

# CODE OF BUSINESS ETHICS AND CONDUCT





# OUR MISSION—VISION—VALUES

WE PROVIDE INNOVATIVE SOLUTIONS  
THAT **PROTECT & SAVE LIVES**

Our Mission, Vision and Values reinforce Elbit Systems of America's core standards and drive our culture of collaboration, ethical decision making and accountability.



## OUR MISSION

We provide innovative solutions that protect and save lives.



## OUR VISION

To be the solution of choice for critical missions and needs.



## OUR VALUES

Values represent the fundamental beliefs that define how we conduct business. They are principles that reflect the company's culture and guide internal conduct, as well as relationships with customers, partners, and stakeholders.

### DO THE RIGHT THING

We respect people for who they are and for their knowledge, skills, and experience as individuals and as team members. We incorporate ethics, honesty, integrity, and fairness into our daily work.

### MAKE A DIFFERENCE

We perform high-quality work knowing that it saves lives. We foster an entrepreneurial and collaborative workforce to find ways to improve ourselves and our business.

### COMMIT TO CUSTOMER NEEDS

We gain the trust of our customers by committing to their needs. We honor their trust by responding to those needs with winning solutions.

### EMBRACE ONE ELBIT FAMILY

We foster an inclusive environment of camaraderie and friendship among our employees to make Elbit America an enjoyable and rewarding place to work. We are active participants in the communities where we work.



# INTRODUCTION FROM PRESIDENT AND CEO

*The quality of a corporation is a reflection of the quality of its people.*

## DEAR COLLEAGUES,

Welcome to Elbit Systems of America's updated *Code of Business Ethics and Conduct* ("Code"). As before, our Code sets forth the standards by which we conduct our operations. It covers a range of subjects, including respect in the workplace, use of corporate resources, gifts and conflicts of interest and protecting confidential information. It applies to all employees and members of our Board of Directors, and sets a clear expectation that our standards must be followed in all job-related activities, regardless of circumstances or business pressures.

Our Code reinforces our core values: do the right thing, make a difference, commit to customer needs and embrace one Elbit family.

The Code cannot anticipate every situation you may encounter in your daily work. Rather, it outlines our basic principles and standards for you to understand and apply, and it serves as a reference should you have questions or concerns. Importantly, the Code is not a substitute for your own good judgment. If you are ever unsure of the right action to take, ask.

As part of a publicly traded company, there are more formal rules and expectations by which we are governed and, as such, our Code is closely aligned with our parent Company, Elbit Systems Ltd.

I ask that you read our Code carefully and follow it, along with our policies and the law. If you have any questions, the Code includes references and information about other resources that are available. Please remember that open communication and feedback are key to our success. If you have any questions or concerns it is important that you speak up.

We are truly fortunate to have outstanding employees throughout the one Elbit Systems of America family. I know I can count on each of you to use good judgment and to always keep in mind our *Mission, Vision and Values*.

Working together we will not only continue to grow, but we will always be proud of how we achieve our success. Thank you for your continued support and hard work.

A handwritten signature in black ink, appearing to read 'Raanan I. Horowitz'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Raanan I. Horowitz

*President and Chief Executive Officer  
Elbit Systems of America, LLC*

# TABLE OF CONTENTS

<b>INTRODUCTION .....</b>	<b>4</b>
<i>Using Our Code</i> .....	4
<i>Other Company Policies and Procedures</i> .....	4
Who Must Follow Our Code .....	4
Our Commitment to Integrity .....	5
<i>Employee Responsibilities</i> .....	5
Making Ethical Business Decisions .....	6
Additional Responsibilities for Supervisors/Managers .....	6
Violations of Our Code .....	7
<i>At-Will Employment</i> .....	7
Asking Questions and Reporting Concerns .....	8
Retaliation Will Not Be Tolerated .....	9
<b>WE DO THE RIGHT THING FOR OUR CUSTOMERS AND THIRD PARTIES .....</b>	<b>10</b>
We Comply with Government Procurement Law.....	10
We Comply with Anti-Bribery Laws.....	11
We Work on Government Contracts with Integrity .....	12
<i>Supplier Selection</i> .....	13
We Communicate Clearly .....	14
<i>Social Media and Networking</i> .....	14
We Deal Fairly .....	15
We Comply with Competition and Antitrust Laws .....	15
We Comply with U.S. Anti-Boycott Laws.....	16
We Comply with U.S. Export Controls.....	16
We Comply with Free Trade Agreements .....	17
We Comply with U.S. Import Regulations .....	17
We Comply with Anti-Money Laundering and Anti-Terrorism Laws .....	17
<b>WE DO THE RIGHT THING FOR OUR COMPANY .....</b>	<b>18</b>
We Avoid Conflicts of Interest.....	18
<i>Financial Interests in Other Organizations</i> .....	18
<i>Outside Business Activities</i> .....	19
<i>Corporate Opportunities</i> .....	19
<i>Hiring Family Members</i> .....	20
<i>Hiring from Business Affiliates</i> .....	20
Gifts, Entertainment and Other Personal Benefits .....	22





We Safeguard Company Information and Property .....23  
    *Physical Assets and Property* ..... 23  
    *Intellectual Property and Proprietary Information* .....23  
    *Post-Employment Responsibilities*.....24  
    *Company Information Technologies*.....24  
    *Sensitive Government Material*.....25  
We Respect the Information and Property of Others .....25

**WE DO THE RIGHT THING FOR EACH OTHER .....26**

We Respect the Individual and Diversity .....26  
We Do Not Tolerate Discrimination or Harassment .....27  
We Provide a Safe, Healthy Work Environment .....28  
    *Workplace Violence* .....29  
    *Drugs and Alcohol* .....29  
We Respect Each Other's Privacy .....29

**WE DO THE RIGHT THING FOR OUR SHAREHOLDERS .....30**

We Do Not Engage in Insider Trading .....30  
We Create Accurate Corporate Records .....31  
    *Cooperation with Investigations* .....33

**WE DO THE RIGHT THING FOR OUR COMMUNITIES .....34**

Serving Our Communities.....34  
Political Activities in the Workplace .....35  
    *Elbit Systems of America PAC*.....35  
We Respect Human Rights.....36  
We Protect the Environment.....36

Waivers of Our Code .....37

**WE DO WHAT WE SAY...  
...AND WE HONOR OUR COMMITMENTS.**

# INTRODUCTION

*Supporting our troops.  
Supporting our freedom.*

Welcome to the updated Elbit Systems of America's Code of Business Ethics and Conduct ("Code").

## USING OUR CODE

Our Code is designed to be a helpful resource for each of us in making sound, ethical business decisions. Conducting our business honestly, ethically and properly is critical to Elbit Systems of America's continued success and growth. As such, we have updated this Code to further our commitment to ethical business conduct in all that we do.

In addition to our Code, Elbit Systems of America (the "Company") has policies and procedures in order to help us maintain our good reputation and conduct our business ethically and in compliance with all applicable laws and regulations. Our Code and our policies are intended to help foster proper conduct by Elbit Systems of America employees and promote a workplace culture that complies with not only the letter, but also the spirit of all applicable governmental laws, rules and regulations.

