



ADDENDUM UNITED KINGDOM

Introduction

Our Code, as well as this 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 - employees, officers and members of our Board of Directors. L3 also expects that all third parties with whom we contract, including agents, suppliers, and contractors, will act in accordance with the principals outlined in the Code when conducting business 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 under the laws of the United Kingdom that complement the existing requirements of the Code and is meant to be read in conjunction with the Code.

Confidential Information

Under English law a term is implied into the contracts of employment of all employees (whether or not a written contract is in existence) to the effect that at all times during and after the

termination of their employment they must not disclose to any unauthorized person or divulge or otherwise use any trade secrets or confidential information of or about their employer. To do so constitutes a breach of contract in respect of which the Company may be entitled to claim damages.

Confidential information includes trade secrets, customer lists, trading details or other information of a confidential nature relating to the Company such as but not limited to details of its activities, businesses or finances, any information regarding L3's personnel or operations and in particular any personal information regarding L3's personnel or any other information notified to staff as confidential and information in relation to which the Company owes a duty of confidentiality to a third party, such as payroll details of other employees.

Upon termination of employment (for whatever reason) employees must return to L3 all confidential information and other documents (without retaining any copies) and any other property belonging to it, which came into their possession during their employment.

Misuse or unauthorized disclosure of confidential information is a serious matter and may lead to disciplinary action including summary dismissal.

Fair Treatment and Non Discrimination

Under English law it is unlawful to discriminate against job applicants, employees and customers based on their:

-) age;
-) disability;
-) gender reassignment;
-) marriage and civil partnership;
-) pregnancy and maternity;
-) race;
-) religion or belief;
-) sex;
-) sexual orientation (under English law, the "Protected Characteristics").

L3 will be and it expects its staff to be responsible for ensuring that all job applicants, employees and customers are treated in the same way regardless of their Protected Characteristics. Failure to do so will be a disciplinary offence and may lead to dismissal. Managers and others involved in the Company's recruitment, assessment and promotion processes must take particular care to ensure the reality of the statement that L3 is an equal opportunities employer. L3 is entitled to recruit, retain and advance the people it considers to be of the highest quality but it must make that assessment so far as possible on objective grounds and without reference to personal biases or irrelevant criteria.

In some circumstances English law imposes an obligation on an employer to make 'reasonable adjustments' to its usual practices, procedures or criteria in order to avoid or minimise their adverse impact on people suffering from a disability, whether job candidates or existing employees. If in

doubt, employees tasked with managing or recruiting an individual who may be disabled should contact Human Resources.

Harassment

L3 believes that everyone working for it has the right to be treated with reasonable dignity, fairness, and courtesy. We are committed to maintaining a workplace that is supportive of effective job performance and free from unlawful harassment and discrimination. Anyone who experiences or witnesses any type of harassment should report it immediately. Complaints that are upheld may lead to disciplinary action and may, where serious, constitute gross misconduct which can lead to summary dismissal.

This policy applies to all permanent, full and part time staff and to all temporary or contract staff whether or not they are directly employed by L3 or their services are contracted and irrespective of their length of service or duration of the contract.

L3 will not tolerate unlawful harassment of any type, including physical, emotional or sexual harassment. The prohibition on harassment extends beyond co-workers to include suppliers, customers, and anyone else who does business with the Company.

Harassment can be described as uninvited conduct that affects an individual's dignity at work or creates an offensive or otherwise hostile work environment. It may occur in the form of physical, verbal, or non-verbal conduct (including emails and images of an inappropriate nature). Examples of harassment may include, but are not limited to: assault or threatened assault; bullying; ostracizing, ignoring, or making fun of individuals based on their Protected Characteristics, including sexual remarks, threats, gestures, or requests for sexual favors; unwelcome or inappropriate touching; and other verbal or physical threats of any type. The defining feature is that the behaviour is unwanted by the recipient.

All staff, but particularly those employed in supervisory or managerial capacities, are responsible for ensuring that their conduct towards colleagues is not open to misrepresentation. L3 will not be impressed by “it was only a bit of fun” or similar defences to allegations of harassment. You should not forget that your behavior and sense of what is proper may be affected by external factors such as pressure at work or fatigue – you must be particularly careful about what you say or do in these circumstances.

