

Harris Standards of Business Conduct



INTERMEDIARY AND SUPPLIER EDITION

OCTOBER 2011

HARRIS
assuredcommunications®



Dear Valued Intermediary or Supplier:

Harris has a strong business conduct program that helps to keep our business well within legal requirements and also provides a working environment in which all Harris stakeholders can feel comfortable about our business standards.

Every day, around the world, Harris strives to lead our markets by delivering value to our customers and by responsibly managing our business. We believe the responsibility extends beyond our operations to those of our intermediaries and supply partners who are fundamental to our ability to fulfill our mission statement, which is: "Harris Corporation will be the best-in-class global provider of mission-critical *assured communications*[®] systems and services to both government and commercial customers, combining advanced technology and application knowledge to offer a superior value proposition." We also believe that Harris should address the impact of our business on our community, on society, and on our environment.

Our program has been developed around a group of core values, standards and policies that are explained in this booklet. These policies and standards support our shared company values, the integrity of technologically superior products, and an outstanding reputation with customers worldwide. During the course of daily business, there will sometimes be "gray" areas that require interpretation, advice, and counsel. In those instances, I encourage you to seek guidance from the Harris Director of Business Conduct, your Harris Sales contact, or a member of the Harris Legal Department.

As an important representative of Harris in the global markets we serve, your compliance with our *Standards of Business Conduct* and diligence in seeking guidance when needed, will ensure that Harris remains a company in which we can all take pride.

Sincerely,

A handwritten signature in black ink that reads "William M. Brown". The signature is written in a cursive, flowing style.

William M. (Bill) Brown
President and Chief Executive Officer

Table of Contents

Introduction.....	1
General.....	2
Global Anti-Bribery Policy	2
Kickbacks, Favors, Gifts, and Entertainment	3
Export Control Regulations	3
International Boycotts.....	3
Inside Information.....	4
Conflicts of Interest	4
Unfair Business Practices	4
Political Contributions, Charitable Donations, and Lobbying on Harris' Behalf	4
Safeguard of Confidential Information	4
Protecting Human Rights	5
Environmental Standards.....	5
Standards of Compliance.....	5
Training	5
Harris Contact Information	6
To Report a Concern.....	7
Harris Corporation Standards of Business Conduct Acknowledgement Form	9

Introduction

Harris Corporation and its affiliated entities worldwide (“Harris”) are committed to the highest standards of product quality and business integrity in our dealings with customers, Suppliers, and Intermediaries (as defined below). As such, Harris’ values-based ethics program is based upon the following Company Values.

- **Integrity**—Harris has a desire for its business to succeed and grow, but we do not compromise our values to achieve that success.
- **Delivering Customer Value**—Harris values customer focus in all that we do.
- **Global Inclusion/Collaboration/Teamwork**—Harris realizes that more creative solutions and success come from working together and supporting each other to achieve our goals.
- **Results-Oriented Environment**—Harris values constant striving for improvement in all that we do and in flawlessly executing our tasks to achieve results.
- **Innovation**—Harris is focused on solving mission-critical needs through innovation and creative thinking.
- **Personal Growth and Fulfillment**—Harris values self-directed, continual learning and personal fulfillment.

Harris’ value-based ethics program focuses on the core value of **Integrity**. Harris makes it clear that there are no “gray” areas when it comes to **Integrity** in all we do and who we are. Harris further defines **Integrity** to mean:

- **Respect**—Harris pledges to treat all stakeholders—employees, customers, shareholders, Suppliers, Intermediaries, and our communities—with dignity and respect.
- **Collaboration**—Harris’ employees are inspired—and inspire each other—to maximize their contributions to Harris’ organizational efforts.
- **Citizenship**—Harris will obey the laws of the countries in which we operate and will strive to better the communities in which we live and work.
- **Honesty**—Harris makes truthfulness and accuracy the basis for all of our interactions.
- **Responsibility**—Each of us at Harris must be personally accountable for all of our actions taken on behalf of the company.

