

## DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

### FINAL ASSESSMENT

#### L3HARRIS TECHNOLOGIES INC.

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	8/8
2. Internal Controls	6	8/12
3. Support to Employees	7	8/14
4. Conflict of Interest	4	4/8
5. Customer Engagement	7	4/14
6. Supply Chain Management	5	6/10
7. Agents, Intermediaries and Joint Ventures	10	9/20
8. Offsets	4	2/8
9. High Risk Markets	4	4/8
10. State-Owned Enterprises	0	N/A
<b>TOTAL</b>		<b>53/102</b>
<b>BAND</b>		<b>C</b>

\*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

## 1. Leadership and Organisational Culture

<b>Question</b>
<b>1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
The company publishes a clear statement in support of high ethical standards and integrity, which is signed by its Chairman and CEO. This commitment appears in the company’s Code of Conduct, which contains the company’s anti-corruption policy that applies all employees within the organisation.
<b>Evidence</b>
<p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.3] MESSAGE FROM OUR CHAIRMAN &amp; CEO</p> <p>Our values serve as the foundation for our success. Acting with INTEGRITY in all our business dealings, exhibiting EXCELLENCE by delivering on our commitments, and demonstrating RESPECT to those we interact with—these are all essential to maintaining a lasting and solid reputation.</p> <p>This Code of Conduct highlights critical policies and regulations that impact our business operations—that we are all expected to adhere to every day. Adhering to our Code, our policies, and the law is non-negotiable—and it's a condition of employment. If you are ever in doubt about the right course of action—or observe an action inconsistent with our values—you are empowered to raise the issue with your supervisor or the many other L3Harris Resources available to you. You can do this with complete confidence because L3Harris does not tolerate retaliation against anyone for asking questions or raising concerns.</p> <p>We must maintain an unwavering commitment to high ethical standards, and never compromise our values in order to achieve business objectives. Our customers, shareholders, suppliers, and communities expect nothing less. Thank you for your commitment to living our values every day.</p> <p>Sincerely,</p> <p>BILL BROWN</p> <p>Chairman &amp; Chief Executive Officer</p> <p>[p.6] OUR CODE OF CONDUCT</p> <p>Our Code of Conduct (“Code”) describes our commitment to our values, summarizes the essential policies, laws, and regulations that we need to know while working for L3Harris, and is our guide to ethical decision-making. Making ethical decisions is essential to how we work with each other, with our customers and business partners, and within our global community</p> <p>[p.17]</p> <p>PREVENTING BRIBERY, CORRUPTION, AND KICKBACKS</p> <p>As L3Harris employees, regardless of where in the world we live and work, we must all comply with the U.S. Foreign Corrupt Practices Act (“FCPA”), the United Kingdom Bribery Act (“UKBA”), and the anti-corruption laws of the countries in which we operate. Employees are prohibited from offering, giving, soliciting or accepting any bribe or kickback, whether dealing with government officials, political parties or representatives of commercial organizations. This means that we:</p>

- Conduct due diligence when hiring or managing third parties as we can be held liable for their actions
- Accurately record all payments and transactions
- Never give, offer, accept, or promise anything of value that may be construed as illegal or improper
- Prohibit facilitation payments unless someone’s safety or welfare is at stake or advance approval from L3Harris’ Legal Department is obtained
- Prohibit offering or giving anything of value to a foreign official for the purpose of improperly influencing decision-making
- Do not engage in financial transactions that, directly or indirectly, promote or result from criminal activity, including false invoices, unauthorized payments to offshore banking locations or unauthorized payments to third parties outside the territory in which the third party operates
- Do not become involved in financing, supporting, or assisting any terrorist person, activity, or organization

“Bribe” is not limited to cash payments, but anything of value, including gifts, entertainment, hospitality, travel or other favors offered, given, solicited or received for an improper purpose.

“Kickback” is providing or receiving something of value either to obtain or reward favorable treatment on a government contract or subcontract.

“Facilitation or grease payment” is a payment of cash or the provision of a small gift to a low-level government official to speed or initiate the performance of expected government service to which L3Harris is entitled. Facilitation payments do not include payment of established fees for government services.

**[11] Ethics - Our Program – Video (Webpage)**

Accessed 04/10/2019

<https://www.l3t.com/video/l3-ethics-our-program>

# L3 Ethics: Our Program



[Video in which Vice President and Corporate Ethics Officer provides overview of Ethics Programme]

<b>Question</b>
<p><b>1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories:</b></p> <p><b>a) All employees, including staff and leadership of subsidiaries and other controlled entities;</b></p> <p><b>b) All board members, including non-executive directors.</b></p>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company publishes a Code of Conduct, which explicitly prohibits bribery, payments to public officials, commercial bribery and facilitation payments. The company indicates that its policy applies to all employees and board members as described in (a) and (b) in the question.</p>
<b>Evidence</b>
<p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a></p> <p>[p.6] Our Code applies to L3Harris employees, officers and members of the Board of Directors. Following the Code is mandatory. We all have an obligation to comply with our Code, our policies and the laws where we do business. Violations are taken seriously at L3Harris and may result in disciplinary action, up to and including termination of employment.</p> <p>As the Code cannot address all of the applicable laws and regulations, please seek guidance from the appropriate L3Harris Resource whenever questions arise.</p> <p>We also expect all third parties with whom we contract, including agents, suppliers and contractors, to comply with the L3Harris Supplier Code of Conduct when conducting business on L3Harris' behalf.</p> <p>[p.8] OUR RESPONSIBILITIES</p> <p>We all have a responsibility to live the L3Harris' values and we will:</p> <ul style="list-style-type: none"> <li>• Be accountable for our own conduct</li> <li>• Comply with the policies, laws, and regulations that apply to our jobs</li> </ul> <p>[p.13] WORKING WITH THE U.S. AND OTHER GOVERNMENTS</p> <p>In all of our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including, but not limited to, agents, business partners, subcontractors, and other third parties. The rules for providing products, services and solutions to the government or other public sector entities may be more complex and considerably stricter than those that govern our work with commercial customers. Working with governments means that we:</p> <ul style="list-style-type: none"> <li>• Maintain the highest levels of procurement integrity</li> <li>• Provide accurate submissions of time charging and other costs</li> <li>• Understand and avoid organizational conflicts of interest</li> <li>• Do not hire former government employees without authorization</li> <li>• Avoid kickbacks, bribes and illegal or unethical commissions</li> </ul> <p>[p.17] PREVENTING BRIBERY, CORRUPTION, AND KICKBACKS</p> <p>As L3Harris employees, regardless of where in the world we live and work, we must all comply with the U.S. Foreign Corrupt Practices Act ("FCPA"), the United Kingdom Bribery Act ("UKBA"), and the anti-corruption laws of the countries in which we operate. Employees are prohibited from offering, giving, soliciting or accepting any bribe or kickback, whether dealing with government officials, political parties or representatives of commercial organizations. This means that we:</p> <ul style="list-style-type: none"> <li>• Conduct due diligence when hiring or managing third parties as we can be held liable for their actions</li> <li>• Accurately record all payments and transactions</li> </ul>

- Never give, offer, accept, or promise anything of value that may be construed as illegal or improper
- Prohibit facilitation payments unless someone’s safety or welfare is at stake or advance approval from L3Harris’ Legal Department is obtained
- Prohibit offering or giving anything of value to a foreign official for the purpose of improperly influencing decision-making
- Do not engage in financial transactions that, directly or indirectly, promote or result from criminal activity, including false invoices, unauthorized payments to offshore banking locations or unauthorized payments to third parties outside the territory in which the third party operates
- Do not become involved in financing, supporting, or assisting any terrorist person, activity, or organization

“Bribe” is not limited to cash payments, but anything of value, including gifts, entertainment, hospitality, travel or other favors offered, given, solicited or received for an improper purpose.

“Kickback” is providing or receiving something of value either to obtain or reward favorable treatment on a government contract or subcontract.

“Facilitation or grease payment” is a payment of cash or the provision of a small gift to a low-level government official to speed or initiate the performance of expected government service to which L3Harris is entitled. Facilitation payments do not include payment of established fees for government services.

**[6] Proxy Statement 2019 (Document)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/L3Harris-2019-Proxy-Statement.pdf>

[p.25] CODE OF CONDUCT

All L3 Harris employees, officers and directors are required to abide by our Code of Conduct to help ensure that we consistently conduct our business in an ethical and legal manner. Our Code of Conduct is an important component of a comprehensive ethics and compliance program that includes compliance with all laws and corporate policies and procedures, an open relationship among employees that contributes to good business conduct, and an abiding belief that we should conduct all business dealings with integrity, honesty and responsibility.

[...]

Our Code of Conduct covers a broad range of topics, including:

[...]

Avoiding conflicts of interest

[...]

Preventing bribery and corruption

[...]

Political activities and lobbying

[...]

Corporate responsibility

**[7] 2019 Annual Report (Document)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf>

[p.124] (e) Code of Ethics:

All of our directors and employees, including our Chief Executive Officer, Chief Financial Officer, Principal Accounting Officer and other senior accounting and financial officers, are required to abide by our Code of Conduct.

**[9] Corporate Governance Guidelines (Webpage)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/corporate-governance-guidelines.pdf>

[p.12] (e) Code of Conduct.

The Company maintains a Code of Conduct which sets forth the Company's commitment to integrity and ethical behavior in all aspects of its business activity. The Code of Conduct is applicable to all of the Company's directors, officers and employees, all of whom are required to periodically verify their awareness of, and compliance with, the Code of Conduct. The Nominating and Governance Committee has oversight responsibility for the Code of Conduct.

#### **[1] Anti-Corruption Introduction and Policy Overviews (Webpage)**

Accessed 03/10/2019

<https://www.l3t.com/anti-corruption-statement/anti-corruption-statement>

L3 has a comprehensive compliance program with established policies, procedures, training, and internal controls to ensure that its business activities reflect the highest levels of ethical conduct. The policies and procedures are reviewed on an ongoing basis to identify areas in need of improvement, and they are updated as necessary and appropriate. Policies, procedures, training, and related internal controls are also tested on an ongoing basis by Internal Audit and the departments governing the policies. The following overviews describe the spirit of the policies that serve as the foundation for ethical business practices and anti-corruption compliance.

[...]

#### **Corporate Policy 709**

This policy sets forth the ethical standards of conduct and practices that must be followed by L3 in conducting international business. L3 prohibits public and private sector bribery in accordance with the U.S. FCPA, the UK Bribery Act, and other laws enacted pursuant to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. The policy's related procedures outline the detailed steps and approvals required for training, hospitality, and appropriate record-keeping. L3 policy prohibits facilitation payments.

<b>Question</b>
<b>1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that a designated board committee – the Nominating and Governance Committee – is responsible for providing oversight of the company’s anti-bribery and corruption programme. There is evidence that the committee’s responsibilities include reviewing reports from management on the programme’s performance and it is clear that it has the authority to require that changes are made.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>  The Nominating &amp; Governance Committee oversees L3Harris’ compliance with the goals and objectives set forth in the L3Harris Code of Conduct. L3Harris policy management requires that all policies must be reviewed and modified at a minimum of every two years, if necessary, to help ensure they are current and accurate.</p> <p><b>[10] Nominating and Governance Committee Charter (Document)</b>  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf">https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf</a>  [p.1] L3HARRIS TECHNOLOGIES, INC. NOMINATING AND GOVERNANCE COMMITTEE OF THE BOARD OF DIRECTORS CHARTER</p> <p>I. PURPOSES.</p> <p>The purposes of the Nominating and Governance Committee (the “Committee”) of the Board of Directors (the “Board”) of L3Harris Technologies, Inc. (the “Company”) are to:</p> <p>[...]</p> <p>7. assist the Board in fulfilling its responsibilities to oversee the Company’s:</p> <p>(a) ethics and business conduct program,  (b) compliance with sound ethical business practices and legal requirements, and  (c) compliance with the goals and objectives set forth in the Company’s Code of Conduct;</p> <p>8. review and take appropriate action concerning processes, standards and controls within the Company regarding compliance with the Company’s Code of Conduct;</p> <p>[p.2] 10. review the Company’s support of charitable, civic, educational and philanthropic contributions and activities, directly or through the L3Harris Foundation or otherwise;</p> <p>[...]</p> <p>III. DUTIES AND RESPONSIBILITIES.</p> <p>To carry out its purposes, the Committee shall have the following duties and responsibilities:</p> <p>[p.5] 2. With respect to ethics, business conduct, environmental, health and safety or other corporate responsibility matters:</p> <p>(i) oversee the Company’s ethics and business conduct program consistent with sound, ethical business practices and legal requirements applicable to the Company;</p> <p>(ii) review audits and investigation results concerning compliance with the ethics and business conduct program and the Company’s Code of Conduct, including reports from the General Counsel, Director of Ethics and Compliance and other employees, as appropriate, and recommend to the Board, as</p>

- appropriate, such measures and actions as may be appropriate from the results of such audits or investigative results;
- (iii) consult with independent legal counsel, consultants, experts or other Advisers (as defined below) or in-house legal counsel, as the Committee deems appropriate, including the Company's General Counsel, head of Internal Audit, Director of Ethics and Compliance or Director of Environmental, Health and Safety in matters relating to the Company's ethics and business conduct program or environmental, health and safety programs;
  - (iv) recommend to the Board, as appropriate, such measures and actions that the Committee believes may be appropriate and necessary to assure the continued conduct of the Company's activities and business within the parameters of legal compliance and sound, ethical business practices;

**[9] Corporate Governance Guidelines (Webpage)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/corporate-governance-guidelines.pdf>

[p.11] IX. MANAGEMENT RESPONSIBILITIES.

(a) Financial Reporting and Legal Compliance.

While the Board has an oversight function, the Company's management has the primary responsibility for

- (i) preparing financial statements which accurately and fairly present the Company's financial results and condition and
- (ii) maintaining systems, procedures and corporate culture which comply with legal and regulatory requirements and foster the ethical conduct of the Company's business.

[p.12] (e) Code of Conduct.

The Company maintains a Code of Conduct which sets forth the Company's commitment to integrity and ethical behavior in all aspects of its business activity. The Code of Conduct is applicable to all of the Company's directors, officers and employees, all of whom are required to periodically verify their awareness of, and compliance with, the Code of Conduct. The Nominating and Governance Committee has oversight responsibility for the Code of Conduct.

**[11] Ethics - Our Program – Video (Webpage)**

Accessed 04/10/2019

<https://www.l3t.com/video/l3-ethics-our-program>

Our program is a living, breathing initiative, which is actively overseen by L3's board of directors and enjoys strong support from leadership and other colleagues throughout our company.

**[6] Proxy Statement 2019 (Document)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/L3Harris-2019-Proxy-Statement.pdf>

[p.23] Our Board's major responsibilities include:

[p.24] Overseeing our ethics and compliance programs




[p.25] Our Nominating and Governance Committee assists our Board in fulfilling its oversight responsibility as to our compliance with the goals and objectives in our Code of Conduct by reviewing and taking action regarding compliance processes, standards and controls and reviewing results of relevant audits and investigations.

[...]

**Ethics, Compliance and Sustainability Oversight**

Our Board has responsibility for overseeing our ethics and compliance programs and our activities related to corporate citizenship and responsibility and sustainability. This oversight is carried out largely through our Board's Nominating and Governance Committee, which assists our Board in overseeing our ethics and business conduct program, our environmental, health and safety programs and our charitable, civic, educational and philanthropic activities, and also monitors and takes appropriate action regarding strategic issues and trends relating to corporate citizenship and responsibility that could affect our operations, financial performance or public image.