While our Code familiarizes us with the standards we must follow, no one document can cover all situations. If, despite our intent that the Code be fully compliant with legal requirements,

a law conflicts with our Code, we must comply with the law. On the other hand, our ethics policy—as expressed in this Code and supplemented in other procedures—takes precedence in the event of a conflict with a particular local custom or practice.

## OTHER COMPANY POLICIES AND PROCEDURES

Our Code is consistent with and refers to certain key corporate policies posted on the Elbit Systems of America Portal. If you need further guidance in a particular area, these policies provide greater detail. In some instances, our policies may provide additional guidance not covered by our Code.

## WHO MUST FOLLOW OUR CODE

Our Code applies equally to all employees, officers and directors, including the President and Chief Executive Officer, the Chief Financial Officer, and any other senior officers of each Elbit Systems of America company and site. In addition, non-employee members of our Board of Directors must comply with all applicable provisions of this Code.





**SUPPLIERS, CONSULTANTS, CONTRACTORS AND REPRESENTATIVES** We will make every effort to inform these third parties of their responsibility to uphold our Code when conducting business with the Company. In addition, we will only seek to do business with third parties who have a similar commitment to integrity.

## REMEMBER THESE RULES:

- Know the applicable legal and Company standards.
- Follow these standards—always.
- If you are ever unsure what is the right thing to do—ask.

**FOR MORE INFORMATION**, please refer to our Supplier Code of Conduct, located on the Portal.

## OUR COMMITMENT TO INTEGRITY

Our Values, accountability and culture of collaboration set us apart from our competitors. We honor our commitments by complying with our customers' requirements, applicable external standards, laws and regulations and our organization's policies. We are committed to operating according to the highest ethical standards and leading with integrity.

## EMPLOYEE RESPONSIBILITIES

Each member of our team is expected to:

- Be familiar with our Code and other related Elbit Systems of America procedures.
- Comply with applicable laws and regulations governing our business conduct.
- Act with honesty, fairness and trust in all Company activities and relationships.
- Avoid all conflicts of interest between work and personal affairs.
- Foster an atmosphere in which fair employment practices extend to every member of our Company and community.
- Strive to create a safe workplace and to protect our environment.
- Never try to go around our Code or policies by any means. This includes retaining a third party to do what we ourselves would not.

In addition, we are all expected to:

- Accept personal responsibility for our own conduct and compliance with all provisions of our Code, or applicable policy, and for properly reporting known or suspected violations.
- Never order, request or even influence anyone to violate our Code or the law. Any attempt to induce another person or group to violate our Code, whether successful or not, is a violation of this Code and, in some cases, the law.

## MAKING ETHICAL BUSINESS DECISIONS

Our Code is a statement of basic principles and standards, and does not include specific rules that apply to every situation. In some situations, it may be difficult to know the proper course of action or you may find there is no directly applicable policy, practice or instruction. It is important to consider the following when you encounter a difficult situation:

- Determine if you know all the facts and identify exactly what it is that concerns you.
- Discuss the concern with your supervisor/manager, Ethics Officer, Legal Department or make a report through the Ethics Hotline.
- Seek guidance before taking any action that you believe may be, or may appear to be, unethical, illegal or improper.

### ONE MORE THING ...

We value your feedback. If you have suggestions for ways to enhance our Code, policies or our resources to better address a particular issue you have encountered, bring them forward. Promoting a more ethical organization is a responsibility we all share.

## ADDITIONAL RESPONSIBILITIES FOR SUPERVISORS/MANAGERS

Supervisors/managers have an even greater responsibility to uphold our Code and Company Values. If you are a supervisor or a manager, you must:

- Lead by example.
- Always act ethically and with integrity.
- Never retaliate against anyone for making a good faith report of known or suspected misconduct.
- Ensure that those who report to you understand and comply with our Code.
- Make yourself available for any questions or concerns about our Code and Company policies.
- Foster and support a culture where ethical conduct is valued and exemplified by all employees.

**FOR MORE INFORMATION**, please refer to our Business Ethics & Conduct Policy located on the Portal.

## THE WARNING SIGNS OF A QUESTIONABLE DECISION

When decisions are being made, listen for the following comments, they could signal that the decision is inconsistent with Our Values, ethics and compliance:

- "Don't worry about it. No one will find out."
- "We need to keep this decision to ourselves—no one else needs to know."
- "That's just how we do business here."
- "Everyone else is doing it this way."





## WHAT IF...?

**Q** I'm a supervisor. If I observe misconduct in an area not under my supervision, am I still required to report the issue? I'd rather not get involved.

**A** You are chiefly responsible for personnel under your supervision, but all leaders are required to report any misconduct they become aware of and take action. The best approach is to talk first with the supervisor who oversees the area where the problem is occurring, but if this doesn't work, or isn't feasible, you should use any of the other resources listed in this Code. And remember: If there is misconduct at Elbit Systems of America, it is everyone's problem.

## VIOLATIONS OF OUR CODE

Violation of any of the standards contained in our Code, or in any other Elbit Systems of America policy, practice or instruction, will result in disciplinary action, up to and including termination.

## AT-WILL EMPLOYMENT

This Code is not an employment contract in any form, although adherence to these standards is a condition of employment. It does not give any individual rights of any kind. We may amend or alter this Code and any Elbit Systems of America policy at any time.

**FOR MORE INFORMATION**, please refer to our Employment-at-Will Policy in the Employee Handbook, located on the Portal.

## ASKING QUESTIONS AND REPORTING CONCERNS

We have a responsibility to our Company and to each other in reporting illegal or unethical conduct. Doing so helps us meet the standards set by our Code and maintain the trust our various stakeholders place in us. As such, you should promptly report violations of our Code, Company policy, applicable laws or regulations.

If you need to make a report of actual or suspected misconduct, the following resources are available to you:

- Your supervisor/manager
- Ethics Officer
- Human Resources
- Legal Department
- 24-hour Ethics Hotline 866.858.4327

You are encouraged to talk to your supervisor/manager or other appropriate personnel when in doubt about the best course of action. All reports will be promptly investigated and, if found to be accurate, acted upon in a timely manner. You may be asked to participate in internal investigations of misconduct and are expected to comply with these investigations.

While you are encouraged to identify yourself when making a report, you may do so anonymously. However, it is important to note that it will be more difficult to investigate anonymous reports thoroughly. All information received through these reports will remain confidential to the extent permitted by law.

