

**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
Washington, D.C. 20549  
Form SD  
Specialized Disclosure Report**

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**The Boeing Company**

(Exact Name of Registrant as Specified in its Charter)

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**Delaware**  
(State or Other Jurisdiction  
of Incorporation)

**1-442**  
(Commission File No.)

**91-0425694**  
(I.R.S. Employer  
Identification Number)

**929 Long Bridge Drive, Arlington, VA**  
(Address of Principal Executive Offices)

**22202**  
(Zip Code)

**Jeffrey R. Miller, 312-544-2806**  
(Name and telephone number, including area code, of the  
person to contact in connection with this report.)

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Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1 to December 31, 2022.
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## Section 1 - Conflict Minerals Disclosure

### Item 1.01 Conflict Minerals Disclosure and Report

A copy of The Boeing Company's (the "Company") Conflict Minerals Report is provided as Exhibit 1.01 to this Form SD and is publicly available at [www.boeing.com/investors](http://www.boeing.com/investors).

### Item 1.02 Exhibit

A copy of the Company's Conflict Minerals Report is provided as Exhibit 1.01 to this Form SD.

## Section 2 - Exhibits

### Item 2.01 Exhibits

<u>Exhibit</u>	<u>Description</u>
1.01	<a href="#">Conflict Minerals Report as required by Items 1.01 and 1.02 of this Form SD</a>

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## SIGNATURE

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

### THE BOEING COMPANY

By: /s/ Brian J. West

Brian J. West

Executive Vice President and Chief Financial Officer

Dated: May 25, 2023

**The Boeing Company  
Conflict Minerals Report  
For The Year Ended December 31, 2022**

**I. Overview**

The Boeing Company (herein referred to as “Boeing,” the “Company,” “we,” “us,” or “our”) submits this report pursuant to Rule 13p-1 (the “Rule”) promulgated under the Securities Exchange Act of 1934, as amended.

Boeing is one of the world’s largest aerospace firms. Our principal products include commercial jet aircraft, manned and unmanned military aircraft, rotorcraft and tilt-rotor aircraft, as well as missile and weapons systems, satellites and launch vehicles. We are organized based on the products and services we offer into the following three major businesses:

- Commercial Airplanes;
- Defense, Space & Security; and
- Global Services.

***Commercial Airplanes***

This segment develops, produces and markets commercial jet aircraft principally to the commercial airline industry worldwide. We are a leading producer of commercial aircraft and offer a family of commercial jetliners designed to meet a broad spectrum of global passenger and cargo requirements of airlines. This family of commercial jet aircraft in production includes the 737 narrow-body model and the 767, 777 and 787 wide-body models. We ended production of the 747 wide-body model in 2022. Development continues on the 777X program and the 737-7 and 737-10 derivatives.

***Defense, Space & Security***

This segment engages in the research, development, production and modification of manned and unmanned military aircraft and weapons systems for strike, surveillance and mobility, including fighter and trainer aircraft; vertical lift, including rotorcraft and tilt-rotor aircraft; and commercial derivative aircraft, including anti-submarine and tanker aircraft. In addition, this segment engages in the research, development, production and modification of the following products and related services: strategic defense and intelligence systems, including strategic missile and defense systems, command, control, communications, computers, intelligence, surveillance and reconnaissance (C4ISR), cyber and information solutions, and intelligence systems, satellite systems, including government and commercial satellites and space exploration.

***Global Services***

This segment provides services to our commercial and defense customers worldwide. Global Services sustains aerospace platforms and systems with a full spectrum of products and services, including supply chain and logistics management, engineering, maintenance and modifications, upgrades and conversions, spare parts, pilot and maintenance training systems and services, technical and maintenance documents, and data analytics and digital services.

### **3TG in Our Products**

Our products are highly complex, containing thousands of parts from thousands of direct and indirect suppliers throughout the world. Typically, multiple tiers exist between the tin, tantalum, tungsten and gold (3TG) mines and our direct suppliers. Therefore, we rely on our direct suppliers to work with their suppliers in order to provide us with accurate information about the origin of 3TG in the materials, components, parts and subassemblies (collectively, "Components") we purchase. Since 2013 we have required new supplier contracts and renewals of existing supplier contracts to provide us with the 3TG information necessary to conduct our due diligence. For contracts executed prior to 2013, we encourage, but cannot compel suppliers to support our due diligence efforts with respect to 3TG content.

