

**Corporate Process Requirement No: CPR001.2.1 Issue Date: September 1995**

**Sponsor: John Stichman, 00003**

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Change Summary

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## **Title: Setting the Standard - Code of Ethics and Business Conduct**

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Dear Sandian,

Sandia National Laboratories is committed to sound ethics and business conduct in accordance with our values, policies and the law. Our core purpose of "exceptional service in the national interest" enables us to be an outstanding laboratory, providing engineering solutions to national security problems. To maintain that reputation, we must be perceived as exceptionally ethical by our employees, customers and the taxpayers.

As the provider of innovative, science-based, systems engineering solutions to our nation's most challenging national security problems, we develop and apply advanced technology to keep our nation secure and capable of meeting its toughest challenges. Our "passion for our mission" had led to significant contributions over our 56-year history. As an institution, Sandia values Service to the Nation, Excellence, Each Other, Integrity and Teamwork; those values provide the basis in which to work professionally, ethically and securely in achieving our mission.

Each Sandian must embrace and live by sound ethics and business conduct in the same manner as each of us is called to incorporate security, environment safety & health, quality, diversity, and operational excellence in our daily work activities. To promote positive ethical behavior, the Ethics and Business Conduct Office has established the "Doing the Right Thing" recognition process. Please refer to the Ethics and Business Conduct Office Web page for additional information.

Sandia has embraced the Lockheed Martin Code of Conduct except as noted in the disclaimer

concerning gifts and the contact information of the Company Ethics Officers. Please read the accompanying documentation and printout or bookmark it. When you have a question concerning business conduct or concerns of ethical misconduct, you are encouraged to seek advice or raise concerns to your manager, any member of management, or the Ethics and Business Conduct Office. In addition, an anonymous helpline (844-1744) is available to address all business conduct questions and concerns.

Sincerely,

THOMAS O. HUNTER

President

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**\*Disclaimer:** *Sandia's business rules involving gifts are more restrictive than Lockheed Martin's based on Sandia's prime contract with the Department of Energy and its status as a Federally Funded Research and Development Center. In most cases, Sandians are not permitted to accept gifts with a market value of \$20 or more, or to give gifts other than promotional items of nominal value, (i.e., less than \$20). As a general rule, always check the official watermarked Sandia business rules on the intranet before taking action.*

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Dear Colleague,

This booklet, *Setting the Standard*, has been adopted by the Lockheed Martin Board of Directors as our company's Code of Ethics and Business Conduct. It summarizes the principles that guide our actions in the global marketplace. Our Code applies to all Lockheed Martin employees, members of the Board of Directors, agents, consultants, contract labor, or others, when they are representing or acting for the corporation. We expect our contractors and suppliers to be guided by these standards as well. Our Code promotes “doing the right things,” as well as “doing things right” to maintain our personal and institutional integrity.

The personal integrity of each of our employees and their commitment to the highest standards of personal and professional conduct underlie the ethical culture of Lockheed Martin. At Lockheed Martin, we believe that ethical conduct requires more than simply complying with the laws, rules, and regulations that govern our business. We are a company that values teamwork, sets team goals, assumes collective accountability for actions, embraces diversity, and promotes “full-spectrum” leaders – those who meet their performance objectives while also exhibiting the leadership behaviors we value. Our commitment to excellence is exemplified in our company vision

Powered by innovation, guided by integrity, we help our customers achieve their most challenging goals.

While we remain sensitive to the diverse social and cultural settings in which we conduct our business, Lockheed Martin aims to set the standard for ethical conduct at all of our locations throughout the world. We will achieve this through behavior in accordance with our company values.

- **Do What’s Right:** We are committed to the highest standards of ethical conduct in all that we do. We believe that honesty and integrity engender trust, which is the cornerstone of our business. We abide by the laws of the United States and other countries in which we do business, we strive to be good citizens, and we take responsibility for our actions.
- **Respect Others:** We recognize that our success as an enterprise depends on the talent skills, and expertise of our people and our ability to function as a tightly integrated team. We appreciate our diversity and believe that respect – for our colleagues, customers, partners, and all those with whom we interact – is an essential element of all positive and productive business relationships.

- **Perform With Excellence:** We understand the importance of our missions and the trust our customers place in us. With this in mind, we strive to excel in every aspect of our business and approach every challenge with a determination to succeed.

