

SETTING THE STANDARD

CODE OF ETHICS AND BUSINESS CONDUCT

Do What's Right
Respect Others
Perform With Excellence

LOCKHEED MARTIN 

SETTING THE STANDARD

Updated September 2020

Holding the tablet on the cover is Paul Williams who was the recipient of the 2019 Lockheed Martin NOVA Award for Ethics.

Lockheed Martin Corporation

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Bethesda, MD 20817

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In addition to English, this booklet is published in the following languages: Arabic, Chinese (Simplified), Chinese (Traditional), French, German, Hebrew, Indonesian, Japanese, Korean, Malay, Polish, Romanian, Spanish and Turkish

Note: The most current version of this document is available online via the Lockheed Martin Corporation internal network and externally at <http://www.lockheedmartin.com/us/who-we-are/ethics/code-of-ethics.html>. The online version provides the most recent updates for resource materials, including Corporate Policy Statements and Cross Functional Procedures.

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At Lockheed Martin, we believe in living our core values, to Do What's Right, Respect Others, and Perform with Excellence. This means maintaining the highest standards of ethical business conduct across our company.

Our values serve as our North Star, enabling us to maintain operational excellence and cultivate innovation. So I encourage each of you to read – to understand – and to uphold our Code of Ethics and Business Conduct, also known as “*Setting the Standard.*”

Our Code connects our shared values, our unwavering standards, and the policies we have in place to guide our leaders, teams, and actions every day. That's why our Code clearly states our zero-tolerance policy for harassment, discrimination and corruption.

The Code also explains expectations at work and any time we act on behalf of the company. One of the most important ways we show our commitment to these shared values is by encouraging you to take action if you see behavior inconsistent with Lockheed Martin standards and expectations. And if you witness violations of policy or law, you have an obligation to report them.

We know speaking up is not always easy. However, no matter what your role or position, you can always step forward without any fear of retaliation.

I thank you for your commitment to uphold the high ethical standards that guide our company and sustain our success for years to come. By working as One Lockheed Martin, together we can ensure our ethics and integrity are never compromised.

Jim Taiclet, President and Chief Executive Officer









Our Values

Lockheed Martin sets the standard for integrity in everything we do. We demand this of ourselves just as others, including our stakeholders and customers, expect this of us.

Key Policies

- CPS-001 Ethics and Business Conduct



| | |
|---|--|
|  | We Lead with Integrity |
|  | We Respect Others |
|  | We Demonstrate Accountability |
|  | We Conduct Business Fairly |
|  | We Care about our Work Environment |
|  | We Promote Good Corporate Citizenship |

WE LEAD WITH INTEGRITY

Honesty and integrity engender trust, which is the cornerstone of our business.

- We Uphold the Code
- We Report Violations
- We Participate in Training
- We Take Action



We Uphold the Code

WE SET THE STANDARD

- Our Code establishes the principles by which we maintain our commitment to ethical business practices, which often go beyond what the law requires.
- Our Code applies to Lockheed Martin employees, our Board of Directors, consultants, contract laborers and others representing or acting for our **Corporation**.*
- We follow both the letter and the spirit of the laws and regulations that govern our business and the countries in which we operate.
- We do not take any illegal or unethical action, even if it appears to benefit the Corporation or is directed by a higher authority in the organization.
- We cooperate in **investigations** relating to violations of the Code or our policies.

* Any **waiver** of the Code for executive officers or members of the Board of Directors may be made only by the Board or a Board committee and must be promptly disclosed to our stockholders on our website.

Investigations: You must notify the Legal Department, Ethics Office or Security if you learn that a government agency or any third party is conducting an investigation or asking for information pertaining to a suspected violation of law. We must never destroy or alter any documents or electronic records, lie to or mislead an investigator or obstruct the collection of information relating to an investigation or any legal action brought on behalf of, or against, the Corporation. To the greatest extent possible, we will cooperate with government agencies responsible for investigating suspected violations of the law. If requested by Lockheed Martin, we will cooperate with investigations conducted by any government.

Why It Matters

- Maintaining the trust of employees, our customers and stakeholders is essential to ensuring sustainable success.

What to Watch Out For

- Violations of the Code may result in disciplinary action up to and including termination.
- Leaders are accountable for actions that could influence employees to violate our Code.

Key Policies

- CPS-001 Ethics and Business Conduct
- CPS-718 Disclosures to the United States Government
- CRX-021 Internal Investigations



Guidance for Leaders when Approached with a Question or Concern:

- Thank the employee for coming forward
- Listen carefully
- Ask for clarification and additional information to fully understand the concern
- Answer any question that you can, but seek help if you need it before responding
- You don't have to provide an immediate response, but follow up with the employee as soon as possible
- Report any possible violation so that it may be investigated

Waiver: This prevents waivers of the Code from being hidden from the public and complies with New York Stock Exchange (NYSE) requirements and similar rules

under the Securities and Exchange Commission and the Sarbanes-Oxley Act of 2002.

We Report Violations

WE SET THE STANDARD

- We take prompt action to **report** violations of the Code, policy or a contract provision.

Why It Matters

- Any one of us may be the only person to see or suspect a potential violation. If we don't report it, who will?
- Timely reporting may allow issues to be resolved before they become bigger issues.

What to Watch Out For

- Failure to report may itself be a violation of this Code.

Key Policies

- CRX-021 Internal Investigations

Report: *If you have reason to believe that questionable or illicit conduct exists, you must contact your supervisor, manager, Human Resources Business Partner, Ethics Officer, Security, Global Diversity and Inclusion or EEO Investigations.*

Audit Committee: *Employees may transmit concerns about accounting, internal controls or auditing matters and confidential or anonymous submission of questionable accounting or auditing matters to the Audit Committee of the Lockheed Martin Board of Directors. If you wish to raise a concern to the Audit Committee, you may do so by contacting the Corporate Ethics Office and your concern will be communicated to the Chair of the Audit Committee of the Board.*

1-800-LM ETHIC (1-800-563-8442)

For the Hearing or Speech Impaired:
1-800-441-7457

Internationally: when calling from outside the U.S., first dial the origin country's exit code

Email:

corporate.ethics@lmco.com

Mail:

Corporate Ethics Office
Lockheed Martin Corporation
6801 Rockledge Drive
Bethesda, MD 20817



You can report suspected violations or questionable conduct to:

- Your Supervisor • Human Resources • Ethics • Legal • Security
- EEO Investigations • Environment, Safety and Health
- Global Diversity and Inclusion • Internal Audit • [Audit Committee](#)

And you can always call Ethics for guidance on any workplace issue. You'll receive information and resources to help address your concern.

We Participate in Training

WE SET THE STANDARD

- We learn to live our values through discussion of real-life scenarios based on workplace violations.
- We complete all required training by the due date, including compliance training and annual Ethics Awareness Training.

Why It Matters

- Training prepares us to recognize and effectively react to situations requiring ethical decision making.
- Training addresses the consequences of compliance violations for both Lockheed Martin and individual employees.
- Training helps improve our understanding of topics in this Code and their application in practice.

What to Watch Out For

- Be sure to complete your required training on time.

Key Policies

- CPS-001 Ethics and Business Conduct

“ Ethics is knowing the difference between what you have the right to do and what is right to do.” ”

Justice Potter Stewart



We Take Action

WE SET THE STANDARD

- We act with integrity, ask tough questions and understand how our words and actions affect our colleagues and the Corporation.
- We take action to address values conflicts and potential violations of law or policy when they arise.
- We encourage one another to talk to leadership or other appropriate personnel when in doubt about the best course of action.
- We use the Voicing Our Values techniques to put our values into practice.

Why It Matters

- For the Corporation to maintain a high level of organizational integrity, we each must be willing to take action.
- Challenges to our values may be a normal occurrence in the work environment, but they must be resolved.

What to Watch Out For

- Warning signs help us identify and correct potential problems before they become larger issues.
- Assumptions and inferences can impact our impartiality and hinder ethical decision-making.