<b>Question</b>
<b>1.4. Is responsibility for implementing and managing the company’s anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company’s programme?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that a designated senior executive – the company’s VP and Corporate Ethics Officer, also referred to as the Director of Ethics and Compliance – has ultimate responsibility for implementing and managing the company’s anti-bribery and corruption programme. It is clear that this person is at executive level and has a direct reporting line to the board through interaction with the Nomination and Governance Committee, which provides oversight of the anti-bribery and corruption programme. There is evidence of reporting and feedback activities between this person and the board as part of the company’s reporting structure, through attendance at meetings of the Nomination and Corporate Governance Committee.</p>
<b>Evidence</b>
<p><b>[10] Nominating And Governance Committee Charter (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf">https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf</a>                  [p.2] III. DUTIES AND RESPONSIBILITIES.</p> <p>To carry out its purposes, the Committee shall have the following duties and responsibilities:</p> <p>[p.5] 2. With respect to ethics, business conduct, environmental, health and safety or other corporate responsibility matters:</p> <ul style="list-style-type: none"> <li>(i) oversee the Company’s ethics and business conduct program consistent with sound, ethical business practices and legal requirements applicable to the Company;</li> <li>(ii) review audits and investigation results concerning compliance with the ethics and business conduct program and the Company’s Code of Conduct, including reports from the General Counsel, Director of Ethics and Compliance and other employees, as appropriate, and recommend to the Board, as appropriate, such measures and actions as may be appropriate from the results of such audits or investigative results;</li> <li>(iii) consult with independent legal counsel, consultants, experts or other Advisers (as defined below) or in-house legal counsel, as the Committee deems appropriate, including the Company’s General Counsel, head of Internal Audit, Director of Ethics and Compliance or Director of Environmental, Health and Safety in matters relating to the Company’s ethics and business conduct program or environmental, health and safety programs;</li> <li>(iv) recommend to the Board, as appropriate, such measures and actions that the Committee believes may be appropriate and necessary to assure the continued conduct of the Company’s activities and business within the parameters of legal compliance and sound, ethical business practices;</li> </ul> <p><b>[12] 2016 Annual Report (Document)</b>                  Accessed 07/10/2019  <a href="https://www.l3t.com/sites/default/files/annual-reports/2016_l3_annual_report.pdf">https://www.l3t.com/sites/default/files/annual-reports/2016_l3_annual_report.pdf</a>                  [p.12] Leadership Team</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p><b>Sheila M. Sheridan</b> VP, Administration</p> </div> <div style="text-align: center;">  <p><b>Lawrence V. Wasnock</b> VP and Corporate Ethics Officer</p> </div> <div style="text-align: center;">  <p><b>Kevin Weiss</b> VP, Human Resources</p> </div> </div>

**[11] Ethics - Our Program – Video (Webpage)**

Accessed 04/10/2019

<https://www.l3t.com/video/l3-ethics-our-program>

## L3 Ethics: Our Program



[Video in which Vice President and Corporate Ethics Officer provides overview of Ethics Programme]

## 2. Internal Controls

<b>Question</b>
<b>2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?</b>
<b>Score</b>
2
<b>Comments</b>
<p>There is evidence that the company has a formal bribery and corruption risk assessment procedure in place that informs the design of its anti-bribery and corruption programme. The results of risk assessments are reviewed by the board-level Audit Committee on an annual basis or when significant findings are identified. The company states that the results of such reviews are used to develop tailored mitigation plans and to update specific parts of the company's anti-bribery and corruption programme.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/3harris-anti-corruption-program">https://www.harris.com//content/3harris-anti-corruption-program</a>                  Anti-Corruption Manual (LGL-35.01 &amp; Procedure 706)</p> <p>[...]</p> <ul style="list-style-type: none"> <li>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.</li> </ul>

<b>Question</b>
<b>2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company's entire anti-bribery and corruption programme is subject to a regular audit to ensure the programme is consistent with best practice and the business risks facing the company. This includes provisions for continuous improvement, supplemented by an internal audit. There is also evidence to indicate that internal audits are conducted on an annual basis and that high-level audit findings are presented to the Audit Committee and the Nomination and Governance Committee. There is evidence that the company has management structures in place to implement recommended changes from audits.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Anti-Corruption Manual (LGL-35.01 &amp; Procedure 706)</p> <p>[...]</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>[1] Anti-Corruption Introduction (Webpage)</b>                  Accessed 03/10/2019  <a href="https://www.l3t.com/anti-corruption-statement/anti-corruption-statement">https://www.l3t.com/anti-corruption-statement/anti-corruption-statement</a>                  L3 has a comprehensive compliance program with established policies, procedures, training, and internal controls to ensure that its business activities reflect the highest levels of ethical conduct. The policies and procedures are reviewed on an ongoing basis to identify areas in need of improvement, and they are updated as necessary and appropriate. Policies, procedures, training, and related internal controls are also tested on an ongoing basis by Internal Audit and the departments governing the policies. The following overviews describe the spirit of the policies that serve as the foundation for ethical business practices and anti-corruption compliance.</p> <p>[...]</p> <p>Corporate Policy 709                  This policy sets forth the ethical standards of conduct and practices that must be followed by L3 in conducting international business. L3 prohibits public and private sector bribery in accordance with the U.S. FCPA, the UK Bribery Act, and other laws enacted pursuant to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. The policy's related procedures outline the detailed steps and approvals required for training, hospitality, and appropriate record-keeping. L3 policy prohibits facilitation payments. Anyone that becomes aware of any suspected violation must report it promptly to corporate headquarters. A formal review process exists to ensure any identified control gap or weaknesses are addressed and controls are updated to strengthen the company framework for compliance.</p> <p><b>[10] Nominating and Governance Committee Charter (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf">https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf</a>                  [p.1] L3HARRIS TECHNOLOGIES, INC. NOMINATING AND GOVERNANCE COMMITTEE OF THE BOARD OF DIRECTORS CHARTER</p> <p>I. PURPOSES.</p>

[...]

8. review and take appropriate action concerning processes, standards and controls within the Company regarding compliance with the Company's Code of Conduct;

[p.2] III. DUTIES AND RESPONSIBILITIES.

To carry out its purposes, the Committee shall have the following duties and responsibilities:

[p.5] 2. With respect to ethics, business conduct, environmental, health and safety or other corporate responsibility matters:

- (i) oversee the Company's ethics and business conduct program consistent with sound, ethical business practices and legal requirements applicable to the Company;
- (ii) review audits and investigation results concerning compliance with the ethics and business conduct program and the Company's Code of Conduct, including reports from the General Counsel, Director of Ethics and Compliance and other employees, as appropriate, and recommend to the Board, as appropriate, such measures and actions as may be appropriate from the results of such audits or investigative results;
- (iii) consult with independent legal counsel, consultants, experts or other Advisers (as defined below) or in-house legal counsel, as the Committee deems appropriate, including the Company's General Counsel, head of Internal Audit, Director of Ethics and Compliance or Director of Environmental, Health and Safety in matters relating to the Company's ethics and business conduct program or environmental, health and safety programs;
- (iv) recommend to the Board, as appropriate, such measures and actions that the Committee believes may be appropriate and necessary to assure the continued conduct of the Company's activities and business within the parameters of legal compliance and sound, ethical business practices;

<b>Question</b>
<b>2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company publicly commits to investigating incidents, and there is evidence that it has procedures in place to deal with whistleblowing cases. The company establishes dedicated ethics and compliance review boards composed of senior management to consider any reports received. There is evidence that summary information on investigations is reviewed by the Nominating and Governance Committee of the board of directors periodically, which is understood to indicate at least once annually. The company also indicates that it provides whistleblowers and those who report concerns with updates on the outcome of investigations.</p> <p>However, the company receives a score of ‘1’ because in publicly available evidence it does not stipulate documentation and actions to be taken at each step or provide clear details covering the entire investigation process, from receipt to final outcome. There is also no publicly available evidence on how the company ensures the independence of its investigations, for example by stating that reports are handled by an independent team or that the team reports to an independent board member.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.l3harris.com//content/l3harris-anti-corruption-program">https://www.l3harris.com//content/l3harris-anti-corruption-program</a>                  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 &amp; 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.</p> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.8] OUR RESPONSIBILITIES</p> <p>We all have a responsibility to live the L3Harris’ values and we will:</p> <ul style="list-style-type: none"> <li>• Be accountable for our own conduct</li> <li>• Comply with the policies, laws, and regulations that apply to our jobs</li> <li>• Seek guidance, raise concerns, and report any observed or suspected misconduct</li> <li>• Cooperate with investigations</li> </ul> <p>[p.10] HANDLING CONCERNS AND INVESTIGATIONS</p> <p>All questions, concerns, and reports of possible misconduct are taken seriously. L3Harris will take appropriate action whenever violations of our Code, policy, or law have occurred. The content of all investigations will be treated confidentially and/or anonymously, to the extent possible. This means that all employees are expected to cooperate with internal investigations and interviews; always tell the truth and never provide false statements.</p> <p><b>[13] Ethics Point Reporting Website (Webpage)</b>                  Accessed 08/10/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/17948/index.html">https://secure.ethicspoint.com/domain/media/en/gui/17948/index.html</a>                  WELCOME TO THE L3HARRIS TECHNOLOGIES HELPLINE</p> <p>L3Harris has provided this website for you to ask questions or to report unethical behavior and policy violations securely and confidentially. We believe that a “speak-up” culture creates a healthy, respectful, and productive</p>

workplace, which protects colleagues, customers, suppliers, shareholders, and our community alike. Your willingness to come forward is important to us.

We will strive to maintain confidentiality while conducting a thorough and fair investigation. We may ask you to keep certain information confidential to protect the integrity of this investigation, such as to protect a witness from retaliation or the security of relevant evidence or documents. We will stay in touch and keep you informed. Please notify us immediately if you believe you have experienced retaliation resulting from submission of your concern(s). Retaliation is a serious violation of our Code and related laws, and will not be tolerated.

We take all reported concerns seriously. Please ensure your report is accurate and truthful. The intentional inclusion of false or misleading information in a report can result in disciplinary action, civil and/or criminal liability.

#### **[1] Anti-Corruption Introduction and Policy Overviews (Webpage)**

Accessed 03/10/2019

<https://www.l3t.com/anti-corruption-statement/anti-corruption-statement>

Corporate Policy 709

This policy sets forth the ethical standards of conduct and practices that must be followed by L3 in conducting international business. L3 prohibits public and private sector bribery in accordance with the U.S. FCPA, the UK Bribery Act, and other laws enacted pursuant to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. The policy's related procedures outline the detailed steps and approvals required for training, hospitality, and appropriate record-keeping. L3 policy prohibits facilitation payments. Anyone that becomes aware of any suspected violation must report it promptly to corporate headquarters.

#### **[10] Nominating and Governance Committee Charter (Document)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf>

[p.1] L3HARRIS TECHNOLOGIES, INC. NOMINATING AND GOVERNANCE COMMITTEE OF THE BOARD OF DIRECTORS CHARTER

[p.5] 2. With respect to ethics, business conduct, environmental, health and safety or other corporate responsibility matters:

- (i) oversee the Company's ethics and business conduct program consistent with sound, ethical business practices and legal requirements applicable to the Company;
- (ii) review audits and investigation results concerning compliance with the ethics and business conduct program and the Company's Code of Conduct, including reports from the General Counsel, Director of Ethics and Compliance and other employees, as appropriate, and recommend to the Board, as appropriate, such measures and actions as may be appropriate from the results of such audits or investigative results;

[p.6] The Committee shall meet periodically as set forth in the annual schedule of the regular Board and committee meetings and as necessary upon the request of the Committee chairperson or upon the initiation of a majority of the members of the Committee.

#### **[8] Complaint Procedures (Document)**

Accessed 04/10/2019

[https://www.l3harris.com/documents/BOD-19-236\\_Complaint\\_Procedures.pdf](https://www.l3harris.com/documents/BOD-19-236_Complaint_Procedures.pdf)

[p.1] PROCEDURES FOR REPORTING AND RESPONDING TO COMPLAINTS OR CONCERNS ABOUT ACCOUNTING AND AUDITING AND CERTAIN OTHER COVERED MATTERS

L3Harris Technologies, Inc. is committed to ongoing compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. In furtherance of this commitment, all current and former employees, contractors, subcontractors and agents, as well as other persons who have information on such matters regarding L3Harris Technologies, Inc. or its subsidiaries ("L3Harris" or "Company") are encouraged to report directly to L3Harris, in the manner described below, their complaints or concerns about any accounting, internal accounting controls or auditing matter, financial reporting or disclosure matter, or any other matter they reasonably believe constitutes or may constitute a violation of law, rule or regulation relating to securities or to fraud against shareholders, in order to allow L3Harris to investigate and in appropriate cases more quickly and effectively take potential corrective or other remedial action and prevent or avoid future issues.

[p.2] • Any person who reports a complaint or concern and does not believe such complaint or concern has been addressed appropriately is encouraged to report such complaint or concern to higher levels of authority within L3Harris, up to and including L3Harris' Vice President of Internal Audit and L3Harris' General Counsel.



<b>Question</b>
<b>2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company assures itself of the quality of its internal investigations, including those reported through whistleblowing channels. There is evidence that the company reviews all compliance and anti-corruption procedures at least every two years, as well as subject to testing by regular internal audits. The company also indicates that it has a procedure in place to handle complaints about the investigation process, stating that employees may contact the Vice President of Internal Audit or the General Counsel in such cases.</p> <p>Although the company does not explicitly state that staff conducting investigations are properly trained to perform this function, there is sufficient evidence that it the ethics review boards or the Nomination and Governance Committee may engage independent and in-house legal expertise in the investigative process.</p>
<b>Evidence</b>
<p><b>[1] Anti-Corruption Introduction and Policy Overviews (Webpage)</b>                  Accessed 03/10/2019  <a href="https://www.l3t.com/anti-corruption-statement/anti-corruption-statement">https://www.l3t.com/anti-corruption-statement/anti-corruption-statement</a>                  L3 has a comprehensive compliance program with established policies, procedures, training, and internal controls to ensure that its business activities reflect the highest levels of ethical conduct. The policies and procedures are reviewed on an ongoing basis to identify areas in need of improvement, and they are updated as necessary and appropriate. Policies, procedures, training, and related internal controls are also tested on an ongoing basis by Internal Audit and the departments governing the policies. The following overviews describe the spirit of the policies that serve as the foundation for ethical business practices and anti-corruption compliance.</p> <p>[...]</p> <p>Corporate Policy 709                  [...] Anyone that becomes aware of any suspected violation must report it promptly to corporate headquarters. A formal review process exists to ensure any identified control gap or weaknesses are addressed and controls are updated to strengthen the company framework for compliance.</p> <p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  The Nominating &amp; Governance Committee oversees L3Harris' compliance with the goals and objectives set forth in the L3Harris Code of Conduct. L3Harris policy management requires that all policies must be reviewed and modified at a minimum of every two years, if necessary, to help ensure they are current and accurate.</p> <p>[...]</p> <p>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 &amp; Compliance Review Boards, comprised of L3Harris management, to review matters reported via any L3Harris resource.</p> <p><b>[10] Nominating and Governance Committee Charter (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf">https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf</a>                  [p.1] L3HARRIS TECHNOLOGIES, INC. NOMINATING AND GOVERNANCE COMMITTEE OF THE BOARD OF DIRECTORS CHARTER</p> <p>[p.5] 2. With respect to ethics, business conduct, environmental, health and safety or other corporate responsibility matters:</p> <ul style="list-style-type: none"> <li>(i) oversee the Company's ethics and business conduct program consistent with sound, ethical business practices and legal requirements applicable to the Company;</li> </ul>

- (ii) review audits and investigation results concerning compliance with the ethics and business conduct program and the Company's Code of Conduct, including reports from the General Counsel, Director of Ethics and Compliance and other employees, as appropriate, and recommend to the Board, as appropriate, such measures and actions as may be appropriate from the results of such audits or investigative results;
- (iii) consult with independent legal counsel, consultants, experts or other Advisers (as defined below) or in-house legal counsel, as the Committee deems appropriate, including the Company's General Counsel, head of Internal Audit, Director of Ethics and Compliance or Director of Environmental, Health and Safety in matters relating to the Company's ethics and business conduct program or environmental, health and safety programs;

### **[8] Complaint Procedures (Document)**

Accessed 04/10/2019

[https://www.l3harris.com/documents/BOD-19-236\\_Complaint\\_Procedures.pdf](https://www.l3harris.com/documents/BOD-19-236_Complaint_Procedures.pdf)

[p.1] PROCEDURES FOR REPORTING AND RESPONDING TO COMPLAINTS OR CONCERNS ABOUT ACCOUNTING AND AUDITING AND CERTAIN OTHER COVERED MATTERS

L3Harris Technologies, Inc. is committed to ongoing compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. In furtherance of this commitment, all current and former employees, contractors, subcontractors and agents, as well as other persons who have information on such matters regarding L3Harris Technologies, Inc. or its subsidiaries ("L3Harris" or "Company") are encouraged to report directly to L3Harris, in the manner described below, their complaints or concerns about any accounting, internal accounting controls or auditing matter, financial reporting or disclosure matter, or any other matter they reasonably believe constitutes or may constitute a violation of law, rule or regulation relating to securities or to fraud against shareholders, in order to allow L3Harris to investigate and in appropriate cases more quickly and effectively take potential corrective or other remedial action and prevent or avoid future issues.

[p.2] • Any person who reports a complaint or concern and does not believe such complaint or concern has been addressed appropriately is encouraged to report such complaint or concern to higher levels of authority within L3Harris, up to and including L3Harris' Vice President of Internal Audit and L3Harris' General Counsel.

[...]

- L3Harris' Vice President of Internal Audit may be contacted at: Telephone Number: 212.805.5208  
E-mail: Mauro.Fantini@L3Harris.com Regular Mail: Mauro Fantini Vice President, Internal Audit and Compliance  
L3Harris Technologies, Inc. 600 Third Avenue 38th Floor New York, NY 10016

• Confidential and/or Anonymous Reporting – Complaints or concerns regarding Potential Covered Matters also may be reported to L3Harris' Senior Director, Ethics and Compliance on a confidential and/or anonymous basis using the L3Harris Helpline as follows:

- For reporting by telephone or online, contact the L3Harris Helpline at: In the United States: 877-532.6339

Outside the United States: Callers can access their country specific number via link below.

Website: [www.L3HarrisHelpline.com](http://www.L3HarrisHelpline.com)

[...]

## II. SCOPE OF PROCEDURES.

[...]

• Violations of laws, rules or regulations relating to securities (including the Foreign Corrupt Practices Act and the Sarbanes-Oxley Act) or to fraud against shareholders or mail, wire or bank fraud.

## III. TREATMENT OF REPORTED COMPLAINTS AND CONCERNS.

• The Audit Committee has designated the Vice President of Internal Audit and the Senior Director, Ethics and Compliance as authorized recipients to assist the Audit Committee in assessing and dispositioning reported complaints and concerns regarding Potential Covered Matters. All recipients of such complaints or concerns will

immediately forward a copy of any mail or e-mail, or a transcript of a voicemail or summary of a call or oral complaint relating to Potential Covered Matters to the Vice President of Internal Audit and the Senior Director, Ethics and Compliance.

[...]

- Complaint or Concern Determined Not To Relate to a Potential Covered Matter – If the complaint or concern is determined not to relate to a Potential Covered Matter, then such complaint or concern will be handled in the same manner as other complaints or concerns are handled under the L3Harris Code of Conduct.

- Complaint or Concern Determined To Relate to a Potential Covered Matter But Not a Direct Report Potential Covered Matter – If the complaint or concern is determined to relate to a Potential Covered Matter but not a Direct Report Potential Covered Matter, then such complaint or concern will be handled in the same manner as

[p.5] other complaints or concerns are handled under the L3Harris Code of Conduct, except that the Chairperson of the Audit Committee or the full Audit Committee also may be consulted regarding the manner in which such complaint or concern may be addressed. All such complaints or concerns will nonetheless be reported to the Audit Committee by the Vice President of Internal Audit not less than on a quarterly basis.