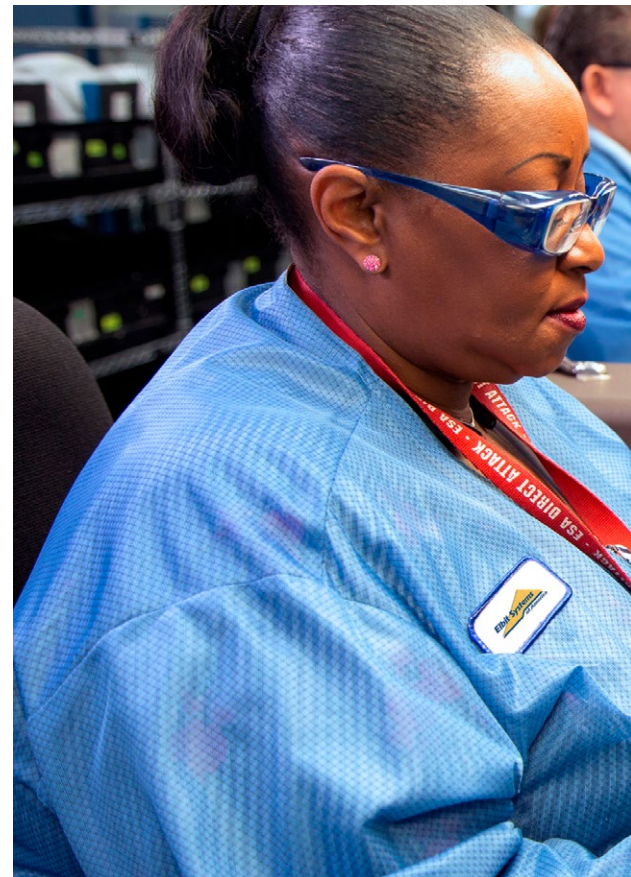


### WHAT IF...?

**Q** I'm worried that someone might use the Ethics Hotline and falsely accuse me of wrongdoing. What happens then?

**A** Experience has shown that the Ethics Hotline is rarely used for malicious purposes, but it is important to know that we will follow up on calls and anyone who uses it in bad faith to spread falsehoods or threaten others, or with the intent to unjustly damage another person's reputation, will be subject to disciplinary action up to and including termination.

**FOR MORE INFORMATION**, please refer to our Reporting Violations Policy located on the Portal.





## RETALIATION WILL NOT BE TOLERATED

Our Company provides us the necessary tools through which we may report suspected violations of our Code or policies. Elbit Systems of America does not tolerate retaliatory acts against anyone who makes a good faith report of suspected misconduct. Reporting in "good faith" means that the information you have provided is, to the best of your knowledge, complete and accurate and you believe it to be true.

**Never retaliate or threaten to retaliate against anyone for refusing to violate our Code, or for reporting in good faith a known or suspected violation. Retaliatory actions violate our Code, Company policy and, in some cases, the law.**



### WHAT IF...?

**Q** Three months ago, I called the Ethics Hotline anonymously. I was concerned that my supervisor was giving preferential treatment to some employees at the expense of others. It was investigated and I understand some action was taken.

Since then my boss and others have stopped speaking to me and copying me on important communications, and I am worried this will affect my performance. I feel that my colleagues know I made the report and are retaliating. Is it retaliation? What should I do?

**A** This could be a case of retaliation. Contact Human Resources or use any of the other resources listed in the Code. A thorough investigation will take place to find out what has led to your colleagues' behavior. If the investigation determines that they are retaliating because of your report, appropriate action will be taken.



# WE DO THE RIGHT THING FOR OUR CUSTOMERS AND THIRD PARTIES

*We stay attuned to our customers' needs.*

## WE COMPLY WITH GOVERNMENT PROCUREMENT LAW

When working with government entities in any country, we have an obligation to know, understand and abide by the laws and regulations that apply to our work, including the U.S. Federal Acquisition Regulation ("FAR"). The U.S. government is our most significant customer, so it is crucial that we know and comply with the laws and regulations relating to



doing business with the government. These laws are complex and may vary depending on the specific circumstances. However, we must follow these laws carefully to ensure full compliance and protect our Company's reputation.

In any government procurement process:

- We will not improperly obtain, use or disclose government source selection or proprietary information, such as sealed bid prices, technical evaluation plans, competitive range determinations or ranking of proposals.
- We will not ask officials to disclose the proprietary information of our competitors.
- We will not ask for source selection material—the material the government has developed to evaluate competing bids.
- We will take precautions not to share any of our own proprietary information with government officials who are not on the government's list of approved persons.



## WHAT IF...?

**Q** The technical manager working for a government-controlled organization wants to see our latest technology. They are paying for their own flights and hotel accommodations, but would like us to provide administrative support and local transportation. They also expect us to entertain them in the evening. Is this appropriate?

**A** The first thing to note is that since this involves an employee of a government-controlled organization, the technical manager is a government representative. You can support visits of government and state company delegations to our offices and sites, but only if all items are approved in advance by the Legal Department. It is also permissible to promote, demonstrate and explain the benefits of our products or technology to government employees who are decision-makers or potential partners, but you must not try to influence them by offering personal benefits. Discuss the situation with the Legal Department before taking any further action.

**FOR MORE INFORMATION**, please refer to our Prohibition of Fraud, Bribery and Corruption Policy located on the Portal.

## WE COMPLY WITH ANTI-BRIBERY LAWS

Doing business with our customers the right way means we must never offer, give, ask for or take any form of bribe or kickback.

We must compete solely on the merits of our products and services. We never try to influence a government customer's decision to purchase from our Company by offering gifts, meals or entertainment. Government agencies have regulations prohibiting their employees' acceptance of items of value from contractors or suppliers.

## IMPORTANT DEFINITIONS

- A "bribe" is anything of value—including money, gifts, entertainment or favors—that could be seen as an attempt to receive favorable treatment.
- A "kickback" is the return of a sum paid or due to be paid as a reward for making or fostering business arrangements.
- "Favorable treatment" can often appear innocent, such as paying for a customer's attendance at or participation in a trade show. However, favorable treatment is illegal when offered in exchange for a gift, entertainment or favor.
- A "government official" includes anyone who works for or is an agent of a government-owned or government-controlled entity. It also includes officials of political parties and candidates for political offices.



We do not pay facilitation payments. Facilitation or “grease” payments are typically small payments to a low-level government official that are intended to encourage the official to perform his responsibilities. If a facilitation payment is requested, report the request to the Legal Department.

Our Company carefully follows these regulations and policies, including when dealing with third-party marketing representatives, and we have zero tolerance for corruption.



### WHAT IF...?

**Q** A representative of one of our suppliers claims they can help us win a contract with a customer. I think they are planning to offer lavish travel and entertainment to one of the customer’s vice presidents. Should I do anything about this?

**A** Yes. Anytime you are unsure about the appropriateness of travel and entertainment in relation to winning business, you should speak up. Remember, a bribe need not be cash, it can be anything of value that is given to influence the behavior of someone in order to obtain business or commercial advantage. Contact the Legal Department immediately so that this matter can be properly assessed.

**FOR MORE INFORMATION**, please refer to our Fraud, Bribery and Corruption Policy located on the Portal.

## WE WORK ON GOVERNMENT CONTRACTS WITH INTEGRITY

There are strict rules when working on government contracts. This means, in part, that we must be clear and accurate in every aspect of our billing and pricing on government programs and comply with all applicable laws, rules and regulations. Our prices reflect all applicable costs to design and produce our products, our level of effort, market conditions and other relevant factors.

When engaged in billing and pricing, we have the following responsibilities:

- Be accurate in pricing
- Bill appropriate projects
- Do not split invoices to hide costs or avoid payment procedures
- Ensure bills are accurate, timely and complete
- Overpayments will be returned promptly upon discovery

We must comply with the terms of our contracts and deliver goods and services as required. We may never substitute material, change testing or alter quality control requirements except when allowed in accordance with applicable procedures. In addition, we may never certify that something has been tested when it has not been. To comply with the terms of our contracts, we share the following responsibilities:

- Document how Elbit Systems of America has met our contractual obligations
- Do not make substitutions without following proper procedures
- Perform all tests in accordance with the terms of the contract

At Elbit Systems of America, we take care in avoiding mischarging of costs, including cross-charging of costs between contracts, charging direct costs as indirect costs or any other similar mischarging. When working as a prime contractor or subcontractor, we must be particularly diligent in recording our time, correctly indicating hours worked and the projects to which time is charged. If your costs are allocated to government contracts or subcontracts, you must identify any expenses that are not allowable, paying special attention to such categories as alcohol, business meals and entertainment.

