



RESPECT OTHERS

DO WHAT'S RIGHT

PERFORM WITH EXCELLENCE

CODE OF ETHICS AND BUSINESS CONDUCT

SETTING THE STANDARD

LOCKHEED MARTIN 

UPDATED MAY 2026

SETTING THE STANDARD

Updated May 2026

Lockheed Martin Corporation

6801 Rockledge Drive

Bethesda, MD 20817

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Bethesda, MD 20817

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and Chief Executive Officer

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At Lockheed Martin, our values, *Do What's Right*, *Respect Others*, and *Perform with Excellence*, guide how we operate every day. They unite us as a team and build the trust we have with each other, our customers, our communities and the nations we serve.

Our "*Setting the Standard - Code of Ethics and Business Conduct*" provides clear guidance on how we conduct ourselves and make decisions on behalf of Lockheed Martin. I encourage you to read it and understand how to apply it in your daily work.

Every team member is held to the same high standards, regardless of role, location or seniority. Often, our expectations go beyond what local laws or customs require.

Although it can be difficult, it is important to speak up if you see behavior that doesn't align with our company values or our Code. You can do so with confidence due to our zero-tolerance policy against retaliation, harassment, discrimination and corruption.

Our reputation for integrity and excellence is built by the actions we take every day. Thank you for your commitment to upholding the values that define Lockheed Martin.

Jim Taiclet
Chairman, President and Chief Executive Officer



Uphold the Code

SET THE STANDARD

- Understand that the Code establishes our commitment to ethical business practices and often exceeds legal requirements.
- Remember that this Code does not replace policies or procedures; it sets the broad standards by which we hold one another accountable.
- Observe both the letter and the spirit of the laws and regulations that govern our business and the jurisdictions in which we operate.
- Cooperate in **investigations**.

Why It Matters

- Maintaining the trust of employees, our customers and stakeholders is vital to long-term success.
- Violating the Code may result in disciplinary action including termination.
- Leaders are accountable for actions that could influence employees to violate our Code.

Key Policies

- CPS-001 Ethics and Business Conduct
- CPS-718 Disclosures to the United States Government
- CRX-021 Internal Investigations

Investigations: You must notify the Legal Department, Ethics Office or Security if you learn that a government agency or any third party is conducting an investigation or asking for information pertaining to a suspected violation of law. We must never destroy or alter any documents or electronic records, lie to or mislead an investigator or obstruct the collection of information relating to an investigation or any legal action brought on behalf of, or against, the Corporation. To the greatest extent possible, we will cooperate with government agencies responsible for investigating suspected violations of the law.

- Our Code applies to Lockheed Martin employees, our Board of Directors, consultants, contract laborers and others representing or acting for the Corporation.
- Any **waiver** of the Code for executive officers or members of the Board of Directors may be made only by the Board or a Board committee and must be promptly disclosed to our stockholders on our website.

Waiver: This prevents waivers of the Code from being hidden from the public and complies with New York Stock Exchange (NYSE) requirements and similar rules under the Securities and Exchange Commission and the Sarbanes-Oxley Act of 2002.



Report Violations

SET THE STANDARD

- Act promptly to **report** violations of the Code, policy or a contract provision.

Why It Matters

- You may be the only person to see or suspect a potential violation.
- You have a duty to speak up when something doesn't seem right.
- Timely reporting allows issues to be resolved before they become larger issues.
- Failure to report may itself be a violation of the Code.

Key Policies

- CPS-001 Ethics and Business Conduct
- CPS-718 Disclosures to the United States Government
- CRX-021 Internal Investigations

Report: Report questionable or illegal conduct or suspected violations to your supervisor, manager, Human Resources, Ethics, Legal, Security, EEO, Environment, Safety, Health & Sustainability, Internal Audit or the **Audit Committee**.

Audit Committee: Concerns about accounting, internal controls or auditing matters and confidential or anonymous submission of questionable accounting or auditing matters may be transmitted to the Audit Committee of the Lockheed Martin Board of Directors. To raise a concern to the Audit Committee, contact the Corporate Ethics Office and the concern will be communicated to the Chair of the Audit Committee of the Board.



Ethics provides guidance and resources to help address concerns:

Call:
1-800-LM ETHIC (1-800-563-8442)

When calling from outside the U.S., first dial the origin country's exit code

Email: corporate.ethics@lmco.com

Mail: Corporate Ethics Office
Lockheed Martin Corporation
6801 Rockledge Drive, MP-211
Bethesda, MD 20817

Participate in Training

SET THE STANDARD

- Complete required Business Conduct Compliance Training, Ethics Awareness Training and other Corporate Mandatory Training.
- Leaders must ensure employee training is completed on time.

Why It Matters

- Training prepares you to recognize and effectively react to situations requiring ethical decision making.
- Learning about compliance and regulatory rules helps avoid violations and enhances understanding of job-related risks.

Key Policies

- CPS-001 Ethics and Business Conduct



Take Action

SET THE STANDARD

- Act with integrity and ask tough questions.
- Understand how your words and actions affect others.
- Use, and encourage others to use the Voicing Our Values techniques to take action, resolve issues and put our values into practice. Your Ethics Officer can provide support.

Why It Matters

- Employees often see early warning signs and problems. By taking action, issues can be addressed before they escalate.
- Unaddressed issues can snowball into systemic problems, litigation or regulatory oversight.

Key Policies

- CPS-001 Ethics and Business Conduct
- CPS-718 Disclosures to the United States Government
- CRX-021 Internal Investigations

Voicing Our Values Techniques



Ask Questions

Gather a Variety of Information



Obtain Data

Focus on Facts, Not Emotions



Talk to Others

Ask for Input from Trusted Sources



Reframe the Issue

Offer a Different Perspective



Report Violations

See Something, Say Something

Prevent Harassment and Discrimination

SET THE STANDARD

- Do not engage in conduct that offends, abuses, intimidates, degrades or threatens anyone.
- Help maintain a work environment that is free of physical, psychological, verbal harassment or other abusive conduct.
- Understand prohibited conduct by reviewing policy.
- Do not discriminate against employees or applicants on the basis of characteristics protected by applicable law or policy.
- Be an Upstander and take action when you witness, or become aware of, harassing or discriminatory behavior.

