



The Boeing Company Advocacy Report



2024

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Why Boeing Advocates

In today's era of continuous change and advancement, Boeing remains in constant pursuit of the next horizon. We strive to make our world a safer, more connected place, and we're leading the charge to explore the farthest reaches beyond our planet. Our advocacy allows us to remain on the cutting edge as we engage in this work.

As a leading global aerospace company, Boeing develops, manufactures and services commercial airplanes, defense products and space systems for customers in more than 150 countries. As a top U.S. exporter, we leverage the talents of a global supplier base to advance economic opportunity, sustainability and community impact. Boeing's team is committed to innovating for the future, cultivating a culture based on the company's core values of safety, quality, integrity and sustainability.

Because policymakers' decisions directly and indirectly affect Boeing, we engage with key government officials to inform them about issues of importance to the company.

Priority areas include:

- A competitive economy that promotes research and development
- National security
- Global free trade
- Manufacturing
- STEM education
- Sustainable energy and the environment
- Space exploration
- Health care
- Retirement savings
- Tax policy

Building on our legacy of engineering excellence, Boeing strives every day to ensure that safety, quality, integrity and sustainability are at the heart of all we do as we take the aerospace industry to new heights. Our Government Operations professionals seek to ensure policymakers around the globe understand how the actions they take will impact Boeing and the communities we call home. Therefore, we collaborate with policymakers to ensure Boeing is able to execute at the highest levels.

Just as important as what we advocate for is how we conduct ourselves when we represent Boeing. The Government Operations team embraces transparency, integrity and civility. We believe in Boeing's mission, our people, and our products and services, and we strive to be the best possible ambassadors as we share Boeing's story with government officials to advance the company's goals.

Ziad Ojaki
Executive Vice President of Government Operations
The Boeing Company



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Boeing's Oversight and Compliance Procedures for Political Advocacy

Boeing's engagement in the political process is subject to an extensive framework of laws and regulations, company policies and procedures, and internal controls — all grounded in our [Boeing Code of Conduct](#) and informed by our values. This engagement is overseen by senior management of our Government Operations organization and, ultimately, the Governance & Public Policy (GPP) Committee of our board of directors (Board), as well as the full Board itself. Further, our compliance with these laws, regulations, policies, procedures and controls is enforced by a robust compliance program managed by our Law and Global Compliance function and overseen by the Board's Audit Committee, in consultation with the rest of the Board.

Our compliance program comprehensively addresses the company's public policy advocacy — including lobbying — and political contributions.

Board Oversight

Our Board exercises direct oversight with respect to Boeing's political advocacy activities, as dictated by our policies and procedures. Twice a year, the executive vice president (EVP) of Government Operations, an Executive Council member reporting to Boeing's CEO, briefs the Board's GPP Committee on the company's public policy advocacy activities. These reviews also include the company's work to further its policy priorities in the U.S. legislative and executive branches, the company's participation in the principal trade associations and think tanks to which it contributes, and the Boeing Political Action Committee's (BPAC's) budget and political contributions. These reviews include the compliance and oversight activities associated with each of these efforts. With respect to the principal trade associations, the GPP Committee reviews the company's position of influence within each group, and how each group's activities align with Boeing's business interests and values.

Annually, the full Board reviews the company's political advocacy engagements to ensure that the engagements further Boeing's strategy and reflect our values.

In addition, in between these formal reviews, members of the GPP Committee and other members of the Board consult on certain significant public policy relationships — including management's engagement with key government customers, trade associations and regulatory bodies — in order to further Boeing's strategy and ensure that such engagements reflect our values.