There are numerous resources available to assist you in meeting the challenge of performing your duties and responsibilities. If you are faced with an ethical dilemma, your supervisor is usually the best source of information and guidance. Additionally, the Human Resources, Legal, Procurement, Contracts, Information Services, Energy Environment Safety & Health, Finance and Security organizations as well as Ethics Officers are available to assist you whenever necessary. Corporate Policy Statements and local policies and procedures that provide details pertinent to many of the provisions of the Code can be accessed via the Lockheed Martin Information Network or obtained from your supervisor (not applicable to Sandia National Laboratories). Although your own common sense and good judgment should be your first guide to appropriate conduct, do not hesitate to use these additional resources whenever clarification is necessary.

We are proud of our employees and the important role our corporation plays in our communities, our industry, and in the national security of the United States and its allies. Thank you for doing your part to create and maintain an ethical work environment... and for *Setting the Standard*.

ROBERT J. STEVENS  
President and  
Chief Executive Officer

April 2006

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## ***Our Commitments***

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***For our employees:*** we are committed to honesty, just management, fairness, a safe and healthy environment free from the fear of retribution, and respecting the dignity due everyone.

***For our customers:*** we are committed to produce reliable products and services, delivered on time, at a fair price.

***For the communities:*** in which we live and work we are committed to observe sound environmental business practices and to act as concerned and responsible neighbors, reflecting all aspects of good citizenship.

***For our shareholders:*** we are committed to pursuing profitable growth, without taking undue risk, to exercising financial discipline in the deployment of our assets and resources, and to making accurate, timely, and clear disclosures in all public reports and communications.

***For our suppliers and partners:*** we are committed to fair competition and the sense of responsibility required of a good customer and teammate.

**We are committed to ethical behavior in all that we do.**

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### ***Obey the Law***

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We will conduct our business in accordance with all applicable laws and regulations. The laws and regulations related to government contracting are far-reaching and complex, thus placing responsibilities on Lockheed Martin beyond those faced by companies without government customers. Compliance with the law does not comprise our entire ethical responsibility. Rather, it is a minimum, absolutely essential condition for performance of our duties.

**We will conduct our business in accordance with all applicable laws and regulations.**

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### ***Promote a Positive Work Environment***

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All employees want and deserve a workplace where they feel respected, satisfied, and appreciated. As a global enterprise, we respect cultural diversity and recognize that the various countries in which we do business may have different legal provisions pertaining to the workplace. As such, we will adhere to the limitations specified by law in all of our locations, and further, we will not tolerate harassment or discrimination of any kind -- especially involving age, sex, ancestry, color, disability, national origin, race, religion, United States military veteran's status, sexual orientation, marital status, or family structure. **Sandia is bound by policy to not tolerate discrimination including harassment based on sexual orientation. (Corporate Policy Statement Requirement, CPSR 300.1)**

Providing an environment that supports honesty, integrity, respect, trust, responsibility, and citizenship permits us the opportunity to achieve excellence in our workplace. While everyone who works for the company must contribute to the creation and maintenance of such an environment, our executives and management personnel assume special responsibility for fostering a work environment that is free from the fear of retribution and will bring out the best in all of us. Supervisors must be careful in words and conduct to avoid placing, or seeming to place, pressure on subordinates that could cause them to deviate from acceptable ethical behavior.

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### ***Work Safely: Protect Yourself, Your Fellow Employees, and the World We Live In***

We are committed to providing a drug-free, safe, and healthy work environment, and to observe environmentally sound business practices throughout the world. We will strive, at a minimum, to do no harm and where possible, to make the communities in which we work a better place to live. Each of us is responsible for compliance with environmental, health, and safety laws and regulations. Observe posted warnings and regulations. Report immediately to the appropriate management any accident or injury sustained on the job, or any environmental or safety concern you may have.

**We are committed to providing a drug-free, safe, and healthy work environment.**

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### ***Keep Accurate and Complete Records***

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We must maintain accurate and complete company records. Transactions between the company and outside individuals and organizations must be promptly and accurately entered in our books in accordance with generally accepted accounting practices and principles in the United States. No one should rationalize or even consider misrepresenting facts or falsifying records. It will not be tolerated and will result in disciplinary action.

**No one should rationalize or even consider misrepresenting facts or falsifying records.**

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### ***Make Accurate Public Disclosures***

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We must assure that all disclosures made in all periodic reports and documents filed with the Securities and Exchange Commission, and other public communications by the corporation, are full, fair, accurate, timely, and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation of such reports, including drafting, reviewing, and signing or certifying the information contained therein. This requires operating in an environment of open communication, while not compromising proprietary and confidentiality concerns.

