



GUIDING THE WAY

# Code of Ethics and Business Conduct



Technologies



# CONTENTS

## 4 Message From Our Chairman, CEO and President

## 5 Leadership Excellence

## 6 Our Values Guide the Way A Commitment to Our Code

- 7 Our Values
- 8 Our Code
- 9 Ethical Decision-Making Model
- 10 Seeking Advice and Raising Concerns
- 12 Handling Concerns and Investigations
- 13 Our Culture of Non-Retaliation
- 14 Respecting Our Code, Policies and the Law

## 15 Our Values Guide the Way With Our Customers and Other Business Partners

- 16 Producing Quality Products
- 16 Accurate Labor Charging
- 17 Working With the U.S. and Other Governments
- 18 U.S. Government Contracts
  - 18 Submissions of Claims to the U.S. Government
  - 18 Byrd Amendment
  - 18 Competing for Government Business
- 19 Truthful Cost or Pricing Data
- 19 Restrictions Regarding Employing Current and Former Government Personnel
- 20 Preventing Bribery, Corruption and Kickbacks
- 21 Exchanging Business Courtesies, Gifts and Hospitality
- 23 Avoiding Conflicts of Interest
- 24 Building Relationships With Suppliers
- 25 Competing Fairly
- 26 Complying With Global Trade Laws





## 27 **Our Values Guide the Way Within Our Company and With Each Other**

- 28 Maintaining a Safe and Healthy Workplace
- 29 Promoting Diversity, Inclusion and Respect in the Workplace
- 30 Avoiding Harassment
- 31 Preventing Discrimination
- 32 Protecting Employee Information and Privacy
- 33 Safeguarding Confidential Information
- 34 Guarding Classified Information
- 35 Securing Company Assets and Property
- 35 Preserving Intellectual Property
- 36 Using Company Information Systems
- 37 Keeping Accurate Business and Financial Records
- 38 Trading Securities Responsibly

- 39 Communicating Honestly and Carefully
- 39 Communications and Marketing Activities
- 39 Contact With the Media
- 39 Social Media

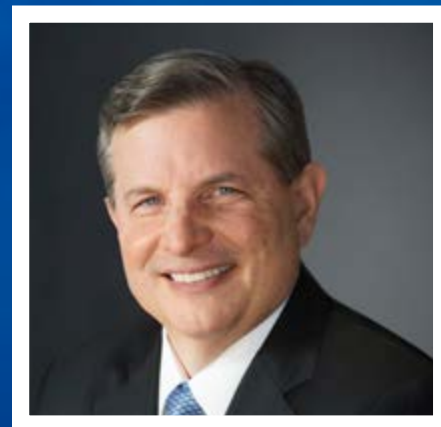
## 40 **Our Values Guide the Way in How We Operate in Our Communities**

- 41 Participating in Political Activities and Lobbying
- 42 Respecting Our Environment
- 42 Being Good Corporate Citizens

## 43 **How We Guide the Way**

- 43 Our Responsibilities
- 43 Management Responsibilities
- 43 Waivers

# MESSAGE FROM OUR CHAIRMAN, CEO AND PRESIDENT



Dear Colleagues:

As our company continues to evolve, grow and adapt to the changing marketplace, one thing that remains constant is our commitment to L3's core values. As a leader in our industry, it is imperative that we conduct ourselves with **INTEGRITY, EXCELLENCE, ACCOUNTABILITY** and **RESPECT** in everything we do. By adhering to the highest standards of professionalism, we strengthen our bonds with each other, our customers, our business partners and the communities in which we live and work.

Our Code of Ethics and Business Conduct program provides useful guidance for putting our values into practice in our daily work. Each one of us at L3, regardless of position or level of responsibility, as well as those who act on our behalf, are required to understand and comply with this Code. Professional resources are also available to provide direction should you encounter a situation not covered in the Code. I encourage each of you to read the Code every year and make use of these valuable resources whenever you have questions or concerns.

Another important step we are taking is the L3 Leadership Excellence model outlined on the next page. These are 12 qualities we look to our managers and leaders (including myself) to model as well as a framework for all employees to actively engage in. Those qualities I consider most important to making us a great company are courage, entrepreneurship, customer insight and teamwork.

L3 is known for its dedicated people, outstanding performance and ethical business practices. There is much we can accomplish when we work together and strive to be our best by following our ethical principles and leaning into leadership characteristics. It's these qualities that will carry us forward as an industry leader with a strong reputation and a commitment to delivering value to all stakeholders.

Sincerely,

A handwritten signature in blue ink that reads "Christopher E. Kubasik". The signature is fluid and cursive.

**Christopher E. Kubasik,**  
**Chairman, Chief Executive Officer and President**

# Leadership Excellence

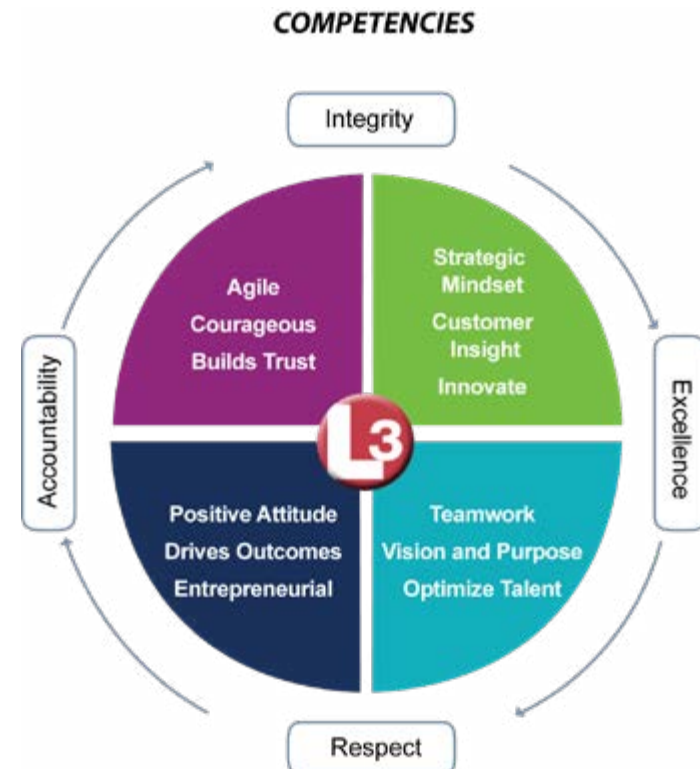
## CREATING A LEADER MINDSET

Strong leadership is central to driving L3's growth strategy. Grounded in our values, the Leadership Excellence model provides the competencies and

behaviors that exemplify what it means to be a successful leader at L3 and how each of us, at all levels, contribute to building a strong culture that enables us to compete and win.

Use L3's leadership model to support your professional development and unleash our individual and collective potential.

## THE L3 LEADERSHIP EXCELLENCE MODEL





A photograph of three L3 employees standing in a hallway. On the left is a Black man with a goatee, wearing a dark blue polo shirt with the L3 logo on the chest. In the center is an Asian woman with her hair pulled back, wearing a dark blue zip-up shirt with the L3 logo on the chest. On the right is a Black woman with short dark hair, wearing a dark blue polo shirt with the L3 logo on the chest. They are all smiling at the camera. The background is a blurred hallway with a door and a light fixture.

