HOW the ETHICS PROCESS WORKS
INTRODUCTION

Lockheed Martin employees have a shared commitment to the highest standards of ethical conduct and a vital responsibility for upholding the values of the Corporation.

The senior vice president, Internal Audit, Ethics and Sustainability, is an elected officer of the Corporation, reporting directly to the Chief Executive Office, and to the Ethics and Sustainability Committee of the Board of Directors.

The senior vice president, Internal Audit, Ethics and Sustainability, is responsible for overseeing corporate-wide efforts to promote a work environment that is positive, diverse, open and inclusive, where employees and others can ask questions, express work-related concerns about ethics issues, make inquiries or report violations without fear of retaliation.

The following questions and answers will help you understand our ethics process at Lockheed Martin, as well as the resources available to help you address concerns.
How does Ethics relate to Business Conduct at Lockheed Martin?

Lockheed Martin’s business success depends on our commitment to integrity. We do more than just comply with laws and regulations. We aim to do what is right every day.

It begins with our Corporate Vision: Be the global leader in supporting our customers to strengthen global security, deliver citizen services and advance scientific discovery.

We will accomplish our vision by conducting business according to our values:

- *Do What’s Right*
- *Respect Others*
- *Perform With Excellence*

Who should I contact if I have a problem, question or concern?

As a general guideline, you should first discuss the situation with your manager or supervisor. If that is not possible or if your manager is not able to help you resolve the matter, it is your responsibility to continue to speak up and seek resolution. You can talk to your next level of management or to Human Resources; the Equal Opportunity Program Office where available; Legal; Security; Internal Audit; the Energy, Environment, Safety and Health Organization; or the Ethics Office.
Lockheed Martin must report certain types of misconduct to the government. This underscores the obligation for all employees to report and act to correct any potential ethical concern.

To locate your ethics officer’s contact information:

- View your employee profile in Lockheed Martin’s Enhanced White Pages > click on the Properties tab.
- Look for the ethics officer posters that are on display throughout your facility.
- Another option is to call the Corporate Office of Ethics and Business Conduct, at 1-800-LM-ETHIC (800-563-8442), to report a concern or ask for guidance.

Additional contact methods are listed on the back of this brochure, and are available to both Lockheed Martin employees and external parties.

- If your concern relates to the actions or decisions of an ethics officer, please contact the Business Area Ethics Director.
- If your concern relates to the actions or decisions of a Business Area Ethics Director, please contact the senior vice president, Internal Audit, Ethics and Sustainability.
- If your concern relates to the actions or decisions of the senior vice president, Internal Audit, Ethics and Sustainability, please contact the senior vice president, general counsel and corporate secretary, Lockheed Martin Corporation.
WHAT can you expect when you contact the Ethics Office?

Your ethics officer is a resource for you. If you have a question or need advice, you will be provided with guidance, often in the same phone call. Sometimes your ethics officer will help connect you with a subject matter expert to provide additional information. Other times, it may take a few days to get the information needed to provide guidance to you.

If you observe misconduct or a violation that needs to be reported and requires an investigation, your ethics officer will work with you to resolve your concern.

When you contact the Ethics Office, here is what you can expect:

• Your concern is taken seriously.

• You are treated with dignity and respect.

• You are not required to identify yourself.

• Your communication with the Ethics Office is protected to the greatest extent possible.

• Your concern is addressed and you are kept informed during the investigation.

• You are contacted when the investigation is complete and informed as to whether the findings are substantiated or unsubstantiated.

NOTE: You will not be advised of any discipline administered related to your concern, as we must protect the privacy of the individual(s) impacted.
There is never a penalty for contacting the Ethics Office in good faith. People in a position of authority cannot stop you. If they try, they are subject to disciplinary action up to and including termination of employment.

Lockheed Martin does not tolerate retaliation against employees who raise concerns to any source in good faith. You do not have to be right, but it does mean you believe the information provided is truthful.

How does the Ethics Office support high ethical standards at Lockheed Martin?

The Ethics Office serves as a resource for information, advice and resolution of problems and issues. The ethics program is based on company values and compliance with laws, regulations and policies.

Our ethics officers promote a positive, inclusive and ethical work environment, and provide you with resources, communications, training and tools that support and enhance the expectation of high ethical standards at Lockheed Martin.

A key tool to help employees understand and resolve ethical issues in the workplace is our annual Ethics Awareness Training. In addition, comprehensive Business Conduct Compliance Training, required of all employees, with additional requirements for certain target audiences, provides guidance and information on critical compliance topics.
How do you contact the Ethics HelpLine?

A member of the Corporate Ethics Office answers the Ethics HelpLine, Monday through Friday from 8 a.m. to 5 p.m. Eastern time, except for certain holidays. At other times, you may leave a voicemail and an Ethics Office staff member will contact you as soon as possible during the next business day. You may also contact us via email at corporate.ethics@lmco.com.

Is there caller ID on the 800-LM-ETHIC HelpLine?

Lockheed Martin does not track the phone numbers of those who call the Ethics HelpLine. Also, by special arrangement with our telephone provider, the origins of calls to the HelpLine number do not appear on any phone bills the Corporation receives. Those who call the HelpLine and wish to remain anonymous may do so without concern that their phone number will be identified.

Are HelpLine calls recorded?