If you have concerns about any aspect of our financial disclosures, you should talk to your manager, the Finance organization, the Legal Department, or the Ethics Office. Any employee who is contacted by another employee expressing concerns about questionable accounting or auditing matters must immediately report those concerns to the Ethics Office.

**We are committed to full, fair, accurate, timely and understandable disclosure in all public communications.**

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### ***Record Costs Properly***

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Employees and their supervisors are responsible for ensuring that labor and material costs are accurately recorded and charged on the company's records. These costs include, but are not limited to, normal contract work, work related to independent research and development, and bid and proposal activities.

**All employees are responsible for... the company's records.**

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### ***Strictly Adhere to All Antitrust Laws***

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Antitrust is a blanket term for laws that protect the free enterprise system and promote open and fair competition. Such laws exist in the United States, the European Union, and in many other countries where the company does business. These laws deal with agreements and practices "in restraint of trade" such as price fixing and boycotting suppliers or customers. They also bar: pricing intended to run a competitor out of business; disparaging, misrepresenting, or harassing a competitor; stealing trade secrets; bribery; and kickbacks.

Antitrust laws are vigorously enforced. Violations may result in severe penalties such as forced sales of parts of businesses and significant fines against the company. There may also be sanctions against individual employees including substantial fines and prison sentences. These laws also apply to international operations and transactions related to imports into and exports from the countries in which we do business. Employees involved in any dealings with competitors are expected to know that United States and other countries' antitrust laws may apply to their activities and to consult with the Legal Department prior to negotiating with or entering into any arrangement with a competitor.

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### ***Know and Follow the Law When Involved in International Business***

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Corruption erodes confidence in the marketplace, undermines democracy, distorts economic and social development, and hurts everyone who depends on trust and transparency in the transaction of business. The company is committed to conduct its activities free from the unfair influence of bribery and to foster anti-corruption awareness among its employees and business relations throughout the world. There are several laws that govern these transactions:

- The Foreign Corrupt Practices Act (FCPA) is a United States law that prohibits corruptly giving, offering or promising anything of value to foreign officials or foreign political parties, officials or candidates, for the purpose of influencing them to misuse their official capacity to obtain, keep, or direct business or to gain any improper advantage. In addition, the FCPA prohibits knowingly falsifying a company's books and records or knowingly circumventing or failing to implement accounting controls. Employees involved in international operations must be familiar with the FCPA and with similar laws that govern our operations in other countries in which we do business.
- The International Traffic in Arms Regulations (ITAR) is a United States law that regulates the international transfers of equipment or technology that may contain prior approval, licensing, and reporting requirements. Employees involved in international operations must also be familiar with the ITAR.
- Additionally, it is illegal to enter into an agreement to refuse to deal with potential or actual customers or suppliers, or otherwise to engage in or support restrictive international trade practices or boycotts.

It is always important that employees conducting international business know and abide by the laws of the United States and the countries that are involved in the activities or transactions. These laws govern the conduct of Lockheed Martin employees throughout the world. If you participate in these business activities, you should know, understand, and strictly comply with these laws and regulations. If you are not familiar with these rules, consult with your supervisor, Business Development organization and the Legal Department prior to negotiating any foreign transaction.

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### ***Know and Follow the Law and Use Common Sense in Political Contributions and Activities***

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Lockheed Martin encourages its employees to become involved in civic affairs and to participate in the political process. Employees must understand, however, that their involvement and participation must be on an individual basis, on their own time, and at their own expense. In the United States, federal law prohibits corporations from donating corporate funds, goods, or services, directly or indirectly, to candidates for federal offices. This includes employees' work time. Local and state laws also govern political contributions and activities as they apply to their respective jurisdictions, and similar laws exist in other countries.

Employees must also be certain to know and follow corporate guidance before contacting U.S. Congress and Executive Branch employees and staff. Always ask before you act to avoid unintentional violations of corporate policy and federal rules concerning gifts and lobbying.



We strive to present a single, consistent business message to our Washington, DC-based customer community. Always coordinate with Washington Operations, prior to interacting with U.S. government and Executive Branch employees and staff.

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### ***Carefully Bid, Negotiate, and Perform Contracts***

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We must comply with the laws and regulations that pertain to the acquisition of goods and services by our customers. We will compete fairly and ethically for all business opportunities. In circumstances where there is reason to believe that the release or receipt of non-public information is unauthorized, do not attempt to obtain and do not accept such information from any source.