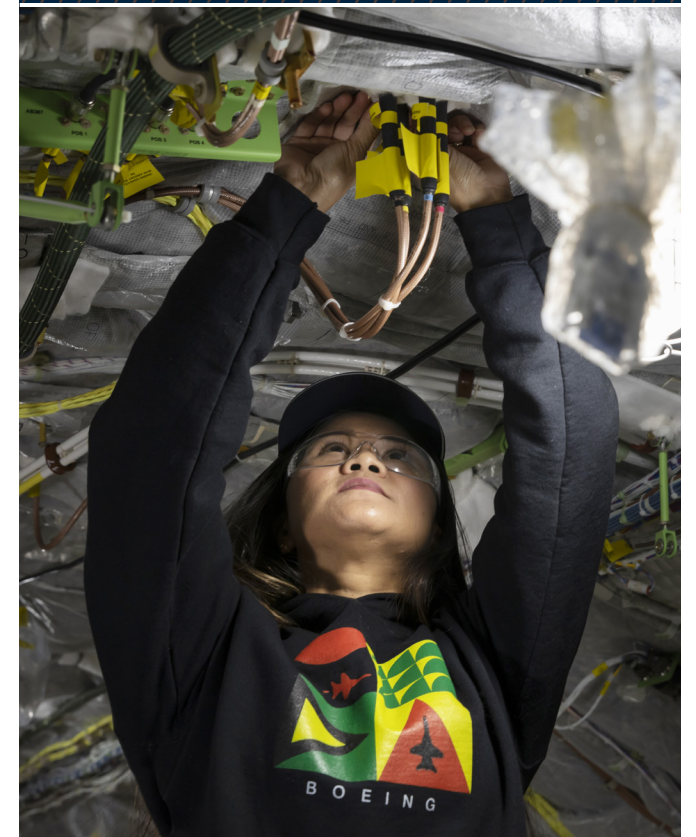
Compliance Procedures

Annually, Government Operations and Boeing's Law and Global Compliance function report to the company's Compliance Risk Management Board — led by our vice president and chief compliance officer and our senior vice president and controller, with oversight by our chief legal officer and EVP of Global Compliance — on the company's lobbying activities and political contributions and the effectiveness of our internal controls, including our policies and procedures. In the event of a particular risk or significant violations of these policies and procedures, those would be reported to the Audit Committee and full Board, as appropriate, as part of its regular reviews of the Compliance Risk Management Board's activities.

Lobbying

A vast array of federal, state and local laws governs corporate public policy engagements and regulates direct lobbying, grassroots advocacy and interactions with government officials.

Annually, the full Board reviews the company's political advocacy engagements to ensure that the engagements further Boeing's strategy and reflect our values.



Boeing's Oversight and Compliance Procedures for Political Advocacy

Based on this legal framework and our organizational values, we have a procedure that sets forth the requirements for our employees who engage in direct and indirect lobbying activities. The procedure also sets the standard for Boeing's memberships in trade associations and other groups that advocate on our behalf. Without first obtaining Government Operations' approval after review by Boeing's Law and Global Compliance function, no Boeing employee is permitted to:

- Engage in lobbying of government officials or have any contact with public policy institutes or embassies.
- Conduct grassroots activities to influence the general public.
- Make any corporate contribution to nonprofit organizations engaged in lobbying or political activities, including trade associations.

Additionally, policies and procedures require our employees who are registered lobbyists to file lobbying activity reports pursuant to the Lobbying Disclosure Act as well as applicable state and local laws. Annually, the company trains its lobbyists on applicable registration and disclosure requirements to ensure they accurately report lobbying costs and expenses. Government Operations instructs non-lobbyist employees who support lobbying contacts on proper compliance and timekeeping processes. In addition, Boeing's Law and Global Compliance function and Finance organization review and approve all lobbying disclosures to confirm they are accurate and complete. Government Operations' senior leadership must approve the retention of our outside government affairs consultants, after approval by Boeing's Law and Global Compliance function. Boeing must also review and approve our consultants' lobbying activity reports before they are filed.

Campaign-Related Activities

Boeing does not use any corporate dollars to support federal, state or local campaign activities. Federal, state and local laws limit the campaign activities and contributions of defense contractors, corporate PACs and our employees. In light of these restrictions, our policies and procedures set the requirements for:

- Visits to Boeing facilities by elected officials and candidates for elected office.
- All employees, restricting them from providing political contributions in anticipation of, to reward, or in return for an official act or seeking reimbursements for personal political contributions or expenses.
- Those employees who seek elected or appointed public office, or wish to serve on public advisory boards, commissions, or committees, which requires obtaining advance approval by Boeing's Law and Global Compliance function and Government Operations' senior leadership.

Additionally, our policies and procedures prohibit the use of corporate funds to:

- Contribute to committees that contribute to candidates and super PACs.
- Make electioneering communications or independent expenditures.

Our policies and procedures further prohibit trade associations and other organizations from using Boeing funds for any election-related political purpose.