Why It Matters

- Harassment can occur in many forms inside and outside of the workplace.
- Excluding someone based on protected characteristics – simply by virtue of who they are – is against the law.
- Perpetuating stereotypes is a form of discrimination that can damage the culture and the performance of the Corporation.
- Targets, as well as witnesses, of harassment and discrimination may struggle to contribute to their full potential.

Key Policies

- CPS-003 Nondiscrimination and Equal Employment Opportunity
- CPS-564 Harassment-Free Workplace
- CRX-053 Workplace Security - Maintaining a Safe and Respectful Workplace Free from Threats and Violence



Do Not Retaliate

SET THE STANDARD

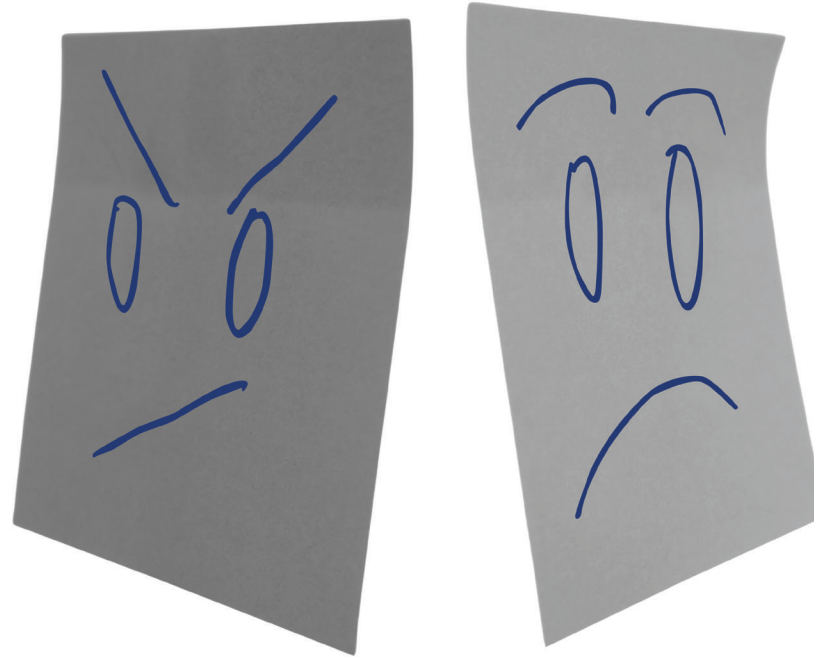
- Do not retaliate against anyone who makes an inquiry, participates in an investigation or reports misconduct.
- Report concerns in good faith which means you don't have to be right, but you believe the information you are providing is truthful.

Why It Matters

- Fear of retaliation can prevent employees from speaking up or taking action.
- Retaliation destroys trust and is not tolerated.
- If someone tries to stop you from reporting an issue, that person can be subject to disciplinary action including termination.

Key Policies

- CPS-001 Ethics and Business Conduct
- CPS-003 Nondiscrimination and Equal Employment Opportunity
- CPS-564 Harassment-Free Workplace
- CPS-575 Providing Reasonable Accommodations in the Workplace and for Applicants



You are legally **protected** from reprisals for reporting fraud, waste or abuse on government programs.

Protected: U.S. law also entitles each Lockheed Martin employee to certain rights and protections against reprisals if the employee discloses, to certain governmental officials or to the Legal Department or Ethics Office, information that the employee reasonably believes is evidence of gross waste, mismanagement, abuse of authority or violations of law related to U.S. government contracts, grants or funds; or evidence of a substantial and specific danger to public health and safety. Some non-U.S. laws also provide protection to employees and workers against retaliation for workers reporting breaches of public procurement, financial fraud, and other misconduct related to public resources.

Retaliation is the unfair or inappropriate treatment against an employee for reporting misconduct, filing a complaint, assisting another in making a complaint, participating in a company internal investigation or making an ethics-related inquiry.

Respect Privacy

SET THE STANDARD

- Collect, access, use and retain Personal Information/ Personal Data (PI/PD) only when there is a clear, legitimate business purpose and you have proper authorization.
- Use approved secure e-mail and file transfer methods when transmitting PI/PD outside the LM network (LMI).
- Include the required PI/PD legend in the subject line of any email that contains PI/PD.
- Do not share PI/PD on social media or collaborative workspaces.
- Disclose PI/PD to third parties only to the extent necessary to meet approved contractual, legal or business requirements.

Why It Matters

- Ensuring the confidentiality of employee records and information respects the privacy and dignity of all individuals.
- Safeguarding PI/PD builds trust with employees and customers.
- Improper handling of PI/PD may present risks to the workforce or legal implications.
- Privacy regulations differ by country.

Key Policies

- CRX-015 Protection of Sensitive Information
- CRX-016 Privacy - United States
- CRX-017 Personal Data Protection - Non-U.S.

PERSONAL INFORMATION/ PERSONAL DATA

Personal Information (PI) and Personal Data (PD) at Lockheed Martin is defined as any information that permits the identity of an individual to be determined. PI includes identifiable information for persons in the US; PD for persons in non-US countries.



Use Assets Responsibly

SET THE STANDARD

- Properly use and protect Lockheed Martin and customer **property** and assets and ensure their efficient use.
- Do not use customer assets for anything that is not specifically or contractually allowed/authorized.
- Do not send sensitive information to a personal email address or store sensitive information on a personal computing device.
- Use approved electronic items to store data in company/customer assets.

Why It Matters

- Our customers expect us to protect resources entrusted to us.
- Unauthorized use of company assets and information, as well as third-party information, can create risks to the Corporation and impact our financial obligations.
- Improper asset use can breach laws, violate contracts and/or cause deviations from company policies that may have significant unintended impacts to the Corporation and individuals.
- Misuse of U.S. Government assets can constitute a federal crime.



Key Policies

- CPS-007 Personal Use of Lockheed Martin Assets
- CPS-037 Proper Use of Computing and Information Resources
- CRX-014 Individual Conflict of Interest
- CRX-015 Protection of Sensitive Information
- CRX-156 Purchasing Cards (P-Cards)
- CRX-253 Social Media
- CRX-303 Electronic Messaging

Property: This includes electronic communication systems, information resources, materials, facilities and equipment.