Harris’ value-based ethics program requires all Suppliers, Intermediaries, and the Harris employees who work with them to conduct themselves with the highest standards of honesty, fairness, and integrity. It is critical to Harris that Suppliers, Intermediaries, and employees maintain the highest ethical standards, adhere to all applicable laws, and avoid even the perception of impropriety or conflict of interest.

These Standards of Business Conduct apply globally to all Harris Intermediaries and Suppliers. “Intermediary(ies)” means any third party distributors, dealers, sales representatives, agents, partners, co-venturers, consultants, resellers, systems integrators, companies, corporations, person(s), or other entities that directly or indirectly sell, or seek to sell, any kind of goods or services on behalf of Harris; this includes the Intermediary’s, employees, agents and other representatives. “Supplier(s)” means any third party suppliers, contractors, companies, corporations, person(s) or other entities that directly or indirectly sell, or seek to sell, any kind of goods or services to Harris; this includes the Supplier’s employees, agents, other representatives, suppliers, contractors, and subcontractors.

Questions concerning this policy should be directed to the Harris Director of Business Conduct or to the Harris Legal Department (see page 6 for contact information).

General

Harris conducts business in many countries that have different laws and requirements. As a United States company, Harris must comply with certain United States laws (including, but not limited to: the Foreign Corrupt Practices Act of 1977 (“FCPA”); Economic Sanctions and Boycotts laws; and Export Administration Regulations) that often apply to our business activities outside the United States. An Intermediary or Supplier that violates these laws may be subject to fines and even imprisonment in the United States, whether or not the improper conduct occurred in the United States and regardless of the nationality of the employee(s) involved.

Outside of the United States, the majority of the countries in which Harris does business have their own laws governing business practices, such as the United Kingdom Bribery Act of 2010 (“UK Bribery Act”). These laws often prohibit certain types of business practices both within and outside those countries’ national boundaries, and impose additional penalties for violations. Accordingly, Harris Intermediaries/Suppliers may also be subject to the laws of these countries.

The practical and legal significance of these laws and the extent of their reach may not always be clear. Additionally, conflicts may arise between a local law and Harris’ standards or policies. In such situations, even if an activity is legal, if it violates the Harris Standards of Business Conduct, such activity will not be tolerated. Intermediaries and Suppliers with questions involving Harris’ business standards should consult with the Harris Legal Department or the Director of Business Conduct.

Global Anti-Bribery Policy

Harris is committed not only to conducting its business in strict compliance with the anti-corruption laws of the United States and every other country in which we do business, but also to do so with integrity and transparency, free from any improper influence whatsoever. Harris policy requires Intermediaries and Suppliers to comply with all applicable anti-bribery laws and beyond that never to make or receive a payment or offer a gift that may be construed as illegal or otherwise improper, regardless of local law or customary practice.

Almost every country in which we do business is a party to the Organization of Economic Cooperation and Development’s (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions. This international agreement commits its signatories to implement national laws that criminalize bribery of a public official. In the United States, this treaty has been implemented through the FCPA. The offer or payment, or even the promise to pay, anything of value to a foreign official for the purpose of doing business or gaining an unfair advantage is a violation of the FCPA. In the United Kingdom, this treaty has been implemented through the UK Bribery Act, which criminalizes offering, paying, requesting or receiving bribes and prohibits bribery in both the public *and* private sectors.

Some countries (including the United States) also make it an offense to fail to properly and accurately record in the company’s books and records payments to or for the benefit of public officials. The FCPA and Harris policies require that our Intermediaries and Suppliers maintain a system of internal accounting controls.

Domestic and international anticorruption laws are vigorously policed and enforced. Failure to comply can result in significant civil and criminal sanctions, for both Harris and the Intermediary/Supplier responsible for the relevant improper conduct. Corporate penalties can include fines, a ban on future business with the government of that country, and denial of export licenses. Sanctions for individuals (such as employees of both Harris and the Intermediary/Supplier) that violate anticorruption laws include fines and/or imprisonment.