# OUR VALUES GUIDE THE WAY

## A Commitment to Our Code

# Our Values

## WHAT ARE VALUES?

Values, at their basic level, are the standards that guide our behavior.

Our values help **GUIDE THE WAY** and provide the foundation for our commitment to the highest level of ethical conduct, a commitment we take very seriously.

Our Code of Ethics and Business Conduct (“Code”) describes our commitment to these values and is our guide to ethical decision-making. Making ethical decisions is essential for how we work with each other within our Company, with our customers and other business partners and within our global community.



### INTEGRITY

We demonstrate integrity by operating honestly and fairly. We apply our values and principles to our daily business activities and make sure our actions always reflect the highest level of ethical conduct. We each take responsibility for knowing the laws and regulations governing L3 and meeting the Company’s ethical standards.



### ACCOUNTABILITY

Accountability signals our desire to make and keep commitments. Our reputation depends on our resolve to reliably and consistently deliver on our promises and to earn and keep the trust of our customers, shareholders, fellow employees and the community at large.



### EXCELLENCE

Our Company insists on excellence. Our customers, fellow employees, communities and shareholders expect and deserve superior performance in our products and services and in the way we conduct business every day. Maintaining a level of excellence that is appropriate to our position as a global leader depends on an individual commitment from each of us to act with integrity, accountability and respect any time we represent the Company.



### RESPECT

Acting with respect is fundamental to our strength as an organization. We treat customers, suppliers, outside parties and one another with dignity, fairness and courtesy. We support an inclusive culture where diversity in people and perspective is valued. We cooperate across organizational boundaries, focusing on adding value and earning the trust of our teammates.

# Our Code

We deliver superior performance through our commitment to ethical business conduct, which ultimately is the foundation for our success as a company. Our Code was established to help **GUIDE THE WAY** to this success and applies to everyone who does business on behalf of L3, including employees, officers and members of the Board of Directors. We also expect all third parties with whom we contract, including agents, suppliers and contractors, to act in accordance with the

principles outlined in this Code when conducting business on our behalf.

Everyone who works for, or on behalf of, L3 is expected to:

- ▶ Comply with the Code
- ▶ Make ethical decisions based on our values
- ▶ Demonstrate our values at all times

---

“ Our Company’s Values help us navigate the risk landscape and guide how we treat each other, our customers, suppliers and others. ”

—Lawrence V. Wasnock,  
Vice President and Corporate Ethics Officer





# Ethical Decision-Making Model

## GUIDING THE WAY

L3's Code of Ethics and Business Conduct is designed to guide us, though it cannot address every issue that we may encounter. When we are confronted with a dilemma or unclear decision and are not sure how to respond, we should consider this decision-making model to **GUIDE THE WAY**.



If the answer to any of these questions is “no,” do not do it. If we are uncertain, then we should consult our supervisor, our manager, another Company resource or our local Ethics Office for further guidance.

# Seeking Advice and Raising Concerns

If we ever have questions about the Code or concerns about a possible violation, it is imperative that we raise them. The sooner we raise our concerns, the sooner the Company can help us resolve them. We may report our concerns in several ways:

- ▶ Our supervisor or another member of the management team
- ▶ Human Resources
- ▶ A Subject Matter Expert in Contracts, Legal, Quality, Finance, Audit, Security, etc.
- ▶ Our local Ethics Office

▶ L3 Corporate Ethics Office

- ▶ Helpline: 1-877-L3-CODE-9 (1-877-532-6339)
- ▶ Website: [www.L3code.com](http://www.L3code.com), which is available in many different languages
- ▶ Email: [Ethics@L3T.com](mailto:Ethics@L3T.com)
- ▶ Mail:  
L3 Technologies, Inc.  
Corporate Headquarters  
Attention: Corporate Ethics Office  
600 Third Avenue  
New York, NY 10016



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

Employees covered by a Collective Bargaining Agreement (“CBA”) may be required to report certain issues in accordance with procedures specified in the CBA. For example, issues related to pay, benefits and working conditions may be subject to the applicable grievance procedures. Consult your CBA.



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

### Mandatory Reporting Obligations Under U.S. Government Contracts

We are required by the Federal Acquisition Regulation (“FAR”) to disclose credible evidence of certain violations of law involving fraud, conflicts of interest, bribery or gratuities, in addition to other issues in connection with the award, performance or closeout of U.S. Government contracts and subcontracts. To comply with these obligations, we must immediately report any issues that could potentially constitute a violation of criminal or civil law, or a significant overpayment on a government contract or subcontract, to the Ethics Office. We may also report these matters through the various Ethics resources, if we prefer to remain anonymous.

**REMEMBER:** Reporting these issues is mandatory.



## GUIDING THE WAY

For concerns about accounting, internal controls, auditing or financial reporting, you may also contact the Audit and Ethics Committee of the Board of Directors:

L3 Technologies, Inc.  
Corporate Headquarters  
Attention: Audit and Ethics Committee  
600 Third Avenue  
New York, NY 10016







## SHINING THE LIGHT ON ADDITIONAL INFORMATION

### Government Investigations and Inquiries

Given the highly regulated environment in which we operate and the nature of the work we do, it is possible that government officials will contact L3 employees directly as part of an inquiry or investigation in an effort to obtain information. It is imperative that employees deal with government officials cooperatively and honestly. To ensure that our Company's interests are protected, it is also important that we respond to investigations and inquiries in an organized and thorough manner. For this reason, employees are not authorized to present themselves as L3 representatives to government authorities, or to release any information on behalf of L3, unless specifically authorized by the Company. If a government official or law enforcement officer contacts you to request L3 information or L3's position on any matter, you must contact the L3 Legal and Security Departments immediately following such contact.

# Handling Concerns and Investigations

Following the Code is mandatory. L3 takes all reported concerns seriously. All matters brought to the Ethics Office will be evaluated to determine if further action is warranted. The Company will make every reasonable effort to keep your identity confidential. To assist in maintaining confidentiality and to help ensure a thorough and fair review and evaluation of the matter, you should refrain from discussing the matter with co-workers or anyone else. If you choose to remain anonymous, you will be given an identification number that will allow you to follow up at your discretion for a status update.

If you raised a concern with your supervisor or another resource, you can expect that they will follow up with you within a reasonable time. While they may not be able to disclose specific details, they will likely be able to provide a high-level summary.

Those individuals who fail to follow the Code will be subject to disciplinary action, up to and including termination. Disciplinary action may be taken not only against those who authorized or participated directly in the violation, but also against those who deliberately failed to report a violation.

**REMEMBER:** When reporting anonymously, follow up periodically to check for communications regarding your concern which may include follow-up questions from the investigator. Your participation is important to support a thorough and fair investigation.

# Our Culture of Non-Retaliation

Any one of us who comes forward with concerns plays an important role in maintaining a healthy, respectful and productive workplace and in protecting our colleagues, shareholders, customers, suppliers and community. Raising

concerns helps us address problems early—before potentially more serious consequences develop. Retaliation in any form against an individual who, in good faith, reports a violation of the Code or of the law, or assists in the investigation of a reported

concern, is a serious violation of this Code and of the law. We each have an obligation to create an environment free of retaliation. It is, therefore, our policy to strictly prohibit any form of retaliation against anyone who raises a concern.

