



ADDENDUM SINGAPORE

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

The L3 Code of Ethics and Business Conduct (“Code”) applies to everyone who does business on behalf of L3 - employees, officers and members of our Board of Directors. It also may apply to agents, consultants, contract labor and others who act on L3’s behalf. Above all, every L3 employee must conduct himself or herself in an ethical manner.

Specifically, everyone who represents L3 will ensure that:

- ✓ Ethical behavior is the foundation by which we conduct our business
- ✓ We do not take advantage, or abuse our position for personal gain or otherwise knowingly violate the law
- ✓ Our actions do not create, directly or indirectly, a conflict of interest
- ✓ We seek guidance when necessary

Requirements

If you are a U.S. citizen working outside of the United States, you are required to abide by United States laws, as well as the laws and regulations of the country in which you are employed. All other individuals may or may not be subject to both U.S. and foreign laws, depending on the circumstances. In situations where you are uncertain about whether a particular law applies, consult with your Manager or the Legal Department immediately.

This addendum describes specific areas of Singapore law that complement the existing requirements of the Code and is meant to be read in conjunction with the Code.

NOTE: The laws in Singapore comprise the laws as set out in the statutes enacted by the Singapore Parliament as well as applicable principles of common law. L3 employees, officers, members of our Board of Directors, agents, consultants, contract labor and others who act on L3’s behalf in Singapore are required to consult the location’s Legal department on any question about the applicable laws.

Avoiding Kickbacks/Soliciting and Receiving Gifts and Entertainment; Avoiding Bribery and Improper Payments

The Prevention of Corruption Act (Cap 241) prohibits giving or soliciting a bribe/kickback/gratification (gratuity), in return for favours (whether actual or anticipated). An offence under this Act carries criminal penalties. Further, the Act has extra-territorial jurisdiction – i.e., where an offence under the Act is committed by a citizen of Singapore in

any place outside Singapore that individual may be dealt with as if the offence had been committed in Singapore.

Insider Trading

The provisions of the Securities and Futures Act (Cap 289) are also applicable to insider trading.

Avoiding Conflicts of Interest

Under Singapore law, employees are under a duty of fidelity in respect of their employer even if this is not expressly stipulated in the employment contract. Therefore, you have to act in the Company's interest at all times. This means you should not prefer your own interest over the Company's, and should not engage in any work that in any way conflicts or potentially conflicts with the Company's interests.

In particular, you must, during your working hours, devote your entire time and use your best endeavours to promote our business and interests. You may not be otherwise employed for any purpose during working hours. In addition, you may not at any time engage in, be employed by, or otherwise associated with, any outside enterprise, venture, or commercial activity that may be in conflict with the requirements of your employment or the Company's interests without obtaining prior written authorization.

Also note that the provisions of the Employment Act (Cap 91) are applicable to certain categories of employees. In addition, directors are subject to the duties and obligations as prescribed in the Companies Act (Cap 50).

Maintaining Accurate Books and Records

Failing to maintain accurate books and records may result in an offence under various statutes, and be punishable by a penal sentence, including under the Penal Code (Cap 224) particularly where falsification of documents is involved.

Confidentiality of Information

The Computer Misuse Act (Cap 50A) prohibits unauthorised access or modification to materials and devices covered under the Act.

The Official Secrets Act (Cap 213) prohibits unauthorised procurement, retention and communication of official documents and information.

Competition Laws

The provisions of the Competition Act (Cap 50B) apply. This Act specifies transactions that are prohibited as being "anti-competitive."

The Consumer Protection (Fair Trading) Act (Cap 52A) provides for the protection of consumers against unfair practices and related matters.

The Consumer Protection (Trade Descriptions and Safety Requirements) Act (Cap 53) prohibits wrongful descriptions of goods supplied in the course of trade and advertisements.

Drug and Alcohol Abuse

It should be emphasised that Singapore penalises heavily the possession and consumption of illegal drugs. A person in possession of prescribed quantities of illegal drugs may be presumed to be trafficking in the drugs, an offence that may be punishable by death. There are also offences for alcohol abuse and it is an offence under the Penal Code to appear in any public place, or trespass and cause annoyance to any person, while intoxicated.

Sexual Harassment

Harassment within and outside the workplace is an offence and is punishable under the Protection from Harassment Act. Sexual harassment can occur when one party at workplace demonstrates behaviour that causes or is likely to cause harassment, alarm or distress to another party. This involves threatening, abusive or insulting words, behaviours or communications. Victims can either report the harassment to their supervisor, manager, HR or they can file reports with the Ministry of Manpower and the police.

Manufacture/Import/Export of Products and Environmental Protection

Statutes that may be relevant for consideration in relation to our activities include: Control of Manufacture Act (Cap 57), Environmental Pollution Control Act (Cap 94A), Environmental Public Health Act (Cap 95), Hazardous Waste (Control of Export, Import and Transit) (Cap 122A), Regulation of Imports and Exports Act (Cap 272A) and Strategic Goods (Control) Act (Cap 300).

Mandatory Obligation to Disclose Certain Misconduct

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

Personal Data

The Personal Data Protection Act 2012 prohibits the unauthorised collection, use or disclosure of personal data by organisations. “Personal data” refers to data about an individual who can be identified from either that data or together with other data or information to which the organisation is likely to have access.

To comply with the Act, we may not collect, use or disclose personal data about an individual unless consent is first obtained.

We may not, as a condition of providing a product or service, require the individual to consent to the collection, use or disclosure of his or her personal data beyond what is reasonable to provide that product or service.

Further, we must make reasonable security arrangements to protect the personal data that we possess or control to prevent unauthorised access, collection, use disclosure or similar risks.