Keep Accurate Business Records

SET THE STANDARD

- Honestly and accurately prepare all business and financial records.
- Conduct business transparently while not compromising proprietary or confidential information.
- Never misrepresent facts or falsify records.
- Promptly and accurately enter all business transactions into our books and business records.
- Make accurate disclosures to the public and our stockholders.
- Ensure that business and financial records, and any approved public communications, are comprehensive, fair, timely, accurate and easy to understand.
- Properly account for all costs, including labor, travel, material and any other expenses.
- Use commercial and purchasing cards for legitimate business purposes and expenses.
- Accurately record business and travel expenses and classify/allocate them to the correct codes for reimbursement.

Why It Matters

- Customers, regulators and investors expect us to maintain the integrity of our records.
- Complex business processes require accurate data to serve our customers.
- Keeping accurate records and reporting accurate financial transactions are critical to meeting legal and regulatory obligations.
- Our investors rely on accurate **public disclosures**.
- Inaccurate information submitted in proposals, business/travel expenses or labor charging violates policy and may also be illegal.

Key Policies

- CPS-011 Internal Control and Enterprise Risk Management
- CPS-020 Fair Disclosure of Material Information and Financial Information to the Investment Community and Public
- CPS-201 Release of Information
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-021 Internal Investigations
- CRX-156 Purchasing Cards (P-Cards)
- CRX-325 Business Travel
- CRX-327 Commercial Cards
- TVL-001 Business Travel Handbook



Public disclosures: Include reports or documents filed with the U.S. Securities and Exchange Commission and other regulatory authorities as well as other public communications made by the Corporation, including external presentations.

Protect Sensitive Information

SET THE STANDARD

- Use, store and protect **Sensitive Information** in accordance with applicable requirements.
- Obtain proper authorization before disclosing, receiving or contracting to share the Corporation's Sensitive Information with any third party.
- Transmit and store the minimum amount of information necessary for business purposes.
- Limit access of Sensitive Information to those with a need to know.
- Do not share Sensitive Information in unapproved forums.
- Obtain **proper approval** before publishing or making external presentations about Lockheed Martin, its customers or partners.

Why It Matters

- We generate, acquire and access vast amounts of valuable information each day. This data gives us, and our customers, significant business, technological and economic advantages, while also bearing implications for national-security interests.
- Wherever we do business, there are country-specific laws and regulations governing import/export issues and unique information handling and safeguarding requirements.
- Information protection requirements stay in effect even if your employment or engagement with the Corporation ends.

Key Policies

- CPS-022 Ethical Development and Use of Artificial Intelligence
- CPS-201 Release of Information
- CPS-310 International Trade Controls and Compliance
- CPS-569 Security
- CRX-002 Intellectual Property
- CRX-013 Government and Competitor Information
- CRX-015 Protection of Sensitive Information
- CRX-016 Privacy - United States
- CRX-017 Personal Data Protection - Non-U.S.
- CRX-019 Controlled Unclassified Information
- CRX-253 Social Media
- CRX-303 Electronic Messaging



Sensitive Information: This includes information in any or all of these categories: Personal Information (U.S.), Personal Data (Non-U.S.), Export Controlled Information, Lockheed Martin Proprietary Information, Third-Party Proprietary Information, Attorney-Client Privileged Information and/or Attorney Work Product and Protected Information.

Proper Approval: To obtain approval, U.S. employees should visit the PIRA tool (Public Information Release Authorization System - <https://pira.us.lmco.com>.) Non-U.S. employees should contact Communications for the appropriate point of contact to review their materials.

Properly Handle Controlled Unclassified Information

SET THE STANDARD

- Safeguard, disseminate, disposition and mark Controlled Unclassified Information (CUI) in compliance with U.S. Federal law, regulations, policies, contract requirements and procedures.
- Do not share CUI unless a legitimate business/lawful government purpose exists. (For example, access to CUI is needed to meet contract performance requirements.)
- Resolve any real or apparent inconsistency between U.S. and international law relating to CUI, including statutes and regulations related to the protection of CUI.

Why It Matters

- Lockheed Martin is required to protect CUI when it is created or delivered under a contract to meet a performance obligation.
- The U.S. Government will generally determine whether the information created/developed, used or shared under a contract is CUI.

Key Policies

- CRX-015 Protection of Sensitive Information
- CRX-019 Controlled Unclassified Information



CUI

What is CUI?

Any information that is held or created by the U.S. government or is supplied by the U.S. government to a non-government entity such as Lockheed Martin or its subcontractors. It also includes information created under or included in a performance requirement of a contract, provided that a law, regulation or U.S. government-wide policy require that the information be protected.

Use Social Media Responsibly

SET THE STANDARD

- Use social media responsibly and take extra care to protect information about the Corporation, your colleagues, our customers and yourself.
- Evaluate the potential consequences before posting any information about your specific role at the company, a specific project, program, classified or non-public initiative to avoid unintended large-scale, uncontrolled dissemination of, or access to, the information.
- Do not post information that is proprietary, confidential, export controlled or otherwise sensitive to Lockheed Martin's business operations without prior approval. This prohibition is directed towards business operations not discussions related to employees' terms and conditions which is permitted under the National Labor Relations Act.
- Charge time correctly when using social media during work hours.



Why It Matters

- Lockheed Martin encourages communication and collaboration among its employees, customers, partners and others, but online behaviors and activities can have far-reaching and lasting consequences.
- Because of its transparency and broader audience reach, social media significantly heightens the need to communicate responsibly, particularly when an activity or behavior can be attributed not just to you, but to others, including other employees or even Lockheed Martin.
- If you share too many details about your work or personal life, suspicious or fraudulent personas may try to entice you into a conversation, leading to significant risks to you and/or the Corporation.

Key Policies

- CPS-201 Release of Information
- CPS-310 International Trade Controls and Compliance
- CPS-569 Security
- CRX-002 Intellectual Property
- CRX-013 Government and Competitor Information
- CRX-015 Protection of Sensitive Information
- CRX-016 Privacy - United States
- CRX-017 Personal Data Protection - Non-U.S.
- CRX-019 Controlled Unclassified Information
- CRX-253 Social Media
- CRX-303 Electronic Messaging

Accurately Charge Labor and Other Costs

SET THE STANDARD

- Follow all labor recording policies and procedures.
- Accurately record labor hours worked every day.
- Properly account for labor, travel, material and other costs.

