

Employee Corrective Action Process Requirements (ECAPR)

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1. Introduction

The purpose of this writing is to provide information and procedural guidance regarding implementation of employee corrective action (ECA) per the requirements set forth in PRO-1909, “Administration of Employee Corrective Action”. In addition, this writing must be used to support the process set forth in BPI-3946, “Employee Corrective Action Review Boards”. BPI-3946 identifies specific requirements for cases being reviewed by an ECARB, and specifically requires all cases involving executive employees be reviewed by an Executive ECARB. Please refer to BPI-3946 if mitigating or aggravating factors are being considered.

The goal of ECA is to correct unacceptable conduct and to avoid its repetition. The Expected Behaviors for All Boeing Employees ([Section 6](#)) and the following matrix were designed to establish fair and consistently applied rules of conduct. In support of Corporate Human Resources and Administration strategies, this procedural guidance was developed by the Global Diversity and Employee Rights (GDER) organization, with contributions from key stakeholders. This document is designed to enhance and deploy a consistent enterprisewide ECA process.

This document was developed and is maintained by the GDER–ECA organization to provide managers, Human Resources professionals, and employees with information and procedural guidance on ECA. It is designed to be a one-stop resource document. Although printing a copy may be convenient, it is not recommended. The information is updated often, and printed copies may not reflect the most current version.

2. Investigations

Investigations may be conducted by HR, management, Equal Employment Opportunity (EEO), Corporate Investigations (CI), Ethics and Business Conduct, the Law Department, Corporate Audit, or other appropriate entities. Documentation should be handled in accordance with procedure [PRO-2227](#), “Information Protection.”

When reviewing a completed investigation, ensure that the bulleted items below are included in the final report. If the report does not provide adequate information to make an ECA determination, then coordinate with the investigator to retrieve missing data.

- Clearly identified violation of the following:
 - Boeing Code of Conduct. (Form number F70088)
 - Expected Behaviors for all Boeing Employees. ([Section 6](#))
 - Other policy, procedure, process, or management expectation.
- Identification of all parties involved.
- Timeline and location of events.
- Verified factual details of the incident.
- Respondent(s) and witness(es) statements.

3. Employee Corrective Action Matrix

3.1 Matrix Introduction

Use this matrix to review the facts and findings of the investigation. Consider the General Factors Matrix when making the employee corrective action (ECA) decision along with the relevant Expected Behavior Categories of misconduct identified below. Determine how egregious the misconduct was and what the appropriate level of ECA should be.

Identify the General Factors, if any, which apply and then the appropriate violation codes from the listed Expected Behavior Categories in the Violations Matrix (see [section 3.3](#)). Consider multiple violations, as necessary, to ensure the facts of each case are thoroughly addressed.

The mitigating and aggravating factors included in the matrix below are not all-inclusive with respect to the possible types of violations that may occur. The mitigating and aggravating factors identified in the General Factors and Expected Behavior Categories are provided to support and solidify a decision to mitigate or aggravate the final ECA outcome. Mitigating and aggravating factors cannot be used to justify reducing or increasing the level of ECA more than one step without concurrence from GDER–ECA.

3.2 General Factors Matrix

General Factors	Definition	Mitigating and Aggravating Factors
Active ECA History	<p>If an employee has active ECA of similar Expected Behavior Categories on file or multiple corrective actions across categories (Code 3O), then progressive action is appropriate.</p> <p>Minor violations (which usually result in verbal warning) occurring after Time Off From Work (TOFW) has been issued should be evaluated on a case by case basis for progressive ECA. These cases need to be coordinated with an ECA Program Manager before action is taken.</p> <p>Note: there are exceptions for violation codes 3M, 3L, and 3Q; refer to these codes below in sections 4.1 and 4.2.</p>	<p>Mitigating: never</p> <p>Aggravating: always</p>
Length of Company Service	<p>Length of company service may impact the employee's understanding or exposure to company expectations, communications, or culture.</p> <p>Long service with no prior ECA history in cases where discharge is a consideration as an initial step of ECA may mitigate the level.</p> <p>Application of this factor requires coordination with Corporate ECA.</p>	<p>Mitigating: possibly</p> <p>Aggravating: possibly</p>
Job Related Training or Experience	<p>An employee's job training or experience should be examined when the behavior or violation is related to the employee's performance of his or her job.</p>	<p>Mitigating: no training or experience in the issue being reviewed.</p> <p>Aggravating: employee has training or experience in the issue being reviewed.</p>

3. Employee Corrective Action Matrix – *continued*

General Factors	Definition	Mitigating and Aggravating Factors
Access to Company Communication, Training, Coaching, and/or Counseling on Expectations	An employee's access to management or the company's expectations through company communications, training, or coaching and counseling.	Mitigating: no evidence of access. Aggravating: evidence by means of testimony, transcripts, e-mails, notes, or other forms of documentation.
Effect on Customers, Suppliers, Employees, or Others	Behaviors or violations cause a specific negative impact or measurable negative effect on customers, suppliers, employees, or others.	Mitigating: no impact or effect. Aggravating: impact or effect is clearly identifiable or measurable.
Impact on the Company's Business	Behaviors or violations cause an actual specific negative impact or measurable negative effect on quality, cost, delivery, safety, morale, or reputation.	Mitigating: never Aggravating: impact or effect is clearly identifiable or measurable
Illegal Acts	Application of this factor requires coordination with GDER ECA and the Law Department.	Mitigating: never Aggravating: possibly
Violations of a Government Regulatory Compliance Requirement	Behaviors or actions which violate government regulatory compliance requirements. Includes but is not limited to requirements by federal, state, and local governments both foreign and domestic, as well as from the military and emergency responders.	Mitigating: never Aggravating: possibly
Voluntary Disclosure Prior to Discovery	Employee reporting of misbehavior or violations prior to discovery by the company. Admission by employee during an investigation or questioning does not constitute voluntary disclosure.	Mitigating: possibly Aggravating: never
Concealment or Destruction of Information	Any effort by an employee to conceal or destroy information or data. Note: Failing to disclose information or the omission of information during an interview or investigation does not apply.	Mitigating: never Aggravating: possibly
Passage of Time After Violation or Discovery	Excessive passage of time between the violation and its discovery or between the discovery and a decision to take corrective action. Application of this factor requires coordination with Corporate ECA.	Mitigating: possibly Aggravating: never
Responsibility as a Representative of the Company	Additional examination should occur when behaviors or violations are directly related to the following roles: <ul style="list-style-type: none"> ▪ Management ▪ Employees with leadership responsibility ▪ Agents of the company 	Mitigating: never Aggravating: possibly

