



BOEING EU WHISTLEBLOWER REFERENCE GUIDE

1. PURPOSE/SUMMARY

Boeing is committed to ensuring that covered individuals are able to report serious concerns under the European Whistleblower Directive (EU) 2019/1937 and its implementation across European Union (EU) Member States.

2. APPLIES TO

This reference guide applies to any legal entity (hereinafter referred to as "Boeing EU Company") that is directly or indirectly controlled by The Boeing Company and which falls within the scope of European Whistleblower Directive (EU) 2019/1937.

3. WHAT TYPE OF REPORTS ARE GOVERNED BY THIS REFERENCE GUIDE?

- 3.1** This reference guide governs reports that have been submitted through the reporting channels listed in Section 4.
- 3.2** Covered individuals (including employees, suppliers, customers, contractors, and business partners) may submit a report regarding the following: Suspected work-related violations of laws and regulations and directly applicable legal acts of the European Union (including, but not limited to, those listed in Article 2 of the EU Whistleblower Directive 2019/1937) by employees and business partners of any Boeing EU Company.
- 3.3** Suspected violations of laws and regulations and directly applicable legal acts of the European Union (including, but not limited to, those listed in Article 2 of the EU Whistleblower Directive 2019/1937) which might be attributable to any Boeing EU Company or any of its subsidiaries.
- 3.4** Any suspected threat or harm to public interest.
- 3.5** Work-related grievances do not qualify, unless they involve a breach of employment laws or regulations, or if they pertain to suspected retaliation for a report.

4. HOW CAN A REPORT BE SUBMITTED?

4.1. Online Reporting and 24/7 Ethics Line

Information how to access the web-portal and Ethics Line for confidential or anonymous reporting of concerns can be found on the following website: <https://www.boeing.com/sustainability/ethics-and-compliance#anchor2>

4.2. In-Person Meeting

Individuals may use the web-portal to request an in-person meeting or a video-call. In-person meetings will be scheduled within a reasonable time period from the time of the request but no later than required by the applicable laws.

4.3. Procedure

- 4.3.1.** An acknowledgment of the reported concern will be issued within seven days of receiving the report, provided that the reporting person's (hereinafter referred to as the "reportant") contact information is included.
- 4.3.2.** If a report is made over the phone, including via the Ethics Line, or in person, the conversation will not be recorded and the reportant will be offered the opportunity to review, correct and approve the minutes of the conversation.
- 4.3.3.** Duration: The investigation process will vary depending on the nature, extent and complexity of the reported matter. The reportant will receive the first feedback within three months (typically sooner) of the report submission.

5. OVERARCHING PRINCIPLES

- 5.1.** The investigation process is governed by strict confidentiality standards.
- 5.2.** Boeing will not tolerate any form of retaliation against individuals who:
 - 5.2.1.** Report a concern in good faith under this reference guide;
 - 5.2.2.** Assist someone in reporting a concern; or
 - 5.2.3.** Cooperate with an investigation in good faith and to the best of their knowledge.
- 5.3.** Individuals are encouraged to promptly report any instances of retaliation.
- 5.4.** Personnel involved in the review and investigation of a report will conduct any investigations in an impartial manner. If a conflict of interest arises in the person involved in the review and/or investigation appropriate steps will be taken to address and resolve such conflict of interest

6. DATA PRIVACY

Any processing of personal data under this Directive will be conducted in accordance with Regulation (EU) 2016/679, including the requirements of purpose limitation, data minimization and storage limitation. The Privacy Notice relevant to this reference guide is attached as Annex I.

7. RECORD MANAGEMENT

All records associated with the investigation process will be securely maintained, managed, and disposed of in accordance with applicable retention schedules and legal requirements, including but not limited to any record retention provisions outlined in the European Whistleblower Directive (EU) 2019/1937 as implemented by the individual EU Member States.

8. EXTERNAL REPORTING

Individuals covered by this reference guide are encouraged to use the company-provided reporting channels listed in Section 4 to submit their concerns. Where permitted by applicable laws and regulations, reportants may also choose to submit their reports directly to a competent public authority. A list of external reporting channels can be found in Annex II to this reference guide.

9. QUESTIONS

Questions related to this reference guide can be submitted through any of the reporting channels outlined in Section 4.

