

## ANTI-CORRUPTION POLICIES

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### Global Anti-Corruption Policy (LGL-35)

- L3Harris policy is to conduct global business ethically, transparently and complying with the anti-corruption laws in all countries in which it operates. This policy prohibits L3Harris, its affiliates, employees and any party who performs work on behalf of L3Harris from engaging or participating in bribery, kickbacks or other forms of improper influences. Training is the foundation of any successful anti-corruption program. L3Harris requires that all employees receive anti-corruption training at hire and periodically thereafter. Targeted in-person and/or function-specific, anti-corruption training may also be provided.
- Corporate Policy LGL-02 Policy Maintenance requires L3Harris to review and update, as necessary, all policies every two years.

### Anti-Corruption Manual (LGL-35.01 & Procedure 706)

- Provides employees with guidance on issues relevant to conducting international business with foreign (non-U.S.) government officials and commercial (nongovernment) customers.
- Implements a tiered Global Due Diligence review process based upon risks identified for L3Harris third parties, including international representatives, agents, dealers, distributors, consultants and business partners that conduct or are likely to conduct business with foreign government and foreign commercial customers, officials or employees.
- Requires anti-corruption self-assessments and an anti-corruption risk assessment on an annual basis. The results of these assessments inform the scoping of anti-corruption audits or reviews on selected business areas to assess anti-bribery, anti-corruption risks and identify and remediate control gaps. Significant audit findings are presented to the audit committee of the board of directors with management corrective actions outlined. Based upon results, changes may be made to existing practices.

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## **Conflicts of Interest (L3Harris Policy HR-03 Employment and Legacy Harris Policy 00-LGL-02 Conflict of Interest)**

- Employees are required to recognize any activities, situations or relationships that would influence or appear to influence their ability to make objective and ethical business decisions on behalf of L3Harris and disclose the conflict or potential conflict of interest as required.
- Potential or actual conflict of interest declarations are reviewed and overseen by human resources and ethics & compliance with ultimate accountability for its implementation and handling of individual cases.
- Sets forth L3Harris' hiring practices, including L3Harris legal review to ensure compliance prior to hiring former government officials.

## **Providing and Receiving Business Courtesies (LGL-37)**

- Requires that gifts and hospitality be offered, given and received in strict compliance with all applicable laws and regulations, including anti-corruption laws. Pre-approval is required before most business courtesies can be provided to government officials and other third parties with whom L3Harris does business. LGL-37.01 establishes dollar thresholds as to what L3Harris employees are allowed to provide to these recipient types and when segment or corporate legal approval is required.
- Adopted Business Courtesy Request System, which is a dedicated tool for tracking all gifts and hospitality to government officials and commercial customers above designated thresholds.

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### **Use of Third Parties Operating Outside the United States (LGL-38)**

- Sets forth the requirements for risk-appropriate due diligence, agreements, monitoring, payment review, record-keeping and reporting for third parties that pose heightened anti-corruption (AC) risk for L3Harris, its subsidiaries, certain affiliates and employees. Third parties subject to heightened due diligence may include: vendors, suppliers, subcontractors, partners, advisors, intermediaries, resellers and any party providing services to or on behalf of L3Harris. L3Harris requires its suppliers and other third parties to comply with the L3Harris Supplier Code of Conduct. L3Harris conducts periodic renewal reviews of its third parties, including enhanced monitoring for higher risk third parties.
- It is L3Harris policy to sustain an effective process for managing third parties and to establish strong internal controls consistent with L3Harris' Code of Conduct, L3Harris' Supplier Code of Conduct and applicable laws and regulations, particularly the FCPA, the International Traffic in Arms Regulations (ITAR), the Export Administration Regulations (EAR), Office of Foreign Assets Control (OFAC) Sanctions for Specially Designated Nationals and Blocked Persons, and all applicable non-U.S. laws and regulations, including the UKBA and Canadian Corruption of Foreign Officials Act. U.S. laws prohibiting domestic corruption include, but are not limited to, the False Claims Act and the Anti-Kickback Act of 1986.
- Tiered due diligence is performed based on an assessment of the potential anti-corruption risk as set forth in the Global Anti-Corruption Procedures LGL-35.1. L3Harris reviews the legitimate business need and rationale, and proposed compensation structure, along with the qualifications of the third party to perform proposed/contemplated services before engaging the third party. L3Harris establishes ultimate beneficial ownership, which is independently verified, based upon the third party's assessed risk. L3Harris will conduct renewal reviews as stipulated in LGL-35.1 or as needed based upon risk posed by the third party.
- As covered in Corporate Policy LGL-35 Global Anti-Corruption, bribery and kickbacks are prohibited regardless of whether an L3Harris employee or third party is dealing with a government or commercial customer or employee, and irrespective of the location of the parties to the transaction. L3Harris commits to not engaging or terminating its engagement with third parties that engage in improper conduct. L3Harris' agreements with its intermediaries contain mandatory clauses for anti-bribery and corruption, audit rights, termination triggers and other contractual mechanisms to monitor and enforce compliance.

