework, and demonstrates our commitment to addressing modern slavery risks within our Australian operations and supply chain. As the largest entities with the most complex and extensive supply chains, resulting in the greatest influence on Boeing Australia's compliance under the Act, this report primarily reflects BDA and BAA operations.

## Our Journey

Boeing Australia is committed to implementing appropriate mechanisms to address modern slavery risk consistent with the intent of the Act. As our business processes mature, we seek to build on our governance frameworks and the mechanisms through which we identify and assess the potential risk of modern slavery in our operations and supply chain. Boeing Australia is committed to continuous improvement and the ongoing assessment of our actions taken in relation to modern slavery risk, and their effectiveness.

### FOUNDATION

- » Increase organisational awareness of modern slavery risk
- » Embed Australian Modern Slavery Act Policy
- » Enhanced Governance, Risk and Compliance ('GRC') approach to Boeing Australia Operations and introduction of Senior Manager, GRC to Business Strategy Function

- » Initial assessment of Tier 1 supply chain
- » Implement specific modern slavery clauses in Boeing Australia supplier contracts
- » Provide training on modern slavery to Boeing Australia employees and contractors
- » Expansion of GRC team within Business Strategy Function



WE ARE HERE

### FUTURE STATEMENTS

- » Improve and increase supply chain assessment activities
- » Perform gap analysis and develop improvement plan
- » Develop strategies to address risk within Tier 1 supply chain
- » Implement gap closure plan
- » Focus on continuous improvement opportunities

## Our Flight Plan

Our flight plan represents the values and guiding principles that underpin Boeing Australia operations. We are honoured to serve the people that rely on our products and services every day, which is why we hold ourselves to the highest standards in our work, how we do it, and how we treat one another.

### OUR VALUES

#### HOW WE OPERATE

- » Start with engineering excellence
- » Be accountable – from beginning to end
- » Apply Lean principles
- » Eliminate traveled work
- » Reward predictability and stability – everywhere in our business

#### HOW WE ACT

- » Lead on safety, quality, integrity and sustainability
- » Foster a Just Culture grounded in humility, inclusion and transparency
- » Import best leadership practices
- » Earn stakeholder trust and preference
- » Respect one another and advance a global, diverse team

Our values are central to our identity. By instilling these behaviours within our team, Boeing Australia commits to creating a culture that fosters accountability, quality and the highest of ethical standards to enable us to deliver:



Trusted Customer and Supplier Relationships



Safe, happy people



Diverse and inclusive teams that listen and learn



Risk-based governance frameworks



Leading sustainable business practices



Targeted collaboration with Australian Industry

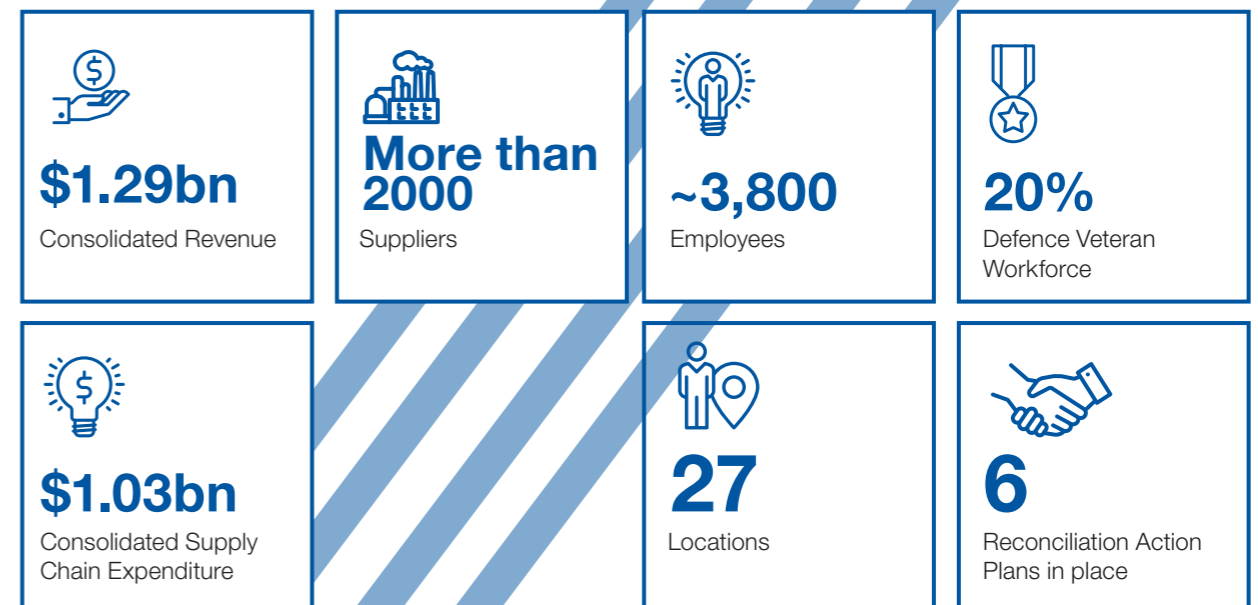


Execution on our commitments

## Our Operations

Boeing Australia represents The Boeing Company's largest operational footprint outside the United States and the broadest portfolio of products and services in the Australian aerospace industry. With approximately 4000 employees and a heritage stretching back more than 95 years, Boeing Australia plays an integral role in the Asia Pacific region's aerospace and defence industry. Boeing Australia is a leader in advanced manufacturing for commercial airplane components, defence systems and sustainment, training services, research and development, and autonomous systems.

### Operations Snapshot



As part of the world's largest aerospace company, Boeing Australia entities sell, manufacture and maintain a broad portfolio of products and services for Australian aviation and defence customers. These activities are primarily divided across the two (2) key reporting entities:

### Boeing Aerostructures Australia

BAA operates in the commercial aerospace industry, and is Boeing's primary manufacturing organisation in Australia. The BAA product offering includes the manufacturing and maintenance of airplane components for passenger aircraft.

### Boeing Defence Australia

BDA is one of the largest defence prime contractors in Australia, and provides best-for-capability defence solutions in the markets of networks and communications, mission systems, and sustainment and training. In partnership with the Australian Defence Force and the Commonwealth of Australia, BDA provides aircraft maintenance and upgrades, component maintenance solutions, technical support, mission-critical infrastructure and training on some of the most capable surveillance, command, control, and combat platforms in the world. BDA is an industry leader in the design, development and sustainment of integrated tactical and strategic mission systems and battlespace communications.

In addition, Boeing Australia has a significant research and development team which partners with universities around Australia, the Commonwealth Scientific and Industrial Research Organisation ('CSIRO'), the Defence Science and Technology Group ('DSTG'), and others, to develop and deliver cutting-edge technologies to advance Australian and global aerospace industries.

### Our Locations

Boeing Australia is headquartered at and registered to Level 10, 10 Bridge Street, Sydney NSW 2000. With employees in every state and territory (excluding Tasmania), our major operating locations include:

- » Brisbane, where our Boeing Defence Australia and Insitu Pacific subsidiaries are headquartered;
- » Melbourne, where our Boeing Aerostructures Australia and BDAPL facilities reside;
- » Sydney, home to Boeing Australia headquarters; and
- » Australian Defence Force bases throughout the country.



### Our People

Boeing Australia strives to create a positive work environment where engaged teams adopt and display the company values in all of their activities, and address the risk of any slavery-like practices within our operations.

Boeing Australia has implemented key policies in support of meeting our obligations under the Modern Slavery Act, especially as it relates to our people and our operations.

