

ETHICS

STANDARDS OF BUSINESS CONDUCT



INTRODUCTION



In our five decades as the federally funded research and development center for national security space, technical excellence, objectivity, and integrity have been the prime deliverables of The Aerospace Corporation. Our reputation for disciplined adherence to our corporate code of ethics is valued by our customers.

In recognition of our commitment to ethical behavior, in 2008 and 2009 the Ethisphere Institute declared Aerospace to be one of the “World’s Most Ethical Companies.” Ethisphere is a nonprofit institute dedicated to the research and promotion of profitable best practices in global governance, business ethics, compliance, and corporate responsibility.

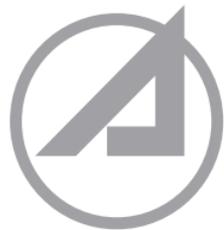
Through our ethics program, we strive for every employee to understand our high standards and how their actions help us deliver on our promise to deliver 100 percent mission success and to live our other corporate values of technical excellence, commitment to our people, objectivity, and integrity.

Our ethics program has been effective in the past because of the dedicated commitment of all of our employees. Your continued personal commitment to these basic principles is critical to our future.

A handwritten signature in black ink that reads "Wanda M. Austin". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Dr. Wanda M. Austin
President and CEO
The Aerospace Corporation

- Our Corporate Values
- What Are Ethics?
- Above All, Treat People Fairly, Honestly, and with Dignity
- Obey the Law



OUR CORPORATE VALUES

It is our values and our
commitment to them
that define who we are.



The background of the slide features a blue sky with white clouds. On the right side, there is a vertical strip showing a rocket launch with a bright orange and yellow flame. A small circular logo is visible in the upper right corner of this strip.

› DEDICATION TO MISSION SUCCESS

Committed to assuring 100-percent space mission success

› TECHNICAL EXCELLENCE

As the technical conscience of national security space, Aerospace tackles the tough questions and delivers the tough answers

› COMMITMENT TO OUR PEOPLE

A rare collection of the smartest people in the field, fully empowered to do their best thinking and their best work

› OBJECTIVITY

A truly independent and unbiased nonprofit organization, with no competing agendas or incentives

› INTEGRITY

Always delivering the technical truth, no matter what

WHAT ARE ETHICS?

Ethics are those moral principles or values that govern the conduct of individuals and groups. They are those guidelines that define our duties and obligations and help us to distinguish right from wrong, good from bad. Ethics are both codified in and supported by the laws, rules, customs, and practices that people sharing similar values adopt to govern their relationships with one another.

This booklet distills our ethics and values into basic principles to help us to conform our conduct to support our common values.

Ethics are those moral principles or values that govern the conduct of individuals and groups.

ABOVE ALL, TREAT PEOPLE FAIRLY, HONESTLY, AND WITH DIGNITY

For our Employees. One of our fundamental values is our commitment to our people. We are committed to honesty, fairness, and integrity in dealing with our employees. In furthering this goal, we are committed to equal opportunity for our employees and to a workplace free from any form of harassment based on race, sex, age, color, creed, religion, physical challenge, national origin, or veteran status, or any other form of behavior contrary to the fundamental human dignity of the individual.

For our Customers. Our commitment to our customers is to serve them to the absolute best of our ability, with integrity and objectivity, and to strive to set the standard for technical excellence in the application of space technology to assure the success of their mission.

For our Suppliers. We pledge to deal with our suppliers in a fair and open manner in a spirit of free and open competition, with favoritism to none and with our decision-making process influenced only by considerations of quality, performance, and price.



OBEY THE LAW

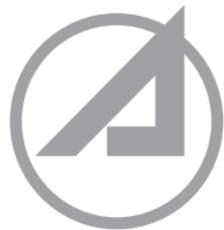
While ethics and values can get into grey areas requiring judgment and personal responsibility, obeying the law is a minimum, absolutely essential component of our corporate and individual conduct.

The laws and regulations applicable to those who contract with the United States government are far-reaching and complex. Many of these laws are discussed below. The corporation conducts its business in accordance with all applicable laws and regulations.