The fact that bribery may be condoned as an accepted local practice in a country does not relieve Harris or Harris’ Intermediaries/Suppliers from complying with the FCPA, the UK Bribery Act, or any other applicable anticorruption laws.

As a Harris Intermediary or Supplier, Harris expects that all of your business dealings will be done in strict compliance with applicable laws, these Standards of Business Conduct, and with integrity and transparency, free from any improper influence whatsoever.

Kickbacks, Favors, Gifts, and Entertainment

Harris does not offer, promise, or provide any kickbacks, favors, cash, gifts, gratuities, entertainment, or anything of value (collectively, “favors”) to obtain favorable treatment or an improper advantage from anyone. Harris Intermediaries and Suppliers are similarly prohibited from offering such favors to any Harris employee or on Harris’ behalf to any third party. This prohibition extends to the offering, promising, or giving of any favors to any family members of both the Intermediary/Supplier’s or Harris’ employees or with any other persons with whom the Harris Intermediary/Supplier or Harris employees have personal or business relationships, in exchange for obtaining or retaining business.

Export Control Regulations

Harris conducts international business in strict compliance with export laws and regulations of the United States and the countries in which it does business. United States law, for example, prohibits the export of certain commercial products, strategic goods, defense articles, and their related technologies, unless licensed by the appropriate federal agency. Those same laws and regulations may apply to the re-export of goods and services from another country.

The sharing of technical data with third parties is also considered an export, regardless of the means used to share or communicate this data. Exports of technical data can take place in a variety of ways, including but not limited to, document shipments, email, proposals to customers, technical publications and presentations, demonstrations, promotional literature, and plant tours.

In accordance with applicable export control laws, all Harris Intermediaries are required to provide end-user information for every order placed with Harris. Similarly, all Harris Suppliers must provide export control classification information when required. In addition, all Harris Intermediaries and Suppliers should provide receiving party information to Harris prior to providing technical data to a potential receiving party. Such information must include the receiving party’s full name and address. All Intermediaries must also be prepared to answer additional questions about the end-user and their proposed use of Harris products. All Suppliers must also be prepared to answer additional questions about their products and the related export control classifications.

If export licenses are required from any Governmental agency for the export of products to end-users, the Intermediary/Supplier shall provide Harris with all assistance necessary for Harris to obtain such export licenses.

Contact the Harris Legal Department, the Director of Trade Compliance, or the Director of Business Conduct if you have any questions about Harris policies regarding the export or trade control laws of the United States or any other country.

International Boycotts

Under United States law, it may be illegal to enter into agreements or to provide information that could be construed as furthering certain boycotts of third countries or restricting international trade practices. The U.S. Government may impose criminal or civil penalties on U.S. companies, their international subsidiaries, operations, and employees for violation of its boycott laws.

Since the mere receipt of a request to engage in illegal boycott activity may be a reportable event under U.S. law, all Intermediaries and Suppliers must immediately consult the Harris Legal Department or the Director of Business Conduct for advice if such a request is received. Under no circumstances should the request be acted upon without first consulting Harris.

Inside Information

As a publicly traded United States corporation, Harris is subject to the laws and regulations of the United States Securities Exchange Commission. Under United States law, it is illegal to utilize material, non-public information relating to Harris or its business, or relating to material, non-public information of other companies by virtue of Harris' interaction with such other companies (including but not limited to Harris customers, suppliers, vendors, or other business partners).

In the event that a Harris Intermediary or Supplier has any material, non-public information relating to Harris or its business, or relating to other companies through Harris, then such Intermediary/Supplier is prohibited from buying or selling Harris or such other companies' securities or engaging in any other action to take advantage of such knowledge, including passing that information on to others.

Conflicts of Interest

As representatives of Harris, all Intermediaries or Suppliers are expected to use reasonable efforts to avoid conflicts of interest. If an Intermediary or Supplier has, or appears to have, a conflict of interest, the Intermediary/Supplier must promptly disclose such conflict to the Harris Director of Business Conduct or the Harris Legal Department.