#### **[9] Corporate Governance Guidelines (Webpage)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/corporate-governance-guidelines.pdf>

[p.1] L3HARRIS TECHNOLOGIES, INC. PROCEDURES FOR REPORTING AND RESPONDING TO COMPLAINTS OR CONCERNS ABOUT ACCOUNTING AND AUDITING AND CERTAIN OTHER COVERED MATTERS

L3Harris Technologies, Inc. is committed to ongoing compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. In furtherance of this commitment, all current and former employees, contractors, subcontractors and agents, as well as other persons who have information on such matters regarding L3Harris Technologies, Inc. or its subsidiaries (“L3Harris” or “Company”) are encouraged to report directly to L3Harris, in the manner described below, their complaints or concerns about any accounting, internal accounting controls or auditing matter, financial reporting or disclosure matter, or any other matter they reasonably believe constitutes or may constitute a violation of law, rule or regulation relating to securities or to fraud against shareholders, in order to allow L3Harris to investigate and in appropriate cases more quickly and effectively take potential corrective or other remedial action and prevent or avoid future issues.

The Audit Committee of L3Harris Technologies, Inc.’s Board of Directors (“Audit Committee”) will oversee the treatment of complaints or concerns regarding these matters. Furthermore, L3Harris will not tolerate or condone harassment, retaliation or any type of discrimination or adverse action against anyone who, based upon reasonable belief, makes a complaint or raises concerns regarding these matters or provides assistance or information relating to such matters.

<b>Question</b>
<b>2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is evidence the company commits to reports material findings of bribery and corruption from investigations to the board. The company also indicates that it will report identified instances of criminality to law enforcement.</p> <p>However, the company receives a score of '1' because ownership for this process is unclear; there is no clear evidence that an appropriate senior individual is responsible for ensuring that the disclosure of criminal offences to relevant authorities is evaluated and acted upon if necessary.</p>
<b>Evidence</b>
<p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.10] GOVERNMENT INVESTIGATIONS AND INQUIRIES</p> <p>Given the highly regulated environment in which we operate and the nature of the work we do, there may be times when a government official contacts an L3Harris employee directly as part of an inquiry or investigation. In these cases, it is expected that, after confirming the identity and authority of the individual as a government official, employees are cooperative, honest, and notify the L3Harris Legal Department immediately following such contact. In addition, employees are not authorized to present themselves as L3Harris representatives to government authorities, or to release any information on behalf of L3 Harris, unless specifically authorized by the L3 Harris Legal Department.</p> <p>[p.13] IMPORTANT</p> <p>The Federal Acquisition Regulation ("FAR") requires disclosure of credible evidence of violations of law (e.g., fraud, conflicts of interest, bribery or gratuities, etc.) in connection with the award, performance or closeout of U.S. Government contracts and subcontracts.</p> <p><b>[10] Nominating And Governance Committee Charter (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf">https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf</a>                  [p.2] III. DUTIES AND RESPONSIBILITIES.</p> <p>To carry out its purposes, the Committee shall have the following duties and responsibilities:</p> <p>[p.5] 2. With respect to ethics, business conduct, environmental, health and safety or other corporate responsibility matters:</p> <ul style="list-style-type: none"> <li>(i) oversee the Company's ethics and business conduct program consistent with sound, ethical business practices and legal requirements applicable to the Company;</li> <li>(ii) review audits and investigation results concerning compliance with the ethics and business conduct program and the Company's Code of Conduct, including reports from the General Counsel, Director of Ethics and Compliance and other employees, as appropriate, and recommend to the Board, as appropriate, such measures and actions as may be appropriate from the results of such audits or investigative results;</li> <li>(iii) consult with independent legal counsel, consultants, experts or other Advisers (as defined below) or in-house legal counsel, as the Committee deems appropriate, including the Company's General Counsel, head of Internal Audit, Director of Ethics and Compliance or Director of Environmental, Health and Safety in matters relating to the Company's ethics and business conduct program or environmental, health and safety programs;</li> <li>(iv) recommend to the Board, as appropriate, such measures and actions that the Committee believes may be appropriate and necessary to assure the continued conduct of the Company's activities and business within the parameters of legal compliance and sound, ethical business practices;</li> </ul>

**[9] Corporate Governance Guidelines (Webpage)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/corporate-governance-guidelines.pdf>

[p.1] L3HARRIS TECHNOLOGIES, INC. PROCEDURES FOR REPORTING AND RESPONDING TO COMPLAINTS OR CONCERNS ABOUT ACCOUNTING AND AUDITING AND CERTAIN OTHER COVERED MATTERS

L3Harris Technologies, Inc. is committed to ongoing compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. In furtherance of this commitment, all current and former employees, contractors, subcontractors and agents, as well as other persons who have information on such matters regarding L3Harris Technologies, Inc. or its subsidiaries (“L3Harris” or “Company”) are encouraged to report directly to L3Harris, in the manner described below, their complaints or concerns about any accounting, internal accounting controls or auditing matter, financial reporting or disclosure matter, or any other matter they reasonably believe constitutes or may constitute a violation of law, rule or regulation relating to securities or to fraud against shareholders, in order to allow L3Harris to investigate and in appropriate cases more quickly and effectively take potential corrective or other remedial action and prevent or avoid future issues.

The Audit Committee of L3Harris Technologies, Inc.’s Board of Directors (“Audit Committee”) will oversee the treatment of complaints or concerns regarding these matters. Furthermore, L3Harris will not tolerate or condone harassment, retaliation or any type of discrimination or adverse action against anyone who, based upon reasonable belief, makes a complaint or raises concerns regarding these matters or provides assistance or information relating to such matters.

**[18] Supplier Code of Conduct (Document)**

Accessed 10/10/2019

<https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf>

[p.4] B. Consequences for Violating Code

In the event of a violation of any of the above expectations, we may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, we may be required to report those violations to proper authorities. We reserve the right to terminate our relationship with any supplier under the terms of the existing procurement/purchasing contract.

<b>Question</b>
<b>2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any data on ethical or bribery and corruption reports, investigations or associated disciplinary actions involving its employees.
<b>Evidence</b>
No evidence found.

### 3. Support to Employees

<b>Question</b>
<b>3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that all employees must complete anti-corruption focused training and that this training programme covers the company’s Code of Conduct, which includes the whistleblowing options available to employees. The company states that all employees complete training on joining the company and periodically thereafter.</p> <p>However, the company receives a score of ‘1’ because it is not clear from publicly available evidence that anti-corruption training for employees is provided across all of its operations and geographies, and in all relevant languages.</p>
<b>Evidence</b>
<p><b>[1] Anti-Corruption Introduction and Policy Overviews (Webpage)</b>                  Accessed 03/10/2019  <a href="https://www.l3t.com/anti-corruption-statement/anti-corruption-statement">https://www.l3t.com/anti-corruption-statement/anti-corruption-statement</a>                  Corporate Policy 709                  This policy sets forth the ethical standards of conduct and practices that must be followed by L3 in conducting international business. L3 prohibits public and private sector bribery in accordance with the U.S. FCPA, the UK Bribery Act, and other laws enacted pursuant to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. The policy’s related procedures outline the detailed steps and approvals required for training, hospitality, and appropriate record-keeping.</p> <p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Anti-Corruption Policies                  Global Anti-Corruption Policy (LGL-35)</p> <p>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.</p> <p><b>[11] Ethics - Our Program – Video (Webpage)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/video/l3-ethics-our-program">https://www.l3t.com/video/l3-ethics-our-program</a>                  Our ethics programme is a behavioural guide with a strong educational component that starts with our Code of Ethics and Business Conduct.</p> <p>Our code is central and serves as the framework in addition to other awareness and educational elements.</p> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.8] OUR RESPONSIBILITIES</p> <p>We all have a responsibility to live the L3Harris’ values and we will:</p>

- Be accountable for our own conduct
- Comply with the policies, laws, and regulations that apply to our jobs
- Seek guidance, raise concerns, and report any observed or suspected misconduct
- Cooperate with investigations
- Complete all required training on-time, including certification to our Code



<b>Question</b>
<p><b>3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:</b></p> <ul style="list-style-type: none"> <li>a) Employees in high risk positions,</li> <li>b) Middle management,</li> <li>c) Board members.</li> </ul>
<b>Score</b>
1
<b>Comments</b>
<p>There is some evidence the company provides targeted anti-corruption training to certain employees based on an their specific role and exposure to corruption risk.</p> <p>However, the company receives a score of ‘1’ because it does not provide further publicly available information to indicate that this includes all three categories of employee as identified in (a), (b) and (c) in the question. In addition, thile the company states that this training is provided periodically, there is no evidence that employees in high risk positions specifically must refresh their anti-corruption training on at least an annual basis.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Anti-Corruption Policies                  Global Anti-Corruption Policy (LGL-35)</p> <p>[...]</p> <p>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.</p>

<b>Question</b>
<b>3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is evidence that the company's anti-corruption communications and training programme is subject to regular review and that, along with all elements of the anti-corruption programme, it is updated when gaps or possible improvements are identified. The company indicates that it monitors these processes on an ongoing basis, with a full review at least every two years.</p> <p>The company receives a score of '1' because it does not provide further publicly available evidence of how it measures the effectiveness of its anti-corruption communications and personnel training programme, for example by conducting staff surveys or other awareness activities.</p>
<b>Evidence</b>
<p><b>[1] Anti-Corruption Introduction (Webpage)</b>                  Accessed 03/10/2019  <a href="https://www.l3t.com/anti-corruption-statement/anti-corruption-statement">https://www.l3t.com/anti-corruption-statement/anti-corruption-statement</a>                  L3 has a comprehensive compliance program with established policies, procedures, training, and internal controls to ensure that its business activities reflect the highest levels of ethical conduct. The policies and procedures are reviewed on an ongoing basis to identify areas in need of improvement, and they are updated as necessary and appropriate. Policies, procedures, training, and related internal controls are also tested on an ongoing basis by Internal Audit and the departments governing the policies. The following overviews describe the spirit of the policies that serve as the foundation for ethical business practices and anti-corruption compliance.</p> <p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com/content/l3harris-anti-corruption-program">https://www.harris.com/content/l3harris-anti-corruption-program</a>                  The Nominating &amp; Governance Committee oversees L3Harris' compliance with the goals and objectives set forth in the L3Harris Code of Conduct. L3Harris policy management requires that all policies must be reviewed and modified at a minimum of every two years, if necessary, to help ensure they are current and accurate.</p> <p>[...]</p> <p>Global Anti-Corruption Policy (LGL-35)</p> <ul style="list-style-type: none"> <li>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.</li> <li>Corporate Policy LGL-02 Policy Maintenance requires L3Harris to review and update, as necessary, all policies every two years.</li> </ul>

<b>Question</b>
<b>3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no publicly available evidence that the company's incentive schemes for employees incorporate ethical or anti-bribery and corruption principles.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is evidence that the company commits to support and protect employees to speak up and “do the right thing”, and never compromise its values in order to achieve business objectives. This commitment appears in the form of a clear statement from the Chairman and CEO, and its commitment to ethical business conduct is reiterated throughout its anti-corruption materials.</p> <p>However, the company receives a score of ‘1’ because there is no publicly available evidence that it assures itself of its employees’ confidence in this commitment through anonymised surveys or other clearly stated means.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  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.</p> <p><b>[13] Ethics Point Reporting Website (Webpage)</b>                  Accessed 08/10/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/17948/index.html">https://secure.ethicspoint.com/domain/media/en/gui/17948/index.html</a>                  WELCOME TO THE L3HARRIS TECHNOLOGIES HELPLINE                  L3Harris has provided this website for you to ask questions or to report unethical behavior and policy violations securely and confidentially. We believe that a “speak-up” culture creates a healthy, respectful, and productive workplace, which protects colleagues, customers, suppliers, shareholders, and our community alike. Your willingness to come forward is important to us.</p> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.3] MESSAGE FROM OUR CHAIRMAN &amp; CEO</p> <p>Our values serve as the foundation for our success. Acting with INTEGRITY in all our business dealings, exhibiting EXCELLENCE by delivering on our commitments, and demonstrating RESPECT to those we interact with—these are all essential to maintaining a lasting and solid reputation.</p> <p>This Code of Conduct highlights critical policies and regulations that impact our business operations—that we are all expected to adhere to every day. Adhering to our Code, our policies, and the law is non-negotiable—and it's a condition of employment. If you are ever in doubt about the right course of action—or observe an action inconsistent with our values—you are empowered to raise the issue with your supervisor or the many other L3Harris Resources available to you. You can do this with complete confidence because L3Harris does not tolerate retaliation against anyone for asking questions or raising concerns.</p> <p>We must maintain an unwavering commitment to high ethical standards, and never compromise our values in order to achieve business objectives. Our customers, shareholders, suppliers, and communities expect nothing less. Thank you for your commitment to living our values every day.</p> <p>Sincerely,</p> <p>BILL BROWN</p> <p>Chairman &amp; Chief Executive Officer</p> <p>[p.8] MANAGEMENT RESPONSIBILITIES</p>

L3Harris supervisors, managers, and leaders must also:

- Set the tone by promoting our values and Code and responding to employee concerns
- Model ethical behavior by demonstrating integrity, being inclusive, treating others with respect, and ensuring employees are not pressured to compromise L3Harris' policies or the law
- Foster an ethical culture where employees are encouraged to speak up, ask questions, and report behavior inconsistent with our values and Code, without fear of retaliation

[p.11] COMMITMENT TO OUR CUSTOMERS AND BUSINESS PARTNERS

As a trusted partner to our customers and business partners around the world, L3Harris is committed to delivering quality products and services. We hold ourselves accountable for being aware of and following the rules that apply to the work we do. In our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including our agents and business partners

**[5] Our Culture (Webpage)**

Accessed 04/10/2019

<https://www.l3harris.com/who-we-are/our-culture>

L3Harris has an unwavering commitment to living our values and Code of Conduct. Our leaders model an ethical culture. Employees raise concerns without fear of retaliation. We're all accountable for our work, and to each other.

<b>Question</b>
<b>3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence the company promotes a policy of non-retaliation against both whistleblowers and employees who report bribery and corruption incidents, as outlined in the company’s Code of Conduct. There is evidence that this commitment extends to all third parties, which are also able to access the company’s whistleblowing line. There is evidence that company assures itself of employees’ confidence in this commitment by monitoring usage statistics from its reporting line. It is noted that the company does not publish high-level usage data on its reporting line.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  L3Harris is confident that employees report concerns and that L3Harris is taking action based upon the L3Harris reporting average.</p> <p><b>[5] Our Culture (Webpage)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/who-we-are/our-culture">https://www.l3harris.com/who-we-are/our-culture</a>                  L3Harris has an unwavering commitment to living our values and Code of Conduct. Our leaders model an ethical culture. Employees raise concerns without fear of retaliation. We’re all accountable for our work, and to each other.</p> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.6] Our Code applies to L3Harris employees, officers and members of the Board of Directors. Following the Code is mandatory. We all have an obligation to comply with our Code, our policies and the laws where we do business.</p> <p>Violations are taken seriously at L3Harris and may result in disciplinary action, up to and including termination of employment. As the Code cannot address all of the applicable laws and regulations, please seek guidance from the appropriate L3Harris Resource whenever questions arise.</p> <p>We also expect all third parties with whom we contract, including agents, suppliers and contractors, to comply with the L3Harris Supplier Code of Conduct when conducting business on L3Harris’ behalf.</p> <p>[p.8] MANAGEMENT RESPONSIBILITIES</p> <p>L3Harris supervisors, managers, and leaders must also:</p> <ul style="list-style-type: none"> <li>• Set the tone by promoting our values and Code and responding to employee concerns</li> <li>• Model ethical behavior by demonstrating integrity, being inclusive, treating others with respect, and ensuring employees are not pressured to compromise L3Harris’ policies or the law</li> <li>• Foster an ethical culture where employees are encouraged to speak up, ask questions, and report behavior inconsistent with our values and Code, without fear of retaliation</li> </ul> <p>[p.10] OUR CULTURE OF NON-RETALIATION</p> <p>L3Harris strictly prohibits any form of retaliation against an employee, who in good faith reports a violation of the Code or of the law or assists in the investigation of a reported concern. Employees, who engage in retaliatory behavior against others, may be subjected to disciplinary action, up to and including termination.</p> <p><b>[13] Ethics Point Reporting Website (Webpage)</b>                  Accessed 08/10/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/17948/index.html">https://secure.ethicspoint.com/domain/media/en/gui/17948/index.html</a>                  [...] Please notify us immediately if you believe you have experienced retaliation resulting from submission of your concern(s). Retaliation is a serious violation of our Code and related laws, and will not be tolerated.</p>

**[9] Corporate Governance Guidelines (Webpage)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/corporate-governance-guidelines.pdf>

[p.1] L3HARRIS TECHNOLOGIES, INC. PROCEDURES FOR REPORTING AND RESPONDING TO COMPLAINTS OR CONCERNS ABOUT ACCOUNTING AND AUDITING AND CERTAIN OTHER COVERED MATTERS

L3Harris Technologies, Inc. is committed to ongoing compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. In furtherance of this commitment, all current and former employees, contractors, subcontractors and agents, as well as other persons who have information on such matters regarding L3Harris Technologies, Inc. or its subsidiaries ("L3Harris" or "Company") are encouraged to report directly to L3Harris, in the manner described below, their complaints or concerns about any accounting, internal accounting controls or auditing matter, financial reporting or disclosure matter, or any other matter they reasonably believe constitutes or may constitute a violation of law, rule or regulation relating to securities or to fraud against shareholders, in order to allow L3Harris to investigate and in appropriate cases more quickly and effectively take potential corrective or other remedial action and prevent or avoid future issues.

The Audit Committee of L3Harris Technologies, Inc.'s Board of Directors ("Audit Committee") will oversee the treatment of complaints or concerns regarding these matters. Furthermore, L3Harris will not tolerate or condone harassment, retaliation or any type of discrimination or adverse action against anyone who, based upon reasonable belief, makes a complaint or raises concerns regarding these matters or provides assistance or information relating to such matters.

**[8] Complaint Procedures (Document)**

Accessed 04/10/2019

[https://www.l3harris.com/documents/BOD-19-236\\_Complaint\\_Procedures.pdf](https://www.l3harris.com/documents/BOD-19-236_Complaint_Procedures.pdf)

[p.6] V. NON-RETALIATION.

