

HARRIS



CODE OF CONDUCT

MESSAGE FROM THE CEO

Dear Colleagues:

At Harris Corporation, integrity means more than just complying with the law. It's one of our core values and a cornerstone of our company. Integrity — in our words and actions — means never compromising our values in pursuit of business performance and success.

Preserving trust with our stakeholders is the responsibility of every individual in the company. Our Code of Conduct is designed to help us meet that obligation. The Code explains the policies and guidelines for how we conduct business around the world. Each of us is expected to know and understand the Code and abide by its principles.

If you have questions about the Code or need guidance about the right course of action, please don't hesitate to seek advice from any of the resources listed in the Code. When you think someone is not acting in compliance with our Code or policies, speak up promptly. Harris will not tolerate retaliation against anyone for asking questions or raising concerns in good faith.

Our continued commitment to integrity, acting honestly and ethically, and complying with the letter and intent of the law are critical to our continued success.

Thank you for following our Code and embracing our values.

Sincerely,



MISSION STATEMENT

HARRIS CORPORATION will be the best-in-class global provider of mission-critical *assured communications*® products, systems and services to both government and commercial customers, combining advanced technology and application knowledge to offer a superior value proposition.



OUR VALUES

INTEGRITY

In our words and actions.

We never compromise our values in pursuit of business performance and success.

CUSTOMERS

Exceeding expectations.

We are passionate about our customers' success and strive to exceed their expectations every day.

INNOVATION

Demonstrating initiative and creative thinking.

We challenge the status quo, embrace change and solve problems through innovation, agility and creative thinking.

EXCELLENCE

In everything we do.

We work relentlessly to obtain the highest quality results through continuous improvement and flawless execution.

RESULTS

Focused on driving business growth and shareholder returns and rewarding performance.

We succeed as individuals and as a company when we grow our businesses and create shareholder value.

INCLUSION

Embracing diverse ideas and talent.

We realize that success comes from diverse ideas and talent working together to achieve our goals.

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OUR CODE

AT HARRIS, our business culture and practices are founded upon a common set of core values that govern all of our activities and relationships. We are fully committed to our values. While we strive to exceed our customers' expectations every day, we never compromise our values in pursuit of business performance and success.

Our Code is a key part of our Business Conduct and Ethics Program; it articulates our shared values and responsibilities as a company. The Code also reflects our commitment to maintaining an honest and ethical culture. When we face legal issues or ethical questions, the Code can help us make the right choices.

Relationship of Our Code to Harris Policies and Applicable Laws

Upholding legal standards of conduct, while mandatory for every employee, is not enough. We are also responsible for maintaining our core values. Harris conducts business in many countries with differing laws, customs and requirements. We must comply with the laws and practices in the places where we do business. Occasionally, there may be (or appear to be) conflicts between laws and our Code or policies. In such situations, consult your Ethics Advisor or Business Segment Legal Counsel.



Compliance With Our Code Is Not Optional

Failure to comply with the Code, including our non-retaliation policy, may result in disciplinary action up to and including termination of employment. It could also expose you to civil liability or criminal prosecution. If an employee is found to have violated the law, we will fully cooperate with the appropriate authorities.

Waivers

No waiver, exception or exemption to the Code can be granted except with the prior approval of the Harris Board of Directors and disclosed as required by law.

Code Changes

Harris reserves the right to revise the Code from time to time. In no way should the Code be thought of as a contract of employment.

Our Responsibilities

All of us at Harris are expected to follow the Code in our work on behalf of the company. The Code applies to Harris' directors, executives, employees, agents and contractors. We also expect our suppliers, customers and other business partners to act in an ethical manner consistent with the values expressed in our Code. All employees are responsible for:

- ▲ Fostering a culture of ethical behavior and integrity;
- ▲ Understanding and following the standards of behavior outlined in the Code and in related company policies and procedures;
- ▲ Seeking guidance and advice from appropriate company resources to resolve questions or concerns about a course of action;
- ▲ Reporting instances of observed or suspected violations of the Code or related company policies; and
- ▲ Cooperating with investigations of alleged misconduct or suspected violations of the Code, policies, rules or laws.

Annually, you will be asked to certify that you have read, understand and will comply with the Code.

Leaders' Responsibilities

At Harris, our leaders play a key role in ensuring that our Business Conduct and Ethics Program is successful.

Our leaders are the first line of communication for employees when they have a problem or need advice or information. If you are a leader at Harris, you are responsible for:

- ▲ Acting with integrity and serving as an ethical role model for others;
- ▲ Promoting a culture of compliance and integrity regarding policies, procedures, regulations and laws;
- ▲ Fostering an open work environment where employees are comfortable raising questions or concerns without fear of retaliation;
- ▲ Maintaining a professional work environment and taking reasonable steps to prevent or detect improper conduct;
- ▲ Encouraging employees to ask questions and to report behavior that is inconsistent with our values or that they suspect may violate our Code or other policies;
- ▲ Communicating to employees your support of the Code and the Business Conduct and Ethics Program and the company's policy prohibiting retaliation; and
- ▲ Ensuring that employees complete required ethics awareness, compliance and other relevant training.





**OUR RESOURCES/
BUSINESS CONDUCT
AND ETHICS PROGRAM**

Making Ethical Decisions

No one document can anticipate every scenario in which you might encounter a legal or ethical question or outline every requirement or policy that exists. We should always use good judgment and common sense in our work. If you are faced with a situation where you are unsure what you should do, think about the following questions and let them guide your decision making:

- ▲ Does it reflect our core values?
- ▲ Is it lawful? Does it comply with our internal policies?
- ▲ Would I want other people—including my family—to know what I'm doing?
- ▲ Would I want to see my actions reported in the media?
- ▲ Would my actions have a positive impact on Harris and our shareholders?

Raising Concerns and Adviceline Reporting

All of us must report any suspected violations of the Code and ask questions when we are unsure about a certain situation or behavior. You are encouraged to first raise your concerns to a member of your management. You may also forward complaints or concerns to your Ethics Advisor, Human Resources Business Partner or to a member of the Legal Department. If you are not comfortable discussing a particular topic with these individuals, there are a number of additional methods available for raising your concerns:

- ▲ The Director of Business Conduct is responsible for the day-to-day matters pertaining to business conduct and compliance and is available to discuss any questions or concerns you may have. You can reach the Director of Business Conduct at **1-321-724-3023**.

- ▲ Call the Adviceline at **1-855-477-4272**, which you can do anonymously.
- ▲ If you are outside the United States, go to AT&T World Wide Connect <http://www.business.att.com/bt/access.jsp>, to obtain your country access number and you will be prompted by the AT&T tone to dial the Harris Adviceline number.
- ▲ Global Operations (except Europe) use the Harris **Adviceline** for online reporting.
- ▲ Global Operations in Europe use the Harris **E.U. Adviceline** for online reporting.

The Harris Adviceline telephone is answered 24 hours a day, 7 days a week by an independent third party. If you call the Harris Adviceline, you may identify yourself openly, remain completely anonymous, or identify yourself to the third party only.

For online reporting of concerns, you may also send an anonymous email to the **Director of Business Conduct**.

When you raise a concern or file a report concerning our Code, confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an investigation.

If you are located in Europe, please review the procedures for **Reporting Suspected Violations of Harris' Code of Conduct** - European Economic Area.

Accounting, Internal Controls and Auditing Matters

If you have concerns about accounting, internal controls or auditing matters at Harris or any possible violation of the securities laws, you may also report your concerns to the Vice President of Internal Audit at **1-321-724-3166**, the Director of Business Conduct or contact the Adviceline.

If you have any questions or concerns about accounting, internal accounting controls or auditing matters, please see [Complaint Procedures](http://harris.com/business-conduct/BOD-12-411Complaint_Procedures_Accounting_and_Auditing.pdf) at [http://harris.com/business-conduct/BOD-12-411Complaint_Procedures_Accounting and Auditing.pdf](http://harris.com/business-conduct/BOD-12-411Complaint_Procedures_Accounting_and_Auditing.pdf).

Training

Training is a key element of our Business Conduct and Ethics Program. Available courses focus on the laws and regulations that define the boundaries of our business behavior. Each course is designed to help you uphold this basic operating principle:

We will always do business with the highest standards of conduct and integrity.

Since we hold diverse positions with differing responsibilities, the business conduct and ethics training courses that are required for you may differ from courses required for others at Harris. It is up to you and your manager to determine your specific training requirements and to ensure your business conduct and ethics training is current and complete. You can find course descriptions and registration information on the Harris Intranet at:

<http://my.harris.com/bus-conduct/training.asp>.

Investigations

We will fully investigate any suspected violations of our Code. Each of us must fully cooperate with any investigations. The contents of all investigations will be treated confidentially, to the extent legally possible. If violations of our Code have occurred, we will determine what, if any, follow-up action is appropriate.