---

“ At L3, it’s in our DNA to act with the highest standards of integrity when ethical decisions arise. This guiding principle—along with our core values and steps we’re taking to build our leadership culture—are powerful contributors driving our future value in a changing marketplace. ”

—Melanie Heitkamp,  
Senior Vice President and  
Chief Human Resources Officer



# Respecting Our Code, Policies and the Law

This Code summarizes our important policies and procedures. Detailed guidance on these topics can be found in our L3 Policies, which are available on our intranet site or through your supervisor.

We operate in a highly regulated business environment both domestically and in countries around the world. Our international business activities may be subject to both United States Government and host country laws and regulations. There are addenda to this Code that provide information on the laws and regulations of the various countries where we operate. We must understand that the Code and its addenda do not address all of the laws and regulations that may be applicable in the countries where L3 does business. It is, therefore, important that we seek guidance from the L3 Legal Department or our Ethics Office whenever we are uncertain of how local laws may affect our work.

---


**“ Our commitment to the highest ethics and integrity is essential to our success. Moreover, we work in a highly regulated environment and take our responsibilities for compliance and transparency very seriously. ”**

**—Ann D. Davidson,  
Senior Vice President and Chief Legal Officer**





# OUR VALUES GUIDE THE WAY WITH OUR CUSTOMERS AND OTHER BUSINESS PARTNERS

A photograph of two pilots in a cockpit, viewed from behind. They are wearing white uniforms and headsets, looking out at a simulated landscape on the cockpit windows. The instrument panel is visible between them.

As a trusted partner to our customers and business partners around the world, we are all committed to **EXCELLENCE** in delivering quality products and services. We all hold ourselves **ACCOUNTABLE** for being aware of and following the rules that apply to the work we do. In all of our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including our agents and other business partners.

## GUIDING THE WAY

If we have any questions regarding time charging processes or procedures, we must obtain clarification from our supervisor, the Contracts or Finance Department or the L3 Ethics Office.

# Producing Quality Products

Delivering quality products and services that meet our customers' requirements is critical. We are a recognized leader in our industry for innovation, quality, responsiveness and value. Long-term customer relationships are built through superior performance.

To ensure we meet our quality commitments to our customers, we:

- ▶ Are committed to the achievement of high quality and excellence in all of our products and services
- ▶ Strive to do each job right the first time
- ▶ Prepare all required reports accurately and completely
- ▶ Comply with contract specifications, including design requirements, inspections and tests

- ▶ Only use materials and processes conforming to the quality levels specified in each contract
- ▶ Use substitute materials or processes only if they have been approved in writing and in advance by the customer's authorized representative
- ▶ Do not knowingly misrepresent, in any way, the condition or status of services or products offered for inspection, testing or delivery

**REMEMBER:** We strictly adhere to a robust set of quality standards and always strive to satisfy our customers' expectations. Refer to L3's policies related to continuous improvement and support the Company's continuous improvement initiatives as a means of improving customer satisfaction and L3's competitive position.

# Accurate Labor Charging

Honest and accurate time reporting is mandatory. We are all responsible for understanding and ensuring the accuracy of all applicable labor

reporting. This means, for example, that you must charge your time accurately to the contract or contracts on which you are working.

# Working With the U.S. and Other Governments

We should expect heightened scrutiny regarding compliance with the rules and regulations applicable to companies doing business with the U.S. and other governments. Accordingly, we must act with the highest levels of **INTEGRITY** and ensure that our products and services are delivered and administered in a manner that fully complies with applicable laws, regulations and our contracts.



---

“ At L3, performing our jobs with the qualities of integrity, mutual respect and the highest ethical standards underpins creating value for all of L3’s stakeholders, including our customers, investors and our fellow employees. These qualities provide the foundation for our success. ”

—Ralph D’Ambrosio,  
Senior Vice President and Chief Financial Officer



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

The laws and regulations applicable to government contractors apply both when L3 is acting as a prime contractor and as a subcontractor at any tier. Consultants and subcontractors that are hired by our Company to perform work related to a government contract or subcontract must also adhere to government contracting rules.

Violations of the laws and regulations related to working with governments can lead to substantial fines and penalties, as well as possible suspension or debarment from future contracting. It is critically important that we all understand and follow the unique rules related to working with governments.



## GUIDING THE WAY

If we receive any information that might be construed as presenting a conflict with the laws, regulations and rules that apply to activities related to contracting with the U.S. Government, or if we have any questions about these laws and regulations, we should contact the L3 Legal Department or the Ethics Office.

# U.S. Government Contracts

The rules for doing business with the U.S. Government are complex and stricter than doing business with commercial customers. We comply with all the laws, regulations and rules that apply to activities related to contracting with the U.S. Government.

## SUBMISSIONS OF CLAIMS TO THE U.S. GOVERNMENT

The law provides for significant damages and penalties for any government contractor who knowingly submits false claims to the government. “Knowingly” means:

- ▶ Claims that are intentionally inaccurate
- ▶ Claims that are recklessly submitted without verification that the work was performed in compliance with the requirements
- ▶ Claims submitted without verifying the information is accurate

**REMEMBER:** The laws and regulations associated with doing business with the government are varied and complex. In all circumstances, we must ensure full compliance with applicable requirements and we must carefully review any claims for payment prior to submission.

## BYRD AMENDMENT

This law prohibits the use of contract payments to pay any person for influencing, or attempting to influence, officials of the executive or legislative branches of the U.S. Government (including members of Congress and their staffs) in connection with the award or modification of U.S. Government contracts. Any questions about the propriety of payments should be raised with the L3 Legal Department.

## COMPETING FOR GOVERNMENT BUSINESS

The Procurement Integrity Act provides a series of prohibitions designed to protect the **INTEGRITY** of the procurement process by ensuring that competitors for government contracts compete on a level playing field. This is done by safeguarding access to competitive information and imposing post-employment restrictions on certain current and former government employees. Specifically, during a competition, the Act prohibits government officials from disclosing to L3, without written authorization, any other contractor’s bid or proposal information or the government’s internal source selection information. As L3 employees, it likewise prohibits us from improperly seeking or obtaining those types

of information. These prohibitions also restrict employment discussions with current or former U.S. Government personnel involved in competitions in which L3 has an interest.

### TRUTHFUL COST OR PRICING DATA

All cost or pricing data in support of our proposals must be accurate, complete and current as of the date of final agreement on price. Cost or pricing data are defined very broadly by law and can include information we have developed or received even if we do not use it in a proposal. Whether we are the contract negotiator, the cost estimator or the person responsible for furnishing data to the cost estimator, we must ensure that the data meets the Federal Acquisition Regulation (“FAR”) requirements.

### RESTRICTIONS REGARDING EMPLOYING CURRENT AND FORMER GOVERNMENT PERSONNEL

There are a series of laws and regulations that limit the ability to discuss employment or consulting opportunities with individuals who are currently employees of the U.S. Government. In general, the applicable laws and regulations prohibit any government contractor from gaining a competitive advantage or obtaining “inside” government information from government employees by engaging in employment discussions.

Similarly, there are strict prohibitions on the work that certain former government personnel may do for L3.