### Australian Modern Slavery Act Policy

Our anti-modern slavery policy was implemented in early 2020, and outlines how Boeing Australia complies with the Act. It does so by establishing:

- » Modern Slavery Compliance Committee;
- » Modern Slavery Compliance Officer;
- » Annual Public Compliance Statement requirements;
- » Consultation requirements for Public Compliance Statement development;
- » Modern Slavery training cadence; and
- » Supply Chain Due Diligence minimum requirements.

All workers are bound by this policy when working for, or acting on behalf of Boeing Australia.

### Code of Conduct

As a condition of employment, all Boeing Australia employees agree to be bound by The Boeing Company Code of Conduct recommitment training which is conducted annually. Under the Code, employees acknowledge their obligation to conduct business fairly, impartially and in an ethical and proper manner, and in compliance with all applicable laws and regulations. As a core principle, employees acknowledge that integrity must underlie all company relationships, including those with customers, suppliers, communities and among employees.

Boeing Australia understands that observing the highest ethical business standards is not only the right thing to do, but is fundamental to our ethos and long-term success as a company and links to our values.

### Whistleblower Policy

Boeing Australia is committed to providing a "just culture" environment, where individuals are safe to raise concerns, risks or issues free from risk of reprisal. In alignment with our commitment to ethical business conduct, Boeing Australia has implemented a Whistleblower policy to ensure appropriate protections are afforded to any persons raising concerns related to Boeing practices that they believe may be illegal or improper. Our Whistleblower policy extends to all Boeing Australia contractors and employees, as well as any other persons affected by Boeing operations as described in the relevant legislation.

### Recruitment

Boeing Australia notes that recruitment methodology can create modern slavery risk, and therefore there are robust principles in place to guide recruitment and selection practices at Boeing Australia. These include:

- » Recruitment and selection being undertaken within the context of achieving a diverse workforce profile capable of achieving the strategic goals and priorities of the enterprise.
- » Ensuring that the most capable person is selected for a position on the basis of merit and without regard to irrelevant factors such as a person's gender status, sexual preference, race, colour, ethnic background, descent, marital status, disability, or age.
- » To ensure consistent selection including standardized interview structure, with a gender mix on the hiring panel and where possible, with panel members have completed anti-discrimination and/or unconscious bias training.
- » Robust reference checks and pre-employment checks being completed on each person in line with aerospace and defence practices.

### Diversity and Inclusion

Boeing Australia respects and values the diversity of its workplace, and the right for all people to be treated equally and fairly. We are committed to providing a work environment free from discrimination, harassment, victimisation and vilification for all persons, and maintains a Zero Tolerance policy to any such behaviour. Our Diversity, Harassment & Equity policy ensures all employees and contractors are afforded protection from all forms of direct and/or indirect discrimination, and sets out the mechanisms for investigation, management and resolution of complaints, including relevant disciplinary pathways.

In addition, The Boeing Network has a number of established Business Resource Groups that maintain a goal of effecting organisational change and providing guidance on strategies to prevent or overcome systemic or historical discrimination to foster an inclusive and diverse workplace. Business Resource Groups are voluntary and employee-driven, centered on particular experiences or traits such as ethnicity, race, gender identity, sexual orientation, disability or veteran status. Each group is led by an Executive champion, who helps each group succeed.

**Each group is open to everyone, whatever their background or identity, and are based on four common pillars:**



**COMMUNITY ENGAGEMENT**



**PROFESSIONAL DEVELOPMENT**



**BUSINESS ALIGNMENT**



**TALENT ENGAGEMENT**

Of particular note in Australia are the Gender Working Group, Reconciliation Action Plan Working Group, Boeing Women in Leadership Asia Pacific Chapter, Boeing Veterans Working Group, and the Boeing Employee Pride Alliance.



**16**

Australian University STEM/R&D Partners



**>\$75M**

Boeing Australia R&D Investment

## Dignity and Respect at Work

Boeing Australia supports a positive workplace culture with a focus on preventing sexual harassment and discrimination. There is a proactive approach with a commitment to zero tolerance and where a culture to foster equity and respect is fundamental to the way we do business.