Key Policies

- CPS-001 Ethics and Business Conduct
- CPS-718 Disclosures to the United States Government
- CRX-021 Internal Investigations

Voicing Our Values Techniques



ASK QUESTIONS

Check Your Motivations

- Why do I feel I'm right?
- What kind of questions should I ask, and of whom?
- What about this situation is bothering me?
- Am I asking questions to get information, or to drive home my point?



TALK TO OTHERS

Get Outside Your Own Head

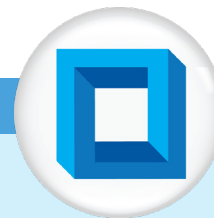
- Who can I talk to about what I'm going through?
- How can I practice my approach?
- What objections will I likely encounter and how should I best respond?



OBTAIN DATA

Check Your Facts

- Do I have all the relevant information I need?
- Could I be jumping to conclusions?
- What data would be most impactful to my intended audience?
- How do I know what is objective fact and what are subjective assumptions?



REFRAME THE ISSUE

See the Bigger Picture

- What are the things we can all agree on?
- What approach will bring the best outcome for all parties?

WE RESPECT OTHERS

Respect is an essential element of all positive and productive business relationships.

- We Have Zero Tolerance for Harassment
- We Have Zero Tolerance for Discrimination
- We Have Zero Tolerance for Retaliation
- We Respect Privacy



We Have Zero Tolerance for Harassment

WE SET THE STANDARD

- Lockheed Martin prohibits verbal or physical conduct that offends, abuses, intimidates, torments, degrades or threatens another person.
- We are committed to maintaining a work environment that is free of physical, psychological, and verbal harassment or other abusive conduct.

Why It Matters

- Our success depends on the talent, skills and expertise of our people and our ability to function as a tightly integrated team.
- Targets as well as witnesses of harassment may struggle to contribute to their full potential.

What to Watch Out For

- Examples of prohibited conduct include unwelcome touching, assault, impeding or blocking movements; accessing, transmitting, or displaying offensive messages, images, or cartoons; making or using derogatory comments, epithets, slurs, jokes, or objects; and sexual harassment in any form.
- Be mindful of your own behavior and how your actions, words and deeds could impact someone else.
- Harassment can occur in all forms of electronic communication, in online collaboration tools, and outside the workplace.



- Our policies apply to any external communication which may be connected to Lockheed Martin. These policies also govern conduct in any place where we, as Lockheed Martin employees, perform work, as well as off-premises situations that are connected to work.

Key Policies

- CPS-003 Nondiscrimination and Equal Employment Opportunity
- CPS-564 Harassment-Free Workplace
- CPS-734 Combating Trafficking in Persons
- CRX-053 Workplace Security - Maintaining a Safe and Respectful Workplace Free from Threats and Violence

EXAMPLES OF SEXUAL HARASSMENT INCLUDE:

- unwanted sexual advances, including verbal sexual advances and propositions
- offering employment benefits in exchange for sexual favors
- making or threatening reprisals after a negative response to sexual advances
- leering, making sexual gestures
- displaying pornographic or sexually suggestive objects or pictures, cartoons, or posters
- using inappropriate terms of endearment
- verbal abuse of a sexual nature
- graphic verbal commentaries about an individual's body
- sexually degrading words used to describe an individual
- suggestive or obscene letters, notes, or invitations



At Lockheed Martin, there is no such thing as an uninvolved bystander.

We Have Zero Tolerance for Discrimination

WE SET THE STANDARD

- We do not discriminate against employees or applicants on the basis of characteristics protected by applicable law or Lockheed Martin policy.
- We follow all policies and laws that relate to recruitment, selection, and other aspects of employment such as promotion, demotion, transfer, layoff, termination, compensation, education, training and disciplinary action.

Why It Matters

- When the diverse talents and perspectives of all employees are fully embraced and leveraged, we power innovative solutions and unparalleled value for our customers. That won't happen if individuals are excluded simply by virtue of who they are.

What to Watch Out For

- Perpetuating stereotypes is a form of discrimination that can damage the culture and the performance of the Corporation.

Key Policies

- CPS-003 Nondiscrimination and Equal Employment Opportunity
- CPS-564 Harassment-Free Workplace
- CPS-734 Combating Trafficking in Persons
- CRX-515 Business Resource Groups and Employee Networks
- CRX-537 Military Leave



PROTECTED CHARACTERISTICS *(Visit the internal Global Diversity & Inclusion website for current definitions)*

Race

Ethnicity

Religion

Color

Sex

Pregnancy

Age

Veteran
Status

Ancestry

Sexual
OrientationGender
Identity or
ExpressionMarital
StatusFamily
StructureGenetic
InformationMental or
Physical
DisabilityAny
Other Legally
Protected
Characteristic

We Have Zero Tolerance for Retaliation

WE SET THE STANDARD

Lockheed Martin does not tolerate retaliation against anyone who, in good faith, makes an inquiry, participates in an investigation or reports misconduct.

Why It Matters

- Fear of retaliation is one of the most common reasons why employees won't speak up or take action.
- Retaliation destroys trust.

What to Watch Out For

- If someone tries to stop you from reporting an issue, that person can be subject to disciplinary action up to and including termination.
- Retaliation can be subtle, such as changes in work assignments or occurring in casual work-related interactions (e.g., coffee or lunch breaks). You are legally **protected** from reprisals for reporting fraud, waste or abuse on government programs.

Key Policies

- CPS-001 Ethics and Business Conduct
- CPS-003 Nondiscrimination and Equal Employment Opportunity
- CPS-564 Harassment-Free Workplace
- CPS-575 Providing Reasonable Accommodations in the Workplace and for Applicants

“The potential beauty of human life is constantly made ugly by man's ever-recurring song of retaliation.”

Martin Luther King, Jr.

Did you know?

Contacting Ethics in “Good Faith” does not mean you have to be right, but it does mean you believe the information provided is truthful.



Protected: U.S. law also entitles each Lockheed Martin employee to certain rights and protections against reprisals if the employee discloses, to certain governmental officials or to the Legal Department or Ethics Office, information that the employee reasonably believes is evidence of gross waste, mismanagement, abuse of authority, or violations of law related to U.S. government contracts, grants, or funds; or evidence of a substantial and specific danger to public health and safety.

Retaliation is the unfair or inappropriate treatment against an employee for reporting misconduct, filing a complaint, assisting another in making a complaint, participating in a company internal investigation, or making an ethics-related inquiry.

We Respect Privacy

WE SET THE STANDARD

- We do not access Personal Information / Personal Data unless there is a legitimate business purpose and we have proper authorization.
- We respect the privacy and dignity of all individuals and safeguard the confidentiality of employee records and information.
- We only send Personal Information / Personal Data externally using approved secure e-mail and file transfer methods.

Why It Matters

- Respect for privacy generates trust among employees and customers.

What to Watch Out For

- Privacy protections differ by country.
- Be sure to use the appropriate Personal Information / Personal Data legend in the subject line of email messages.
- Ensure that you do not share Personal Information / Personal Data on social media or collaborative workspaces.
- Data disclosed to third parties should be limited to only the information necessary to fulfill contractual agreements.

Key Policies

- CRX-015 Protection of Sensitive Information
- CRX-016 Privacy - United States
- CRX-017 Personal Data Protection - Non-U.S

PERSONAL INFORMATION

In the U.S., Personal Information is any data or information that specifically identifies a person.

Examples include government-issued identification and financial, medical, health, demographic or personal contact information.

PERSONAL DATA

Outside the U.S., Personal Data is any information relating to an identified or identifiable data subject.

A data subject is anyone (including but not limited to a Lockheed Martin employee, supplier, customer, or other contact) who is located in a country other than the U.S. regardless of his or her nationality, the reason for being in the non-U.S. location, or the duration of stay.



WE DEMONSTRATE ACCOUNTABILITY

We are committed to the highest standards of ethical conduct in all that we do.

- We Use Assets Responsibly
- We Keep Accurate Business Records and Communicate Accurately to the Public
- We Protect Sensitive and Classified Information
- We Accurately Charge Labor and Other Costs
- We Avoid Individual Conflicts of Interest
- We Avoid Conflicts of Interest with Government Employees
- We Avoid Organizational Conflicts of Interest
- We Do Not Engage in Insider Trading
- We Use Artificial Intelligence Responsibly



We Use Assets Responsibly

WE SET THE STANDARD

- We are responsible for properly using and protecting our Corporation's, and our customers', **property** and assets, and ensuring their efficient use.
- We neither waste nor abuse company and customer assets.