Why It Matters

- Improperly charging time on customer contracts could be considered fraud.
- Excessive use of online collaboration tools or the Internet for non-work purposes could lead to labor mischarging.
- Inaccurate labor charging may result in discipline, termination and/or possible government action such as debarment for employees and leaders who have entered, approved (or directed) mischarged time.



Key Policies

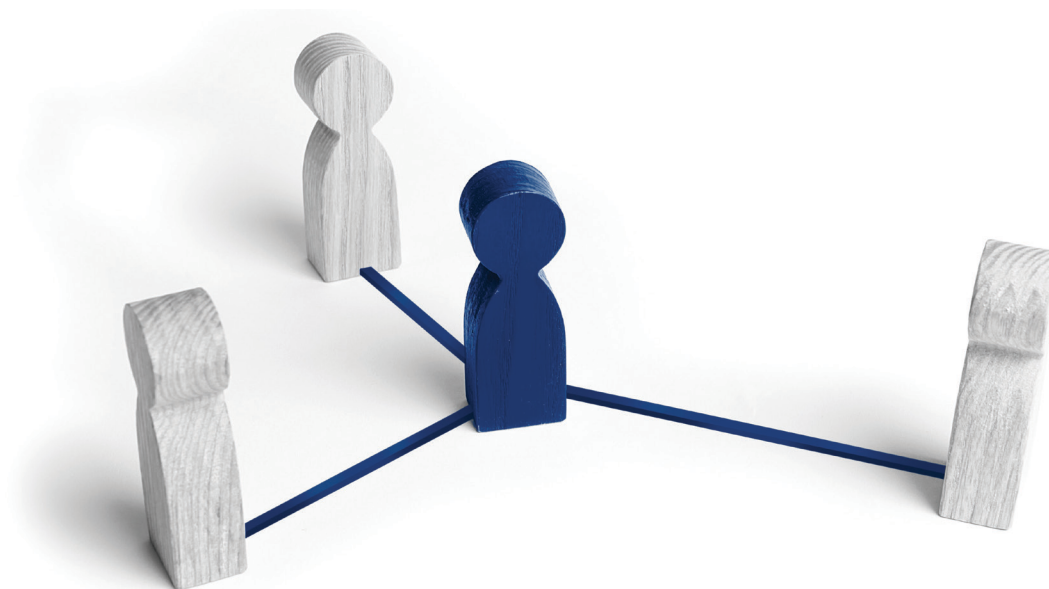
- CMS-505 Recording and Verification of Direct Labor Costs
- CPS-441 Cost Estimating/Pricing
- CPS-718 Disclosures to the United States Government
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-325 Business Travel
- CRX-327 Commercial Cards
- CRX-507 Exempt Employee Business Critical Extra Hours Worked
- CRX-510 Nonexempt Employee Compensation

Costs: These costs include, but are not limited to, normal contract work, work related to normal contract research and development and bid and proposal activities. This means that transactions between the Corporation and outside individuals and the organizations are accounted for and executed in accordance with generally accepted accounting practices and principles in the United States, and in the countries where we do business.

Avoid Conflicts of Interest

SET THE STANDARD

- Be fair and impartial in all business dealings and put Lockheed Martin's interests ahead of personal ones.
- Avoid actual conflicts of interest and any activities that create the appearance of a conflict.
- Do not use company contacts, position in the Corporation, its property/information for personal gain.
- Comply with all laws governing the hiring or use of current/former government employees, including military personnel.
- Abide by any role or responsibility restrictions that may be applicable to former government employees.
- Identify, neutralize or mitigate Organizational Conflicts of Interest to prevent unfair competitive advantage or bias.



Why It Matters

- Promptly disclosing any possible conflicts of interest ensures that an independent assessment can be conducted and appropriate mitigations applied.
- Conflicts of Interest can damage our competitive position and reputation.
- There are rules for contacting or negotiating with current government employees to discuss their potential future employment or their service as consultants or subcontractors.
- Failure to properly screen post-government employment restrictions and new business opportunities could result in disqualification or loss of business.

Key Policies

- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-010 U.S. Business Development Consultants
- CRX-011 International Business Development Consultants
- CRX-013 Government and Competitor Information
- CRX-014 Individual Conflict of Interest
- CRX-014A Conflict of Interest - Government Employment
- CRX-014B Conflict of Interest - Third Party Employment and Relationships
- CRX-014C Conflict of Interest - Family and Other Significant Relationships
- CRX-014D Personal Conflicts of Interest Arising From Work on Particular U.S. Government Contracts
- CRX-014E People with Organizational Conflict of Interest Restrictions

Do Not Engage in Insider Trading

SET THE STANDARD

- Do not engage in insider trading. This means you must not:
 - Trade the securities of any company (including Lockheed Martin) while in possession of material, nonpublic information (MNPI).
 - Encourage or “tip” anyone to trade on MNPI.
 - Disclose MNPI to others; including fellow Lockheed Martin employees, unless you are expressly authorized to do so.
- Be aware that the terms “securities,” “trading,” “material” and “nonpublic” have extensive and complicated legal definitions.



Why It Matters

- Confidence that trades in securities are based on publicly available information underlies our investors' trust in us and the public's trust in financial markets.
- If you learn of important information related to Lockheed Martin or a third party before the general public knows, there's a possibility it could be considered MNPI.
- You are responsible for ensuring that you do not share MNPI with family, other Lockheed Martin employees or third parties without express authorization, and you can be held liable for the actions of anyone with whom you do share it, even if you don't trade yourself.

Key Policies

- CPS-020 Fair Disclosure of Material Information and Financial Information to the Investment Community and Public
- CPS-722 Compliance with United States Securities Laws

Securities: Securities include stock (common and preferred), restricted stock units, employee stock options, bonds, notes, debentures, put or call options or similar instruments.

Trading: Trading includes all transactions in securities, including fund transfers or fund reallocations into or out of the Lockheed Martin stock fund in your savings, benefit or deferred compensation plans; any purchase or sale of common stock (including the sale of shares received from vested restricted stock units); gifts of Lockheed Martin securities if the value of the gift is established for tax purposes at the time the gift is made; and the exercise of employee stock options. It also includes trades executed pursuant to limit orders, even if these were placed prior to your coming into possession of material, nonpublic information.