Appropriate steps should be taken to recognize and avoid organizational conflicts in which one business unit's activities may preclude the pursuit of a related activity by another company business unit.

If you are involved in proposals, bid preparations, or contract negotiations, you must be certain that all statements, communications, and representations to prospective customers are accurate and truthful. Once awarded, all contracts must be performed in compliance with specifications, requirements, and clauses.

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### ***Avoid Illegal and Questionable Gifts or Favors***

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The sale of Lockheed Martin products and services should always be free from even the perception that favorable treatment was sought, received, or given in exchange for the furnishing or receipt of business courtesies. Employees will neither give nor accept business courtesies that constitute, or could be reasonably perceived as constituting, unfair business inducements or that would violate law, regulation or policies of the company or customer, or could cause embarrassment to or reflect negatively on the company's reputation. Although customs and practices may differ among the many marketplaces in which we conduct our business, our policies in this regard are substantially similar within the United States and elsewhere throughout the world. As a matter of respect for the diverse customs practiced among our business relations internationally, permissive conduct may differ somewhat in accordance with applicable policy or upon guidance from the business unit's Ethics Officer and Legal Department.

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### ***Gifts, Gratuities, and Business Courtesies to U.S., State, and Local Government Employees***

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Federal, state and local government departments and agencies are governed by laws and regulations concerning acceptance by their employees of entertainment, meals, gifts, gratuities, and other things of

value from firms and persons with whom those government departments and agencies do business or over whom they have regulatory authority. It is the policy of Lockheed Martin to comply strictly with those laws and regulations.

\*(SEE DISCLAIMER ABOVE TABLE OF CONTENTS)

### ***Federal Executive Branch Employees***

Lockheed Martin employees are prohibited from giving anything of value to federal Executive Branch employees, except as follows:

- Lockheed Martin advertising or promotional items of *little intrinsic value* (generally \$20.00 or less) such as a coffee mug, calendar, or similar item displaying the company logo;
- Modest refreshments such as soft drinks, coffee, and donuts on an occasional basis in connection with business activities; or
- Business-related meals and local transportation having an aggregate value of \$20.00 or less per occasion, provided such items do not in aggregate exceed \$50.00 in a calendar year. Although it is the responsibility of the government employee to track and monitor these thresholds, no Lockheed Martin employee shall knowingly provide meals and/or transportation exceeding the \$20.00 individual or \$50.00 annual limit.

Other exceptions regarding certain types of meetings, widely attended gatherings and business activities outside of the United States are detailed in [CPS-008 “Gifts, Gratuities, and Other Business Courtesies.”](#)

### ***Federal Legislative and Judiciary Branches, and State and Local Government Employees***

Employees of the federal, Legislative and Judiciary Branches and employees of state and local government departments or agencies are subject to a wide variety of different laws and regulations. Consult these laws and regulations and Corporate Policy Statements prior to offering such employees anything of value.

## ***Business Courtesies to Non-Government Persons***

### **Meals, Refreshments and Entertainment**

It is an acceptable practice for Lockheed Martin employees to provide meals, refreshments, entertainment, and other business courtesies of reasonable value to non-government persons in support of business activities, provided:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization; the offerer inquires about prohibitions or limitations of the recipient's organization before offering any business courtesy; and

- The business courtesy must be consistent with marketplace practices, infrequent in nature, and may not be lavish or extravagant. While it is difficult to define "lavish or extravagant" by means of a specific dollar amount, a common sense determination should be made consistent with reasonable marketplace practices.

\*(SEE DISCLAIMER ABOVE TABLE OF CONTENTS)

### **Gifts**

Lockheed Martin employees are prohibited from offering or giving tangible gifts (including tickets to sporting, recreational, or other events) having a market value of \$100.00 or more, to a person or entity with which the company does or seeks to do business, unless specifically approved by his or her supervisor, and the business unit's Ethics Officer.

### ***Business Courtesies to Foreign Government Personnel and Public Officials***

The Foreign Corrupt Practices Act and by laws of other countries may restrict the company from giving meals, gifts, gratuities, entertainment, or other things of value to personnel of foreign governments and foreign public officials. Employees must obtain prior Legal Department approval where the hospitality (i. e., meal, gift, gratuity, entertainment or other thing of value) to be given is not clearly permissible under the Hospitality Guidelines and Matrix maintained by the Legal Department.