## GUIDING THE WAY

If there is ever a question as to whether information is cost or pricing data that must be disclosed to the U.S. Government, we should seek advice from the Finance, Contracts or L3 Legal Departments. Any doubts should be resolved in favor of disclosure.

## GUIDING THE WAY

The restrictions regarding employing current and former government personnel are complicated. It is critical that we consult L3’s policies related to this topic before engaging in employment discussions with current government employees or assigning work to former government employees. The L3 Legal Department, Human Resources Department or Ethics Office are also available if further clarification is needed.

## GUIDING THE WAY

L3’s policies related to anti-bribery, anti-corruption and compliance with the Foreign Corrupt Practices Act provide additional information that we all must understand and strictly adhere to. If we have questions or a reason to believe that a bribe or kickback has been offered or accepted, we must immediately contact the L3 Legal Department, the Anti-Bribery Compliance Department or the Ethics Office and report the situation.

# Preventing Bribery, Corruption and Kickbacks

It is never permissible to offer anything of value for corrupt purposes, such as obtaining favorable treatment with a current or prospective customer. L3 complies with all anti-bribery and anti-corruption laws around the world and prohibits anyone from offering, giving, soliciting or accepting any bribe or kickback, whether dealing with government officials, political parties or representatives of commercial organizations. “Bribes” does not mean just money, but anything of value, including

gifts, entertainment or other favors offered, given, solicited or received for an improper purpose. A “kickback” is providing or receiving something of value either to obtain or reward favorable treatment on a government contract or subcontract. There are serious consequences associated with failing to disclose a potential bribe or kickback. We expect this same **INTEGRITY** from all third parties, agents, and anyone else who works on the Company’s behalf.



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

As L3 employees, regardless of where in the world we live and work, we must all comply with the Foreign Corrupt Practices Act (“FCPA”) which prohibits offering or giving anything of value to a foreign official for the purpose of improperly influencing decision-making. It also prohibits unlawful political contributions to obtain or retain business overseas. Finally, the Act prohibits the use of false records or accounts in the conduct of L3’s business. Most countries in which L3 conducts business also have similar anti-bribery/anti-corruption laws, such as the U.K. Bribery Act, that we must comply with. We must be careful when retaining third parties to represent L3’s interests, as L3 can be held liable for the unlawful actions of such third parties. If you have any questions, you should contact the L3 Legal Department or Anti-Bribery Compliance Department.



# Exchanging Business Courtesies, Gifts and Hospitality

Our business transactions should always be free from even a perception that favorable treatment was sought, received or offered through gifts, favors, hospitality, entertainment or similar gratuities. This is particularly important when dealing with government employees. Our definition of business courtesies, gifts and hospitality is broad and includes tickets, fees or passes to sporting or cultural events, lodging, meals, door prizes and other items of value.

**REMEMBER:** We must avoid even the appearance of improper conduct. We are committed to protecting our reputation and complying with all laws and regulations.

While it is sometimes permissible and appropriate to exchange business courtesies, gifts or hospitality, we must all understand who we are interacting with and the related limitations.

## **GIFTS AND ENTERTAINMENT WITH U.S. GOVERNMENT REPRESENTATIVES**

The U.S. Government is our largest customer, and we must respect the special laws surrounding contracting with it. With few exceptions, U.S. Government agencies have strict prohibitions against their employees accepting any business courtesies. Therefore, except as otherwise permitted by law or regulation, we are prohibited

from offering or providing any business courtesy, including meals, entertainment, travel or lodging expenses to any U.S. Government employee or representative. Modest refreshments, such as soft drinks, tea, coffee and fruit, offered on an occasional basis in conjunction with business activities may be acceptable. If we deal with representatives of a particular federal agency, we are responsible for complying with that agency's standards of conduct. Where there is a question as

to a particular agency's standards of conduct, we must contact the L3 Legal Department in advance for guidance.

**REMEMBER:** Those who deal with U.S. state or local government officials are responsible for knowing and adhering to the rules that may apply to such state or local government employees. Generally, such officials are often under prohibitions similar to those of U.S. Federal Government employees.



# Exchanging Business Courtesies (continued)

## **GIFTS AND ENTERTAINMENT WITH EMPLOYEES AND OFFICIALS OF NON-U.S. GOVERNMENTS**

Employees and officials of non-U.S. Governments are subject to local laws and regulations, as well as their specific agencies or departments. Consult your location's policies, as well as applicable laws and regulations, prior to offering anything of value to such employees. If you have questions, consult the L3 Legal Department.

**REMEMBER:** Employees must understand and abide by the FCPA and applicable local anti-bribery and anti-corruption laws. Before offering or providing anything of value to non-U.S. public officials, we must obtain advance approval from the L3 Legal Department.

We must also be careful when retaining third-party intermediaries or agents to represent our interests outside the United States. L3 has strict approval requirements for engaging such parties as outlined

in the Company's policies related to anti-corruption due diligence requirements.

## **GIFTS AND ENTERTAINMENT WITH NON-GOVERNMENT PERSONS**

We may provide meals, refreshments or entertainment of reasonable value to non-government persons in support of business activities, provided:

- ▶ The business courtesy is not offered for favorable treatment.
- ▶ The courtesy does not violate any law, regulation or the standards of conduct of the recipient's organization. It is our responsibility to inquire about any prohibitions or limitations applicable to the recipient's organization before offering any business courtesy.
- ▶ The courtesy is consistent with marketplace practices, infrequent in nature and is not lavish or extravagant. It cannot cause

embarrassment or reflect negatively on our reputation.

## **SOLICITING AND RECEIVING GIFTS AND ENTERTAINMENT**

Our business transactions should always be free from even a perception that favorable treatment was sought, received or offered through gifts, favors, hospitality, entertainment or similar gratuities. While there are certain circumstances under which it is permissible to accept such items, we are expected to follow a course of action that complies with the following guidelines:

### **▶ SOLICITING GRATUITIES**

We may not solicit, directly or indirectly, for our benefit or for the benefit of another person, any gift, favor or other gratuity from a person or organization with which L3 does business or that seeks to do business with L3. Soliciting a gift, favor or other gratuity is strictly prohibited regardless of the nature or value of the item or service.

### **▶ GIVING AND RECEIVING GRATUITIES**

We may not accept business courtesies that constitute, or could be reasonably perceived as constituting, unfair business inducements or that could violate law, regulation or policies of L3 or its customers or could cause embarrassment or reflect negatively on our Company's reputation.

## **GUIDING THE WAY**

If we ever have any questions concerning gifts or entertainment, we should consult L3's policies related to business courtesies or the L3 Legal Department for guidance.

# Avoiding Conflicts of Interest

We are trusted to always act in the best interest of L3 and avoid conflicts of interest. A “conflict of interest” can arise when a personal interest conflicts, or appears to conflict, with the best interests of the Company. Personal interests include, but are not limited to, significant ownership in another company by you, your spouse, children, parents or in-laws. Although we are encouraged to engage in outside activities that do not conflict with L3’s business, we must always avoid even the appearance of a conflict of interest. Examples of possible conflicts of interest are described below:

**FINANCIAL INTERESTS** can become conflicts of interest if we have a significant financial interest in a current or potential supplier, customer or competitor.