Material: Information is “material” if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to trade a security. Both positive and negative information can be “material.”

Nonpublic: Information is considered “nonpublic” until it is widely disseminated. This means it has been in the news or released in the form of an official announcement and enough time has passed in the open market, privately or in company plans for the information to be assimilated by the general public (typically the next business day).

Ensure the Quality and Safety of Our Products and Services

SET THE STANDARD

- Identify and adhere to policies and procedures that ensure Quality, Mission Success and System Safety Engineering throughout the product or service lifecycle.
- Develop and deliver high-quality products and services that meet all applicable quality and safety standards for their intended use.
- Implement, follow and execute disciplined systems to measure performance and consistency.
- Seek to continuously advance safety and quality in the design and manufacture of our products and services.
- Notify leadership if something does not conform with the expected standards.
- Take all quality and system safety concerns, whether raised internally or externally, seriously and address them appropriately.



Why It Matters

- Quality assurance processes detect and correct defects to ensure delivery of products with acceptable levels of safety risk and services that meet all contractual, legal and regulatory requirements.
- Consistently high-quality, safe deliverables reinforce confidence in our products and strengthen relationships with customers.

Key Policies

- CPS-002 Quality, Mission Success, and System Safety

Use Artificial Intelligence Responsibly

SET THE STANDARD

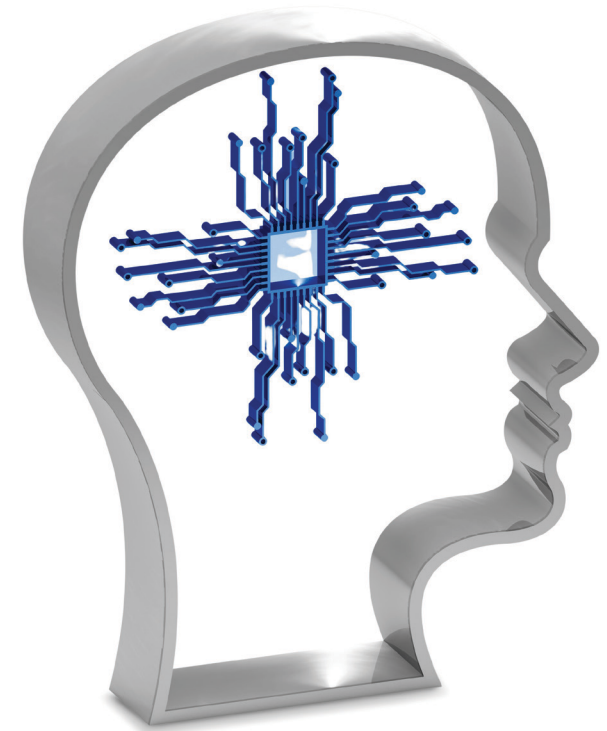
- Procure, develop and use Artificial Intelligence (AI) in accordance with our values, policies and procedures.
- Follow our AI Ethics principles when developing capabilities in related areas such as machine learning, data analytics and data mining initiatives.
- Internal AI tools, such as LMNavigator, should be favored over external AI tools.
- Use only AI tools that are approved for the appropriate type(s) of sensitive information you are handling.
- Review all AI-generated content to ensure accuracy, appropriate markings and appropriate restrictions on internal and external use and distribution.
- Do not enter, upload or otherwise process corporation, customer, personal or partner sensitive information in public/external AI platforms.
- Comply with the applicable acceptable use policy and/or Code of Conduct when using any third-party AI tool.
- Contact Ethics or a member of the Artificial Intelligence Ethics Advisory Committee with any concerns about adherence to our Ethical AI policy and principles.

Why It Matters

- While AI can be an extraordinary tool, be aware of the risks and always consider the long-term benefits and implications its use might have.
- Not all AI models are created equal. Understand the strengths and weaknesses of models before you use them. Seek assistance from our AIMLabs team if needed.
- Caution must be used when using data generated by AI tools as the output from these tools often contain copyrighted data or imagery.
- AI-generated content may contain backdoors, errors or proprietary code from other companies.
- Rigorous software development practices must be applied when using these tools for customer-delivered products and services to ensure the accuracy and quality of all work.

Key Policies

- CPS-022 Ethical Development and Use of Artificial Intelligence
- CRX-015 Protection of Sensitive Information
- CRX-019 Controlled Unclassified Information



AI Ethics Principles

Lockheed Martin subscribes to the following ethical principles in our AI design, development, deployment and internal use:

- Responsible
- Equitable
- Traceable
- Reliable
- Governable

Fair Competition

SET THE STANDARD

- Treat customers, suppliers, competitors and employees fairly.
- Communicate accurately and truthfully with prospective customers, suppliers and partners.
- Execute all contracts in full compliance with laws, specifications, requirements and contract terms and conditions.
- Apply competitive principles when acquiring goods and services, to the greatest practical extent.
- Do not request, accept, use, copy or distribute any information that Lockheed Martin is not authorized to use.
- Report any inquiries related to bid or negotiation activities to the Legal Department.



Why It Matters

- Maintaining the highest standards of integrity in our procurement processes and in bidding or negotiating contracts, is essential to delivering on current and future contracts, products and services.
- Open competition expands the pool of potential suppliers and helps guard against favoritism.
- Discussing, using, copying or distributing any unauthorized information (especially pricing, bid strategy or customer information obtained during bids or negotiations or in connection with attendance at trade shows, industry groups or training) without seeking guidance from the Legal Department or Ethics Office may violate policy and be illegal.