In addition, we seek all marketing data properly and legally, and we will not obtain or use any government classified or sensitive information from any source where there is a reason to believe that the release of the information is unauthorized. If you are in doubt, contact the Legal Department.

Further, we will not use any government-owned equipment outside the terms of its contractual authorized use.

**FOR MORE INFORMATION**, please refer to our U.S. Government Contracting Policy located on the Portal.

## SUPPLIER SELECTION

Our Company will only enter into representation or supplier agreements with companies that have a record of, and commitment to, integrity. We must make every effort to ensure that suppliers, consultants, independent contractors and representatives are aware of our Code and other Company policies, as well as any applicable law or regulation.



### WHAT IF...?



**Q** I'm a manager and I'm not sure what level of cooperation is expected of me when there's a government inspection or investigation. What should I do?

**A** While protecting our legitimate interests, you should always be open and honest about our business. Be courteous and truthful with government officials conducting an inquiry or inspection. The information you provide must always be truthful and accurate. Notify and seek guidance from the Legal Department before responding to any non-routine request for information.



## WE COMMUNICATE CLEARLY

Our reputation is one of our most important assets. It is our responsibility to ensure that Elbit Systems of America speaks with one consistent, accurate voice when making statements about our products and services to the public.

Our Company policy is to avoid any misstatement of fact or misleading impression in any of our advertising, literature, exhibits or other public statements. All statements made in support of our products and services should be accurate and supportable.

We must always communicate clearly and precisely, either orally or in writing, so that our customers, suppliers and other business associates understand the terms of our contracts, including performance criteria, costs and schedules.

It also should be remembered that, as a subsidiary of a company whose shares are publicly traded on stock exchanges, all Company press releases and similar public announcements must be approved in advance in accordance with our Media and Public Communications Policy.

**FOR MORE INFORMATION**, please refer to our Media and Public Communications Policy located on the Portal.

## SOCIAL MEDIA AND NETWORKING

Social media and online networking tools offer us additional opportunities to share information, ideas and perspectives. Elbit Systems of America restricts access to social networking sites



using Company IT resources; however, if you access these sites for personal use, take care to avoid releasing any proprietary Company information.

- Never disparage or defame our Company or any of our customers, coworkers or any third parties doing business on our behalf to include suppliers, independent contractors or agents working on our behalf.
- Make sure that any personal views you express cannot be attributed to Elbit Systems of America in any way.
- As a contractor that supports our national defense, employees should be particularly sensitive to any activity that may compromise computer resources through cyberattacks.

**FOR MORE INFORMATION**, please refer to our E-mail and Internet Use Policy and our Social Media Acceptable Use Policy located on the Portal.



## WE DEAL FAIRLY

Doing business the right way means that we always deal with our suppliers, competitors, employees and other business partners in an ethical manner. We may never take unfair advantage of anyone through manipulation, concealment, and abuse of privileged or proprietary information, misrepresentations or any other unethical practice.

## WE COMPLY WITH COMPETITION AND ANTITRUST LAWS

We compete aggressively, but fairly and within the law. As such, we must understand and comply with the domestic and international competition laws (sometimes called “antitrust laws”) of all countries where we do business. These laws prohibit any formal or informal understanding, agreement, plan or scheme among competitors that unfairly restricts competition. Such laws are important to the free enterprise system because they allow our customers to receive quality products and services at reasonable prices.

In upholding these laws, any discussion—directly or indirectly through a third party—of prices, terms and conditions of sale, costs, inventories, marketing and product plans, market surveys and studies, production plans and capabilities must be done in strict accordance with applicable law.

Violations of competition laws are severe and can result in civil or criminal penalties for the individuals involved, as well as our Company.



### WHAT IF...?

**Q** We recently hired a new employee who previously worked for one of our suppliers. She says she has confidential information about pricing from her previous job that can be useful to us. Is it OK for me to look at the information and use it to our advantage?

**A** No, it is not. We need to respect the confidential information of our business partners, third parties and suppliers just as we expect them to respect our confidential information. Explain to the new employee that we cannot use the information.

**Q** I will be attending a trade association meeting, and I’m worried that my discussions may violate antitrust laws. I’m not sure what I can and cannot discuss. What should I do?

**A** You are right to be concerned, but the situation can be managed. Trade association meetings are an excellent way to stay informed and connected, but since they bring together competitors, they can lead to antitrust violations. Before the meeting, discuss your concerns with the Legal Department. You can review the agenda and discuss who might be there and what topics may come up. When you are at the meeting, if a discussion begins that may involve inappropriate topics, stop the conversation, break away and promptly inform the Legal Department.

FOR MORE INFORMATION, please refer to our Antitrust Law Policy located on the Portal.

## WE COMPLY WITH U.S. ANTI-BOYCOTT LAWS

U.S. law prohibits U.S. citizens from participating in other nations' economic boycotts or embargoes that are not permitted by the United States. It is our policy to fully comply with U.S. law. In doing so, it is our responsibility to promptly report any request to cooperate with a foreign boycott.

Requests to cooperate in a foreign boycott can arise in many contexts, including, but not limited to transaction documents, shipping documents, side letters and quotations. All requests to cooperate with a foreign boycott should be reported immediately to the Legal Department.

**FOR MORE INFORMATION**, please refer to our Anti-Boycott Policy located on the Portal.

### PROHIBITED CONDUCT UNDER U.S. ANTI-BOYCOTT LAWS INCLUDES:

- Any agreement to refuse or actual refusal to do business with or in Israel or with companies that have been blacklisted for doing business with Israel.
- Implementation of letters of credit containing prohibited boycott terms or conditions.
- Any agreement to furnish information about business relationships with Israel or companies that have been blacklisted.
- Any agreement to furnish information about the race, religion, sex or national origin of another person.
- Any agreement that discriminates against other persons based on race, religion, sex, national origin or nationality.

## WE COMPLY WITH U.S. EXPORT CONTROLS

We comply with all export control and international economic sanctions laws and regulations of the United States. These laws and regulations prohibit export by our Company, including the parent and any subsidiary of Elbit Systems of America, of certain technologies without an approved U.S. export license. In addition, these laws and regulations prohibit our Company from allowing the diversion or re-exportation of properly exported products from one destination to a prohibited destination.

The requirements of these laws are complex and sometimes difficult to understand. Any questions concerning the trade controls or economic sanctions should be addressed to the Legal Department or the Trade Compliance Department.

**FOR MORE INFORMATION**, please refer to our U.S. Export Controls and International Economic Sanctions Policy and the Company's Export Compliance Manual located on the Portal.

## WE COMPLY WITH FREE TRADE AGREEMENTS

International free trade agreements ("FTA") are agreements between countries that stimulate trade by reducing or eliminating customs duties and taxes on products entering the countries.

It is Elbit Systems of America's policy to use free trade agreements when possible, but only if all legal requirements are met.