3. Employee Corrective Action Matrix – *continued*

3.3 Violations Matrix

1. Treat Others and Expect to Be Treated With Respect, Dignity, and Trust

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
EEO (Must be investigated by EEO or Designee)	1B	PRO-4332 PRO-784 PRO-6929	<p>Harassment Policy (EEO—Excluding Sexual)</p> <p>Verbal, written, graphic, or visual communication (e.g., text, images, or other materials) or physical conduct that shows hostility or aversion toward an individual (or group) because of his, her, or their protected status or otherwise unreasonably interferes with the performance of work, creates a hostile or intimidating work environment, or adversely affects employment opportunities.</p> <p>Usually results in time off from work.</p> <p>(For Non-EEO Harassment, refer to 1K.)</p>	<p>Mitigating: single incident, not directed at a person; no offensive intent; minimal impact.</p> <p>Aggravating: actions are persistent; intentional; repeated; malicious; have significant impact; harmful; high level of risk; or disruptive.</p>
	1M	PRO-4332	<p>Harassment Policy (EEO Sexual Only)</p> <p>Sexual harassment: Unwelcome sexual advances, requests for sexual favors or other verbal, written; graphic; visual communication (e.g., text, images, or other materials); or physical acts of a sexual or gender-based nature when:</p> <ol style="list-style-type: none"> 1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; 2. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or <p>Usually results in discharge.</p>	<p>Mitigating: none presently identified.</p> <p>(If not discharged, sexual harassment training required.)</p> <p>Aggravating: none presently identified.</p>

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
EEO (Must be investigated by EEO or Designee)	1M	PRO-4332	<p>3. Such conduct or exposure has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating or hostile working environment, and/or sexually related material is involved.</p> <p>Usually results in time off from work.</p> <p>Sexual harassment training required.</p>	<p>Mitigating: single incident, not directed at a person; no offensive intent; minimal impact.</p> <p>Aggravating: using position of authority; actions are persistent; intentional; repeated; malicious; significant impact; harmful; high level of risk; or disruptive; sexual images of children; employees engaging in sexual acts or exposure of self.</p>
			<p>4. Repeated advances for a social or personal relationship that is absent of overt or implied sexual expression.</p> <p>Usually results in a written warning.</p> <p>Sexual harassment training required.</p>	<p>Mitigating: no offensive intent; minimal impact.</p> <p>Aggravating: using position of authority; actions are malicious; significant impact; harmful; or disruptive.</p>
	1N	PRO-4332	<p>Touching (EEO)</p> <p>Unwanted physical contact of a sexual nature.</p> <p>Usually results in time off from work.</p> <p>Sexual harassment training required.</p>	<p>Mitigating: no offensive intent, minimal impact.</p> <p>Aggravating: using position of authority; intentional touching in a sexual manner; actions are persistent; repeated; or malicious; aggressive; significant impact; high level of risk; harmful or disruptive.</p>
	1O	<p>POL-5 PRO-784 PRO-6929</p>	<p>Discrimination (EEO)</p> <p>Adverse decisions in any terms and conditions of employment, including recruiting, hiring, transfers, promotions, terminations, compensation, and benefits based on any of the following factors is prohibited: race, color, religion, national origin, gender, sexual orientation, age, physical or mental disability, or veteran status. (Applies to applicants as well as employees.)</p> <p>Usually results in time off from work.</p>	<p>Mitigating: no intent to harm.</p> <p>Aggravating: using position of authority; actions are persistent; repeated, or malicious; harmful; or disruptive; significant impact/risk.</p>

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
EEO (Must be investigated by EEO or Designee)	1P	POL-5 PRO-4332 PRO-1870 PRO-6929 PRO-784	Retaliation (EEO) Retaliation, adverse actions against a person who has made an EEO complaint, participated in an EEO investigation, or given information regarding possible violations of EEO policy. Usually results in time off from work.	Mitigating: non-egregious or minimal impact. Aggravating: using position of authority; actions are egregious; persistent; repeated; or malicious; harmful; or disruptive significant impact/risk.
	1Q	PRO-784 PRO-6933 PRO-2368	Accommodation Failure to adhere to the policy of the company to provide reasonable accommodations to qualified individuals with a disability who are applicants or employees, and who can perform the essential functions of their job, with or without accommodation, without direct threat or undue hardship. Usually results in a written warning.	Mitigating: none presently identified. Aggravating: actions are persistent; intentional; repeated; malicious; significant impact; harmful; high level of risk; or disruptive.
	1S	POL-5 PRO-4332	Failure to take action and/or report allegations of conduct that may violate the company's EEO policies and procedures to an appropriate GDER EEO office or GDER EEO representative. Usually results in written warning. (For non-EEO, refer to 3S.)	Mitigating: single incident, non-egregious, minimal impact; some action taken but not reported to GDER EEO. Aggravating: significant liability; impact; harm; or disruption; harassment continued; ignoring repeated behavior or complaints; using position of authority; persuading or manipulating others not to report EEO allegations.
Harassing or Disruptive Behavior (Non-EEO)	1K		Verbal, written, graphic, or visual communication or conduct that is disruptive, shows hostility or aversion toward an individual (or group), or otherwise unreasonably interferes with the performance of work or the work environment. Usually results in a written warning.	Mitigating: none presently identified. Aggravating: actions are persistent; repeated; or malicious; misuse of position; communications depicting death or violent physical injury.

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Intimidation or Coercion	1I		An action or behavior that reasonably causes a person to be fearful for his or her well-being, personal safety, or condition of employment. Pressuring or influencing others against their will. Usually results in a written warning.	Mitigating: none presently identified. Aggravating: bullying; aggressive behavior; stalking; misuse of position or authority; personal benefit; repetitive incidents.
Physical Confrontation	1D	PRO-1870	Physical actions. Examples include but are not limited to spitting, poking, bumping, scuffling, shoving, or pushing. Attempt to control or detain. Usually results in time off from work.	Mitigating: ability to retreat or escape was not an option; attempt to prevent the aggressive behavior against self or others. Aggravating: results in accident or injury.
			Aggressive physical actions. Examples include but are not limited to hitting, biting, kicking, punching or use of an object that could increase harm. Usually results in discharge.	Mitigating: ability to retreat or escape was not an option; attempt to prevent harm against self or others. Aggravating: none presently identified.
Physical Contact (Non-EEO)	1L		Non-aggressive, unwanted, and unnecessary non-sexual touching of another individual. Usually results in a written warning.	Mitigating: none presently identified. Aggravating: persistent and repeated intentional actions.
Pranks and Hoaxes	1J		An action, behavior, or circumstance directed at a person or group that has a negative impact. Usually results in a written warning.	Mitigating: none presently identified. Aggravating: persistent and repeated; causes significant disruption; results in damage or injury.
Retaliation (Non-EEO)	1R	POL-2 PRO-3 PRO-780 BPI-3751	Adverse action(s) against a person who has made or is perceived to have made a complaint, participated in an investigation, given information regarding possible violations of company policy, or reported an alleged wrongdoing through formal channels. Usually results in time off from work.	Mitigating: none presently identified. Aggravating: legal violation or negative impact on the business, actions are egregious, persistent, repeated, or malicious, significant harm or disruption, using position of authority.