ETHICS ADVISORS

At least one Ethics Advisor is designated for each Harris location and is a resource to assist employees with questions about the Code. Our Ethics Advisors are trained in the Business Conduct and Ethics Program and are knowledgeable about their area of business. They are committed to supporting their fellow employees and have the resources available to do so. A list of current Ethics Advisors can be found at <http://my.harris.com/bus-conduct/contacts/default.asp>.



Retaliation is Strictly Prohibited

All questions, concerns, complaints and reported violations of our Code, policies, regulations and laws are taken seriously. We will not tolerate retaliation against anyone who raises a concern regarding our Code or participates in a business conduct investigation, even if the concern or complaint is ultimately determined not to have merit. An employee will not be discharged, demoted, suspended, threatened, harassed or in any way subject to adverse treatment in the terms and conditions of employment because of any such good faith report, including reports made to government agencies or other branches of government. Retaliation is a violation of our Code and a cause for disciplinary action, up to and including termination of employment (reference Harris Policy [HR-06, Non-Retaliation](#)).

Government Interviews of Employees

In addition to contractual reviews, audits, and requests for financial data or other information, employees may be directly contacted for interviews by Government representatives or agents, including representatives of the Federal Bureau of Investigation (FBI), Defense Criminal Investigative Services (DCIS), the Inspector General (IG), Internal Revenue Service (IRS), Defense Contract Audit Agency (DCAA), or other Government investigation services conducting civil or criminal investigations related to Harris or Harris employees. These contacts may occur at an employee's home after normal Harris work hours.

If contacted by a Government agent seeking an interview pertaining to company business, employees are requested to notify their manager and Harris Legal Counsel immediately. If contacted during non-business hours, employees are encouraged to contact Harris Legal Counsel at home. Employees have the right to decide whether or not to be interviewed. Employees also have the right to consult with an attorney,

including the employee's own private attorney, before deciding whether to be interviewed. The employee may lawfully defer an interview until an attorney has been consulted.

If an employee consents to a Government interview, the employee may determine the location, time, length, and scope of the interview. An employee has the right to terminate an interview at any time after it has begun. In any interview in which the employee elects to participate, the employee must always tell the truth to the best of his or her knowledge and belief. An intentional false statement to a Government agent may constitute a crime.

Harris Legal Counsel is available to consult with employees about any investigative issues and the interview process.

Note: The above guidance relates to company business and is not intended to apply where Harris employees are contacted by Government investigators conducting background investigations for the purpose of granting or renewing Government security clearances. These contacts are routine and the investigators will identify themselves and advise that this is the purpose of the interview.





OUR VALUES IN ACTION

INTEGRITY

IN OUR WORDS AND ACTIONS.

We must avoid situations where our own interests might conflict or appear to conflict with what is right for Harris.

Avoiding Conflicts of Interest

As employees of Harris, we must act in the best interest of the company and devote our full efforts to our jobs. Occasionally, situations may arise where our personal interests conflict, or appear to conflict, with the interests of the company. When these actual or potential conflicts of interests arise, it is important to disclose them to your manager or Ethics Advisor. By discussing these types of issues with your manager or Ethics Advisor you will help Harris resolve any potential issues these conflicts may create. While we cannot list every possible type of potential conflict of interest, here are some areas that require close attention.

Financial Conflicts

A conflict of interest can occur if you have a direct or indirect relationship or financial investment in a company that does business with Harris or a company that competes with Harris. You must disclose all of these investment interests to your manager. This is true even if your investments were in place before you began working at the company.

Personal Relationships

A conflict of interest, or the appearance of one, can also occur if you have a close personal relationship with a fellow Harris employee, someone who does business with us or someone who works for a competitor. Someone with whom you have a close personal relationship could be a member of your household, a close relative or a close friend. For example, if you manage or are managed by someone with whom you have a close personal relationship, there might be a conflict (or perceived conflict) of interest. Similarly, if you are involved in the hiring,

retaining or contracting of someone with whom you have a close personal relationship, a conflict of interest might also exist (or be perceived to exist).

Outside Employment and Other Activities

At Harris, we understand that some employees may choose to participate in additional work outside of their jobs at the company. However, you must avoid direct or indirect employment or other business connections with, or investment in, competitors,

ALWAYS REMEMBER

Recognizing a potential conflict of interest does not prohibit you from maintaining an interest or participating in a proposed activity. When employees bring forward a potential conflict of interest, often Harris can help resolve the issue in a way that works both for the individual and the company. The key is to bring the issue to the attention of the company so it can be addressed.

FOR MORE INFORMATION

If you have questions related to conflict of interest, you can contact your manager, Ethics Advisor or the Director of Business Conduct. You may also consult Harris Policy [G-2, Conflict of Interest and Outside Activities](#), for additional information.

suppliers or customers. Outside employment can potentially be a conflict of interest if it adversely affects Harris or your job performance.

Management and professional employees at the director-level and above are employed and compensated on the basis that their full business and technical abilities are devoted to Harris activities. These employees should not have outside business interests that require management or professional time or effort. The CEO can approve certain exceptions in advance of the outside employment. Exceptions for director-level and above employees may also be made for activities associated with nonprofit organizations, provided prior written approval is obtained from the appropriate level of management.

We encourage all employees to participate in professional societies and associations and to engage in civic and other voluntary community activities in accordance with personal and company interests. However, you must use good judgment in deciding how much individual time to commit to outside activities.

Company Opportunities

A conflict of interest can also arise when an individual uses his or her position with the company for personal gain. Harris employees cannot take advantage of opportunities that properly belong to Harris or that they become aware of through the use of company resources, information or their position. Additionally, you may not use company resources, information or your position for personal gain or to compete with Harris in any way. You should always attempt to advance the company's legitimate business interests in accordance with our core values when the opportunity to do so arises.

Preventing Bribery and Corruption

We are committed to conducting our business globally with integrity and transparency, free from improper influence and strictly in compliance with all antibribery and anticorruption laws. We must never offer or accept any type of personal benefit which could be considered to influence our business decisions or the decisions of the people and companies with whom we do business.

QUESTIONS AND ANSWERS

Q: I have been considering starting my own consulting service outside of my job at Harris. My proposed consulting service will primarily target small businesses. Is this a conflict of interest under company policy?

A: This activity will likely be a conflict of interest if the customers you serve are also Harris vendors, suppliers, customers or competitors, and it will be a conflict if Harris proprietary information will be used or disclosed. You should review your plan with your manager and Ethics Advisor before providing this service. If you are a director-level or higher position, you will also need an exception to our policy prior to starting the business.

[Click here for more frequently asked questions on Conflicts of Interest.](#)

Q: I want to take a part-time job, but a coworker said I need to have it reviewed and approved by the company. It's my business so why does the company need to know?

A: If there is any possibility that your proposed additional job may result in a conflict of interest, you should raise it as an issue so that your manager or Ethics Advisor can conduct a conflict of interest review to be certain it doesn't involve a competitor, supplier or customer, or otherwise create issues of concern. We may also want to remind you that company time or resources may not be used for secondary employment. If there are no issues, or if any concerns can be effectively addressed, your part-time job with another company would likely be approved.

Every country in which Harris has operations prohibits bribery. Many of these laws make it illegal to provide improper payments and gifts to representatives of both commercial and government customers. This includes improper payments and gifts made in that country and, in the case of payments and gifts to public officials, those made in another country.

Harris policy requires our employees, officers and representatives to comply with all applicable antibribery laws and never to make a payment or gift that may be construed as illegal or improper regardless of local law or customary practice.

Bribery is not just limited to cash payments. Bribes may include:

- ▲ Gifts, especially expensive gifts;
- ▲ Entertainment, hospitality and travel that go beyond business needs;
- ▲ Loans;
- ▲ Personal favors;
- ▲ Payment for travel expenses when there is not a clear business purpose for doing so;
- ▲ Political or charitable contributions; or
- ▲ A payment or benefit provided to an individual's family member in an effort to influence the individual.

Public Officials

Many antibribery laws, like the Foreign Corrupt Practices Act (FCPA) in the United States, the Bribery Act in the United Kingdom and the Clean Company Act in Brazil, specifically prohibit bribes to public officials. Generally, these laws make it unlawful:

- ▲ To give, offer or pay anything of value, directly or indirectly, to a public official:
 - To obtain or retain business; or
 - To gain an improper business advantage.

Some countries also make it an offense to fail to properly record payments to or for the benefit of public officials. Harris policies require that a system of internal accounting controls be maintained accurately to prevent concealment of bribes.

Third Parties

Our commitment to conducting business with integrity and without bribery or corruption applies to you and anyone acting on our behalf. We must take care in selecting agents, intermediaries and others who may be authorized to act on our behalf to help ensure they will not make a bribe in the course of their business dealings. You should never ask or permit an agent, intermediary or another third party to do something the Code, policies or laws prohibit you from doing.