**FOR MORE INFORMATION**, please contact our Legal Department or Trade Compliance Department.

## WE COMPLY WITH U.S. IMPORT REGULATIONS

The United States has laws that regulate the importation of goods, services and technologies. Among other things, these laws create revenue for the U.S. government by assessing and collecting duties, taxes and fees on imported products.

It is Elbit Systems of America's policy to comply with all import requirements. No employee may take any action to improperly evade duties, or other applicable requirements regarding the importation of goods.

**FOR MORE INFORMATION**, please contact our Legal Department or Trade Compliance Department.

## WE COMPLY WITH ANTI-MONEY LAUNDERING AND ANTI-TERRORISM LAWS

We are committed to complying with both the letter and spirit of anti-money laundering and anti-terrorism laws, including the U.S. Patriot Act.



### WHAT IF...?

**Q** A supplier has asked that we send payments to a new address outside the country of business. I am suspicious that there might be something illegal or inappropriate going on.

**A** You are right to be suspicious. This may be an effort to launder money or to otherwise avoid legal requirements. You should contact the Legal Department without delay and in the meantime, do not change the address until the Legal Department has told you otherwise. If possible, do not have any further discussions with the supplier about the request.

**FOR MORE INFORMATION**, please refer to our Patriot Act and Executive Order 13224 Policy located on the Portal.



# WE DO THE RIGHT THING FOR OUR COMPANY

*We perform high-quality work knowing that it saves lives.*

## WE AVOID CONFLICTS OF INTEREST

As part of our commitment to doing the right thing, we must never allow our personal interests to interfere with the Company's. Conflicts of interest can occur when we take actions or have interests that interfere, or appear to interfere, with our ability to perform our work objectively. Conflicts of interest may also occur if we, or a member of our family, receive an improper personal benefit because of our position or influence within the Company.

If you know or suspect you may have a conflict of interest, you should report it promptly to your supervisor/manager, Ethics Officer, Legal Department or make a report through the Ethics Hotline. Disclosure of possible conflicts will provide us with an opportunity to mitigate or manage the situation.

**Following are some common examples of situations in which conflicts of interest may arise.**

## FINANCIAL INTERESTS IN OTHER ORGANIZATIONS

A conflict of interest may occur if we own an interest in another organization that has a business relationship with, or is a direct competitor of, Elbit Systems of America. In these cases, our financial interest would likely create a conflict of interest if the amount we own calls into question our ability to do work objectively on Elbit Systems of America's behalf.

As a rule, an investment by an employee with a company with which we have a relationship is generally acceptable if it meets all of the following:

- Is in publicly traded shares or other types of securities,
- Represents less than 1% of the outstanding equity of the organization in question, and
- Represents less than 5% of your net worth

Outside financial interests can be complex and conflicts of interest may depend on the situation. As such, it may not always be clear which interests are proper, and which might create a conflict. If you have any questions about whether your investments create a conflict of interest, you should contact the Legal Department.

## OUTSIDE BUSINESS ACTIVITIES

In certain cases it may be permissible to engage in outside employment. However, if such employment is permissible, it must not affect your ability to perform your job at Elbit Systems of America. In all cases, you must not conduct personal business using Company time or resources.

In addition, you cannot be employed by a customer, supplier, competitor or other business partner, including end users of our systems. Doing so would create a conflict of interest and you should report it to the Legal Department immediately.

If you are involved in trade associations, professional societies, charitable and similar organizations, know that these involvements normally do not create a conflict of interest. However, if you have any concerns or become aware of a conflict between the Company and the organization, you should contact your supervisor/manager, Ethics Officer, Legal Department or make a report through our Ethics Hotline.

## CORPORATE OPPORTUNITIES

Through your work, you may become aware of business opportunities that you want to personally pursue. It is important to keep in mind that these opportunities belong first and foremost to Elbit Systems of America and should not be used for personal gain. In addition, any opportunity that is discovered through the use of Company property, information or position may not be acted upon unless advance approval is given. Under no circumstances can you compete with our Company or direct others to do so.





## HIRING FAMILY MEMBERS

Elbit Systems of America strives to provide a workplace that demonstrates fairness to all employees. Therefore, we prohibit the hiring, promotion or transfer of family members into either direct or indirect reporting relationships. In addition, you may not be part of the same administrative work group or team as a member of your family. Family members include parents, spouses, children and siblings, whether natural, adopted, step or in-law.

## HIRING FROM BUSINESS AFFILIATES

Doing the right thing means we make employment decisions based solely on merit. Hiring persons previously employed by organizations that have a business affiliation with our Company may create a conflict of interest. These organizations include independent auditors or other service providers, subcontractors, customers, end users, government regulators and competitors. The hiring of any former employees of these organizations should be reviewed in advance with the Human Resources and Legal Departments in order to avoid a conflict of interest situation. Any action that appears to conflict with this may affect our reputation and violate our Code.





## WHAT IF...?

**Q** I have been dating another Elbit Systems of America employee for a while, but now he is being transferred to my business unit. Is this a problem?

**A** It may not be a problem, but it depends on the business relationship that will exist between the two of you if the transfer occurs. You need to review the situation with your manager or HR to determine if additional steps need to be taken.

**Q** I just joined the Company after working for many years at a competitor. During my prior employment, I accumulated what for me is a significant number of shares of their stock. Is this a conflict? What do I need to do?

**A** It is likely that this is not a problem, but you should discuss the situation with your manager. The two criteria that we use to determine if there is a conflict are: if your investments are less than 1% of the outstanding shares of the public company and if you earn less than 5% of your net worth from the investment. Other factors may also apply, so it is important that you discuss the specifics of your situation.

IF YOU THINK A SITUATION MIGHT CREATE A CONFLICT OF INTEREST,



## ASK YOURSELF THE FOLLOWING QUESTIONS:

- Would other employees or an outsider think it might affect how I do my job?
- Could it affect any decision I might make at Elbit Systems of America?
- Do I, or a member of my family, stand to gain anything from my relationship with the third party doing business with the Company?
- Do I feel under any obligation due to my relationship with the third party doing business with Elbit Systems of America?
- Would I be embarrassed if anyone inside or outside the Company knew about the situation?
- How might the situation look to a customer or supplier? Would they question whether they have been treated fairly?

**If you answer “yes” to any of the above questions, you may have a conflict of interest and should disclose the matter to your supervisor/manager, Ethics Officer or Legal Department.**

**FOR MORE INFORMATION**, please refer to our Conflicts of Interest Policy and our Employee Handbook located on the Portal.

## GIFTS, ENTERTAINMENT AND OTHER PERSONAL BENEFITS

Entertaining our customers, suppliers and other business partners is a common way of fostering good business relationships. However, gifts, entertainment or other benefits may only be offered or accepted in accordance with applicable Company policy.



### WHEN CONSIDERING WHETHER A GIFT OR ENTERTAINMENT IS APPROPRIATE:



Ask yourself the following questions when deciding whether to offer or accept gifts or entertainment:

- Would the gift or entertainment appear to influence the recipient's objectivity?
- Would the gift or entertainment be considered unique, lavish or extraordinary?
- Would you be embarrassed if the gift or entertainment was made public, for example, in the local newspaper, or if senior executives of the customer learned about it?
- Is the gift or entertainment prohibited under the customer's code of conduct?

