



Corporate Headquarters  
Corporate Policy Statement CPS-730  
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## Compliance with Anti-Corruption Laws

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### 1.0 Policy

1.1 Lockheed Martin will conduct our business activities in accordance with applicable anti-corruption laws, rules, and regulations, and the Corporation's Code of Ethics and Business Conduct, Setting the Standard. Corruption substantially erodes the public's trust, impairs economic and social development, threatens stability and security, and undermines fair trade and competition. Lockheed Martin recognizes the corrosive effect that corruption has on democracy and good governance and is committed to ensuring that the Corporation and those who conduct business on its behalf do so with integrity and the highest ethical business standards and in full compliance with the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and other applicable anti-corruption laws (collectively, "Anti-Corruption Laws").

1.2 Lockheed Martin will not engage in and has zero tolerance for bribery and corruption in any form in its business dealings. At times, observance of this commitment may place the Corporation in a noncompetitive business position; however, strict compliance with Lockheed Martin's Code of Ethics and Business Conduct, Setting the Standard, and this policy is of greater value to the Corporation than any business that may be lost. This policy enacts rigorous business standards, even where local law or custom may appear to permit less exacting business standards.

## **2.0 Applicability**

2.1 This policy applies to all officers, members of the Board of Directors, and employees of the Corporation and its subsidiaries within and outside the U.S., and, by written agreement, all appropriate provisions apply to any domestic or international representative, distributor, reseller, consultant, broker, agent, or any other person or firm by whatever name known, of any nationality, who is conducting business for or on behalf of the Corporation or its subsidiaries (each a “Covered Person”, as defined in this policy).

2.2 With respect to other entities that Lockheed Martin owns or controls, Lockheed Martin will ensure that such entities have adopted this or a similar anti-corruption compliance policy.

2.3 With respect to entities where Lockheed Martin holds a non-controlling ownership interest, Lockheed Martin will use best efforts to ensure that such entities adopt and maintain appropriate controls and take steps necessary to comply with applicable anti-corruption laws.

## **3.0 Definitions**

*Anti-Corruption Program Team (ACPT)* – Attorneys designated by the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain who have the authority to determine and direct anti-corruption compliance.

*Bribe/Bribery* – 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. The thing of value can be of any kind (e.g., gift, travel, entertainment, payment) and is not subject to any minimum amount or threshold of value. In addition, it is not necessary that the corrupt act succeed or that the person to whom the payment, offer, or promise is made actually accepts or receives the bribe.

*Business Relations* – Customers, suppliers, subcontractors, prime contractors, banks, law firms, partners, consultants, agents, educational institutions, or any individual providing products or services to or receiving products or services from Lockheed Martin. Any individual or group with whom we seek to do business or who seeks to do business with us is considered a business relation. Defined subsets of business relations include commercial relations, public officials, and government-owned instrumentalities.

*Commercial Relations* – Subset of business relations who are not government entities, government-owned instrumentalities, or public officials. Examples include, but are not limited to, to private sector companies, firms, associations, non-profit organizations, non-governmental organizations, media organizations, or unaffiliated private persons.

*Covered Person* – Any officers, members of the Board of Directors, or employees of Lockheed Martin Corporation and its subsidiaries within and outside the U.S., and by written agreement any domestic or international representative, distributor, reseller, consultant, broker, agent, or any other person or firm by whatever name known, of any nationality, who is conducting business for or on behalf of the Corporation or its subsidiaries.

*Due Diligence* – A risk-based assessment of a third party to identify, mitigate, or resolve any information concerning the legal, ethical, reputational, financial, or other compliance risks that the third party may pose to Lockheed Martin before entering into a business relationship with

the third party. Anti-corruption due diligence will be conducted in accordance with corporate policies, procedures, and guidance adopted by the ACPT.

*Element Legal Counsel* – The Lockheed Martin attorney supporting a Lockheed Martin element (as defined in CRX-003, Policies and Procedures).

*Government-Owned Instrumentality* – An entity that is owned or controlled by a government. Government ownership or control can be whole, majority, or partial. Whether a particular entity will be treated like an instrumentality for the purposes of this policy requires a fact-specific analysis of the entity's ownership, control, status, and function by element Legal Counsel.