QUESTIONS AND ANSWERS

Q: A consultant the company uses to assist with government relations recently asked us for a large increase in commissions. I suspect the consultant may intend to pass this “extra” money on to local officials. What should I do?

[Click here for more frequently asked questions on International Business Practices.](#)

A: Report your suspicions to your manager, Ethics Advisor or Harris Legal Counsel at once. No such payments should be made to the consultant until the company has investigated your concerns.

ALWAYS REMEMBER

We must take care when selecting third parties (e.g., sales agents, representatives, consultants and distributors) who conduct business on behalf of Harris. There are some red flags to look for when you are hiring third parties. Consider:

- ▲ Whether the third party is a government employee, a relative or friend of a government employee, or a candidate for public office;
- ▲ Whether the agent or intermediary wants payment “up front,” in cash, to a third party or to another country; and
- ▲ Whether the activities are not part of the agent or intermediary’s core business.

Penalties and Sanctions

Domestic and international antibribery and anticorruption laws are vigorously policed and enforced. Failure to comply can result in significant civil and criminal sanctions, both for Harris and the individuals responsible for the improper conduct. Company penalties can include fines, a ban on future government business and denial of export licenses. Sanctions for individuals that violate anticorruption laws include fines and imprisonment.

Gifts, Entertainment and Hospitality

The exchange of gifts and hospitality can foster relationships, celebrate business successes and help solidify business partnerships, but it can also potentially influence decision making or give the appearance of impropriety. We can only offer or accept gifts and hospitality if doing so will not compromise the integrity of our business relationships and we must never offer gifts, entertainment, favors, hospitality or gratuities to improperly influence customers, suppliers or others.

FOR MORE INFORMATION

Harris has created several resources to alert employees, intermediaries and agents to the latest developments and enforcement trends in the area of international antibribery and anticorruption laws. These resources include:

- ▲ Anticorruption compliance brochures on the Business Conduct website (http://my.harris.com/bus-conduct/brochures/corr_web.pdf; http://my.harris.com/bus-conduct/brochures/IB_GlobalAnticorruptionLaws_Web-JP.PDF);
- ▲ Policy [G-37, International Gifts and Hospitality](#), and Policy [G-39, International Intermediaries](#).

If you have questions related to bribery and corruption, you can contact your manager, Ethics Advisor or the Director of Business Conduct.

Deciding whether or not it is appropriate to give, receive or exchange gifts or participate in business-related hospitality is not always simple, but you can generally follow these guidelines:

What is permitted...

- ▲ Providing occasional meals, modest entertainment, mementos and novelties of nominal value while conducting business with persons who are not employed by governments or government agencies; and
- ▲ Accepting occasional ordinary and customary business meals, gifts, mementos and novelties of nominal value from others.

What may be permitted...

It may be lawful and customary in some countries for employees of companies that do business with each other to provide gifts or mementos as a natural and

expected form of conducting business. In these types of situations, a gift or memento may be given or received if the following conditions are met:

- ▲ It cannot be construed as a bribe in violation of any law;
- ▲ It will not cause embarrassment to or discredit the company if disclosed; and
- ▲ Approval has been obtained from Harris management.

Any gifts or mementos will be given in the name of the company and any gift or memento of more than nominal value that is received by a Harris employee should be politely declined or returned. If it can't be returned, it should be turned over to management and will become company property.

What is not permitted...

- ▲ Giving or offering more than nominal gifts to customers, other individuals or organizations that have business relationships with the company;
- ▲ Engaging in any conduct, including offering or accepting a gift, meal, entertainment, etc., which raises even the appearance that you are engaging in an inappropriate course of conduct; and
- ▲ Receiving or soliciting gifts from suppliers or potential suppliers of products and services to the company or from other organizations or individuals that have business relationships with the company,

other than occasional ordinary business meals, gifts, mementos and novelties of nominal value.

Additionally, if a gift is offered from a vendor or supplier that you are negotiating with, you can't accept it, regardless of value.

Government Employees and Officials

With some limited exceptions, many countries generally prohibit companies like Harris from providing gifts to government employees, including elected officials and their staff. As a result of these rules, no director, officer, employee or agent of Harris may provide anything of value to government employees, including elected officials and their staff, without prior coordination with Harris Legal Counsel or the Government Relations Office.

Here are some guidelines to help you in working with government employees whether inside or outside of the United States:

- ▲ Harris employees must not give, or even offer to give, government employees any entertainment, meal or gift, regardless of the value, when that act would be a violation of the rules or regulations of the government employee's agency;
- ▲ Generally, most government agencies permit their employees to accept business courtesies, including mementos, coffee, donuts or similar light refreshments. In the U.S. the retail value of such courtesies shall be less than US\$20;

QUESTIONS AND ANSWERS

Q: A golf tournament is being sponsored by a vendor. The cost of the tournament is US\$75, but almost every entrant will receive a prize in excess of the entry fee. May I play and keep any prize I might win?

A: Before you participate in this type of event, you should obtain your manager's approval or discuss your participation with your Ethics Advisor. It is necessary to understand who will be participating in the tournament and the purpose of the tournament. If it is an event attended by representatives

from a number of companies or, for instance, it is intended as a marketing event, then it likely would be permissible to participate and keep any prizes.

[Click here for more frequently asked questions for Government Operations.](#)

[Click here for more frequently asked questions for Commercial Operations.](#)

- ▲ Employees may not make loans, guarantee loans or make payments to or on behalf of government employees;
- ▲ Employees may entertain relatives or close friends employed by government agencies, but that entertainment should not be related in any way to company business. Harris will not provide

reimbursement for social entertainment of government employees; and

- ▲ The offering or furnishing of money, goods, services or anything of value to a government official in exchange for official action or as a result of official action is strictly prohibited.

ALWAYS REMEMBER

It is difficult to define "nominal." Subject to the rules of the offering company, a Harris employee generally may accept a gift, a memento or an invitation to an entertainment venue where the value is less than US\$20. Depending on the situation, the country you are in, currency valuation or local customs, a gift of a higher value may be viewed as nominal. If you have any doubts about whether a particular gift or hospitality may be improper, ask your Ethics Advisor or the Legal Department.

You can usually offer or accept...

- ▲ Small promotional gifts such as coffee mugs, t-shirts or pens; and
- ▲ An occasional business lunch or dinner within policy limits.

You can never offer or accept...

- ▲ Cash or cash equivalents such as gift cards, etc.;
- ▲ Gifts or hospitality that are excessive in value;
- ▲ Any gifts or hospitality that you know or believe may violate the recipient's gifts and hospitality policy;
- ▲ Any gifts or hospitality that could create embarrassment for the company; or
- ▲ Gifts that are solicited.

It is important to use good judgment and to ask an Ethics Advisor or the Director of Business Conduct if you are in doubt as to what is appropriate under our Code of Conduct.

FOR MORE INFORMATION

If you have questions related to gifts, entertainment and hospitality, you can contact your manager, Ethics Advisor or the Director of Business Conduct. You can also review Policy [G-37, International Gifts and Hospitality](#).

Fair Competition

We are committed to competing fairly and conducting our business in compliance with all applicable competition and antitrust laws. Generally, antitrust and competition laws prohibit any activity that may improperly reduce or inhibit competition. Violations of the antitrust and competition laws can lead to substantial civil and/or criminal penalties for Harris and for the individuals involved.

Antitrust and competition laws are often complex, but we all must have basic knowledge of the types of behaviors that can violate these laws. You are expected to be familiar with the principles of the antitrust and competition laws that apply to your job.

[Click here for frequently asked questions on Antitrust and Anticompetiton.](#)

Agreements with Competitors

Competition, antitrust laws and our policies prohibit agreements or understandings among actual or potential competitors to:

- ▲ Fix or control pricing;
- ▲ Allocate products, territories or markets; or
- ▲ Limit the sale or production of products.

To avoid possible violations of competition and antitrust laws, you must not discuss these matters with representatives of other companies.

Pricing Activities

Competition and antitrust laws also govern our relationships with customers and suppliers. We must never attempt to monopolize a market or control prices. Some examples of behaviors to avoid with our customers and suppliers include:

- ▲ Agreements concerning the price at which a product will be resold;
- ▲ Boycotting certain suppliers or customers;
- ▲ Pricing products or services unfairly; and
- ▲ Agreements to sell a product made on the condition that the customer purchase another product.

Competitive Information

We must always gather information about competitors legally and ethically. We must never obtain confidential information of a competitor through fraud, misrepresentation or improper means. If you become aware of competitive information you believe was not intended for your review, contact your manager, Ethics

Advisor or the Director of Business Conduct for guidance, even if you received this information unintentionally.

We also respect and protect our competitors' intellectual property, trade secrets and confidential information and will not attempt to acquire information about our competitors illegally or unethically.

You must never:

- ▲ Ask a current or former employee of one of our competitors to violate their confidentiality obligations;
- ▲ Hire someone from a competitor to obtain trade secrets or confidential information; or
- ▲ Misrepresent yourself or the company, or attempt to disguise your motives when gathering competitive information.