**If you answer "yes" or "maybe" to any of these questions, consult your supervisor/manager and the Legal Department before proceeding.**

**An area of particular focus is the prohibition on bribery of governmental officials. Please refer to the "We Comply with Anti-Bribery Laws" section of our Code, as well as our Fraud, Bribery and Corruption Policy located on the Portal.**



## WHAT IF...?

**Q** A supplier offered me two tickets to a Broadway show. They cannot come with me themselves, but have told me to take a friend. The tickets are probably expensive. May I accept them?

**A** Because the supplier is not accompanying you, the tickets are not considered entertainment but are a gift. You will need to get approval from your manager who will provide guidance in line with our gift policies.

**Q** I received a gift from a potential supplier who recently submitted a bid to work on a project. I know I can't accept it, but what should I do?

**A** The best approach is to return the gift and politely explain our policy. If a bid is open we cannot accept any gifts of any value. If the bidding process is closed and the gift is of nominal value and perishable such as flowers or cookies, place it in a break room where it can be enjoyed by everyone. Reach out to the supplier to explain our policy and also report the matter to your supervisor.

**FOR MORE INFORMATION**, please refer to our Conflicts of Interest Policy and Gifts & Entertainment Policy located on the Portal. It is important to note that stricter rules may apply to the offering of gifts, entertainment or favors to a U.S. or foreign government official. Please refer to our U.S. Government Contracting Policy located on the Portal.

## WE SAFEGUARD COMPANY INFORMATION AND PROPERTY

### PHYSICAL ASSETS AND PROPERTY

Company assets are a vital component to our continued success. Therefore, we share a responsibility to protect Elbit Systems of America assets from theft, carelessness, waste and misuse. Company assets are provided for legitimate business purposes only.

### INTELLECTUAL PROPERTY AND PROPRIETARY INFORMATION

Information is one of our most valued assets. It is important that we safeguard the Company's intangible assets, such as proprietary information, intellectual property ("IP") and innovative ideas.

IP rights, including patents, trademarks, copyrights, trade secrets and know-how must be planned for and managed with the same degree of care as any other valuable asset. New concepts and ideas will be identified for evaluation and protection, as appropriate, to support the long-term success of our Company. Any intellectual property created while employed by Elbit Systems of America belongs to the Company. This is true even after our employment ends.



## OUR INTELLECTUAL PROPERTY INCLUDES:

Trade secrets, patents, trademarks and copyrights. It also includes business, marketing, financial, human resources, technical and administrative information not properly released to the public.

Unauthorized use or distribution of this information violates our Code and Company policy. It may also violate the law and result in civil or even criminal penalties.

## POST-EMPLOYMENT RESPONSIBILITIES

We share a continuing obligation to protect our Company's non-public, classified, proprietary information and assets, even after we leave Elbit Systems of America for any reason, including retirement. This means, in part, that you have a post-employment obligation to safeguard any proprietary or "classified" information to which you had access during your employment. In addition, never use proprietary or business-sensitive information obtained in the course of your employment for personal gain.

## WHAT IS CONSIDERED "HARMFUL DISCLOSURE" OF PROPRIETARY INFORMATION?

Disclosing a proposed executive or organizational change can hurt team morale and interfere with our Company plans.

Disclosing an unannounced customer negotiation can hurt us by giving competitors an opportunity to interfere and time, potentially, to match our solution.

Inappropriate disclosures may also violate agreements with our customers or other business partners and, because our Company is a subsidiary of a publicly traded company, such disclosures may also cause violations of securities laws. If you have any concerns about whether or not disclosure of certain information would be considered harmful, contact your supervisor/manager, Ethics Officer or Legal Department.

## COMPANY INFORMATION TECHNOLOGIES

We are each responsible for using Company Information Technology ("IT") resources appropriately at all times. This means that we must take care to compose all of our electronic communications using the same care as we do in other written correspondence.

Limited, appropriate personal use of computer networks and communication channels is allowed. However, this use must not interfere with job duties. In addition, when using Company IT resources you should have no expectation of privacy. Keep in mind that all communications using Company IT resources may be monitored at any time.

Protecting IT resources also means we must take necessary actions to safeguard passwords and identification codes to prevent unauthorized access to our information systems. Never share your login information with anyone who does not have a business need to know it or additional information.



## WHAT IF...?

**Q** I frequently work with confidential information. Am I allowed to store this information on my laptop or a memory stick? In particular, can I take my laptop out of the office?

**A** You may only store confidential information on a portable computer device or storage device such as a laptop or memory stick if the hard disk of the device is fully encrypted. If you are working away from the office you must follow the requirements specified in our IT and Security policies to ensure that you apply the correct level of protection. In some cases you must seek permission from your manager or the owner of the information before you take it out of the office.

**FOR MORE INFORMATION**, please refer to our Use and Care of Company Resources/Assets Policy; Protection of Sensitive Information Policy, as well as, our E-mail and Internet Use Policy on the Portal or contact the IT Department.

## SENSITIVE GOVERNMENT MATERIAL

From time to time, we will accept or retain sensitive government materials. When we do, we must maintain those materials in accordance with applicable laws and our government contracts. In the United States, U.S. government classified material may be received and maintained only in authorized facilities. Access to such data must be safeguarded in accordance with government regulations and Elbit Systems of America policies.

**FOR MORE INFORMATION**, please refer to our Protection of Sensitive Information Policy located on the Portal or contact our Security Department.

## WE RESPECT THE INFORMATION AND PROPERTY OF OTHERS

Customers and third parties entrust us with their assets and information. It is our responsibility to safeguard both physical and intellectual property of others. In addition, we must know and comply with all regulations or contractual requirements governing the use of such property. We will obtain the physical and intellectual property of our competitors only through lawful means—never through misrepresentation or deceit.

If you have access to information, material, products, intellectual property, or proprietary or confidential information of anyone, including suppliers, customers, business partners or competitors, you have a duty to use it ethically and lawfully. In addition, you may not copy or distribute copyrighted material—software, database files, documentation or articles—including by using our computer or email systems without a proper license to do so.

# WE DO THE RIGHT THING FOR EACH OTHER

*We listen for and value diversity in thought and approach.*

## WE RESPECT THE INDIVIDUAL AND DIVERSITY

We respect the dignity of each individual and the importance of creating a comfortable and inclusive work environment. It is, therefore, important that each of us respect each other in the workplace.

To help foster this environment, you are encouraged to engage in open, timely communications that helps achieve organizational goals, share information, increase understanding, participate in the decision-making process, enhance pride in the organization and provide recognition for work-related successes.

The Company provides a workplace conducive to conducting business, allowing us all to excel, be creative, take initiative, seek new ways to solve problems, generate opportunities and be accountable for our actions. We encourage teamwork to leverage the diverse talents and expertise of our people through effective collaboration and cooperation. We promote self-development through training that broadens work-related skills and values diversity, different perspectives and ideas.



### WHAT IF...?

**Q** Can I make a judgment call about who to interview given what I know about the job requirements and the candidate's family situation? I believe that a vacancy in my team would not be suitable for a single parent, as it involves a lot of travel. This is not about prejudice, but practicality. Am I obliged to interview single parent candidates out of courtesy?

**A** You are obliged to interview all candidates whose qualifications meet the requirements of the job—not on the basis of personal opinion or judgments about a candidate's personal life. Making assumptions like this violates our standards and may even be against the law. Just as important, failing to interview suitably qualified candidates risks missing out on appointing the best person for the job.