The Boeing Australia Dignity and Respect at Work program includes multiple activities, including:

- » A single Diversity and Inclusion policy for all Boeing Australia entities
- » An improved framework for employees to raise concerns within that allows a more human centric approach
- » Leaders Guide and training across the business on how to create respectful workplaces
- » Centralised point for easy access and support
- » Upskilling of resources to ensure appropriate support to employees who raise issues

## Sustainability

As part of our commitment to improved practices related to Environment, Governance and Sustainability ('ESG'), The Boeing Company released its inaugural Sustainability Report on behalf of all subsidiaries in 2021. In this report, we outlined our commitment to continuously improve our processes to minimise the negative impacts of our business operations on the global environment.

Boeing Australia is committed to protecting, connecting and exploring our world and beyond – safely and sustainably. Sustainability is rooted in our values and our stakeholders' expectations, and includes our focus on environmental stewardship, social progress and inclusion, and values-based and transparent governance.

To learn more about The Boeing Company sustainability journey or to access the 2021 Sustainability Report, please visit <https://www.boeing.com/principles/sustainability/annual-report/index.page>

## Our Supply Chain

Boeing Australia maintains a robust supplier base in Australia and around the world. The majority of our direct (Tier 1) suppliers are Australian companies. Our remaining Tier 1 suppliers are located within Boeing's global supply network and are predominately based in North America and Western Europe, with a limited number of suppliers based in Asia and southern Africa.

Suppliers to Boeing Australia are engaged through various types of arrangements, including one-off purchases under standard purchase order conditions, through to large-value strategic partnerships for defence acquisition and sustainment, governed by master service agreements and defined statements of work.

Each Boeing Australia subsidiary has their own embedded Supply Chain Management ('SCM') function responsible for the sourcing of goods and services. SCM functions within each subsidiary manage the end-to-end procurement lifecycle with support from subject matter experts within business units to ensure procured goods and services are consistent with the business specifications and requirements.

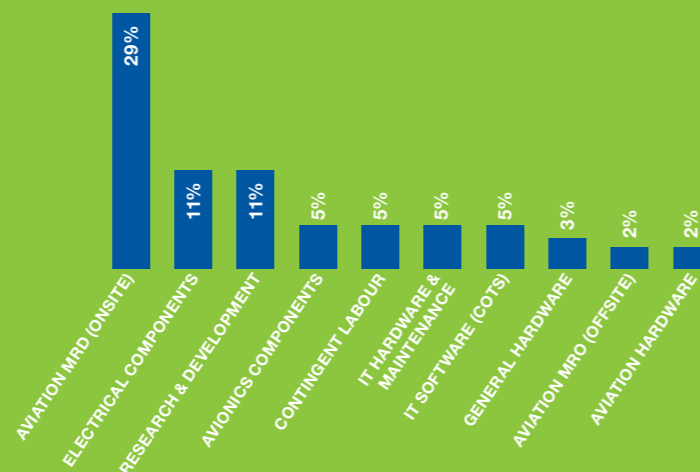
Boeing Australia's supply chains are varied, and are spread across a broad range of spend categories by the nature of our specialisation and product offerings in the commercial aerospace and defence sectors.

During the 2021 reporting period, more than 2,000 direct suppliers were engaged by Boeing Australia to supply goods and services across 70 spend categories, to a total value of AU\$1.03bn.

For the primary reporting entities of BAA and BDA, Australian suppliers represented 64% of the total supply chain spend.

The top 10 categories, making up 78% of our total spend, are outlined below:

### Top Categories by % of Total Spend



## MODERN SLAVERY RISK

Boeing Australia seeks to engage suppliers of high-quality goods and services, and is committed to ethical supply chain management practices. This includes eliminating practices that give rise to the likelihood of modern slavery risk, such as requiring that suppliers meet unrealistic cost targets or delivery timeframes, or seeking to negotiate contracts for the cheapest possible labour or goods and services.

