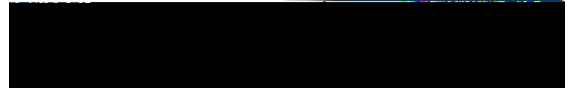


Lockheed Martin Corporation
Current policies and procedures are on the Lockheed Martin Intranet



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both policies.

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2.2 Alleged violations of export control or other int
United States and each foreign country in which th

and disclosed when appropriate, in accordance with [CPS-310](#), International Trade Controls and Compliance. If an

5.4 Personnel responsible for conducting an investigation covered by this policy will provide periodic reports on the status and findings of the investigation to the element's Legal Counsel, who will provide periodic reports to the corporate Vice President & Associate General Counsel - Litigation & Compliance or designee.

5.5 When there is credible evidence of a Reportable Violation, or reasonable grounds to believe either that federal laws other than those referenced in the definition of Reportable Violation may have been violated or that a matter warrants voluntary disclosure, the element's Legal Counsel or designee will prepare either (1) a written draft report of the violation and investigation and provide the draft report to the corporate Vice President & Associate General Counsel - Litigation & Compliance or designee, or (2) provide information on the violation and investigation to the Vice President & Associate General Counsel - Litigation & Compliance or designee for inclusion in a batch disclosure. The corporate Vice President & Associate General Counsel - Litigation & Compliance or designee will review the draft report or batch disclosure entry and obtain the approval of the Senior Vice President, General Counsel & Corporate Secretary if the matter to be disclosed is significant. Once corporate Legal approval is obtained, element or corporate Legal will submit the report or batch disclosure to the cognizant Office of the Inspector General. Element Legal Counsel will inform the cognizant Contracting Officer.

5.6 If there is a disagreement about whether the information in the draft report constitutes a Reportable Violation or provides a reasonable basis for voluntary disclosure, the Senior Vice President, General Counsel & Corporate Secretary will make the final decision whether to submit the report to the government.

5.7 The corporate Vice President & Associate General Counsel - Litigation & Compliance or designee will provide data on or copies of all reports submitted to the government to the Senior Vice President Ethics and Enterprise Assurance or designee, upon request.

6.0 Segregation and Allowability of Costs

When Legal Counsel determines that a matter constitutes a Reportable Violation or warrants voluntary disclosure (paragraph 5.5), separate account numbers will be established to collect the costs associated with the subsequent activities of all Lockheed Martin personnel involved (direct and indirect), including any related out-of-pocket costs, such as for outside counsel. The costs collected will be classified as allowable or unallowable in accordance with Cost Principles Compliance Manual 31.205-15, Fines, Penalties and Mischarging -

9.0 General

9.1 Nothing in this policy is intended to prevent employees from reporting violations of the [Lockheed Martin Code of Ethics and Business Conduct, Setting the Standard](#), or other misconduct, directly to Human Resources, Ethics Office, Legal Counsel, or other appropriate functional organization in accordance with [CPS-001](#), Ethics and Business Conduct. When a report is received, Ethics and, as appropriate, Legal, will facilitate an internal investigation in accordance with this policy.

9.2 Any deviation from this policy requires the prior approval of the Owner listed in [Lockheed Martin Command Media Central](#) or designee.

//s//Maryanne R. Lavan

Senior Vice President, General Counsel & Corporate Secretary