However, nothing in L3’s prohibition on harassment prevents ordinary interactions between managers and subordinates in terms (for example) of the issuance of instructions and the right, where it is reasonably thought appropriate, to reprimand or impose disciplinary or performance monitoring or management measures.

Victimisation

Employees should be able to use this policy safe in the knowledge that they will not be subject to any less favourable treatment (“victimisation”) because they have pursued a complaint of discrimination. If an individual brings a good faith complaint or assists another to bring a

complaint, even if that complaint is not upheld, he or she should not be victimised. Conduct based on the fact that an individual brought a discrimination complaint could amount to harassment in itself and will not be tolerated. However, please note that protection against victimisation does not apply if the complaint or allegation is made in bad faith. Making a malicious complaint about a colleague (including for one's own personal advantage) i.e. to deflect from genuine performance concerns or misconduct on the complainant's part may constitute serious misconduct, potentially justifying dismissal.

Complaints

Employees who consider they have been harassed or victimised in any way are encouraged to resolve the issue informally at first, if appropriate. Employees should as soon as possible after the incident, make clear to the offender(s) that the behaviour is unwelcome and that it makes them uncomfortable or offends them and they want it to stop.

Where actions are of a type or seriousness that informal resolution is not appropriate or if the employee concerned does not feel that the matter can be resolved informally for whatever reason, a formal written complaint should be lodged with Human Resources. This should contain as many supporting details (names, dates, times, etc.) as practicable, as it will make a focused investigation easier. The complainant employee should ideally also indicate what outcome/remedy he/she seeks from making the allegation.

The complaint will be treated in confidence, so far as it is reasonably practicable to do so, but it may be necessary to inform the individuals who are the subject of the allegation(s) and / or any witnesses in order to investigate and deal with the complaint effectively. If appropriate any action taken will follow L3's disciplinary procedure.

Security

Under the Computer Misuse Act 1990 it is a criminal offence to:

-) gain unauthorized access to computer material;
-) gain unauthorized access with intent to commit or facilitate the commission of further offences; or
-) make unauthorized modifications to computer material.

To avoid criminal liability under this Act, employees using L3's computers or IT should ensure that they comply with L3's policies and procedures concerning email and internet use. In particular employees should ensure they have the requisite authority at all times to access (or modify) the particular data or class of data in question.

All disks and CD-Roms should be virus checked by L3 before loading on to L3's computers or systems. Downloading programs, systems updates or other software from any source without permission is expressly forbidden.

Use of Information System Assets

L3 has the right to expect that its communications systems will not be used inappropriately. It may therefore monitor employees' use of telephone, internet and email facilities to:

-) ensure compliance with L3's practices and procedures (including but not limited to this policy);
-) ensure that employees achieve acceptable standards in relation to the performance of their duties and observance of L3's policies and procedures; prevent or detect crime;
-) investigate or detect the unauthorised use of L3's telephone, internet and email systems;
-) ensure the effective operation of the telephone, internet and email systems e.g. virus checking.

E-mail communications will also be randomly monitored. However if it appears to L3 that email is being abused or used inappropriately it may monitor email communication more specifically, which may include opening any emails received by employees to monitor their contents.

Gifts and Entertainment with U.K. Government Representatives

Like the United States, U.K. government agencies have strict prohibitions against their employees accepting gifts, money, free loans, discounts on purchases, invitations to sporting or cultural events, offers of hospitality, holidays or transport costs. Any permitted gifts of a seasonal or trivial nature will be provided by the Company.

Bribery and Improper Payments

English law prohibits bribery. Under the Bribery Act 2010, U.K. enforcement authorities have jurisdiction over bribery-related offenses that occur in the U.K., as well as those that occur outside of the U.K. where the offense itself or the individual or company involved has sufficient links to the U.K. (e.g., U.K. citizens, U.K. residents, U.K. companies). The Bribery Act is similar to the FCPA in some respects, but also broader than the FCPA in several ways, e.g. the FCPA, the Bribery Act prohibits individuals and companies from bribing foreign government officials either directly or indirectly. Note that, for purposes of the Bribery Act, foreign government officials would include U.S. government officials.