Unfair Business Practices

Harris is committed to conducting its business in strict compliance with the anti-competition and antitrust laws of every country in which we do business. Harris policy requires Intermediaries and Suppliers to comply with all applicable anti-competition laws. Therefore, Harris Intermediaries and Suppliers are prohibited from fixing prices, colluding or rigging bids with competitors, allocating customers or markets with competitors, or exchanging current, recent, or future pricing information with competitors.

Political Contributions, Charitable Donations, and Lobbying on Harris' Behalf

Harris Intermediaries and Suppliers are not authorized to make any type of political contributions or charitable donations on Harris' behalf, nor are Harris Intermediaries and Suppliers authorized to undertake any type of lobbying or other similar representative efforts on Harris' behalf before any kind of government entity, official, body, or representative without the express written consent of Harris.

Safeguard of Confidential Information

Harris respects and safeguards our own confidential, proprietary, and trade secret information. We do so by, among other things, keeping it secure, limiting access to it, and by avoiding discussion of such information in public places. Harris will similarly respect and safeguard the confidential, proprietary, and trade secret information of our Intermediaries and Suppliers. Likewise, we expect Intermediaries and Suppliers to safeguard Harris' confidential, proprietary, and trade secret information, even after the business relationship ends. All Intermediaries and Suppliers with access to Harris' confidential, proprietary, and trade secret information should have a Nondisclosure Agreement, or other contractual document that includes confidentiality provisions, in place with Harris.

Contact the Harris Legal Department, the Director of Business Conduct, or your Harris contact if you do not have a Nondisclosure Agreement (or other contractual document) in place with Harris or have any questions about Harris policies regarding confidential information.

Protecting Human Rights

Harris practices strict adherence to all applicable local and U.S. employment-related laws. Harris creates a safe and healthy work environment, free of harassment and abuse. Harris does not discriminate based on race, color, religion, age, national origin, ancestry, ethnicity, gender, gender identity, sexual orientation, marital status, veteran status, disability, genetic information, citizenship status, or membership in any other group protected by federal, state, or local law. Harris complies with applicable wage (including minimum wages) and working hour laws and regulations. Harris does not employ individuals under the legal employment age in any country in which we operate, nor do we use forced or involuntary labor.

Harris expects its Intermediaries and Suppliers: (i) to follow all applicable employment-related laws, (ii) to provide a safe and healthy work environment, free of harassment and abuse, (iii) not to discriminate against their employees and potential employees and provide equal opportunity to all, (iv) to comply with all applicable wage and working hour laws and regulations, and (v) not to use underage, forced, or involuntary labor.

Environmental Standards

Harris complies with all applicable environmental laws and regulations. We also monitor our practices to ensure we remain legally compliant. Harris will seek to do business with Intermediaries and Suppliers who are similarly committed to sound environmental practices.

Standards of Compliance

Harris Intermediaries and Suppliers will make every effort to communicate these standards to all employees and downstream supply chain partners who support Harris. We expect our Intermediaries and Suppliers to notify Harris immediately should they become aware of any noncompliance with these standards, and to take the necessary steps to correct such noncompliance in a timely manner.

Training

Training is a key element of Harris' Business Conduct Program. As such, Harris can and will assist with additional training courses relating to the topics discussed in these Standards of Business Conduct. To obtain such training from Harris, please contact the Harris Legal Department or the Director of Business Conduct.