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Sexually Related Material or Behavior (Including Pornography)	1C	POL-5 PRO-10 End User Security Manual	Any actions, communications or media (e.g., text, images, or other materials) in any format that portrays nudity, pornography, images of partially clothed persons displayed in sexual poses or sexual acts, or sexually provocative material. Usually results in time off from work. Note: If involves exposure, refer to EEO for review.	Mitigating: single incident with no exposure to others. Aggravating: sexual images of children, employees engaging in sexual acts, or indecent exposure on company property.
Threats	1A	PRO-1870	Any communication, including body language, that involves a threat to harm and may cause fear or reasonable concern for the safety, health, or well-being of others or property; includes threat to harm self in the workplace. Usually results in time off from work. Site Security and site Threat Management Team must be contacted prior to any employee corrective action associated with this code.	Mitigating: none presently identified. Aggravating: possession of a weapon; physical contact; calculated plan to harm; directed specific threat to harm; multiple concurrent incidents.
Unacceptable Communication or Unacceptable Non-Work-Related Materials	1E		Communication or media (e.g., text, images, or other materials) that is uncivil, insulting, derogatory, or demeaning about any group or individual through humor, opinion, or innuendo. In addition, language that is profane, obscene, or offensive. Usually results in a written warning. (Refer to EEO Violations, if applicable) (For nudity and pornography, see 1C). Note: If involves exposure, refer to EEO for review.	Mitigating: language (including expletives) that is used while not in conversation with another person; single incident with no exposure. Aggravating: communications that are combative or malicious; repeated or forced exposure to an unwilling recipient; material involving hate groups; depictions of death or physical injury; images of children.
			Name calling that is uncivil, insulting, vile, profane, obscene, or offensive and directed at a person. Usually results in time off from work.	Mitigating: none presently identified. Aggravating: none presently identified.

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3. Employee Corrective Action Matrix – *continued*

2. Protect the Assets of Boeing, and Assets Entrusted to Boeing, Against Damage, Loss, Misuse, and/or Theft				
Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Creating an Unacceptable Liability	2F		<p>Any action or lack of action that has caused a financial or legal liability for the company or has created the expectation of liability for the company.</p> <p>Usually results in time off from work.</p> <p>GDER ECA must be contacted for any employee corrective action associated with this code.</p>	<p>Mitigating: minimal liability.</p> <p>Aggravating: repetitive events and/or significant liability.</p>
Damage to Property	2D	PRO-388	<p>Any action or lack of action that results in damage, defacement, or destruction to company, customer, supplier property, product, or employee property.</p> <p>Usually results in a written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: willful; disregard for process, procedure, or instruction; significant impact.</p>
Failure to Protect Company Issued Electronic Equipment or Data Storage Devices	2I	Boeing Security Manual PRO-10 PRO-98 PRO-2227	<p>Insufficient steps taken to protect company-issued electronic equipment or data storage devices, resulting in loss or compromise. Includes but not limited to laptops, BlackBerries, tablets, smartphones, memory sticks/cards/thumb drives, diskettes, etc.</p> <p>Usually results in a written warning.</p> <p>Note: If loss includes proprietary information or intellectual property, review violation code 2H. All executive cases should be routed to GDER ECA director for review and ECARB determination.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: device had unencrypted or unprotected PII; proprietary, limited, or sensitive data (negligence or not).</p>

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Information – Misuse or Failure to Protect Information or Intellectual Property of Others, Company, Customer, Competitor, or Supplier	2H	Boeing Security Manual PRO-70 PRO-98 PRO-1003 PRO-2227 PRO-3439 PRO-5122 PRO-5124 PRO-6375 PRO-6901 BPI-3735	<p>Failure to protect; damage; unapproved access, unapproved possession, disclosure, distribution, or misuse of information or other intellectual property of the company, its employees, customers, suppliers, competitors, or others. Includes any failure to adhere to the requirements of the procedures referenced for this violation code.</p> <p>Failure to protect non-public information in accordance with the Federal Trade Commission Consent Order re: United Launch Alliance (ULA).</p> <p>Failure to report known incidents that violate the definition above.</p> <p>Usually results in a written warning.</p>	<p>Mitigating: acting under direction of authority; affected intellectual property is already in public domain.</p> <p>Aggravating: acts that subject company/supplier/competitor/non-Boeing information or intellectual property to the risk of compromise; removals, additions or changes of markings to Boeing Proprietary Information without approval from owning organization management; actions taken to circumvent company information security protection measures.</p> <p>A review for potential discharge will occur when: there is an actual loss of information, trade secret protection, rights to intellectual property; and/or employee actions jeopardize Boeing's ability to acquire, leverage, or protect intellectual property.</p>
Possession of Property or Resources of Others, Company, Customer, Competitor, or Supplier	2A	PRO-10 PRO-70	<p>Unauthorized possession of property or resources of another employee, company, customer, competitor, or supplier; includes having unauthorized custody of materials or equipment belonging to Boeing, other Boeing employees, or Boeing suppliers, competitors, or customers.</p> <p>Usually results in time off from work.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: personal profit; repetitive acts; community funds or personal belongings; competitor-sensitive information.</p>

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Property – Misuse or Failure to Protect the Property or Resources of Others, Company, Customer, Competitor, or Supplier	2E	PRO-10 PRO-70 PRO-98 PRO-2227	<p>Any <i>unapproved use or misuse</i> of company property, resources or computing resources for purposes not related to the business of the company; includes Internet and e-mail.</p> <p>Usually results in verbal warning.</p> <p>(For Sexually Related Material, refer to 1C.)</p> <p>(For Misuse of Company Time, refer to 3F.)</p> <p>Note: If related to an issue of mischarging and/or misuse of company time, case must be reviewed by an ECARB.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: chain letters; personal profit; excessive activity or amount of material/data volume.</p>
			<p><i>Failure to safeguard or the loss</i> of property or resources of the Company, its employees, customers, suppliers, or competitors.</p> <p>Usually results in a written warning.</p> <p>(For Misuse of Company Time, refer to 3F.)</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: none presently identified.</p>
Sabotage	2C		<p>Any attempt or actual sabotage that is intended to disrupt business or damage company property, information, or resources of the company, customers, or suppliers.</p> <p>Results in discharge.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: none presently identified.</p>
Theft	2B		<p>Theft includes the unauthorized removal and possession of property or resources of another employee, company, customer, competitor, or supplier.</p> <p>Usually results in discharge.</p>	<p>Mitigating: minimal impact.</p> <p>Aggravating: none presently identified.</p>

3. Employee Corrective Action Matrix – *continued*

3. Produce, Design, and Support Our Products and Services in a Manner That Promotes the Interests of Boeing, Its Employees, Customers, and Suppliers				
Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
AWOL/Extended Absences	3L	Refer to site practices or expectations. Refer to PRO-1909 section 4.1	Extended/uninterrupted unexcused absences to include but not limited to: <ul style="list-style-type: none"> Uncovered Time/Reasons are Unacceptable Failure to return from LOA Unauthorized LOA Usually results in action controlled by site practices or expectations pre-established by management.	Refer to site practices.
Attendance	3M	Refer to site practices or expectations. Refer to PRO-1909 sections 4.1 and 4.4	Unsatisfactory attendance; failure to comply with site guidelines, practices, or expectations established by management. Usually results in progressive employee corrective action.	Refer to site practices.
Conducting a Personal Business – Running a Business	3I	PRO-10	Personal, outside business interests on company time or property, or with company resources. Usually results in time off from work.	Mitigating: isolated incidents that have little or no impact on the company; express or implied management authorization. Aggravating: impact on the business; excessive company time or resources used; any business that creates a conflict of interest.
Defective work product, service, or output	3R		Specific event(s) involving a failure to perform or provide a job related product/service/output where the employee has recently demonstrated acceptable performance to standards. Usually results in a written warning.	Mitigating: none presently identified. Aggravating: actions are deliberate, willful, or have significant impact.