Creating a transparent and enhanced domestic supply chain is a key component in Boeing Australia's procurement strategy. It is an ongoing requirement to increase the capability and capacity of our onshore suppliers to enable resilience and economic benefits to be maintained within Australia. BDA has in place a dedicated Australian Industry Capability ('AIC') team that focuses on partnering with industry to drive these outcomes, and has been effective in increasing the local spend. Some specific statistics relevant to AIC delivery upon these objectives for FY21 are:

- » \$232M spent within the domestic supply chain
- » \$67.5M spent specifically with Small and Medium Enterprises
- » \$6.6M spent with certified Indigenous Suppliers

Boeing Australia acknowledges that there are many forms of modern slavery, and that the relative risk can be influenced by a number of factors, including industry sector, product type, location and the nature of labour associated with producing the goods. These key areas of potential risk, and the methods and governance in which Boeing Australia engages, assesses, addresses and monitors them are outlined below.

### Supply Chain Risk Considerations

Factors considered in determining the modern slavery risk in Boeing Australia's supply chain include:

#### Industry / Sector

Specific industries such as manufacture of general goods, supply of IT hardware, offshore business process outsourcing ('BPO') and construction have been deemed as high risk for modern slavery by the Walk Free Global Slavery Index ('GSI'). As outlined within the SAI Global Modern Slavery White Paper (2016), other areas of risk that are monitored by Boeing Australia include minerals, textiles, and shipping / transportation.

#### Product Type

International guidance materials, including the GSI and US Department of Labor List of Goods Produced by Child and Forced Labour, are considered in assessing modern slavery risk on a product basis. Specific goods and commodities have been identified as high risk due to the nature of their production (dirty, dull or dangerous work), practices associated with the sourcing of relevant raw materials, and countries of origin.

## Location

Although the significant footprint of Australian suppliers within Boeing Australia's supply chain does materially reduce the risk of modern slavery within our first-tier supply chain, we acknowledge that risks may exist in the second-tier of our supply chain, including if first-tier suppliers are sourcing products from countries other than their headquarters. The GSI provides a ranking of the number of people living and working in conditions that constitute modern slavery, as well as an analysis on actions of governments to respond. Additionally, the GSI provides an overview of other factors that may increase vulnerability of individual groups, and in-part forms the basis for Boeing Australia's self-assessment of risk.

## Workforce

In undertaking supplier assessments, Boeing Australia entities consider the nature of labour involved in the production of goods and services. This is particularly relevant to goods or services that have been assessed as high risk for child, low-skilled, vulnerable or migrant labour, on the basis of knowledge derived from the above sources.

## OPERATIONAL MODERN SLAVERY RISK

Our assessment is that there is very low to negligible risk that Boeing Australia may identify modern slavery related to employment practices in our business operations. Boeing Australia complies with all industrial relations instruments, employment laws and equal employment opportunity regulations.

Additionally, we consider a low risk of modern slavery within Boeing Australia's indirect workforce, whether through contingent labour hire agreements or outsourcing of unskilled labour as part of facilities management agreements. To address this risk, Boeing Australia has implemented a suite of standard contract positions for labour contracts, specifically addressing safety, employment conditions and compliance with relevant legislation. Our standard form contracts also reference the Boeing Australia Supplier Code of Conduct, which outlines our expectations for fair, impartial and ethical business conduct by suppliers in the delivery of goods and services to Boeing Australia. At the time of drafting this modern slavery statement, Boeing Australia is in a phase of transition to an enterprise-wide Supplier Code of Conduct, applicable to all subsidiaries of the The Boeing Company globally. We look forward to providing an update regarding the adoption and implementation of this revised Code of Conduct in our 2022 statement.