L3Harris will not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against any employee in the terms and conditions of employment or any other person based upon any lawful actions of such employee or other person with respect to the reporting of, or assistance with, complaints regarding Potential Covered Matters or otherwise as specified in Section 806 of the Sarbanes-Oxley Act of 2002, Section 922 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 or Section 21F(h)(1) of the Securities Exchange Act of 1934, as amended. L3Harris will promptly review and investigate any report of retaliatory or other similar behavior. Furthermore, L3Harris will take appropriate disciplinary actions against any person who retaliates against any other person who, based upon reasonable belief, makes a complaint or raises concerns regarding Potential Covered Matters or who provides assistance or information relating to such matters.

<b>Question</b>
<b>3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company provides both whistleblowing and advice channels for its employees to report concerns and seek advice on its anti-bribery and corruption programme. The company states that reports and questions may be submitted confidentially and anonymously. There is evidence that its channels are sufficiently varied to allow employees to raise concerns across the management chain and to an external body through an independently-operated ethics hotline.</p> <p>In addition, the company indicates that its channels are available to all employees and external parties, such as suppliers, joint venture partners and other third parties, as well as in multiple languages and in all relevant geographies across its operations.</p>
<b>Evidence</b>
<p><b>[13] Ethics Point Reporting Website (Webpage)</b>                  Accessed 08/10/2019  <a href="https://secure.ethicspoint.com/domain/media/en/gui/17948/index.html">https://secure.ethicspoint.com/domain/media/en/gui/17948/index.html</a>                  Deutsch English Español Français (Canada) Italiano 한국어 Português (European Union) ไทย汉语 [S]                  Attention: This webpage is hosted on EthicsPoint's secure servers and is not part of the L3Harris Technologies, Inc. website or intranet.</p> <p>WELCOME TO THE L3HARRIS TECHNOLOGIES HELPLINE</p> <p>L3Harris has provided this website for you to ask questions or to report unethical behavior and policy violations securely and confidentially. We believe that a “speak-up” culture creates a healthy, respectful, and productive workplace, which protects colleagues, customers, suppliers, shareholders, and our community alike. Your willingness to come forward is important to us.</p> <p>We will strive to maintain confidentiality while conducting a thorough and fair investigation. We may ask you to keep certain information confidential to protect the integrity of this investigation, such as to protect a witness from retaliation or the security of relevant evidence or documents. We will stay in touch and keep you informed. Please notify us immediately if you believe you have experienced retaliation resulting from submission of your concern(s).</p> <p>Retaliation is a serious violation of our Code and related laws, and will not be tolerated.</p> <p>We take all reported concerns seriously. Please ensure your report is accurate and truthful. The intentional inclusion of false or misleading information in a report can result in disciplinary action, civil and/or criminal liability.</p> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="background-color: red; color: white; padding: 5px 10px; border-radius: 5px;">ASK A QUESTION</div> <div style="background-color: red; color: white; padding: 5px 10px; border-radius: 5px;">MAKE A REPORT</div> <div style="background-color: red; color: white; padding: 5px 10px; border-radius: 5px;">FOLLOW UP</div> </div> <p><b>[2] Ethics (Webpage)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/code-of-ethics">https://www.l3t.com/code-of-ethics</a>                  Seeking Advice and Raising Concerns</p> <p>We may report our concerns in several ways:</p> <ul style="list-style-type: none"> <li>• Supervisor or other member of management</li> <li>• Human Resources</li> <li>• Member of the Legal Department</li> <li>• Subject Matter Expert (Contracts, Quality, Finance, Security, Government Compliance, Information Security, Trade Compliance, EHS, Communications, etc.)</li> </ul>



- An Ethics Advisor or Ethics & Compliance staff member
- L3Harris Helpline:  
Website: [www.L3HarrisHelpline.com](http://www.L3HarrisHelpline.com)  
Phone: 1-877-532-6339
- Mail:  
L3Harris Technologies, Inc  
Attention: Corporate Ethics Office  
1025 West NASA Blvd.  
Melbourne, Florida 32919

**[11] Ethics - Our Program – Video (Webpage)**

Accessed 04/10/2019

<https://www.l3t.com/video/l3-ethics-our-program>

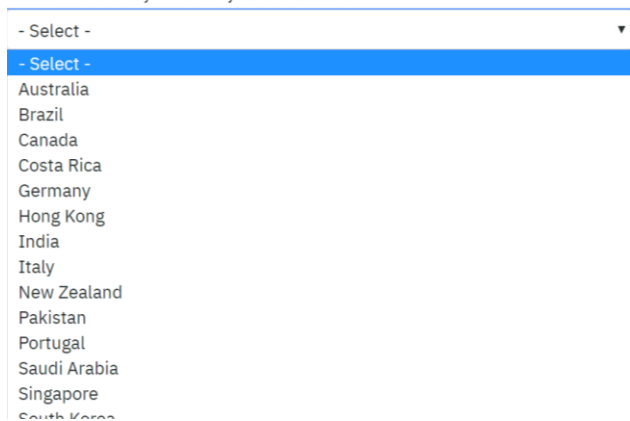
We take pride in our speak up culture, we are encouraged to be engaged and ask questions, and if a question becomes a concern we are committed to investigating allegations of misconduct in a thorough and timely manner.

**[14] Ethics Point – Make A Report (Webpage)**

Accessed 08/10/2019

<https://secure.ethicspoint.com/domain/media/en/gui/17948/report.html>

Select the country in which you are located.



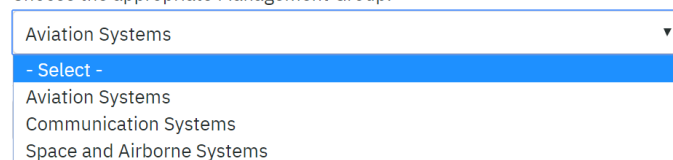
Select the country in which you are located.



Select the country in which the violation took place.



Choose the appropriate Management Group:



**[18] Supplier Code of Conduct (Document)**

Accessed 10/10/2019

<https://www.l3t.com/sites/default/files/supplier-forms/l3harrisuppliercodeofconduct.pdf>

[p.2] For the purposes of this Code, “Supplier” is defined as any third party that directly or indirectly sells, or seeks to sell, any kind of goods or services to our company or on our company’s behalf, including suppliers, contractors, subcontractors, distributors, dealers, sales/marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators, or similar entities.

[p.4] Contact the L3Harris Helpline to report observed misconduct, confidentially and/or anonymously:

Web: [www.L3HarrisHelpline.com](http://www.L3HarrisHelpline.com)

Phone: 877.532.6339

**[6] Proxy Statement 2019 (Document)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/L3Harris-2019-Proxy-Statement.pdf>

[p.25] Employees are required to report any conduct they believe in good faith to be a violation of our Code of Conduct or policies.

**[3] Code of Conduct (Document)**

Accessed 04/10/2019

<https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf>

[p.6] Our Code applies to L3Harris employees, officers and members of the Board of Directors. Following the Code is mandatory. We all have an obligation to comply with our Code, our policies and the laws where we do business.

Violations are taken seriously at L3Harris and may result in disciplinary action, up to and including termination of employment. As the Code cannot address all of the applicable laws and regulations, please seek guidance from the appropriate L3Harris Resource whenever questions arise.

We also expect all third parties with whom we contract, including agents, suppliers and contractors, to comply with the L3Harris Supplier Code of Conduct when conducting business on L3Harris' behalf.

[p.7] Making Ethical Decisions

Our Code cannot anticipate every scenario in which we might encounter an ethical dilemma or question. We should always use our best judgment. When faced with an ethical dilemma, follow L3Harris' Ethical Decision-Making Model – ACT – a simple three-step process to guide us in applying our values when making decisions.

- Website: [www.L3HarrisHelpline.com](http://www.L3HarrisHelpline.com)
- Phone: 1-877-532-6339 Mail: L3Harris Technologies, Inc. Attention: Corporate Ethics Office 1025 West NASA Blvd. Melbourne, Florida 32919

<div style="font-size: 2em; font-weight: bold; margin-bottom: 5px;">A</div> <p style="font-size: 0.8em; margin: 0;"><b>ASK WHAT THE ISSUES ARE.</b></p> <p style="font-size: 0.7em; margin: 0;">Many serious ethics issues can be avoided by taking a moment to think about the situation before taking action.</p>
<div style="font-size: 2em; font-weight: bold; margin-bottom: 5px;">C</div> <p style="font-size: 0.8em; margin: 0;"><b>CONSIDER OUR VALUES AND YOUR RESPONSIBILITIES.</b></p> <p style="font-size: 0.7em; margin: 0;">Good decisions are based on our values and applicable policies and laws, as well as common sense.</p>
<div style="font-size: 2em; font-weight: bold; margin-bottom: 5px;">T</div> <p style="font-size: 0.8em; margin: 0;"><b>TAKE ACTION.</b></p> <p style="font-size: 0.7em; margin: 0;">In a timely manner, ask for help, obtain more information, or report the matter to an L3Harris Resource.</p>



[p.8] OUR RESPONSIBILITIES

We all have a responsibility to live the L3Harris' values and we will:

- Be accountable for our own conduct
- Comply with the policies, laws, and regulations that apply to our jobs
- Seek guidance, raise concerns, and report any observed or suspected misconduct

[p.9] L3HARRIS RESOURCES

We have a responsibility to seek guidance or report concerns when we are unsure about a situation or behavior. The following L3Harris Resources are always available: Supervisor or other member of management Human Resources Member of the Legal Department Subject Matter Expert (Contracts, Quality, Finance, Security, Government Compliance, Information Security, Trade Compliance, EHS, Communications, etc.) An Ethics Advisor or Ethics & Compliance staff member L3Harris Helpline

For concerns about accounting, internal controls, auditing, financial controls or disclosure of possible violations of securities laws, you may also contact the Audit Committee of the Board of Directors by mail at the following: L3Harris Technologies, Inc. Corporate Headquarters Attention: Audit Committee 1025 West NASA Blvd. Melbourne, Florida 32919

[p.10] HANDLING CONCERNS AND INVESTIGATIONS All questions, concerns, and reports of possible misconduct are taken seriously. L3Harris will take appropriate action whenever violations of our Code, policy, or law have occurred. The content of all investigations will be treated confidentially and/or anonymously, to the extent possible. This means that all employees are expected to cooperate with internal investigations and interviews; always tell the truth and never provide false statements.

ADDITIONAL INFORMATION:

When reporting anonymously through the Helpline, periodically check for communications and possible follow-up questions regarding your concern. Your participation is important to support a thorough and fair investigation.

[p.13] IMPORTANT

The Federal Acquisition Regulation (“FAR”) requires disclosure of credible evidence of violations of law (e.g., fraud, conflicts of interest, bribery or gratuities, etc.) in connection with the award, performance or closeout of U.S. Government contracts and subcontracts. It is critically important that we immediately report any possible violations of the law or an overpayment on a government contract or subcontract to an L3Harris Resource.

[p.14] IMPORTANT

If we receive any information that might be construed as presenting a conflict with the laws, regulations and rules that apply to activities related to contracting with the U.S. Government, or if we have any questions about these laws and regulations, we should contact an L3Harris Resource

[p.36] L3HARRIS RESOURCES

We may report our concerns in several ways:

Supervisor or other member of management Human Resources Member of the Legal Department Subject Matter Expert (Contracts, Quality, Finance, Security, Government Compliance, Information Security, Trade Compliance, EHS, Communications, etc.) An Ethics Advisor or Ethics & Compliance staff member L3Harris Helpline

- Website: [www.L3HarrisHelpline.com](http://www.L3HarrisHelpline.com)
- Phone: 1-877-532-6339
- Mail: L3Harris Technologies, Inc. Attention: Corporate Ethics Office 1025 West NASA Blvd. Melbourne, Florida 32919

## 4. Conflict of Interest

<b>Question</b>
<b>4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence the company formally addresses conflicts of interest as a corruption risk, and that it has a clear policy to define conflicts of interest, including actual, potential and perceived conflicts. The company’s policy covers possible conflicts arising from government relationships, employee relationships, financial interests, and outside employment. There is evidence that this policy applies to all employees, directors and any third parties with which the company does business.</p>
<b>Evidence</b>
<p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.6] OUR CODE OF CONDUCT</p> <p>Our Code of Conduct (“Code”) describes our commitment to our values, summarizes the essential policies, laws, and regulations that we need to know while working for L3Harris, and is our guide to ethical decision-making. Making ethical decisions is essential to how we work with each other, with our customers and business partners, and within our global community. Our Code applies to L3Harris employees, officers and members of the Board of Directors. Following the Code is mandatory. We all have an obligation to comply with our Code, our policies and the laws where we do business. Violations are taken seriously at L3Harris and may result in disciplinary action, up to and including termination of employment.</p> <p>As the Code cannot address all of the applicable laws and regulations, please seek guidance from the appropriate L3Harris Resource whenever questions arise. We also expect all third parties with whom we contract, including agents, suppliers and contractors, to comply with the L3Harris Supplier Code of Conduct when conducting business on L3Harris’ behalf.</p> <p>[p.13] Working with governments means that we:</p> <ul style="list-style-type: none"> <li>• Maintain the highest levels of procurement integrity</li> <li>• Provide accurate submissions of time charging and other costs</li> <li>• Understand and avoid organizational conflicts of interest</li> <li>• Do not hire former government employees without authorization</li> </ul> <p>[p.15] ORGANIZATIONAL CONFLICTS OF INTEREST                  Organizational conflicts of interest (“OCI”) may occur in connection with government contracts when activities being performed by the contractor can either result in an unfair competitive advantage for the contractor or the work may impair the contractor’s ability to be objective. For example, if we drafted specifications for a government contract, we might be precluded from bidding on that contract.</p> <p>[p.21] AVOIDING CONFLICTS OF INTEREST                  We are trusted to always act in the best interest of L3Harris, devote our full professional effort to our jobs, and avoid conflicts of interest. A “conflict of interest” can arise when a personal interest conflicts, or appears to conflict, with the best interests of the Company. Any activity, situation, or relationship that conflicts or appears to conflict with the interests of L3Harris must be promptly and fully disclosed. While we cannot list every potential conflict of interest, some common examples are:</p> <ul style="list-style-type: none"> <li>• Hiring or managing a family member or someone with whom we have a personal relationship, including romantic/dating</li> </ul>

- Having a business relationship with a supplier, contractor, or customer where there is a family, financial, or personal relationship
- Being employed by or having a business connection with a competitor, supplier, or customer
- Using L3Harris equipment or resources for non-business purposes
- Taking personal advantage of business opportunities discovered through the use of Company property, information or our position
- Obtaining outside employment that gives access to third-party intellectual property that is the same or similar as that which L3Harris owns, is developing or has access to

#### IMPORTANT

Even if we believe we are acting properly, a personal relationship with another employee may be perceived by others as a conflict and must be disclosed to an L3Harris Resource.

#### [22] Anti-Corruption Programme (Webpage)

Accessed 12/02/2020

<https://www.harris.com//content/l3harris-anti-corruption-program>

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.

#### [9] Corporate Governance Guidelines (Webpage)

Accessed 04/10/2019

<https://www.l3harris.com/documents/corporate-governance-guidelines.pdf>

[p.5] (iv) Other Directorships.

The Board values the experience directors bring from other boards on which they serve but recognizes that individuals should limit the number of boards on which they serve so they can give proper attention to their responsibility to each board.

[p.6] To avoid any potential conflict of interest, each director also is expected to refrain from serving as a director of any company that competes with the Company.

[p.10] (b) Code of Conduct and Ethics.

Each member of the Board shall at all times exhibit high standards of integrity and ethical behavior. Each director shall adhere to the applicable Company policies concerning integrity and ethical behavior, including the Company's Code of Conduct. In addition, directors must avoid any conflict between their own interests and the interests of the Company in dealing with suppliers, customers and other third parties, and in the conduct of their personal affairs.

#### [18] Supplier Code of Conduct (Document)

Accessed 10/10/2019

<https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf>

[p.2] DEFINITION

For the purposes of this Code, "Supplier" is defined as any third party that directly or indirectly sells, or seeks to sell, any kind of goods or services to our company or on our company's behalf, including suppliers, contractors, subcontractors, distributors, dealers, sales/marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators, or similar entities.

[p.3] V. CONFLICT OF INTEREST

We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with our company. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of our company and personal interests or those of close relatives, friends or associates.

<b>Question</b>
<b>4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence the company has procedures to identify, declare and manage conflicts of interest, including actual, potential and perceived conflicts. The company indicates that its Human Resources and Ethics and Compliance departments are responsible for reviewing conflicts of interest declarations and for the subsequent management of individual cases. In addition, the company states that disciplinary measures apply for violations of the company's Code of Conduct, which outlines the company's policy on conflicts of interest.</p> <p>However, the company receives a score of '1' because there is no clear evidence that it has a dedicated central register for all employee and board member declarations, which is accessible to the teams tasked with managing conflict of interest cases. The company also does not provide examples of possible criteria for recusals.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Conflicts of Interest (L3Harris Policy HR-03 Employment and Legacy Harris Policy 00-LGL-02 Conflict of Interest)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Potential or actual conflict of interest declarations are reviewed and overseen by human resources and ethics &amp; compliance with ultimate accountability for its implementation and handling of individual cases.</li> </ul> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.6] Violations are taken seriously at L3Harris and may result in disciplinary action, up to and including termination of employment.</p> <p>[p.21] IMPORTANT                  Even if we believe we are acting properly, a personal relationship with another employee may be perceived by others as a conflict and must be disclosed to an L3Harris Resource.</p> <p><b>[6] Proxy Statement 2019 (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/L3Harris-2019-Proxy-Statement.pdf">https://www.l3harris.com/documents/L3Harris-2019-Proxy-Statement.pdf</a>                  [p.25] Our Nominating and Governance Committee assists our Board in fulfilling its oversight responsibility as to our compliance with the goals and objectives in our Code of Conduct by reviewing and taking action regarding compliance processes, standards and controls and reviewing results of relevant audits and investigations. Our Code of Conduct covers a broad range of topics, including:</p> <ul style="list-style-type: none"> <li>&gt; Respect in the workplace</li> <li>&gt; Health and safety</li> <li>&gt; Privacy of personally identifiable information</li> <li>&gt; Avoiding conflicts of interest</li> </ul> <p>[p.46] The Harris Compensation Committee also periodically met with PM in executive session, without Harris' CEO or other members of management present. The Harris Compensation Committee also assessed PM's independence and whether its work raised any conflicts of interest (taking into consideration the independence factors in the NYSE listing standards and SEC rules) and determined in its business judgment that PM was independent and that its work did not raise any conflicts of interest.</p>

**[10] Nominating And Governance Committee Charter (Document)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf>

[p.7] In selecting and retaining, or receiving advice from, an Adviser to determine or recommend the amount or form of director compensation (other than in-house legal counsel or any Adviser whose role is limited to the activities for which no disclosure would be required under Item 407(e)(3)(iii) of Regulation S-K), the Committee must first take into consideration all factors relevant to that person's independence from management, including the following factors:

[...]