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Boeing's Oversight and Compliance Procedures for Political Advocacy

PAC Contributions

BPAC operates under the direction and supervision of a 12-member Advisory Board, comprising a diverse group of senior Boeing leaders from across the company who report to the EVP of Government Operations, as described in Boeing's internal process instruction. The Government Operations vice president for Strategy & Advocacy and the vice president and assistant general counsel for Government Operations serve as its other officers. BPAC is funded solely from contributions of eligible employees and retirees in compliance with the Federal Election Campaign Act.

After an evaluation, BPAC contributes to candidates across the political spectrum, in a bipartisan manner, and at every level of government who:

- Demonstrate integrity, character and commitment to good government and the rule of law in their leadership.
- Share our values in defending freedom, democracy and our armed forces in their words and actions.
- Support our business and/or demonstrate leadership on aerospace-related issues.
- Support our policy priorities.
- Work to advance the interests of our customers, workforce, and the communities in which our employees live and work.

BPAC reviews the budget for all federal candidates on a semiannual basis under these criteria. It also relies on guidance from an outside consultant, which adds a layer of objectivity and scrutiny focused on candidates' integrity and ethics, commitment to diversity and inclusion, personal conduct, and affiliations to organizations that may not share our values. Government Operations' senior leaders meet on a biweekly basis with Boeing's Law and Global Compliance function to review contribution requests and approve BPAC contributions. For state and local political contributions, a similar review and oversight process occurs annually. Proposed state and local campaign contributions must be approved by Boeing's Law and Global Compliance function for pay-to-play and other compliance considerations.

All contributions are made on a nonpartisan basis without regard to the personal political preferences of individual employees, executives or Board members. BPAC files all required reports with the Federal Election Commission, IRS, states and localities where applicable. Under the supervision of Boeing's Law and Global Compliance function, BPAC regularly undergoes audits by an outside law firm and independent auditor. The EVP of Government Operations reviews BPAC's budget and political contributions with the Board's GPP Committee.

All contributions are made on a nonpartisan basis without regard to the personal political preferences of individual employees, executives or Board members.



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Boeing's Global Advocacy

As a leading global aerospace company, Boeing develops, manufactures and services commercial airplanes, defense products and space systems for customers in more than 150 countries. Boeing's global reach includes employees and operations in more than 65 countries. The company has manufacturing, service and technology partnerships with companies and governments worldwide and contracts with a diverse group of more than 20,000 suppliers and partners.

One of the United States' largest exporters, Boeing works closely with its many partners and suppliers around the world to create world-class aerospace products. Our business growth benefits local partners, customers, shareholders and employees globally. Boeing's increasing in-market presence and local partnerships in key global markets help us to expand our business even more. Partnerships with the world's best companies and research institutions enable us to capture emerging opportunities, establish long-term relationships and win new business.

Boeing's international advocacy aims to ensure our business can continue to operate and grow globally. We have senior local leaders in 22 countries and regions outside the United States. For example, the Boeing team in Brussels leads the company's efforts in support of key European Union (EU) policies that strengthen trans-Atlantic ties; advance Europe's sustainable economic growth; contribute to a safe, innovative and competitive aviation system; and connect EU citizens and businesses. This work plays an important role in Boeing's continued success in the global market. In Brussels and wherever we engage with governments outside the United States, Boeing operates with the highest ethical standards, ensuring we comply with local advocacy and procurement integrity law.

EU Transparency Register

As it does in the United States, in the EU, Boeing advocates for its priorities in accordance with all local reporting requirements and adheres to the highest standards of ethical behavior and accountability. View Boeing's voluntary disclosure on the EU Transparency Register [here](#).

One of the United States' largest exporters, Boeing works closely with its many partners and suppliers around the world to create world-class aerospace products.



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Engagement With Third-Party Organizations

Boeing believes that executing on our long-term strategy includes actively engaging and sharing our viewpoints on relevant public policy matters through memberships in industry associations.

Boeing is a member of several different types of third-party organization associations:

- Industrywide organizations, which advocate for major issues common to the aerospace industry. For example, Boeing is a member of the Aerospace Industries Association (AIA), which advocates for policies that support a robust aviation ecosystem, drive aviation safety and enhance innovation.
- General business associations, such as the National Association of Manufacturers (NAM), which advocate for growing the manufacturing workforce, trade, transportation and investment in technology innovation.
- Regional and international business associations, such as the Business Council of Alabama and the US-ASEAN Business Council Inc., which allow Boeing to build deeper local connections, help grow our skilled workforce and promote local economic growth.