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Failure to Act (non-EEO)	3S		<p>Management or company representative's failure to appropriately address violations of company expectations, policy, or procedure.</p> <p>Usually results in a written warning.</p> <p>(For situations that create a liability, refer to 2F.)</p> <p>(For Failure to act on general safety violations, refer to 5D.)</p> <p>(For Failure to act on High Hazard Safety violations, refer to 5F.)</p> <p>(For Failure to act on Pedestrian/Vehicle Safety violations, refer to 5G.)</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: significant impact, harm, or disruption; damage to the product, property or to Boeing's reputation.</p>
Failure to Comply	3E		<p>Failure to follow documented policies, procedures, or processes that have been previously communicated.</p> <p>Failure to follow instructions, perform designated work, or act or cease to act after being instructed or reminded.</p> <p>Usually results in a written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: disrupts production; confrontational or argumentative; repetitive.</p>
Failure to Detect	3T		<p>Management or company representative's failure to identify or detect behavior which violates company expectations, policy, or procedure, when company systems and available data clearly identify or support that a violation has occurred.</p> <p>Usually results in a written warning.</p> <p>(For situations that create a liability, refer to 2F.)</p> <p>(For work performance failures, refer to 3R.)</p>	<p>Mitigating: did not know or could not have detected the violation using reasonable care and/or the company was not required to review or sign off on the system or data and did not do so.</p> <p>Aggravating: significant impact, harm, or disruption; damage to the product, property or to Boeing's reputation.</p>

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Failure to Exercise Common Sense or Satisfactory Judgment	3N		<p>Actions or behaviors that demonstrate poor judgment or that are inconsistent with ordinary, reasonable, commonsense expectations.</p> <p>This code is used for actions or behaviors that are not addressed by other violation code(s) in this guideline.</p> <p>Usually results in a written warning.</p>	<p>Mitigating: no impact to property, product, or others.</p> <p>Aggravating: significant impact to the product, property, or the business; multiple events.</p>
Failure to Observe Established Work Schedule	3H	PRO-6912	<p>Unauthorized deviation from established shift, lunch, or break schedule.</p> <p>Usually results in a verbal warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: excessive work time lost.</p>
Foreign Object Debris/Damage (FOD)	3U	PRO-6865	<p>Failure to follow appropriate processes to avoid or eliminate foreign object debris/damage (FOD).</p> <p>Usually results in a written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: results in damage; safety of flight; significant impact to business.</p>
Horseplay	3B		<p>Physically active behavior that results in disruption or has the potential to create an unsafe workplace.</p> <p>Usually results in a written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: results in injury to self or others; damage to property, equipment, information, or resources of the company, customers, or suppliers.</p>
Insubordination	3D		<p>Refusing to follow a manager's direct order to act or cease to act on a business necessity that has been determined to be a condition of employment.</p> <p>Note: The employee <i>must</i> be given time to comply <i>and</i> warned that the failure to comply will result in discharge. Normally, another company representative should witness this process and if the employee fails to comply, he/she is escorted off company property.</p> <p>Results in discharge.</p>	<p>Mitigating: employee complies prior to being escorted off property.</p> <p>Aggravating: none identified.</p>

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Interfering With Production or the Performance of Work	3A		An activity or behavior that detracts from the business of the company or disrupts the productivity of other employees. Usually results in a written warning.	Mitigating: none presently identified. Aggravating: significant business or operational impact.
Leaving Company Premises Without Notification	3J		Failure to notify management or approved designee of departure from company premises and/or work location during scheduled work hours. Usually results in written warning. Note: If related to an issue of mischarging and/or misuse of company time and resources, case must be reviewed by an ECARB.	Mitigating: none presently identified. Aggravating: significant business or operational impact.
Misuse of Company Time	3F	PRO-10	Unauthorized use of company time spent on non-work-related activities or activity that is not supportive of the work assignment. Usually results in time off from work. Note: All Misuse of Company Time cases must be reviewed by an ECARB per BPI-3946.	Mitigating: minimal impact. Aggravating: excessive incidents; impact to business performance or financials; results in non-compliant labor charging. Significant impact or government action will result in a review for discharge.
Multiple Active Corrective Action Memos	3O	Refer to PRO-1909 section 4.3	Multiple active corrective actions (none of which in and of itself results in discharge). Usually results in time off from work. GDER ECA must be contacted for any employee corrective action associated with this code.	Mitigating: none presently identified. Aggravating: none presently identified.
Out of Work Area	3P		Unauthorized time away from assigned work area that is observed or confirmed. Usually results in a written warning. Note: If related to an issue of mischarging and/or misuse of company time and resources, case must be reviewed by an ECARB.	Mitigating: none presently identified. Aggravating: frequent or excessive time away; intentional concealment.

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3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Performance Issues	3Q	Refer to section 4.2	<p>Ongoing, unsuccessful achievement of management's performance expectations that have already been communicated to the employee.</p> <p>Usually results in a written warning and performance improvement plan. Failure to successfully complete performance improvement plan will result in further corrective action up to and including discharge.</p> <p>Note: The requirements identified in section 4.2 must be met to issue ECA for this violation code.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: none presently identified.</p>
Poor Housekeeping or Hygiene	3K	Refer to applicable site procedures.	<p>Clutter or a lack of cleanliness that causes a disruption to the work environment. This includes littering.</p> <p>Usually results in a verbal warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: repetitive incidents.</p>
Sleeping	3C		<p>Sleeping in assigned work area on company time.</p> <p>Usually results in a written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: creates a safety concern.</p>
			<p>Sleeping out of assigned work area on company time.</p> <p>Usually results in time off from work.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: Actions taken to prevent discovery; not easily visible or discovered; absence creates a hazardous work condition.</p>
Unauthorized Performance of Work	3G		<p>The performance of work without proper authorization.</p> <p>Usually results in a written warning.</p>	<p>Mitigating: where employee believed authorization was in effect based on previously accepted practice; minimal impact.</p> <p>Aggravating: personal gain.</p>

3. Employee Corrective Action Matrix – *continued*

4. Process and Report Information Accurately, Honestly, and Properly				
Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Concealing Defective Work	4B		Concealment of defective work. Results in discharge.	Mitigating: none presently identified. Aggravating: none presently identified.
False Statements or Omissions	4A		Making false statements or omitting pertinent information. Usually results in a written warning.	Mitigating: none presently identified. Aggravating: personal gain; creates the potential for, or causes harm to persons (emotionally or physically); adversely impacts the company's product, property, or reputation.
Falsification of Records	4C	PRO-6419	Providing false information or omitting pertinent information on records or documents submitted to or on behalf of the company, customers, or suppliers. Usually results in time off from work. Note: If related to an issue of mischarging and/or misuse of company time and resources, case must be reviewed by an ECARB per BPI-3946. (If time charging is indicated, refer to 4D.) (If unintentional misrepresentation or inaccurate entry refer to 4F)	Mitigating: unintentional misrepresentation. Aggravating: forgery; compliance concerns; significant personal or monetary gain; financial impact on the company.
Inaccurate or Improper Processing or Reporting of Information	4F		Failure to properly and accurately complete, process, or report information, including compliance violations. Usually results in a written warning.	Mitigating: minimal impact. Aggravating: significant impact.
Other Employment While on Leave of Absence (LOA)	4E	PRO-6929	Accepting other employment or self-employment while on an LOA without receiving written authorization from the Company. Usually results in time off from work.	Mitigating: authorization for other employment was approved after work commenced. Aggravating: violates the terms and conditions of the specific LOA.