Suppliers

We choose our suppliers based on objective criteria, such as quality of service and the business benefits to Harris and our customers. We must never use our positions to get personal benefits from current or prospective suppliers. We treat our suppliers with fairness and professionalism and communicate openly and honestly with them to understand their problems and develop mutually satisfactory solutions.

OUR COMMITMENT TO OUR SUPPLIERS



Suppliers are a vital part of our business.

Our goal is to develop and maintain mutually beneficial relationships with suppliers who share our commitment

to achieving increasing levels of customer satisfaction through continuing improvements in quality, service, timeliness and cost. Our dealings with suppliers are fair and honest and embrace our values and principles.

QUESTIONS AND ANSWERS

Q: I was at a trade association meeting and attendees began discussing the state of the market and where people expect prices to go. Is it all right for me to participate in these discussions?

A: No. You should not participate in or remain at a meeting of competitors at which current or future prices or manufacturing costs are discussed. You should clearly voice your objection to the discussions, leave the meeting and promptly report the incident to Harris Legal Counsel. In some cases, a trade association may legally collect and disseminate historical information about industry sales volume, industry revenues and industry production capacity which does not reflect company-specific data. To make sure you are complying with the antitrust and competition laws and Harris policy, you should consult with Harris Legal Counsel before providing this type of information to or obtaining it from a trade association.

Q: We just received a Request for Proposal for a multimillion-dollar business opportunity. It appears that Harris will have a better chance of winning if we team with another company. The one we have in mind is a competitor. How can we make sure that we negotiate a teaming agreement that benefits Harris and minimizes our risks?

A: Harris Legal Counsel can help you assess and minimize risk and draft a legally compliant agreement. Before you even approach a potential teammate—especially a competitor—ask Harris Legal Counsel to evaluate the relationship to ensure proper handling of antitrust and competition issues and protection of Harris proprietary information.

ALWAYS REMEMBER

You must never:

- ▲ Agree with a competitor about prices or set prices in consultation with a competitor;
- ▲ Communicate directly or indirectly with a competitor about prices either we or they charge for products or services;
- ▲ Agree with a competitor to divide markets;
- ▲ Agree with a competitor to set the terms or fix the outcome of a bidding process, nor should you discuss bids with customers; or
- ▲ Agree with others not to deal with another person or business.

FOR MORE INFORMATION

If you have questions related to competition or antitrust laws or policy, you can contact your manager, Ethics Advisor, the Director of Business Conduct or Harris Legal Counsel.



Communicating Company Information and Social Media

Speaking Responsibly About the Company

We are committed to providing accurate and timely information about our company to the public, the media, our shareholders, government officials and agencies in compliance with all applicable regulations. This helps us maintain integrity with our external stakeholders, which in turn strengthens our company's reputation. Since accurate information is crucial, only designated personnel are authorized to speak on the company's behalf or communicate with the media and financial analysts. If you have questions regarding communicating on behalf of the company or are asked to speak on behalf of the company, you should first contact the Corporate Communications Department.

Social Media

We acknowledge that the Internet provides us with the potential to create important connections and share valuable information using a wide variety of social media tools like Facebook, Twitter, or personal websites or blogs. At the same time, these tools also create risks to you and the company, such as the potential disclosure of confidential information and concerns related to privacy. We also need to make sure that use of these tools does not affect our job performance. We encourage all employees to use social media responsibly. Remember that there is no such thing as

"delete" on the Internet, so you should think before you post. If you use social media to connect with others and identify yourself as a Harris employee, you must ensure that others are aware that opinions expressed are your own and not necessarily those of the company. Please also exercise care and good judgment to protect our interests and reputation.

ALWAYS REMEMBER

We must exercise caution when using social media to ensure we never disclose confidential information. This can be technical business information, financial information or internal business communications of Harris or of a third party who has provided this information to us under a Confidentiality Agreement.

FOR MORE INFORMATION

If you have questions related to communications or social media, contact your manager, Ethics Advisor or the Director of Business Conduct. You can also review Policy [G-5, Corporate Communications](#), Policy [G-28, Internet and Computer Resources](#), Policy [G-30, Investor Relations Disclosure](#), and Policy [G-33, Social Networking](#).

QUESTIONS AND ANSWERS

Q: A colleague keeps asking to "follow" me on one of my social networking accounts. I don't really want to have work colleagues following me on my social media site, but I'm not sure how to let them know this without offending them. What can I do?

A: You could be direct and simply say that you don't want to mix your personal and work life. Fellow employees should

understand your preference to maintain privacy. Some social media sites also allow you to control privacy settings restricting who is able to view different information on your page or site. Keep in mind, however, that privacy settings can change without your knowledge. Remember that you can always contact your manager, Ethics Advisor or the Director of Business Conduct if you need guidance.

Material Information and Insider Trading

As employees, we often have access to confidential information about Harris and our current and prospective customers, suppliers and other companies with whom we do business. We must use or disclose this type of information only for legitimate business purposes and must never use confidential and/or material nonpublic information for personal gain or advantage.

Insider trading laws and our policies prohibit employees who are aware of material nonpublic information relating to Harris or companies with which we do business from buying or selling their securities, including stock, bonds, options and other derivatives. It is also against the law and our policy to pass this type of information on to a family member, others, or to recommend trades on the basis of material nonpublic information. Employees who have material information may not trade in the company's securities until the information has been disclosed broadly to the marketplace and the public has had time to fully absorb the information (generally 24 hours following a press release or public filing). Violating the insider trading laws can lead to substantial civil and/or criminal penalties.

Material information is any information that a reasonable investor would likely consider important in making a decision to buy, hold or sell securities. While it is not possible to list all types of information that might be "material," information related to the following subjects is usually material:

- ▲ Financial information (including sales, orders or income results);
- ▲ Financial projections, forecasts or budgets;
- ▲ Mergers, tender offers or acquisitions of other companies or major purchases or sales of assets;
- ▲ Awards or cancellations of major contracts;
- ▲ The gain or loss of a significant customer or supplier;
- ▲ Changes in senior management;
- ▲ A change in dividend policy, the declaration of a stock split or an offering of additional securities;
- ▲ Development of significant new products or technologies;
- ▲ Developments in major litigation or government investigations;
- ▲ Write-downs or restructuring charges; and
- ▲ Major transactions or negotiations with other companies regarding joint ventures, alliances or licensing agreements.

Officers, Director-Level and Above and Finance Employees

Additional trading restrictions apply to members of Harris' Board of Directors, officers and employees at the director-level and above, as well as any other employees who are aware of or have access to material inside financial information relating to Harris' quarterly or annual financial results. These employees are specifically prohibited from directly or indirectly trading in Harris securities during the period that starts on the 15th day of the 3rd month of a fiscal quarter and continues for one full trading day (24 hours minimum) after the public release of our quarterly or annual financial information.

ALWAYS REMEMBER

If you or a spouse or partner are planning to buy or sell Harris securities, or the securities of another company with whom we do or want to do business, and believe you may have material nonpublic information or are unsure whether restrictions apply to you, consult with Harris Legal Counsel before initiating any transaction.

FOR MORE INFORMATION

If you have questions related to material information or insider trading, you can contact your manager, Ethics Advisor or the Director of Business Conduct. You can also review Policy [G-2, Conflicts of interest and Outside Activities](#), and Policy [G-23, Material Non-Public Information and Insider Trading Policy](#).



QUESTIONS AND ANSWERS

Q: Through my dealings on behalf of Harris, I've become aware of financial information indicating that one of the company's suppliers is in better financial condition than most people realize. I want to purchase some of the supplier's stock. May I do so?

A: You may not purchase this stock until the supplier's financial information is known to the public. Information of this sort may have been provided to Harris in confidence by the supplier to help Harris determine how to meet

the supplier's needs. Using this information for personal purposes or disclosing it to others is a violation of Harris' policy and is illegal.

Q: I am aware that a large order for Harris' products has been placed by a customer, but has not yet been announced. May I purchase Harris stock based on that information?

A: No. This is a violation of Harris policy and a potential violation of insider trading laws.

Political Activities and Lobbying

Corporate Political Activities

U.S. law and our policies prohibit use of company funds or assets for support of candidates for federal office. Where political contributions of company funds or assets are permitted, you must secure the required advance approvals from the Government Relations Office and an appropriate level of management before any contribution is made. In addition, political contributions must not be treated as expenses for tax purposes unless the law in the applicable jurisdiction clearly permits the deductions to be taken. Tax questions should be referred to the Corporate Tax Department.

Personal Political Activities

While we encourage all employees to participate as individuals in the political process, you must conduct these activities on your own time and using your own personal resources. You cannot actively advocate, endorse or otherwise promote a political or social cause or position in your capacity as a Harris employee without prior authorization from the Harris Government Relations Office. You must also comply with Harris policies relating to your personal advocacy and political activity in your workplace and, in limited circumstances, to your personal political contributions. You should never use Harris resources to assist your personal political activities or give the impression that Harris supports your personal position.