Boeing joins 501(c)(6) trade associations and other advocacy organizations (such as 501(c)(4) groups) that represent a broad spectrum of views on industry and policy issues important to our business interests. Boeing regularly advises its trade association partners on the company's public policy positions. However, given the wide range of issues addressed by these organizations and the diverse views and interests of their members, there may be areas in which Boeing's interests are not fully aligned with the interests or positions taken by an organization. Nevertheless, Boeing believes that the overall benefit of its memberships in trade associations outweighs the differences that may arise periodically.

Boeing's Government Operations team closely engages with partner industry associations and think tanks and reviews advocacy undertaken by such groups to ensure overall alignment with Boeing's values and business priorities. If a think tank or trade association takes a stance that differs from Boeing's, the Government Operations team works to educate the organization (or its members) on Boeing's position and attempts to find common ground. If common ground is not possible, Boeing prioritizes its efforts with other third parties with regard to that specific issue. In instances like this, Boeing communicates to the appropriate policymakers or regulators that the position in question does not reflect the company's views.

Additional details regarding these review processes and the involvement of the Board's GPP Committee can be found in the oversight and compliance procedures section of this report.

You can find a listing of the major third-party organizations of which Boeing is a member on the next page, along with information about the portion of dues that each association uses for lobbying purposes.

Boeing's Government Operations team closely engages with partner industry associations and think tanks and reviews advocacy undertaken by such groups to ensure overall alignment with Boeing's values and business priorities.



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Engagement With Third-Party Organizations

The Boeing Company 2023 Trade and Business Association Memberships

[2022 list here](#)

Annual Dues Range	Organization	Lobbying Portion
\$250,000 to \$500,000	Aerospace Industries Association	25%
	Alliance of Western Energy Consumers	18%
	Business Roundtable	28%
	General Aviation Manufacturers Association	12%
	National Association of Manufacturers	30%
\$100,000 to \$249,999	California Council for Environmental and Economic Balance	1%
	The Coalition for Deep Space Exploration	30%
	Greater St. Louis Inc.	11%
	Washington Roundtable	18%
\$50,000 to \$99,999	Association for Uncrewed Vehicle Systems International	55%
	Association of Washington Business	75%
	Dallas Regional Chamber	6%
	Seattle Metropolitan Chamber of Commerce	9%
	National Business Aviation Association	50%
	Professional Services Council	2%
	United States Council for International Business	2%
	U.S. Chamber of Commerce	35%
	U.S.-India Business Council	35%
	\$25,000 to \$49,999	Chicagoland Chamber of Commerce
Council of the Americas		5%
Economic Alliance Snohomish County		20%
Irving-Las Colinas Chamber of Commerce		6%
Intellectual Property Owners Association		6%
National Environmental Development Association		5%
Satellite Industry Association Inc.		18%
South Carolina Chamber of Commerce		25%
South Carolina Manufacturers Alliance		18%
U.S.-Africa Business Center		35%
US-ASEAN Business Council Inc.		1%
Brazil-U.S. Business Council		35%
US-China Business Council		10%
U.S.-Japan Business Council		35%
Washington Council on International Trade		25%



Engagement With Third-Party Organizations

Trade Association Advocacy: Key Boeing Partners



Aerospace Industries Association (AIA)

AIA is the country's leading aerospace industry association, representing both defense and civil companies. AIA works to advance the global leadership of the American aerospace and defense industries by advocating for effective federal investments, technology innovation, aviation safety, and solutions for workforce and supply chain issues. Boeing works closely with AIA, given a multitude of shared priorities.



Association for Uncrewed Vehicle Systems International (AUVSI)

AUVSI is the world's largest nonprofit dedicated to advancing uncrewed systems and robotics, representing members from over 60 countries across civil and defense markets. AUVSI advocates for both air and maritime vehicles, and is an important partner for Boeing on uncrewed system regulation.

BR Business Roundtable

Business Roundtable (BRT)

BRT is an association of CEOs from over 200 top American businesses. Through a variety of committees on topics relevant to Boeing, ranging from workforce to education to tax, CEOs develop policy recommendations for which the organization advocates. BRT promotes American competitiveness and sound economic policies across the aisle.



The Coalition for Deep Space Exploration (CDSE)

CDSE is a leading industry advocate for more than 50 businesses, working to ensure the U.S. retains its leadership of space exploration, science, technology and international cooperation. The coalition promotes long-term and sustainable investments in America's space industry and works with members of the Boeing Defense, Space & Security business to guide policy advocacy.



