



Policy: Government Relations

Policy No.: 1207

Responsible Officer: Senior VP, General Counsel and Secretary

1.0 Purpose

The purpose of this policy is to ensure that the Company effectively and lawfully manages its relationship and interaction with the United States Congress.

2.0 Background

The congressional branch of the United States government can impact the Company in a variety of ways, including the annual process of authorizing and appropriating funds in support of programs in which the Company has an interest, periodic requests for testimony or information relating to legislative, investigative or policy initiatives and the enactment of tax, employment, environmental or other legislation affecting the Company, its customers or employees. To enhance its reputation and effectiveness as a federal government contractor, and to protect interests vital to the Company, it is wholly appropriate for the Company to engage in congressional activities. In doing so, the Company must adhere rigorously to all applicable laws, including those relating to lobbying and campaign finance, and to its own values of integrity and accountability.

3.0 Congressional Activities

The Vice President of Government Affairs, a registered lobbyist under the Lobbying Reform Act of 1994, has primary responsibility for management of the Company's relationship and interactions with the United States Congress.

To ensure that the Company's messages are consistent and coordinated, to balance the sometimes competing priorities of the Company's various lines of business, and to ensure compliance with law and Company values, all employees must adhere to the following:

All consultants retained for the purpose of lobbying or conducting other congressional activities must be retained, coordinated and supervised by the Vice President of Government Affairs.

All communications, contacts and meetings with members of the United States Congress, and with their congressional and committee staffs, must be coordinated through the Vice President of Government Affairs, in advance, except as provided below.

If a Company employee is contacted by a member of Congress, or by congressional or committee staffs, or encounters any of them without an opportunity to consult with others in advance, that employee must promptly notify the Vice President of Government Affairs and coordinate with the Vice President of Government Affairs if there is any response to or actions arising out of or related to that contact.

If an employee of the Company contacts his or her congressional representatives in connection with a matter of personal concern to the employee, the employee must identify himself or herself as an individual constituent, not a representative of the Company.

4.0 Political Contributions/DAYPAC

See Policy 1205.