The U.S. imposes additional restrictions on the personal political contributions and personal fundraising activities of directors, officers, employees at the director-level and above and other “Covered Persons” in order to protect our current and future state and local contracts. “Covered Persons” include any employee in a sales, business development, contracts, subcontracts or contract administration position involving or potentially involving state and local government contracts. Under our policies, before a Covered Person or a Covered Person’s spouse/ domestic partner or minor child makes a contribution, solicits contributions or engages in fundraising for a state or local candidate, political action committee or political party committee, the Covered Person must follow the process described in Policy [G-41, Political Contributions and Advocacy and Social Responsibility](#), and obtain all required pre-approvals.

Lobbying

Lobbying is a highly regulated activity in many countries and local jurisdictions. Lobbying includes attempts to influence elected officials and government officials and employees with respect to legislation, regulations, programs, policies, nominations and other types of similar actions. You must always work with the Government Relations Office before attempting to influence the actions of any government official or employee or hiring an outside lobbyist to work on behalf of Harris.



ALWAYS REMEMBER

No company funds or resources can be used for contributions to, or in support of, candidates for U.S. federal office. In order to comply with all applicable lobbying laws, you must also consult the Harris Government Relations Office before you begin any lobbying activities or hire an outside lobbyist on behalf of Harris.

FOR MORE INFORMATION

If you have questions related to political activities or lobbying, you can contact your manager, Ethics Advisor or the Director of Business Conduct. You can also review Policy [G-41, Political Contributions and Advocacy and Social Responsibility](#), and Policy [G-47, Engagement and Retention of State and Local Government and Public Affairs Consultants, Advisors and Lobbyist/Gifts and Contributions to or on Behalf of State and Local Officials](#).

QUESTIONS AND ANSWERS

Q: Can I purchase tickets to a political fundraising event for a Congressman with my Harris company credit card?

A: No. You should never make any political contribution in support of a candidate for federal office on behalf of Harris or using company funds.

Q: A coworker and I want to stay late at the office and make telephone calls on behalf of a political candidate we are supporting. May we do that?

A: No. You may not use company resources, such as company facilities or office telephones, to conduct activities in support of political candidates.

Our goal is to be a responsible corporate citizen. This includes support of appropriate civic, community, educational, charitable and business activities; respect for the environment; and the encouragement of Harris employees to practice good citizenship and community support. Our greatest contribution to our communities is to be successful so that we can maintain stable employment and create new jobs.



Commitment to Quality

We believe that the best way to build healthy, long lasting customer relationships is to provide them with superior products and services. We are passionate about our customers' success and strive to exceed their expectations every day. This includes complying with all internal quality controls and any laws or regulations governing our products and services. We must also always follow requirements specified in our customer contracts.

Environmental, Health and Safety

Harris is committed to protecting the health and safety of our employees, customers, visitors and the public. We all should strive to work safely and prevent occupational illnesses and injuries. We should also conserve resources, reduce waste and minimize the environmental impacts of our activities, products and services in ways that contribute to the success of our business.

We must comply with all government regulations relating to the environment, employee health and safety that apply to our facilities and products. Each of us must also comply with the programs, procedures, internal controls and training that the company has established to meet or exceed these requirements.

If you witness or hear of any violations of these regulations, policies or procedures, you should immediately report it to your manager, Ethics Advisor, the Director of Business Conduct, Director of Environmental, Health and Safety or Harris Legal Counsel.

Violence-Free Workplace

As part of our commitment to ensuring the safety of our employees, we strive to maintain a violence-free workplace. Weapons are not allowed in the workplace.

Drug-Free Workplace

You must never be under the influence of drugs or alcohol that might impair your ability to do your job and/or put other employees at risk. We prohibit the inappropriate use of alcohol and legal drugs and the use, possession or sale of illegal drugs on company property or whenever you are at work or represent the company. We also prohibit the consumption of alcohol during working hours or on company property unless specifically approved or as part of an approved event.

ALWAYS REMEMBER

We are committed to compliance with all applicable environmental, health and safety laws and to preventing occupational illnesses and injuries, conserving natural resources and minimizing waste. We need to ensure that our subcontractors, suppliers and consultants are aware that we expect them to meet the same standards.

FOR MORE INFORMATION

If you have questions related to product quality or environmental, health and safety, you can contact your manager, Ethics Advisor or the Director of Business Conduct. You can also review Policy [G-24, Quality](#) and Policy [G-17, Environmental, Health and Safety](#).

QUESTIONS AND ANSWERS

Q: How should I report an injury that occurs at work?

A: Each Harris location is required to have an emergency reporting procedure to ensure medical assistance can be provided in a timely manner. Please contact your EHS representative or manager for the procedure your location follows and report all injuries to your manager immediately. If your manager is not available report the injury to your EHS representative or to security (where available).

[Click here for more frequently asked questions on Environmental, Health and Safety.](#)

Q: How do I know if I'm doing something that's regulated by environmental, health and safety laws?

A: Your EHS coordinator, the EHS Department or Harris Legal Counsel can assist you in determining whether your day-to-day activities, products or services are subject to EHS regulations or if you require specialized training. Contact any of these individuals or departments if you have a question. In many cases, specific EHS compliance training may be helpful and/or required.

CUSTOMERS

EXCEEDING EXPECTATIONS.

Our goal is to exceed our customers' expectations every day by providing high-quality, technologically superior products and services on time and on budget. Our relationships with customers are forthright and honest and are conducted in a manner that builds trust and confidence. When customers buy our products or services, they can be confident that they will receive a reliable product and service that will help them take their business to the next level.

Fair and Ethical Sales Practices

We expect our customers to make decisions to buy our products and services on the basis of quality, service, delivery and price. We believe in competing in a fair and open marketplace and pursue new business through the superior competitiveness of our products and services. You should always speak truthfully about Harris and our products and services and should not misrepresent their features or condition. You should never make statements about competitors that you know are not true.

Doing Business With Governments

Our business standards apply to all of our business partners. If you are working on a project involving government customers in any of our operations around the globe, you must also be aware of and comply with the additional complex laws, regulations and rules that apply. You also need to make sure that our subcontractors, suppliers and consultants are aware of the applicable requirements.

If you have any questions about these laws, rules or regulations, you should contact Harris Legal Counsel for assistance. You should seek advice well in advance of any activity that could be

perceived as a possible violation of the law. Vigilance and informed precaution will help ensure the company's ability to properly pursue government contract opportunities.

Procurement Integrity

We follow the procedures our customers have put in place for awarding contracts. This is particularly important when working with the specific and complex rules that apply to government contracts. We must never do anything to compromise the integrity of the bidding process for government contracts. For example:

- ▲ You must not ask for unauthorized disclosures of procurement-sensitive or security-classified information, including any competitor bid or proposal information or any material used to evaluate competing bids.
- ▲ You must not offer anyone involved in the procurement process any money, gratuity or anything of value or offer or discuss any business opportunities with them.

Kickbacks and Commissions

We cannot solicit or provide anything of value for the purpose of obtaining or rewarding favorable treatment from any of our government customers, including influencing a procurement action. This type of action violates kickback laws. We also need to avoid any actual or potential conflict of interest in our dealings with government customers. In some countries, like the U.S., you cannot offer any fees or commissions that are conditioned on success in securing a U.S. government contract. Before offering any fees or commissions based on success in securing a non-U.S. government contract, you should seek advice from Harris Legal Counsel.

Billing, Pricing and Contract Compliance

We must be clear, accurate, timely and honest in all aspects of our billing and our prices must be accurate and only reflect our costs, level of effort, market conditions and other relevant factors.

Under the U.S. Truth in Negotiations Act, if you are involved in negotiation of contracts with the U.S. government or in U.S. government procurement, you must be sure that all cost and pricing data provided to the government is current, accurate and complete, and that all statements, communications and representations you make are accurate and truthful. Also, if you are involved in selling or offering commercial products or services to the U.S. government under the General Services Administration (GSA) schedule or Multiple Award Schedule (MAS), you must be familiar with and comply with all applicable contracting requirements.

We deliver the materials and products and perform the quality control and testing as promised under our government contracts. Any deviation from the contract terms could subject Harris to liability for breach of contract, violate product substitution laws and lead to criminal prosecution. You cannot substitute materials or products or change the testing requirements or quality controls specified in a government contract without first obtaining the required Harris management approval and following all applicable government procedures.

QUESTIONS AND ANSWERS

Q: My manager asked me to charge my time to an incorrect charge number. What should I do?

A: First, make sure that your manager knows what you are really working on so that there is no misunderstanding about the work you are doing. If that doesn't resolve the problem, you should seek advice from your next level manager, your Ethics Advisor, the Director of Business Conduct or Harris Legal Counsel.

Q: An employee of a government customer has asked me to review a copy of a competitor's proposal. May I provide this assistance to the customer's employee?