Unlike the FCPA, the Bribery Act also covers purely domestic bribery, *i.e.* the bribery of U.K. government officials. In addition, also unlike the FCPA, the Bribery Act covers private-to-private (commercial) bribery. The Bribery Act prohibits both the offering or giving of bribes and the solicitation or receipt of bribes. Its general bribery offenses prohibit a person from promising or giving, directly or indirectly, a financial or other advantage to another person, intending to induce or reward the improper performance of a relevant function or activity. A relevant function or activity includes any public function, or any activity connected with a business or performed in the course of a person's employment.

The Bribery Act also makes it a criminal offense for a company that conducts business in the U.K. to fail to prevent bribery. A company can be held liable when a person associated with the company, such as an employee, agent, advisor, contractor, intermediary, or representative, bribes another person (whether a government official or a commercial counterparty) intending to obtain

or retain business or a business advantage for the company, even if the company and its employees had no knowledge of the bribe. The only defence available to this kind of charge is that L3 had in place adequate procedures designed to prevent persons associated with it from engaging in such conduct. Therefore, it is imperative that employees follow L3's anti-corruption policies and procedures.

Finally, unlike the FCPA, the Bribery Act does not include an exception for facilitating payments, *i.e.* small payments made to low-level government officials to induce them to perform routine government functions where otherwise they may not be inclined to do so. L3's Code of Conduct strictly prohibits L3 employees from making facilitating payments, and any L3 employee who is asked to make such a payment should immediately contact the Ethics Office.

Mandatory Obligation to Disclose Certain Misconduct

The United States Federal Acquisition Regulation (FAR) requires the mandatory disclosure of credible evidence of US federal criminal law violations involving fraud, conflict of interest, bribery, or gratuity violations, as well as claims under the US Civil False Claims Act, and significant overpayments. This mandatory disclosure obligation continues up through three (3) years after contract close-out. In order to comply with these obligations, all L3 employees must immediately report any issues that could potentially constitute a violation of criminal or civil law, or significant overpayment on a US Government contract or subcontracts, to your responsible Ethics Officer or the Corporate Ethics Officer. You may also report these matters through the Ethics Helpline. Reporting of these matters is mandatory, although you may use the Ethics telephone helpline if you prefer to remain anonymous.

Failure to report potential or ethical violations, overpayments or similar issues will be regarded as serious and may lead to disciplinary action including summary dismissal.

Raising Concerns

In addition to the mandatory reporting obligations referred to above, we seek to foster a working environment that encourages all of us to discuss concerns about possible violations of our standards of business conduct. The "Raising Concerns" section of the Code presents a number of ways in which you can raise concerns, including several confidential means.

Money Laundering

Employees should be aware that English law has strict money laundering regulations. Any employee involved in handling any third party funds should seek guidance from the Legal Department on the reporting and other requirements under the U.K. money laundering regulations.

L3 and its agents or employees could be exposed to a charge of money laundering if they receive the proceeds of a crime. This would include profits from a contract obtained through the payment or offer of payment of a bribe. Even if L3 or its employees or agents have not been involved in the solicitation or payment of the bribe, a disclosure may need to be made under the U.K. money laundering regulations and guidance from the Legal Department should be sought.

Data Protection (Protecting Privacy)

L3 will collect and process information relating to the Employee in accordance with the privacy policy which is located at the following links:

ASA: <https://www.L3asa.com/privacy-policy/>

Airline Academy: <https://www.l3airlineacademy.com/privacy>

Commercial Aviation: <https://www.l3commercialaviation.com/privacy-policy/>

CTI: <https://www.l3cts.com/privacy>

ExMac Automation: <http://www.exmac.co.uk/wp-content/uploads/2012/09/External-Data-Statement-Privacy-Policy-EXMAC-FINAL.pdf>

MacDonald Humfrey Automation:

https://www.mhalt.co.uk/sites/default/files/External%20Data%20Statement%20Privacy%20Policy%20-%20MHA%20FINAL_JB.pdf

TRL Technology: <https://www.trltech.co.uk/privacy-cookies.aspx>

Employees shall comply with the L3 Privacy Policy when handling personal data in the course of employment including personal data relating to any employee, worker, contractor, customer, client, supplier or agent of the Company.

Failure to comply with the L3 Privacy Policy may be dealt with under our disciplinary procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.