

Form C-730-1, International Anti-Corruption Questionnaire



Please complete and sign this form, and provide it to your Lockheed Martin contact.

Section 1 – Company Information		
Company Name	Company Web Site	
Address		
Name of Representative Signing this Questionnaire	Title	
Address		
Telephone	Fax	E-mail
Business Type: <input type="checkbox"/> Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Joint Venture <input type="checkbox"/> Sole Proprietorship <input type="checkbox"/> LLC <input type="checkbox"/> Other (explain):		
Place of Incorporation (or equivalent registration)	Commercial Registration Number	Date of Establishment
		Number of Employees

Section 2 - Questionnaire

Please attach additional pages as needed to provide a complete response to each question.

1. Project Information

- a. Please describe the nature of the project being considered (the “Project”) and the role and responsibilities of your company (the “Company”) for the Project:
- b. Please provide a short description of the Company and its qualifications for the proposed Project:
- c. Has the Company conducted business previously with Lockheed Martin or any of its subsidiaries?
 No Yes. If yes, please describe, including time frame and contact information.
- d. Will the Company receive any fee, reimbursement, or other compensation from Lockheed Martin in connection with the Project?
 No Yes. If Yes, please explain in detail:

2. Company Ownership & Management

- a. Are the securities of the Company traded publicly?
 No Yes. If Yes, identify the exchange(s) where traded:
- b. Identify the owner(s)/shareholder(s) of the Company and the nationality and percentage interest held by each. Provide the address, business, and employment background of each owner on a separate page attached to this Questionnaire. Also attach an organization chart showing the Company’s relationship to any parent and/or subsidiary.

Notes: (i) If ownership is held in whole or in part by an entity, identify the owners, the percentage held by each, and the form of organization and governing jurisdiction of that owning entity (and similarly for any higher-tier owning entities) so that ultimate ownership is specified. (ii) If you answered yes to question 2.a. above, the list of owners/shareholders need only refer to persons directly or indirectly holding an ownership interest greater than 5% of any class of the Company’s securities.

Owner(s)/Shareholder(s)	Nationality	% Ownership

c. Please identify the principal officers of the Company, the nationality and employment background of each:

Names/Titles of Principal Officers	Nationality	Employment Background

3. Governmental Connections of the Company (With respect to a country with a royal family, members of the royal family are to be considered government or public officials in responding to this section.)

- a. Is the Company owned or controlled by any government or government-owned or controlled company (“instrumentality”)?
 No Yes. If Yes, describe the governmental ownership and/or controlling interest:
- b. Does the government or Royal Family subsidize the Company?
 No Yes. If Yes, describe:
- c. Is any owner, director, officer, employee, or other representative of the Company a current or former official or employee of the government of the country or any agency, military branch, or instrumentality thereof (including a government-owned or government-controlled company)?
 No Yes. If Yes, identify each person, his/her last date of employment, and government department, agency or instrumentality:
- d. Is any owner, director, officer, employee, or other representative of the Company an official of any political party or candidate for political office?
 No Yes. If Yes, explain in detail:
- e. Does or will the Company or any owner, director, officer, employee, or other representative of the Company have any family (by blood or marriage) or business relationship with any official or employee of the government of the country or any agency, military branch, or instrumentality thereof (including a government-owned company)?
 No Yes. If Yes, explain each relationship:
- f. Does or will any government or public official or employee or any official of any political party or candidate for political office have any interest in, or receive any benefit from, the proposed Project?
 No Yes. If Yes, explain in detail:
- g. During the past five years, has the Company provided monetary or other contributions to any government or public official, political party, political campaign, or government department, agency, or instrumentality?
 No Yes. If Yes, explain in detail, including the recipient, date, amount, and nature of the contribution:
- h. During the past five years, has the Company provided hospitality to any government or public official, including meals, entertainment, transportation, hotels, gifts, etc.?
 No Yes. If Yes, explain in detail:
- h. During the past five years, has the Company provided any facilitating or expediting payments to any government or public official, department, agency, or instrumentality?
 No Yes. If Yes, explain in detail, including the name of the recipient, date, amount, and nature of the payment:
- i. Is the Company aware of any other relationships, connections, or ties to any government or public official or employee or any official of any political party or candidate for political office such that execution of the Project could be expected to affect the award of business to Lockheed Martin or affect the evaluation, payment approval, or other aspect of the administration of any Lockheed Martin business with the government of the country?
 No Yes. If Yes, explain in detail:

4. Allegations and Legal Proceedings

- a. During the past five years, has the Company, any affiliate (any entity controlling, controlled by, or under common control with the Company), any predecessor entity or affiliate of the Company, or any present or former owner, director, officer, or key employee been the subject of any allegations of fraud, misrepresentation, bribery, or other similar activity in the media or other forum?
 No Yes. If Yes, please explain in detail:
- b. Has the Company, any affiliate (as defined above), any predecessor entity or affiliate of the Company, any present or former owner, director, officer, or key employee ever been debarred, suspended, or otherwise restricted from doing business with any government or been notified that such action is pending?
 No Yes. If Yes, please explain in detail:
- c. Has the Company, any affiliate (as defined above), any predecessor entity or affiliate of the Company, or any present or former owner, director, officer, or management representative ever been charged with a criminal act or been the subject of a civil or criminal investigation or any other proceeding involving an allegation of fraud, misrepresentation, bribery, or other similar activity?
 No Yes. If Yes, explain in detail:

- d. During the past ten years, has the Company, any affiliate (as defined above), any predecessor entity or affiliate of the Company, or any present or former owner, director, officer, or management representative had a criminal conviction?
 No Yes. If Yes, explain in detail:
- e. Does the Company have any pending material legal proceeding or have any pending proceeding in bankruptcy or insolvency?
 No Yes. If Yes, explain in detail including identification of the jurisdiction and case number of any proceeding:

5. Representative, Consultant, or Agent Practices

- a. Does the Company have currently or has it had within the past three years a sales representative, consultant, or agent of any kind entitled to a commission or other fee or payment with respect to the Company's business or activities in the country?
 No Yes. If Yes, provide complete details of all such person(s) and the associated business arrangement(s):
- b. Does the Company intend to use a sales representative, consultant, or agent of any kind in connection with the proposed Project?
 No Yes. If Yes, provide complete details of all such third parties and the associated business arrangements, including any intermediation between the sales representative, consultant, or agent and any governmental or public official or entity on behalf of this proposed Project:
- c. Does the Company require anti-corruption training of its consultants and, if so, how often?
 No Yes.

6. Company Policies and Procedures

- a. Does the Company require anti-corruption training of its employees and, if so, how often? No Yes.
- b. Does the Company have a Code of Ethics, Code of Business Conduct, or similar policy? No Yes. If Yes, please provide a copy.
- c. Does the Company have any policy or procedure regarding investigation or the performance of anti-corruption due diligence prior to the engagement of sales representatives, consultants, or other agents?
 No Yes. If Yes, please provide a copy.
- d. Does the Company have any policy or procedure regarding the giving of gifts, business courtesies, gratuities, or hospitality to commercial relations and government or public officials, by Company personnel or its consultants, representatives, or agents?
 No Yes. If Yes, please provide a copy.
- e. Does the Company have any policy or procedure regarding compliance with laws prohibiting bribery or corruption of commercial enterprises and public officials?
 No Yes. If Yes, please provide a copy.
- f. Does the Company have any policy or procedure regarding facilitating or expediting payments to government or public officials, departments, agencies, or instrumentalities?
 No Yes. If Yes, please provide a copy.
- g. Does the Company have any policy or procedure regarding the management and protection of proprietary information of others?
 No Yes. If Yes, explain in detail or provide a copy:
- h. Does the Company have any policy or procedure regarding the management and protection of information and goods with respect to which military or security classifications apply and/or with respect to which national or international export controls apply?
 No Yes. If Yes, explain in detail or provide a copy:
- i. Does the Company conduct any audits, assessments, or other reviews of its compliance with these policies and procedures?
 No Yes. If Yes, explain in detail:
- j. Does the Company have an implemented a GAAP compliant accounting system or an equivalently-rated system (e.g., IFRS)?
 No Yes. If No, describe the Company's accounting system:
- k. Does the Company undergo periodic audits by a third party or outside accounting/audit firm?
 No Yes. If Yes, describe the frequency and the auditing party:
- l. Does the Company require its employees and agents to provide itemized invoices and receipts in order to be reimbursed for all expenses, including hospitality and entertainment?
 No Yes. If No, provide a brief explanation:
- m. Are cash payments permitted by the Company?
 No Yes. If Yes, describe under what conditions and controls:

Section 3 – Certification

Please number consecutively and initial any additional pages. Additional pages should reference the information provided to the corresponding number and letter on this Questionnaire.

How many additional pages are attached containing responses to any of the items above? _____

The Company representative signing below represents that he or she is authorized to sign this Questionnaire on behalf of the Company and that Lockheed Martin may rely upon a scanned or faxed signature as binding upon the Company.

The Company understands that Lockheed Martin will rely on the above information and other business information provided by the Company in determining whether to enter into an agreement with the Company regarding the Project (as it may change from time to time), and that, in addition to any other remedies that may be available, any false or misleading information provided by the Company shall be grounds for the immediate termination of any such agreement.

The Company agrees to immediately notify Lockheed Martin of any change of status regarding any information provided in Section 2, items 2 – 6 above.

Company Name

Signature

Name

Title

Date