- the policies and procedures of the person that employs the Adviser that are designed to prevent conflicts of interest;

**[9] Corporate Governance Guidelines (Webpage)**

Accessed 04/10/2019

<https://www.l3harris.com/documents/corporate-governance-guidelines.pdf>

[p.4] (g) Board Membership Criteria. The Board's policy is to encourage the selection of directors and director nominees who will contribute to the Company's overall corporate goals, including: responsibility to its shareholders, industry leadership, customer success, positive working environment, and integrity in financial reporting and business conduct. The Board, based on the recommendation of the Nominating and Governance Committee, will select nominees for the position of director considering the following criteria:

[...]

- (v) giving due consideration to potential conflicts of interest, current knowledge and contacts in the markets in which the Company does business and in the Company's industry or other industries relevant to the Company's businesses;

[p.5] (h) Term Limits; Retirement; Change in Status; Other Directorships; Communications.

[...]

The Board, in consultation with the Nominating and Governance Committee, will determine, on a case-by-case basis, whether the director's continued Board membership under the new circumstances is in the best interests of the Company, free from conflicts of interest and otherwise appropriate.

[p.6] Each director also is expected to notify the Chairman of the Board, Lead Independent Director (if one is designated), the chairperson of the Nominating and Governance Committee and the Secretary of the Company in advance of his or her decision to accept any additional private company directorship and any additional not-for-profit/charitable board or similar position. To avoid any potential conflict of interest, each director also is expected to refrain from serving as a director of any company that competes with the Company.

**[18] Supplier Code of Conduct (Document)**

Accessed 10/10/2019

<https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf>

[p.3] V. CONFLICT OF INTEREST

We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with our company. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of our company and personal interests or those of close relatives, friends or associates.

<b>Question</b>
<b>4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company has a policy that addresses the risks associated with the employment of public officials. The company states that it requires a legal review prior to hiring former public officials, and indicates that employees must consult with management before initiating employment discussions with current or former government employees. There is some evidence to suggest that such pre-employment reviews include an assessment of actual or potential conflicts of interest.</p> <p>However, the company receives a score of ‘1’ because there is no publicly available evidence that it may impose restrictions on the activities of former public officials once appointed, based on the results of a conflict of interest review. There is also no clear evidence that the company requires a cooling-off period of at least 12 months before public officials are permitted to have any form of contact or relationship with their former organisation on the company’s behalf.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Conflicts of Interest (L3Harris Policy HR-03 Employment and Legacy Harris Policy 00-LGL-02 Conflict of Interest)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Potential or actual conflict of interest declarations are reviewed and overseen by human resources and ethics &amp; compliance with ultimate accountability for its implementation and handling of individual cases.</li> <li>• Sets forth L3Harris’ hiring practices, including L3Harris legal review to ensure compliance prior to hiring former government officials.</li> </ul> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.13] Working with governments means that we:</p> <ul style="list-style-type: none"> <li>• Maintain the highest levels of procurement integrity</li> <li>• Provide accurate submissions of time charging and other costs</li> <li>• Understand and avoid organizational conflicts of interest</li> <li>• Do not hire former government employees without authorization</li> </ul> <p>[p.15] EMPLOYING CURRENT AND FORMER GOVERNMENT PERSONNEL</p> <p>L3Harris employees must understand and abide by the rules and regulations for discussing potential employment opportunities with current or former government employees. To avoid gaining a competitive advantage or obtaining “inside” information during the hiring process, coordinate with an L3Harris Resource prior to discussing employment opportunities or assigning work to former government employees.</p>



<b>Question</b>
<b>4.4. Does the company report details of the contracted services of serving politicians to the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes details of the contracted services of serving politicians.
<b>Evidence</b>
No evidence found.

## 5. Customer Engagement

### 5.1 Contributions, Donations and Sponsorships

<b>Question</b>
<b>5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>Based on publicly available information, there is evidence that the company has a policy on corporate political contributions. The company indicates that political contributions are generally restricted due to legal prohibitions in many jurisdictions, but where they are permitted such donations require sign-off from the Legal Department and the Government Relations Office. There is evidence that any contributions to, or in support of U.S. Federal office candidates are generally prohibited and indicates that any state or local level donations are highly regulated and must be approved in advance. There is evidence that this policy is applicable to all employees and board members, as well as those employed by the company as third parties. In addition, there is evidence that the company is associated with a Political Action Committee (PAC) in the United States, which is overseen by a committee of employees from different business divisions.</p> <p>Since the company does not prohibit political donations and is associated with a PAC, it receives a score of '0' in line with the scoring criteria.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Political Advocacy (GR-01) and State and Local Government Lobbyists (GR-02)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a></p> <p>[p.6] Our Code applies to L3Harris employees, officers and members of the Board of Directors. Following the Code is mandatory.</p> <p>[...] We also expect all third parties with whom we contract, including agents, suppliers and contractors, to comply with the L3Harris Supplier Code of Conduct when conducting business on L3Harris' behalf.</p> <p>[p.20] LOBBYING</p>

Lobbying involves communications with legislators, regulators or their staff in an effort to influence legislative or certain other administrative actions. Many countries prohibit corporations from donating corporate funds, goods or services (including employees' work time), directly or indirectly, to political candidates or parties. Lobbying activities are subject to specific rules that cover a wide range of activities. It is important that all contacts with officials regarding public policy are coordinated through L3Harris' Government Relations Department to ensure all lobbying activities are disclosed.

To ensure compliance with the Byrd Amendment, contribution of L3Harris' funds or the use of its assets or facilities for the benefit of political parties or candidates and engaging with government officials regarding public policy and legislative matters anywhere in the world must be approved in advance by the L3Harris Legal Department.

ADDITIONAL INFORMATION: The Byrd Amendment prohibits the use of contract payments to pay any person for influencing, or attempting to influence, officials of the executive or legislative branches of the U.S. government (including members of Congress and their staffs) in connection with the award or modification of U.S. Government contracts.

[p.35] PARTICIPATING IN POLITICAL ACTIVITIES

L3Harris respects personal participation in the political process by our employees, however, that involvement and participation must be conducted on an individual basis, on your own time and at your own expense. Many countries prohibit corporations from donating corporate funds, goods or services (including employees' work time), directly or indirectly, to political candidates or parties.

**[23] Open Secrets L3Harris Technologies PAC Summary (Webpage)**

Accessed 20/10/2020

<https://www.opensecrets.org/pacs/lookup2.php?strID=C00100321>

**PAC Registration Details**

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Official PAC Name: **L3HARRIS TECHNOLOGIES, INC. PAC**

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Location: WASHINGTON , DC 20024

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Industry: [Defense Electronics](#); Defense electronic contractors

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Treasurer: MALAVE, JAY

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FEC Committee ID: C00100321

*(Look up the documents filed at the FEC)*

<b>Question</b>
<b>5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of its corporate political contributions or Political Action Committee (PAC) disbursements for the most recently reported financial year.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company has a policy and procedure on charitable donations. The company indicates that its board-level Nominating and Governance Committee reviews its charitable donations and philanthropic activities to ensure that they are consistent with the company’s ethical commitments and policies. In addition, the company publishes some narrative information on the charitable causes it supports.</p> <p>However, the company receives a score of ‘1’ because there is no evidence that it publishes full details of its charitable donations and related activities, such as the name, amount and country of each recipient as well as which corporate entity made the payment.</p>
<b>Evidence</b>
<p><b>[10] Nominating And Governance Committee Charter (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf">https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf</a>                  [p.1] L3HARRIS TECHNOLOGIES, INC. NOMINATING AND GOVERNANCE COMMITTEE OF THE BOARD OF DIRECTORS CHARTER I.</p> <p>PURPOSES.</p> <p>The purposes of the Nominating and Governance Committee (the “Committee”) of the Board of Directors (the “Board”) of L3Harris Technologies, Inc. (the “Company”) are to:</p> <p>[...]</p> <p>7. assist the Board in fulfilling its responsibilities to oversee the Company’s: (a) ethics and business conduct program, (b) compliance with sound ethical business practices and legal requirements, and (c) compliance with the goals and objectives set forth in the Company’s Code of Conduct;</p> <p>[p.2] 10. review the Company’s support of charitable, civic, educational and philanthropic contributions and activities, directly or through the L3Harris Foundation or otherwise;</p> <p>[...]</p> <p>2. With respect to ethics, business conduct, environmental, health and safety or other corporate responsibility matters:</p> <p>oversee the Company’s ethics and business conduct program consistent with sound, ethical business practices and legal requirements applicable to the Company;</p> <p>[...]</p> <p>(v) oversee the Company’s: (a) environmental, health and safety programs, and (b) charitable, civic, educational and philanthropic activities;</p> <p><b>[9] Corporate Governance Guidelines (Webpage)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/corporate-governance-guidelines.pdf">https://www.l3harris.com/documents/corporate-governance-guidelines.pdf</a>                  [p.10] (c) Transactions Affecting Director Independence.                  Without the prior approval of a majority of disinterested members of the full Board or an appropriate committee, the Company will not make significant charitable contributions to organizations in which a director or a family member of the director is affiliated, enter into consulting contracts with (or otherwise provide indirect forms of compensation</p>

to) a director, or enter into any relationships or transactions (other than service as a director and Board committee member) between the Company and the director (or any business or non-profit entity or organization in which the director is a general partner, controlling shareholder, officer, manager, trustee or materially financially interested)

**[12] 2016 L3 Annual Report (Document)**

Accessed 07/10/2019

[https://www.l3t.com/sites/default/files/annual-reports/2016\\_l3\\_annual\\_report.pdf](https://www.l3t.com/sites/default/files/annual-reports/2016_l3_annual_report.pdf)

[p.11] COMMITMENT TO COMMUNITY

L3 remains committed to principles of good stewardship and corporate responsibility for the communities in which we live and work. We make contributions at the corporate and local levels and place the utmost importance on those initiatives that assist, serve and honor our U.S. military personnel, veterans and families. L3 is a member of the Employer Partnership of the Armed Forces, an organization that provides employment opportunities to former service members by leveraging their military

[p.12] training and experience. We contribute to charities such as the Bob Woodruff Foundation, which funds programs that meet the needs of our injured heroes, and Homes for Our Troops (HFOT), which builds adaptable housing for veterans. In the last six years, employees from across L3 have donated funds, specialized items and manpower to build six HFOT homes, with more in the works. L3 honors the legacy and sacrifices of our armed services by supporting the capital campaign to build the first-ever National Museum of the U.S. Army.

We provide financial assistance to the Special Operations Warrior Foundation, the Tragedy Assistance Program for Survivors (TAPS), the Marine Corps Scholarship Foundation and the Coast Guard Foundation, just to highlight a few. As a company founded on technology leadership and engineering expertise, L3 has long valued the importance of science, technology, engineering and mathematics (STEM) education. We actively support a wide variety of programs at all education levels through mentoring and educational partnerships in STEM-oriented curricula, and we donate funds to university and college research programs. L3 employees and divisions also contribute significant time, labor and money to causes outside of industry that provide critical support in their communities. In addition to fundraising efforts for medical research, our businesses have raised funds as part of local United Way campaigns and donated food, toys and manpower to help children, families and the elderly

**[3] Code of Conduct (Document)**

Accessed 04/10/2019

<https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf>

[p.35] CORPORATE CITIZENSHIP

Consistent with our ethical culture, L3Harris is committed to good corporate citizenship through its involvement in charitable organizations and community activities. We encourage employees to volunteer in our communities.

As L3Harris deploys innovations that investigate the universe and connect people back on Earth, the company is also investing in one of the most vital components to the future of space – STEM education.

While expanding a wide net of space-based technology used across the globe every day, L3Harris is also building on its legacy of supporting efforts to attract the next generation aerospace workforce through science, technology, engineering and mathematics programs.

**[16] STEM Programmes Support (Webpage)**

Accessed 10/10/2019

<https://www.harris.com/impact/2019/09/l3harris-supports-stem-programs-that-reach-for-the-stars>

In the second half of 2019, the L3Harris Foundation is donating funds to programs aimed at attracting students to space-oriented careers.

L3Harris is working with three major space STEM initiatives:

- Space in the Community – A Space Foundation series of hands-on events in communities around the country aimed at developing STEM pipelines in K-12 educational systems to increase the future workforce and strengthen economic development. Activities include visits with astronauts, classroom projects and professional development workshops for teachers.

- StellarXplorers – An Air Force Association design competition that highlights all aspects of system development and operation focused on spacecraft and payloads. Student teams are given a mission scenario and must design a working solution that includes details like launch vehicle planning, orbit determination and satellite component selection.
- Astronauts Memorial Foundation – A non-profit that includes the Center for Space Education, which hosts STEM educational programs for K-12 grade levels and teacher training at its facility at the Kennedy Space Center Visitors Center on Florida’s Space Coast.

These activities continue a legacy of strong L3Harris support for STEM education that have had a major positive impact on communities where employees live and work. Since 2008, the company has invested more than \$22 million to support STEM projects at the elementary, middle, high school and university levels.

L3Harris employees have also volunteered thousands of hours to directly support STEM education initiatives in their local communities, including giving presentations in classrooms and hosting students at L3Harris facilities. Space-related STEM education initiatives are especially important as the United States is on the cusp of major exploration program expansions in the coming years and decades. American astronauts are scheduled to return to space from U.S. soil before the end of 2019. NASA is also working on the next generation of deep space exploration in the coming years with the Artemis lunar exploration program, which plans to send humans, including the first woman, to the moon by 2024.

By supporting STEM education programs, L3Harris is inspiring the next generation of scientists and engineers that will take space exploration even further into the universe.

#### **[17] Article on Disaster Relief (Webpage)**

Accessed 10/10/2019

<https://www.harris.com/impact/2019/10/l3harris-helps-restore-communications-in-the-bahamas-following-hurricane>

On September 4, L3Harris Communication Systems SATCOM business, received a call from industry peer and friend Obie Johnson. Obie is the CEO of CopaSAT, LLC, a satellite equipment and network services company based in Tampa, Fla.

Johnson was organizing relief efforts to some of the hardest-hit islands of the Bahamas affected by Hurricane Dorian. Employees across the Global Communications Systems sector, including engineering, product test and shipping logistics teams, sprang into action. They quickly and diligently obtained, tested and shipped a 1.8 meter satellite terminal to the Yacht Frigate in Stuart, Fla., for transport to the Bahamas the following day.

“L3Harris really came through when we needed it!” said Johnson. “The team responded immediately, shipping more than 500 pounds of equipment to us overnight.”

With the terminal from L3Harris and satellite bandwidth from CopaSAT, the on-site team in Grand Cay, part of the Abaco Islands, could re-establish communications for roughly 200 people (about a third of the population who were unable to evacuate.)

The 1.8 meter L3Harris terminal has been used to supplement destroyed communications infrastructure to include video, voice and Internet. For example, residents could now use WhatsApp, texting and video calls to let loved ones know they are okay. Satellite communications provided by the L3Harris terminal also benefited the fundraising efforts, helping to more than double donations to the island. Additionally, communications assisted the U.S. State Department in running a medical clinic there.

“The L3Harris satellite terminal was easy to set up and it worked flawlessly,” added Johnson, thanking L3Harris for the teamwork.

[The company’s website contains a number of comparable articles and news releases relating to individual charitable causes the company supports]

## 5.2 Lobbying

<b>Question</b>
<b>5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company has a policy on lobbying which apply to all employees, directors and third parties engaged in lobbying on the company’s behalf. The company indicates that its Government Relations Office is responsible for oversight of all lobbying activities and for contracting any external lobbyists.</p> <p>However, the company receives a score of ‘1’ because in publicly available evidence it does not provide details of specific oversight mechanisms or controls to regulate its lobbying activities, nor does it outline certain standards of lobbying conduct which are expected of its lobbyists. It is noted that the company has a dedicated policy on lobbying which may contain more details on these standards, but this does not appear to be publicly accessible.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Political Advocacy (GR-01) and State and Local Government Lobbyists (GR-02)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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. [...]</li> <li>• 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.</li> <li>• L3Harris complies with all annual lobbying disclosures required by U.S. law.</li> </ul> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.6] Our Code applies to L3Harris employees, officers and members of the Board of Directors. Following the Code is mandatory. We all have an obligation to comply with our Code, our policies and the laws where we do business. Violations are taken seriously at L3Harris and may result in disciplinary action, up to and including termination of employment.</p> <p>As the Code cannot address all of the applicable laws and regulations, please seek guidance from the appropriate L3Harris Resource whenever questions arise. We also expect all third parties with whom we contract, including agents, suppliers and contractors, to comply with the L3Harris Supplier Code of Conduct when conducting business on L3Harris’ behalf.</p> <p>[p.20] LOBBYING</p> <p>Lobbying involves communications with legislators, regulators or their staff in an effort to influence legislative or certain other administrative actions. Many countries prohibit corporations from donating corporate funds, goods or services (including employees’ work time), directly or indirectly, to political candidates or parties. Lobbying activities are subject to specific rules that cover a wide range of activities. It is important that all contacts with officials regarding public policy are coordinated through L3Harris’ Government Relations Department to ensure all lobbying activities are disclosed.</p>



To ensure compliance with the Byrd Amendment, contribution of L3Harris' funds or the use of its assets or facilities for the benefit of political parties or candidates and engaging with government officials regarding public policy and legislative matters anywhere in the world must be approved in advance by the L3Harris Legal Department.