**Employees must discuss such situations with Legal Counsel...**

### ***Business Courtesies to Lockheed Martin Employees***

#### **Meals, Refreshments and Entertainment**

Although an employee may not use his or her position at Lockheed Martin to foster obtaining business courtesies, it is permissible to accept unsolicited meals, refreshments, entertainment, and other business courtesies on an occasional basis, provided:

- The acceptance will foster goodwill and successful business relations;
- The courtesies are not lavish or extravagant under the circumstances;
- The courtesies are not frequent and do not reflect a pattern or the appearance of a pattern of frequent acceptance of courtesies from the same entities or persons; and
- The employee accepting the courtesies would feel comfortable discussing the courtesies with his or her manager or coworker, or having the courtesies known by the public.

It is the personal responsibility of each employee to ensure that his or her acceptance of such meals, refreshments, or entertainment is proper and could not reasonably be construed in any way as an attempt by the offering party to secure favorable treatment.

**It is the personal responsibility of each employee...**

\*(SEE DISCLAIMER ABOVE TABLE OF CONTENTS)

### ***Gifts***

Lockheed Martin employees are not permitted to accept compensation, honoraria, funds or monetary instruments in any form or amount, or any tangible gift (including tickets to sporting, recreational, or other events) that has a market value of \$100.00 or more, from any entity, representatives of any entity, or any person that does or seeks to do business with Lockheed Martin, unless approved by his or her supervisor, and the element's Ethics Officer, who will consult with Legal Counsel, as appropriate. Solicitation of gifts is always prohibited. If you have any questions about the propriety of a gift, gratuity, or item of value, contact your supervisor, Ethics Officer or the Corporate Office of Ethics and Business Conduct for guidance.

#### **Gifts to Lockheed Martin Employees Who Procure Goods or Services**

If you buy goods or services for Lockheed Martin or are involved in the procurement process, you must treat all suppliers uniformly and fairly. In deciding among competing suppliers, you must objectively and impartially weigh all facts and avoid even the appearance of favoritism. For this reason, gifts from suppliers or vendors must not be accepted, except advertising or promotional items of nominal value such as a pen, key chain, water bottle, visor, cup or glass or generally similar items displaying a company's logo. Established routines and procedures should be followed in the procurement of all goods and services.

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### ***Steer Clear of Conflicts of Interest***

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Playing favorites or having conflicts of interest -- in practice or appearance - runs counter to the fair treatment to which we are all entitled. Avoid any relationship, influence, or activity that might impair, or even appear to impair, your ability to make objective and fair decisions when performing your job. A conflict of interest occurs whenever an individual's private interest interferes with the interest of the corporation. We owe a duty to Lockheed Martin to advance its legitimate interests when the opportunity to do so arises. You should never use company property or information for personal gain, or take for yourself personally any opportunity that is discovered through your company position.

Here are some ways a conflict of interest could arise:

- Employment by a competitor or potential competitor, regardless of the nature of the employment, while employed by Lockheed Martin.
- Acceptance of gifts, payment, or services from those seeking to do business with Lockheed Martin.

- Placement of business with a firm owned or controlled by an employee or his/her family.
- Ownership of, or substantial interest in, a company that is a competitor or a supplier.
- Acting as a consultant to a Lockheed Martin customer or supplier.
- Having a personal interest or potential for gain in any company transaction.

Any situation, transaction, or relationship that might give rise to an actual or potential conflict of interest must be disclosed in writing to your manager or supervisor, who will review the disclosure with the Legal Department.

For additional information, consult the [Personal Conflict of Interest/Employee Relationships to Outside Organizations](#) and [Organizational Conflict of Interest](#) CPRs.

**When in doubt, seek the advice of your supervisor, manager, or Legal Department.**

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### ***Know the Follow The Rules In Using or Working With Former Government Officials***

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Extensive conflict of interest laws and regulations govern the employment or use of former military and civilian government personnel. These rules extend to contract or negotiations with current government employees to discuss their potential employment by the company or their use as consultants or subcontractors. Conflict of interest laws and regulations must be fully and carefully observed. When in doubt, consult corporate and company policies and procedures, and seek the advice of your supervisor, manager or Legal Department.