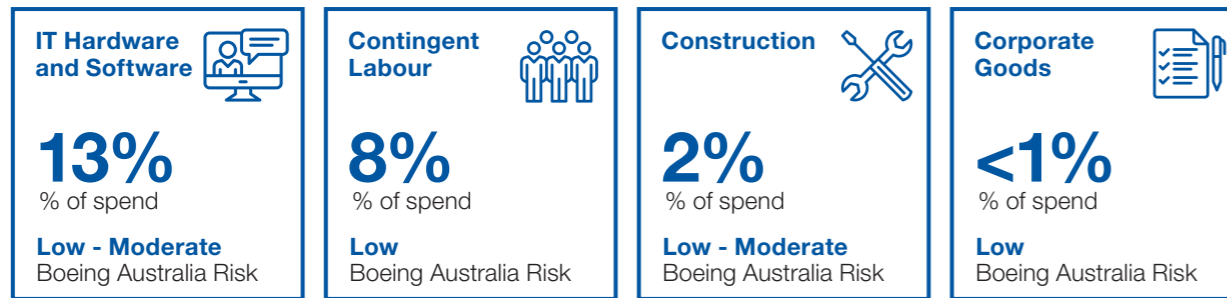
Boeing Australia has also introduced a mandatory modern slavery clause in all supplier agreements requiring first-tier suppliers to warrant that they will identify, address and notify Boeing Australia of any potential or actual modern slavery practices identified within their own supply chains.

## SUPPLY CHAIN MODERN SLAVERY RISK

Based on the limited global geographic disbursement of key suppliers, Boeing Australia has self-assessed the risk of modern slavery within the first-tier supply chain as low. Further, the extent of regulatory oversight of Boeing Australia and the aerospace industry significantly reduces the risk of modern slavery. This is especially relevant as certification to international standards is a minimum prerequisite for eligible supply of aviation goods and services.

Boeing Australia acknowledges that the risk of modern slavery being identified is more likely to be found in lower tiers of our supply chain and commits to continuously working with first-tier suppliers to increase transparency regarding origin of goods supplied, and to identify and remediate any potential risks identified in the lower tiers of our supply chain.

There is low to moderate risk that Boeing Australia may identify modern slavery through procurement of goods and services by suppliers who support our operations. Based on open-source guidance available through GSI, the FRDM third party due diligence tool, and findings published within the SAI Global Modern Slavery White Paper (2016), Boeing Australia has assessed that IT hardware and services, contingent labour, corporate goods and construction services are likely to represent the highest risk categories within our current supply chain. To address this risk, Boeing Australia has embedded policies and procedures requiring oversight support from Security, Legal, Quality and Environment, Health and Safety ('EHS') functions in sourcing, evaluating and contracting with suppliers of high-risk goods and services. In addition, BDA and BAA have embedded Category Management roles to oversee high risk categories including IT, Facilities (including Construction) and Corporate Goods and Services (including PPE & textiles) to ensure consistency and stewardship in modern slavery risk management.



A more detailed assessment of the nature of the identified risk areas is included in the table below.

Category	Example	Potential form of Modern Slavery Risk
<b>IT Hardware and Software</b>	<ul style="list-style-type: none"> <li>» IT hardware</li> <li>» Electrical goods and wiring</li> <li>» IT offshore support</li> </ul>	<ul style="list-style-type: none"> <li>» Forced Labour</li> <li>» Bonded Labour</li> <li>» Child Labour</li> <li>» Exploitation of Migrant Workforce</li> </ul>
<b>Contingent Labour</b>	<ul style="list-style-type: none"> <li>» Contractors Contingent Labour</li> <li>» Facilities Management (Cleaning)</li> </ul>	<ul style="list-style-type: none"> <li>» Excessive overtime</li> <li>» Bonded Labour</li> <li>» Exploitation of Migrant Workforce</li> </ul>
<b>Construction</b>	<ul style="list-style-type: none"> <li>» Construction and fit-out of facilities</li> </ul>	<ul style="list-style-type: none"> <li>» Excessive overtime</li> <li>» Bonded Labour</li> <li>» Exploitation of Migrant Workforce</li> </ul>
<b>Corporate Goods</b>	<ul style="list-style-type: none"> <li>» Apparel – uniforms, PPE</li> <li>» General Merchandise – Branded promotional goods, e.g. water bottles, lanyards, branded</li> </ul>	<ul style="list-style-type: none"> <li>» Excessive Overtime</li> <li>» Forced Labour</li> <li>» Bonded Labour</li> <li>» Child Labour</li> <li>» Exploitation of Migrant Workforce</li> </ul>

