Corporate Headquarters
Corporate Policy Statement CPS-564
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Harassment-Free Workplace

Reporting and Investigating Harassment Complaints
Violations

General Applicability Statement

1.0 Policy

Lockheed Martin is committed to maintaining a work environment that is free of physical, psychological, and verbal harassment, or other abusive conduct.

2.0 Applicability

This policy applies to Lockheed Martin employees. It also applies to the conduct of Lockheed Martin employees with respect to contractors, suppliers, business partners, visitors, customers, and other persons in connection with employment at Lockheed Martin; and conversely to their treatment of Lockheed Martin employees.

3.0 Scope

This policy governs conduct in the workplace (any place where Lockheed Martin employees perform work for Lockheed Martin) as well as off-premises situations with a relationship to the workplace or that affect the workplace.

4.0 Implementation

4.1 Lockheed Martin prohibits verbal or physical conduct that offends, abuses, intimidates, torments, degrades, or threatens a person on the basis of any category protected under federal, state, or local law including, but not limited to race, ethnicity, religion, color, sex, pregnancy, national origin, age, military veteran's status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability and medical condition. Examples of prohibited conduct include but are not limited to:

- unwelcome touching, assault, impeding or blocking movements;
- accessing, transmitting, or displaying offensive messages, images, or cartoons;
- making or using derogatory comments, epithets, slurs, jokes, or objects; and

- sexual harassment in any form, including gender-based harassment of a person of the same sex.

4.2 Examples of sexual harassment include but are not limited to:

- unwanted sexual advances, including verbal sexual advances and propositions;
- offering employment benefits in exchange for sexual favors;
- making or threatening reprisals after a negative response to sexual advances;
- leering, making sexual gestures;
- displaying pornographic or sexually suggestive objects or pictures, cartoons, or posters;
- using inappropriate terms of endearment;
- verbal abuse of a sexual nature;
- graphic verbal commentaries about an individual's body;
- sexually degrading words used to describe an individual; and
- suggestive or obscene letters, notes, or invitations.

Reporting and Investigating Harassment Complaints

4.3 Follow the procedure below to report a harassment complaint.

Step	Action	Responsible
1.	If you believe that you have been harassed, you should inform the individual directly that the conduct is unwelcome and must stop, provided you are comfortable doing so. If you have questions or concerns about whether or how to address the person responsible for the conduct, consult your Human Resources department or Human Resources Compliance office.	Employee
2.	Promptly report the facts of the incident to your supervisor, your Human Resources department, or your local Human Resources Compliance office. If the complaint concerns your supervisor, report the incident directly to Human Resources or the Human Resources Compliance office.	Employee
3.	Ensure that the incident is investigated promptly and thoroughly and, depending on the results of the investigation, that the appropriate actions/disciplinary measures, up to and including termination from employment, are taken. Note: Supervisors must not independently investigate complaints of harassment. If a complaint is reported to a supervisor, then the supervisor must promptly report it to the local Human Resources department or Human Resources Compliance office, which will be responsible for managing the investigation.	Human Resources or Human Resources Compliance Office

4.4 Human Resources or the Human Resources Compliance office will conduct investigations of suspected violations of this policy in accordance with CRX-021, Internal Investigations. Human

Resources or the Human Resources Compliance office will conduct disciplinary adjudications under this policy and may consult with cognizant management. Management will participate in investigations if requested and in disciplinary adjudications of employees suspected of violation of this policy. Employees are expected to cooperate in such investigations. Failure or refusal to cooperate or providing false, deliberately deceptive, or intentionally misleading information may result in disciplinary action, up to and including termination from employment.

4.5 Human Resources or the Human Resources Compliance office will ensure that investigations are properly documented and appropriate records are maintained. Investigations and related records will be handled with the highest degree of confidentiality possible except, for example, where disclosure is required by law, regulation, or legal process, or is necessary to allow investigation of the complaint.

4.6 Retaliation against any employee for raising or filing a harassment complaint covered under this policy or participating in the investigation of a complaint covered under this policy is prohibited. If you believe that you have been retaliated against for reporting a complaint or participating in the investigation process, you should report the incident to your local Human Resources department or Human Resources Compliance office, which will be responsible for managing the investigation.

4.7 Any complaint that an employee was harassed by a contractor, supplier, business partner, visitor, or customer will be reported to Human Resources or the Human Resources Compliance office, who will communicate with the appropriate representative of the third-party company or agency as needed to investigate and resolve the incident.

4.8 Any complaint that a contractor, supplier, business partner, visitor, or customer was harassed by an employee will be reported to Human Resources or the Human Resources Compliance office, who will conduct an investigation of the suspected violation and disciplinary adjudication as appropriate.

4.9 You may report incidents directly to the Ethics Office in accordance with CPS-001, Ethics and Business Conduct. The Ethics Office will consult, as appropriate, with the local Human Resources department or Human Resources Compliance office to determine responsibility for conducting the investigation.

4.10 Some states have additional requirements for harassment-free workplace policies or harassment complaint reporting procedures. See Lockheed Martin's Illinois Harassment-Free Workplace Policy for Illinois employees. See Lockheed Martin's New York Harassment-Free Workplace Policy for New York employees. See Lockheed Martin's Puerto Rico Harassment-Free Workplace Policy and Lockheed Martin's Puerto Rico Protocol to Prevent, Report, and Manage Sexual Harassment Claims for Puerto Rico employees. See additional harassment complaint procedures for Massachusetts employees. Contact Human Resources, or your Human Resources Compliance office if you have questions.

5.0 Violations

Lockheed Martin will adhere to a "zero tolerance" approach in the enforcement of this policy, with our goal being to maintain a safe and secure workplace consistent with our corporate values to do what's right, respect others, and perform with excellence. Zero tolerance means that we will investigate thoroughly and objectively any report of violation of this policy by any

leader, employee, or non-employee. We will take appropriate action, up to and including termination from employment, whenever such inappropriate behavior occurs.

6.0 Responsibilities

Human Resources and Human Resources Compliance Office

6.1 Communicate the provisions of this policy to employees. Such communications could include publishing articles in local company publications, placing posters in the workplace, and conducting appropriate training.

Management

6.2 Ensure that employees and unions representing employees are aware of Lockheed Martin's policy prohibiting harassment.

6.3 Foster a work environment that supports the objectives of this policy.

6.4 Promptly notify Human Resources or the Human Resources Compliance office of any employee complaints or reports under this policy.

7.0 General

7.1 Nothing in this policy is intended to conflict with federal, state, or local law, or applicable collective bargaining agreement. To the extent any provision in this policy is inconsistent with any federal, state, or local law or collective bargaining agreement; those laws or collective bargaining agreements will govern and supersede any conflicting terms of this policy. Lockheed Martin complies with additional sexual harassment prevention requirements of individual states as necessary.

7.2 No provisions of this or any other Lockheed Martin policy or procedure will be construed as an employment agreement. Employment with Lockheed Martin can be terminated at any time, with or without cause, either by the employee concerned or by Lockheed Martin.

7.3 Any deviation from this policy requires the prior approval of the Owner listed in Lockheed Martin Command Media Central or designee.

//s// Rhom A. Erskine
Vice President HR Compliance