Obeying the law is a minimum, absolutely essential component of our corporate and individual conduct.

- Perform Your Professional Duties in a Manner Consistent with the Corporation's Values
- Protect the Corporation's Property and the Property of Others
- Avoid Questionable Gifts and Favors
- Carefully Supervise Outside Consultants
- Be Aware of and Observe the Other Laws that Affect our Business
- Do Not Perform Personal Services
- Avoid Inherently Governmental Functions
- Promote a Safe and Healthy Work Environment



PERFORM YOUR PROFESSIONAL DUTIES IN A MANNER
CONSISTENT WITH THE CORPORATION'S VALUES



1. OBJECTIVITY

The unique and privileged position that The Aerospace Corporation occupies with its customers cannot be compromised by any relationship — business, financial, or personal — that might be considered a conflict of interest. Objectivity, independence, and integrity are essential to this unique position.

Participation in a customer/contractor/Aerospace team does not mean that you cannot express a minority Aerospace opinion if the team's conclusions are in conflict with our values; in fact, it is your obligation to do so if circumstances dictate.

At no time are our shared values more critical than during source selections, when our employees function as objective members of a customer/contractor/Aerospace team. When working in this capacity, employees assisting the customer in the selection of a contractor report directly to the customer as advisors. This further insulates them from even the perception of company influence.

2. CONFLICT OF INTEREST

Individual Conflict. Every individual associated with Aerospace, whether as a trustee, officer, employee, or consultant, must avoid any activity that might detract from, or conflict with, the company's interests. To this end, management establishes guidelines for all concerned to avoid conflicts of interest.

As a condition to commence employment and annually thereafter, corporate officers, other management officials, and employees are required to review their business, financial, and other such relationships to ensure that conflicts of interest do not exist, and are required to complete an online certification. We are sometimes not the best judges of relationships and other things that others might view as conflicts. You, for example, may know that you would never change your opinion or a written report because a customer took you out to a sporting event or bought your lunch, but others could easily view accepting such a benefit as impairing your fairness and objectivity, or at least creating the perception that it could have. Any doubt cast on your fairness and objectivity damages both you personally and the company.

Organizational Conflict of Interest. In addition to personal conflicts of interest, the work the corporation performs for one customer could conceivably conflict with current or anticipated work for another customer. The corporation has procedures in place to prevent these conflicts, called "organizational conflicts of interest," from occurring and for remedying them when, despite our best efforts, they do occur. Employees should review these procedures and be vigilant in identifying all such potential conflicts and bringing them to the attention of their management.

Outside Interests. Aerospace does allow employees to engage in other outside business activities, which can be rewarding both professionally and monetarily, provided that there is no conflict with the corporation's mission and contractual obligations. While the use of facilities, equipment, and other corporate resources is not authorized for personal business interests, nominal use of such

resources may be approved to support employee participation in professional associations when in the interest of the corporation and the individual.

If you have any questions about whether a relationship poses a potential conflict or could create the perception of such a conflict, talk to your supervisor or contact the Internal Audit Department or Office of the General Counsel.

3. KEEP ACCURATE AND COMPLETE RECORDS

Record Costs Properly. The Aerospace cost-collection system is a vital tool for ensuring that all billings to its customers accurately reflect the actual amount due for its services and are properly screened for unallowable or otherwise nonbillable costs or fees.