### **II. Reasonable Country of Origin Inquiry ("RCOI")**

Our RCOI included identification of relevant suppliers, survey of suppliers and assessment of data received from suppliers. We conducted an inquiry of our approximately 11,000 suppliers from 58 countries to determine the country of origin of the products provided to Boeing. Due to the complexity and size of the supply chain, we developed a risk-based approach that focused on a subset of our major direct suppliers that are manufacturers (the "Suppliers"). The Suppliers represented more than 93 percent of our purchase order payments related to Components that may contain 3TG content. We took measures to determine the country of origin in accordance with Step 2 of the Due Diligence Guidance for Responsible Supply Chains of Minerals From Conflict-Affected and High-Risk Areas of the Organisation for Economic Cooperation and Development ("OECD") and its supplements on 3TG ("OECD Guidance").

We asked Suppliers of Components that we believe could contain 3TG to provide information to us using the template developed by the Responsible Minerals Initiative ("RMI"), known as the Conflict Minerals Reporting Template (the "Template"). The Template was developed to facilitate disclosure and communication of information regarding smelters and refiners that provide 3TG to a manufacturer's supply chain. It includes questions regarding a direct supplier's conflict-free policy and its due diligence process, and requests information about its supply chain for 3TG, including the names and locations of smelters and refiners, as well as the country of origin of 3TG used by such smelters and refiners. We then submitted the responses into an electronic database to facilitate information analysis.

## **OECD Step 1. Establish Strong Company Management Systems**

### ***Conflict Minerals Policy***

Boeing is committed to promoting economic development in Africa, including the Democratic Republic of the Congo and adjoining countries (the “Covered Countries”), through responsible commercial engagement. As part of this commitment, we have adopted a Conflict Minerals Policy related to our sourcing of 3TG. It can be found at [http://www.boeingsuppliers.com/supplier\\_principles.html#/compliance](http://www.boeingsuppliers.com/supplier_principles.html#/compliance). Boeing is committed to working with our global supply chain to promote adherence to the U.S. Securities and Exchange Commission’s (SEC) conflict minerals rule. Our compliance program follows the framework established by the OECD.

### ***Internal Team***

Boeing’s internal team that performs due diligence and implements our conflict minerals compliance strategy related to 3TG is comprised of subject matter experts from enterprise functions including supply chain, engineering, finance, law, corporate compliance, global engagement, as well as our Boeing Global organization.

### ***Control Systems***

During the year covered by this report, we participated – together with other major manufacturers across multiple industries – in the RMI and the Aerospace Industries Association (“AIA”) Conflict Minerals Working Group, which are helping to support conflict-free supply chains. As a member of the AIA Conflict Minerals Working Group, we also supported the AIA’s letter (distributed by RMI) to smelters to support responsible mineral sourcing and build conflict-free smelter capacity.

Boeing maintains a records retention policy with respect to relevant documentation.

### ***Supplier Engagement***

Boeing maintains an electronic portal that provides detailed instructions to suppliers and resources related to conflict minerals, including the Template, our Conflict Minerals Policy, our Supplier Code of Conduct, as well as FAQs from the AIA and the SEC. In addition, Boeing’s supply chain team, which includes representatives from a number of management functions within Boeing, meets with members of industry working groups including AIA and RMI subgroups to discuss due diligence best practices.

### ***Grievance Mechanism***

Boeing has processes to receive and act on concerns – both written and oral – expressed by employees and others about possible improper or unethical business practices or violations of company policies (including our Code of Conduct, Supplier Code of Conduct, Code of Basic Working Conditions and Human Rights, and Conflict Minerals Policy), laws, or regulations. This process is available to our suppliers, and Boeing’s supplier contracts include terms directing suppliers and their employees to the process to raise concerns.

## **OECD Step 2. Identify and Assess Risks in the Supply Chain**

The vast majority of the Suppliers that responded to our request provided data only with respect to that Supplier’s overall 3TG sourcing, without specifying the origin of the 3TG used in the Components actually supplied to Boeing. Therefore, the RCOI did not provide us with sufficient information to determine the source of the 3TG in our products. Accordingly, we conducted further due diligence on the source and chain of custody of 3TG in our products.

### **III. Due Diligence Design and Performance**

#### ***Design of Due Diligence***

Pursuant to the Rule, we performed due diligence on the source and country of origin of 3TG in our products, including the Components we purchase. Our due diligence measures have been designed in accordance with the framework presented in OECD Guidance and its supplements.

