

WHISTLEBLOWER POLICY

Prepared By: Gladys Walker - VP, Human Resources

Issued By: Configuration Management

Authorized By: Matt Keegan – President & CEO

COMPANY DOCUMENTATION CONTROL

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AMENDMENT SUMMARY

| Rev | Date | Change Description |
|-----|-----------|---|
| 1 | 13 DEC 23 | Initial issue |
| 2 | 18 DEC 23 | Remove reference to QP089 |
| 3 | 23 JAN 24 | Title correction for VP, Security and Trade Compliance |
| 4 | 08 FEB 24 | Change to policy only, process will be in a separate document |
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1 Introduction

Leonardo Electronics Us Inc (LEI), in the pursuit of its business goals and objectives, is involved in the fight against unlawful conduct and, in particular, corruption at any work level and in all geographical areas, both through the dissemination and promotion of ethical values and principles and through the actual implementation of rules of conduct and control processes, in line with the requirements set forth by the applicable rules and regulations and with the best international practices.

2 Scope

This document applies to all employees and includes temporary, contract workers and consultants of LEI and its subsidiaries.

3 Related Documents & Forms ISO 9001 International Standard

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|-------------------------|---|
| CP-100 | Ethics and Business Conduct Policy |
| CP-202 | Ethics and Business Conduct Policy Acknowledgement |
| CP-203 | Ethics and Business Conduct Policy Recertification Statement |
| HR-100 | LEI Employee Handbook |
| HR-101 | Manager's Guide to Human Resource |
| DoD 5500.7-R | Joint Ethics Regulation |
| (Italy) Decree 231/2001 | Italian Legislative Decree 231 of 2001 |
| (UK) 2010 c. 23 | Bribery Law 2010 |
| 15 U.S.C. § dd et. seq. | Foreign Corruption Protection Act (FCPA) |
| 5 C.F.R. 2635 | Standards of Conduct for Executive Branch |
| 48 C.F.R. 52.203-13 | Contractor Code of Business Ethics and Conduct |
| 48 C.F.R. 52.203-14 | Display of Helpline Poster(s). |
| 48 C.F.R. 52.203-15 | Whistleblower Protections Under the American Recovery and Reinvestment Act of 2009 |

4 Policy

A whistleblower as defined by this policy is an employee of Leonardo Electronics US who reports an activity that the employee considers to be illegal or dishonest to one or more of the parties specified in this policy. The whistleblower is not responsible for investigating the activity for determining fault or corrective measures; appropriate management officials are charged with these responsibilities. Any non-compliance with LEI's Code of Conduct, governing documents and/or relevant laws and regulations, will be followed up and consequences shall be consistent, predictable, and proportionate. Breaches of the law, our Code or our governance system may lead to disciplinary measures up to and including dismissal and may be reported to the relevant authorities where appropriate.

Any direct participation in corrupt activities, even if no benefit is received by the employee, will normally lead to termination of employment, and reported to authorities. This concept also applies to contractual parties, even if the corruption may not relate to business or other interaction with or for LEI.

LEI considers it important that employees provide feedback on matters perceived as positive as well as on matters perceived as negative, to protect the company, our colleagues, and our stakeholders. If any employee or third party believes that someone is violating these Codes and/or the law, we ask that they report this immediately. If you have experienced or witnessed misconduct or unethical behavior, you must speak up and report it.

LEI commits to review and where appropriate investigate concerns raised by employees and third parties regarding unethical behavior and potential misconduct. We have transparent, fair, and confidential procedures for employees and third parties to raise concerns. LEI will not retaliate against whistleblowers or employees that raise concerns.