*Kickback* – Any money, fee, commission, credit, gift, gratuity, thing of value, loan, entertainment, service, or compensation of any kind that is provided in exchange for a favor (whether business related or not). Kickbacks are a type of bribe where the two parties are in collusion so that each party gains from the exchange.

*Public Official* – A 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;
- 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.

*Reportable Hospitality* –

- Anything of value provided to a non-U.S. public official (or such official's family members) without prior approval, if such approval is required, by this policy, CPS-008, Gifts, Hospitality, Other Business Courtesies, and Sponsorships, or the applicable International Hospitality Rules;
- Any facilitating payments or personal safety payments; and
- Any cash payment, including a per diem payment, made to a non-U.S. public official which is not expressly authorized or required by a government contract (when the contract has not been approved by element Legal Counsel or does not contain appropriate anti-corruption control measures).

"Reportable Hospitality" does not include:

- Business courtesies which are within the specified monetary limits and comply with any other stated requirements described in CPS-008 or the applicable International Hospitality Rules;

- Business courtesies approved in advance by element Legal Counsel in accordance with the CPS-008 exception request process; or
- Anything of value when specifically authorized or required by a government contract (when the contract has been approved by element Legal Counsel and contains appropriate anti-corruption control measures).

*Responsible Officer* – A member of the Lockheed Martin Executive Leadership Team or designee, or the senior executive of any other element or his or her designee.

*Third Party* – An individual or entity other than Lockheed Martin such as a consultant, contractor, partner, competitor, joint venture partners, proposed acquisitions, teammates, supplier, subcontractors, higher-tier customers or prime contractors, licensees, freight forwarders, or customs brokers.

*Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain designee* – Is any of the following:

- The Corporate Associate General Counsel for Anti-Corruption Compliance, who acts as the ACPT lead;
- The Corporate Associate General Counsel for International Law;
- A designated Business Area Anti-Corruption Counsel (BAAC), who acts as the primary anti-corruption counsel for his or her respective business area; or
- A Lockheed Martin attorney delegated specific anti-corruption legal compliance authority by the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain.

## **4.0 Anti-Corruption Laws**

### FCPA

4.1 The U.S. Foreign Corrupt Practices Act (FCPA) prohibits corruptly offering, promising, authorizing, or giving, directly or indirectly, “anything of value” to a foreign official to obtain or retain business or to secure any improper business advantage. The FCPA also requires U.S. public companies to establish and keep accurate books and records and to devise and maintain an adequate system of internal accounting controls.

### U.K. Bribery Act

4.2 The U.K. Bribery Act prohibits giving, promising, offering, requesting, or receiving bribes as well as bribing a public official whether foreign or domestic. Unlike the FCPA, the U.K. Bribery Act prohibits private (commercial) sector bribery in addition to foreign government officials. The U.K. Bribery Act establishes a “strict liability” offense for a company’s failure to prevent its “associated persons” (e.g., employees, agents, business partners, or representatives) from committing bribery to obtain or retain a business advantage. The U.K. Bribery Act applies to any company that “carries on a business or part of a business, in any part of the United Kingdom” even if the bribery does not take place in the U.K. and the intended benefit is to be outside the U.K.

### Other Anti-Corruption Laws

4.3 Numerous countries have adopted laws that criminalize bribery or other corrupt conduct. Many of these countries have signed the Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions that requires the adoption of laws criminalizing bribery of public officials in international business transactions. Similarly, the United Nations Convention Against Corruption requires signatory countries to criminalize a wide range of corrupt acts including domestic and foreign bribery and related offenses such as money laundering and obstruction of justice, and to render mutual assistance in the prevention and investigation of corruption and the prosecution of offenders.

## **5.0 Penalties**

5.1 Violations of anti-corruption laws can result in civil and criminal penalties against the Corporation, including fines, disgorgement of profits, and debarment from government procurement, and civil and criminal penalties against individual employees, including imprisonment, civil fines, and personal debarment from government procurement.

5.2 Lockheed Martin will fully cooperate with regulatory and law enforcement authorities in the investigation and prosecution by such authorities of alleged violations of anti-corruption laws. In addition to potential criminal or civil penalties, violations of anti-corruption laws or this policy by any Covered Person will result in disciplinary action up to and including termination of employment or contract.