Why It Matters

- Our customers expect us to protect resources that they entrust to us.
- Unauthorized use of company assets, as well as third-party information entrusted to the Corporation, can create risks to the Corporation and impact our financial obligations.
- Improper use of assets could result in violations of law and failure to meet contractual obligations and / or deviations from company policies; all of which can have unintended impacts to the corporation and individuals.

What to Watch Out For

- An employee's misuse of U.S. Government assets can constitute a federal crime.
- Activities of concern include:
 - Using customer assets for anything other than as specifically contractually allowed/authorized.
 - Sending/storing/handling sensitive information on a personal computing device.
 - Sending company information to personal email addresses.
 - Using unapproved electronic items such as memory sticks to store data in company / customer assets.
 - Personal use of company assets.
 - Personal use of your corporate credit card.



■ We must maintain assets with care, guard against waste and abuse and never borrow or remove them from corporate or customer property without permission. ■

Property: This includes electronic communication systems, information resources, materials, facilities and equipment.

Key Policies

- CPS-007 Personal Use of Lockheed Martin Assets
- CPS-037 Proper Use of Computing and Information Resources
- CRX-014 Individual Conflict of Interest
- CRX-156 Purchasing Cards (P-Cards)
- CRX-253 Social Media
- CRX-303 Electronic Messaging
- CRX-325 Business Travel
- CRX-327 Commercial Cards
- TVL-001 Business Travel Handbook

We Keep Accurate Business Records and Communicate Accurately to the Public

WE SET THE STANDARD

- We honestly and accurately prepare all business and financial records.
- We conduct business transparently while not compromising proprietary or confidential information.
- We never misrepresent facts or falsify records.
- We promptly and accurately enter all business transactions in our books and business records.
- We have an obligation to the public and our stockholders to make accurate public disclosures.

Why It Matters

- Our customers and investors expect us to maintain the integrity of our records.
- Our complex business processes demand that each of us be able to rely on the accuracy of the data we provide each other to serve our customers.
- Keeping accurate records is critical to accurately recording and reporting financial transactions and meeting our legal and regulatory obligations as a public company.
- Investor and public trust and confidence are important, and our investors rely on accurate **public disclosures**.

What to Watch Out For

- Your inputs matter. Every business record you provide helps us provide accurate disclosures to all government and regulatory agencies.
- Be mindful of any proprietary or confidential information included in any type of public disclosure, including external communications.
- You must properly account for all costs, including labor, travel, material and any other expenses.
- If you prepare business or financial records or public communications on behalf of the Corporation, you must ensure that all information they contain is comprehensive, fair, timely, accurate and understandable.

These activities not only violate policy, but may also be illegal:

- Inaccurate pricing information submitted in proposals.
- Inaccurate reporting of business travel expenses.
- Inaccurate labor charging.

Key Policies

- CPS-011 Internal Control and Enterprise Risk Management
- CPS-020 Fair Disclosure of Material Information and Financial Information to the Investment Community and Public
- CPS-201 Release of Information
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-011 International Business Development Consultants

Public disclosures: include reports or documents filed with the U.S. Securities and Exchange Commission and other regulatory authorities as well as other public communications made by the Corporation, including external presentations.



Did you know?

YOUR business records are OUR business records and the U.S. Federal Acquisition Regulatory Council monitors our reporting requirements as a defense contractor.

We Protect Sensitive and Classified Information

WE SET THE STANDARD

- We use, store and protect **Sensitive Information** in accordance with applicable requirements.
- We obtain proper authorization before disclosing or receiving any Sensitive Information.
- We ensure that all recipients of classified information, including ourselves, have the proper security clearance and “need to know.”
- We use social media responsibly and are conscious not to share sensitive information in unapproved forums.

Why It Matters

- We generate, acquire, and access large amounts of valuable information every day. This information provides us and our customers with business, technological, and economic advantages. In some cases, it also impacts national security interests.
- Even a single incident of mishandling information can damage our reputation, and that of our customers, partners and the countries we call home.

What to Watch Out For

- Make sure you obtain **proper approval** before publishing or making external presentations about Lockheed Martin or its customers or partners.
- Wherever we do business there are country-specific laws and regulations governing import/export issues and unique information handling and safeguarding requirements.

- When using social media, take extra care to protect information about the Corporation, your colleagues, customers and yourself.
- Information protection requirements stay in effect even after your employment or engagement with the Corporation ends.

Key Policies

- CPS-201 Release of Information
- CPS-310 International Trade Controls and Compliance
- CPS-569 Security
- CRX-002 Intellectual Property
- CRX-013 Government and Competitor Information
- CRX-015 Protection of Sensitive Information
- CRX-016 Privacy - United States
- CRX-017 Personal Data Protection - Non-U.S.
- CRX-253 Social Media
- CRX-303 Electronic Messaging

Data Security starts with us.
We should understand the sensitivity of the data we work with and our role in keeping it safe.

Sensitive Information: Information in any or all of these categories: Personal Information (U.S.), Personal Data (Non-U.S.), Export Controlled Information, Lockheed Martin Proprietary Information, and Third-Party Proprietary Information.

Proper Approval: U.S. employees should visit the PIRA tool (Public Information Release Information Tool (<https://pira.us.lmco.com/pira/>)). Non-U.S. employees should contact Communications for the appropriate point of contact to review their materials.



We encounter Sensitive Information at our facilities or customer locations, working from home or in public locations when working remotely. No matter where you are working at any given time, remember to stop and think when handling Sensitive Information.

We Accurately Charge Labor and Other Costs

WE SET THE STANDARD

- We follow the business-specific labor recording policies and procedures wherever we work.
- We properly account for all costs including labor, travel, material and other costs.

Why It Matters

- Improperly charging time on customer contracts could be considered fraud.

What to Watch Out For

- You will be held accountable for ensuring that your labor charges are accurate and that you are recording your time properly.
- Excessive use of online collaboration tools and the internet for non-work purposes could lead to labor mischarging.
- These actions not only violate policy, but also may be illegal:
 - Mischarging or falsifying timekeeping records
 - Incorrectly charging an account or cost objective
 - Approving mischarging
 - Shifting **costs** to improper accounts



Small things matter; be mindful of how much time you spend on non-work activity and account for it appropriately.

Key Policies

- CMS-505 Recording and Verification of Direct Labor Costs
- CPS-011 Internal Control and Enterprise Risk Management
- CPS-441 Cost Estimating/Pricing
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-325 Business Travel
- CRX-327 Commercial Cards

Did you know?

The violation of labor charging practices is one of the most frequent ethics case allegations at Lockheed Martin.

Costs: These costs include, but are not limited to, normal contract work, work related to normal contract research and development and bid and proposal activities. This means that transactions between the Corporation and outside individuals and the organizations are accounted for and executed in accordance with generally accepted accounting practices and principles in the United States, and in the countries where we do business.



We Avoid Individual Conflicts of Interest

WE SET THE STANDARD


- We are fair and impartial in our business dealings.
- We place the interest of Lockheed Martin over personal interests in matters relating to the Corporation's business.
- We avoid actual conflicts of interest as well as activities that create the appearance of one.
- We do not use our contacts or position in the Corporation to advance outside or personal interests.
- We do not use our Corporation's property, information or opportunities for personal gain.
- We provide written disclosure of actual or potential conflicts of interest as soon as we become aware of them.

Why It Matters


- It's human nature to think we can balance multiple interests at the same time. We may not realize when our loyalties may be divided. That's why we focus on disclosing even potential conflicts of interest - so we can get an independent, objective assessment and take appropriate mitigating action.


