

Corporate Headquarters
Corporate Policy Statement CPS-001
Revision: 24
Effective: January 13, 2022
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Ethics and Business Conduct

Code of Ethics and Business Conduct
Supplier Code of Conduct
Office of Ethics and Business Conduct
Ethics Directors and Officers
Ethics and Business Conduct Steering Committees
Training
Making Inquiries and Reporting Violations
General Applicability Statement

1.0 Policy

1.1 We will conduct our business with honesty and integrity. We will comply with the laws and regulations of the United States and each country in which we operate, except to the extent inconsistent with U.S. law. Any real or apparent inconsistency between U.S. and international law must be referred to the Vice President & Associate General Counsel International, Government Contracts, and Global Supply Chain for resolution.

and others who represent or act for us. The program is implemented through this policy, which applies to all elements and employees, and the Code, which applies to all elements, employees, the Board of Directors, and others who represent or act for us.

2.2 With respect to subsidiaries that are wholly owned or controlled by Lockheed Martin, the Responsible Organization (as defined in CRX-007, Wholly Owned Subsidiaries) will ensure that such entities have adopted, in substantial part, the Lockheed Martin ethics and business conduct program appropriate to the subsidiary's size and risk.

2.3 With respect to entities that Lockheed Martin neither wholly owns nor controls, but in which Lockheed Martin owns a substantial interest, Lockheed Martin will communicate an expectation that the entity will adopt an ethics and business conduct program consistent with the Lockheed Martin Supplier Code of Conduct. Lockheed Martin recognizes the DII Supplier Code of Conduct as equivalent to the Lockheed Martin Supplier Code of Conduct.

3.0 The Lockheed Martin Ethics and Business Conduct Program

3.1 The ethics and business conduct program includes the Code, the Lockheed Martin Supplier Code of Conduct (the Supplier Code), the Ethics staff, ethics and business conduct steering committees, training, and procedures for reporting violations. These program elements are described below. More information is on the ethics and business conduct website.

The Code and the Supplier Code

3.2 The Code establishes the principles by which we maintain our commitment to ethical business practices. The Lockheed Martin Board of Directors has adopted the Code. The Code will be distributed to all employees, the Board of Directors, and other non-employees who represent or act for us. All employees must acknowledge that they have read, understand, and

Ethics Director. Each business area Ethics Director will ensure that Ethics Officers and Adjunct Ethics Representatives are assigned as needed to provide full coverage of the business area.

Lockheed Martin Executive Leadership Team and Ethics and Business Conduct Steering Committees

3.6 The Lockheed Martin Executive Leadership Team guides the ethics and business conduct program, supporting the Lockheed Martin Strategic Plan by enabling the business areas to create a working environment where it is universally recognized that good ethics is good business.

3.7 Each business area will establish steering committee(s) to oversee its ethics and business conduct program. The steering committee(s) will be chaired by the relevant senior executive and will include as members, at a minimum, the senior representatives of the following functions. An alternative makeup for any steering committee may be submitted for the approval of the corporate Vice President Ethics and Business Conduct.

- Ethics
- Finance and Business Operations
- Communications
- Legal
- Human Resources
- Strategy and Business Development.

3.8 Steering committees established under 3.7 will review metrics on investigations and requests for guidance, trends, and employee survey results; corporate ethics and compliance training; assessments of ethics program performance, including results of ethics program assessments and employee surveys; and ethics and compliance communications. The committees will develop appropriate action plans and may refer matters to the corporate Vice President Ethics and Business Conduct who will refer matters to the Lockheed Martin Executive Leadership Team for consideration as appropriate.

Ethics Awareness Training and Business Conduct Compliance Training

Compliance Committee periodically reviews and approves the training program to ensure that it addresses areas presenting significant risk to the Corporation. Corporate Ethics and Business Conduct will develop a compliance training plan, including subjects, target audiences, and course frequency. Business area Executive Vice Presidents and corporate senior executives will implement the plan, ensuring that assigned compliance training is completed. Business area Executive Vice Presidents and corporate senior executives also must develop, publish, and implement any supplemental compliance training plans required for their organizations.

3.13 The corporate Vice President Ethics and Business Conduct or the Senior Vice President, General Counsel & Corporate Secretary may require some non-employees to receive ethics awareness training or business conduct compliance training.

Making Inquiries and Reporting Violations

3.14 If you are unsure what to do in a particular situation or need guidance on the Code, policies, procedures, or the law, consult your supervisor, manager, Human Resources, Legal Counsel, or the Ethics Office. It is always better to obtain guidance before acting.

3.15 If you have good reason to believe that a violation of laws, regulations, policies, procedures, or the Code has occurred, or you are asked to violate the same, you should not remain silent. You are responsible for reporting the violation or suspected violation, or any instances of significant employee misconduct, directly to your supervisor, manager, Human Resources, Ethics Office, Legal Counsel, or other appropriate functional organization. If your supervisor or manager is personally involved, report the violation to your Ethics Officer or Human Resources Business Partner. Depending on the circumstances, failure to report a violation or a suspected violation may itself violate the Code.

3.16 Furthermore, other Lockheed Martin policies and procedures require employees immediately to report information or concerns about potential violations of law, misconduct, or overpayments by the government (see, for example, CPS-718, Disclosures to the United States Government; CPS

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5.3 Consult your supervisor, manager, Human Resources, Legal Counsel, or the Ethics Office if you are unsure what to do in a particular situation or for guidance on the Code, policies, procedures, or the law.

5.4 Report violations and suspected violations of laws, regulations, policies, procedures, or the