

Corporate Headquarters  
Corporate Policy Statement CPS-730  
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# Compliance with Anti-Corruption Laws

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## 1.0 Policy

1.1 Lockheed Martin will conduct our business activities in accordance with applicable anti-corruption laws, rules, and regulations, and [Code of Ethics and Business Conduct](#), Setting the Standard. Corruption substantially erodes the public economic and social development, threatens stability and security, and undermines fair trade and competition.

2.1 This policy applies to all officers, members of the Board of Directors, and employees of the Corporation and its subsidiaries within and outside the U.S., and, by written agreement, all appropriate provisions apply to any domestic or international representative, distributor, reseller, consultant, broker, agent, or any other person or firm by whatever name known, of any nationality, who is conducting business for or on behalf of the Corporation or its subsidiaries

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*Element Legal Counsel* . The Lockheed Martin attorney supporting a Lockheed Martin element (as defined in CRX-003, Policies and Procedures).

*Government-Owned Instrumentality* . An entity that is owned or controlled by a government. Government ownership or control can be whole, majority, or partial. Whether a particular entity will be treated like an instrumentality for the purposes of this policy requires a fact-specific analysis. See *Element Legal Counsel*.

*Kickback* . Any money, fee, commission, credit, gift, gratuity, thing of value, loan, entertainment, service, or compensation of any kind that is provided in exchange for a favor (whether business related or not). Kickbacks are a type of bribe where the two parties are in collusion so that each party gains from the exchange.

*Public Official* . A person who is, regardless of position, paid or unpaid, any of the following:

- An officer or employee of any government, department, agency, bureau, authority, or government-owned instrumentality, such as a state-owned or state-controlled entity;
- Acting in an official capacity for or on behalf of any government, department, agency, bureau, authority, or instrumentality;
- An official, employee, or person acting on behalf of a government-sponsored or public international organization such as the United Nations, World Bank, or the European Community;
- Holding a legislative, administrative, executive, or judicial position, whether appointed or elected;
- A political candidate, or an officer or employee of a political party;
- A member of a Royal Family; or
- A family member of or otherwise closely associated with any of the foregoing.

*Reportable Hospitality*

Anything of value when specifically authorized or required by a government contract (when the contract has been approved by element Legal Counsel and contains appropriate anti-corruption control measures).

*Responsible Officer* . A member of the Lockheed Martin Executive Leadership Team or designee, or the senior executive of any other element or his or her designee.

*Third Party* . An individual or entity other than Lockheed Martin such as a consultant, contractor, partner, competitor, joint venture partners, proposed acquisitions, teammates, supplier, subcontractors, higher-tier customers or prime contractors, licensees, freight forwarders, or customs brokers.

*Vice President & Associate General Counsel . International, Government Contracts, & Global Supply Chain designee* . Is any of the following:

The Corporate Associate General Counsel for Anti-Corruption Compliance, who acts as the ACPT lead;

The Corporate Associate General Counsel for International Law;

A designated Business Area Anti-Corruption Counsel (BAAC), who acts as the primary anti-corruption counsel for his or her respective business area; or

A Lockheed Martin attorney delegated specific anti-corruption legal compliance authority by the Vice President & Associate General Counsel . International, Government Contracts, & Global Supply Chain.

## **4.0 Anti-Corruption Laws**

### FCPA

4.1 The U.S. Foreign Corrupt Practices Act (FCPA) prohibits corruptly ofgA(eg)3(al)ETQq6W\*nBT/(-)]T\$is3W\*nl





Legal Counsel will ensure completed anti-corruption due diligence legal files are consolidated and retained as directed by the ACPT and Lockheed Martin policies and procedures.

## **8.0 Prohibitions and Requirements**

8.8 The Corporation may make charitable contributions in accordance with CRX-251, Charitable Contributions. Under no circumstances may a charitable contribution be made to an organization owned, controlled, or connected to a public official, or at the suggestion, request, or



circumstances requiring the payment. Element Legal Counsel, with the concurrence of the respective BAAC, or the Corporate Associate General Counsel for Anti-Corruption Compliance or the Corporate Associate General Counsel for International Law, will determine and document the circumstances surrounding the personal safety payment, and assist Finance to ensure that

The BAAC or Corporate Associate General Counsel will consult with the Vice President & Associate General Counsel, International, Government Contracts & Global Supply Chain for final concurrence.