Key Policies

- CPS-009 New Business Opportunity Management
- CPS-113 Acquisition of Goods and Services
- CPS-441 Cost Estimating/Pricing
- CPS-729 Compliance with United States Antiboycott Laws
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-011 International Business Development Consultants
- CRX-013 Government and Competitor Information
- CRX-015 Protection of Sensitive Information
- CRX-019 Controlled Unclassified Information

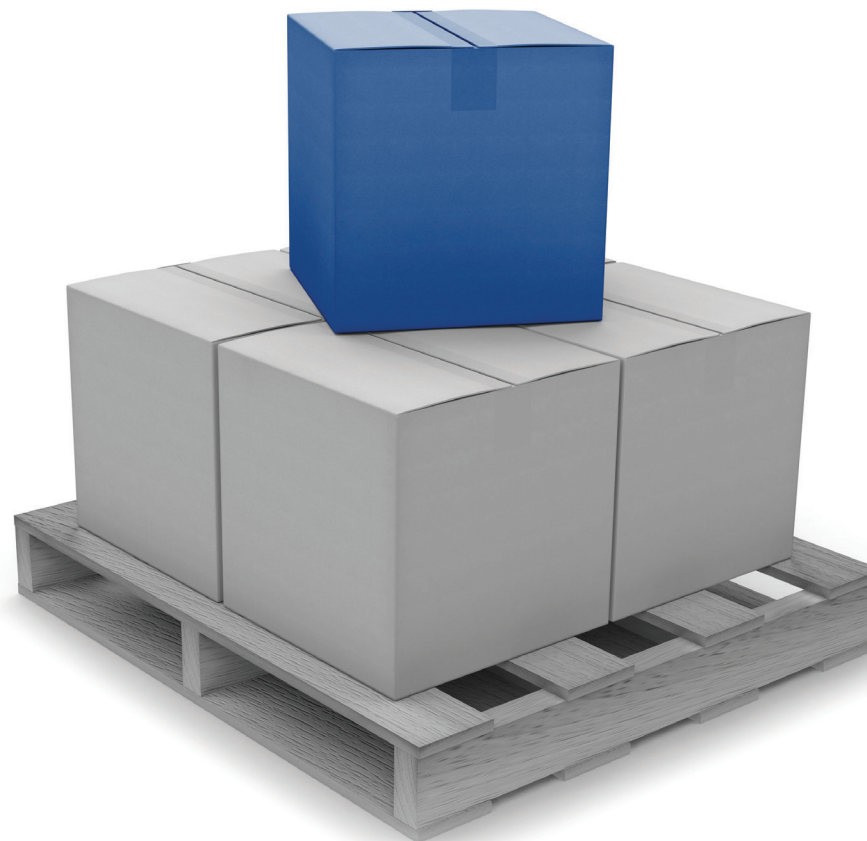
Abide by International Trade Laws

SET THE STANDARD

- Comply with all export and import laws and regulations that apply to the transfer of materials, services, software, technical data, equipment and technology between countries.
- Do not engage in or support restrictive international trade practices or boycotts not sanctioned by the U.S. Government.
- Comply with U.S. law and the laws of the countries where we do business.
- Immediately report any **written or oral** request in a bid or proposal that would require compliance with a boycott not sanctioned by the U.S. government to the Legal Department, even if Lockheed Martin decides not to proceed with the bid/proposal.

Why It Matters

- Export and import violations, and illegal boycotts, damage the trust and transparency needed to transact legitimate and long-term business.
- Export controls and sanctions are designed to prevent the proliferation of weapons, dual-use technologies and other sensitive items.
- Governments often restrict trade and certain business activities with parties that have a history of non-compliance. For example, U.S. law prohibits interaction with identified terrorist states and organizations.



Key Policies

- CPS-310 International Trade Controls and Compliance
- CPS-729 Compliance with United States Antiboycott Laws
- CRX-015 Protection of Sensitive Information

Written or oral: This includes explicit or more subtle contract language such as, "The Seller agrees to fully comply with the Israeli Boycott rules and certifies that the equipment to be supplied under this contract will not be of Israeli origin..." or "The Seller's specialists shall abide by all rules and laws of Country X."

Actions of Third Parties

SET THE STANDARD

- Do not engage with third parties in a manner that violates laws, policies or Lockheed Martin's values and principles.
- Ensure all third parties - including business development consultants, independent contractors and other representatives - understand, certify and adhere to applicable laws, regulations and Lockheed Martin's requirements when acting on the company's behalf.
- Provide training to designated third parties on our ethical values, policies and compliance requirements.



Why It Matters

- We may be accountable for the actions of anyone conducting business on our behalf.
- Improper actions conducted on our behalf could result in criminal or civil liability for the Corporation or for the employee(s) responsible for the third party.

Key Policies

- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CPS-113 Acquisition of Goods and Services
- CPS-716 Compliance with the Anti-Kickback Act of 1986
- CPS-730 Compliance with Anti-Corruption Laws
- CPS-734 Combating Trafficking in Persons
- CRX-010 U.S. Business Development Consultants
- CRX-011 International Business Development Consultants
- CRX-025 Teaming Agreements
- CRX-106 Managing Major Subcontracts
- CRX-126 Counterfeit Prevention

Corruption and Kickbacks are not Tolerated

SET THE STANDARD

- Do not offer, give, solicit or receive any form of **bribe** or **kickback**.
- Do not engage with any business relation that may breach applicable anti-corruption laws, our Code of Conduct, or could otherwise be perceived as likely to act improperly.
- Watch for **red flag** indicators such as poor reputation, ties to government and public officials, questionable circumstances, unusual compensation, non-standard accounting/invoicing or insufficient capabilities.

Why It Matters

- **Corruption** creates unfair competition, increases cost and jeopardizes the quality and capability of our products and services.
- Even an attempt to corrupt is illegal and may be prosecuted under U.S. and other countries' laws.
- Doing business where even a hint of impropriety exists can cause irreparable reputational damage and expose us to legal consequences such as substantial fines and debarment.
- Corruption undermines economic and social development, destabilizes markets and erodes trust.

Key Policies

- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CPS-021 Good Corporate Citizenship and Respect for Human Rights
- CPS-310 International Trade Controls and Compliance
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-011 International Business Development Consultants
- CRX-015 Protection of Sensitive Information



Bribe: *Bribery is 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.*

Kickback: *A kickback is any money, fee, commission, credit, gift, gratuity, thing of value, loan, entertainment, service or compensation of any kind that is provided, directly or indirectly, to any prime contractor, prime contractor employee, subcontractor or subcontractor employee for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime or subcontract.*

Red Flag: *A "red flag" is a fact, event, set of circumstances or other information that may indicate a potential legal compliance concern for illegal or unethical business conduct, particularly with regard to corrupt practices and non-compliance with anti-corruption laws.*

Corruption: *Any unlawful, illegitimate or improper behavior intended to gain an advantage which includes bribery, fraud, extortion, theft, abuse of power and money laundering.*

Adhere to all Antitrust Laws

SET THE STANDARD

- Do not engage in business arrangements that eliminate or discourage competition or give an improper competitive advantage.
- When engaging with competitors or partners, do not discuss or agree to allocate bids, contracts, customers, markets/territories, coordinated pricing or limiting the supply of products or services.