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### ***Maintain the Integrity of Consultants, Agents, and Representatives***

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Business integrity is a key standard for the selection and retention of those who represent Lockheed Martin. Agents, representatives, or consultants must certify their willingness to comply with the company's policies and procedures and must never be retained to circumvent our values and principles. Paying bribes or kickbacks, engaging in industrial espionage, obtaining the proprietary data of a third party without authority, or gaining inside information or influence are just a few examples of what could give us an unfair competitive advantage in a government procurement and could result in violations of law.

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### ***Protect Proprietary Information***

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Proprietary company information may not be disclosed to anyone without proper authorization. Keep proprietary documents protected and secure. In the course of normal business activities, suppliers, customers, and competitors may sometimes divulge to you information that is proprietary to their business. Respect these confidences.

**Keep proprietary documents protected and secure.**

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### *Obtain and Use Company and Customer Assets Wisely*

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Proper use of company and customer property, electronic communication systems, information resources, material, facilities, and equipment is your responsibility. Use and maintain these assets with the utmost care and respect, guarding against waste and abuse, and never borrow or remove them from company property without management's permission. Be cost-conscious and alert to opportunities for improving performance while reducing costs. While these assets are intended to be used for the conduct of Lockheed Martin's business, it is recognized that occasional personal use by employees may occur without adversely affecting the interests of the company. Personal use of company assets must always be in accordance with corporate and company policy -- consult your supervisor for appropriate guidance and permission.

All employees are responsible for complying with the requirements of software copyright licenses related to software packages used in fulfilling job requirements.

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### *Do Not Engage in Speculative or Insider Trading*

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In our role as a multinational corporation and a publicly owned company, we must always be alert to and comply with the securities laws and regulations of the United States and other countries.

**... we must always be alert...**

It is against the law for employees to buy or sell company stock based on material, non-public "insider" information about or involving the company. Play it safe. Do not speculate in the securities of Lockheed Martin when you are aware of information affecting the company's business that has not been publicly released or in situations where trading would call your judgment into question. This includes all varieties of stock trading such as options, puts and calls, straddles, selling short, changes to your 401 (K) account, etc. Two simple rules can help protect you in this area: (1) Do not use non-public information for personal gain. (2) Do not pass along such information to someone else without a need to know.

This guidance also applies to the securities of other companies (suppliers, vendors, subcontractors, etc.) for which you receive information in the course of your employment at Lockheed Martin.

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### ***Business Conduct Compliance Training Modules***

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In order to support a comprehensive Ethics and Business Conduct Program, Lockheed Martin has developed education and communication programs in many subject areas.

The Business Conduct Compliance Training program provides employees with job-specific information to raise their level of awareness and sensitivity to key issues.

Business Conduct Compliance Training modules are available on the following topics:

Antiboycott	Harassment-Free Workplace
Antitrust	Information Protection
Drug-Free Workplace	Insider Trading
Equal Employment Opportunity (EEO)/ Affirmative Action (AA)	Kickback & Gratuities
Ex-Government Employees	Labor Charging
Export Control	Truth in Negotiations Act
Foreign Corrupt Practice Act	

The current list of Business Conduct Compliance Training modules and Corporate Policy Statements relating to the above topics and others can be accessed via the Lockheed Martin Information Network at <http://pageone.global.lmco.com/> or obtained from your supervisor (not applicable to Sandia).

The Business Conduct Compliance Training URL is <http://ethics.corp.lmco.com/ethics/guide.html>. (Available on Sandia's restricted network at <https://wfsprod01.sandia.gov/groups/srn-uscitizens/documents/document/wfs193651.pdf>)

The Corporate Policy URL is <http://policy.global.lmco.com/p3/index.html>. (Available on Sandia's

restricted network at [https://www.prod.sandia.gov/p3/lockmart/index\\_noproxy.html](https://www.prod.sandia.gov/p3/lockmart/index_noproxy.html).)

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### ***Warning Signs - You're On Thin Ethical Ice When You Hear...***

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"Well, maybe just this once..."

"No one will ever know..."

"It doesn't matter how it gets done as long as it gets done."

"It sounds too good to be true."

"Everyone does it."

"Shred that document."

"We can hide it."

"No one will get hurt."

"What's in it for me?"

"This will destroy the competition."

"We didn't have this conversation."

You can probably think of many more phrases that raise warning flags. If you find yourself using any of these expressions, take the Quick Quiz on the following page and make sure you are on solid ethical ground.

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### ***Quick Quiz - When In Doubt, Ask Yourself...***

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1. Are my actions legal?
2. Am I being fair and honest?
3. Will my action stand the test of time?
4. How will I feel about myself afterwards?



