

Whereas, we believe in full disclosure of Boeing’s lobbying activities and expenditures to assess whether Boeing’s lobbying is consistent with its expressed goals and in its shareholder interests.

Resolved, the shareholders of Boeing request the preparation of a report, updated annually, disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications
2. Payments by Boeing used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient
3. Boeing’s membership in and payments to any tax-exempt organization that writes and endorses model legislation
4. Description of management’s and the Board’s decision-making process and oversight for making payments described above

For purposes of this proposal, a “grassroots lobbying communication” is a communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on the legislation or regulation and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation. “Indirect lobbying” is lobbying engaged in by a trade association or other organization of which Boeing is a member. Both “direct and indirect lobbying” and “grassroots lobbying communications” include efforts at the local, state and federal levels.

The report shall be presented to the Audit Committee or other relevant oversight committees and posted on Boeing’s website.

Supporting Statement

Boeing spent \$179,300,000 from 2010 – 2020 on federal lobbying. This does not include state lobbying, where Boeing also lobbies but where disclosure is uneven or absent. For example, Boeing spent \$1,116,000 on lobbying in California from 2010 – 2020. And Boeing also lobbies abroad, spending between €500,000 – €599,999 on lobbying in Europe for 2020. Boeing has attracted scrutiny for funding the EU Reporter, described as “EU lobbying dressed up as journalism.”¹

Companies can give unlimited amounts to third party groups that spend millions on lobbying and often undisclosed grassroots activity, and these groups may be spending “at least double what’s publicly reported.”² Boeing belongs to the Business Roundtable, National Association of Manufacturers and US Chamber Commerce, which together spent \$108,148,000 on lobbying for 2020. Boeing does not disclose its payments to trade associations and social welfare organizations, nor amounts used for lobbying, including grassroots. Grassroots lobbying

¹ <https://www.politico.eu/article/brussels-eu-media-peddling-undisclosed-influence/>.

² <https://theintercept.com/2019/08/06/business-group-spending-on-lobbying-in-washington-is-at-least-double-whats-publicly-reported/>.

does not get reported at the federal level under the Lobbying Disclosure Act, and disclosure is uneven or absent in states.

We are concerned that Boeing's lack of disclosure presents reputational risk when its lobbying contradicts company public positions or takes controversial positions. For example, Boeing believes in addressing climate change, yet the Chamber opposed the Paris climate accord. Boeing signed a statement opposing state voter restrictions, yet the Chamber lobbied against the For the People Act.³ And while Boeing has previously drawn scrutiny for avoiding federal taxes,⁴ its trade associations are lobbying against raising corporate taxes to fund health care, education and safety net programs.⁵

³ <https://thehill.com/business-a-lobbying/business-a-lobbying/554430-watchdog-group-launches-campaign-to-pressure?rl=1>.

⁴ <https://itep.org/boeing-paid-tax-rate-of-8-4-in-previous-decade-but-trump-to-speak-about-why-it-needed-his-corporate-tax-cut/>.

⁵ <https://www.washingtonpost.com/us-policy/2021/08/31/business-lobbying-democrats-reconciliation/>.