Calls to the HelpLine are not recorded, except for voicemails. A confidential voicemail service is used to receive messages when an ethics officer is not available to answer the HelpLine. These voicemail messages are permanently deleted after a representative of the Ethics Office staff retrieves them.
When I call the Ethics HelpLine to report observed misconduct, what information will I be asked to provide?

The more information you can provide, the easier it will be to understand your concern and conduct a thorough investigation. Details such as the name of your program or business unit, the location where the alleged misconduct occurred, the sequence of events, the name of the person you have concerns about, and any witnesses all help us understand and address your situation.

Although it is not a requirement, we encourage callers to the Ethics HelpLine to provide us with their contact information so we can follow up if additional information is needed. Your contact information also allows us to keep you informed and provide you with the results of the investigation.

Can I remain anonymous and still keep track of what is happening on an ethics investigation initiated by my contact?

Yes. We will provide you with a case number so you can contact us about the status or outcome of an ethics investigation that you initiate. You may also provide a personal e-mail account the ethics officer may use to contact you with updates and questions.
How long does it take for an ethics investigation to be completed?

Depending on the nature of the case, an investigation may take anywhere from a few days to several months. The average time to close an ethics case is around 35 days.

How often are ethics cases substantiated? What happens to the cases that are not substantiated?

About 40 percent of all ethics case investigations are substantiated. The remaining 60 percent are unsubstantiated. That means that either: (1) the facts obtained during the investigation did not support the allegation or, (2) there was insufficient information to determine if the allegation was true.

All case records are handled in accordance with the Corporation’s records retention policy.

What typically happens as a result of an ethics investigation when the allegation is substantiated?

Actions taken because of a substantiated ethics allegation vary, depending on the type of case and the severity of the misconduct. Although disciplinary or corrective actions may not be evident to observers, termination of employment, resign/retire in lieu of termination, suspension, written or verbal warnings, or coaching/counseling are some of the actions typically taken. Occasionally, an employee against whom an allegation is substantiated may be removed from their leadership role.
What can I do if I disagree with the outcome of an ethics investigation when the allegation is unsubstantiated?

Reporting parties who believe an ethics investigation into their concern was not thorough or fair, or who have new information that should be considered in the investigation, can request a review via email to the Corporate Office of Ethics and Business Conduct at corporate.ethics@lmco.com.

Please include “Review Request” in the subject line. In your message, include your contact information and the basis for your request, which will be screened by the Corporate Ethics Investigations Office. You will receive a response to your request within 10 business days.

If your request is approved, a corporate ethics director from outside your business area will conduct the review, and may contact you for additional information. Please note that this is not a re-investigation, but an examination of the existing investigation documentation. You will receive the results of the review within approximately 10 business days.

If you remain dissatisfied with the results of the review, you may request a second, and final, review by the senior vice president, Internal Audit, Ethics and Sustainability, by following the same steps as above. Please include “SVP Review Request” in the subject line.
How does Lockheed Martin measure the effectiveness of its ethics process?

The Ethics Office conducts regular analysis to look at trends and information about the types of contacts received, allegations reported and timeliness of response. This data is provided to executive leadership, Ethics Steering Committees and the Ethics and Sustainability Committee of the Board of Directors for discussion and analysis.

Results of our periodic LM Voice employee survey also provide a measure of the effectiveness of the ethics program through employee ratings and comments regarding ethics and integrity.

Those who bring concerns forward are encouraged to complete a voluntary and confidential Reporting Party Feedback Survey to provide feedback about their experience during the investigation process. In addition, a survey is provided to those employees who are the subject of an investigation. This information helps improve the ethics officer’s ability to provide service to those requesting help.

The Ethics Office conducts internal ethics program assessments each year at business locations to assess program implementation and effectiveness.
When in doubt, speak up!

You are encouraged to seek advice from or express concerns about ethical misconduct to whomever you are most comfortable:

- Your supervisor
- Your manager
- Your ethics officer
- Your human resources business partner
- Your Equal Opportunity Program office
- Legal
- Security
- Internal Audit
- Energy, Environment, Safety and Health
- Corporate Ethics Office

Remember, if you have good reason to believe that a violation of laws, regulations, policies, procedures, or the Code of Conduct 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 directly to your supervisor, manager, Human Resources, Ethics Office, Legal Counsel or other appropriate functional organization. Go to the person you are most comfortable consulting when you are uncertain about a situation and take action when you observe a potential ethical violation. Depending on the circumstances, failure to report a violation or a suspected violation may itself be a violation.
HOW the ETHICS PROCESS WORKS

CONTACTS

My Supervisor/Manager is:
Name:__________________________________
Phone Number:___________________________

My Ethics Officer is:
Name:__________________________________
Phone Number:___________________________

My Human Resources Business Partner is:
Name:__________________________________
Phone Number:___________________________
If you have a question or concern regarding an ethics matter, please discuss it with your management, your ethics officer or the Corporate Office of Ethics and Business Conduct.

Call: 800-LM ETHIC (800-563-8442)  
International: Dial the United States access code 01 and 800-563-8442  
For the Hearing or Speech Impaired: 800-441-7457

Write: Office of Ethics and Business Conduct  
Lockheed Martin Corporation  
6801 Rockledge Drive  
Bethesda, MD 20817

Fax: U.S. Access Code 01 (if required) + 301-897-6442

E-Mail: corporate.ethics@lmco.com

Ask Us: http://ethics.corp.lmco.com/ethics/AskUs/index.cfm