

## Other Policies Related to Anti-Corruption

**CPS-004 Political Activity** prohibits contributions of any type to non-U.S. candidates, parties or political committees. Lockheed Martin discloses its Corporate State Contributions, Governors Association Contributions, and LMEPAC Disbursements, as well as its policy on engagement in lobbying activities and the issues on which the Corporation lobbies, publicly on our Political Disclosures webpage.

**CPS-016, Mergers, Acquisitions, Divestitures, Business Ventures, and Investments** mandates compliance with all laws and regulations that apply to these activities. The policy also requires the appropriate due diligence be conducted on the target entity.

**CPS-113, Acquisition of Goods and Services** provides specific direction that all sourcing and procurement activities comply with the applicable laws and regulations wherever we conduct business. The policy establishes evaluation requirements for prospective suppliers in compliance with the applicable laws and regulations. This policy lists specific country procedures for the United States, Australia, Canada, the Netherlands, and the United Kingdom.

**CPS-716, Compliance with the Anti-Kickback Act of 1986** requires that employees who buy goods or services for Lockheed Martin or are involved in the procurement process must not accept gifts from subcontractors and suppliers, except advertising or promotional items of nominal value. Global Supply Chain Operations (GSCO) must ensure that Lockheed Martin informs its suppliers and subcontractors annually in writing of its policy pertaining to gifts, gratuities, and business courtesies, emphasizing that it is unacceptable for Lockheed Martin employees to violate this policy, and that potential violations of this policy should be reported to Lockheed Martin management.

**CPS-718, Disclosures to the United States Government** requires timely reporting to the Office of Inspector General and Contracting Officer when there is credible evidence of potential violation of certain federal criminal laws, a violation of the U.S. Civil False Claims Act, or a significant overpayment. The policy further states that there may be some violations of law or significant employee misconduct that are not Reportable Violations under FAR 52.203-13 but that Lockheed Martin wishes to disclose these voluntarily in the spirit of maintaining the highest standards of business ethics and transparency with U.S. government agencies. Examples of such conduct may include violations of the federal securities laws, violations of the Anti-Corruption Laws for commercial contracts, or violations of procurement laws that are not covered by FAR 52.203-13.

**CPS-720, Compliance with Antitrust Laws** defines specific practices prohibited by the Antitrust Laws and provides guidelines for understanding the primary areas of antitrust concern. The policy also specifies the ramifications of violation for the employee and Lockheed Martin.

**CRX-010 Domestic Business Development Consultants** and **CRX-011 International Business Development Consultants** describe the Corporation's process for conducting due diligence on domestic and international consultants, respectively, at the time of the consultants' initial appointment or contract renewal. The policies limit consultant agreements to a maximum term of two years, with due diligence refreshed at such intervals. The policies also require that consultants receive, acknowledge, are trained on and comply with the Corporation's Code of Ethics and Business Conduct. CRX-011 International Business Development Consultants applies to offset partners and brokers as well as consultants.

**CRX-014 Individual Conflict of Interest**, which applies to all Lockheed Martin employees and consultants, outlines activities that may constitute a conflict of interest, situations requiring disclosure, and the formal process for declaring a potential conflict of interest.

**CRX-025, Teaming Agreements** outlines implementation plans governing the identification of teammates and the negotiation, execution, performance, and termination of teaming agreements. Each agreement specifically requires performance of an antitrust analysis by Legal Counsel and compliance with the due diligence obligations.

**CRX-251 Charitable Contributions** defines spending limits and allocation, describes desired characteristics of recipients, and specifies that contributions must be documented, approved, transmitted and tracked.

**CRX-325, Business Travel** requires compliance with applicable laws and regulations, customer requirements, Lockheed Martin's Code of Ethics & Business Conduct and applicable policies and procedures, including compliance with U.S. Anti-boycott and Anti-Corruption Laws.

**CRX-327, Commercial Cards** explains when and why these tools are used for the payment of authorized expenses. The policy specifically prohibits use of commercial cards for any payments to a Public Official or for consultant services.

**CRX-454 Offset/Countertrade Commitments** explicitly addresses the corruption risks associated with offset contracting, including the risks presented by subcontracts and selling or trading offset credits. The policy explains the process for obtaining approval for offset commitments and shows who within the company is responsible for approving different types of offset commitments.

**CRX-526, Corporate Aircraft** describes the process for using corporate aircraft, procedure for scheduling, and associated responsibilities. The policy specifies required approvals to transport any non-employee, including Public Officials, on corporate aircraft.