Conflict of Interest Network


Welcome to the Conflict of Interest Network (COIN) Tool



Disclose a COI



Help & Guidance
(CRX-014)

Key Policies

- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-011 International Business Development Consultants
- CRX-013 Government and Competitor Information
- CRX-014 Individual Conflict of Interest

Our Conflict of Interest policy covers many situations, including:

- Owning or having a substantial interest in a company that is a customer, competitor or a supplier.
- Doing business with a firm owned or controlled by a Lockheed Martin employee or their family.
- Family relationships with persons employed by a supplier or competitor.
- Accepting gifts, payments or services from those seeking to do business with Lockheed Martin.
- Outside business interests.
- Acting as an independent consultant to a Lockheed Martin customer or supplier.
- Using assets for personal gain.
- Having a close, personal relationship with a subordinate employee.

We Avoid Conflicts of Interest with Government Employees

WE SET THE STANDARD

- We avoid conflicts of interest in connection with employing or acquiring the services of current or former government employees, which includes military personnel.
- We comply with all laws and regulations covering employing or acquiring the services of government employees.

Why It Matters

- Our continued success and ability to compete in the marketplace depend on ensuring that we do not hire or work with current or former government employees in a manner that creates a real or perceived conflict of interest.
- The nature of the information and the competitive advantage and / or detail of information that the individual possesses may itself create a conflict.

What to Watch Out For

The rules regarding government employees:

- Apply to contacting or negotiating with current government employees to discuss their potential future employment by the Corporation or their service as consultants or subcontractors.
- May restrict the roles and responsibilities that former government employees may perform on behalf of the Corporation.
- Can be complex. Don't hesitate to seek advice from Legal or your Human Resources Department.



Key Policies

- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CRX-014A Conflict of Interest - Government Employment

*NOTE: U.S. Government employees should have their government ethics official **review their background** before applying for work.*

Review their background: U.S. Government employees should have their government ethics official review their background before applying for work. This process may result in a recusal letter (also called a disqualification letter) and an ethics opinion letter which would explain any restrictions or bans on their potential post-government employment. Before interviewing for a position, Lockheed Martin requires applicants to complete a conflict of interest form for review by Legal.

We Avoid Organizational Conflicts of Interest

WE SET THE STANDARD

- We actively work to avoid, neutralize, or mitigate Organizational Conflicts of Interest (OCI).
- We seek to prevent unfair competitive advantage or conflicting roles that might impair our objectivity.

Why It Matters

- We are in a unique business where we provide products and services to a limited number of government customers. Many employees have worked with multiple customer representatives across different programs.
- A conflict on one government contract could compromise our ability to work successfully on another.
- Failure to properly screen new business opportunities could result in disqualification or loss of the opportunity.
- Our policies are intended to prevent both unfair competitive advantage and conflicting roles that might bias the Corporation's judgment.



What to Watch Out For

- Be sure to **report** and maintain the disclosure of any OCI restrictions and notify your supervisors and prospective supervisors of any OCI restrictions.

Key Policies

- CRX-014E People with Organizational Conflict of Interest Restrictions
- CRX-600 Organizational Conflict of Interest

Report: Visit CRX-600 for the process regarding preparing a screening letter and distributing it through the OCI Reporting System.

What is an OCI?

An organizational conflict of interest may exist if, because of other activities or relationships, we are unable to render impartial assistance or advice to the government, or our objectivity in performing the contract is or may be impaired, or we may have gained an unfair competitive advantage.

We Do Not Engage in Insider Trading

WE SET THE STANDARD

- We not only comply with all applicable securities laws, we avoid even the appearance of impropriety.
- When in possession of material, nonpublic information about Lockheed Martin or another company:
 - We do not trade Lockheed Martin's, or the other company's, securities
 - We do not share or "tip" such information to anyone else
 - We do not suggest to someone else that they should trade in Lockheed Martin's, or the other company's, securities, even if we do not share the underlying information

Why It Matters

- Our investors' trust in us and the public's trust in financial markets depend on confidence that trades in securities are based on publicly available information.

What to Watch Out For

- Each of the terms "**securities**," "**trading**," "**material**" and "**nonpublic**" have extensive and complicated legal definitions. Contact the Legal Department if you have a question about whether something is material nonpublic information or a question on trading securities.
- If in your work you learn of important information related to Lockheed Martin or a third party before the general public knows, there's a possibility it could be considered material nonpublic information. Communicating such information to others may violate the law, even if you personally do not trade any securities based on such information.

Key Policies

- CPS-016 Mergers, Acquisitions, Divestitures, Business Ventures, and Investments
- CPS-020 Fair Disclosure of Material Information and Financial Information to the Investment Community and Public
- CPS-722 Compliance with United States Securities Laws

Securities: Securities include stock (common and preferred), restricted stock units, employee stock options, bonds, notes, debentures, put or call options, or similar instruments.

Trading: Trading includes all transactions in securities, including fund transfers or fund reallocations into or out of the Lockheed Martin stock fund in your savings, benefit or deferred compensation plans; any purchase or sale of common stock (including the sale of shares received from vested restricted stock units); gifts of Lockheed Martin securities if the value of the gift is established for tax purposes at the time the gift is made; and the exercise of employee stock options. It also includes trades executed pursuant to limit orders, even if these were placed prior to your coming into possession of material, nonpublic information.

Material: Information is "material" if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to trade a security. Both positive and negative information can be "material."



Nonpublic: Information is considered "nonpublic" until it is widely disseminated. This means it has been in the news or released in the form of an official announcement and enough time has passed in the open market, privately or in company plans for the information to be assimilated by the general public (typically the next business day).

All of us, whether or not we own Lockheed Martin stock, should be aware of Insider Trading because we could still tip others, or trade in the stock of other companies, based on information learned at work.

We Use Artificial Intelligence Responsibly

WE SET THE STANDARD

We are committed to pursuing the benefits of Artificial Intelligence (AI) while ensuring procurement, development and our internal use are in accordance with our values.

Why It Matters

- We recognize that AI holds tremendous potential benefits for our customers and our operations,

and we intend to be an industry leader in this revolutionary technology.

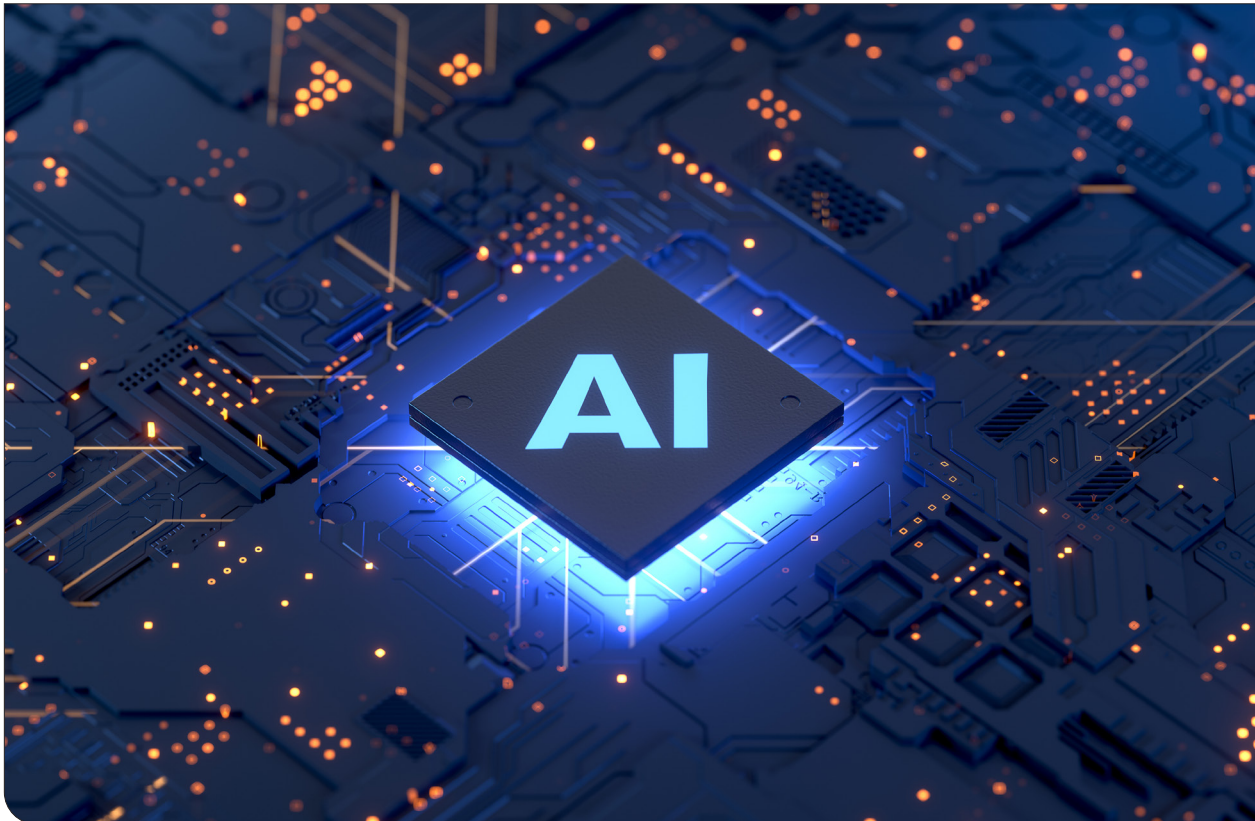
- Access to tremendously valuable data and high-performance computing has unleashed unprecedented opportunities in AI that are changing the way companies operate in all industry sectors.
- We understand that, as a rapidly evolving discipline, there may be risks that must be considered and addressed in the design and implementation of AI systems.