#### ***Due Diligence Performed***

We performed due diligence measures in accordance with the framework established by the OECD.

#### **OECD Step 3. Design and Implement a Strategy to Respond to Identified Risks**

- Senior leaders from each of Boeing's supply chain organizations are briefed about our conflict minerals due diligence reporting requirements and efforts.
- We have implemented a risk management plan that outlines the Company's responses to identified risks.
- We regularly assessed identified risks, largely relying on suppliers' data submissions to us, as well as, where appropriate, targeted follow-up activities. There was no instance where we determined that it was necessary to implement risk mitigation efforts, temporarily suspend trade or disengage with a supplier.

#### **OECD Step 4. Carry Out Independent Third-Party Audit of Smelter/Refiner's Due Diligence Practices**

We supported all aspects of the 3TG smelters and refiners audit scope through our membership in the RMI (RMI Member Code: BOEI). In addition, we encouraged smelter or refiner participation in RMI. We participated in the RMI Due Diligence Practices Group, the Cobalt Working Group, Plenary Sessions, and the RMI Stakeholders Group. We are also members of the AIA Conflict Minerals Working Group.

#### **OECD Step 5. Report Annually on Supply Chain Due Diligence**

This Conflict Minerals Report constitutes our annual report on our 3TG due diligence, and is available on our website [www.boeing.com](http://www.boeing.com) and is filed with the SEC.

### **IV. Due Diligence Results**

We reviewed all of the supplier responses, including those not provided on the Template, against criteria developed by our internal team to determine whether further due diligence engagement was necessary. Our criteria included reviewing incomplete responses, as well as inconsistencies within the data reported by our suppliers, and we have worked directly with those suppliers in an effort to secure further responses.

The vast majority of the suppliers that responded to our request set forth data only with respect to that supplier's overall 3TG sourcing, without specifying the origin of the 3TG used in Components supplied to Boeing. A minority of responses listed specific smelters or refiners ("SoRs") in their supply chain, with such responses collectively identifying 343 facilities as identified by the Responsible Minerals Assurance Process ("RMAP") of which 229, or 67%, were included on the RMAP Conformant Smelters & Refiners List.

Of the suppliers that provided SoRs, 32 indicated that they may have sourced 3TG from the Covered Countries; however they were unable to verify that 3TG from those SoRs was used in Components supplied to Boeing, and therefore, the SoRs they reported are excluded from this report.

The remaining 82 facilities are on the RMAP Active Smelter & Refiners List.

For the reasons set forth above, our supply chain was unable to identify the country of origin of 3TG contained in the Components supplied to us or the facilities used to process such 3TG.

#### **V. Expected Future Actions**

We intend to continue the following actions to improve the due diligence we conduct to further mitigate the risk that the 3TG in our products benefit armed groups in the Covered Countries:

- Continue to include a conflict minerals provision in new or renewed contracts requiring that suppliers provide us with the necessary 3TG information.
- Direct our suppliers to information and training resources in an effort to increase the response rate and improve the content of the supplier survey responses.
- Participate in the RMI in order to increase the number of smelters and refiners participating in the RMAP.
- Work with the OECD and relevant trade associations to define and improve best practices and encourage responsible sourcing of 3TG.
- Investigate making additional investments in conflict minerals due diligence toolsets.
- In the event that any of our suppliers are found to be providing us with Components containing 3TG from sources that support conflict in the Covered Countries, work with them to establish alternative sources of 3TG.

#### **Caution Concerning Forward-Looking Statements**

Certain statements in this report may be “forward-looking” within the meaning of the Private Securities Litigation Reform Act of 1995. Words such as “may,” “should,” “expects,” “intends,” “projects,” “plans,” “believes,” “estimates,” “targets,” “anticipates,” and similar expressions generally identify these forward-looking statements. Examples of forward-looking statements include statements relating to our future plans, as well as and any other statement that does not directly relate to any historical or current fact. Forward-looking statements are based on expectations and assumptions that we believe to be reasonable when made, but that may not prove to be accurate. These statements are not guarantees and are subject to risks, uncertainties and changes in circumstances that are difficult to predict. Many factors, including those set forth from time to time in our other filings with the SEC, could cause actual results to differ materially and adversely from these forward-looking statements. Any forward-looking statement speaks only as of the date on which it is made, and we assume no obligation to update or revise any forward-looking statement whether as a result of new information, future events or otherwise, except as required by law.