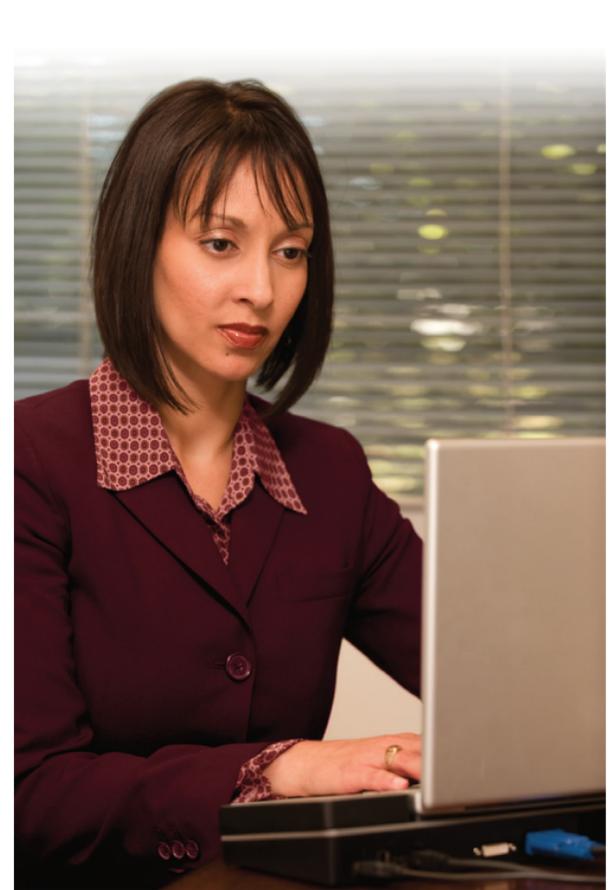
Charge Your Time Carefully and Accurately. Employees are an essential part of the company's efforts and all employees must ensure that their time is properly charged only to the appropriate job order numbers, and that travel and other expenses are consistent with customer requirements and in compliance with company policies and practices. Timekeeping is to be done daily. This helps to ensure more accurate time recording and complies with our contractual commitment to our customers to record our work effort on a daily basis.

Get Appropriate Approvals. The Signature Authorization System is the means by which authority to approve internal actions is delegated within the corporation. Properly approved internal documents are the basis for these actions and for the preparation of documents legally committing the company.

4. DO YOUR JOB

Although this one may seem obvious, it means a bit more at Aerospace. Our government customers expect from us technically accurate, objective advice. Often, this advice may be contrary to a contractor's input, other government representatives' input, or even another Aerospace employee's input. An Aerospace employee who finds that such a difference of opinion could impact mission success is required to escalate his or her concerns to the proper level, even if that means moving those concerns through all management layers up to the level of the President and CEO.

All employees have this obligation, not just members of the technical staff. And the potential problem can take any form: equipment being purchased that is not suited to the identified need; an administrative software program that has a serious potential vulnerability; or any one of a number of situations that can arise in our daily work. If such a situation occurs, make your concerns known and ensure that the concern is resolved satisfactorily. It is this dedication to integrity and giving the fact-based answer, no matter what, that has given Aerospace the reputation it has.



PROTECT THE CORPORATION'S PROPERTY AND THE PROPERTY OF OTHERS

In the performance of the corporation's mission, we are entrusted with property belonging to others, not only tangible property (for example, government- or contractor-furnished equipment), but also intangible property, such as government-classified and proprietary, confidential, or sensitive material belonging to contractors and others.

Classified Information. The importance of preventing disclosure of classified information that could be of value to saboteurs, competitors, and espionage agents, including those engaged in industrial espionage, cannot be overstated. Employees are expected to comply scrupulously with all company policies and practices concerning classified information. To report known or suspected security violations, call the Security Hotline, 310-336-6149.

Proprietary Information. The corporation is committed to respecting proprietary information, whether developed by Aerospace or by government agencies, contractors, or other sources to which Aerospace has received access. This is true whether the information was delivered or received orally, in writing, or by electronic means.

Aerospace Originated. The corporation generates sensitive administrative information and controlled-access technical information vital to its reputation as a leader in space technology. Aerospace safeguards this information by identifying it as "Sensitive but Unclassified," or "SBU," and by ensuring its safekeeping and proper destruction. External distribution or disclosure of such Aerospace-originated information is not permitted, except in conformity with company policies and practices.

Externally Originated. When proprietary information is accepted from an external source, it must be protected by every practicable precautionary measure to avoid improper use or disclosure to unauthorized persons. This information is also safeguarded as SBU in accordance with company practice.