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Time Recording/ Labor Recording Compliance	4D	PRO-31 PRO-35	Time recording failure or failure to comply with work authorization documentation requirements, which may be determined by labor recording compliance audits. Usually results in a written warning. Note: All cases of mischarging time must be reviewed by an ECARB per BPI-3946.	Mitigating: lack of knowledge of process/ documents; inability to provide work authorization documentation in an audit; inaccurate or untimely entries; clock in or out failures or failure to clock in or out at the assigned location. Aggravating: significant impact.
			Falsifying time records or recording time not worked; omitting pertinent information in time records; unauthorized recording of time by or for another employee; unauthorized charging to government contract. Usually results in time off from work. Note: All cases of mischarging time must be reviewed by an ECARB per BPI-3946.	Mitigating: none presently identified. Aggravating: significant personal or monetary gain. Significant impact or government action will result in a review for discharge.

3. Employee Corrective Action Matrix – *continued*

5. Build and Maintain a Safe and Healthy Environment for Our Employees, Customers, Suppliers, and Local Communities				
Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Failure to Report an Accident or Near Miss	5B	PRO-2869 BPI-1906 PRO-910	Failing to report in a timely manner a near miss or actual accident. Usually results in a written warning. (For risk of injury to others, refer to 5A and 5C, or disregard of safety instructions, refer to 5D.)	Mitigating: none presently identified. Aggravating: environmental impact; concealment.
Failure to Report Injury	5A	PRO-2869 BPI-1906 PRO-910	Failing to report an injury or lost time in a timely manner. Usually results in a written warning.	Mitigating: none presently identified. Aggravating: concealment.
High-Hazard Safety, Health and Environment Rules	5F	PRO-910 PRO-1023 PRO-1024 PRO-2821 PRO-5772 PRO-6616 PRO-6885 BPI-1713 BPI-2404 D148040180 F70114	Failure to follow policies, procedures, or instructions protecting safety, health or the environment regarding high-hazard processes as defined by Environmental, Health and Safety guidance. Management exhibiting behaviors which are contrary to a safe culture/environment or failure to appropriately address/report violations related to high-hazard or high-risk processes. Usually results in time off from work.	Mitigating factors: none presently identified. Aggravating factors: significant impact, additional behaviors which indicate a deliberate violation; disabling safety devices, equipment or protocols.
Pedestrian and Vehicle Safety	5G	Refer to site practices or expectations	Failure to follow site practice, policies, or procedures, pedestrian and/or vehicle safety expectations for the safe movement of vehicles or pedestrians on company property. Usually results in a written warning. (For violations related to high-hazard or high-risk processes, refer to 5F.)	Mitigating factors: none presently identified. Aggravating factors: multiple violations during a single event; other violations as identified by site practice.

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Safety and Health, Environment and Security and Fire Protection Rules	5D	PRO-2821 PRO-910	<p>Failure to follow policies, procedures, or processes protecting safety, health, or environment. Also, failing to follow Security and Fire protection rules or directions concerning safety.</p> <p>Management exhibiting behaviors that are contrary to a safe culture/environment or failure to appropriately address/report violations related to general safety processes.</p> <p>Usually results in written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: significant impact, additional behaviors that indicate a deliberate violation, disabling safety devices, equipment or protocols.</p>
Weapons or Explosives	5E	PRO-6102 PRO-1870 PRO-910	<p>Unauthorized possession of a weapon or explosive as defined by PRO-6102.</p> <p>Usually results in time off from work.</p> <p>Note: Due to variations in the individual state laws, consult with site Security before implementing this code.</p>	<p>Mitigating: possession of ammunition only.</p> <p>Aggravating: loaded weapon, brandishing, threatening, use, brought into work area.</p>
Workplace Injury With Fault	5C	PRO-2869 BPI-1906 PRO-910	<p>Injury to self.</p> <p>Usually results in written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: concealment; failure to use required Personal Protective Equipment.</p>
			<p>Injury to others.</p> <p>Usually results in time off from work.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: deliberate acts; concealment.</p>

3. Employee Corrective Action Matrix – *continued*

6. Adhere to Company Agreements, Policies, and Procedures				
Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Active Soliciting	6I	PRO-6603	Active solicitation of other employees for contributions, goods, or services for non-company sponsored activities. Usually results in a verbal warning.	Mitigating: none presently identified. Aggravating: coercive or aggressive pressure accompanies the solicitation; disruptive to the workplace.
Badges or Parking Credentials	6D	PRO-2779	Misuse of credentials such as badges, parking, or identification. Failure to properly escort visitors per Security directions. Usually results in a written warning. (Where time or entry records are being falsified as a result of such, refer to 4C and 4D.)	Mitigating: none presently identified. Aggravating: forging/altering existing credentials.
Basic Working Conditions and Human Rights	6X	Code of Basic Working Conditions	Violation of The Boeing Company Code of Basic Working Conditions and Human Rights. GDER-ECA and the Law Department must be consulted for any of these violations prior to any action being taken.	Mitigating: none presently identified. Aggravating: none presently identified.
Business Courtesies, Gratuities, or Bribes	6K	PRO-6 PRO-8	Offering, accepting, or soliciting something of value. Usually results in written warning.	Mitigating: single incident with minimal impact. Aggravating: legal violation or negative impact on the business. Offering, accepting, or soliciting a bribe will be reviewed for discharge.
Circulation, Posting, and/or Distribution Without Authorization	6J		Unauthorized circulation, posting, and/or distributing any information within the company or on company property. This includes unauthorized removal of authorized postings. Usually results in a verbal warning.	Mitigating: none presently identified. Aggravating: disruptive to the workforce; impacts the company's product, property, or reputation.

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Company-Issued Credit Cards (Corporate Travel and Business Expense card, Purchasing card)	6R	Boeing General Travel and Business Expense Policy Handbook PRO-33 PRO-232	General Issues Failure to comply with the terms and conditions of company-issued credit cards or Travel policies. <ul style="list-style-type: none"> Excessive cash advances, including domestic cash advances, for business purposes. Unauthorized purchases of work-related items such as computers, software, or other office supplies. Failure to submit expense report in a timely manner. Unauthorized use of a personal credit card for company-required travel and/ or business-related expenses. Usually results in a written warning.	Mitigating: single incident of accidental unplanned use. Aggravating: none presently identified.
			Personal Use of Company-Issued Credit Cards Single incident of accidental or unplanned personal use or failure to protect card. Usually results in written warning. Unauthorized personal use of the company-issued credit card. Usually results in time off from work.	Mitigating: single incident of accidental unplanned use with disclosure prior to EBC notification to management. Aggravating: none presently identified.
			Failure to Pay Credit Card Balances Failure to pay balances or initiate repayment plan, after being issued formal ECA (prior CAM verbiage must include repayment expectations). Usually results in progressive ECA based on prior formal ECA.	Mitigating: none presently identified. Aggravating: none presently identified.
			Exceptions Will Not Be Made for the Following: Charges for unauthorized expenditures that were paid in a timely manner without late payment charges. Employee indicates that he or she was not aware of the policy regarding no personal use.	