What to Watch Out For

- If you are involved in the development, procurement, deployment or internal use of AI systems, ensure you are familiar with the principles and concepts outlined in *CPS-022, Ethical Development and Use of Artificial Intelligence*.

Key Policies

- CPS-022 Ethical Development and Use of Artificial Intelligence



Did you know?

Lockheed Martin was one of the first defense leaders to align with the U.S. Department of Defense guidance on the Ethical Use of Artificial Intelligence.

WE CONDUCT BUSINESS FAIRLY

We understand the importance of our missions and the trust our customers place in us.

- We Value Fair Competition
- We Respect Trade Guidelines
- We are Accountable for the Actions of Third Parties
- We Have Zero Tolerance for Corruption and Kickbacks
- We Strictly Adhere to all Antitrust Laws
- We Accept and Provide Only Appropriate Business Courtesies



We Value Fair Competition

WE SET THE STANDARD

- We are fair in our dealings with customers, suppliers, **competitors** and employees.
- We ensure all communications and representations to prospective customers, suppliers and partners are accurate and truthful.
- We perform all contracts in compliance with laws, specifications, requirements, and contract terms and conditions.
- We never request, accept, use, copy or distribute any information to which Lockheed Martin is not **legitimately entitled**.

Why It Matters

- Maintaining the highest standards of integrity in our procurement processes, and in bidding or negotiating contracts, is essential to performing on current and future contacts, products and services.

What to Watch Out For

- These activities not only violate policy, but also may be illegal:
 - Discussing, using, copying or distributing any unauthorized information (especially pricing, bid strategy or customer information obtained during bids or negotiations or in connection with attendance at trade shows, industry groups or training) without seeking guidance from the legal department or ethics office
 - Discussion or agreement with competitors or partners to allocate bids, contracts, customers, markets or territories, or coordinate pricing or limit supply of products or services
- Report any inquiries made to us in connection with our bid or negotiation activities to the Legal Department.



Key Policies

- CPS-009 New Business Opportunity Management
- CPS-441 Cost Estimating/Pricing
- CPS-729 Compliance with United States Antiboycott Laws
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-011 International Business Development Consultants
- CRX-013 Government and Competitor Information
- CRX-015 Protection of Sensitive Information

Competitors: In some situations, other Lockheed Martin business units may also be a competitor.

Legitimately entitled: If you receive unauthorized information, or if you are uncertain as to the Corporation's legal right to use or share the information, do not copy, distribute or use it.

Did you know?

Government prosecutors may not have to prove that price-fixing or bid-rigging was part of a formal written or expressed agreement. Circumstantial evidence, such as suspicious bid patterns or travel and expense reports can be enough to prosecute.

We Respect Trade Guidelines

WE SET THE STANDARD

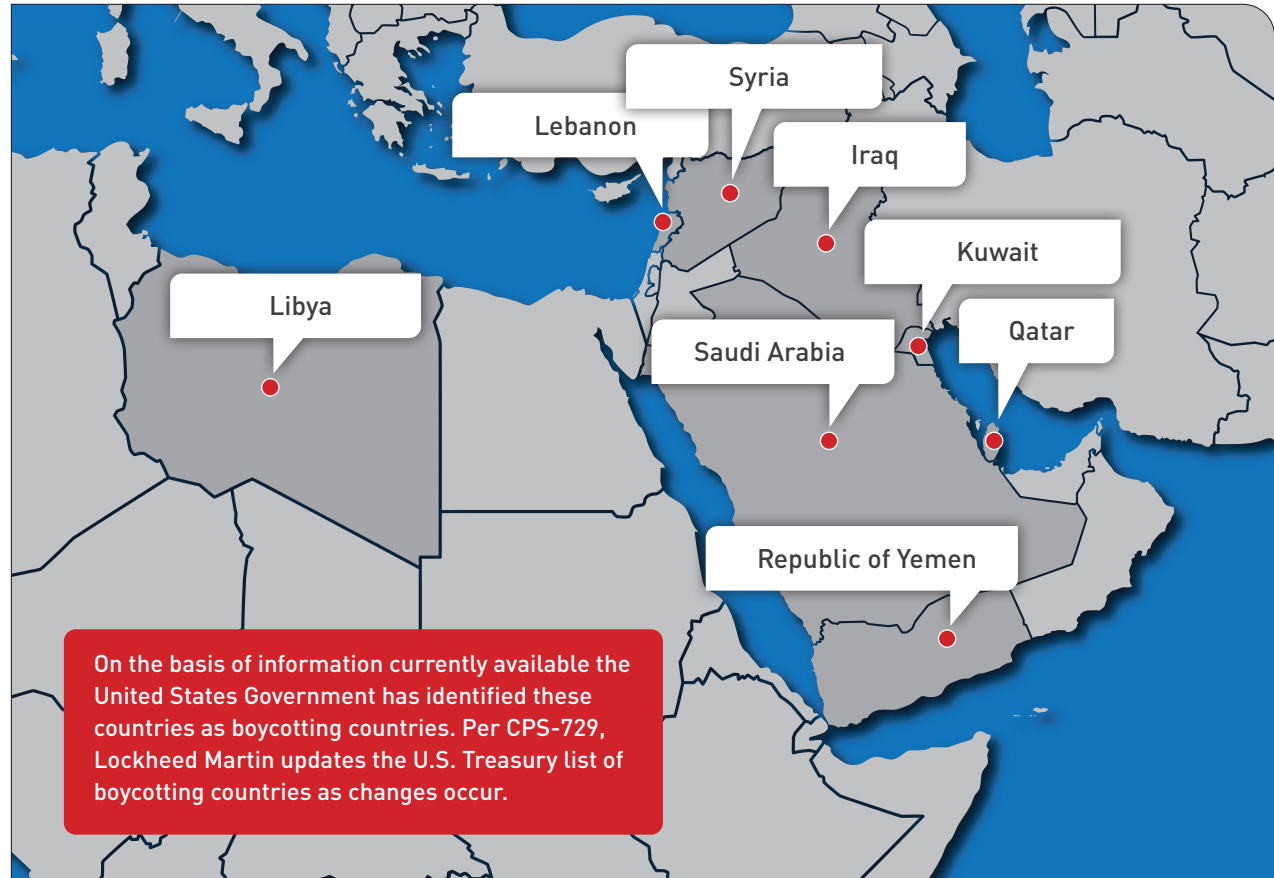
- We comply with all export and import laws and regulations that cover the transfer of certain technical data, equipment and technology between countries.
- We do not engage in or support restrictive international trade practices or boycotts not sanctioned by the U.S. Government.
- We comply with both the U.S. law and the laws of the countries where we do business.

Why It Matters

- Export and import violations, and illegal boycotts, damage the trust and transparency needed to transact legitimate and long-term business.
- Our customers expect fair and open competition in how we do business worldwide with our competitors, suppliers and customers.