The company recognizes that none of us is perfect and that we all make mistakes. If you discover that you have improperly handled classified, SBU, or proprietary information, notify the Security and Safety directorate (in the case of classified material) or the Office of the General Counsel (as to proprietary or SBU information) as soon as possible. It is far better to self-report a mishandling or suspected mishandling of such information than to have it come to the company's attention by the affected contractor or some other third party.

Questions relating to proprietary information should be directed to the Office of the General Counsel or the Security and Safety Directorate.

Public Dissemination of Information. Aerospace zealously guards against the inadvertent release of classified or sensitive information. Even seemingly innocuous requests for information can include "loaded" questions. Corporate Communications coordinates all contacts with the news media and the approval of company information intended for public release, such as photographs, presentations, brochures, and speeches. Professional papers are approved for release through the Security and Safety Directorate.

Even seemingly innocuous requests for information can include "loaded" questions.



REPRESENTING AEROSPACE.

Contract-Related Matters. We at Aerospace are sometimes asked by formal and informal groups — usually study groups, boards, or panels — to represent the corporation in contract-related matters. Participation requires management approval for formally constituted groups.

Noncontractual Matters. When employees represent the company in noncontractual matters, formal or informal, management-level 3 approval and a conflict-of-interest review are required. Accepting fees for this work is not condoned, and there must be neither the perception of a conflict of interest nor double payment for work performed. Reimbursement may be made for travel and other out-of-pocket expenses. This does not, however, prevent employees from accepting honoraria or fees for lectures or tutorials unrelated to company projects if the services rendered are not conducted during company-paid time. Refer to applicable company practices for additional guidance or call the Office of the General Counsel.

AVOID QUESTIONABLE GIFTS AND FAVORS

Government Personnel. The corporation scrupulously adheres to the laws and regulations governing the acceptance by government employees and officials of entertainment, meals, gifts, gratuities, and other things of value. Other than promotional items of nominal value (\$20 or less), it is our policy not to give gifts or other things of value to government personnel. Acceptable items may include coffee mugs, promotional T-shirts, and similar items displaying the corporation's or a program's name or logo, and modest refreshments in connection with business activities. Even seemingly innocent gifts may run afoul of government ethics rules. For example, if three Aerospace employees contribute \$10 each to a pool for a baby shower or birthday present for a government employee, the government employee, the Aerospace employees, and the company may all be viewed as having broken the law on the giving and accepting of gifts by government employees.

Nongovernment Personnel. Long-term working relationships with representatives of customers and suppliers occasionally develop into sincere friendships. Even in this context, however, common sense must be used in accepting or giving a gift under circumstances where there could be the perception of a conflict of interest or impropriety. Any "gift" tendered or accepted to influence a business decision is wrong and could constitute a criminal act, irrespective of the cost of the gift and the closeness of the friendship.

In this area, particularly, two useful maxims are "**When in doubt, DON'T!**" and "**If the area's grey, stay away!**"

Foreign Government Personnel and Public Officials. The Foreign Corrupt Practices Act of 1977 (U.S. Public Law 95-213) makes it a felony for any U.S. person to offer a bribe to a foreign official, foreign political party, party official, or candidate for foreign political office to assist in obtaining, retaining, or directing business to any person.

If any unethical or illegal act is necessary for the corporation to obtain or retain business, we will decline that business. No gift intended to influence any business dealing in which the corporation is involved may be given to, or received from, any foreign national.

The corporation will observe the laws of foreign countries in which it operates concerning payment of agent's fees and commissions, provided these laws are not in conflict with U.S. law. Since any such payments may be subject to legal scrutiny, the written approval of the President of Aerospace and the Office of the General Counsel must be obtained before payment is made.



CAREFULLY SUPERVISE OUTSIDE CONSULTANTS

Aerospace consultants subscribe to the *Code of Professional Ethics for Consultants to The Aerospace Corporation*. When consultants have access to nonpublic information related to company contracts, they are expected to protect the confidential nature of that information and not use it for financial or business advantage. Reports, notebooks, computer programs, and computer printouts are provided to Aerospace at specified intervals during and after the consulting project, at which time the documents become the property of the corporation.