## WE DO NOT TOLERATE DISCRIMINATION OR HARASSMENT

As part of our commitment to doing the right thing, we do not tolerate discrimination or harassment of any sort in the workplace. This means, in part, that we do not make employment-related decisions based on gender, race, ethnicity, sexual orientation, physical or mental disability, age, pregnancy, religion, veteran status, national origin or any other legally protected status.

### HARASSMENT

We prohibit harassment of our employees by other employees or nonemployees. Harassment can be both sexual and non-sexual in nature and includes any demeaning, insulting, embarrassing or intimidating behavior directed at any individual related to that person's legally protected status.

Elbit Systems of America specifically bans unwelcome sexual advances or physical contact, sexually oriented gestures and statements, and the display or circulation of sexually oriented pictures, cartoons, jokes or other materials. Such actions also could constitute violations of law.

We will not tolerate retaliation against anyone who rejects, protests or complains about discrimination or harassment.

To report discrimination or harassment, contact your supervisor/manager, Human Resources, Ethics Officer, or the Legal Department or make a report through our Ethics Hotline.



### WHAT IF...?

**Q My supervisor often loses his temper and yells whenever he thinks we've done something wrong. Is that harassment?**

**A** Whether it constitutes harassment or not, the situation creates a poor work environment. His behavior must be addressed because it undermines the commitment we've made to maintain a respectful workplace. Talk with your next-level supervisor or Human Resources.

**Q While attending a conference, a coworker repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't at work and it was "after hours," so I wasn't sure what I should do. What should I have done?**

**A** This type of conduct is not acceptable, neither during working hours nor any work-related situations including business trips. Since you've already tried a direct approach and asked him to stop, you should notify your immediate supervisor, Human Resources or the Ethics Hotline.

**FOR MORE INFORMATION**, please refer to our Anti-Harassment Policy, as well as our Reporting Violations Policy located on the Portal.

# WE DO WHAT WE SAY AND HONOR OUR COMMITMENTS.

## WE PROVIDE A SAFE, HEALTHY WORK ENVIRONMENT

Establishing and managing a safe and healthy work environment is not only our policy—it is the law and the right thing to do. Therefore, we will comply with all regulatory requirements regarding health and safety in all of our Company operations.



### WHAT IF...?

**Q** I've noticed some practices in my area that don't seem safe. Who can I speak to? I'm new here and don't want to be considered a troublemaker.

**A** It is your obligation to discuss your concerns with your supervisor. There may be very good reasons for the practices, but it is important to remember that raising a concern about safety is never viewed as causing trouble—it is being responsible. If your concerns are not resolved by notifying your supervisor, contact any of the other resources listed in this Code.

**FOR MORE INFORMATION**, please refer to our Occupational Safety and Health Policy located on the Portal.

## WORKPLACE VIOLENCE

To ensure a safe, healthy workplace, we may never engage in any hostile physical contact, intimidation, threats of violence or any other actions that may be considered threatening or hostile in nature. This applies when we are on Elbit Systems of America premises, at a Company-sponsored function or otherwise acting on the Company's behalf.

## DRUGS AND ALCOHOL

Our various stakeholders depend on us to perform our jobs with focus and determination. Therefore, the use of alcohol or illegal drugs in the workplace is strictly prohibited. Using any substance—including prescription drugs—which may adversely affect your ability to perform your job responsibilities safely and effectively is a violation of our Code and the law.

## WE RESPECT EACH OTHER'S PRIVACY

We are expected to treat each other's personal information with the same care and consideration that we do our own. Therefore, Elbit Systems of America maintains only those personnel and medical records necessary for business, legal or contractual purposes. Access to such records and the information they contain may only be shared with those who have a business need to know it. In addition, we comply with all applicable laws regulating the disclosure of personal information about employees.

If you receive requests for information about present or former employees, such as a reference check or credit reporting, refer the requestor to Human Resources.



### WHAT IF...?

**Q** A coworker seems to be under the influence of drugs. I'm worried that he might cause a safety problem and hurt himself or others. What should I do?

**A** You're right to be concerned. If you're comfortable doing so, talk to your colleague first. But if you believe there is a safety risk, also speak with your manager. Anyone on the job who is impaired by alcohol or any drugs—legal or illegal—is a safety risk. Steps need to be taken immediately to address the problem.



### WHAT IF...?

**Q** I found a report on the photocopier containing a lot of confidential records, including payroll information. I do not want to get anyone into trouble, but I do not think it is right that this kind of information is left for all to see. What should I do?

**A** You should return the report to Human Resources in confidence right away and report your discovery and actions to an HR Manager. Protecting confidentiality and privacy is the responsibility of every employee. Whoever left the papers in the copier will be counseled on their duty to protect the confidentiality of employee data.

**FOR MORE INFORMATION**, please refer to our Employee Handbook located on the Portal.



# WE DO THE RIGHT THING FOR OUR SHAREHOLDERS

*We are honest, forthright and direct.*

## WE DO NOT ENGAGE IN INSIDER TRADING

Since our parent company, Elbit Systems Ltd., shares are publicly traded, all persons having “inside information” regarding our activities are subject to applicable insider trading laws.

“Insider trading” is the use of material, non-public information for personal gain or to “tip” others who might make an investment decision based on this information. This activity is not only unethical, but also illegal.

Keep in mind that these laws apply not only to Elbit Systems Ltd. securities, but also to the securities of other publicly traded companies if we learn “inside information” about them. If you come across inside information during the course of your work, you are not permitted to use or share that information for stock trading purposes.

All non-public information about Elbit Systems Ltd. or Elbit Systems of America should be treated as proprietary information and should not be disclosed to anyone without a business need-to-know it. Violations of insider trading laws may subject the individuals involved to disciplinary action, up to and including termination, as well as criminal or civil liability.

### EXAMPLES OF “MATERIAL, NON-PUBLIC INFORMATION” INCLUDE:

- Financial results and forecasts
- Significant gains or losses in business
- Pending or proposed corporate sales, acquisitions or mergers
- Major restructuring programs
- Changes to the Board of Directors or other key executive positions
- Significant news, acquisitions and contract awards
- Significant potential litigation or developments in litigation

Any such information that has been published in accordance with Company policy and procedures is no longer considered “inside information.”



## WHAT IF...?

**Q** A supplier told me about a new product in confidence. We cannot use the product, but I think it has real potential and that shares in the supplier's company will go up fast. Can I buy stock in the company?

**A** No. You cannot buy the supplier's stock until the information you have is publicly available. You currently have "inside information" which was given to you in confidence and has not been publicly disclosed. This is information that a reasonable investor would probably consider important in making an investment decision about the company.

## WE CREATE ACCURATE CORPORATE RECORDS

In keeping with our commitment to legal and ethical conduct, we must provide a clear, accurate picture of our financial records to the public. If your job duties include the preparation or filing of any reports or documents that Elbit Systems of America must submit to any government agency, customer, or other party, you are expected to make full, fair, accurate, timely and understandable disclosure in all such reports. In addition, all of us must maintain accurate records and retain them in accordance with the law.

Falsifying any of our Company's books, records or documents will result in immediate dismissal. In addition, falsifying books and records may subject you to civil and criminal liability under applicable laws.

**FOR MORE INFORMATION**, or if you have any questions or uncertainty whether information in your possession may be considered "inside information" you should consult the Legal Department.