What to Watch Out For

- Any **written or oral** request in bids and proposals to comply with boycotts not sanctioned by the U.S. Government is a boycott red flag and must be immediately reported to your Element Legal Counsel, even if Lockheed Martin decides not to proceed with the bid / proposal.
- These restrictions can include sanctions or embargoes that prohibit Lockheed Martin from engaging in certain business activities in specified countries, as well as with specified individuals and entities. For example, U.S. law prohibits interaction with identified terrorist states and organizations.



Key Policies

- CPS-729 Compliance with United States Antiboycott Laws
- CRX-015 Protection of Sensitive Information
- CPS-310 International Trade Controls and Compliance

INTERNATIONAL TRADE LAWS AND REGULATIONS ARE COMPLEX. BE CAREFUL TO AVOID EVEN INADVERTENT VIOLATIONS.

Written or oral: This includes explicit or more subtle contract language such as, "The Seller agrees to fully comply with the Israeli Boycott rules and certifies that the equipment to be supplied under this contract will not be of Israeli origin..." or, "The Seller's specialists shall abide by all rules and laws with Country X."

We are Accountable for the Actions of Third Parties

WE SET THE STANDARD

- We do not engage with third parties to conduct business in a manner that is contrary to law or to our policies or that would circumvent our values and principles.
- We provide training to certain third parties on our ethical values, policies and compliance requirements.

Why It Matters

- The actions of third parties who conduct business on our behalf can impact our reputation.
- Improper actions conducted on our behalf could result in criminal or civil liability for the Corporation or for the employee(s) responsible for the third party.
- We may be accountable for the actions of anyone conducting business on our behalf.

What to Watch Out For

- Be certain that all third parties, including business development consultants and independent contractors, understand their obligations to act in compliance with applicable laws and regulations.
- Ensure that third parties representing or acting on behalf of the Corporation are, at all times, acting in compliance with the Corporation's requirements for doing business on its behalf.
- Be certain that consultants, representatives and third parties certify that they will comply, and are acting in compliance with, the Corporation's requirements for doing business on its behalf.



- Ensure that third parties are trained and clear about their responsibilities, actions and adherence to our policies.

Key Policies

- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CPS-113 Acquisition of Goods and Services
- CPS-716 Compliance with the Anti-Kickback Act of 1986
- CPS-730 Compliance with Anti-Corruption Laws
- CPS-734 Combating Trafficking in Persons

- CRX-010 U.S. Business Development Consultants
- CRX-011 International Business Development Consultants
- CRX-025 Teaming Agreements
- CRX-106 Managing Major Subcontracts
- CRX-126 Counterfeit Prevention

**WE MAY BE ACCOUNTABLE FOR THE
ACTIONS OF ANYONE CONDUCTING
BUSINESS ON OUR BEHALF**

We have Zero Tolerance for Corruption and Kickbacks

WE SET THE STANDARD

- We have zero tolerance for **bribery** and **corruption**.
- We do not offer, give, solicit or receive any form of bribe or **kickback**.
- We walk away from any business engagement that would violate any anti-corruption law or our Code of Conduct, or that would create even a perception of impropriety.

Why It Matters

- Corruption creates unfair competition, increases cost and jeopardizes the quality and capability of our products and services.
- Bribery, including even the attempt to corrupt, is illegal and may be enough to be prosecuted under U.S. and other countries' laws.
- Conducting business where there is even a hint of impropriety could cause irreparable reputational and legal harm to our business, in addition to significant financial penalties and debarment.

What to Watch Out For

- A party's poor reputation, ties to government and public officials, questionable or unusual circumstances, unusual compensation and questionable accounting or invoicing, or insufficient capabilities are **red flags**.
- Expressions such as; 'that's the way business is done here', 'everyone does it', 'that is what is expected to win the contract', or 'this is normal in this country' are also red flags.
- Report any red flag to Legal.

Key Policies

- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CPS-021 Good Corporate Citizenship and Respect for Human Rights
- CPS-310 International Trade Controls and Compliance
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-011 International Business Development Consultants
- CRX-015 Protection of Sensitive Information



Bribery: Bribery is directly or indirectly paying, promising, giving, offering or authorizing to give anything of value to anyone for the purpose of influencing that person to misuse his or her position.

Corruption: Corruption is any unlawful, illegitimate or improper behavior intended to gain an advantage and includes bribery, fraud, extortion, theft, abuse of power and money laundering.

Kickback: A kickback is any money, fee, commission, credit, gift, gratuity, thing of value, loan, entertainment, service or compensation of any kind that is provided, directly or indirectly, to any prime contractor, prime contractor employee, subcontractor or subcontractor employee for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract with the U.S., or a subcontract in connection with a prime contract with the U.S.

Red flags: A "red flag" is a fact, event, or set of circumstances, or other information that may indicate a potential legal compliance concern for illegal or unethical business conduct, particularly with regard to corrupt practices and non-compliance with anti-corruption laws.

We Strictly Adhere to all Antitrust Laws

WE SET THE STANDARD

- We do not knowingly enter into business arrangements that eliminate or discourage competition or that give us an improper competitive advantage.

Why It Matters

- Antitrust laws apply world-wide and protect trade and commerce from unlawful restraints and monopolies, or unfair business practices, protecting both Lockheed Martin and our business partners.

What to Watch Out For

- If you are unsure whether a proposed activity complies with the antitrust laws, consult in advance with your Legal department.

Key Policies

- CPS-720 Compliance with the Antitrust Laws



Antitrust rules apply to more than you might think. They require that you avoid engaging in certain activities and business discussions. Examples from the policy include:

- Price fixing
- Boycotting suppliers or customers
- Pricing intended to run a competitor out of business
- Disparaging, misrepresenting or harassing a competitor
- Teaming with companies to create less competitive outcomes for customers or blocking competitors to prevent market entry
- Bribery, kickbacks or stealing trade secrets
- Entering into agreements with competitors to divide the market by allocating bids, contracts, territories or markets or restricting the production or sale of products or product lines
- Conditioning the sale of one product or service on the sale of another product or service
- Conditioning the sale or purchase of products or services on the requirement that the seller or purchaser not do business with competitors of the Corporation

We Accept and Provide Only Appropriate Business Courtesies

WE SET THE STANDARD

- We avoid even the perception that favorable treatment is being sought, received or given in exchange for business courtesies.
- We ensure that any business courtesy offered or accepted is permitted by law and policy.

Why It Matters

- When people exchange gifts or **business courtesies**, it can create the perception that favors were granted in order to improperly influence business judgment.
- We compete on the merits of our products and services and do not give business courtesies to gain an unfair competitive advantage.
- We source products and services fairly and avoid accepting business courtesies that may cause even the perception of an inappropriate business relationship.

What to Watch Out For

- Complex rules and monetary limits apply when dealing with **Public Officials**. Consult policy and obtain guidance from Ethics if you are uncertain if an action is inappropriate or within the allowable limits.
- The Corporation has established specific guidelines for each country where we do business.
- It is not only the value of the business courtesy that matters. The simple act of offering, giving or receiving any business courtesy, or the perception of an intent to gain an improper business advantage, may be illegal or unethical.
- Some gift limit rules are calculated within a calendar year and others depend on the fair market value of the courtesy being offered or received.

- More restrictive rules regarding acceptance of business courtesies apply to employees who work in Supply Chain Management or are involved in the process of directing business or funds to our business relations.

Key Policies

- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CPS-716 Compliance with the Anti-Kickback Act of 1986
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-011 International Business Development Consultants

Business Courtesies: A business courtesy is any tangible or intangible thing of value for which fair market value is not paid by the recipient.

Public Officials: A public person who is, regardless of position, paid or unpaid, any of the following:

- An officer or employee of any government, department, agency, bureau, authority, or government-owned instrumentality, such as a state-owned or state-controlled entity;
- Acting in an official capacity for or on behalf of any government, department, agency, bureau, authority, or instrumentality;
- An official, employee, or person acting on behalf of a government-sponsored or public international organization such as the United Nations, World Bank, or the European Community;
- Holding a legislative, administrative, executive, or judicial position, whether appointed or elected;



GIFTS DECISION TREE

The Gifts Decision Tree is a tool to assist you when making decisions about actions that may involve gifts, hospitality, other business courtesies and sponsorships.