Why It Matters

- Antitrust laws worldwide safeguard trade and commerce by prohibiting unlawful restraints, monopolies and unfair practices, thereby protecting customers, Lockheed Martin and our business partners.
- Violations can result in substantial penalties or damages and in cases of extreme violations such as price fixing or market allocation can be criminal conduct for the company or the individuals involved.
- Antitrust analysis is driven by the competitive impact of the company's business arrangements, and the intended purpose and effect can be an important factor in the assessment.
- Under certain conditions, teaming agreements with competitors and exclusive teaming agreements with suppliers can raise potentially significant antitrust issues and result in government investigations.

Key Policies

- CPS-720 Compliance with the Antitrust Laws
- CRX-025 Teaming Agreements



Antitrust rules apply to more than you might think. They require that you avoid engaging in certain activities and business discussions.

Examples include:

- Price fixing.
- Boycotting suppliers or customers.
- Pricing intended to run a competitor out of business.
- Disparaging, misrepresenting or harassing a competitor.
- Teaming with companies to create less competitive outcomes for customers or blocking competitors to prevent market entry.
- Restricting the hiring or salaries of employees with competitors or suppliers.
- Entering into agreements with competitors to divide the market by allocating bids, contracts, markets/territories or restricting the production or sale of products or product lines.
- Conditioning the sale of one product or service on the sale of another product or service.
- Conditioning the sale or purchase of products or services on the requirement that the seller or purchaser not do business with competitors of the Corporation.

Accept and Provide Only Appropriate Business Courtesies

SET THE STANDARD

- Verify that the offer or receipt of anything of value is permitted by law and regulation and does not violate the rules and standards of the recipient's organization.
- Confirm that courtesies are consistent with reasonable marketplace customs and will not damage Lockheed Martin's reputation or cause embarrassment.
- Ensure business courtesies are not lavish and cannot be perceived as an attempt to secure favorable treatment.
- Adhere to established country-specific, permissible thresholds which may not be exceeded without prior approvals.
- Consult policy and seek guidance to ensure the complex rules and monetary limits pertaining to public officials are strictly followed.
- Procure products and services impartially and decline any courtesies that could create the appearance of an improper relationship.
- Do not sponsor anything, directly or indirectly, with the intent to secure future business, gain an improper advantage or induce improper conduct.



Why It Matters

- Our definition of a business relationship is broad, covering any individual or group with whom we do business, intend to do business with or who seeks to do business with us.
- When gifts or **business courtesies** are exchanged, it can create the perception that favors were granted in order to improperly influence business judgment.
- It is not only the value of the business courtesy that matters. The simple act of offering, giving or receiving any business courtesy or the perception of an intent to gain an improper business advantage, may be illegal or unethical.
- Global Supply Chain Operations employees and those who are involved in the process of directing business or funds are held to a higher standard.

Key Policies

- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CPS-716 Compliance with the Anti-Kickback Act of 1986
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-010 U.S. Business Development Consultants
- CRX-011 International Business Development Consultants
- CRX-014 Individual Conflict of Interest

Business Courtesies: *A business courtesy is any tangible or intangible thing of value for which fair market value is not paid by the recipient.*

Safe and Healthy Work Environment

SET THE STANDARD

- Provide a safe and healthy work environment and operate in a manner that protects the environment, conserves natural resources and prevents pollution.
- Stop immediately if something that is unsafe or can harm the environment is identified.
- Report any non-compliance to posted warnings, procedures and regulations.
- Immediately report any accident, injury or close call sustained while working or any other safety or health concern.

Why It Matters

- A safe and healthy work environment protects our people, boosts productivity and upholds our legal obligations and ethical responsibilities.
- Whether working on-site or at home, it is important that our workplace is safe and beneficial to our welfare and the environment.

Key Policies

- CPS-015 Environment, Safety and Health



Maintain a Drug-Free Workplace

SET THE STANDARD

- Do not sell, manufacture, transfer, traffic, use or be under the influence of illegal drugs or abuse legal drugs while in the workplace or performing company business.
- Do not be under the influence of alcohol in the workplace or in any other location where we perform business on behalf of the Corporation.
- Comply with the Drug-Free Workplace Act of 1988 and federal, state and local laws and regulations concerning violations of criminal drug statutes in the workplace.
- Utilize company resources for alcohol and drug dependency assistance and encourage others to do the same when needed.

Why It Matters

- Using an illegal substance can negatively impact your ability to perform safely, be productive and obtain or maintain a security clearance or continued employment.
- State and local initiatives legalizing the use of marijuana for medical and/or recreational purposes do not alter Lockheed Martin's obligation as a federal contractor to maintain a drug-free workplace.
- Being "under the influence" doesn't necessarily mean being above the legal limit.



Key Policies

- CRX-525 Tobacco- and Smoke-Free Environment
- CRX-545 Drug-Free Workplace

Security

SET THE STANDARD

- Protect our people, operations and assets around the globe.
- Take action to mitigate threats to employee safety and information.
- Properly safeguard all classified material and other customer and partner information entrusted to the corporation.
- Comply with and seek to exceed customer and national security policy requirements.
- Promptly report unauthorized access to information or assets.
- Report unusual changes in a colleague's behavior or suspicious activity such as abnormal inquiries about our people, facilities, operations, programs or products.

Why It Matters

- Security compliance benefits our Corporation, customers, national security and global stability.
- Adherence to security requirements supports contract performance and enables our products and services to be delivered uncompromised.
- A robust security culture fosters a safe environment for our workforce and others within our workspaces.
- We are a target for threat actors seeking to illicitly obtain information to disrupt our product capabilities, cause harm to customer priorities and/or coerce our people.
- Threat actors can use methods designed to influence an unintended course of action such as an email that appears legitimate but could create risk to information technology environments.
- Timely reporting enables early intervention which can help mitigate or limit risk to people and information.

