

PRO-4
Issue Date
June 5, 2008

Proper Marketing Practices

Purpose/Summary

This procedure provides guidance regarding proper marketing practices and sets forth the responsibilities of those engaged in the marketing of company products or services. This procedure applies to all employees of The Boeing Company, including subsidiaries, contingent labor, consultants and others acting for the company unless otherwise approved by the Senior Vice President, Business Development and Corporate Strategy.

Supersedes

April 20, 2006

Applies To

All Boeing

Maintained By

Senior Vice President, Business Development and Corporate Strategy

Authority Reference

Policy [POL-1](#), "Delegation of Authority to Authorize Business Transactions and Agreements, and to Commit Company Resources"
Policy [POL-2](#), "Ethical Business Conduct"

Approved By

Michael J. Cave
Senior Vice President, Business Development and Corporate Strategy

Summary of Changes to the Title Page

The Issue Date, Purpose/Summary, Supersedes date, Maintained By and Approved By have changed. There are no other changes.

1. Requirements

Proper marketing practices emphasize the quality, service, and competitive features of Boeing products and services. Marketing efforts focus on providing our customers accurate information so they can make informed decisions.

Marketing practices or activities that could harm The Boeing Company, its employees, its customers, or government agencies are prohibited regardless of the justification for such activities. Prohibited activities include the following:

- A. Using deceptive or misleading statements.
- B. Attempting to induce individuals to place their personal interests above those of the companies or organizations they represent.
- C. Attempting to restrict competition by
 - 1. Inducing a competitor or customer to breach a contract with a third party.
 - 2. Obtaining unauthorized access to classified or proprietary information or documents.
 - 3. Securing an unfair competitive advantage.
- D. Violating any law or regulation.
- E. Engaging in any activity that could damage the company's reputation.

Employees may only use legal, ethical, and proper methods to maintain markets for Boeing products and services and to secure additional business.

2. Responsibilities

- A. Employees who deal with customers or with government agencies must be familiar with this procedure and with any laws, regulations, or

customer-imposed rules that are applicable to the marketing of Boeing products and services.

1. Managers involved in marketing, sales, or customer relations, as well as program managers and managers responsible for performance of an awarded contract, are responsible for informing their employees of these requirements.
 2. Employees who deal personally with customer or government agency personnel must not be given company responsibilities that would place them in a position to violate customer- or agency-imposed rules or regulations regarding conflicts of interest.
 3. Employees who have assisted a Boeing customer within the last three years on the same or a directly-related procurement action are responsible for alerting their immediate supervisor to this fact and ensuring that their dealings with such customer are permissible. (Refer to [PRO-70](#))
 4. Employees who have assisted a Boeing competitor within the last three years on the same or a directly-related procurement action are responsible for ensuring that they abide by all obligations of confidentiality owed to the former employer, and abide by all laws and company policies governing the unauthorized possession and/or use of competition-sensitive proprietary documents or trade secrets of other companies. (Refer to [PRO-70](#) and [PRO-6375](#).)
 5. If an employee or consultant receives a document or information of any kind having a government or third-party proprietary marking which raises doubt as to the company's right to receive or use the information, or the nature or circumstances of receipt raise any doubt, that document or information must be immediately sealed and provided directly to an Ethics Advisor or the Law Department.
 6. Questions about this section should be directed to Contracts, an Ethics Advisor or the Law Department. (Refer to [PRO-70](#).)
- B. Employees cannot engage in any activity that would induce or appear to induce employees or representatives of a customer or government agency to place their personal interests above those of the firms or organizations they represent. Prohibited activities include the following:
1. Offering or providing money, loans, gifts, or other favors to influence directly or indirectly, business decisions or compromise the independent judgment of the employees or representatives of a customer or government agency. (See Boeing Procedure [PRO-6](#), "Offering of Business Courtesies")

2. Entering into various types of business relationships, such as joint ownership of property or personal financial relationships that might place or appear to place the employees or representatives of a customer or government agency in a conflict of interest with their employer or client.
 3. Offering or providing rebates or kickbacks to obtain information or business for the company. (See Boeing Procedure [PRO-9](#), "Proper Relationships With Suppliers.")
- C. Information on company products or services must be accurate and free of misleading or deceptive statements or intentional omissions of material facts.
1. All information or documents must be provided to our customers or government agencies openly without concealing the source.
 2. The company will only make commitments that it intends to keep.
- D. Conduct or activities that are prohibited under Boeing policy may not be accomplished through other parties. Employees may not request others to do anything that they are not permitted to do themselves under Boeing policy.
- E. Each operating group or division may issue guidelines, instructions, or procedures to assist employees in complying with this procedure.

3. References

[PRO-70](#), "Procurement Integrity and Restrictions on Proposal Team Assignments"

[PRO-6375](#), "Trade Secrets and Restrictions on Acquisition & Use of Third Party (Non-Boeing) Proprietary Information"