



ADDENDUM

DENMARK

Our Code, as well as this addendum, is provided as guidance in conducting your L-3 responsibilities. These documents are not intended to be all inclusive. You should seek guidance from the Legal Department as conflicts arise.

The L-3 Code of Ethics and Business Conduct (Code) applies to everyone who does business on behalf of L-3 - employees, officers and members of our Board of Directors. It also may apply to agents, consultants, contract labor and others who act on L-3's behalf. Above all, every L-3 employee must conduct himself or herself in an ethical manner.

Specifically, everyone who represents L-3 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.

There are some laws particularly applicable to doing business in Denmark. This addendum describes specific areas of Danish law that complement the existing requirements of the Code and is meant to be read in conjunction with the Code.

Gifts and Entertainment with Official and Third Party Representatives

According to the Danish Criminal Act (*Straffeloven*) bribery (Sections 122 and 144) and kickbacks (Section 299) are illegal. If the principles outlined in the Code are followed, you will not act in conflict with Danish law.

Thus, you should not give, offer, or promise to give a bribe to a public or corporate officer or give anything of value to an officer for the purpose of improperly influencing a decision of conducting business with L-3.

Mandatory Obligation to Disclose Certain Misconduct

The U.S. Federal Acquisition Regulation (FAR) requires the mandatory disclosure of credible evidence of U.S. federal criminal law violations involving fraud, conflict of interest, bribery, or gratuity violations, as well as claims under the U.S. Civil False Claims Act, and significant overpayments. This mandatory disclosure obligation continues up through three years after contract close-out.

In order to comply with these obligations, all L-3 employees must immediately report any issues that could potentially constitute a violation of criminal or civil law, or signifi-



cant 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.

If you comply with the principles outlined in the Code you will act in compliance with Danish law.

No Insider Trading

According to the Danish Public Companies Act (*Aktieselskabsloven*) and the Danish Act of Trading Securities (*Værdipapirhandelsloven*) – the latter relating to companies listed on a stock exchange – insider trading is prohibited.

Thus, you may not deal in securities whilst in possession of price sensitive information relating to L-3 or any of our collaborators that is not generally available.

Communication with the Media

According to the Danish Constitution (*Grundloven*) everyone enjoys freedom of speech. L-3 obviously does not violate this fundamental principle, but under Company policies you should not respond to enquiries from the press on any issues relating to the business of L-3.

Trade Secrets and Technical Drawings

According to the Danish Marketing Practices Act (*Markedsføringsloven*) an employee must not improperly obtain or try to obtain knowledge about the trade secrets of a business. Even if an employee has gained knowledge of the trade secrets of a business in a lawful manner, the employee must not (unless authorized) pass on or make use of such secrets. This prohibition is valid for three years following the expiry of the contract of service.

If you, during the course of your employment, have been entrusted with technical drawings, specifications, formulas, models, etc. (even if such are publicly available) you may not make use of such material or put others (even family) in a position to do so without authorization.

Use of Information System Assets

According to Danish case law an employer must consider the integrity and secrecy of e-mails marked by an employee as "private" or identified in a similar way as being of a personal nature. Similar principles apply if the employer wishes to monitor or log the employees' activities on the Internet.

You should be aware, however, that the Code shall be viewed as a policy under which L-3 reserves the right to monitor or make records of all such electronic communications to verify that Company policies are being followed or for other legitimate business reasons.

Non-Discrimination; Safeguarding Health and Safety

According to the Danish Discrimination Acts (*Ligestillingslovene*) it is unlawful to treat people less favorably because of age, race, gender, sexual orientation and disabilities in the area of employment, including advertising, recruitment, selection, training, and promotion opportunities as well as the terms and conditions of employment.



According to the Danish Act on Working Environment (*Arbejdsmiljøloven*), an employer shall ensure a good working environment by instructing and supervising employees as well as by making sure the working premises are in good and safe conditions.

Environmental Laws; Safeguarding Nature

According to the Danish Environmental Act (*Miljøloven*) companies in the business of production or processing shall implement principles of ecologically sustainable development and assess processes on activities that are likely to have significant positive impacts on the environment.

Competition Laws; Antitrust

According to the Danish Competition Act (*Konkurrenceloven*) as well as EU regulation on antitrust – including EC-Treaty provisions on fair trading, transparency and acknowledgement – unreasonable restrictive trade practices and unfair competition are prohibited.

Public Procurement Rules

When contracting with public authorities, public procurement rules apply. If a contract exceeds the EU threshold value, the rules in the EU public procurement directives must be followed. The Community Directive on public works, supplies and services (2004/18/EC) and the Community Directive concerning procurement procedures of entities operating in the water, energy, transport and telecommunications sectors (2004/17/EC) were implemented into the Danish legal system by governmental orders on 16 September 2004.

National Security

When contracting with Danish defense agencies, all officers of the contracting party must be security cleared, and the contracting party usually has to act in accordance with specific regulations, including extended confidentiality obligations. If goods of a military nature are to be exported from Denmark appropriate permits/licenses shall be obtained prior to shipment.