



ADDENDUM GERMANY

Our Code, as well as this addendum is provided as guidance in conducting your L3 responsibilities. If the Code or this Addendum refers to the female or male form only the other one is always addressed as well. These documents are not intended to be all inclusive. You should seek guidance from your local Ethics Officer as conflicts arise.

The L3 Code of Ethics and Business Conduct (“Code”) applies to everyone who does business on behalf of L3 - employees, officers and members of our Board of Directors. It also applies to agents, consultants, contract labor and others who act on L3’s behalf. Above all, every L3 employee must conduct himself or herself in an ethical manner.

Specifically, everyone who represents L3 will ensure that:

- ✓ Ethical behavior is the foundation by which we conduct our business
- ✓ We do not take advantage, or abuse our position for personal gain or otherwise knowingly violate the law
- ✓ Our actions do not create, directly or indirectly, a conflict of interest
- ✓ We seek guidance when necessary

Requirements

If you are a U.S. citizen working outside of the United States, you are required to abide by United States laws, as well as the laws and regulations of the country in which you are employed. All other individuals may or may not be subject to both U.S. and foreign laws, depending on the circumstances. In situations where you are uncertain about whether a particular law applies, consult with your Manager immediately.

Although most of the Code provisions apply in Germany, there are instances in which German law imposes different requirements. These are described below. In particular, it must be kept in mind that existing shop agreements or individual employment contracts will remain valid and binding insofar as they place further obligations upon the employee.

Federal Acquisition Regulation

Every employee is responsible for keeping the company from incurring damages. Similar to German law, the United States Federal Acquisition Regulation (FAR) contains penalties for companies that – in particular with respect to Government contracts and subcontracts – commit federal criminal law violations. Specifically, the FAR requires mandatory disclosure of credible evidence of federal criminal law violations involving fraud, conflict of interest, bribery, or gratuity violations as well as claims under the Civil False Claims Act and significant overpayments on contracts or subcontracts. This disclosure obligation continues up through three (3) years after contract close-out. If you have the feeling that this is the case in your entity, you are encouraged, and it is expected that you report this to your Ethics Officer or any other competent authority indicated in the Code. Employees who report misconduct are protected from retaliation unless the report is obviously unjustified and malicious.

Providing Gifts and Entertainment

As described in the Code, the Foreign Corrupt Practices Act may have direct consequences for employees in Germany as well in the U.S. In addition, Germany's Criminal Code and its Administrative Offences Act are applicable to German employees, officers and board members. Some provisions of this law go even further than the provisions in the Foreign Corrupt Practices Act. In particular, Germany's Criminal Code may be applicable to criminal acts (in particular bribery, bid rigging and fraud) committed outside of Germany. German Anti-Bribery Provisions do not only sanction bribery of (foreign) public officials but also bribery in private business transactions.

You are not allowed to offer or accept hospitality, gifts or entertainment or other benefits that could appear to improperly influence decisions (including – but not limited to – decisions of public officials). Any benefit must be reasonable in scope, value and frequency, and must reflect ordinary local business customs. We never offer or accept cash or cash equivalents, such as vouchers.

Particular caution must be exercised when dealing with Government officials. As a matter of precaution, benefits (including – but not limited to – gifts, hospitality or entertainment) shall only be offered to public officials subject to the prior approval of the local Ethics Officer.

Further, if you are in any way directly involved with public officials in Germany or in another country, you should seek advice from your manager, the Legal Department, the ABC-Lead or your local Ethics Officer whenever you are uncertain of proper conduct.

Business Partner Compliance We must be careful when retaining third-party intermediaries or agents to represent our interests. L3 has strict approval requirements for engaging such parties as outlined in the Company's policies related to anti-corruption due diligence requirements. Please contact your Compliance department or the Ethics Office if you have questions or are in doubt.

Personal Relationships

Any restraints regarding romantic relationships within a company are unknown to the German legal system. Such a provision would violate the Constitution and be invalid.

However, romantic relationships between senior and subordinate employees may indeed lead to tensions among the staff. In particular the concern may be raised that the subordinate person is no longer judged objectively or even is favored. The following is therefore suggested:

As soon as a romantic relationship exists or develops, the parties are encouraged to consult their manager, the local Ethics Officer or the Corporate Ethics Officer in confidence. The aim of the consultation would be to determine if any conflict of interest may exist and what may be done about this. There will be no sanctions towards employment.

Data Privacy

The privacy and confidentiality of the information entrusted to us have a high priority for us.

We will process data in accordance with the applicable data protection laws and undertake to take appropriate measures for data and IT security.

Protecting Privacy

Other than indicated in the Code, access to employee medical files is permitted only subject

to the requirements of the General Data Protection Regulation and the German Federal Data Protection Act.

Access to personnel records is permitted only to those who are so authorized by the laws of the Federal Republic of Germany. These are - besides the employee - the seniors of the employee and those who have been delegated to keep the records in each case subject to the requirements provided by statutory law.

Avoiding Conflicts of Interest

This Section of the Code applies to German employees as well. Its obligations are, however, confined to the duration of employment.

In the event that the obligations are intended to remain in force following termination of employment, this will have to be agreed individually or provided by law.

Use of Information System Assets

This Section is modified for employees in Germany.

Email services and internet access are provided for business purposes only. We do not use or copy software from company IT systems for private purposes and we do not install private software at the workplace.

All other provisions of this Section remain in full force and effect for everyone who does business on behalf of L3 in Germany. This especially means that the safety precautions must be followed.

Import / Export

The section of the Code on Sanctions, Suspensions and Debarments is only applicable to the extent that such sanctions, suspensions and debarments do not go beyond export control provisions, sanctions and embargoes imposed by the United Nation, the European Union and the Federal Republic of Germany.

German companies and German employees have to observe EU and German import and export regulations as well as sanctions. Inter alia, it is prohibited to issue a declaration in foreign trade and payments transactions whereby our Company participates in a boycott against another country (boycott declaration). Always contact your manager or your export department if you have questions or are in doubt.

Reference to Company Policies

Some sections of the Code refer to company policies for further reference. Should you be unable to obtain the relevant policy in your language please turn to your local Legal Department or Ethics Office for further guidance.

Raising Concerns

For employees in Germany, this Section contains an important modification:

1. L3 Corporate Ethics Office: The L3United States based L3 Corporate Ethics Office is not open for German employees as a reporting avenue. All other local resources including the local Ethics Office can and shall be used as indicated in the Code.

Any concern that has been raised will - especially with regard to the person that brought it forward - be dealt with as confidentially as possible. Anonymous notices are not possible, however, as the rights of those who are the subject of the concern need to be preserved.

Acknowledgement of the L3 Code of Ethics and Business Conduct

The obligations covered by this Code are subject to a Company Directive that your management has passed. Although it is not required, L3 would highly appreciate your re-affirming your commitment to our Code by signing the acknowledgment statement on the back flap of the L3 Code of Ethics and Business Conduct book.