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Drugs and Alcohol	6H	PRO-388 PRO-6892	Alcohol Activity in the Workplace Unauthorized possession, sale, or purchase or gifting of alcohol on company premises. Usually results in time off from work.	Mitigating: alcohol in original, sealed, and unopened container. Aggravating: consumption or manufacture of alcohol on company premises.
			Drug Activity in the Workplace Unauthorized possession, consumption, sale, manufacture, or purchase of a controlled substance on company premises; possession of drug paraphernalia on company premises. Usually results in discharge.	Mitigating: none presently identified. Aggravating: none presently identified.
		PRO-388 PRO-6892	PRO-388 Violations For violations of the Drug and Alcohol Free Workplace Procedure, see and apply procedure PRO-388 or applicable site procedure(s). Consult DFW Focal	
Drugs and Alcohol		PRO-388 PRO-6892	DFW Program Compliance Positive test result or determination of refusal to test with failure to enter DFW program, falsifying or attempting to falsify an alcohol or drug test, failure to comply with the terms and condition of the DFW program, failure to notify a company Corporate Investigations representative within five days of a criminal drug statute conviction. Results in discharge.	Mitigating: none presently identified. Aggravating: none presently identified.
			Criminal Activity Not in the Workplace Commission of certain penal offenses for drug- or alcohol-related activity at or away from the workplace. Requires consultation with GDER-ECA and the Law Department.	

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3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Electronic and Recording Devices	6F	PRO-2783	<p>Unauthorized possession of a personal electronic device or a device which can capture images or audio recordings.</p> <p>Includes but not limited to: cameras, personal computing devices, cell phones, etc.</p> <p>Usually results in verbal warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: in a proprietary work area.</p>
			<p>Unauthorized use of a personal electronic device or a device which has captured an image or audio recording.</p> <p>Includes but not limited to: cameras, personal computing devices, cell phones, etc.</p> <p>Usually results in a written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: in a proprietary work area.</p>
Entering Restricted Areas	6N		<p>Unauthorized entry into restricted areas or onto company products. Includes escorting unauthorized individuals into restricted areas.</p> <p>Usually results in a written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: access violates regulatory or safety requirements; significant impact.</p>

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Ethical Misconduct	6Q	PRO-7 Ethical Business Conduct Guidelines	<p>Conflict of Interest</p> <p>Engaging in any activity that might create a conflict of interest or could create the appearance of a conflict of interest.</p> <p>A conflict of interest may exist when an employee is involved in an activity or has a personal interest that might interfere with the employee's objectivity in performing company duties and responsibilities.</p> <p>Personal interests may include working relationships and/or financial interests with immediate family members, relatives, or other close personal relationships. Activities include outside employment in areas similar to those in which The Boeing Company is involved; outside work for customers, suppliers, vendors, or competitors of Boeing; and operating as a supplier to Boeing. Holding a financial interest in a business concern that is a supplier, customer, partner, subcontractor, or competitor of the company constitutes a conflict of interest under certain conditions.</p> <p>Company transactions with other business entities must not be influenced by the personal interests or activities of its employees.</p> <p>Usually results in time off from work.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: negatively impacts the business or the reputation of The Boeing Company.</p>

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Ethical Misconduct	6T	POL-2 PRO-3 PRO-58 Ethical Business Conduct Guidelines	<p>Fairness and Favoritism</p> <p>Failure to conduct business fairly, impartially, without favoritism, in an ethical and proper manner, and in full compliance with applicable laws and regulations.</p> <p>Failure to promptly report any illegal or unethical conduct to management or other appropriate authorities (i.e., Ethics, Law, Corporate Investigations, EEO, HR, and Corporate Audit).</p> <p>Usually results in a written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: negative impact on the business, taking advantage of position for personal gain or abuse of position.</p>
	6O	POL-2 PRO-3 PRO-58 Ethical Business Conduct Guidelines Code of Conduct	<p>Failure to Sign Code of Conduct Certification Form</p> <p>Failure to sign certification form after determination has been made that there is no valid reason not to sign.</p> <p>Results in time off from work (five workdays all payrolls).</p> <p>Failure to sign form after return from time off from work results in discharge.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: none identified.</p>
Export and Import	6U	PRO-2805	<p>Failure to conduct business in accordance with company policy and in compliance with applicable laws and regulations (i.e., Federal Trade Commission Order) of the U.S. and other jurisdictions in which the company operates that govern exports or imports of commodities, software, technology, and services.</p> <p>Usually results in written warning.</p> <p>(If significant legal or financial liability is created, refer to 2F.)</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: Repetitive acts, compromise of export-controlled data; negative impact on the business; legal or financial liability; willful negligence; or intentional failure.</p>

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Failure to Adhere to the Leave of Absence Procedure	6S	PRO-6929 LOA Policy Handbook	Behavior or actions that violate the processes and/or responsibilities in the Leave of Absence procedure. Usually results in a written warning. (For other employment while on LOA, refer to 4E.)	Mitigating: none identified. Aggravating: none identified.
Failure to Comply with Settlement Agreement	6A		Behavior or actions that violate terms or conditions of the company/employee settlement agreement. Results in discharge.	Mitigating: none identified. Aggravating: none identified.
Government Classified Material	6B	BPI-4374 Boeing Security Manual	Infraction (per Boeing Program Security and BPI-4374): Any incident of noncompliance with a Program Security Directive or BSM requirement(s) that does not involve the loss, compromise or suspected compromise of classified information and is normally not reportable to the cognizant security authority (CSA). Usually results in a verbal warning.	Mitigating: none presently identified. Aggravating: repeated infractions.
			Violation (per Boeing Program Security and BPI-4374): Any incident of noncompliance with a Program Security Directive or BSM requirement(s) that could result in the loss, compromise, or suspected compromise of classified information and is reportable to the respective cognizant security authority (CSA). Failure to report known security violations involving government classified material. Usually results in written warning.	Mitigating: cannot apply mitigating factors. Aggravating: actions that are deliberate; acts of gross negligence; significant risk of compromise. Compromise with significant impact to the program will result in a review for discharge.

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Gambling or Lotteries	6L	PRO-6603	Includes activities such as games of chance, raffles, betting, or group lottery pools in which money or the opportunity for personal gain is involved while on company time or property (including online gaming on company computing equipment). Usually results in a written warning.	Mitigating: none presently identified. Aggravating: controlling, operating, or profiting from running the gaming operation.
Insider Trading	6V	PRO-12	Trading in the stock or other securities of The Boeing Company at any time when the employee, as a result of Boeing employment, has “material nonpublic” information about The Boeing Company. This includes trading in the stock or other securities of other firms, particularly those that are current or prospective customers or suppliers of Boeing and those with which Boeing may currently be negotiating. Communicating material nonpublic information to other persons who may misuse the information. Usually results in time off from work.	Mitigating: none presently identified. Aggravating: negative impact on the business, significant personal gain.
Parking Violations	6E	Refer to site practices or expectations.	Violating site parking expectations. Usually results in a verbal warning.	Mitigating: none presently identified. Aggravating: parking in a disabled stall or fire lane; blocking ingress and egress; other violations as identified by site practice.