5. How will it look in the newspaper?
6. Will I sleep soundly tonight?
7. What would I tell my child to do?
8. How would I feel if my family, friends, and neighbors knew what I was doing?

If you are still not sure what to do, ask... and keep asking until you are certain you are doing the right thing.

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### ***Our Goal: An Ethical Work Environment***

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We have established the Office of Ethics and Business Conduct to underscore our commitment to ethical conduct throughout our company.

The Vice President - Ethics and Business Conduct reports directly to the Chief Executive Officer and the Ethics and Corporate Responsibility Committee of the Board of Directors, and oversees a vigorous corporate wide effort to promote a positive, ethical work environment for all employees.

Our Ethics Officers operate confidential Ethics HelpLines at each operating company, as well as at the corporate level. You are urged to use these resources to report violations of the Code or whenever you have a question or concern that cannot be readily addressed within your work group or through your supervisor.

**Ethics and Integrity are Fundamental to Mission Success.**

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### ***Accountability***

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Each of us is responsible for adherence to the standards of conduct set forth in this Code and for raising questions if we are concerned that these standards are not being met. Violations of the Code are cause for corrective action, which may result in disciplinary action up to and including discharge.

Employees are required to cooperate in Ethics investigations. Failure to cooperate or providing false information is grounds for severe discipline, up to and including termination from employment.

**We are all accountable for adherence to the Code of Conduct.**

## *How to Contact the Audit and Ethics Committee*

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The Audit and Ethics Committee of the Lockheed Martin Board of Directors has created a process by which employees may transmit concerns about accounting, internal controls, or auditing matters to the Audit and Ethics Committee and for the confidential or anonymous submission of concerns regarding questionable accounting or auditing matters. If you wish to raise a question or concern to the Audit and Ethics Committee, you may do so by contacting the Office of Ethics and Business Conduct at Corporate Headquarters. Your concern will be communicated to the Chair of the Audit and Ethics Committee of the Board

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## *Contact the Ethics Office*

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You are encouraged to contact the Office of Ethics and Business Conduct to discuss any ethics question or concern, to report a violation of the Code, or for information on how to contact your company's Ethics Officer. You can reach the Office of Ethics and Business Conduct through any of the following confidential means of communication:

Call: 800-LM ETHICS  
Domestic: 800-563-8442  
International: 800-5638-4427  
For the Hearing or Speech Impaired: 800-441-7457

Write: Office of Ethics and Business Conduct  
Lockheed Martin Corporation  
P.O. Box 34143  
Bethesda, MD 20827-0143

Fax: 301-897-6442

Internet E-Mail: [corporate.ethics@lmco.com](mailto:corporate.ethics@lmco.com)

Note: Caller ID is not used on ethics phone numbers.

When you contact your Company Ethics Officer or the Office of Ethics and Business Conduct at Corporate Headquarters:

- You will be treated with dignity and respect.
- Your communication will be kept confidential to the greatest extent possible.
- Your concerns will be seriously addressed; if not resolved at the time you call, you will be informed of the outcome.

- You need not identify yourself.

Remember, there's never a penalty for using the Ethics HelpLine in good faith. People in a position of authority can't stop you; if they try, they're subject to disciplinary action up to and including dismissal. Lockheed Martin will not tolerate retribution against employees who raise concerns to any source.

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### ***Receipt and Acknowledgement***

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I acknowledge that I have received my personal copy of 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, agent, consultant, or contract worker is responsible for knowing and adhering to the principles and standards of the Code.

Signature

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Print Name

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Employee Number

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Company

---

Location

Date

---

### **Contacts:**

#### **SNL Ethics & Business Conduct Office**

Doug Nordquist: 505-844-9599

Sarah Renfro: 505-845-7120

Anthony Sanchez: 505-844-9341

Helpline: 505-844-1744

(Anonymous)

#### **DOE NNSA Employee Concern Office**

NNSA - Eva Glow Brownlow: 505-845-5113

NNSA - ECP Hotline: 800-688-5713

**Office of Inspector General:** 800-541-1625

**Lockheed Martin Corporation Ethics Office**

Domestic: 800-563-8442

International: 800-5638-4427

Fax: 301-897-6442

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Process Owner: [Doug Nordquist](#) (for content questions)

Web Information Provider, [Juanita Evans](#) (for page design and functionality questions)

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