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Trade Association Advocacy: Key Boeing Partners



General Aviation
Manufacturers Association

General Aviation Manufacturers Association (GAMA)

GAMA is a leading trade organization for the global business and general aviation industry, working to advance the industry's interests and highlight the role aviation plays in economic growth and critical transportation services. Manufacturing and aviation safety are key focuses for GAMA.



NATIONAL ASSOCIATION OF
Manufacturers

National Association of Manufacturers (NAM)

The NAM represents 14,000 companies across the American manufacturing industry, guided by its values of free enterprise and competitiveness. As a leading American manufacturer, Boeing engages with the NAM on issues including transportation, environment and trade, in addition to a variety of workforce issues.



PROFESSIONAL
SERVICES
COUNCIL

Professional Services Council (PSC)

PSC represents over 400 members of the American government technology and professional services industry, acting as a strong partner for Boeing's government services. Much of PSC's work focuses on acquisitions and contracting, in addition to industrial base and appropriations issues.



U.S. Chamber of Commerce

U.S. Chamber of Commerce (Chamber)

The Chamber is the world's largest business organization, advocating for policies friendly to business. Boeing works with the Chamber across a broad range of issues including transportation, sustainability, cyber, tax and trade to help shape the direction of the Chamber's advocacy work. In addition to its domestic work, the Chamber also sponsors several international business councils with which Boeing works to advance international sales.



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Climate Policy Development

Sustainability is a business imperative rooted in Boeing's values. The Board, and specifically the GPP Committee, oversees a variety of sustainability topics and Boeing's chief sustainability officer (CSO) is an Executive Council member reporting to Boeing's CEO. The CSO reports the progress of Boeing's sustainability objectives and stakeholder-oriented reports regularly to the GPP Committee and the full Board. The CSO also leads Boeing's Global Sustainability Council and Extended Council, which consist of global leaders from across business units and functions that provide leadership, partnership and action to advance objectives and strategy for sustainability. Together, we are committed to ensuring that our political activities align with the company's values, business strategies, long-term shareholder interests and long-term strategic imperatives.

Boeing supports the objectives of the Paris Agreement, and we consider climate change to be an urgent issue. Boeing supports the commercial aviation industry's ambition to achieve net-zero carbon emissions for global civil aviation operations by 2050. As discussed previously, Boeing maintains memberships in numerous organizations and engages on a diverse set of topics that relate to our business, supply chain, customers, and communities where we work and live. We welcome debate and discussion on topics that are relevant to us and our stakeholders and look for opportunities to provide our perspective on many policy topics, including environment and sustainability.

For more on Boeing's progress and path toward a sustainable aerospace future, read our latest Sustainability Report [here](#).

Trade Association Climate Advocacy: Key Boeing Partners



Aerospace Industries Association (AIA)

Sustainability is one of AIA's priorities, and the association works to support industry commitments to environmental, social and governance (ESG) goals. AIA also promotes technological innovation and research and development. Boeing has worked with AIA on its efforts to provide the U.S. government with relevant policy feedback.

BR Business Roundtable

Business Roundtable (BRT)

Many BRT member companies are taking a leading role in helping decarbonize their industries. BRT believes that economic growth and sustainability can be achieved together and, to that end, encourages the administration and Congress to update regulations, establish investment incentives and streamline permitting processes. Through market-based mechanisms and collaboration with business, BRT believes the United States can move toward a cleaner future. Boeing monitors BRT's climate initiatives and weighs in through active committee participation.

Boeing supports the commercial aviation industry's ambition to achieve net-zero carbon emissions for global civil aviation operations by 2050.



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Trade Association Climate Advocacy: Key Boeing Partners



National Association of Manufacturers (NAM)

The NAM highlights the efforts manufacturers have taken to reduce their climate impacts and the important role they play in developing future energy technologies. The NAM stresses, however, that the U.S. government needs to tailor environmental regulations so as to not disadvantage American manufacturers globally and must balance sustainability with commercial feasibility. Through working group participation, Boeing helps shape the NAM's approach to relevant policy advocacy.