A: You may not assist a government customer employee in reviewing a copy of a proposal submitted by a competitor unless Harris receives authorization in writing from the Procuring Contracting Officer or other authorized individuals, confirming the action does not violate any

procurement laws and it is reviewed and approved in advance by Harris Legal Counsel.

Q: One of our government contracts requires a test during the early stage of production that duplicates part of a test required during a later stage of production. The earlier test is clearly a waste of time and money and will delay delivery. Can we skip the extra test?

A: No. Since the contract requires that both tests be performed, no change in testing or quality controls can be made without first informing and obtaining the approval of the appropriate level of Harris management, as well as the approval of our customer. To knowingly deliver a product that fails to meet the contract specifications or testing requirements, without specific prior approval from the customer, could be considered fraud and a violation of law.

Claims and Proposals and Proper Time Charging

Our reputation for transparency and accuracy in our bidding and pricing is one of our most valuable assets. For that reason, you must never knowingly submit or participate in the submission of any claim, bid, proposal or any other document that is false or fraudulent. You must also ensure that all hours worked are accurately and promptly recorded to the appropriate account or program cost objective consistent with your business's accounting procedures. You must never falsify timecards or other cost records. Violations of these requirements are grounds for immediate termination of employment and could result in criminal prosecution of both Harris and any employee involved.

Mandatory Disclosures

Regulations require Harris, under certain circumstances, to promptly report to a government customer suspected instances of fraud, conflicts of interest, bribery, illegal gratuities, customer overpayments and some errors in billing and pricing. The government can impose serious penalties on us if we fail to disclose these types of misconduct. If you suspect any misconduct involving a government contract, promptly contact your Ethics Advisor, the Director of Business Conduct or Harris Legal Counsel for appropriate action.

ALWAYS REMEMBER

We compete fairly and properly for all business opportunities. You must not disclose any procurement-sensitive or classified information relative to any government procurement activity or solicit, obtain or disclose any competitor bid, proposal information, or proprietary or source selection information.

Hiring Former Government Employees

In many of the countries in which we do business, laws impose limits on our ability to hire certain current or former high ranking government employees or those with significant procurement responsibilities—or even engage in any discussions with them about potential employment. Former government employees may also be restricted in the type of work they can perform for us. Even when there are no hiring restrictions with regard to a former government employee, the appearance of an impropriety must be considered. Because of the complexity of these issues and the laws and the severe penalties for violations of those laws, only the Human Resources Department, with Harris Legal Counsel's assistance, is authorized to conduct employment discussions with current or former government employees.

Security Clearances

If you are required to obtain and maintain a security clearance, you are expected to be aware of all of the responsibilities and obligations associated with your respective clearance. Any questions or concerns should immediately be reported to Security.

FOR MORE INFORMATION

If you have questions related to doing business with governments, you can contact your manager, Ethics Advisor or the Director of Business Conduct. You can also review Policy [G-45, Global Procurement Policy](#) and Policy [G-42, Compliance With the Federal Acquisition Regulation Mandatory Disclosure Requirements](#).

The Harris Policy Statement on [Conduct in Contracting with the United States Government](#), contains specific guidelines and requirements.

Exports, Imports and Trade Compliance

Exports and Imports

We conduct all of our international business in compliance with the export laws and regulations of the countries in which we do business. These laws regulate, and in some instances prohibit, the export of certain commercial products, dual-use items, strategic goods, defense articles and their related technologies and the furnishing of defense services. They may also apply to the re-export of goods and services.

Under U.S. law, an export can occur whenever equipment or technical data is released or made available to a “foreign person,” whether within or outside the U.S. A foreign person includes everyone who is not a U.S. citizen or permanent resident. Exports of technical data can take place in a variety of ways, including document shipments, proposals

to foreign customers, technical publications and presentations, demonstrations and promotional literature, trade and air shows, and plant tours. Before you disclose technical data to a foreign person or to anyone outside the U.S., travel internationally or host a foreign person — including a Harris employee from another country at your Harris facility — you need to fully understand any applicable export requirements and limitations.

In addition to export laws and controls, most countries also have laws and controls governing the import of products, services and technologies. Under these laws, only certain goods are allowed to enter the importing country and the correct amount of duties and taxes must be paid. If your work involves imports, you are expected to understand the applicable requirements. Each business has a Trade Compliance Manager who can assist in answering questions about trade controls.

QUESTIONS AND ANSWERS

Q: Is it true that hardware or technical data must physically pass beyond a country’s border for an export to take place?

A: No. An export can take place in any location whenever technical data or hardware is made available to any foreign person. Proper export authorization must be obtained before you provide export-controlled items or technical data to foreign persons, whether physically, in writing, visually or orally. Personal meetings, telephone conversations and email could result in an illegal export of technical data. Before having a meeting or telephone conversation about technical data with a foreign person, check with your Trade Compliance Manager or Harris Legal Counsel.

Q: In order to expedite the delivery of products and technical drawings to a foreign customer, I propose to hand-carry or have other employees traveling to our customer’s facility hand-carry these products and drawings in luggage or briefcases. Would this be a problem?

A: Yes. This could violate export laws, import laws and Harris policy. It could cause embarrassment, delays, seizure of the products and drawings, fines and loss of export or import privileges. Contact your Trade Compliance Manager or Harris Legal Counsel before hand-carrying Harris products or technical data across borders into another country.

Anti-Boycott Laws

We do not enter into any agreements or provide information that could be construed as furthering boycotts that are restricting international trade practices or are illegal. These activities could violate anti-boycott laws and result in criminal or civil penalties for Harris and the employees involved. Because the mere receipt of a request to engage in illegal boycott activity may require a report to the U.S. government, you need to be vigilant when you review transaction documents and must immediately preserve any documents containing this type of request.



Restricted Countries

Certain countries may be subject to economic sanctions and we may be prohibited from doing business with them. We must ensure that we comply with all applicable laws and regulations prohibiting doing business within certain countries.

ALWAYS REMEMBER

We should always conduct business in compliance with laws governing trade embargos and sanctioned countries. If you are concerned we could be conducting business in a way that violates any of these laws, you should contact your Trade Compliance Manager or Harris Legal Counsel immediately.

FOR MORE INFORMATION

If you have questions related to exports, imports or trade compliance, you can contact your manager, Trade Compliance Manager, Ethics Advisor or the Director of Business Conduct. You can also find helpful information and resources posted on the [Trade Control Website](#).

QUESTIONS AND ANSWERS

Q: A Harris business received an order from a country that has imposed an economic boycott on another country in violation of U.S. anti-boycott laws. The potential customer's purchase order contained a statement to the effect that the supplier agrees not to procure materials from any blacklisted country. May the business accept the order?

A: No. Accepting this order would subject Harris to criminal and tax sanctions. It is Harris policy to comply with anti-boycott laws. You should contact your Trade Compliance Manager, Harris Legal Counsel and/or the Corporate Tax Department as soon as possible to make sure we comply with all legal requirements.

RESULTS

FOCUSED ON DRIVING BUSINESS GROWTH AND SHAREHOLDER RETURNS AND REWARDING PERFORMANCE.

For shareholders—the owners of our company—our goal is to create sustainable, long-term shareholder value.

Integrity of Our Business Records and Record Management

Accurate Books and Records

Our books and records must be accurate, complete, reliable and timely. Each of us is responsible for making sure that the information we process and the records we create in our jobs are complete, accurate and timely. We must prepare and review all transactions in compliance with applicable laws and Harris policies and procedures.

We should always comply with accounting standards, internal controls and audit practices and never establish any undisclosed or unrecorded funds or accounts. Harris' financial books, records and statements must always:

- ▲ Accurately reflect transactions of the company;
- ▲ Contain no false or misleading statements or entries;
- ▲ Properly account for all assets and liabilities; and
- ▲ Properly document business expenses in compliance with established policies and procedures.

Harris is required to provide reports, financial statements and other documents to shareholders and the public. We are committed to full, fair, accurate, timely and understandable disclosure in the reports, financial statements and documents we file with or submit to the U.S. Securities and Exchange Commission (SEC) and in other public communications. If you are involved in the preparation of these filings and communications, you must ensure that the information you supply is accurate and complete.

QUESTIONS AND ANSWERS

Q: One of our customers asked me to change the date on an invoice to next quarter. He said it would really help him out with his budget. Is this okay to do?

A: No. Sales invoices must always accurately reflect the date the sale took place. Changing the record would violate our obligation to maintain accurate and honest financial records.

Q: Our department has spent nearly all of our travel budget. Our customer asked me to travel to their site for an important meeting, and I want to charge an account that does have funding, but is not for travel. May I do so?

A: No. Your department accounts should reflect the true nature of the travel costs and record them appropriately.

Q: I understand that I create business records as a regular part of my job, but how do I know what I need to keep and what I can discard or destroy?