## OUR ACTIONS

### Due diligence

In accordance with the United Nations Guiding Principles on Business and Human Rights, Boeing Australia conducts ongoing supplier due diligence to identify risks of modern slavery within our supply chain by conducting annual risk assessments and reviewing the locations of our suppliers against the most vulnerable countries and industries as listed on the GSI.

Boeing Australia annually evaluates and reports on modern slavery risk, as part of The Boeing Company's enterprise-wide compliance risk assessment process. Enhancements to the compliance program implemented in 2021 allow Boeing Australia to aggregate risk assessments conducted by Australian subsidiaries to enable more effective identification of modern slavery risk in the ensuing reporting period, and enabling a coordinated approach to risk remediation.

In addition to our previously referenced suite of policies and procedures, some of the enablers of our due diligence activities are outlined below.

### Enterprise tools

Through The Boeing Company, Boeing Australia has access to third party due diligence tools for the assessment of various supply chain risks. As part of the supplier approval process, critical suppliers are on-boarded to the Dun and Bradstreet persistent screening tool for supplier financial risk monitoring and early risk identification. Further, Boeing Australia perform annual assessment of first-tier suppliers through the FRDM software tool. FRDM assesses suppliers based on their location, industry, and any historical issues pertaining to business and human rights and provides 'high risk' alerts to Boeing Australia when a supplier is identified as potentially or actually engaging in modern slavery practices.

In the event that a due diligence activity identifies a high-risk supplier, our Modern Slavery Compliance Officer would be notified and would investigate the concern in partnership with the relevant contract or supply chain management focal to address the modern slavery risk with the supplier.

During the 2021 reporting period, none of our first-tier suppliers were identified as high risk.

### Supplier agreement to raise modern slavery risks

Boeing Australia recently revised its standard supplier contracts and introduced a specific modern slavery compliance clause which mandates a number of measures that suppliers must take to identify and address modern slavery risks within their own business operations and supply chains. While specific terms may slightly differ between Boeing Australia supplier contracts due to the varied nature of our business operations, the modern slavery clause, for the most part, requires suppliers to warrant that they:

1. do not engage in modern slavery;
2. will not use or procure any services, materials, goods, plant or equipment they know or ought to reasonably know are the product of modern slavery;
3. have not been charged with or convicted of any modern slavery offence in any jurisdiction;
4. having made reasonable enquiries, and to the best of their knowledge, have not been the subject of any investigation, inquiry or enforcement proceedings relating to modern slavery;

In addition, the clause requires suppliers to agree that they will take reasonable steps to identify modern slavery risks in their business operations and supply chains, and ensure that their workforce and supply chains are not engaged in modern slavery practices, including by implementing appropriate policies, due diligence and remediation procedures in order to achieve compliance with the modern slavery supplier clause. In the event that a supplier subject to the modern slavery clause becomes aware of any modern slavery risk or practice in its business operations or supply chains, it must notify Boeing Australia in writing as soon as practical, advise Boeing Australia of next steps it is taking or plans to take to address and remediate the modern slavery risk or practice, and provide Boeing Australia with all information reasonably necessary requested in connection with the modern slavery risk or practice.

### Governance, Risk and Compliance

Boeing Australia continues to strengthen its governance, risk and compliance functions across its entities to help identify, assess and manage risks relevant to our operations. This includes risks related to Supply Chain activities, covering compliance with the Act.