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Smoking or Tobacco Use	6G	PRO-6403	<p>Unauthorized smoking or tobacco use. Controlled by site practices or expectations communicated by management.</p> <p>Note: Use of any product that could be mistaken for or gives the appearance of using tobacco and is deemed to be disruptive by management should be addressed using violation code 3E.</p> <p>Usually results in a verbal warning.</p> <p>(For safety issues, refer to 5D.) (For disruptive behaviors, refer to 1K.)</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: smoking in clearly marked areas such as ingress/egress areas, other high traffic areas, company buildings, or company vehicles.</p>
Traffic Management (Enterprise Supply Chain Logistics)	6W	PRO-836 Code of Basic Working Conditions	<p>Failure to conduct business in accordance with company policy and in compliance with applicable laws and regulations (i.e., EAR, ITAR, and FTR) of the U.S. and other jurisdictions in which the company operates that govern exports or imports of commodities, software, technology, and services.</p> <p>Usually results in a verbal warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: negative impact on the business.</p>
Unauthorized Entry	6C		<p>Entry or aiding other employees onto company property without proper authorization or credentials.</p> <p>Usually results in a written warning.</p>	<p>Mitigating: none presently identified.</p> <p>Aggravating: assisting a non-employee to gain entry onto company property without proper authorization.</p>

3. Employee Corrective Action Matrix – *continued*

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Travel and Assignment/Relocation Policy	6Y	PRO-6281 PRO-33 Boeing Travel Policy Handbook - 2016	Failure to comply with the terms and conditions of an assignment/relocation agreement or policy handbook. Unauthorized or misuse of cash advances provided for assignment/relocation purposes. Receiving duplicate payments—expensing the same expense/day twice. Usually results in time off from work.	Mitigating Factors: Incorrect type of payment/expensing method for assignment/relocation costs; failure to submit assignment/relocation expense report in a timely manner. Aggravating Factors: None presently identified
			Failure to Repay Assignment/Relocation Funds Failure to repay balances or initiate repayment plan, after being issued formal ECA (prior CAM verbiage must include repayment expectations) Usually results in progressive ECA based on prior formal ECA.	Mitigating Factors: none presently identified. Aggravating Factors: None presently identified
			Exceptions Will Not Be Made for the Following: Employee indicates that he or she was not aware of the policy regarding unapproved use of relocation funds.	

7. Abide by Applicable Laws and Regulations

Violation	EITS Code	Reference	Definition and ECA Level	Mitigating and Aggravating Factors
Espionage	7C		GDER–ECA and the Law Department must be consulted for any of these violations prior to any action being taken.	
Penal Offenses, Commission of	7A			
Subversive Activity	7B			
Supporting the Overthrow of the U.S. Government	7D			
Terrorism	7E			
Trafficking in Persons	7F	PRO-1909 FAR 52.222-50, “Combating Trafficking in Persons”		

4. Unique Employee Corrective Actions

4.1 Attendance and Absence Without Leave Corrective Action Issues

Attendance and Absence Without Leave (AWOL) issues are progressive only within their respective violation codes. This means that Attendance and AWOL are progressive only within the Attendance and AWOL violation codes (code 3M and 3L) and not with any other Expected Behavior Category 3 violations.

4.2 Work Performance Corrective Action Issues

Work performance issues, violation code 3Q, are progressive only within its respective violation code. This means that Work Performance is progressive only within the Work Performance violation code and not with any other Expected Behavior Category 3 violations. In addition, a CAM issued for violation code 3Q must be accompanied by a written Performance Improvement Plan (PIP). A PIP should not be issued unless it is issued with a 3Q CAM or a previously issued 3Q CAM is on file and still active.

A PIP can be resolved, extended or reused without impacting the 3Q CAM expiration or progressive ECA.

4.2.1 Requirements for Applying Violation Code 3Q

Before a CAM for violation code 3Q can be issued, the following conditions must be met by Management and the HR Generalist:

1. Management has previously communicated performance expectations and concerns to the employee, and the employee continues to not meet performance expectations.
2. The HR Generalist has met with the employee without management present to understand the employee's concerns or challenges relative to meeting management's performance expectations.
3. Management, with assistance from the HR Generalist, has generated a PIP consistent with the guidance in section 4.2.2 below, prior to issuing the CAM for violation code 3Q.

4.2.2 Requirements for Performance Improvement Plans (PIP)

A PIP is a *supplemental* document to the CAM, which provides detailed information about the performance deficiencies and expectations to facilitate constructive discussions between management and an employee. PIPs issued with a CAM for violation code 3Q must clearly identify and communicate the following information:

1. The performance expectations that are not being met by the employee.
2. The performance improvement goals and actions the employee must achieve to demonstrate satisfactory performance.
3. The period of time during which the performance review will be conducted.
4. A schedule for regular performance review meetings between management and the employee.
5. A statement of the consequences if the employee's performance fails to satisfy the expectations set forth in the PIP.

4. Unique Employee Corrective Actions – *continued*

4.3 Multiple Active Corrective Action (MACA) Memos (violation code 3O)

This action may be used when an employee has two or more active corrective action memos (CAM) on file that are in two different Expected Behavior Categories and is in the process of being issued a CAM in a third Expected Behavior Category. Once a MACA CAM (violation code 3O) is issued, any subsequent violations during the active period of the 3O CAM will result in review for progressive employee corrective action up to and including discharge. Attendance and Work Performance (Codes 3L, 3M, 3Q) CAMs are not to be included in any part of this process.

4.3.1 Requirements for MACA Memos

Use of the violation “Multiple Active Corrective Action Memos” – violation code 3O must comply with the following conditions:

1. The employee has two (2) or more active corrective action memos (CAMs) on file that are in two different Expected Behavior categories,
2. The employee is in the process of receiving an additional CAM in a third Expected Behavior category, at a level of written warning or higher, and
3. The employee is not receiving three (3) or more CAMs on the same date.

4.3.2 MACA Memo Process

1. GDER–ECA must be contacted, prior to initiating the 3O code.
2. The employee is issued two separate CAMs.
3. The first CAM details the violation currently under review. This CAM will include the appropriate violation code and level of corrective action for the violation.
4. The second CAM details the 3O violation and the resulting Time Off From Work (TOFW). If the current violation under review results in TOFW – this time would be served concurrently with the time incurred by the 3O violation.
5. Once the initial 3O CAM has been issued, any subsequent violation of company policy or management expectations (excluding Attendance violations or Performance Issues) which would normally result in a written warning or more, will result in a discharge as a progressive step of corrective action. The Primary Case code in Employee Issue Tracking System (EITS) will be 3O, and the Secondary Case code should reflect the subsequent violation.

Note: When the CAM for 3O Code is issued, the relevant active corrective actions on file will have their active period extended through the planned expiration date of the 3O CAM.

4. Unique Employee Corrective Actions – *continued*

4.4 Abated Discharges

An Abated Discharge is a unique ECA action which may occur during the issuance of an ECA Discharge CAM. A discharge may need to be abated when previously unknown information is revealed which makes proceeding with the discharge inappropriate but does not alter the facts associated with the original discharge decision.

4.4.1 Types of Abated Discharges

There are two specific situations where abating a discharge is appropriate. Any situations not associated with the two described below must be coordinated with GDER–ECA prior making a final decision to abate a discharge.