## **6.0 Anti-Corruption Program**

6.1 Lockheed Martin has established a comprehensive Anti-Corruption Program (ACP) to identify, manage, and mitigate corruption risks associated with the Corporation's business activities. The primary objective of the ACP is to effectively promote an organizational culture that encourages conduct compliant with anti-corruption laws and Lockheed Martin's Code of Ethics and Business Conduct, Setting the Standard.

6.2 The ACP is built upon the following principles:

- Commitment from Leadership to lead and foster a culture of anti-corruption compliance where individuals are encouraged to ask questions and report concerns;
- Establishment of roles and responsibilities for individuals including appropriate levels of authority and accountability to oversee the implementation of the ACP and assure proper allocation of resources;
- Continuous assessment and monitoring of corruption risks to ensure appropriate steps are taken to mitigate and prevent occurrence;
- Effective and continuous training to ensure that the Corporation's policies are effectively communicated, understood, and followed;
- Effective enforcement of the ACP through timely and fair application of appropriate incentives and discipline;
- Performance of risk-based due diligence of business relations;
- Establishment of an ACPT comprised of the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain designees to provide efficient, timely, and uniform anti-corruption legal advice across the Corporation.

6.3 On a quarterly basis, the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain will provide a report describing the state of the ACP and associated metrics of compliance with this policy to the Senior Vice President, General Counsel & Corporate Secretary. Each BAAC will provide a similar report quarterly to their respective business area Vice President & General Counsel describing the state of that business area's ACP implementation and associated metrics of compliance with this policy.

## **7.0 Roles and Responsibilities**

7.1 It is the individual responsibility of each Covered Person to comply with this policy. In addition, executive vice presidents, senior vice presidents, all members of business and program management teams, and all functional leaders are responsible for implementation of and compliance with this policy within their respective organizations.

7.2 Each Responsible Officer will ensure that:

- All Covered Persons are fully informed of the prohibitions and requirements of anti-corruption laws and this policy;
- Appropriate controls are adopted and enforced to effect compliance with this policy by all Covered Persons;
- Entities owned or controlled by the Corporation or its subsidiaries adopt policies and procedures effectively implementing this or a similar anti-corruption compliance policy, and take the steps necessary to ensure compliance with anti-corruption laws by all of their directors, officers, employees, and international consultants; and
- With respect to entities where Lockheed Martin holds a non-controlling ownership interest, best efforts are used to ensure that such entities adopt and maintain appropriate controls and take steps necessary to comply with applicable anti-corruption laws and the spirit of this policy. The Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain or designee must be advised of the controls that are proposed to be implemented.

7.3 The Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain or designees will advise element Legal Counsel and general counsel, executive vice presidents, and senior vice presidents on the interpretation and application of anti-corruption laws and this policy. The Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain and designees are delegated authority to direct, coordinate, and approve anti-corruption compliance matters, including the sufficiency of due diligence activity, unless otherwise specified.

7.4 Each business area Vice President & General Counsel will support the business area's Responsible Officer in ensuring that all business area Covered Persons are fully informed of the prohibitions and requirements of anti-corruption laws and this policy, appropriate controls are adopted and enforced, and necessary steps to effect compliance with this policy are taken.

7.5 Element Legal Counsel has initial responsibility to conduct risk-based, anti-corruption due diligence in accordance with corporate policies, procedures, and guidance provided by the ACPT. Element Legal Counsel will coordinate with, and receive direction from, his or her respective BAAC or the Corporate Associate General Counsel for Anti-Corruption Compliance or the Corporate Associate General Counsel for International Law, as appropriate. Element

Legal Counsel will ensure completed anti-corruption due diligence legal files are consolidated and retained as directed by the ACPT and Lockheed Martin policies and procedures.

## **8.0 Prohibitions and Requirements**

### General Prohibition

8.1 Unless permitted by this policy, CPS-008, Gifts, Hospitality, Other Business Courtesies, and Sponsorships, or CPS-716, Compliance with the Anti-Kickback Act of 1986, no offer, payment, promise to pay, or authorization to pay or provide anything of value, directly or indirectly, will be made to any public official, commercial relation, or any other person, while knowing or being aware of a high probability that all or a portion of such thing of value will be offered, given, or promised to a public official or a commercial relation.