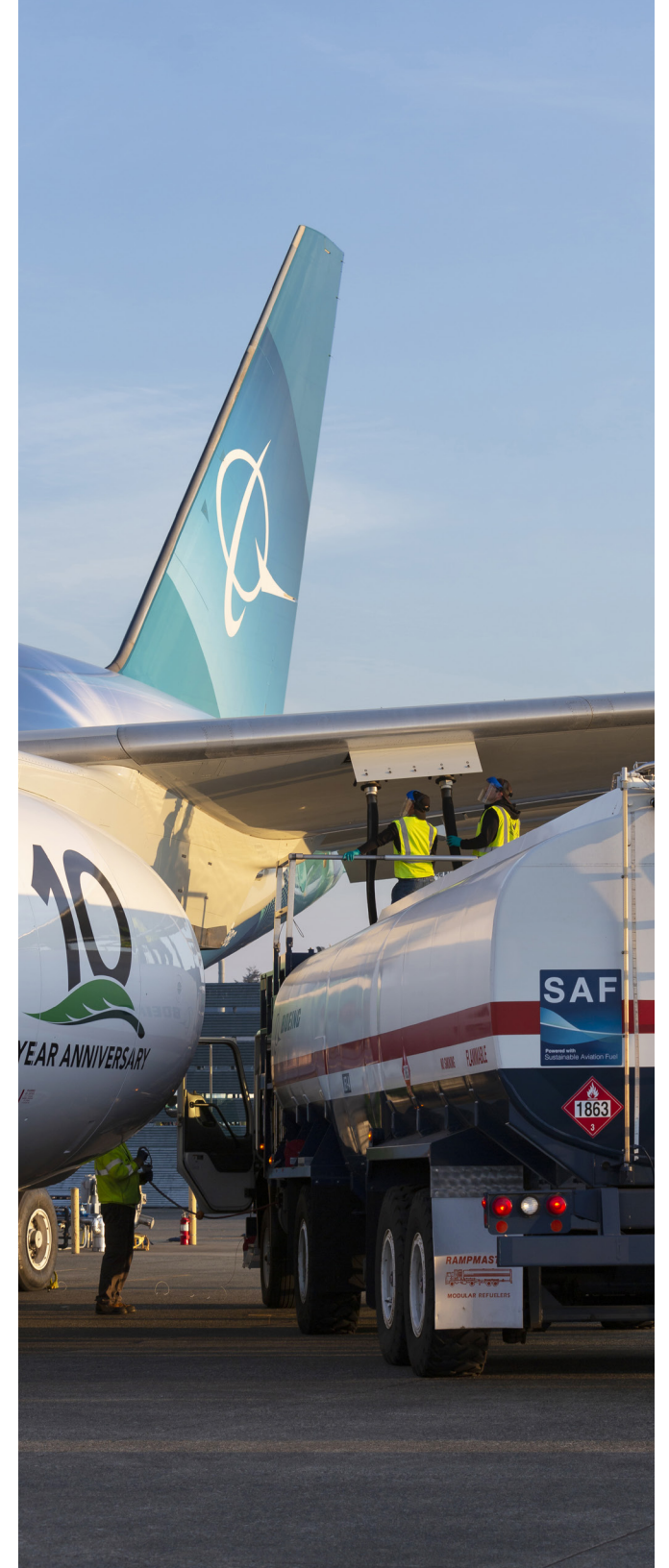
U.S. Chamber of Commerce (Chamber)

The Chamber recognizes the important role that businesses have to play in the fight against climate change and advocates for collaboration with governments and individuals to solve the challenge through market-based solutions, engagement with policymakers and bipartisan legislation. Boeing frequently provides the Chamber with policy suggestions that feed into its advocacy.



Association of Washington Business (AWB)

AWB is Washington state's oldest and largest business organization, representing members across the state. AWB supports efforts to reduce emissions while retaining access to affordable energy and minimizing impacts on the state's manufacturing workforce and infrastructure. The association also advocates for alignment between state and federal climate policy. Through AWB's committees, Boeing works to shape their position on important environmental policies.



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U.S. Legislative Advocacy

Boeing engages in the legislative process to communicate our views on legislative and regulatory matters affecting our business. Our legislative advocacy strives to ensure the U.S. business environment is conducive to global aerospace and defense leadership and supports long-term American manufacturing competitiveness and innovation. We share our expertise with policymakers and stay abreast of the opportunities and impacts of legislation and regulation.

Our advocacy focuses on three priorities:

- Protecting and advancing the company's interests, competitiveness and reputation.
- Supporting Boeing programs.
- Shaping public policy issues that impact the company.