ADDITIONAL INFORMATION: The Byrd Amendment prohibits the use of contract payments to pay any person for influencing, or attempting to influence, officials of the executive or legislative branches of the U.S. government (including members of Congress and their staffs) in connection with the award or modification of U.S. Government contracts.

<b>Question</b>
<b>5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any information on its lobbying aims, topics or activities on its website. The company states that it complies with all annual lobbying disclosures required by law in the United States, however it does not provide a direct link to its disclosures nor does it provide information on its lobbying aims and activities outside the United States (if any).
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com/content/l3harris-anti-corruption-program">https://www.harris.com/content/l3harris-anti-corruption-program</a>                  Political Advocacy (GR-01) and State and Local Government Lobbyists (GR-02)</p> <p>[...]</p> <ul style="list-style-type: none"> <li>L3Harris complies with all annual lobbying disclosures required by U.S. law.</li> </ul>

<b>Question</b>
<b>5.2.3 Does the company publish full details of its global lobbying expenditure?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of its global lobbying expenditure. The company states that it complies with all annual lobbying disclosures required by law in the United States, however it does not provide a direct link to its disclosures nor does it provide information on its lobbying aims and activities outside the United States (if any).
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Political Advocacy (GR-01) and State and Local Government Lobbyists (GR-02)</p> <p>[...]</p> <ul style="list-style-type: none"> <li>L3Harris complies with all annual lobbying disclosures required by U.S. law.</li> </ul>

### 5.3 Gifts and Hospitality

<b>Question</b>
<b>5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence the company has a policy regulating the giving and receipt of gifts and hospitality, to ensure that such expenses are not used as vehicles for bribery. The company’s policy also explicitly addresses the risks associated with gifts and hospitality given to and/or received from public officials.</p> <p>In addition, the company indicates that it has a separate policy document which provides further procedures and establishes financial limits for different sorts of gifts and promotional expenses. There is evidence that all gift and hospitality submissions above a designated financial threshold are recorded centrally in the company’s Business Courtesy Request System.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Providing and Receiving Business Courtesies (LGL-37)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul> <p><b>[1] Anti-Corruption Introduction and Policy Overviews (Webpage)</b>                  Accessed 03/10/2019  <a href="https://www.l3t.com/anti-corruption-statement/anti-corruption-statement">https://www.l3t.com/anti-corruption-statement/anti-corruption-statement</a>                  Corporate Policy 709                  This policy sets forth the ethical standards of conduct and practices that must be followed by L3 in conducting international business. L3 prohibits public and private sector bribery in accordance with the U.S. FCPA, the UK Bribery Act, and other laws enacted pursuant to the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. The policy’s related procedures outline the detailed steps and approvals required for training, hospitality, and appropriate record-keeping.</p> <p>[...]</p> <p>Corporate Policy 002                  This policy requires that L3 transactions are kept free from even the perception that favorable treatment was sought, received, or given in exchange for furnishing or receiving business courtesies. L3 employees are prohibited from giving or receiving business courtesies that constitute, or could be reasonably perceived as constituting, unfair business or a violation of law. Employees must know and understand prohibitions and limitations of the recipient’s organization before offering a business courtesy. Business courtesies must be consistent with marketplace practices, be infrequent in nature, and may not be excessive or lavish.</p> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.18] EXCHANGING BUSINESS COURTESIES</p>

Our business transactions should always be free from even a perception that favorable treatment was sought, received or offered through gifts, favors, hospitality, entertainment or similar gratuities. This is particularly important when dealing with government employees. Business courtesies include tickets, fees or passes to sporting or cultural events, lodging, travel, meals, door prizes and other items of value.

#### IMPORTANT

We are committed to complying with all laws and regulations. We must avoid even the appearance of improper conduct.

#### Providing Business Courtesies to U.S. Government Employees

With few exceptions, U.S. Government agencies have strict prohibitions against their employees accepting any business courtesies. Therefore, except as otherwise permitted by regulation or prior Legal Department approval, we are prohibited from offering or providing any business courtesy to a U.S. Government employee or representative. Modest refreshments, such as soft drinks, tea, coffee and fruit, offered on an occasional basis in conjunction with business activities may be acceptable.

#### Providing Business Courtesies to Non-U.S. Government Employees

Employees and officials of non-U.S. governments are subject to local regulations and their specific agency's rules. L3Harris employees must abide by these regulations when doing business with non-U.S. governments. Our third-party

[p.19] intermediaries or agents that represent L3Harris interests outside the U.S. must also comply with these rules.

#### Providing Gifts and Entertainment to Commercial/ Non-Government Persons

It is our responsibility to inquire about any prohibitions or limitations applicable to the recipient's organization before offering any business courtesy. We may provide meals, refreshments, or entertainment of reasonable value to nongovernment persons in support of business activities, provided:

- The courtesy is not offered to obtain favorable treatment
- The courtesy does not violate any law, regulation, or the standard of conduct of the recipient's organization
- The courtesy is consistent with marketplace practices, infrequent in nature, and is not lavish or extravagant

#### IMPORTANT

Before offering, providing, or accepting business courtesies, review L3Harris' policy or contact the Legal Department for further guidance.

#### Soliciting and Receiving Gifts and Entertainment

Our business transactions should always be free from a perception that favorable treatment was sought, received, or offered through gifts, favors, hospitality, entertainment, or similar gratuities. When receiving business courtesies, we:

- May not solicit, directly or indirectly, business courtesies for our benefit or the benefit of another person
- May not accept business courtesies with an agreement to do anything in return, particularly when involved in contract solicitation or negotiations
- Only accept business courtesies consistent with reasonable marketplace customs and in compliance with L3Harris policy
- Never accept cash or cash equivalents, such as gift cards
- Will decline or return inappropriate business courtesies, or if they cannot be returned, we will turn them over to an Ethics Advisor or Ethics & Compliance staff member

## 6. Supply Chain Management

<b>Question</b>
<b>6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company's procurement department oversees and manages all the company's procurement activities, and that this body is the main body responsible for coordinating procurement activities.</p> <p>However, the company receives a score of '1' because there is no evidence that it assures itself that proper procedures regarding the onboarding of suppliers are followed through a clearly stated means, such as an audit, at least every three years.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Supply Chain (SC-01)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p><b>[19] Supplier Ethics (Webpage)</b>                  Accessed 10/10/2019  <a href="https://www.l3t.com/link/suppliers/supplier-ethics">https://www.l3t.com/link/suppliers/supplier-ethics</a>                  L3 Technologies values its relationships with our suppliers. Suppliers play a critical role in supporting L3 in providing world-class products to our customers around the world.</p> <p>L3 Technologies is committed to providing an environment that fosters fair and impartial opportunities for our suppliers and potential suppliers to compete for awards. This is a key part of L3's Code of Ethics and Business Conduct, and every L3 Link employee, including every procurement representative, is committed to conducting business with honesty, integrity and respect.</p>

<b>Question</b>
<b>6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is evidence that the company has formal procedures in place to conduct risk-based anti-corruption due diligence on all third parties, which includes its suppliers. There is evidence that the company establishes ultimate beneficial ownership as part of due diligence and that it performs enhanced due diligence on any suppliers and third parties identified as high risk.</p> <p>However, there is no clear evidence that the company conducts due diligence on suppliers at least every two years or when there is a significant change in the business relationship. It is also not clear from publicly available information that the company may be willing to review and or/terminate supplier relationships when red flags highlighted in the due diligence process cannot be mitigated. It is noted that the company has a separate policy detailing its due diligence procedures and requirements, but this document does not appear to be publicly available.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Use of Third Parties Operating Outside the United States (LGL-38)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p><b>[2] Ethics (Webpage)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/code-of-ethics">https://www.l3t.com/code-of-ethics</a>                  Corporate Policy 706</p> <p>This policy requires that risk-based due diligence must be performed on prospective third parties both before and throughout the business relationship. The policy’s related procedures outline the detailed steps used to perform due diligence in an attempt to identify any potential risks and red flags. Red flags are addressed with additional due diligence and/or the assistance of legal counsel in order to mitigate potential corruption risks.</p>

**[3] Code of Conduct (Document)**

Accessed 04/10/2019

<https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf>

[p.17] PREVENTING BRIBERY, CORRUPTION AND KICKBACKS

[...]

Employees are prohibited from offering, giving, soliciting or accepting any bribe or kickback, whether dealing with government officials, political parties or representatives of commercial organizations. This means that we:

- Conduct due diligence when hiring or managing third parties as we can be held liable for their actions



<b>Question</b>
<b>6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company requires suppliers to have adequate anti-bribery and corruption policies and procedures in place. The company states that all suppliers must have policies in place that prohibit foreign and domestic bribery and facilitation payments, as well as procedures to address conflicts of interest, gifts and hospitality, and whistleblowing. The company publishes a Supplier Code of Conduct which applies to all third parties and business partners, and indicates that all suppliers must meet, at a minimum, the standards laid out in this document. In addition, there is evidence that the company ensures this compliance at the start of the business relationship and through periodic reviews thereafter.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Use of Third Parties Operating Outside the United States (LGL-38)</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>[...]</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>[18] Supplier Code of Conduct (Document)</b>                  Accessed 10/10/2019  <a href="https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf">https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf</a>                  [p.2] INTRODUCTION</p> <p>The members of the Defense Industry Initiative on Business Ethics and Conduct (DII) (hereinafter “we”) are committed to upholding the highest standards in all our business dealings with the U.S. Government, protecting taxpayer resources, and providing high quality products and services for the men and women of the U.S. Armed Forces and their allies. Complying with all laws and regulations and ensuring fair competition are fundamental to this commitment. This Supplier Code of Conduct expresses the expectations we hold for suppliers throughout the aerospace and defense industry.</p> <p>GENERAL DISCLAIMER</p> <p>This Supplier Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct.</p> <p>DEFINITION</p> <p>For the purposes of this Code, “Supplier” is defined as any third party that directly or indirectly sells, or seeks to sell, any kind of goods or services to our company or on our company’s behalf, including suppliers, contractors,</p>

subcontractors, distributors, dealers, sales/marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators, or similar entities.

#### I. COMPLIANCE WITH LAWS

We expect our suppliers to maintain full compliance with all laws and regulations applicable to their business. When conducting international business, or if their primary place of business is outside the United States, suppliers must comply with local laws and regulations.

#### [p.3] IV. ANTI-CORRUPTION

Our suppliers must comply with the U.S. Foreign Corrupt Practices Act and other applicable anti-corruption laws (e.g., the UK Bribery Act), directives and/or regulations that govern operations in the countries in which they do business, regardless of local customs.

##### A. Improper Payments / Business Courtesies

Our suppliers must refrain from offering or making any payments of money or anything of value (including kickbacks, favors, gifts, gratuities, entertainment, travel, political contributions, charitable donations or other business courtesies) to customers, government officials, political parties, candidates for public office, charities, or other business-related parties that could be considered to improperly influence business decisions. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, except in situations where there is an imminent threat to personal health or safety.

##### B. Due Diligence

We expect our suppliers to exert appropriate due diligence and monitoring to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the engagement of third parties.

[...]

#### V. CONFLICT OF INTEREST

We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with our company. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of our company and personal interests or those of close relatives, friends or associates.

#### [p.4] C. Ethics and Compliance Policies

Commensurate with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code of Conduct. This should include measures to address their compliance within these standards and take appropriate action to correct identified deficiencies. We encourage our suppliers to implement their own written code of conduct and to flow down the principles of a code of conduct to the entities that furnish them with goods and services.

#### **[19] Supplier Ethics (Webpage)**

Accessed 10/10/2019

<https://www.l3t.com/link/suppliers/supplier-ethics>

L3 Technologies is committed to providing an environment that fosters fair and impartial opportunities for our suppliers and potential suppliers to compete for awards. This is a key part of L3's Code of Ethics and Business Conduct, and every L3 Link employee, including every procurement representative, is committed to conducting business with honesty, integrity and respect. We share our standards of business conduct with our suppliers and expect that our suppliers will reflect those standards when conducting business on our behalf.

The L3 Technologies Code of Ethics and Business Conduct can be found under the Suppliers tab.

#### **[3] Code of Conduct (Document)**

Accessed 04/10/2019

<https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf>

[p.4] We also expect all third parties with whom we contract, including agents, suppliers and contractors, to comply with the L3Harris Supplier Code of Conduct when conducting business on L3Harris' behalf.

[p.11] A COMMITMENT TO OUR CUSTOMERS AND BUSINESS PARTNERS

As a trusted partner to our customers and business partners around the world, L3Harris is committed to delivering quality products and services. We hold ourselves accountable for being aware of and following the rules that apply to the work we do. In our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including our agents and business partners.

[p.13] WORKING WITH THE U.S. AND OTHER GOVERNMENTS

In all of our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including, but not limited to, agents, business partners, subcontractors, and other third parties. The rules for providing products, services and solutions to the government or other public sector entities may be more complex and considerably stricter than those that govern our work with commercial customers.

[p.17] We expect the same integrity from all third parties, agents, and anyone else who performs work on L3Harris' behalf.

<b>Question</b>
<b>6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
There is evidence that the company encourages suppliers to flow down the principles and standards outlined in its Supplier Code of Conduct to subcontractors. The company also expects its suppliers to ensure that their anti-corruption standards are maintained throughout their supply chains, for instance by performing due diligence on the third parties with which they engage.
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  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.</p> <p><b>[18] Supplier Code of Conduct (Document)</b>                  Accessed 10/10/2019  <a href="https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf">https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf</a>                  [p.3] B. Due Diligence                  We expect our suppliers to exert appropriate due diligence and monitoring to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the engagement of third parties.</p> <p>[p.4] C. Ethics and Compliance Policies                  Commensurate with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code of Conduct. This should include measures to address their compliance within these standards and take appropriate action to correct identified deficiencies. We encourage our suppliers to implement their own written code of conduct and to flow down the principles of a code of conduct to the entities that furnish them with goods and services.</p> <p><b>[19] Supplier Ethics (Webpage)</b>                  Accessed 10/10/2019  <a href="https://www.l3t.com/link/suppliers/supplier-ethics">https://www.l3t.com/link/suppliers/supplier-ethics</a>                  L3 Technologies is committed to providing an environment that fosters fair and impartial opportunities for our suppliers and potential suppliers to compete for awards. This is a key part of L3's Code of Ethics and Business Conduct, and every L3 Link employee, including every procurement representative, is committed to conducting business with honesty, integrity and respect. We share our standards of business conduct with our suppliers and expect that our suppliers will reflect those standards when conducting business on our behalf.</p>

<b>Question</b>
<b>6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption related reports, investigations or associated disciplinary actions involving its suppliers.
<b>Evidence</b>
No evidence found.

## 7. Agents, Intermediaries and Joint Ventures

### 7.1 Agents and Intermediaries

<b>Question</b>
<b>7.1.1 Does the company have a clear policy on the use of agents?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company has a policy on the use of agents, as part of its policy on third parties. As part of its approach, the company states that it commits to establish and verify whether the use of an agent is necessary to perform a legitimate business function. In addition, there is evidence that the company has specific controls in place to regulate their use, including enhanced risk-based due diligence. There is evidence that this policy applies group-wide to all employees and divisions that may employ agents.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Use of Third Parties Operating Outside the United States (LGL-38)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p><b>[7] 2019 Annual Report (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf">https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf</a>                  [p.16] We historically have utilized indirect sales channels, including dealers, distributors and sales representatives, in the marketing and sale of some lines of products and equipment, both domestically and internationally. These independent representatives may buy for resale or, in some cases, solicit orders from commercial or government customers for direct sales by us.</p>

<b>Question</b>
<b>7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is evidence the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence prior to engaging with agents and intermediaries. There is evidence that higher risk agents or intermediaries are subject to enhanced due diligence, and there is some indication that the company commits to not engage or terminate its engagement with third parties that engage in improper conduct.</p> <p>Although the company indicates that it conducts period renewal reviews of its third parties, there is no clear evidence that due diligence on agents is repeated at least every two years or when there is a significant change in the business relationship.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>  <b>Accessed 12/02/2020</b>  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                      Anti-Corruption Manual (LGL-35.01 &amp; Procedure 706)</p> <p>[...]</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>Use of Third Parties Operating Outside the United States (LGL-38)</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ul>

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.

**[2] Ethics (Webpage)**

Accessed 04/10/2019

<https://www.l3t.com/code-of-ethics>

Corporate Policy 706

This policy requires that risk-based due diligence must be performed on prospective third parties both before and throughout the business relationship. The policy's related procedures outline the detailed steps used to perform due diligence in an attempt to identify any potential risks and red flags. Red flags are addressed with additional due diligence and/or the assistance of legal counsel in order to mitigate potential corruption risks.