Consultants must not release results of their Aerospace work without written permission from the corporation.

BE AWARE OF AND OBSERVE THE OTHER LAWS THAT AFFECT OUR BUSINESS

Revolving Door Policy. The government has adopted regulations dealing with the employment of former government employees and officials by companies with which the employees or officials might have been involved in their official capacities.

To avoid even the appearance of conflict of interest, both for the corporation as well as the government employees with whom we work, Aerospace does not recruit federal government civilian or military employees for employment. Moreover, company policy further restricts the hiring of any employee or recent former employee of any federal agency if the applicant was closely involved with the corporation. A special two-year rule applies in the case of Air Force Space and Missile Systems Center (SMC), the National Reconnaissance Office (NRO), and Air Force Space Command (AFSPC) personnel, as well as other situations as addressed in the practice. Exceptions to this policy require approval by the President of Aerospace.

Export Regulations. Much of the work we do in the nation's interest has national security implications. Because of our country's interest in promoting nuclear nonproliferation and preventing the spread of other weapons of mass destruction, the export of technology related to missiles and satellites is particularly sensitive.

It is not only manufactured goods like guidance systems and supercomputers that must be carefully reviewed before they can be exported: the kind of information and data with which we deal on a daily basis — formulas, algorithms, design specifications, modeling and simulation tools, and a great deal more — are subject to strict export controls. Moreover, it is not necessary to

take information out of the country to trigger the need for export compliance: discussing export-controlled information with a foreign national or with a U.S. citizen representing a foreign national or company might trigger such requirements, even if those conversations are within the United States.

Note especially that your laptop computer, to say nothing of what might be on it, may be subject to export requirements if you propose to take it out of the country. Airport security personnel are increasingly subjecting laptops to content searches at airports, and occasionally confiscate laptops that appear to have government or sensitive information on them for further review. In addition to the possible loss of use of your computer for an indefinite time, any improperly stored data or information on your computer could subject you to legal penalties and loss of your security clearance. When traveling, extreme care must be exercised to make sure that there is nothing on your laptop, USB or “flash” drives, or other media that is subject to export control or is otherwise sensitive.

Political Activities and Lobbying. As a nonprofit organization, Aerospace cannot support any political activity that favors one party, candidate, or issue over another. By the same token, partisan political activity by employees is not permitted on company time or premises. Restrictions on political activities also apply to employee organizations. For example, the Aerospace Women's Committee and the other affinity groups sponsored by the corporation are restricted in their political activities by the same rules that govern the corporation.

The corporation also does not participate in lobbying activities. Aerospace strictly conforms to legal and ethical constraints in its relationships with government agencies. The Office of Government Relations, resident in our Washington office, maintains contact

with members of the U.S. Congress and appropriate branches of the U.S. Government, and is the primary point of contact for government relations activities.

...Aerospace cannot support any political activity that favors one party, candidate, or issue over another.

Integrity in Procurement. The acquisition of goods and services by the corporation is accomplished in accordance with corporate policy, government regulations, contractual requirements, and good business practice.

Only specifically authorized individuals can contractually commit the corporation to purchases and acquisitions, and then only by authority of a properly approved internal action document.

Procurement activities are conducted with the highest ethical standards, free from prejudice and favoritism, to maintain corporate and employee fairness and integrity in our relations with customers, suppliers, and the public.

All procurement activities must be conducted with integrity, good judgment, and common sense, consistent with the guidelines set forth in our policies and practices.

All procurement activities are conducted with integrity, good judgment, and common sense...

DO NOT PERFORM PERSONAL SERVICES

Certain kinds of services are not supposed to be performed by Aerospace even if requested by our customers. Our charter is to provide scientific, technical, and engineering services, not to perform routine services that could be performed by other contractors. These other kinds of services are generally referred to as “personal services.”

The Federal Acquisition Regulation (FAR) and FFRDC User’s Guide describe personal services as those characterized by or similar to an employer-employee relationship, where contractor personnel are subject to relatively continuous supervision and control of a government officer or employee. These would typically be routine technical, administrative, or management services.