8.2 These prohibitions apply whether or not the thing of value is derived from the Corporation's funds or resources or from a Covered Person's personal funds or resources.

8.3 A Covered Person may not solicit, accept, or receive anything of value, directly or indirectly, from any public official, commercial relation, or any other person or entity where acceptance may constitute or is likely to create the appearance of a bribe or kickback.

### Gifts, Hospitality, Other Business Courtesies and Sponsorships

8.4 A Covered Person will not offer or provide any gifts, hospitality or other items, including cash or cash-equivalent gifts, sponsorships, or anything to any person or entity to induce improper action or secure an improper business advantage.

8.5 CPS-008 sets forth the specific guidance, limits, and necessary approvals for offering or receiving any business courtesy or sponsoring any event. Where a proposed offering or provision will exceed stated value thresholds or otherwise not comply with the applicable CPS-008 guidelines (including the country-specific International Hospitality Rules) concerning non-U.S. public officials and non-U.S. commercial relations, Covered Persons must seek pre-approval from their element Legal Counsel as required by CPS-008. Element Legal Counsel will review and coordinate legal concurrence for any exceptions, consulting with his or her respective BAAC or the Corporate Associate General Counsel for Anti-Corruption Compliance or the Corporate Associate General Counsel for International Law, as appropriate.

8.6 Providing a business courtesy which does not comply with the applicable CPS-008 guidelines (including any applicable International Hospitality Rules) without the required prior Legal approval constitutes "Reportable Hospitality" and is a violation of this policy and CPS-008.

### Political Activities and Charitable Contributions

8.7 Consistent with CPS-004, Political Activity, under no circumstances will any money, assets, property, or other thing of value to the Corporation, any of its subsidiaries or other legal entities be contributed, loaned, or made available to any non-U.S. candidate, party, or political committee.

8.8 The Corporation may make charitable contributions in accordance with CRX-251, Charitable Contributions. Under no circumstances may a charitable contribution be made to an organization owned, controlled, or connected to a public official, or at the suggestion, request, or at the behest of any public official, to obtain any improper advantage. Before a contribution is authorized, the responsible Covered Person must ensure that element Legal Counsel has conducted sufficient due diligence to ensure compliance with the requirements of CRX-251.

### Facilitating Payments

8.9 Facilitating payments (also known as “expediting payments” or “grease payments”) are strictly prohibited by Lockheed Martin. Facilitating payments are payments that are generally low in value and made to a public official to expedite routine, non-discretionary government acts that the official is required to perform and over which the official has no discretion (e.g., permits, licenses, goods inspections, customs clearances, and visa processing). For purposes of this provision, legally mandated fees payable directly to governmental agencies for expedited administrative services are not considered prohibited facilitating payments if such fees are established in an open and transparent manner and if a proper receipt is provided.

8.10 The Corporation prohibits facilitating payments made on its behalf or on behalf of its controlled entities and will not make reimbursements for facilitating payments except when authorized as described in 8.11.

8.11 In the rare instance that an exception to this prohibition may be deemed necessary, it requires advance written approval from element Legal Counsel with the concurrence of the respective BAAC, or the Corporate Associate General Counsel for Anti-Corruption Compliance or the Corporate Associate General Counsel for International Law, supported by analysis of the facts and circumstances and applicable anti-corruption laws, and accurate accounting for any approved facilitating payment in the books and records of the Corporation and its subsidiaries as a clearly identified “facilitating payment.” The BAAC or Corporate Associate General Counsel will consult with the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain for final concurrence.

### Personal Safety Payments

8.12 Lockheed Martin recognizes that individuals may encounter situations when payment is required or demanded to avoid physical harm. Only when there is an imminent threat to personal health or safety (rather than mere economic coercion or convenience) may an employee make a personal safety payment. Examples of such situations include:

- Being stopped by persons claiming to be police, military, or paramilitary personnel, who demand payment as a condition of passage;
- Being threatened with imprisonment for a routine traffic or visa violation unless a payment is made; or
- Being asked by persons claiming to be security personnel, immigration control, or health inspectors to pay for (or to avoid) an allegedly required inoculation or similar procedure.