## WHAT IF...?

**Q My supervisor asked me to record an entry which will result in a possible misstatement of the value of an asset on our books. Should I do what she asks?**

**A** No. You may not ever knowingly misstate the value of an asset. Doing so would be a misrepresentation. It could be fraud. You need to discuss your concern with your supervisor but, if you are not comfortable doing so, seek immediate help using any of the other resources listed in the Code.

**Q We are required to complete weekly quality tests when we make a particular product. If we are busy, we sometimes skip the tests, do them later and then backdate the results. This helps manage our workflow, but is it allowed?**

**A** No. As well as being against Company policy, this may be illegal—because you are effectively falsifying data. Tests must be carried out at the right time and the results recorded accurately. “Accurately” includes truthfully recording the actual test date. If your workload makes it hard to find time for the tests, you need to raise this with your manager.

## COOPERATION WITH INVESTIGATIONS

At times, you may be asked to participate in an internal or external audit or investigation. In these situations, you are expected to fully cooperate with any audits conducted by our internal audit staff, external auditing firm or state and federal regulatory examiners. If requested by authorized individuals, you must provide these parties with the information to which they are entitled. Do not make any false statements to internal or external auditors, Company representatives or regulators. Doing so can be a crime and may result in severe penalties.

**FOR MORE INFORMATION**, please refer to our Government Investigations Policy located on the Portal. If you have a concern that the information requested may raise an ethical issue then you should consult the Ethics Officer or Legal Department.

# WE DO THE RIGHT THING FOR OUR COMMUNITIES

*We actively contribute to the communities in which we live and work.*

## SERVING OUR COMMUNITIES

Employees are encouraged to take an active role in their communities and to participate in Company-sponsored community activities. Your participation in Company-sponsored community activities is voluntary and you should never feel pressured or required to participate, either by financial contributions, your efforts or presence.

If you volunteer to help charitable organizations, be sure that your participation does not interfere with your work, do not make any direct or indirect contribution on behalf of the Company unless you are specifically authorized to do so, and when you are representing the Company, demonstrate an ethical and professional demeanor.



### WHAT IF...?

**Q** My business unit has given materials and surplus equipment to local schools for their science classes. Are these donations allowed?

**A** Yes. In-kind contributions to schools or local governments play an important part in our community relations and are allowed. Because they might be subject to local regulations, and could be viewed as a conflict of interest, they should always be handled by the Corporate Ethics Department. Donations must always be to a school or government body, rather than to any individual working for it.



## POLITICAL ACTIVITIES IN THE WORKPLACE

While each of us is encouraged to support the political parties, candidates and causes of our choice, we may not use Company funds or resources when doing so. Nor may we conduct our personal political activities during Company time or with Company resources such as telephones, computers or supplies. We must also avoid attributing our personal political views to Elbit Systems of America.

When allowed by law, our Company may occasionally contribute to a local initiative or campaign. If you are asked to make a contribution on the Company's behalf, contact the Vice President, Government Relations immediately before responding to any request.

## ELBIT SYSTEMS OF AMERICA PAC

As interested citizens, eligible Elbit Systems of America employees are free to make individual, personal contributions to candidates of their choice. Eligible employees may also participate in the Elbit Systems of America, LLC Political Action Committee (Elbit Systems of America PAC). However, not all of us are able to participate.

To determine if you are eligible to participate in the PAC, please contact the Vice President, Government Relations. PAC officers are responsible for ensuring that our Company's administrative and financial support conforms to Federal Election Commission requirements.

**FOR MORE INFORMATION**, please refer to our Political Activities Policy located on the Portal.



### WHAT IF...?

**Q** I went to a fundraising dinner for a candidate for a local government office. This candidate takes positions favorable to our interests, so can I claim the dinner on my expense report?

**A** No. If you did this, it would be considered a political contribution, which would violate our policies. While you are free to attend political fundraising events as an individual, you must not use Company assets or funds or give the impression that you are representing Elbit Systems of America. If you think your involvement might create a conflict of interest or appear inappropriate, discuss it with your manager.



## WE RESPECT HUMAN RIGHTS

We are committed to respecting the human rights and dignity of everyone. We comply with all applicable laws pertaining to fair employment practices as well as laws prohibiting forced and compulsory labor, child labor, employment discrimination and human trafficking. We will not tolerate abuse of human rights in our operations or in our supply chain.

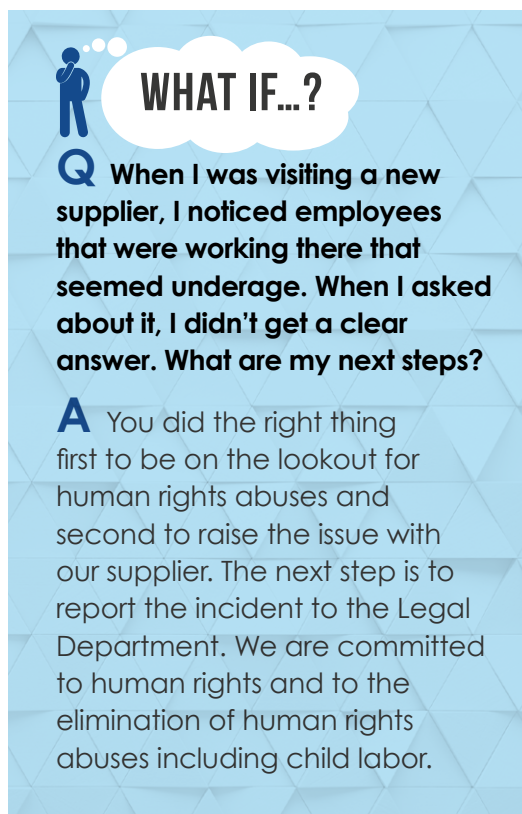
If you have any suspicion or evidence of human rights abuses in our operations or in the operations of our business partners, report your concerns to your supervisor or use any of the reporting channels in this Code.

## WE PROTECT THE ENVIRONMENT

We are committed to protecting the environment in which we live and work. We abide by all applicable environmental laws and regulations in the states and communities in which we operate. We consider the environment in every design aspect of our products, processes and services.

We work to continuously improve our conservation efforts. Be proactive and look for ways to reduce waste and use energy and natural resources more efficiently. Recycle when you can and speak up if you have any suggestions about reducing our environmental impact.

**FOR MORE INFORMATION**, please refer to our Environment Policy located on the Portal.



**WHAT IF...?**

**Q** When I was visiting a new supplier, I noticed employees that were working there that seemed underage. When I asked about it, I didn't get a clear answer. What are my next steps?

**A** You did the right thing first to be on the lookout for human rights abuses and second to raise the issue with our supplier. The next step is to report the incident to the Legal Department. We are committed to human rights and to the elimination of human rights abuses including child labor.

**FOR MORE INFORMATION**, please refer to our Human Trafficking Policy located on the Portal.



## WAIVERS OF OUR CODE

Any exception to, deviation, waiver or amendment of this Code must be fully described and approved in advance and in writing by the Elbit Systems of America General Counsel. Any waivers or amendments of our Code must comply with all applicable laws, rules and regulations. Such waivers or amendments will be promptly disclosed to shareholders and will comply with all applicable securities laws and regulations and all applicable stock exchange rules and requirements.