Anti-Corruption Due Diligence and Monitoring of International Third Parties, Agreements, and Acquisitions

8.14 Before establishing any international business relationship with a third party on behalf of Lockheed Martin or its subsidiaries and affiliates, Covered Persons must consult with element Legal Counsel to determine the appropriate level of risk-based anti-corruption due diligence necessary to: (1) evaluate the business reputation of the third party and the risks posed to the Corporation in doing business with the third party; (2) understand and document the business rationale for including the third party; and (3) inform compliance program and commitment to ethical business conduct and compliance with anti-corruption laws and obtain the third party assurances that it will comply with such commitments. This requirement applies to proposed agreements and renewal of agreements with non-U.S. consultants, joint venture partners, acquisitions, teammates, subcontractors and suppliers, higher-tier customers or prime contractors, pass through customers such as resellers or distributors, licensees, and other third parties performing services on behalf of Lockheed Martin (or its subsidiaries and affiliates), such as freight forwarders and customs brokers. As part of the due diligence and assurance process, Form C-730-1, International Anti-Corruption Questionnaire, Form C-730-2, Anti-Corruption Law Certification, or appropriate similar questions and representations may be required.

8.15 Due diligence requires fact-collecting and will vary depending on the applicable risk factors, transaction. The Lockheed Martin individual responsible for establishing the business relationship has the primary responsibility for fact-collecting and will ensure that timely requests for due diligence are submitted





President & Associate General Counsel . International, Government Contracts, & Global Supply Chain or designee. Incidental cash or cash equivalent payments (e.g., reimbursement of expenses or per diem payments) may only be provided directly to the individual public official when prior written approval of element Legal Counsel is obtained in accordance with CPS-008.

8.31 The corporate Vice President & Controller will ensure ~~o@e@ Ô[ !] [ !æ] } q æ& ~ } ð \*~~ and recordkeeping activities, policies, manuals, and instructions are compliant with the anti-corruption laws with respect to being complete and accurate.

8.32 Ú^|•[ ] ^| ^• [ ] •ã|^ †| c@ Ô[ !] [ !æ] } q -ð æ &ã à [ \ •Ê records, and internal accounting controls periodically must review these books, records, and controls in accordance with CPS-011, Internal Control and Enterprise Risk Management, and the Corporate Controller's Manual to ensure their compliance with anti-corruption laws.

8.33 Each Covered Person is responsible for accurately recording all his or her transactions which involve any expense of the Corporation or other transactions which dispose of or transfer Corporation assets.

## 9.0 Reporting

10.2 The Responsible Officer for each business area will ensure that his or her element•q accounting and other data systems which are not integrated into the Anti-Corruption Compliance Monitoring Program are identified and are, thereafter, either integrated into the Anti-Corruption Compliance Monitoring Program or are separately screened on a regular basis for potential violations of this policy, CPS-008, and CRX-011 and that confirmed violations are reported to the Vice President & Associate General Counsel . International, Government Contracts, & Global Supply Chain. As necessary, the e|^ { ^} q chief financial officer or designee, the Vice President & Associate General Counsel . International, Government Contracts, & Global Supply Chain designee, and/or Corporate Consultant Services will provide inputs, advice, and direction on preparation of any independent reports.

10.3 The reporting requirements described in this section are in addition to and separate from any reports otherwise required by corporate Finance or an ^|^ { ^} q Ø ð æ & [ !\* æ ã æä } È

### **11.0 Training**

All directors, officers, and employees of the Corporation and all of its wholly-owned subsidiaries involved in international business are required to complete annual training on compliance with anti-corruption laws as determined by the Legal department in consultation with the Ethics department. Annual training of International Business Development Consultants will be conducted in accordance with CRX-011.

### **12.0 Corporate Internal Audit**

In accordance with its annual audit plans, Corporate Internal Audit will periodically assess or audit internal controls across the Corporation to ensure compliance with this policy and anti-corruption laws. Audit reports concerning anti-corruption compliance will be provided to the Vice President & Associate General Counsel . International, Government Contracts, & Global Supply Chain, who will provide the results to the Senior Vice President, General Counsel & Corporate Secretary.

### **13.0 Deviations**

Any deviation from this policy requires the prior written approval of the Owner listed in Lockheed Martin Command Media Central or designee unless legal opinions have been obtained from competent outside counsel that the conduct for which approval is sought does not violate any anti-corruption laws.

//s//Maryanne R. Lavan  
Senior Vice President, General Counsel & Corporate Secretary