Why is this of concern to Aerospace? We do not want our integrity to be called into question. Aerospace does not want to be perceived as a conduit for circumventing our customers' manpower ceilings or as evading the intent of the Civil Service regulations.

AVOID INHERENTLY GOVERNMENTAL FUNCTIONS

The FAR also states that contracts for services "...shall not be used for the performance of inherently governmental functions." With respect to the acquisition support we provide pursuant to the User's Guide, the FAR lists specific activities that are the sole responsibility of the government:

- Determining what supplies or services are to be acquired by the government.
- Participating as a voting member on performance evaluation boards or source selection boards.
- Approving any contractual documents, including documents defining requirements and evaluation criteria.

Why is this of concern to Aerospace? Again, we do not want our objectivity or integrity to be questioned. Employees must not perform functions that are the government's responsibility. During the acquisition process, Aerospace's role is limited to *providing independent recommendations and technical advice* to our customers. Any actions outside of this role would not only impair Aerospace's objectivity, but could also result in violations of the FAR.

Personal Services and Inherently Governmental Functions are two areas where Aerospace employees can face challenges in balancing the corporation's commitment to mission success with three other corporate values: integrity, objectivity, and freedom from conflicts of interest. By being aware of these challenges, Aerospace can continue to serve its customers while maintaining its commitment to these fundamental values.

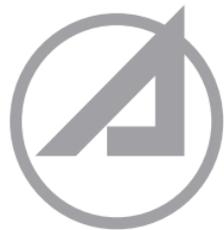
PROMOTE A SAFE AND HEALTHY WORK ENVIRONMENT

Substance Abuse. Substance abuse can affect job performance and reliability as well as personal welfare. The resulting behavior often produces a "ripple effect," causing problems for the abuser's management and fellow employees, and can create security and safety risks. Substance abuse is illegal and can result in termination.

Supervisors who have reason to believe that an employee has a substance-abuse problem are required to notify an Employee Relations representative.

Any employee with a substance-abuse problem can seek help through the corporation's Employee Assistance Program. Company policy requires employees to notify the Principal Director, Security and Safety Directorate, within five days if convicted of a drug violation.

- Ethics Awareness Program
- Signposts for the Wary
- Still Unsure of What To Do?
- A Summary of Our Code of Ethics
- References



A photograph of four people (three men and one woman) sitting around a table, looking at and pointing to documents. They appear to be in a professional meeting or workshop. The woman has a long braid and is wearing a black jacket with a cross necklace. The man on the far right is wearing glasses and a blue shirt. The man in the middle is wearing a blue checkered shirt. The man on the far left is wearing a dark suit jacket over a light shirt. The background is a purple wall.

ETHICS AWARENESS PROGRAM

The corporation's commitment to an ethical business climate is buttressed by its Ethics Awareness and Anti-Fraud Programs, both of which are accessible on the corporate website. Timecard mischarging, inappropriate use of company assets, improper expense reporting, and other abuses can subject the company and the employee to serious legal repercussions.

Employees must be diligent in guarding against even honest error. An innocent mistake on a timecard, for example, could be construed by the government as overbilling.

The U.S. Government requires accurate reporting of time spent working on company projects. The False Claims Act (31 U.S.C. 3729) requires that we adhere to rigorous standards of accuracy in reporting time and effort data to the government.

Excessive or other inappropriate personal use of company property is also contrary to company policy. Using company computers or internet services to access inappropriate (e.g., adult-oriented) websites; misusing company telephones, 800 lines, or fax machines to conduct personal outside business activities; and similar abuses can result in disciplinary actions, including termination. Be honest and fair in your use of company property.

Hotline. Employees are required to report known or suspected violations of the Standards of Business Conduct to their supervisors or the company's Fraud, Waste, and Abuse Hotline, ext. 65677. The hotline is available to any employee who would prefer not to address these sensitive issues with a supervisor. While the hotline is not confidential — since it may not be possible to

investigate a complaint without the source of the information becoming known — employees can call the hotline without fear of recrimination or retaliation whenever they find themselves in questionable situations; for example:

- They are requested to engage in any activity they believe is contrary to provisions of the Ethics Awareness Program or company policy.
- They believe that the corporation or another employee, individual, or firm representing the corporation is engaged in conduct contrary to, or in violation of, this program or the federal law applicable to contracts with the U.S. Government.