10. VERSION CONTROL

Version Number	Approved Date	Summary of Key Changes
1.0	January 29, 2026	

ANNEX I – Privacy Notice

Boeing Privacy and Cookie Statement: <https://www.boeing.com/privacy-and-cookie-policy>



ANNEX II – External Reporting Channels

In response to the European Whistleblower Directive (EU) 2019/1937, the EU member states have designated certain authorities to accept whistleblower reports. Below, a list is provided of such “external” reporting channels for selected countries.

Country	Authority	Link/Address
Denmark	Den Nationale Whistleblowerordning	https://whistleblower.dk/english
France	Public Procurement Contracts - French anticorruption agency (AFA), for breach of integrity - Directorate General for Consumer Affairs, Consumption and Fraud Prevention (DGCCRF), for anticompetitive practices	https://www.agence-francaise-anticorruption.gouv.fr/fr/faire-signalement-lagence-francaise-anticorruption https://www.economie.gouv.fr/dgccrf
	Financial Services, Products and Markets and Prevention of Money Laundering and Terrorist Financing - Financial Market Authority (AMF), for market investment and infrastructure service providers - Autorité de contrôle prudentiel et de résolution (ACPR), for credit institutions and insurance bodies	
	Product Safety and Compliance - Directorate General for Consumer Affairs, Consumption and Fraud Prevention (DGCCRF) - Service central des armes et explosifs (SCAE)	
	Transportation Safety - Directorate General for Civil Aviation (DGAC), for the safety of air transportation - Bureau d'enquêtes sur les accidents de transport terrestre (BEA-TT), for the safety of ground transportation (roads and rail) - Direction générale des affaires maritimes, de la pêche et de l'aquaculture (DGAMPA), for the safety of marine transportation	

France (cont.)	Protection of the Environment Inspection générale de l'environnement et du développement durable (IGEDD)	https://www.igedd.developpement-durable.gouv.fr/spip.php?page=contact
	Consumer Protection • Directorate General for Consumer Affairs, Consumption and Fraud Prevention (DGCCRF) • Protection of Privacy and Personal Data, Safety of Networks and Information Systems • Commission nationale de l'informatique et des libertés (CNIL) Agence nationale de la sécurité des systèmes d'information (ANSSI)	
	Violations Affecting the European Union's Financial Interests • French anticorruption agency (AFA), for breach of integrity • Public Finance Directorate General (DGFIP), for fraud to VAT Direction générale des douanes et droits indirects (DGDDI), for fraud to custom duties, anti-dumping duties and related duties	
	Internal Market-Related Violations • Directorate General for Consumer Affairs, Consumption and Fraud Prevention (DGCCRF), for anticompetitive practices • Competition Authority, for anticompetitive practices and State aids Public Finance Directorate General (DGFIP), for fraud to corporate tax	
	Activities Conducted by the Ministry of Defense • Contrôle général des armées (CGA) Collège des inspecteurs généraux des armées	
	Individual and Collective Labour Relations, Working Conditions Direction générale du travail (DGT)	
	Employment and Vocational Training Délégation générale à l'emploi et à la formation professionnelle (DGEFP)	
	Children's Best Interest and Rights Defender of Rights	
	Discriminations Defender of Rights	

Country	Authority	Link/Address
France (cont.)	Code of Conduct for Security Staff Defender of Rights	
Germany	Bundesamt für Justiz	https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html
Hungary	The Office of the Commissioner for Fundamental Rights	https://www.ajbh.hu/en/web/ajbh-en/how-can-you-complain-to-the-ombudsman-
Ireland	Office of the Protected Disclosures Commissioner	https://www.opdc.ie/en/
Italy	ANAC – Autorità Nazionale Anticorruzione	https://www.anticorruzione.it/-/whistleblowing
Netherlands	Huis voor Klokkenluiders	https://www.huisvoorklokkenluiders.nl/
Poland	Rzecznik Praw Obywatelskich (Commissioner for Human Rights)	https://bip.brpo.gov.pl/pl https://bip.brpo.gov.pl/en
Spain	Autoridad Independiente de Protección del Informante, A.A.I.	
Sweden	Various Gov't authorities, see link to the right for a comprehensive list	https://www.av.se/om-oss/visselblasarlagen/extern-rapporteringskanal/lista-over-myndigheter-med-ansvar-enligt-ansvarsomrade-enligt-forordning-2021949/