**PERSONAL RELATIONSHIPS** can create conflicts of interest if:

- ▶ We have a close relationship with someone who works for a supplier, customer or competitor
- ▶ We manage, or are managed by, someone with whom we have a close relationship, including a romantic, marital or family relationship

**REMEMBER:** We cannot be employed by a supplier, customer or competitor unless we have received prior approval from the Corporate Ethics Officer in consultation with the General Counsel or, in the case of a Director or Executive Officer, the Board of Directors.

**CORPORATE OPPORTUNITIES** can become conflicts of interest if we take personal advantage of business opportunities discovered through the use of Company property, information or our position.

**OUTSIDE EMPLOYMENT** can create conflicts of interest if we:

- ▶ Are employed by, or serve as a director, of a supplier or customer
- ▶ Compete with the Company by consulting with or being employed in any capacity by a competitor or potential competitor
- ▶ Engage in outside activities which give access to third-party intellectual property that is the same or similar as that which L3 owns, is developing or has access

**REMEMBER:** Even if we believe we are acting properly, the relationship may be perceived by others as improperly influencing our judgment. This can damage morale and disrupt workplace productivity.



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

Conflicts of interest may include an organizational conflict of interest (“OCI”). OCIs may occur in connection with government contracts when activities being performed by the contractor can either result in an unfair competitive advantage for the contractor or the work may impair the contractor’s ability to be objective and not conflicted in performing the work. For example, if we drafted specifications for a government contract, we might be precluded from bidding on that contract. If we believe there is a potential OCI, we must consult with the L3 Contracts or Legal Department.

## GUIDING THE WAY

If we believe that we may have a potential conflict of interest, we should refer to L3’s policies and disclosure procedures related to this topic. Once disclosed, the Ethics Office can help navigate any potential issues.



# Building Relationships With Suppliers

We achieve success through collaborative efforts with our business partners. We honor all of our contractual obligations. We share our standards of business conduct with our suppliers and expect that they will reflect those standards when conducting business on our behalf.

## TREATING SUPPLIERS FAIRLY

We treat our suppliers and business partners with fairness, courtesy and respect. We comply with the terms and conditions of our agreements with our suppliers

and we honor our commitments. We are careful to protect the confidential and proprietary information entrusted to us by our suppliers and partners.

**REMEMBER:** We should not take unfair advantage of anyone through manipulation, concealment, abuses of privileged information, misrepresentation of material facts or any other unfair practice.





# Competing Fairly

We are committed to competing fairly, with **INTEGRITY**, and conducting our business in compliance with all applicable competition and anti-trust laws. We compete vigorously and honestly.

We will not:

- ▶ Communicate with competitors to discuss prices, allocate markets, boycott customers or suppliers or limit production of services for anti-competitive purposes
- ▶ Make false statements about our competitors
- ▶ Receive or use our competitors' proprietary information, including pricing information, improperly

The marketplace requires gathering a wide range of information in a systematic (and legal) manner. This information provides an understanding of the industry as well as customer requirements for existing or potential products and services. However, we will not gather our competitors' or our customers' information by inappropriate means. We are committed to avoiding even the appearance of improper information gathering and therefore may not obtain, accept or receive:

- ▶ Any information from a customer, competitor or other source to which L3 is not clearly and legitimately entitled
- ▶ Information such as proposal prices, competitor pricing or technical data, proposal evaluations, internal government estimates or any

information marked by the U.S. Government or other government entity as "Source Selection Information" or similar markings

- ▶ Any information from a source labeled "Source Selection Sensitive," "Proprietary" or "Confidential"
- ▶ Confidential or Proprietary information in any form possessed by new hires from their prior employers
- ▶ A company's Proprietary or Confidential information made available by consultants or others who previously had a business relationship with that company

There are also strict rules against gaining access to information relating to U.S. Government procurements, which are discussed under the section "Competing for Government Business."

If you ever have reason to believe that the release or receipt of any information is unauthorized, or you are uncertain as to our right to use the information, do not copy, distribute or use it until the situation has been reviewed and resolved by the L3 Legal Department.

**REMEMBER:** It is equally inappropriate to obtain or attempt to obtain the Confidential and Proprietary information of our competitors. Under no circumstances may anyone introduce another company's Confidential or Proprietary information into our Company or its systems.



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

Fair competition is not just our Company standard. Most of the countries in which L3 conducts business have laws designed to promote free and open competition and to prohibit activities designed to restrain trade. For more information on fair competition, contact the L3 Legal Department.

## GUIDING THE WAY

We must avoid even the appearance of impropriety when engaging with and gathering information about our competitors. Consult the L3 Legal Department for guidance if you have a question as to whether specific conduct is appropriate.

## GUIDING THE WAY

If we have any questions about export or import compliance, we should refer to L3's policies on this topic, which outline the requirements for adhering to export and import laws and regulations.

We can also contact our local Empowered Official, Export Compliance Coordinator, L3's International Licensing Group or the L3 Legal Department for further information.

## GUIDING THE WAY

Before contracts are issued or individuals employed, we must comply with L3's policies related to hiring or using debarred or suspended individuals or entities.

# Complying With Global Trade Laws

We deliver our products, services, solutions and technologies to countries throughout the world. As a result, our activities are governed by international trade laws. We are committed to following applicable international trade laws, including those related to the below topics.

## EXPORTS AND IMPORTS

Any L3 product, service or technology that is created in one country and then sent across that country's borders can be considered an export. Exports include more than just the transfer of a physical item from one place to another; exports can also include the transfer of information via email or a face-to-face conversation with a non-U.S. citizen, even when in the United States. Export laws and regulations often restrict our sale or transfer of technical data, hardware and/or services. In addition to monitoring export activities, most countries also have regulations that govern the entry or import of products, services and technologies across their borders.

**REMEMBER:** There are serious penalties for violation of these global trade laws, including the loss of export privileges, as well as civil and criminal penalties.

## ANTI-BOYCOTT

As members of a U.S.-based company, everyone at L3, including our non-U.S. subsidiaries, must comply with U.S. laws pertaining to foreign boycotts. As part of the U.S. Anti-Boycott Act, it is unlawful to:

- ▶ Furnish information about our Company's (or any person's) past, present or prospective relationship with boycotted countries or blacklisted companies
- ▶ Pay, honor or confirm letters of credit containing boycott provisions

**REMEMBER:** In the event that you receive a request to participate in or support a foreign boycott, you should report it immediately to the L3 Legal Department, as all requests for boycott information must be reported to the U.S. Government.

## SANCTIONS, SUSPENSIONS AND DEBARMENTS

We may not conduct any government-related business with any individual or company that is currently suspended or debarred under U.S. Government laws and regulations.

A photograph of three diverse business professionals in a meeting. On the left, a young man with dark hair and a light blue shirt looks towards the center. In the middle, a woman with dark curly hair, glasses, and a white shirt is smiling and gesturing with her hands. On the right, an older man with grey hair and a white shirt is partially visible, looking towards the woman. The background is a bright, out-of-focus window.

# OUR VALUES GUIDE THE WAY WITHIN OUR COMPANY AND WITH EACH OTHER

The people of L3 are the Company's most valuable asset. Together, we combine our talents, ideas, experiences and diverse backgrounds to deliver the best solutions to our customers. We know that treating everyone we encounter with **RESPECT** and acting with **INTEGRITY** in all that we do is fundamental to our collective success as an organization.