The Company has a strict nonretaliation policy. Whenever an employee feels that he or she is being retaliated against as a result of reporting an act felt to be contrary to our ethics program, it should be reported to the General Counsel's office immediately. Retaliation will not be tolerated. If you are still not comfortable reporting a matter of concern using the hotline, you should feel free to put your concerns in an unsigned letter or memo addressed to the Office of the General Counsel, or Principal Director, Internal Audit, providing sufficient details of the questionable activity as will enable a thorough investigation.

Employees should feel free to call the hotline without fear of recrimination or retaliation whenever they find themselves in questionable situations...

SIGNPOSTS FOR THE WARY

Many in the public eye guide their conduct by what they call The New York Times Test, i.e., "How would I feel if what I'm doing right now were to show up tomorrow on the first page of The New York Times?" There are many other warning signs, however, when you are in or getting close to an ethical dilemma. Many of them we've heard before, but it's useful to be reminded that when you hear any of the following, it's time for some serious reflection.

"Oh, let's just do it this once. No one will ever know."

"My old boss let me do this. Why won't you?"

"Go ahead and do it, but don't leave any traces."

"It doesn't matter how it gets done so long as it gets done."

"We're not having this conversation."

"It may not be right, but it's in the best interests of the company."

"What's in this for me?"

This list is certainly not exhaustive, and there are many other ways that someone might broach a topic that indicates that you are approaching an ethical crossroad. At that point, stop and ask:

"Is what I'm being asked to do legal?"

"Are my actions fair and honest?"

"How would I feel if I were on the receiving end of my actions?"

"Will my actions stand the test of time?"

"Will I sleep soundly tonight?"

"What would I tell my son or daughter to do?"

And lastly, "How would this look on the front page of the newspapers?"



STILL UNSURE OF WHAT TO DO?

Ask, ASK, and ASK again until you know you are doing the best thing for all parties.

WHOM SHOULD YOU ASK?

- Talk to your peers. Chances are they've been there before.
- Talk to your management. They may have a more global perspective.
- Talk to the General Counsel's Office, Human Resources, Security and Safety, or Internal Audit. They are all here to help.

Bringing your questions and decisions into the light of day helps to protect you and the company with the knowledge that you're making the best possible choice.

*Ask, ASK, and **ASK** again until you know you are doing the best thing for all parties.*

A SUMMARY OF OUR CODE OF ETHICS

The Aerospace Corporation, a California nonprofit corporation, operates an FFRDC that provides technical oversight of space systems development primarily to SMC and the National Reconnaissance Office, but also, when in the national interest, to other government agencies, international organizations, and foreign governments. In pursuit of its mission, Aerospace upholds the highest ethical and professional standards. Toward that end, we affirm the following standards.

- We will maintain a strong commitment to objectivity, independence, and integrity in dealing with customers, suppliers, and business associates.
- We will zealously guard against the inadvertent public dissemination of sensitive information.
- We will recognize the importance of preventing unauthorized disclosure of classified information.
- We will respect and safeguard proprietary information entrusted to the corporation by taking precautionary measures to prohibit unauthorized disclosure of such information.
- We will act with integrity, good judgment, and common sense, avoiding even the appearance of impropriety when involved in the procurement process.

- We will avoid any relationship that might constitute a conflict of interest, in particular in carrying out the following activities:
 - Hiring U.S. Government employees
 - Representing the corporation
 - Conducting outside business activities
 - Accepting or offering gifts
 - Participating in political activities or candidacy
- We will preserve the corporation's reputation, ensure that all employees are made aware of their responsibilities and liabilities for personal conduct, and provide a hotline number for employees to call without fear of retaliation, recrimination, or retribution.
- We will improve the opportunities and quality of life for our employees and promote and ensure equal employment opportunity for applicants.
- We will recognize that the physical and psychological health of our fellow employees contributes to a substance-free workplace.
- We will continually monitor our cost-collection system, which is a vital tool for ensuring that all billings to customers are accurately and properly screened for unallowable or otherwise non-billable costs or fees.