8.13 If circumstances permit, element Legal Counsel should be consulted before making any payment. When a personal safety payment is made, as soon as possible (but no later than seven days) after the danger has passed, it must be reported to element Legal Counsel and in an expense report accurately reflecting the amount paid, recipient, means of payment, and the



circumstances requiring the payment. Element Legal Counsel, with the concurrence of the respective BAAC, or the Corporate Associate General Counsel for Anti-Corruption Compliance or the Corporate Associate General Counsel for International Law, will determine and document the circumstances surrounding the personal safety payment, and assist Finance to ensure that the payment is promptly and accurately recorded in the Corporation's books and records as a clearly identified "personal safety payment." The BAAC or Corporate Associate General Counsel will consult with the Vice President & Associate General Counsel –International, Government Contracts & Global Supply Chain for final concurrence.

#### Anti-Corruption Due Diligence and Monitoring of International Third Parties, Agreements, and Acquisitions

8.14 Before establishing any international business relationship with a third party on behalf of Lockheed Martin or its subsidiaries and affiliates, Covered Persons must consult with element Legal Counsel to determine the appropriate level of risk-based anti-corruption due diligence necessary to: (1) evaluate the business reputation of the third party and the risks posed to the Corporation in doing business with the third party; (2) understand and document the business rationale for including the third party; and (3) inform the third party of the Corporation's compliance program and commitment to ethical business conduct and compliance with anti-corruption laws and obtain the third party's assurances that it will comply with such commitments. This requirement applies to proposed agreements and renewal of agreements with non-U.S. consultants, joint venture partners, acquisitions, teammates, subcontractors and suppliers, higher-tier customers or prime contractors, pass through customers such as resellers or distributors, licensees, and other third parties performing services on behalf of Lockheed Martin (or its subsidiaries and affiliates), such as freight forwarders and customs brokers. As part of the due diligence and assurance process, Form C-730-1, International Anti-Corruption Questionnaire, Form C-730-2, Anti-Corruption Law Certification, or appropriate similar questions and representations may be required.

8.15 Due diligence requires fact-collecting and will vary depending on the applicable risk factors, including any "red flags" presented by the establishment of a relationship with a potential party or transaction. The Lockheed Martin individual responsible for establishing the business relationship has the primary responsibility for fact-collecting and will ensure that timely requests for due diligence are submitted using the CPS-730 Anti-Corruption Due Diligence Request tool.

Note: The tool will not be used to request and record due diligence determinations for:

- International business development consultants (CRX-011 describes the due diligence process); or
- Merger or acquisition targets (Corporate Development manages the process for, and recording of due diligence as described in CPS-016, Mergers, Acquisitions, Divestitures, Business Ventures, and Investments).

8.16 The company will not enter into an international business relationship with a party as described in section 8.14 before anti-corruption due diligence is complete and the Lockheed Martin individual responsible for establishing the relationship has obtained the written concurrence of a Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain designee that:

- Due diligence establishes sufficient evidence of likely future compliance with anti-corruption laws;

- Any potential anti-corruption risks are identified and addressed; and
- The agreement contains adequate anti-corruption law compliance provisions, including, in the case of a joint venture or teaming agreement, a requirement for the entity to establish necessary policies, procedures, and roles and responsibilities to ensure an effective compliance program.

8.17 During the term of any international agreement, the relevant business area Vice President & General Counsel will ensure that the original due diligence is periodically reassessed and updated for the continuing likelihood of anti-corruption compliance by a teammate or partner and, in the case of a joint venture or teaming agreement, that associated compliance policies and procedures are being maintained (by the applicable entity) and are effective.

8.18 Covered Persons must retain anti-corruption due diligence files in accordance with CRX-008A, Corporate Records Retention Schedule, and as may be directed by the ACPT.

#### Relevant Policies for International Third Party Agreements and Acquisitions

8.19 Before entering into international agreements or business relationships, review the policies listed below, if applicable, to ensure compliance with additional anti-corruption requirements. Early consideration of anti-corruption compliance requirements is advised.