- A political candidate, or an officer or employee of a political party;
- A member of a Royal Family; or
- A family member of or otherwise closely associated with any of the foregoing.

WE CARE ABOUT OUR WORK ENVIRONMENT

Our success as an enterprise depends on the talent, skills and expertise of our people and our ability to function as a tightly integrated team.

- We Maintain a Safe and Healthy Work Environment
- We Maintain a Drug-Free Workplace
- We are Committed to Security



We Maintain a Safe and Healthy Work Environment

WE SET THE STANDARD

- We are committed to providing a safe and healthy work environment.
- We are committed to operating in a manner that protects the environment, conserves natural resources and prevents pollution.
- We strive for a speak up culture where we encourage anyone to call a STOP if they identify something that is unsafe or can harm the environment.

Why It Matters

- Many of us spend more time at work than we do at home. We need to trust that our workplace is safe and that the company cares for our welfare and our environment.

What to Watch Out For

- Report any violations of posted warnings, procedures and regulations.
- Report immediately to the appropriate management any accident or injury sustained on the job, or any environmental, safety or health concern you may have.

Key Policies

- CPS-015 Environment, Safety and Health (ESH)
- CRX-053 Workplace Security - Maintaining a Safe and Respectful Workplace Free from Threats and Violence



“ It is a MYTH that accidents just happen – Research shows that over 99% of all accidents are preventable. If you think that accidents just happen, then what allows you to drive down the road, walk down the sidewalk or even live in your home without great fear? The reality is that you have a great deal of control over the circumstances around you. ”

EHS Today - Carl Potter, CSP

ZERO IN ON SAFETY



IDEA:

- **ID (Identify):** assess the situation to identify safety risk
- **E (Evaluate):** determine the best course of action to address the risk

- **A (Act):** communicate or report your safety concerns to colleagues and your leader, and mitigate the risk

We Maintain a Drug-Free Workplace

WE SET THE STANDARD

- Lockheed Martin will not knowingly hire or rehire individuals who possess, use, sell, manufacture, transfer, or traffic in illegal drugs.
- We prohibit possession, use, sale, manufacture, transfer, trafficking in, or being under the influence of illegal drugs, or the abusive use of legal drugs, in the workplace or in the performance of company business.
- We prohibit being under the influence of alcohol in the workplace or in any other location where we perform business on behalf of the Corporation.
- We comply with the Drug-Free Workplace Act of 1988 and federal, state, and local laws and regulations concerning violations of criminal drug statutes in the workplace.



Why It Matters

- Using an illegal substance can negatively impact our ability to perform safely, be productive and obtain or maintain a security clearance or continue employment.

Did you know?

For the purposes of our policy, being “under the influence” doesn’t necessarily mean being above the legal limit.

What to Watch Out For

- As a U.S. federal contractor, Lockheed Martin is required to maintain a drug-free workplace. In the United States, state and local initiatives legalizing marijuana for medical or recreational purposes do not change this requirement.
- If you or a colleague has a drug or alcohol dependency issue, take advantage of company resources for help.

Key Policies

- CRX-525 Tobacco- and Smoke-Free Environment
- CRX-545 Drug-Free Workplace

Substance abuse can put all employees at risk, damage morale, decrease productivity, impact the safety of our products/services and harm the organization's public image.

We are Committed to Security

WE SET THE STANDARD

- We protect our people, operations and assets.
- We take action to mitigate threats to employee safety.
- We properly safeguard all classified material and other information entrusted to us.
- We comply with and seek to exceed customer and national security policy requirements.
- We maintain dedicated counterintelligence and insider threat detection programs.
- We use a thorough and objective security investigative process.

Why It Matters

- Security compliance benefits our Corporation, customers, national security and global stability.
- Adherence to security requirements supports contract performance and enables our products and services to be delivered uncompromised.
- A strong security program ensures that our workforce operates in safe environments.
- Lockheed Martin is a prime target for a number of threat actors seeking to gain information or to damage or destroy our capabilities.

■ **Our individual commitment supports the security of our employees, customers and business partners.** ■



What to Watch Out For

- You may be the first person to notice concerning changes in a colleague's behavior, or suspicious or unusual activity, such as inquiries or requests for information from external sources regarding company people, facilities, operations, programs or products. It's up to you to report it.
- Ensure that any unauthorized access to information or assets is reported.
- An email security threat can include references to trick you into thinking it's coming from a legitimate source.

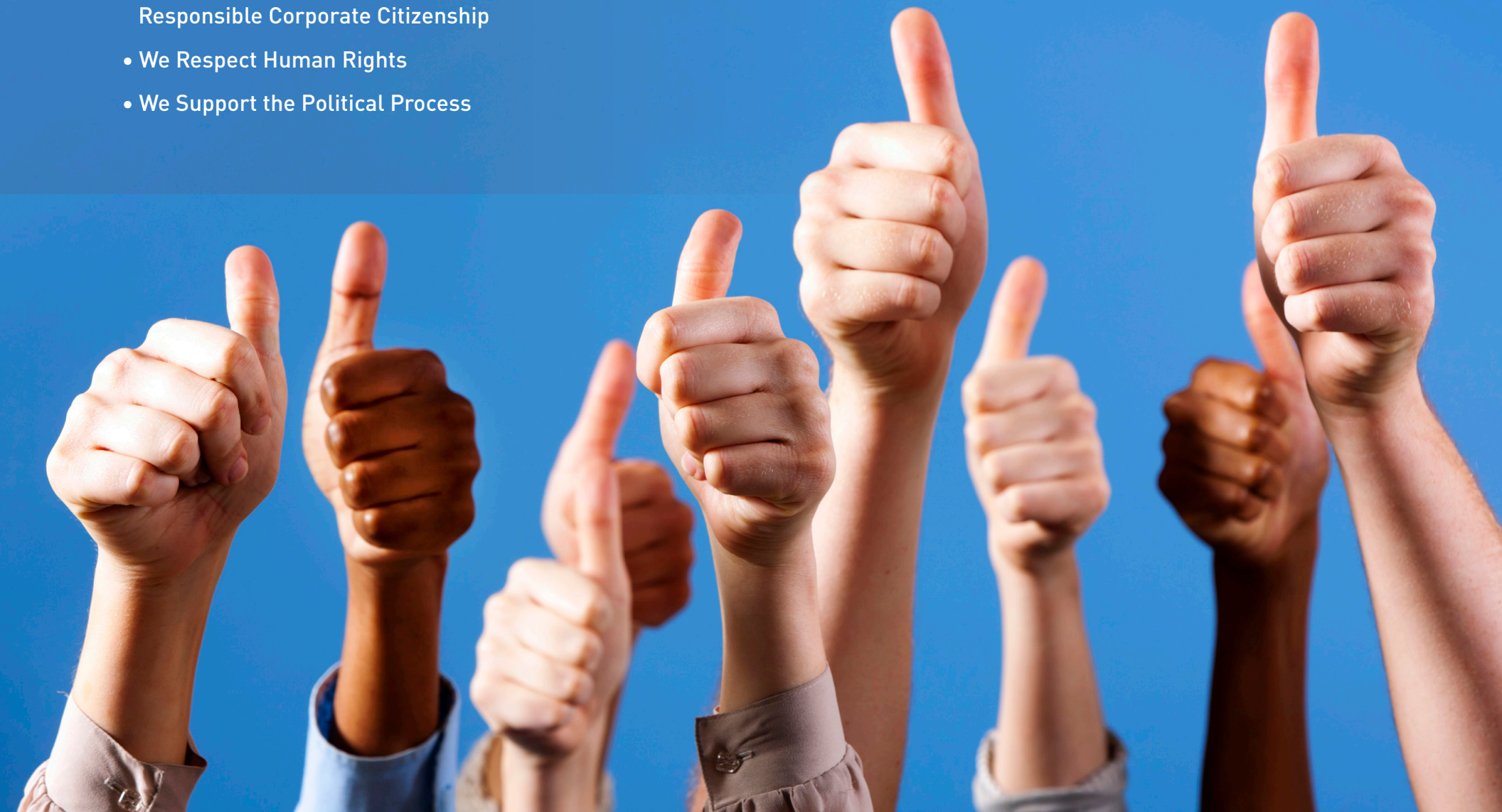
Key Policies

- CPS-569 Security
- CRX-052 Crisis Management
- CRX-053 Workplace Security - Maintaining a Safe and Respectful Workplace Free from Threats and Violence
- CRX-055 Travel or Assignment to Elevated Risk Locations
- CRX-056 International Security Operations
- CRX-057 LMSecurity Procedures
- CRX-059 Insider Threat Detection Program

WE PROMOTE GOOD CORPORATE CITIZENSHIP

We strive to be good citizens and we take responsibility for our actions.