Harris Contact Information

Director of Business Conduct

Denise King
Director of Business Conduct

Tel: +1-321-724-3023
Fax: +1-321-674-2864

dkingcol@harris.com

Mailing Information

Director of Business Conduct
Harris Corporation
M/S D-11B
1025 West NASA Boulevard
Melbourne, FL 32919 USA

Export/Import Controls

Mary Menz
VP, Trade Compliance

Tel: +1-585-241-8348
Fax: +1-585-242-4755

mmenz@harris.com

Harris Legal/Finance

Government Communications Systems Division

Bill Conner
VP & Sr. Counsel

Tel: +1-321-727-4001
Fax: +1-321-726-3481

bill.conner@harris.com

Ron Etzel
Director, Contracts

Tel: +1-321-729-3705
Fax: +1-321-726-3189

retzel@harris.com

Debbie Menendez
Director, Contracts

Tel: +1-321-729-7866
Fax: +1-321-729-3066

dmenende@harris.com

RF Communications Division

Paul Greco
Contracts VP

Tel: +1-585-241-8449
Fax: +1-585-241-8309

pgreco@harris.com

Michael Maurer
Controller VP

Tel: +1-585-241-8344
Fax: +1-716-244-2917

mmaurer@harris.com

Integrated Network Solutions

Broadcast Communications

Laurie McCall
VP & Associate General Counsel

Tel: +1-303-476-4634
Fax: +1-303-476-5025

lmccall@harris.com

Sonja Frakes
Director, Contracts Management

Tel: +1-303-476-4590
Fax: +1-303-476-5025

sfrakes@harris.com

Harris CapRock Communications

Alan Aronowitz
VP & General Counsel

Tel: +1-832-668-2750
Fax: +1-832-668-2380

aaronowi@harris.com

Ron Coker
Deputy General Counsel

Tel: +1-832-668-2755
Fax: +1-832-668-2780

rcoker01@harris.com

Cyber Integrated Solutions and Healthcare Solutions

Michele Pinto
Counsel

Tel: +321-724-3341
Fax: +321-727-9652

mpinto01@harris.com

Harris Information Technology Services (HITS)

Michele St. Mary
VP & Counsel

Tel: +1-703-483-8610
Fax: +1-703-610-4303

mstmary@harris.com

To Report a Concern—Harris Adviceline Information

Harris, in collaboration with our Intermediaries and Suppliers, endeavors to achieve a leadership position in our markets through the adoption of responsible management practices related to business conduct, human rights, and the environment.

Harris strongly encourages any Intermediary or Supplier who feels pressured by a Harris employee, customer, or supplier to violate the law or these Harris Standards for Intermediaries and Suppliers to contact Harris' Director of Business Conduct at 1-321-724-3023 immediately.

To call toll-free or to make an anonymous inquiry or complaint please use the Harris Adviceline:

By Phone: 1-855-HRS-4BSA* (1-855-477-4272)*

* For questions or concerns outside the United States, connect first to AT&T World Wide Connect, <http://www.business.att.com/bt/access.jsp>, to obtain your country access number before being prompted by the AT&T tone to dial the Harris Adviceline.

Online: www.HarrisAdviceline.com, or for questions and concerns in Europe use www.HarrisAdvicelineEU.com.

Harris Corporation Standards of Business Conduct Acknowledgement Form

Intermediary/Supplier Edition

October 2011

Please complete the form, sign it, detach it along the perforations, and give it immediately to the Harris Legal Department or your Harris Sales Representative.

Consistent with the above policy, as a Harris Intermediary or Supplier, I/we acknowledge and agree to the following:

We Acknowledge and Abide by This Policy

As a Harris Intermediary or Supplier, I/we acknowledge that I/we have read this policy and agree to apply it in all dealings with, and on behalf of, Harris. I/we understand that our failure to sign and return the Harris Standards of Business Conduct Acknowledgement Form may result in our disqualification from consideration for business, and/or future business, with Harris and its affiliates.

We will be fully responsible for ensuring that any subcontractors, agents, or other third parties that we employ in our work for Harris, as permitted by our agreement with Harris, will act consistently with these Standards of Business Conduct.

Acknowledged and Agreed by:

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Company Name: _____

Company Address: _____



Harris Corporation
1025 West na Sa Boulevard, Melbourne, FL 32919
www.harris.com | 1-800-4-Harris