- CPS-009, New Business Opportunity Management
- CPS-016, Mergers, Acquisitions, Divestitures, Business Ventures, and Investments
- CPS-720, Compliance with the Antitrust Laws
- CRX-011, International Business Development Consultants
- CRX-014, Individual Conflict of Interest
- CRX-025, Teaming Agreements

Note: International suppliers of goods and services are managed through Global Supply Chain Operations (GSCO). GSCO has established appropriate provisions in the Corporation's acquisition procedures and supplier registration process to implement this policy. When the acquisition procedures require GSCO personnel to obtain a specific anti-corruption due diligence review of a proposed supplier, the request must be made using the CPS-730 Anti-Corruption Due Diligence Request tool. After an international supplier is retained, GSCO will review it for anti-corruption compliance on a periodic basis thereafter.

#### Recordkeeping and Accounting Controls

8.20 Lockheed Martin and its subsidiaries will keep and maintain books, records, and accounts that fairly and accurately reflect, in reasonable detail, transactions and the transfer or disposition of the assets of the Corporation and its subsidiaries. All contracts or records must accurately describe the transactions to which they relate, and no false or misleading entries shall be made in the books, records, or accounts of the Corporation or its subsidiaries for any reason. Payments made on behalf of Lockheed Martin will include adequate supporting documentation to accurately describe the nature and purpose of any payment.

8.21 The Corporation and its subsidiaries will maintain a system of internal accounting controls sufficient to provide reasonable assurances that:

- Transactions are executed in accord with management's general or specific authorization;
- Transactions are recorded as necessary to permit (1) preparation of financial statements in conformity with U.S. Generally Accepted Accounting Principles (U.S. GAAP) or in the case of international operations, in a manner that can be translated into U.S. GAAP for financial reporting purposes, and (2) to maintain accountability for assets;
- Access to assets is permitted only in accordance with management's general or specific authorization; and
- The recorded accountability for assets is compared with the existing assets at reasonable intervals and appropriate action is taken with respect to any differences.

8.22 Lockheed Martin bank accounts should be opened or closed only upon the prior written approval of the corporate Vice President & Treasurer or an Assistant Treasurer of Lockheed Martin Corporation and in accordance with Treasurer's Operating Instruction TOI-10-1, Establishment/Closure of Bank Accounts and Signatory Changes. Anonymous ("numbered") accounts will not be maintained.

8.23 Receipts, whether in cash or checks, will be deposited promptly in a bank account of the Corporation.

8.24 Payments will not be made into anonymous accounts or accounts not in the name of the payee or of an entity known to be controlled by the payee.

8.25 Payments will not be made in cash, except for regular, approved cash payroll payments or normal disbursements from petty cash supported by signed receipts or other appropriate documentation.

8.26 Checks will not be drawn to the order of "cash," "bearer," or similar designations. Check requests will be in writing and contain a complete explanation of the purpose of and authority for the payment. The explanation will accompany all documents submitted in the course of the issuing process and be kept on file at the paying location.

8.27 Fictitious entities, sales, purchases, services, loans, or financial arrangements, including fictitious invoices, over-invoices, or other misleading documentation, will not be used.

8.28 Purchase orders will not be entered into with, and no payments will be made to a public official. Instead, purchase orders and related payments will be made to the government or government-owned or -controlled commercial enterprise. Lockheed Martin purchase orders and payments must be made in accordance with CPS-113, Acquisition of Goods and Services.

8.29 Commercial card payments will not be made to a public official. Any such payment must be made to the government or government-owned or -controlled commercial enterprise. Commercial card payments must be made in accordance with CRX-327, Commercial Cards.

8.30 Payments for any services rendered to the Corporation by a public official will not be made to the individual but will be made directly to the government agency or instrumentality employing the individual. Payments must be made by check or by wire to its named account in the government agency's or instrumentality's country, or by wire through its duly authorized correspondent bank in the United States. No such payment for services may be made without the prior written approval of the business area Vice President & General Counsel or the Vice

President & Associate General Counsel – International, Government Contracts, & Global Supply Chain or designee. Incidental cash or cash equivalent payments (e.g., reimbursement of expenses or per diem payments) may only be provided directly to the individual public official when prior written approval of element Legal Counsel is obtained in accordance with CPS-008.