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### **Offset Obligations (BD-02) and Use of Third Parties Operating Outside the U.S. (LGL-38)**

- Sets forth the requirements for L3Harris and the program teams to prepare for and execute any offset obligation or other industrial commitment. The Global Business Development team, with support from corporate contracts, is responsible for administering and ensuring compliance with this policy.
- Third parties involved in offset transactions must undergo an enhanced third-party due diligence review in accordance with LGL-38 and the anti-corruption procedures.

### **Political Advocacy (GR-01) and State and Local Government Lobbyists (GR-02)**

- Sets forth the requirements for U.S. political advocacy and contributions. All L3Harris segments and functions are required to work with and through the L3Harris Government Relations Office before engaging a lobbyist or having contact with any member of Congress, Congressional staff, or certain covered executive agency officials.
- The L3Harris Government Relations Office is solely responsible for coordinating and approving all political advocacy, lobbying and contributions by or on behalf of L3Harris at the federal, state and local levels. Any request of a political nature for support and interaction by L3Harris must be referred to the L3Harris Government Relations Office for review and consideration.
- U.S. law and L3Harris policy prohibits use of L3Harris' funds or other assets for contributions to, or support of, candidates for U.S. Federal office, except in certain limited circumstances permitted by law and in coordination with the L3Harris Government Relations Office and legal. In addition, use of L3Harris' funds or assets for contributions to U.S. state and local candidates for office or for any political party, political committee, position or ballot issue is highly regulated and must be approved in advance pursuant to this policy. L3Harris employees must comply with Corporate Policy LGL-35 Global Anti-Corruption before providing any contributions or donations to foreign (non-US) government officials on behalf of L3Harris or in an official capacity.
- Any activity related to lobbying at the state and local level, including the hiring of outside lobbyists, must also comply with L3Harris Policy GR-02 State and Local Government Lobbyists.
- L3Harris complies with all annual lobbying disclosures required by U.S. law.

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## Supply Chain (SC-01)

- Sets forth the guidelines for the purchase of materials and services as well as entering into commercial agreements with suppliers on behalf of L3Harris. These guidelines include the vendor due diligence requirements. The corporate and segment organizations within the supply chain are responsible for performing all procurement activities and ensuring compliance with this policy. This policy applies to all employees of L3Harris and serves as the minimum standard for global procurement operations.
- L3Harris' policy is to obtain the best value for all goods and services purchased and to maintain the highest ethical standards in dealing with suppliers.
- L3Harris requires its suppliers' subcontractors to comply with all applicable local, state, federal, provincial and foreign statutes, permits, orders, rules, regulations, ordinances, guidelines, directives and/or regulations.
- L3Harris requires suppliers to abide by the L3Harris Supplier Code of Conduct. The L3Harris Supplier Code of Conduct sets our expectations for compliance. We encourage our suppliers to flow-down the Supplier Code of Conduct to their corresponding suppliers.

L3Harris is committed to its values, and if an employee has any concerns or questions about doing the right thing, they should report it to their supervisor or other L3Harris resource. L3Harris has dedicated Ethics & Compliance Review Boards, comprised of L3Harris management, to review matters reported via any L3Harris resource. L3Harris is confident that employees report concerns and that L3Harris is taking action based upon the L3Harris reporting average.