



## **ADDENDUM PORTUGAL**

Our Code, as well as this addendum (the “Addendum”) is provided as guidance in conducting your L3 responsibilities. These documents are not intended to be all inclusive. You should seek guidance from the Legal Department as conflicts arise.

The L3 Code of Ethics and Business Conduct (“Code”) applies to everyone who does business on behalf of L3, including employees, officers and members of our Board of Directors. L3 also expects that all third parties with whom L3 contracts, including agents, suppliers, contractors, consultants and others will act in accordance with the principles outlined in the Code when acting 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 or the Legal Department immediately.

This Addendum describes specific areas of Portuguese law that either substitute for or complement the existing requirements of the Code and is meant to be read in conjunction with the Code.

Where this Addendum is silent, or in the absence of any explicit Portuguese alternative, Portuguese employees are required to follow the Code.

### **Personal Data: Employees information**

The personal data contained in the application form of the employees and all personal data collected in connection with the performance of the employment agreement, including the personal data contained in the self-assessment forms, the name, Citizen's Card or Passport, vat number, address, telephone numbers, date of birth, education or other qualifications ("Personal Data") will be included in automated or manual files by L3.

Personal Data shall be processed for the purpose of management of the individual process of the employees as well as for the full compliance with the contractual and legal obligations of L3. The main purposes are: administrative management, human resources, work travel, traveling processing, occupational medicine, occupational accident insurance policies, training and billing management.

L3 is the owner of the processing data and guarantees the confidentiality of the data. L3 processes personal data exclusively for the purposes mentioned in the previous number.

Personal data shall be retained only for the period necessary for the purposes for which they are processed. Data will be retained until one year after the termination of the employment agreement, except in the case of pending judicial proceedings, up to a maximum of six months after the final decision or to comply with legal obligations.

Personal data provided to L3 shall be correct and updated.

Data subjects have the right to access, rectify and /or erase personal data, as well as the right to object the processing, by contacting the L3 Legal Department.

Data subjects also have the right to enforce data portability and to limit processing, in the terms admissible according to applicable law.

If the data subjects consider that the processing of personal data carried out by L3 infringes personal data protection laws and regulation, data subjects have the right to lodge a complaint with the supervisory authority.

L3 may share personal data to the following entities: Authority for the Conditions of Work; National Commission for the Protection of Personal Data, Banking Institutions, Travel Agencies and Insurance Companies, as well as to any other entities, to comply with legal obligations.

L3 may transfer or communicate the Personal Data to other companies within L3.

### **Use of Company's Information Systems**

As a general rule, the use of Company's information systems, namely the use of e-mail, should be only for professional purposes. However, it may be used occasionally for personal purposes. In this case, the use must be appropriate, i.e., the use is not excessive nor disruptive to the workplace.

The Company will respect the employee's right to confidentiality regarding the content of personal messages and access to non-professional information that is sent and/or received through professional email accounts. The employer will not have access to the content of personal messages without the employee's consent.