A photograph showing two technicians in white cleanroom suits and hairnets working on a piece of equipment inside a large, circular industrial chamber. The chamber is illuminated with a green light. The technicians are focused on their work, with one using a screwdriver. The scene is framed by the circular opening of the chamber.

REFERENCES

Topics	Relevant Policies and Practices	
Authorized Signatures	BO-2-3	Delegation of Signature Authority
Classified Material	SE-1-4	Non-Accountable Classified Material —Transmission
Marking	SE-1-2	Classified Material — Marking
Protection	SE-1-3	Classified Material — Storage and Protection
see also <i>Sensitive Material</i>		
Conflict of Interest		
Individual	ST-1-2	Employee Conduct — Conflict of Interest
Organizational	OC	Organizational Conflict of Interest
	OC-1-1	Organizational Conflict of Interest (OCI) — Identification and Resolution
Government Employees	HR-1-5	Hiring of Federal Government Employees
Drugs	HR-6-2	Substance Abuse in the Workplace
Equal Opportunity	HR-1-11	Equal Employment Opportunity and Prohibition Against Discrimination

Topics	Relevant Policies and Practices	
Ethics Program, General	ST-1-1	Standards of Business Conduct — Self-Governance Program
Exports	SE-4-6	Export Control
Foreign Corrupt Practices Act	ST-1-5	International Business — Guidelines for Employee Conduct
Fraud, Waste, and Abuse		
In General	ST-1-1	Standards of Business Conduct — Self-Governance Program
Hotline	ST-1-1	Standards of Business Conduct — Self-Governance Program
Fraud Prevention	ST-1-6	Anti-Fraud Program
Gifts		
Foreign Government Officials	ST-1-5	International Business — Guidelines for Employee Conduct
Employees	ST-1-2	Employee Conduct — Conflict of Interest
Government Employees, Employment of	HR-1-5	Hiring of Federal Government Employees
Hotline, see <i>Fraud, Waste, and Abuse: Hotline</i>		

Topics**Relevant Policies and Practices**

Information, Dissemination of

Papers	TC-1-8	Professional Material Intended for External Release
Proprietary and Confidential	SE-1-1	Non-Accountable Classified Material — Control and Destruction
Proprietary Information	TC-1-3	Proprietary Information
Public Disclosure of	TC-1-8	Professional Material Intended for External Release
Sensitive	SE-4-1	Sensitive But Unclassified Material — Labeling and Control
International Business	ST-1-5	International Business — Guidelines for Employee Conduct
Politics, Political Activities	ST-1-3	Political Activities or Candidacy
Proprietary Information	TC-1-3	Proprietary Information
Representing the Corporation	ST-1-4	Employee Activities — Corporate and Self-Representation
Revolving Door	HR-1-5	Hiring of Federal Government Employees
Self-Representation	ST-1-4	Employee Activities — Corporate and Self-Representation

Topics**Relevant Policies and Practices**

Sensitive Material

Unclassified

SE-4-1

Sensitive But Unclassified Material — Labeling and Control

see also Information, Dissemination of

Sexual Harassment

HR-6-4

Prohibition Against Harassment and Retaliation

Signature Authorization

BO-2-3

Delegation of Signature Authority

Source Selections

TC-1-10

Air Force Source Selection — Use of Corporate Employees

Substance Abuse, *see Drugs*

Time Accounting

Exempt

FI-1-6

Time Recording — Exempt Employees

Nonexempt

FI-1-5

Time Recording — Nonexempt Employees



For additional copies of this brochure, call the Office of the General Counsel at 310-336-7097. If you have questions about how a situation should be handled consistent with Aerospace's Code of Ethics and the Standards of Business Conduct Program, contact the Internal Audit Department or the Office of the General Counsel.