## OUR EFFECTIVENESS

2020 saw Boeing Australia introduce our Australian Modern Slavery Act Policy as an early priority in meeting the intent of the Act, and the submission of our first Modern Slavery Statement for the financial year ending 30 November 2020.

In that Statement, Boeing Australia made five (5) key commitments for implementation in the 2021 reporting period, and the following actions were successfully completed:

Commitment	Action
Continue to assess and monitor the risks in our supply chain using our established processes	Ensured Boeing Australia approach to supply chain assessment aligns to the Modern Slavery Act Policy. Reviewed and implemented improved Compliance Assurance Plan for 2021.
Implement a specific modern slavery clause in our supplier contracts, including mandating suppliers take steps to ensure against modern slavery risks within their own supply chain	Boeing Australia revised standard supplier contracts to include a specific modern slavery clause. The clause requires suppliers take steps to ensure against modern slavery risks within their own business operations and supply chains, and to notify Boeing Australia of any potential modern slavery risks that may arise. By requiring assessment, remediation and reporting of such risks, we are afforded additional oversight of the second tier of Boeing Australia supply chain.
Appoint compliance focal(s) to specifically assess our effectiveness in respect of modern slavery risk and supply chain due diligence	Boeing Australia has identified key personnel as compliance focals within the relevant entities, and introduce a centralised GRC function to assist business units to embed better practices with respect to risk identification and management, and oversee improvements related to compliance risk assessment findings.
Continue to provide modern slavery training awareness and implementation to identified functional groups including our contracts, procurement and supply chain management employees	Training on ethics, modern slavery and supply chain risk was delivered as mandatory training to ensure it is universally understood by an external audience.
Further align our due diligence globally with Boeing entities in Canada and Europe, in addition to our existing alignment with Boeing in the United States and United Kingdom	Boeing Australia contributed to The Boeing Company's updated enterprise-wide policy in 2021 to clearly align compliance with anti-human trafficking and anti-modern slavery requirements across the globe, including the Australian and United Kingdom anti-modern slavery legislation and the United States' Combatting Trafficking in Persons obligations. This policy provides a united approach to identifying and addressing risks of modern slavery across our global business operations and supply chains.

## OUR YEAR AHEAD

Boeing Australia has committed to the following priority actions for the reporting period 2022:

### In our Governance

- » To implement a more robust governance process to track our performance against commitments made within the Modern Slavery Statements.

### In our Operations

- » Perform a self-assessment for Modern Slavery risk in Boeing Australia's business operations.

### In our Supply Chain

- » Review our supply chain risk profile and methodology to explore the potential for integration of more comprehensive data sources.
- » Where identified, follow up on any high-risk suppliers to implement an action plan to remediate any identified risks.
- » Raise awareness of Modern Slavery risk within our supplier community and within Boeing Australia.

## OUR CONSULTATION

Boeing Australia's Modern Slavery Statement 2021 has been prepared with the support of key stakeholders from central functions and subsidiary entities, including Supply Chain Management; Government Affairs; Legal; Human Resources; Governance, Risk & Compliance; and operational business units. Additionally, this statement has been prepared through a process of consultation and approval by the directors of each voluntary reporting entity, and the Boeing Australia Board of Directors.



## Board approval

This Modern Slavery Statement 2021 was approved by the Board of Directors of Boeing Australia Holdings, its responsible governing body on 25 May 2022, in accordance with the requirements of the Modern Slavery Act 2018 (Cth).

**BRENDAN NELSON**  
CHAIR OF BOEING AUSTRALIA HOLDINGS AND PRESIDENT,  
BOEING AUSTRALIA, NEW ZEALAND AND SOUTH PACIFIC

**SCOTT CARPENDALE**  
DIRECTOR OF BOEING  
AUSTRALIA HOLDINGS

**PETER JOHNSON**  
DIRECTOR OF BOEING  
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**ANDREW DUGGAN**  
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