# Maintaining a Safe and Healthy Workplace

We are committed to conducting operations and activities in a manner that provides and maintains safe and healthy working conditions, protects the environment and conserves natural resources. In meeting this commitment, it is L3's policy that no one shall engage in any conduct that violates any environmental, health or safety laws.

Pay close attention to safety risks and always be sure to:

- ▶ Never block fire exits, fire extinguishers or electrical panels with furniture or equipment
- ▶ Never disregard safety or environmental rules established in procedures or training
- ▶ Wear personal protective equipment as directed

- ▶ Promptly report workplace-related injuries, regulatory violations or unsafe conditions

**REMEMBER:** If any unsafe conditions are noticed, they should be immediately reported to your supervisor, a member of management or your Environmental Health and Safety ("EH&S") representative.



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

### A Workplace Free From Violence

As part of our commitment to safety, our workplace must be free from physical violence. Workplace violence takes many forms, such as:

- ▶ Threats of violence toward any person or Company facility
- ▶ Weapons or threats related to weapons
- ▶ Stalking
- ▶ Sabotage of property
- ▶ Suicide threats
- ▶ Any behavior that raises concerns about violence or risk to others
- ▶ Domestic violence affecting the workplace

**REMEMBER:** Unauthorized weapons are prohibited in the workplace and L3 takes threats very seriously. If you witness or become aware of any possible violent threats, contact your local Principal Security Official immediately.

### A Workplace Free From Substance Abuse

The use of illegal drugs, unauthorized prescription drugs or alcohol abuse can create serious safety risks. The possession, sale or use of illegal drugs and/or unauthorized prescription drugs, or being under the influence of such drugs on Company time, property or at Company-sponsored events is prohibited.

We prohibit the consumption of alcohol on Company premises or when conducting Company business, except when consumed in moderate amounts during approved business events. In any case, all employees are held accountable for ensuring that their performance and judgment are unimpaired by alcohol during working hours.



# Promoting Diversity, Inclusion and Respect in the Workplace

We appreciate that every individual in our Company brings a unique background and perspective, as well as a unique set of abilities. Leveraging our diversity creates innovative solutions and enhances our delivery of world-class customer service.

We treat people with dignity, fairness and courtesy. We create an inclusive environment

that is focused on a common purpose and where diversity in people and perspectives is valued. We cooperate across organizational boundaries, focusing on adding value and earning the trust of our teammates. We achieve success through collaborative efforts and a commitment to achieving common, defined objectives. We seek to

provide a work environment where everyone can perform effectively and achieve their full potential.

**REMEMBER:** We are all responsible for creating a climate of trust and **RESPECT** and for promoting a productive workplace environment.



## GUIDING THE WAY

If we have additional questions about respect in the workplace or preventing harassment, we should refer to L3's policies related to these topics or we should contact the Human Resources Department.

# Avoiding Harassment

L3 will not tolerate harassment of any type, including physical, emotional, sexual or that which targets any protected category. This extends to co-workers, suppliers, customers and anyone else who does business with the Company. This prohibition also extends beyond the workplace, to any work-related setting, such as business trips, meetings and related social events, and on electronic media, including blogs, text and instant messaging, social media and message boards.

Harassment is contrary to our values, creates an offensive or otherwise harmful work environment, and interferes with work performance.

**REMEMBER:** If you experience or witness any type of harassment, report it immediately to a supervisor, member of management, the Human Resources Department or the L3 Ethics Office.



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

Some examples of harassment include, but are not limited to:

- ▶ Bullying
- ▶ Sexual remarks, threats, gestures or requests for sexual favors
- ▶ Questions or conversations about sexual activities
- ▶ Unwelcome or inappropriate touching
- ▶ Verbal or physical threats of any type
- ▶ Texting, emailing or displaying pictures or objects that are sexually suggestive or demeaning to an individual's race, gender, sexual orientation, religion, disability, age or other personal characteristics
- ▶ Texting, emailing or making slurs, offensive remarks, jokes, gestures or slang expressions regarding race, religion, disability, pregnancy, age, national origin, sexual orientation or other personal characteristics

# Preventing Discrimination

As an equal opportunity employer, we are committed to treating all employees and applicants for employment with **RESPECT** and dignity and maintaining a workplace that is free from unlawful discrimination. We recruit, hire, develop, promote, discipline and provide other conditions of employment without regard to race, color, religion, national origin, gender (including pregnancy, childbirth, breastfeeding or other related medical conditions), age, disability, genetic disorder, predisposition or carrier status, marital or partnership status, veteran status, sexual orientation, gender identity or expression. We also provide reasonable accommodations to qualified employees and applicants as required by law.

**REMEMBER:** We are all expected to promote a culture and environment of **RESPECT** and avoid any behavior that could have a negative impact on morale, including actions and behaviors that could be viewed as forms of discrimination.

## GUIDING THE WAY

If we have additional questions about discrimination in the workplace, refer to L3's policies relating to this topic or contact the Human Resources Department.

“Great corporate culture is one of the hardest and most important, rewarding things to build within a company, as it uplifts and ennobles our everyday efforts to gain reward not only in what we have done but who we have become while accomplishing our work.

Ethical behavior is the foundation of building something great and the fastest, surest route to a company's success. When there is mutual respect, courage, integrity and transparency, there is trust. With trust, there is speed. So our ability to be agile, adaptable and make excellent, rapid decisions relies on the firm grounding of ethics.

We rely on you to continue to champion the strong ethical culture that L3 has always been known for.”

—Heidi R. Wood,

Senior Vice President, Corporate Strategy and Technology



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

Personally Identifiable Information (“PII”) is any information that we collect or process that can be used to identify, locate or contact an individual or entity. Some examples of PII include, but are not limited to:

- ▶ Identification numbers, such as Social Security number, passport number and driver’s license number
- ▶ Financial information and credit card numbers
- ▶ Address
- ▶ Date of birth
- ▶ Mother’s maiden name
- ▶ Medical records

We take our responsibilities to protect the privacy of PII very seriously, and follow all applicable international, federal, state and local laws.

# Protecting Employee Information and Privacy

L3 is committed to protecting the privacy of the data placed in our trust. Only employees who are authorized and who have a work-related reason may access personal information such as Company personnel and medical records. Personnel and medical records should contain only information necessary for employment-related purposes. Many countries have strict laws protecting personally identifiable information related to our employees and others, and we must protect this information.

## GUIDING THE WAY

If we have additional questions on personal information, refer to L3’s policies on this topic. In the case of any known or suspected data breaches, we must immediately report the matter to the local Principal Security Official.





# Safeguarding Confidential Information

At L3, we own, create and have access to a significant amount of confidential, proprietary, government-classified and export-controlled information and intellectual property. We must protect and properly handle information in written, electronic or any other form, whether obtained from or relating to L3, its suppliers, customers or other third parties. We should not disclose or use

any of this information without proper authorization. This obligation lasts during our entire employment and at all times thereafter.

When our Company executes confidentiality or non-disclosure agreements with a third party regarding information to be received by L3, we must all honor the terms of such an agreement.