A: We all need to be familiar with Harris' records management policies and guidelines which provide detailed information on:

- The types of records you must retain;
- The length of time you need to retain specific records; and
- When and how you should dispose of—and in some cases, destroy—records.

Each of us creates business records as a regular part of our job. We need to make sure that the records we create and use in our jobs reflect the true nature of whatever event we are recording. You must never be dishonest or deceptive in the records and reports you prepare including operational data, time sheets, expense reports and reports on your own performance. If you notice a mistake or an error in a record, you should report it to your manager as soon as possible. You should also use care in all of your communications, including emails and texts. Even your emails and telephone communications are considered to be business records.

Each of us is also responsible for retaining or destroying business records under our control in accordance with applicable Harris records management policy. In some situations involving litigation or investigations, you may be required

to retain some records beyond the normal period. It is never permissible to alter, falsify, conceal or misrepresent company records.

Concerns Regarding Accounting, Financial Reporting and Related Matters

If you have any concerns about potential accounting matters, internal accounting controls or auditing matters, financial reporting or disclosure matters that you believe constitute or will constitute a violation of law relating to securities or fraud at Harris, you may report your concerns to the Vice President of Internal Audit, the Director of Business Conduct or by contacting the Adviceline, which you can do anonymously. Potential accounting matters include:

- ▲ Fraud or deliberate errors in the preparation, evaluation, review or audit of any Harris financial records;





- ▲ Fraud or deliberate errors in the recording and maintaining of Harris financial statements;
- ▲ Deficiencies in or noncompliance with the company's internal accounting controls including attempted or actual circumvention of internal controls;
- ▲ Misrepresentation or false statements to or by a senior financial officer regarding a matter contained in the financial records, financial reports or audit reports of the company;
- ▲ Deviation from full and fair reporting of the company's financial condition, results of operations or financial statements; and
- ▲ Violations of securities laws or regulations or any other laws relating to fraud against shareholders.

ALWAYS REMEMBER

If you have a good-faith complaint or concern regarding potential accounting matters at Harris, you may submit your concern, without fear of retaliation of any kind, to:

- ▲ The Vice President of Internal Audit at 1-321-724-3166
- ▲ The Director of Business Conduct at 1-321-724-3023
- ▲ The Adviceline 1-855-477-4272, which can be anonymous. If you are outside the United States, go to AT&T World Wide Connect <http://www.business.att.com/bt/access.jsp>, to obtain your country access number and you will be prompted by the AT&T tone to dial the Harris Adviceline number.
- ▲ WEB feedback form at: http://my.harris.com/bus-conduct/feedback_form.asp

You also may report concerns regarding accounting or auditing matters to your manager, members of the Harris Legal Department or Ethics Advisors.

Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation. Retaliation is strictly prohibited and will not be tolerated.

FOR MORE INFORMATION

If you have questions related to financial integrity or record management, you can contact your manager, Ethics Advisor or the Director of Business Conduct. You can also review [Procedures for Reporting and Responding to Complaints or Concerns About Accounting and Auditing and Certain Other Covered Matters](#), Policy [G-8, Internal Auditing](#) and Policy [G-11, Domestic Corporate-wide Records Retention Policy and Guidelines](#).

INNOVATION

DEMONSTRATING INITIATIVE AND CREATIVE THINKING.

Protecting Company Assets

Use of Company Resources

Harris provides business tools, such as computers, Internet access, telephones and a wide variety of other equipment, to enable us to be efficient and to contribute to the company's success. We are all responsible for safeguarding Harris property, equipment and other assets. These resources include Harris' time, material, equipment, information and electronic systems (including email). All Harris resources should be used only in accordance with Harris policies and procedures. Abusive, unreasonable or other inappropriate use of company resources is prohibited. These rules also apply to any resources that our customers or suppliers have entrusted to us. We must use these resources in accordance with the customer or supplier instructions.

Computer and Internet Use

We must always be careful with the computers and electronic systems we use in our jobs and comply with Harris' security and password procedures, especially when working remotely.

Using our systems inappropriately can be harmful to Harris' reputation. You should never use Harris' computers or communications systems for:

- ▲ Activities that are against the law;
- ▲ Personal business activities without prior approval;
- ▲ Publicly commenting or speculating on Harris' performance, policies or actions if it might look like you are speaking on Harris' behalf; or
- ▲ Posting confidential information to any public Internet site or making any other unauthorized disclosures.

We must also be careful not to install software on the devices we use in our jobs without obtaining proper approval and not to open attachments that come from an unknown source.

QUESTIONS AND ANSWERS

Q: I am active in community affairs and volunteer my time and effort to such activities. May I use company equipment to make copies of information pertaining to these activities?

A: While the company encourages you to participate in community affairs, it would be a violation of company policy to use company equipment for these purposes, unless your manager or Ethics Advisor have approved it in advance.

[Click here for more frequently asked questions on the proper use of Company, Customer and Supplier Resources.](#)

Q: Can Harris monitor my Internet use and block certain websites?

A: Harris monitors its computing and communication systems as permitted by applicable law. Users are expected to use good judgment and comply with Policy [G-28, Internet and Computer Resource Use](#), and Policy [G-33, Social Networking](#). Monitoring is performed to identify prohibited nonbusiness-related activity and inappropriate or offensive Internet website access. Software technology is in place to block access to websites that are either clearly inappropriate or offensive or that have a low probability of being business related.

ALWAYS REMEMBER

The company's information and communication systems and devices, and the information and data on them, are provided to us so we can do our jobs. While occasional personal use of these systems and devices is acceptable in many of our locations with approval by your manager, done responsibly and in compliance with applicable policies, remember to use your best judgment.

FOR MORE INFORMATION

If you have questions related to protecting company assets or about whether certain information is considered confidential you can ask your manager, Ethics Advisor, the Director of Business Conduct or Harris Legal Counsel. You can also review Policy [G-28, Internet and Computer Resource Use](#) and Policy [G-33, Social Networking](#).

Confidential Information and Intellectual Property

Confidential Information

We are all required to use confidential information, whether it is written, electronic or in any other form, solely for legitimate business purposes. You must never use or disclose confidential information you learn in your job for personal reasons, for your personal benefit or for any purpose other than for the benefit of Harris. Confidential information is a broad term and includes any confidential, proprietary or trade secret information, whether or not marked or otherwise designated as confidential.

You should always maintain confidential information for its intended use and take all steps necessary to prevent unauthorized use, disclosure or access to this information. This includes information that belongs to third parties and/or that is protected under a nondisclosure agreement. If you have access to confidential information, you must not disclose it to anyone, including coworkers and family members, who is not entitled to it. Upon leaving the company, you must not take any confidential information belonging to the company or others with you and must continue to maintain the confidentiality of confidential information.



Intellectual Property and Software

Part of our obligation to safeguard Harris' assets and confidential information includes a responsibility to understand and protect our intellectual property. We need to protect our patents, trade secrets, trademarks and copyrights. You must also respect the intellectual property rights of others. The unauthorized copying, manufacture, use, sale or importation of products protected by intellectual property laws could subject Harris and employees involved to civil and criminal liability.

Software

Harris frequently licenses computer programs owned by others. As a licensee, the company may be required to maintain the licensed programs as trade secrets. Employees having access to such programs are often obligated to maintain the licensed programs as trade secrets both during and after employment. Employees should not copy or use computer software and related documentation in violation of license or use restrictions. Harris Legal Counsel should be contacted concerning guidance for the protection and licensing of computer programs.

ALWAYS REMEMBER

At times, discussions will take place with others outside Harris that may involve either the disclosure or receipt of confidential information. It is important that an approved nondisclosure or confidentiality agreement be in place before you exchange any of Harris' trade secrets or receive someone else's confidential information. Consult Harris Legal Counsel in advance for assistance.

FOR MORE INFORMATION

If you have questions related to confidential information, you can contact your manager, Ethics Advisor or the Director of Business Conduct. Any questions about Intellectual Property should be referred to the Harris Legal Department. You can also review Policy [G-34, Proprietary Information](#) and Policy [G-12, Disclosure of Company Information to Outsiders](#).

Creativity in Our Jobs

As employees of Harris, we should continually strive to utilize our resources as creatively as possible. As a general rule, any innovations or discoveries you produce while working at Harris are the property of the company and should be disclosed to the company.

QUESTIONS AND ANSWERS

Q: What are some examples of "confidential information"?

A: Confidential information could be any information (and in any form such as paper, electronic, etc.) about company:

- Finances
- Business and marketing plans
- Proposals
- Projections and forecasts
- Customers and prospective customers
- Employees and compensation
- Drawings, manuals or inventions

- Computer programs and databases
- Technical or marketing data

Q: Can proprietary data provided by a supplier for a specific program within Harris be shared with other Harris organizations outside that program or shared with others outside the company?

A: The answer depends on whether the supplier has authorized the release of that proprietary information outside the specific program. Harris must comply with the restrictions that the supplier has placed on the use of its proprietary information. Contact Harris Legal Counsel for guidance.