[p.17] PREVENTING BRIBERY, CORRUPTION, AND KICKBACKS

As L3Harris employees, regardless of where in the world we live and work, we must all comply with the U.S. Foreign Corrupt Practices Act ("FCPA"), the United Kingdom Bribery Act ("UKBA"), and the anti-corruption laws of the countries in which we operate. Employees are prohibited from offering, giving, soliciting or accepting any bribe or kickback, whether dealing with government officials, political parties or representatives of commercial organizations. This means that we:

- Conduct due diligence when hiring or managing third parties as we can be held liable for their actions



<b>Question</b>
<b>7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is evidence that the company has formal procedures in place to establish the beneficial ownership of agents and intermediaries prior to engaging them. The company indicates that it has procedures to independently verify the beneficial ownership of agents based on an assessment of risk. In addition, there is some indication that the company may review its engagement with third parties if information highlighted in this process is unclear or depending on the possible risks.</p> <p>The company receives a score of ‘1’ because there is no clear evidence it commits to not engage or terminate its engagement with agents or intermediaries if beneficial ownership cannot be established.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Use of Third Parties Operating Outside the United States (LGL-38)</p> <p>[...]</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul>

<b>Question</b>
<b>7.1.4 Does the company’s anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?</b>
<b>Score</b>
<b>2</b>
<b>Comments</b>
<p>There is evidence that the company’s anti-bribery and corruption policy applies to all third parties acting on for or on its behalf, including agents and intermediaries. The company publishes a Supplier Code of Conduct, which requires all third parties, including agents, to adhere to equivalent ethical standards. There is evidence agents and intermediaries are subject to anti-bribery and corruption clauses in their contracts, which include audit and termination rights.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Global Anti-Corruption Policy (LGL-35)</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>[...]</p> <p>Use of Third Parties Operating Outside the United States (LGL-38)</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.6] Our Code applies to L3Harris employees, officers and members of the Board of Directors. Following the Code is mandatory. We all have an obligation to comply with our Code, our policies and the laws where we do business. Violations are taken seriously at L3Harris and may result in disciplinary action, up to and including termination of employment.</p> <p>[...]</p> <p>We also expect all third parties with whom we contract, including agents, suppliers and contractors, to comply with the L3Harris Supplier Code of Conduct when conducting business on L3Harris’ behalf.</p> <p>[p.11] A COMMITMENT TO OUR CUSTOMERS AND BUSINESS PARTNERS                  As a trusted partner to our customers and business partners around the world, L3Harris is committed to delivering quality products and services. We hold ourselves accountable for being aware of and following the rules that apply to the work we do. In our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including our agents and business partners.</p> <p>[p.13] WORKING WITH THE U.S. AND OTHER GOVERNMENTS                  In all of our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including, but not limited to, agents, business partners, subcontractors, and</p>

other third parties. The rules for providing products, services and solutions to the government or other public sector entities may be more complex and considerably stricter than those that govern our work with commercial customers.

### [18] Supplier Code of Conduct (Document)

Accessed 10/10/2019

<https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf>

[p.2] This Supplier Code of Conduct expresses the expectations we hold for suppliers throughout the aerospace and defense industry.

#### GENERAL DISCLAIMER

This Supplier Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct.

#### DEFINITION

For the purposes of this Code, "Supplier" is defined as any third party that directly or indirectly sells, or seeks to sell, any kind of goods or services to our company or on our company's behalf, including suppliers, contractors, subcontractors, distributors, dealers, sales/marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators, or similar entities.

#### I. COMPLIANCE WITH LAWS

We expect our suppliers to maintain full compliance with all laws and regulations applicable to their business. When conducting international business, or if their primary place of business is outside the United States, suppliers must comply with local laws and regulations.

#### [p.3] IV. ANTI-CORRUPTION

[...]

##### A. Improper Payments / Business Courtesies

Our suppliers must refrain from offering or making any payments of money or anything of value (including kickbacks, favors, gifts, gratuities, entertainment, travel, political contributions, charitable donations or other business courtesies) to customers, government officials, political parties, candidates for public office, charities, or other business-related parties that could be considered to improperly influence business decisions. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, except in situations where there is an imminent threat to personal health or safety.

##### B. Due Diligence

We expect our suppliers to exert appropriate due diligence and monitoring to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the engagement of third parties.

#### [p.4] B. Consequences for Violating Code

In the event of a violation of any of the above expectations, we may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, we may be required to report those violations to proper authorities. We reserve the right to terminate our relationship with any supplier under the terms of the existing procurement/purchasing contract.

##### C. Ethics and Compliance Policies

Commensurate with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code of Conduct. This should include measures to address their compliance within these standards and take appropriate action to correct identified deficiencies. We encourage our suppliers to implement their own written code of conduct and to flow down the principles of a code of conduct to the entities that furnish them with goods and services.

<b>Question</b>
<b>7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?</b>
<b>Score</b>
1
<b>Comments</b>
<p>There is some evidence the company addresses and considers incentive structures for agents as a factor in corruption risk. The company states that it has a procedure to review any proposed compensation structures before engaging with third parties.</p> <p>However, the company receives a score of ‘1’ because it does not provide further publicly available information on the way that it incentivises agents. For example, there is no evidence that the company imposes a threshold on the payment of sales commissions to agents, nor that it requires that remuneration be paid in stage payments or into local bank accounts.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Use of Third Parties Operating Outside the United States (LGL-38)</p> <p>[...]</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul>

<b>Question</b>
<b>7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of the agents currently contracted to act for or on its behalf.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any data on ethical or bribery and corruption related reports, investigations or associated disciplinary actions involving its agents.
<b>Evidence</b>
No evidence found.

## 7.2 Joint Ventures

Question
<b>7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?</b>
Score
<b>1</b>
Comments
<p>The company states that it conducts risk-based due diligence on all third parties that pose a heightened corruption risk to the company. There is evidence to suggest that high-risk third parties are subject to enhanced due diligence and that the company seeks to establish the ultimate beneficial ownership of third parties. Although it does not specifically mention joint ventures in its list of entities considered to be third parties, the company references “business partners” and this is understood to cover joint venture partners.</p> <p>Although the company indicates that it conducts period renewal reviews of its third parties, there is no clear evidence that due diligence on joint ventures is repeated at least every two years or when there is a significant change in the business relationship.</p>
Evidence
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Global Anti-Corruption Policy (LGL-35)</p> <ul style="list-style-type: none"> <li>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. [...]</li> </ul> <p>Use of Third Parties Operating Outside the United States (LGL-38)</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>[...]</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>Anti-Corruption Manual (LGL-35.01 &amp; Procedure 706)</p> <p>[...]</p> <ul style="list-style-type: none"> <li>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.</li> </ul>

**[2] Ethics (Webpage)**

Accessed 04/10/2019

<https://www.l3t.com/code-of-ethics>

Corporate Policy 706

This policy requires that risk-based due diligence must be performed on prospective third parties both before and throughout the business relationship. The policy's related procedures outline the detailed steps used to perform due diligence in an attempt to identify any potential risks and red flags. Red flags are addressed with additional due diligence and/or the assistance of legal counsel in order to mitigate potential corruption risks.

**[3] Code of Conduct (Document)**

Accessed 04/10/2019

<https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf>

[p.17] PREVENTING BRIBERY, CORRUPTION, AND KICKBACKS

As L3Harris employees, regardless of where in the world we live and work, we must all comply with the U.S. Foreign Corrupt Practices Act ("FCPA"), the United Kingdom Bribery Act ("UKBA"), and the anti-corruption laws of the countries in which we operate. Employees are prohibited from offering, giving, soliciting or accepting any bribe or kickback, whether dealing with government officials, political parties or representatives of commercial organizations.

This means that we:

- Conduct due diligence when hiring or managing third parties as we can be held liable for their actions



<b>Question</b>
<b>7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture partnerships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence the company establishes and implements anti-bribery and corruption policies with all of its third parties, including joint venture “business partners”. The company indicates that all third parties with which it does business must follow its Supplier Code of Conduct and indicates that partners should implement equivalent standards.</p> <p>However, the company receives a score of ‘1’ because there is no publicly available information that it commits to establishing and implementing anti-corruption procedures in joint ventures in which it has an ownership stake. It is also not clear that the company’s contracts with joint venture partners include anti-corruption clauses with audit and termination rights; the company’s publicly available information indicates that such clauses apply specifically to intermediaries.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Use of Third Parties Operating Outside the United States (LGL-38)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul> <p>[...]</p> <ul style="list-style-type: none"> <li>• 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.</li> </ul> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.11] A COMMITMENT TO OUR CUSTOMERS AND BUSINESS PARTNERS</p> <p>As a trusted partner to our customers and business partners around the world, L3Harris is committed to delivering quality products and services. We hold ourselves accountable for being aware of and following the rules that apply</p>

to the work we do. In our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including our agents and business partners.

[p.13] WORKING WITH THE U.S. AND OTHER GOVERNMENTS

In all of our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including, but not limited to, agents, business partners, subcontractors, and other third parties. The rules for providing products, services and solutions to the government or other public sector entities may be more complex and considerably stricter than those that govern our work with commercial customers.

**[18] Supplier Code of Conduct (Document)**

Accessed 10/10/2019

<https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf>

[p.2] This Supplier Code of Conduct expresses the expectations we hold for suppliers throughout the aerospace and defense industry.

GENERAL DISCLAIMER

This Supplier Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct.

DEFINITION

For the purposes of this Code, "Supplier" is defined as any third party that directly or indirectly sells, or seeks to sell, any kind of goods or services to our company or on our company's behalf, including suppliers, contractors, subcontractors, distributors, dealers, sales/marketing representatives, intermediaries, agents, partners, consultants, resellers, systems integrators, or similar entities.

I. COMPLIANCE WITH LAWS

We expect our suppliers to maintain full compliance with all laws and regulations applicable to their business. When conducting international business, or if their primary place of business is outside the United States, suppliers must comply with local laws and regulations.

[p.3] IV. ANTI-CORRUPTION

Our suppliers must comply with the U.S. Foreign Corrupt Practices Act and other applicable anti-corruption laws (e.g., the UK Bribery Act), directives and/or regulations that govern operations in the countries in which they do business, regardless of local customs.

A. Improper Payments / Business Courtesies

Our suppliers must refrain from offering or making any payments of money or anything of value (including kickbacks, favors, gifts, gratuities, entertainment, travel, political contributions, charitable donations or other business courtesies) to customers, government officials, political parties, candidates for public office, charities, or other business-related parties that could be considered to improperly influence business decisions. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, except in situations where there is an imminent threat to personal health or safety.

B. Due Diligence

We expect our suppliers to exert appropriate due diligence and monitoring to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the engagement of third parties.

[p.4] B. Consequences for Violating Code

In the event of a violation of any of the above expectations, we may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, we may be required to report those violations to proper authorities. We reserve the right to terminate our relationship with any supplier under the terms of the existing procurement/purchasing contract.

**C. Ethics and Compliance Policies**

Commensurate with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code of Conduct. This should include measures to address their compliance within these standards and take appropriate action to correct identified deficiencies. We encourage our suppliers to implement their own written code of conduct and to flow down the principles of a code of conduct to the entities that furnish them with goods and services.

<b>Question</b>
<b>7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is no evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures, beyond ensuring that such partners follow its Supplier Code of Conduct. This could include, for example, stipulating provisions for secondments of its senior management, providing specific anti-corruption training or establishing a separate internal audit function.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Use of Third Parties Operating Outside the United States (LGL-38)</p> <p>Global Anti-Corruption Policy (LGL-35)</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p>[...]</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul> <p>[...]</p> <ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>[3] Code of Conduct (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>                  [p.11] A COMMITMENT TO OUR CUSTOMERS AND BUSINESS PARTNERS</p>

As a trusted partner to our customers and business partners around the world, L3Harris is committed to delivering quality products and services. We hold ourselves accountable for being aware of and following the rules that apply to the work we do. In our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including our agents and business partners.

[p.13] WORKING WITH THE U.S. AND OTHER GOVERNMENTS

In all of our business dealings, we conduct ourselves in an honest and ethical manner and expect the same of everyone who works on our behalf, including, but not limited to, agents, business partners, subcontractors, and other third parties. The rules for providing products, services and solutions to the government or other public sector entities may be more complex and considerably stricter than those that govern our work with commercial customers.

## 8. Offsets

<b>Question</b>
<b>8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is some evidence that the company recognises the corruption risks associated with offset contracting, and there is evidence that it has a dedicated policy in place to regulate such activities. The company indicates that its Global Business Development team is responsible for implementing and monitoring compliance in relation to offset activities.</p> <p>However, the company receives a score of '1' because there is no publicly available evidence that employees within this team receive specific anti-corruption training on the potential corruption risks associated with offsets. It is noted that the company has a separate policy on offset obligations which may contain more information on its approach, but this does not appear to be publicly available.</p>
<b>Evidence</b>
<p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>                  Offset Obligations (BD-02) and Use of Third Parties Operating Outside the U.S. (LGL-38)</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul> <p><b>[7] 2019 Annual Report (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf">https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf</a>                  [p.16] In order to remain competitive in international markets, we also sometimes enter into offset agreements or recourse or vendor financing arrangements to facilitate sales to certain customers.</p> <p>[p.25] Risks of doing business internationally include:</p> <p>[...]</p> <ul style="list-style-type: none"> <li>Contractual obligations to non-U.S. customers may include specific in-country purchases, investments, manufacturing agreements or financial or other support arrangements or obligations, known as offset obligations, that may extend over several years, may require teaming with local companies and may result in significant penalties if not satisfied</li> </ul>

<b>Question</b>
<b>8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations, as part of its overall policy on third parties. There is evidence that the company conducts checks on beneficial ownership of the partner entity and seeks to assure itself of the legitimacy of the investment as part of this due diligence.</p> <p>However, the company receives a score of ‘1’ because there is no publicly available evidence that its due diligence for offsets includes checks on conflicts of interest. While the company refers to periodic renewal reviews of third parties, there is also no evidence that the company refreshes due diligence at least every two years or when there is a significant change in the business relationship or nature of the partner.</p>
<b>Evidence</b>
<p><b>[2] Ethics (Webpage)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/code-of-ethics">https://www.l3t.com/code-of-ethics</a>                  Corporate Policy 706                  This policy requires that risk-based due diligence must be performed on prospective third parties both before and throughout the business relationship. The policy’s related procedures outline the detailed steps used to perform due diligence in an attempt to identify any potential risks and red flags. Red flags are addressed with additional due diligence and/or the assistance of legal counsel in order to mitigate potential corruption risks.</p> <p><b>[22] Anti-Corruption Programme (Webpage)</b>                  Accessed 12/02/2020  <a href="https://www.harris.com/content/l3harris-anti-corruption-program">https://www.harris.com/content/l3harris-anti-corruption-program</a>                  Use of Third Parties Operating Outside the United States (LGL-38)</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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</li> </ul>

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.

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.



<b>Question</b>
<b>8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of its offset programme.
<b>Evidence</b>
No evidence found.

<b>Question</b>
<b>8.4 Does the company publish details about the beneficiaries of its indirect offset projects?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
There is no evidence that the company publishes any details of its indirect offset obligations or contracts.
<b>Evidence</b>
No evidence found.

## 9. High Risk Markets

<b>Question</b>
<b>9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?</b>
<b>Score</b>
<b>0</b>
<b>Comments</b>
<p>There is some evidence that the company acknowledges the increased corruption risks of operating in different markets. However, the company scores '0' because there is no clear publicly available evidence that risk assessments are used to develop tailored mitigation plans or to inform the company's operations in high risk markets.</p>
<b>Evidence</b>
<p><b>[4] Annual Report 2018 10-K Form (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3t.com/sites/default/files/annual-reports/2018_l3_10k.pdf">https://www.l3t.com/sites/default/files/annual-reports/2018_l3_10k.pdf</a>                  [p.17] Our sales to certain international customers expose us to risks associated with operating internationally. For the year ended December 31, 2018, sales to international customers, excluding our international sales made under FMS agreements directly between the U.S. Government and foreign governments, represented approximately 20% of our consolidated sales.</p> <p>Consequently, our businesses are subject to a variety of risks that are specific to international operations, including the following:</p> <ul style="list-style-type: none"> <li>• export regulations that could erode profit margins or restrict exports;</li> <li>• compliance with the U.S. Foreign Corrupt Practices Act and similar non-U.S. regulations;</li> </ul> <p><b>[7] 2019 Annual Report (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf">https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf</a>                  [p.25] Also, a significant portion of our international revenue is from, and a significant portion of our business activity is being conducted with or in, less-developed countries and sometimes countries with unstable governments, or in areas of military conflict or at military installations. Other risks of doing business internationally include:</p> <ul style="list-style-type: none"> <li>• Currency exchange controls, fluctuations of currency and currency revaluations;</li> <li>• The laws, regulations and policies of foreign governments relating to investments and operations, as well as U.S. laws affecting the activities of U.S. companies abroad, including the Foreign Corrupt Practices Act ("FCPA");</li> </ul>