## GUIDING THE WAY

Because of the extremely sensitive nature of our business, if information must be disclosed outside of our Company (for business or legal reasons), we must contact L3's Contracts or Legal Department in advance of the disclosure. They will assist in discussing and implementing proper protective measures before disclosure or use of the information.

## GUIDING THE WAY

If the work that we do puts us in a position where we handle classified information, we must take the necessary steps to protect this information. We only give individuals access to classified information if we have received prior approval, they possess the necessary clearance level and they have a “need to know.” In the case of any known or suspected security infraction or violation, we must immediately report the matter to the Vice President, Corporate Security via the local Principal Security Official.

## Guarding Classified Information

We are all responsible for understanding the sensitivity of the information entrusted to our care. On many occasions, the governments we work with give us access to classified information that requires special handling and a continuing obligation to protect it at all times. There are many laws and regulations that relate to the protection of

classified information, which are complex and vary by country and government agency. We must be familiar with these laws and regulations and closely follow the security guidelines detailed in our contracts or by the relevant government agency or country.



# Securing Company Assets and Property

We must protect all assets of the Company at all times. Company assets can include:

- ▶ Physical assets, such as phones, computers, equipment and facilities
- ▶ Financial assets
- ▶ Intellectual property and other information assets, such as product designs, inventions, technical data, computer software and proprietary information

When working with the Company's data or proprietary information, we must be sure not to make any accidental or unauthorized disclosure. This means adhering to non-disclosure agreements, paying attention to and preserving Company proprietary markings, ensuring that all technical data and software submitted to a customer are marked with the correct data rights legends and not transmitting information by email unless it is appropriately encrypted or otherwise protected.

# Preserving Intellectual Property

It is equally important to protect L3's intellectual property, which includes confidential information and trade secrets as well as copyrights, patents and trademarks. This includes placing the proper markings on our proposals, as well as marking any data or software with the correct data rights legend specified in our contracts. Each of us is responsible for protecting L3's intellectual

property in accordance with laws and regulations. Additionally, we should not misuse anyone else's intellectual property. The laws and regulations in this area are complicated; therefore, we should contact the L3 Legal Department whenever questions arise.

---

## GUIDING THE WAY

When using a Company asset, we should always consider whether our actions are in the best interest of the Company. As a general rule, Company assets should be used for business purposes only. There might be situations where occasional personal use of Company assets is appropriate, such as to make a call to order lunch or to use the Internet to review a train schedule. This type of use is appropriate as long as it is neither excessive nor disruptive to the workplace.

---

## GUIDING THE WAY

For answers to specific copyright questions, refer to L3's policies related to this topic.



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

We should be mindful that communications taking place over the Company's information systems are not private and the Company cannot guarantee confidentiality. L3 reserves the right (where legal to do so) to monitor or make records of all such communications to verify compliance with policies or for other legitimate business reasons.

# Using Company Information Systems

Our information systems are critical to our day-to-day business activities and we must use them responsibly. This means always putting L3's interests first to ensure that these systems operate as they should. In order to protect the Company's information systems:

- ▶ Use strong passwords, user IDs and building-access key cards to prevent security breaches
- ▶ Do not leave mobile phones or laptops unattended or in non-secure locations
- ▶ Secure computers and workstations
- ▶ Protect the confidentiality and security of our information systems
- ▶ Safeguard information systems from damage, including physical damage and virus-caused damage
- ▶ Immediately report the loss or improper use of, or access to, Company information systems, including mobile devices, phones, laptops, key cards, user IDs and passcodes to the Information Technology or Security Department

There are certain activities and uses of the Company's information systems that can threaten its integrity and are never acceptable. These include:

- ▶ Engaging in improper communications
- ▶ Visiting inappropriate Internet sites
- ▶ Distributing confidential information without authorization
- ▶ Installing unapproved hardware or software
- ▶ Conducting business unrelated to Company work

**REMEMBER:** When working at a government facility or when having authorized access to a government information system, we must understand and strictly follow all procedures and requirements for using the government's system.



# Keeping Accurate Business and Financial Records

We must maintain accurate and complete business and financial records. Inaccurate or incomplete records may violate laws and regulations and could lead to a host of adverse business consequences. Additionally, our record-keeping procedures are essential to ensure that all costs are properly charged and reported.

## ► FINANCIAL INTEGRITY

Honest, accurate and timely recording and reporting of our financial transactions is critical to our reputation. All transactions between L3 and outside individuals are entered in our books and records using local accounting standards and adjusted in accordance with U.S. Generally Accepted

Accounting Principles. All of our records must reflect each transaction fully and accurately, on a timely basis. If we have any reason to believe that a record is inaccurate, false or misleading, contact an appropriate Company resource, such as our supervisor, the Finance Department or the Ethics Office.

## ► DOCUMENT MAINTENANCE

Business records include formal records, such as financial information and government filings, and any other records created within the scope of our business. U.S. Government regulations require that we maintain and retain certain records for a specified period of time. If we have a question about whether or not to

maintain a record, consult L3's policies related to record retention and destruction or contact the L3 Legal Department.

## ► COMPLYING WITH LEGAL HOLDS

There are times when we must follow additional precautions with respect to maintaining records, such as in the event of government or internal investigations or legal proceedings. When we learn of such ongoing or pending matters, we must retain relevant records. If we have any questions about our responsibility to maintain records, contact the L3 Legal Department.

## ► SUBMISSION OF ACCURATE EXPENSE REPORTING

It is critical that all expense reports be completed accurately and in a timely manner. This includes the following key points:

- Charge all costs accurately to the correct charge number or contract
- Follow your local procedures for expense reporting
- Ensure all expenses are permissible by the terms of the contract

**REMEMBER:** It is critical to our reputation that our financial data and business records are current, accurate and complete.



# Trading Securities Responsibly

Protecting the confidentiality of material, non-public information is imperative to our reputation as a trusted business partner. Selling L3 stocks or any other securities on the basis of inside material information acquired through the course of employment at our Company is prohibited. “Inside material information” is any non-public information that a reasonable investor would consider important in making investment decisions.

We must never share inside material information with others, including family members, friends, suppliers, customers or even co-workers, without a legitimate business reason and management approval. It is also important to remember that

these restrictions apply not only to Company information, but also to inside material information about our suppliers or customers that you may learn of through your work at L3. Insider trading is illegal and violations are extremely serious and can have major consequences for the Company and the individual.

**REMEMBER:** Material information is any non-public information that a reasonable investor would likely consider important in making investment decisions and that has not been disclosed broadly to the public. It must be kept confidential.



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

Examples of inside material information include:

- ▶ Acquisition or divestiture discussions
- ▶ Changes in management structure or changes at the executive level
- ▶ Awards or cancellations of major contracts
- ▶ Development of new products, services or processes
- ▶ Financial information, such as corporate earnings



## GUIDING THE WAY

For more guidance on properly handling inside information, refer to L3's policies related to compliance with United States securities laws and security trading or contact the L3 Legal Department.