- We are Committed to Sustainability and Responsible Corporate Citizenship
- We Respect Human Rights
- We Support the Political Process



We are Committed to Sustainability and Responsible Corporate Citizenship

WE SET THE STANDARD

- We seek to maximize the positive impacts of our products and services on the environment, the economy, community development and infrastructure resilience.
- We seek to avoid and minimize any negative consequences of our business activities and decisions on the environment, society and our employees.
- We are committed to operating in a manner that protects the environment, conserves natural resources and prevents pollution.

Why It Matters

- These commitments ensure long-term competitiveness of our business.
- Our sustainability performance improves customer relationships and quality, reduces cost and risk, and drives innovation.

Key Policies

- CPS-021 Good Corporate Citizenship and Respect for Human Rights
- CPS-803 Sustainability



■ Our global policies, procedures and practices reflect our strong commitment to responsible corporate citizenship. ■

Did you know?

Responsible corporate citizenship is part of our business strategy, which shapes our mission and informs our choices.

We Respect Human Rights

WE SET THE STANDARD

- We believe that respect for human rights is an essential element of being a good corporate citizen.
- We recognize the importance of human rights across the globe, including:
 - treating employees with respect, championing diversity and inclusion
 - promoting fair responsible employment and wage & hour practices
 - providing fair and competitive wages
 - prohibiting harassment, bullying, discrimination, use of child or forced labor, or trafficking in persons for any purpose
- We respect the right of employees to exercise their right of free association and to choose or not choose collective bargaining representation.
- We are committed to ensuring our employees and suppliers take appropriate steps to ensure respect for human rights in our business and supply chain.
- We adhere to human rights precepts in our relations with stakeholders and through our products and services.

Why It Matters

- Protecting and advancing human rights:
 - maintains our commitment to integrity and our core values
 - promotes employee satisfaction and productivity
 - enhances competitiveness of our business
- Trafficking in persons and slavery are issues around the world, and if we are not mindful, we could unwittingly engage with third parties who violate these principles.



What to Watch Out For

- Suspicious behavior or activities may indicate the presence of human rights violations.

- CPS-803 Sustainability
- CRX-515 Business Resource Groups and Employee Networks

Key Policies

- CPS-001 Ethics and Business Conduct
- CPS-003 Nondiscrimination and Equal Employment Opportunity
- CPS-021 Good Corporate Citizenship and Respect for Human Rights
- CPS-730 Compliance with Anti-Corruption Laws
- CPS-734 Combating Trafficking in Persons

Did you know?

There are more people in slavery today than at any other time in global history, and human trafficking is the second largest criminal activity in the world.

We Support the Political Process

WE SET THE STANDARD

- We follow corporate policy and the law concerning the political process in all countries where we do business.
- We uphold the spirit and letter of all laws relating to our participation in the political process.

Why It Matters

- Laws governing political contributions, gifts and lobbying are complex.
- Even unintended violations can result in loss of business opportunities, damage to our reputation and civil and criminal penalties.

What to Watch Out For

Employees need to watch out for actions that are:

PROHIBITED

- Using any Lockheed Martin funds, assets or facilities for the benefit of political parties or candidates anywhere in the world without obtaining prior written approval of Government Affairs, or Lockheed Martin International for political activities outside of the United States.

- Many countries, in addition to the United States, may prohibit corporate political contributions. This may include donating corporate funds, goods or services, directly or indirectly, to political candidates, including through consultants or employee work time.
- Local and state laws may limit corporate political contributions and activities.

REQUIRE CAUTION

Contact Government Affairs or Lockheed Martin International (for political activities outside of the United States) for any of the following issues:

- Public Office - Conflicts of interest can arise if you seek or hold public office or serve on commissions or advisory groups.
- Lobbying - Lobbying can be direct or indirect, but either way, it is highly scrutinized. You must follow all applicable rules and regulations, particularly avoiding violations - even unintentional - of corporate policy and federal rules concerning gifts and lobbying.
- U.S. Congressional and Executive Branch - It is important that Lockheed Martin present a single, consistent business message to our U.S. based customer community. Government Affairs works with business areas to develop a united approach to the Corporation's U.S.-based marketing initiatives and policy, regulatory and legislative strategies. To this end, Government Affairs must authorize any interaction with U.S. Congressional members or Executive Branch officials in Washington, D.C. or their employees and staff.
- State and Local Governments - Government Affairs must authorize any interaction with state and local government officials on behalf of Lockheed Martin.
- Non-U.S. Governments - You must know and follow corporate policies and procedures before contacting any member or employee of a non-U.S. entity.



- Individual Political Contributions - Some state and local laws may restrict, limit or require disclosure of personal political contributions made by individual employees or their immediate family members.

PERMITTED

You are encouraged to:

- Participate in the Lockheed Martin Employees' Political Action Committee, if eligible.
- Participate personally in civic affairs and the political process on your own time, and at your own expense.
- Support the political parties and candidates of your choice.

Key Policies

- CPS-004 Political Activity
- CPS-005 International Operations
- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CPS-045 Government Affairs
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-251 Charitable Contributions

Did you know?

Personal participation in the political process supports the best interests of our shareholders and employees.

RECEIPT AND ACKNOWLEDGMENT

I acknowledge that I have received my personal copy of *Setting the Standard*, the Lockheed Martin Code of Ethics and Business Conduct and that I have read, understand and will abide by the Code. I understand that each Lockheed Martin employee, member of the Board of Directors, consultant, contract laborer or other agent representing or acting for the Corporation is responsible for knowing and adhering to the principles and standards of the Code. I also understand that violations of the Code are cause for corrective action, which may result in disciplinary action up to and including discharge.



Signature: _____ Print Name: _____ Employee Number (if applicable): _____

Company: _____ Date: _____ Location _____

Contact Human Resources or the Ethics Office for instructions on submitting this form and arranging for a record of completion. If you are not a Lockheed Martin employee, contact your Lockheed Martin point of contact.

DO WHAT'S RIGHT - We are committed to the highest standards of ethical conduct in all that we do. We believe that honesty and integrity engender trust, which is the cornerstone of our business. We abide by the laws of the countries in which we do business. We strive to be good citizens and we take responsibility for our actions.

RESPECT OTHERS - We recognize that our success as an enterprise depends on the talent, skills and expertise of our people and our ability to function as a tightly integrated team. We appreciate our diversity and believe that respect – for our colleagues, customers, partners, and all those with whom we interact – is an essential element of all positive and productive business relationships.

PERFORM WITH EXCELLENCE - We understand the importance of our missions and the trust our customers place in us. With this in mind, we strive to excel in every aspect of our business and approach every challenge with a determination to succeed. We seek not only the highest accomplishments as individuals, but also seek to help our fellow team members achieve at the highest levels.



ETHICS AND
BUSINESS CONDUCT

EXCELLENCE THROUGH INTEGRITY

1-800-LM ETHIC (1-800-563-8442)
Caller ID not used

For the Hearing or Speech Impaired:
1-800-441-7457

Internationally: when calling or faxing from outside
the U.S., first dial the origin country's exit code

Email: corporate.ethics@lmco.com

Mail:
Corporate Ethics Office
Lockheed Martin Corporation
6801 Rockledge Drive
Bethesda, MD 20817