INCLUSION

EMBRACING DIVERSE IDEAS AND TALENT.

Our employees are our most valuable resource and our goal is for every employee to be personally involved and share in Harris' success. We are committed to creating an environment that encourages employees to make full use of their creativity and unique talents by providing positive, open, inclusive, safe and motivating working conditions and the opportunity for personal growth and development.

Respect in the Workplace

Equal Opportunity

Harris is committed to maintaining a workplace atmosphere that will attract and retain employees who will contribute to the company's success. We are committed to fair employment practices and fostering a diverse work environment and recognize and value the creative potential that individuals from different backgrounds and abilities bring to their work. We comply with all applicable employment laws and provide equal employment opportunities.

Discrimination

We do not tolerate discrimination against groups or individuals based on race, color, national origin, religion, citizenship status, age, gender, gender identity, sexual orientation, marital status, veteran status, genetic information or other protected characteristics. We recruit, employ, promote and take other personnel actions based on each person's qualifications and ability to meet the requirements of the job.

We do not tolerate retaliation against any employee who files or participates in discrimination complaints filed with applicable investigative agencies.



Non-Harassment

We strive to provide a respectful work environment free from all forms of harassment and where all employees feel comfortable coming to work. Specifically, we do not tolerate behavior or harassment that creates an intimidating or offensive working environment and we will not tolerate retaliation against anyone who raises a concern about harassment in good faith.

If you experience or have concerns about discrimination or harassment, report your concerns to your manager immediately. You can also contact your Human Resources Business Partner, Ethics Advisor or Harris Legal Counsel or raise your concern anonymously via the Harris Adviceline or email to the Director of Business Conduct. All discrimination and harassment complaints will be promptly investigated and, where appropriate, disciplinary action will be taken to stop the inappropriate conduct and prevent its recurrence.

Human Trafficking

Harris has a zero tolerance policy regarding trafficking in persons. Major forms of human trafficking include forced labor, sex trafficking, bonded labor, debt bondage, involuntary domestic servitude, forced child labor and child soldiers. Not only are all of these acts inhumane, but as a government contractor, we could lose contracts if any Harris employees are found to have trafficked in persons, procured a commercial sex act or used forced labor in the performance of the government contract. Actions that will be taken against any employee for violations of this policy include, but are not limited to, removal from the contract, reduction in benefits or termination of employment.

FOR MORE INFORMATION

If you have questions related to respect in the workplace you can contact your manager, Ethics Advisor or the Director of Business Conduct. You can also review Policy [HR-01, Equal Opportunity and Affirmative Action](#) and/or Policy [HR-03, Harassment](#).

QUESTIONS AND ANSWERS

Q: One of our supplier representatives has made inappropriate remarks to me on several occasions and is making me feel uncomfortable. What can I do to stop this behavior?

A: You should report your concerns to your manager, Ethics Advisor, or the Director of Business Conduct. We prohibit all forms of harassment in your job, even when your interactions are with someone who works outside of Harris.

Q: I believe my boss is discriminating against one of my coworkers who recently came to our location from another country, but I'm afraid if I report my boss and she finds out I will be fired. What can I do?

A: At Harris, we have a zero tolerance policy for retaliation. Your coworker, along with all Harris employees, has the right to work free from discriminatory behavior from anyone, including your manager. You should report your concerns to your manager's manager, your Human Resources Business Partner, Ethics Advisor, or the Director of Business Conduct.

Privacy

We respect the privacy of our employees, our customers and others with whom we do business. We must ensure that proper measures are taken for the collection, use, storage, protection or destruction (when appropriate) of the personal information and data of our employees, customers and other business partners. You should only collect, use or share this type of information when we have a legitimate business need. In addition, when releasing this information to a third party you must ensure the person or group to whom you are releasing the information is authorized to receive it and has signed a confidentiality or nondisclosure agreement.

We are expected to follow all relevant policies and applicable laws to prevent unauthorized access, use or removal of personal information and data. Many countries have strict laws governing data protection and privacy.

ALWAYS REMEMBER

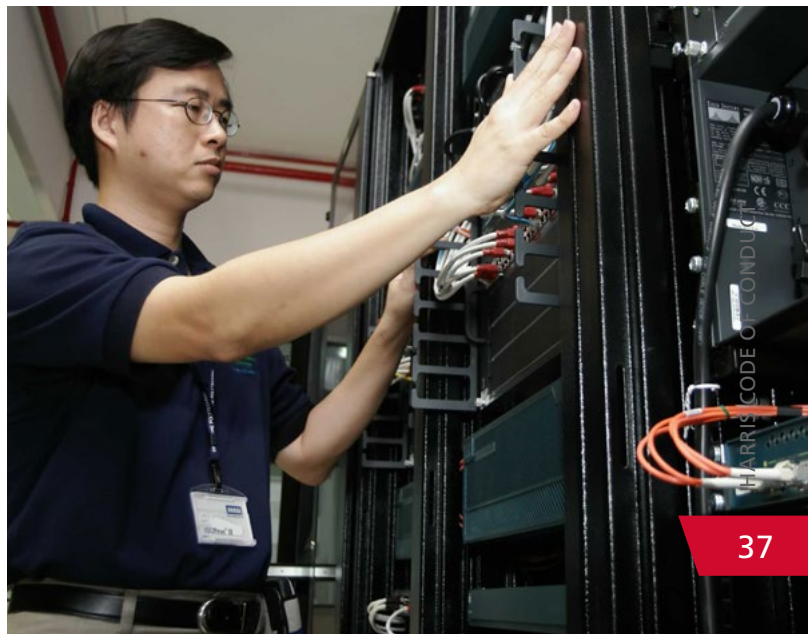
Only those employees with a “need to know” should have access to personal information about Harris employees, our customers and other business partners. If you have access to personal information, you must take reasonable precautions to protect it from loss or misuse and from unauthorized access, disclosure, alteration and destruction. You need to use special care when you are asked to transfer personal information to a third party.

FOR MORE INFORMATION

If you have questions related to data protection and privacy you can contact your manager, Ethics Advisor or the Director of Business Conduct. You can also review Policy [G-34, Proprietary Information, Records Retention Policy and Guidelines](#), Policy [HR-22, Worldwide Employee Privacy Policy](#) and the [Harris Communications Guidelines](#).

Q: What types of personal information or data could I encounter at work?

A: Personal information is any information that could be used to identify an individual. For example, names, addresses, social security numbers and salaries are all types of personally identifiable information.





RESOURCE APPENDIX

Resource Appendix

There are many resources available to you to make the right decisions and to report possible violations of the Code or ask questions when you are not sure about a certain situation or behavior, including:

▲ Legal or general issues

- Your manager
- A member of your management chain
- Your Ethics Advisor
- Harris Legal Counsel
- Director of Business Conduct

▲ Government contracts and other dealings with government officials

- Harris Legal Counsel

▲ Employment law or personnel issues

- Human Resources Business Partner

▲ Financial issues

- Vice President of Internal Audit
- Director of Business Conduct

▲ Conflicts of interest

- Your manager
- A member of your management chain
- Your Ethics Advisor

▲ Political Contributions, Lobbying and Gifts and Hospitality for Government Officials

- Government Relations Office
- Harris Legal Counsel

▲ AdviceLine

- Call the Adviceline at **1-855-477-4272**, which you can do anonymously. If you are outside the United States, go to AT&T World Wide Connect <http://www.business.att.com/bt/access.jsp>, to obtain your country access number and you will be prompted by the AT&T tone to dial the Harris Adviceline number.
- Use the Harris online Adviceline:
 - Business Operations (except Europe) use the Harris [Adviceline](#)
 - Business Operations in Europe use the Harris [E.U. Adviceline](#)
- The Adviceline is best used:
 - For serious issues like financial misconduct, bribery, antitrust violations and retaliation;
 - When you are uncomfortable using the individual contacts listed above or believe that your issue has not been addressed appropriately; or
 - When you wish to ask a question or file a report anonymously.

Policies

Policies are accessible from the Harris Intranet homepage. From connect.harris.com select “Policy and Procedures” from the menu. Scroll down and select Policies.

NOTE

Harris may from time-to-time revise its policies and/or procedures. In such an event, the corresponding provisions contained in this brochure shall be modified accordingly. Nothing in this brochure shall be interpreted to create a contract or guarantee of employment.

This Code of Conduct replaces the U.S. Edition and Non-U.S. Edition of the Standards of Business Conduct brochure.

Reference to the Standards of Business Conduct, U.S. or Non-U.S. editions in existing Harris policies, processes, agreements, contracts or other documentation, will be deemed a reference to this Code of Conduct. Similarly, Business Standards Advisors have been renamed Ethics Advisors under the new Code. Reference to Business Standards Advisors in existing Harris policies, processes, agreements or other documentation will be deemed a reference to Ethics Advisors.



Last updated 06/2014.