Key Policies

- CPS-569 Security
- CRX-052 Crisis Management
- CRX-053 Workplace Security - Maintaining a Safe and Respectful Workplace Free from Threats and Violence
- CRX-055 Travel or Assignment to Elevated Risk Locations
- CRX-056 Global Security Operations
- CRX-057 Enterprise Security Services
- CRX-059 Insider Threat Detection Program



Sustainability

SET THE STANDARD

- Promote innovation, integrity and security across all our platforms and services to keep the world safe today and in the future.
- Maximize the positive contributions of our operations, products and services on the environment, community and infrastructure.
- Operate in a manner that protects people and the environment by upholding ethical business conduct, conserving natural resources and preventing pollution.

Why It Matters

- Sustainability:
 - Drives affordability, risk mitigation and innovation throughout our business strategy and our value chain.
 - Ensures long-term competitiveness of our business and health of our communities and planet. Improves customer and stakeholder collaboration.
 - Signifies commitment and fosters a sense of purpose that aligns with employee values.

Key Policies

- CPS-021 Good Corporate Citizenship and Respect for Human Rights
- CPS-803 Sustainability
- CRX-202 Restrictions on the Use of Chemical Substances in Products and Processes
- CRX-350 Energy



Respect and Appreciate Human Rights

SET THE STANDARD

- Act as a good corporate citizen by respecting and protecting global human rights including:
 - Treating employees with respect.
 - Promoting responsible employment.
 - Providing fair and competitive wage and hour practices.
 - Prohibiting harassment, bullying, discrimination, use of child or forced labor or trafficking in persons for any purpose.
- Take the appropriate steps to ensure respect for human rights in our business and our supply chain.
- Adhere to human rights precepts in our relations with stakeholders and through our products and services.

Why It Matters

- Protecting and advancing human rights:
 - Maintains our commitment to integrity and our core values.
 - Promotes employee satisfaction and productivity.
 - Enhances the competitiveness of our business.
- Trafficking in persons and modern slavery remain global concerns, and without careful attention, we risk unintentionally engaging with third parties who fail to uphold these principles.
- Suspicious behavior or activities may indicate the presence of human rights violations.
- Employees can exercise their right of free association and to choose or not choose collective bargaining representation.

Key Policies

- CPS-001 Ethics and Business Conduct
- CPS-003 Nondiscrimination and Equal Employment Opportunity
- CPS-021 Good Corporate Citizenship and Respect for Human Rights
- CPS-730 Compliance with Anti-Corruption Laws
- CPS-734 Combating Trafficking in Persons
- CPS-803 Sustainability



Political Process

SET THE STANDARD

- Follow corporate policy and the law concerning the political process in all countries where we do business.
- Uphold the spirit and letter of all laws relating to our participation in the political process.

Why It Matters

- Laws governing political contributions and lobbying are complex.
- Even unintended violations can result in loss of business opportunities, damage to our reputation and civil and criminal penalties.
- It is prohibited to use any Lockheed Martin funds, assets or facilities for the benefit of political parties or candidates anywhere in the world without obtaining prior written approval.



REQUIRE CAUTION

- Public Office - Conflicts of interest can arise if you seek or hold public office or serve on commissions or advisory groups.
- Lobbying - Lobbying can be direct or indirect, but either way, it is highly scrutinized and must follow policy.
- U.S. Congressional and Executive Branch - It is important that Lockheed Martin presents a single, consistent business message to our U.S.-based customer community. Government Affairs works with business areas to develop a unified approach to the Corporation's U.S.-based marketing initiatives and policy, regulatory and legislative strategies. To this end, Government Affairs must authorize any interaction with U.S. Congressional members or Executive Branch officials in Washington, D.C. or their employees and staff.
- State and Local Governments - Government Affairs must authorize any interaction with state and local government officials on behalf of Lockheed Martin.
- Non-U.S. Governments - Follow policy when engaging with non-U.S. Government Officials to assure that their activities are permitted and within local laws and regulations.
- Individual Political Contributions - Some state and local laws may restrict, limit or require disclosure of personal political contributions made by individual employees or their immediate family members.

WE SUPPORT THE POLITICAL PROCESS

- Many countries, in addition to the United States, may prohibit corporate political contributions. This may include donating corporate funds, goods or services, directly or indirectly, to political candidates including through consultants or employee work time.
- Local and state laws may limit corporate political contributions and activities.

PERMITTED

- You are encouraged to:
 - Participate in the Lockheed Martin Employees Political Action Committee, if eligible.
 - Participate personally in civic affairs and the political process on your own time and at your own expense.
 - Support the political parties and candidates of your choice.

Key Policies

- CPS-004 Political Activity
- CPS-005 International Operations
- CPS-008 Gifts, Hospitality, Other Business Courtesies, and Sponsorships
- CPS-045 Government Affairs
- CPS-730 Compliance with Anti-Corruption Laws
- CRX-014 Individual Conflict of Interest
- CRX-251 Charitable Contributions

Receipt and Acknowledgement

THE PRINT VERSION OF RECEIPT AND ACKNOWLEDGMENT IS ONLY USED BY EMPLOYEES WHO ARE READING A HARD COPY VERSION OF THIS DOCUMENT.

ALL EMPLOYEES WITH ACCESS TO OUR LEARNING MANAGEMENT SYSTEM WILL ACKNOWLEDGE COMPLETION ONLINE.

I acknowledge that I have read, understand and will abide by *Setting the Standard*, the Lockheed Martin Code of Ethics and Business Conduct. I understand that each Lockheed Martin employee, member of the Board of Directors, consultant, contract laborer or other agent representing or acting for the Corporation is responsible for knowing and adhering to the principles and standards of the Code. I also understand that violations of the Code are cause for corrective action, which may result in disciplinary action up to and including discharge.

Signature: _____

Print Name: _____

Employee Number (if applicable): _____

Company: _____

Date: _____ Location: _____

Contact Human Resources or Ethics for instructions on submitting this form and arranging for a record of completion. If you are not a Lockheed Martin employee, contact your Lockheed Martin point of contact.







ETHICS AND
BUSINESS CONDUCT
EXCELLENCE THROUGH INTEGRITY