Examples of legislation we've advocated around include:

- S. 1939, FAA Reauthorization Act of 2023.
- H.R. 1818 and S. 1561, Aviation Workforce Development Act.
- H.R. 3772 and S. 368, Aviation WORKS Act.
- H.R. 3935, Securing Growth and Robust Leadership in American Aviation Act.
- Fiscal Year 2024 Appropriations legislation.
- Fiscal Year 2024 Intelligence Authorization legislation.
- Fiscal Year 2024 NASA Authorization legislation.
- H.R. 2670 and S. 2226, National Defense Authorization Act for Fiscal Year 2024.

Reporting Our Advocacy

Boeing complies with the requirements of the Lobbying Disclosure Act and the Byrd Amendment, as well as all applicable reporting requirements. The EVP of Government Operations, working closely with the Law and Global Compliance function, maintains a comprehensive lobbying compliance program, including complete and timely lobbying registration and reporting.

Federal 2023 Lobbying Disclosure Act Reports

LD-2 (quarterly lobbying reports)

[4Q23](#)

[3Q23](#)

[2Q23](#)

[1Q23](#)

LD-203 (semiannual contribution reports)

[YE-23](#)

[MY-23](#)

Federal 2022 Lobbying Disclosure Act Reports

LD-2 (quarterly lobbying reports)

[4Q22](#)

[3Q22](#)

[2Q22](#)

[1Q22](#)

LD-203 (semiannual contribution reports)

[YE-22](#)

[MY-22](#)

We share our expertise with policymakers and stay abreast of the opportunities and impacts of legislation and regulation.



U.S. Legislative Advocacy

In the States

On this page, please find links and navigation instructions that will guide you to information regarding Boeing's registered advocacy at the state level and amounts paid, if any, to contract lobbyists in 2023.



Arizona

Search PPB Name: Boeing
Click "Start Search"
Contract lobbying
expenses: none



California

Contract lobbying
expenses: \$89,583



Florida

Select Calendar Year: 2023
Select View: By Principal
Click the letter B
and scroll down
Contract lobbying
expenses: none



Illinois

Click "Advanced Searches"
Click "Lobbying Entity"
Click "Submit"
Select Registration Year: All
Click "Contains"
Search Name: Boeing
Click "Submit"
Contract lobbying
expenses: none



Missouri

Search Principal
Name: Boeing
Click "Search"
Contract lobbying
expenses: \$128,500



Oklahoma

Principal Name: Boeing
Search Type: Contains
Click "Search"
Contract lobbying
expenses: none



Oregon

Select Set Year: 2022-2023
Search Business Name: Boeing
Click "Generate Report"
Contract lobbying
expenses: none



South Carolina

Search Name: Boeing
Click "Name Contains"
Click "Next"
Click "The Boeing Company"
Contract lobbying
expenses: \$60,000



Texas

Click "By Client Name"
Select Year: 2023
Search Client Last/Entity
Name: Boeing
Click "Search"
Contract lobbying
expenses: \$63,500



Washington

Search: Boeing
Click "Boeing"
Contract lobbying
expenses: \$127,000

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U.S. Political Contributions

BPAC is the single method Boeing uses to make political contributions. BPAC is not funded with corporate dollars. Instead, BPAC is funded solely from the voluntary, personal contributions from its members, who are eligible Boeing employees and retirees.

BPAC may direct contributions to federal campaigns, as well as to state and local campaigns, ballot initiatives, PACs and political parties. BPAC conducts this work under the supervision of the BPAC Advisory Board. All BPAC contributions are made on a nonpartisan basis and in accordance with objective criteria established by the Advisory Board and the EVP of Government Operations in compliance with applicable laws and regulations. Contributions are made on the basis of a candidate's policy positions on business issues of importance to the aerospace industry and to the company and its shareholders, as well as a candidate's integrity, character and commitment to good government.

Further details regarding the contribution approval process can be found in the oversight and compliance procedures section of this report.

You can find a full list of all candidates and committees to which BPAC contributed in 2023 [here](#). BPAC's 2021 to 2022 contributions may be found [here](#).

Boeing received a perfect score of 100% on the [2023 CPA-Zicklin Index of Corporate Political Disclosure and Accountability](#) and continues to be recognized as a "trendsetter."

BPAC is the single method Boeing uses to make political contributions. BPAC is not funded with corporate dollars. Instead, BPAC is funded solely from the voluntary, personal contributions from its members, who are eligible Boeing employees and retirees.





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