# Communicating Honestly and Carefully

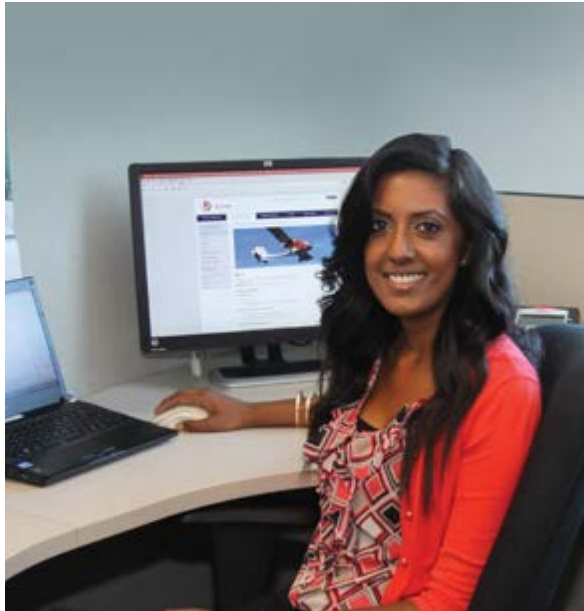
## COMMUNICATIONS AND MARKETING ACTIVITIES

We believe that lasting customer relationships are built on **INTEGRITY** and trust. We seek to gain fair advantage over our competitors through superior performance, service, manufacturing and marketing. We must never seek to win business through improper or questionable business practices.

Truthful and accurate communication about products and services is essential to meeting our responsibilities to our customers. We must be honest in marketing, in preparing bids and proposals based on current, accurate and complete cost and pricing data and in truthfully negotiating contracts.

## CONTACT WITH THE MEDIA

Our Company has appointed designated individuals in the Communications Department to respond to all media inquiries. Unless you have been approved as an L3 spokesperson, you may not engage with the media on behalf of L3. If you are contacted by the media, notify your local communications professional and the Corporate Communications Department immediately.



## SOCIAL MEDIA

Responsible use of social media is essential to safeguarding our Company's confidential information and reputation. Social media includes social networking sites, blogs, multimedia sites, and other information-sharing methods.



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

As an L3 employee, you must adhere to the following principles when using social media:

- ▶ Never disclose L3 Confidential or Proprietary information
- ▶ Never disclose customers' or suppliers' Confidential or Proprietary information
- ▶ Never represent yourself as speaking on behalf of L3, unless expressly authorized to do so

If you have any questions about the appropriate use of social media, consult L3's policies related to social media or contact your supervisor or the Ethics Office.





# OUR VALUES GUIDE THE WAY IN HOW WE OPERATE IN OUR COMMUNITIES

We know that the work we do has an impact on the communities where we live and work. We strive to conduct our business in a way that protects our society for future generations and demonstrates **EXCELLENCE** in corporate stewardship and responsibility.



# Participating in Political Activities and Lobbying

L3 respects personal participation in the political process by our employees, however, that involvement and participation in the political process must be on an individual basis, on our own time and at our own expense. Many countries prohibit corporations from donating corporate funds, goods or services (including employees' work time), directly or indirectly, to political candidates or parties.

**REMEMBER:** Because the laws in this area are complex, contribution of L3's funds or the use of its assets or facilities for the benefit of political parties or candidates and engaging with government officials regarding public policy and legislative matters anywhere in the world is prohibited, unless approved in advance by the L3 Legal Department.



## SHINING THE LIGHT ON ADDITIONAL INFORMATION

“Lobbying” involves communications with legislators, regulators or their staff in an effort to influence legislative or certain other administrative actions. Lobbying activities are subject to specific rules that cover a wide range of activities. It is important that all contacts with officials regarding public policy are coordinated through L3's Government Relations and Legal Departments, as all lobbying activities must be disclosed and carefully regulated.



# Respecting Our Environment

L3 is committed to conducting operations and activities in a manner that protects the environment and conserves natural resources. L3's policy is that no employee shall engage in conduct that violates environmental laws or regulations or is otherwise inconsistent with the health and safety needs of our employees and the environmental needs of our communities. L3 is also committed to the continuous improvement of its environmental management systems, its environmental, health and safety programs, and to the prevention of pollution. L3 facilities are engaging in a variety of sustainable activities to improve the health and safety of our employees and to protect the environment in the communities in which they operate.

# Being Good Corporate Citizens

Consistent with our ethical culture, L3 is committed to good corporate citizenship through its involvement in charitable organizations and community activities. We comply with all applicable laws and regulations, respect human rights, provide fair working conditions and prohibit the use of any forced, compulsory or child labor.

**REMEMBER:** As good corporate citizens, we believe sustainability efforts that include a well-run environmental, health and safety program along with conservation of resources make good business sense. Therefore, we will do our part to allow future generations to meet their resource needs.





# HOW WE GUIDE THE WAY

## Our Responsibilities

We all have a responsibility to use L3's Values to **GUIDE THE WAY** and we will:

- ▶ Understand the standards that apply to our jobs and take responsibility jointly with our supervisors to identify training needs
- ▶ Seek guidance from our supervisors and other appropriate Company resources whenever we have questions about this Code, Company policies or laws and regulations which apply to our responsibilities
- ▶ Discuss any concerns we have about possible violations of the Code, Company policies or laws and regulations with our supervisors or other Company resources listed under "Seeking Advice and Raising Concerns"
- ▶ Cooperate fully with any Company investigation
- ▶ Take responsibility for our own conduct. No one has the authority to make anyone violate our Code, and any attempt to direct or otherwise influence any employee to do so is itself a violation of our Code

## Management Responsibilities

L3 supervisors, managers, and others who lead have additional responsibilities to:

- ▶ Act in accordance with our values and model ethical behavior
- ▶ Emphasize the importance of the Code to all employees and consistently encourage open communication

- ▶ Play a proactive role in training employees on the Code and related topics, specifically by encouraging employee participation in training initiatives and identifying training opportunities
- ▶ Understand when to escalate business concerns and when to seek support from additional resources
- ▶ Communicate the Company's commitment to conducting business ethically and in compliance with all laws and regulations to third parties whom we oversee and ensure that their actions are consistent with our Values and with this Code

## Waivers

In certain rare situations, the Company may waive the application of this Code. Such waivers require the prior approval of the Corporate Ethics Officer and the General Counsel. Waivers involving Executive Officers or Board Members require the express approval of the Board of Directors. L3 will promptly disclose to our shareholders any such waivers granted to any of our Executive Officers or Board Members.

# Code of Ethics and Business Conduct Acknowledgment

---

I have read L3's Code of Ethics and Business Conduct ("Code") and, if applicable, Addendum. I understand and agree to abide by the Code. I realize that any violations of the Code may lead to disciplinary action.

Name (please print)

---

Employee identification number

---

Signature

---

Date

---

L3 location or outside organization

---





# Reporting Resources

We may report our concerns in several ways:

- ▶ Our supervisor or another member of the management team
- ▶ Human Resources
- ▶ A Subject Matter Expert in Contracts, Legal, Quality, Finance, Audit, Security, etc.
- ▶ L3 local Ethics Office
- ▶ L3 Corporate Ethics Office
  - ▶ Helpline: 1-877-L3-CODE-9 (1-877-532-6339)
  - ▶ Website: [www.L3code.com](http://www.L3code.com), which is available in many different languages
  - ▶ Email: [Ethics@L3T.com](mailto:Ethics@L3T.com)
  - ▶ Mail:  
L3 Technologies, Inc.  
Corporate Headquarters  
Attention: Corporate Ethics Office  
600 Third Avenue  
New York, NY 10016