8.31 The corporate Vice President & Controller will ensure that the Corporation's accounting and recordkeeping activities, policies, manuals, and instructions are compliant with the anti-corruption laws with respect to being complete and accurate.

8.32 Personnel responsible for the Corporation's financial books, records, and internal accounting controls periodically must review these books, records, and controls in accordance with CPS-011, Internal Control and Enterprise Risk Management, and the Corporate Controller's Manual to ensure their compliance with anti-corruption laws.

8.33 Each Covered Person is responsible for accurately recording all his or her transactions which involve any expense of the Corporation or other transactions which dispose of or transfer Corporation assets.

## **9.0 Reporting**

9.1 Lockheed Martin prohibits retaliation against anyone who in good faith reports misconduct.

9.2 Any Covered Person, who suspects or becomes aware of any violation of this policy or any anti-corruption law, must immediately report the violation to the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain or designee. Element Legal Counsel will investigate reported violations and report results to his or her business area Vice President & General Counsel and the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain or designee for determination of any further actions that may be required.

9.3 Alternatively, any Covered Person, who suspects or becomes aware of any violation of this policy or any anti-corruption law, may report it directly to the element's Ethics Officer; or Ethics through the Ethics Helpline (anonymously, if desired) 1-800-LM-ETHIC (1-800-563-8442), corporate.ethics@lmco.com, or Ethics Lockheed Martin Corporation, 6801 Rockledge Drive, MP 211, Bethesda, MD 20817. Such reports will be immediately provided to the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain for determination of any further actions.

## **10.0 Anti-Corruption Compliance Monitoring**

10.1 Lockheed Martin's automated Anti-Corruption Compliance Monitoring Program analyzes certain transactional data against identified anti-corruption red flags. Flagged transactions are subject to a multi-level review and final determination of compliance with this policy and anti-corruption laws. The Responsible Officer for each business area and for certain corporate functional areas, as designated by the Vice President & General Counsel – International, Government Contracts, & Global Supply Chain, will assign appropriate persons ("Reviewers") to conduct the required reviews. Reviewers will comply with the Anti-Corruption Monitoring Process Guide, ensure timely review and sufficient response to a flagged transaction, and report any confirmed violation to the appropriate Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain designee.

10.2 The Responsible Officer for each business area will ensure that his or her elements' accounting and other data systems which are not integrated into the Anti-Corruption Compliance Monitoring Program are identified and are, thereafter, either integrated into the Anti-Corruption Compliance Monitoring Program or are separately screened on a regular basis for potential violations of this policy, CPS-008, and CRX-011 and that confirmed violations are reported to the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain. As necessary, the element's chief financial officer or designee, the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain designee, and/or Corporate Consultant Services will provide inputs, advice, and direction on preparation of any independent reports.

10.3 The reporting requirements described in this section are in addition to and separate from any reports otherwise required by corporate Finance or an element's Finance organization.

### **11.0 Training**

All directors, officers, and employees of the Corporation and all of its wholly-owned subsidiaries involved in international business are required to complete annual training on compliance with anti-corruption laws as determined by the Legal department in consultation with the Ethics department. Annual training of International Business Development Consultants will be conducted in accordance with CRX-011.

### **12.0 Corporate Internal Audit**

In accordance with its annual audit plans, Corporate Internal Audit will periodically assess or audit internal controls across the Corporation to ensure compliance with this policy and anti-corruption laws. Audit reports concerning anti-corruption compliance will be provided to the Vice President & Associate General Counsel – International, Government Contracts, & Global Supply Chain, who will provide the results to the Senior Vice President, General Counsel & Corporate Secretary.

### **13.0 Deviations**

Any deviation from this policy requires the prior written approval of the Owner listed in Lockheed Martin Command Media Central or designee unless legal opinions have been obtained from competent outside counsel that the conduct for which approval is sought does not violate any anti-corruption laws.

//s//Maryanne R. Lavan  
Senior Vice President, General Counsel & Corporate Secretary