- *Drug Free Workplace Program (DFW)*: Per [PRO-388](#), “Drug and Alcohol Free Workplace Program,” the discharge of an employee for unacceptable attendance or work performance is abated when the employee acknowledges substance abuse, and the condition along with employee compliance is confirmed by the Employee Assistance Program (EAP).
- *Quit in Lieu of Discharge (QILD)*: In some situations, management and HR may determine it is in the company’s best interest to allow an employee to resign his or her employment rather than proceed with discharge. Issuing an abated discharge in this situation maintains the record of the original discharge decision. In these cases, HR needs to coordinate with GDER–ECA. In addition, the Law Department also needs to be contacted to determine if a settlement and release agreement is appropriate prior to making a final decision to abate the discharge.

4.4.2 Abated Discharge Process

1. The decision to abate is made. DFW cases must be coordinated with the appropriate DFW Focal and/or EAP. QILD cases require coordination with GDER–ECA and the Law Department. All other situations must be coordinated with GDER–ECA.
2. The discharge CAM is still issued to the employee.
3. Management records the decision to abate the discharge in a handwritten note on the discharge CAM. If this is a DFW issue, management also directs the employee to record the admission of substance abuse or dependency in the “Employee Remarks” section of the CAM.
4. Management makes a copy of the signed Discharge CAM with the notes above. The original is delivered to the employee, and the copy is given to the HR Generalist (HRG).
5. Upon receiving the Discharge CAM copy, the HRG will go into the ECA Case in EITS and change the “Resolution/Corrective Action” field to Abated Discharge. If this is a DFW issue, the HRG will coordinate with his or her DFW focal and/or EAP to verify the employee complied with the requirement to enter the DFW program. If this is a QILD case, the HRG will also need to record the QILD decision as a Note in the EITS case.
6. The HRG will then finalize the ECA Case in EITS and will follow the normal process for conveying the CAM copy to HR Operations. If this is a DFW issue, the HRG must first confirm employee compliance with DFW before taking this step.

4. Unique Employee Corrective Actions – *continued*

4.5 ECA Guidelines for International Employees

The terms and conditions of employment for most of our international Boeing employees are contractual in nature and are set forth either in collective bargaining agreements (for groups of union-represented employees) or in individual employment contracts. The collective bargaining agreements and individual employment contracts may address applicable corrective action (disciplinary) procedure. The legal systems in many countries will also restrict how or what corrective action can be administered.

Because of these variables in the international context, reviewing of cases will be done on a country-by-country and, within a particular country, on a case-by-case basis. The general approach for our international locations will be as follows:

1. Are the terms and conditions of employment for this employee governed by a contract, a collective bargaining agreement, or an individual employment contract?
2. If yes, does the contract contain provisions about employee corrective action? This may also require that past practice be taken into consideration.
3. If yes, then we will comply with the terms of the contract.
4. If no to the above questions, then there will be a review of the proposed corrective action process to confirm that it is in accordance with applicable law. Boeing Corporate, Human Resources, Global Diversity and Employee Rights, and the Law Department will conduct this review, coordinating with their counterparts at the local site or business unit, as appropriate.
5. If applicable local law does not affect implementation of the corrective action process, we will proceed with implementation.
6. If applicable local law does affect implementation, we will modify the proposed corrective action process to comply with applicable local law.

5. Corrective Action Memo (CAM)

5.1 Purpose

The CAM is used to formally notify an employee of the following:

1. The nature and level of formal corrective action.
2. The employee's violation or area of management concern.
3. The action(s) required by that employee to solve the problem.
4. The consequences of not solving improving behavior or repeating unsatisfactory behavior.

5.2 System Requirement

A corrective action memo must be issued through EITS whenever formal employee corrective action is administered for a Written Warning, TOFW, or Discharge.

5.3 Process Steps

Follow these steps when preparing and issuing a CAM:

1. Clearly state the nature or level of action being taken and the unacceptable conduct in detail.
2. Describe previous corrective actions, if any, taken by management to correct the conduct (e.g., verbal warning or previous CAMs).
3. Where discharge is not administered, identify the corrective action required by the employee to solve the unacceptable conduct.
4. Review the memo and obtain concurrence from the Human Resources organization before issuing it to the employee.
5. Where discharge is not administered, advise the employee that failure to demonstrate an immediate and sustained correction of unacceptable conduct will result in a review for further corrective action, up to and including discharge.
6. Give the employee an opportunity to comment on and sign the corrective action memo, acknowledging receipt.
7. If the employee declines to sign the CAM, note this in the "Employee Signature" section and obtain the signature of a witness within management or HR.
8. Provide the employee with the original CAM.
9. Ensure that the ECA record is properly annotated in EITS by the end of shift of the day the corrective action was issued.
10. Send the CAM and supporting documentation to Human Resources Operations Employee Support Center. The documentation will be scanned and stored in the Personnel Records Link (PRL), an electronic records management application.

5. Corrective Action Memo (CAM) – *continued*

Appropriate supporting documentation must all be relevant to the case determination and may be included with the CAM. Examples include:

- HR Investigation Report.
- Statements from complainants, witnesses, and respondents.
- Investigation Materials from HRG or management (i.e. reports, documents, desk instructions).
- Specific documentary evidence supporting the CAM (i.e., forms or photos).
- Data runs (i.e., records from timekeeping, turnstile, production, etc.).

Inappropriate materials which are not relevant to the case determination should not be included as supporting documentation with the CAM. In addition, reports, materials or data already stored or maintained in some other location or company system should not be included as supporting documentation. Examples include:

- Investigation Reports from Corporate Audit, Corporate Investigations, EEO, and Security.
- Physical evidence.
- Work histories.
- Corrective Action Cover Sheet or Checklist.
- E-mail communications that are not evidence.
- Privileged communications with the Law Department.
- Training rosters.

6. Expected Behaviors for All Boeing Employees



Expected Behaviors for all Boeing Employees

All employees are expected to adhere to the behaviors below. Violations of these behaviors will result in appropriate corrective action measures being taken, up to and including discharge.

1. TREAT OTHERS AND EXPECT TO BE TREATED WITH RESPECT, DIGNITY, AND TRUST.
2. PROTECT THE ASSETS OF BOEING, AND ASSETS ENTRUSTED TO BOEING, AGAINST DAMAGE, LOSS, MISUSE, AND/OR THEFT.
3. PRODUCE, DESIGN, AND SUPPORT OUR PRODUCTS AND SERVICES IN A MANNER THAT PROMOTES THE INTERESTS OF BOEING, ITS EMPLOYEES, CUSTOMERS, AND SUPPLIERS.
4. PROCESS AND REPORT INFORMATION ACCURATELY, HONESTLY, AND PROPERLY.
5. BUILD AND MAINTAIN A SAFE AND HEALTHY ENVIRONMENT FOR OUR EMPLOYEES, CUSTOMERS, SUPPLIERS, AND LOCAL COMMUNITIES.
6. ADHERE TO COMPANY AGREEMENTS, POLICIES, AND PROCEDURES.
7. ABIDE BY APPLICABLE LAWS AND REGULATIONS.

A more detailed listing, with examples of infractions for each of the above categories, is included in PRO-1909, "Administration of Employee Corrective Action".