<b>Question</b>																																																																						
<b>9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?</b>																																																																						
<b>Score</b>																																																																						
<b>1</b>																																																																						
<b>Comments</b>																																																																						
<p>There is evidence that the company publishes a list of its fully consolidated subsidiaries and non-fully consolidated holdings on an annual basis. For each entity, the company indicates its full registered name and country of incorporation. The list indicates which subsidiaries are not wholly-owned by the company.</p> <p>However, there is no evidence that the company publishes the specific percentage ownership for each entity that is not wholly-owned, nor does it publish information on the country or countries of operation for each entity. It is also not clear that this list represents all of the company's holdings.</p>																																																																						
<b>Evidence</b>																																																																						
<p><b>[7] 2019 Annual Report (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf">https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf</a>                  [p.137]</p> <p style="text-align: right;"><b>Exhibit 21</b></p> <p style="text-align: center;"><b>L3HARRIS TECHNOLOGIES INC.</b>  <b>SUBSIDIARIES AS OF AUGUST 22, 2019</b>                  (100% direct or indirect ownership by L3Harris Technologies, Inc., unless otherwise noted)</p> <table border="1"> <thead> <tr> <th style="text-align: left;"><u>Name of Subsidiary</u></th> <th style="text-align: center;"><u>State or Other Jurisdiction of Incorporation</u></th> </tr> </thead> <tbody> <tr><td>1231670 Ontario Inc.</td><td style="text-align: center;">Canada</td></tr> <tr><td>AeroElite Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>Aerosim Academy, Inc.</td><td style="text-align: center;">Florida</td></tr> <tr><td>Aerosim Bangkok Company Limited</td><td style="text-align: center;">Thailand</td></tr> <tr><td>Aerosim Technologies, Inc.</td><td style="text-align: center;">Minnesota</td></tr> <tr><td>Aerosim Thai Company Limited</td><td style="text-align: center;">Thailand</td></tr> <tr><td>Airline Placement Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>Airline Recruitment Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>Applied Defense Solutions, Inc.</td><td style="text-align: center;">Delaware</td></tr> <tr><td>Applied Kilovolts Group Holdings Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>Applied Kilovolts Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>Asian Aviation Training Centre Ltd.</td><td style="text-align: center;">Thailand</td></tr> <tr><td>ASV Global, L.L.C.</td><td style="text-align: center;">Louisiana</td></tr> <tr><td>Autonomous Surface Vehicles Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>Autonomous Surface Vehicles, LLC</td><td style="text-align: center;">Louisiana</td></tr> <tr><td>Aviation Communication &amp; Surveillance Systems, LLC</td><td style="text-align: center;">Delaware</td></tr> <tr><td>Aydin Yazilim ve Elektronik Sanayi A.S.</td><td style="text-align: center;">Turkey</td></tr> <tr><td>Azimuth Security Pty Ltd</td><td style="text-align: center;">Australia</td></tr> <tr><td>Azimuth Security Trust</td><td style="text-align: center;">Australia</td></tr> <tr><td>Azimuth Security, LLC</td><td style="text-align: center;">Florida</td></tr> <tr><td>Beijing MAPPS-SERI Technology Company Ltd.</td><td style="text-align: center;">China</td></tr> <tr><td>C.K. Industrial Engineers Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>Calzoni S.r.l.</td><td style="text-align: center;">Italy</td></tr> <tr><td>Combat Advanced Propulsion, LLC</td><td style="text-align: center;">Delaware</td></tr> <tr><td>CR MSA LLC</td><td style="text-align: center;">Delaware</td></tr> <tr><td>CTC Aviation Group Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>CTC Aviation Holdings Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>CTC Aviation International Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>CTC Aviation Services Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>CTC Aviation Training (UK) Limited.</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>Defence Investments Limited</td><td style="text-align: center;">United Kingdom</td></tr> <tr><td>DMRAC-Aviation Corporation - SGPS, Unipessoal LDA</td><td style="text-align: center;">Portugal</td></tr> <tr><td>EAA – Escola de Aviação Aerocondor, S.A.</td><td style="text-align: center;">Portugal</td></tr> <tr><td>Eagle Technology, LLC</td><td style="text-align: center;">Delaware</td></tr> </tbody> </table> <p>[List of companies continues over four pages in alphabetical order]</p>	<u>Name of Subsidiary</u>	<u>State or Other Jurisdiction of Incorporation</u>	1231670 Ontario Inc.	Canada	AeroElite Limited	United Kingdom	Aerosim Academy, Inc.	Florida	Aerosim Bangkok Company Limited	Thailand	Aerosim Technologies, Inc.	Minnesota	Aerosim Thai Company Limited	Thailand	Airline Placement Limited	United Kingdom	Airline Recruitment Limited	United Kingdom	Applied Defense Solutions, Inc.	Delaware	Applied Kilovolts Group Holdings Limited	United Kingdom	Applied Kilovolts Limited	United Kingdom	Asian Aviation Training Centre Ltd.	Thailand	ASV Global, L.L.C.	Louisiana	Autonomous Surface Vehicles Limited	United Kingdom	Autonomous Surface Vehicles, LLC	Louisiana	Aviation Communication & Surveillance Systems, LLC	Delaware	Aydin Yazilim ve Elektronik Sanayi A.S.	Turkey	Azimuth Security Pty Ltd	Australia	Azimuth Security Trust	Australia	Azimuth Security, LLC	Florida	Beijing MAPPS-SERI Technology Company Ltd.	China	C.K. Industrial Engineers Limited	United Kingdom	Calzoni S.r.l.	Italy	Combat Advanced Propulsion, LLC	Delaware	CR MSA LLC	Delaware	CTC Aviation Group Limited	United Kingdom	CTC Aviation Holdings Limited	United Kingdom	CTC Aviation International Limited	United Kingdom	CTC Aviation Services Limited	United Kingdom	CTC Aviation Training (UK) Limited.	United Kingdom	Defence Investments Limited	United Kingdom	DMRAC-Aviation Corporation - SGPS, Unipessoal LDA	Portugal	EAA – Escola de Aviação Aerocondor, S.A.	Portugal	Eagle Technology, LLC	Delaware
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[p.140]

MacDonald Humfrey (Automation) SEA PTE. Ltd.	Singapore
MacDonald Humfrey Automation Middle East Control Systems LLC*	UAE
Manatee Investment, LLC	Delaware
Manu Kai, LLC*	Hawaii
Melbourne Leasing, LLC	Florida
Mustang Technology Group, L.P.	Texas
Narda Safety Test Solutions GmbH	Germany
Narda Safety Test Solutions S.r.l.	Italy
NexGen Communications, LLC	Virginia
Peak Nano Optics, LLC	Delaware
Power Paragon, Inc.	Delaware
Riptide Autonomous Solutions LLC	Delaware
S.C. Harris Assured Communications SRL	Romania
SARL Assured Communications	Algeria
Sovcan Star Satellite Communications Inc.	Canada
SPD Electrical Systems, Inc.	Delaware
Sunshine General Services, LLC	Iraq
TRL Electronics Limited	United Kingdom
TRL Technology Limited	United Kingdom
Wescam Inc.	Canada
Wescam USA, Inc.	Florida

\* Subsidiary of L3Harris Technologies, Inc. less than 100% directly or indirectly owned by L3Harris Technologies, Inc.

**[4] Annual Report 2018 10-K Form (Document)**

**Accessed 04/10/2019**

[https://www.l3t.com/sites/default/files/annual-reports/2018\\_l3\\_10k.pdf](https://www.l3t.com/sites/default/files/annual-reports/2018_l3_10k.pdf)

[p.153]

Exhibit 21

**L3 Technologies, Inc. and Subsidiaries  
As of December 31, 2018**

<u>Name</u>	<u>Jurisdiction</u>
AeroElite Limited	United Kingdom
Aerosim Academy, Inc.	Florida
Aerosim Bangkok Company Limited	Thailand
Aerosim Technologies, Inc.	Minnesota
Aerosim Thai Company Limited	Thailand
Airline Placement Limited	United Kingdom
Airline Recruitment Limited	United Kingdom
Applied Defense Solutions, Inc.	Delaware
Asian Aviation Training Centre Ltd.	Thailand
ASV Global, L.L.C.	Louisiana
Autonomous Surface Vehicles Limited	United Kingdom
Autonomous Surface Vehicles, LLC	Louisiana
Aviation Communication & Surveillance Systems, LLC	Delaware
Azimuth Security Pty Ltd.	Australia
Azimuth Security Trust	Australia
Azimuth Security, LLC	Florida
Beijing MAPPS-SERI Technology Company Ltd.*	China
Calzoni S.r.l.	Italy
C.K. Industrial Engineers Limited	United Kingdom
Combat Advanced Propulsion, LLC*	Delaware
CTC Aviation Group Limited	United Kingdom
CTC Aviation Holdings Limited	United Kingdom
CTC Aviation International Limited	United Kingdom

[List continues over three pages in alphabetical order]

**Question**

**9.3 Does the company disclose its beneficial ownership and control structure?**

**Score**

**2**

**Comments**

There is evidence that the company is publicly listed on the New York Stock Exchange (NYSE) and therefore it is not required to publish further information on its beneficial ownership in order to receive a score of '2'. The company also discloses all shareholders with a stake greater than 5% in its Annual Report.

**Evidence**

**[21] Financial Times Stock Price Data (Webpage)**  
 Accessed 11/10/2019  
<https://markets.ft.com/data/equities/tearsheet/summary?s=LHX:NYQ>



**[4] Annual Report 2018 10-K Form (Document)**  
 Accessed 04/10/2019  
[https://www.l3t.com/sites/default/files/annual-reports/2018\\_l3\\_10k.pdf](https://www.l3t.com/sites/default/files/annual-reports/2018_l3_10k.pdf)  
 [p.4] Upon completion of the merger, Harris shareholders will own approximately 54% and L3 shareholders will own approximately 46% of the combined company, which will be renamed L3 Harris Technologies, Inc.

[p.64] SECURITY OWNERSHIP OF CERTAIN BENEFICIAL OWNERS  
 Based on information available to us as of April 15, 2019, we know of no person who beneficially owned more than five percent of the Common Stock, except as set forth below.

Name and Address of Beneficial Owner	Amount and Nature of Beneficial Ownership	Percent of Class
The Vanguard Group, Inc. 100 Vanguard Blvd. Malvern, PA 19355 <sup>(1)</sup>	8,986,137	11.4%
BlackRock, Inc. 55 East 52nd Street New York, NY 10055 <sup>(2)</sup>	6,073,343	7.7%
ClearBridge Investments, LLC 620 8th Avenue New York, NY 10018 <sup>(3)</sup>	5,147,432	6.5%

(1) Information shown is based on information reported by the filer on a Schedule 13G/A filed with the SEC on February 11, 2019 in which The Vanguard Group, Inc. reported that it has sole dispositive power over 8,880,611 shares of Common Stock, shared dispositive power over 105,526 shares of Common Stock, sole voting power over 90,405 shares of Common Stock and shared voting power over 14,996 shares of Common Stock. The Vanguard Group, Inc. reported that Vanguard Fiduciary Trust Company and Vanguard Investments Australia, Ltd., wholly-owned subsidiaries of The Vanguard Group, Inc., are the beneficial owners of 66,848 shares and 61,212 shares, respectively, of Common Stock as a result of serving as investment manager of collective trust accounts and as investment manager of Australian investment offerings, respectively. (2) Information shown is based on information reported by the filer on a Schedule 13G/A filed with the SEC on February 6, 2019 in which BlackRock, Inc. reported that it has sole dispositive power over 6,073,343 shares of Common Stock and sole voting power over 5,468,366 shares of Common Stock.

<b>Question</b>
<b>9.4 Does the company publish a percentage breakdown of its defence sales by customer?</b>
<b>Score</b>
<b>1</b>
<b>Comments</b>
<p>There is evidence that the company publishes some information on its sales by customer, to indicate that the United States government accounted for 77% of its total sales in its most recently reported financial year. The company indicates that its sales primarily relate to defence products and services, though it does not clearly distinguish between its defence and commercial sales.</p> <p>However, the company receives a score of ‘1’ because there is no evidence that it publishes information on its major customers for defence sales specifically.</p>
<b>Evidence</b>
<p><b>[7] 2019 Annual Report (Document)</b>                  Accessed 04/10/2019  <a href="https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf">https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf</a></p> <p>[p.9] During fiscal 2019, we operated as Harris Corporation, a leading technology innovator, solving customers’ toughest mission-critical challenges by providing solutions that connect, inform and protect. We supported government and commercial customers in more than 100 countries, with our largest customers being various departments and agencies of the U.S. Government and their prime contractors. Our products, systems and services had defense and civil government applications, as well as commercial applications.</p> <p>[p.16] Fiscal 2019 international revenue came from a large number of countries, and no single foreign country accounted for more than 5 percent of our total revenue.</p> <p>[p.21] We depend on U.S. Government customers for a significant portion of our revenue, and the loss of these relationships, a reduction in U.S. Government funding or a change in U.S. Government spending priorities could have an adverse impact on our business, financial condition, results of operations and cash flows.</p> <p>We are highly dependent on sales to U.S. Government customers, primarily defense-related programs with the DoD and a broad range of programs with the U.S. intelligence community and other U.S. Government departments and agencies. The percentage of our revenue that was derived from sales to U.S. Government customers, including foreign military sales funded through the U.S. Government, whether directly or through prime contractors, in fiscal 2019, 2018 and 2017 was approximately 77 percent, 75 percent and 74 percent, respectively. Therefore, any significant disruption or deterioration of our relationship with the U.S. Government (in particular, the DoD) would significantly reduce our revenue and have an adverse impact on our business, financial condition, results of operations and cash flows.</p> <p>[p.24] We are dependent on sales to customers outside the U.S. The percentage of our total revenue represented by revenue from products, systems and services where the end consumer is located outside the U.S., including foreign military sales through the U.S. Government, in fiscal 2019, 2018 and 2017 was 22 percent, 23 percent and 25 percent, respectively.</p>

## 10. State-Owned Enterprises (SOEs)

<b>Question</b>
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>



<b>Question</b>
10.2 Are the SOE's commercial and public policy objectives publicly available?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.4 Is the SOE's audit committee composed of a majority of independent directors?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

<b>Question</b>
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
<b>Score</b>
N/A
<b>Comments</b>
N/A
<b>Evidence</b>

**List of Evidence & Sources**

<b>N o.</b>	<b>Type</b> <i>(Webpage or Document)</i>	<b>Name</b>	<b>Download Date</b>	<b>Link</b>
01	Webpage	Anti-Corruption Introduction	03/10/19	<a href="https://www.l3t.com/anti-corruption-statement/anti-corruption-statement">https://www.l3t.com/anti-corruption-statement/anti-corruption-statement</a>
02	Webpage	Ethics	04/10/19	<a href="https://www.l3t.com/code-of-ethics">https://www.l3t.com/code-of-ethics</a>
03	Webpage	Code of Conduct	04/10/19	<a href="https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf">https://www.l3t.com/sites/default/files/pdf/ethics/l3harriscodeofconduct.pdf</a>
04	Document	Annual Report 2018 10-K Form	04/10/19	<a href="https://www.l3t.com/sites/default/files/annual-reports/2018_l3_10k.pdf">https://www.l3t.com/sites/default/files/annual-reports/2018_l3_10k.pdf</a>
05	Webpage	Our Culture	04/10/19	<a href="https://www.l3harris.com/who-we-are/our-culture">https://www.l3harris.com/who-we-are/our-culture</a>
06	Document	Proxy Statement 2019	04/10/19	<a href="https://www.l3harris.com/documents/L3Harris-2019-Proxy-Statement.pdf">https://www.l3harris.com/documents/L3Harris-2019-Proxy-Statement.pdf</a>
07	Document	Annual Report 2019	04/10/19	<a href="https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf">https://www.l3harris.com/documents/L3Harris-2019-Annual-Report.pdf</a>
08	Document	Complaint Procedures	04/10/19	<a href="https://www.l3harris.com/documents/BOD-19-236_Complaint_Procedures.pdf">https://www.l3harris.com/documents/BOD-19-236_Complaint_Procedures.pdf</a>
09	Webpage	Corporate Governance Guidelines	04/10/19	<a href="https://www.l3harris.com/documents/corporate-governance-guidelines.pdf">https://www.l3harris.com/documents/corporate-governance-guidelines.pdf</a>
10	Document	Nominating And Governance Committee Charter	04/10/19	<a href="https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf">https://www.l3harris.com/documents/nominating-and-governance-committee-charter.pdf</a>
11	Webpage	Ethics - Our Program – Video	04/10/19	<a href="https://www.l3t.com/video/l3-ethics-our-program">https://www.l3t.com/video/l3-ethics-our-program</a>
12	Webpage	2016 L3 Annual Report	07/10/19	<a href="https://www.l3t.com/sites/default/files/annual-reports/2016_l3_annual_report.pdf">https://www.l3t.com/sites/default/files/annual-reports/2016_l3_annual_report.pdf</a>
13	Webpage	Ethics Point reporting Website	08/10/2019	<a href="https://secure.ethicspoint.com/domain/media/en/gui/17948/index.html">https://secure.ethicspoint.com/domain/media/en/gui/17948/index.html</a>
14	Webpage	Ethics Point – Make A Report	08/10/19	<a href="https://secure.ethicspoint.com/domain/media/en/gui/17948/report.html">https://secure.ethicspoint.com/domain/media/en/gui/17948/report.html</a>
15	Document	2015 Repair and Aftermarket Services	08/10/19	<a href="https://www.l3avionics.com/media/39718/2015_aps_mro_pb.pdf">https://www.l3avionics.com/media/39718/2015_aps_mro_pb.pdf</a>
16	Webpage	STEM Programmes Support	10/10/19	<a href="https://www.harris.com/impact/2019/09/l3harris-supports-stem-programs-that-reach-for-the-stars">https://www.harris.com/impact/2019/09/l3harris-supports-stem-programs-that-reach-for-the-stars</a>

17	Webpage	Article on Disaster Relief	10/10/19	<a href="https://www.harris.com/impact/2019/10/l3harris-helps-restore-communications-in-the-bahamas-following-hurricane">https://www.harris.com/impact/2019/10/l3harris-helps-restore-communications-in-the-bahamas-following-hurricane</a>
18	Document	Supplier Code of Conduct	10/10/19	<a href="https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf">https://www.l3t.com/sites/default/files/supplier-forms/l3harrissuppliercodeofconduct.pdf</a>
19	Webpage	Supplier Ethics	10/10/19	<a href="https://www.l3t.com/link/suppliers/supplier-ethics">https://www.l3t.com/link/suppliers/supplier-ethics</a>
20	Webpage	Open Ownership Search	11/10/19	<a href="https://register.openownership.org/search?utf8=%E2%9C%93&amp;q=l3+harris+technologies+inc">https://register.openownership.org/search?utf8=%E2%9C%93&amp;q=l3+harris+technologies+inc</a>
21	Webpage	Financial Times Stock Price Data	11/10/19	<a href="https://markets.ft.com/data/equities/tearsheet/summary?s=LHX:NYQ">https://markets.ft.com/data/equities/tearsheet/summary?s=LHX:NYQ</a>
22	Webpage	Anti-Corruption Programme	12/02/20	<a href="https://www.harris.com//content/l3harris-anti-corruption-program">https://www.harris.com//content/l3harris-anti-corruption-program</a>
23	Webpage	Open Secrets L3Harris Technologies PAC Summary	20/10/20	<a href="https://www.opensecrets.org/pacs/lookup2.php?strID=C00100321">https://www.opensecrets.org/pacs/lookup2.php?strID=C00100321</a>