Lockheed Martin Corporation

EIN: 52-1893632

Date of Action: September 7, 2017

Attachment to Internal Revenue Service Form 8937 (October 13, 2017)

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the "Code"). This attachment includes a general summary regarding certain U.S. federal income tax laws and regulations relating to the effects of the Exchange (as defined below) on the tax basis of securities of Lockheed Martin Corporation ("LMC") received in the Exchange.

THIS SUMMARY IS FOR GENERAL INFORMATION PURPOSES ONLY, AND IS NOT INTENDED TO BE, AND SHOULD NOT BE CONSTRUED TO BE, LEGAL OR TAX ADVICE TO ANY PARTICULAR HOLDER. HOLDERS ARE URGED TO CONSULT THEIR OWN TAX ADVISORS AS TO THE CONSEQUENCES TO THEM OF PARTICIPATING IN THE EXCHANGE OFFER IN THEIR PARTICULAR CIRCUMSTANCES, INCLUDING THE APPLICABILITY AND EFFECT OF U.S. FEDERAL, STATE, LOCAL, AND NON-U.S. INCOME, ESTATE, GIFT AND OTHER TAX LAWS.

Holders are urged to read the Offering Memorandum relating to the notes, particularly the discussion beginning on page 46 under the heading "Certain U.S. Federal Income Tax Consequences."

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Line 10 – CUSIP Number

539830AK5	8.50% Debentures due 12/01/2029
539830AD1	7.20% Debentures due 05/01/2036
539830AR0	6.15% Notes due 09/01/2036
539830AU3	5.50% Notes due 11/15/2039
539830AW9	5.72% Notes due 06/01/2040
539830AZ2	4.85% Notes due 09/15/2041
539830BL2	4.70% Notes due 05/15/2046

Line 14 – Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action.

On August 7, 2017, LMC commenced an offer to exchange (the "Exchange") any and all of its outstanding 8.50% Debentures due 2029, 7.20% Debentures due 2036, 6.15% Notes due 2036, 5.50%

Notes due 2039, 5.72% Notes due 2040, 4.85% Notes due 2041 and 4.70% Notes due 2046 for a new series of 4.09% notes due 2052 (the "new notes") and an additional cash amount, if applicable. In addition, eligible holders whose notes were accepted in the exchange offer received a cash payment representing accrued and unpaid interest on such notes to, but not including, the settlement date of September 7, 2017.

Line 15 – Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis.

The Exchange will constitute a recapitalization under Section 368(a)(1)(E) of the Code if both the old notes and the new notes are treated as "securities" for U.S. federal income tax purposes. Because each of the old notes and new notes has a term of more than ten years, we intend to treat the old notes and the new notes as securities for this purpose. Under such treatment, the Exchange would qualify as a recapitalization for U.S. federal income tax purposes. Our determination that the old notes and the new notes are securities for these purposes, however, is not binding on the Service or the courts. Holders are encouraged to consult their own tax advisors regarding the U.S. federal income tax consequences of the Exchange if the old notes or the new notes were not considered securities for U.S. federal income tax purposes.

Exchange: Assuming that the Exchange qualifies as a recapitalization, the holder's initial adjusted tax basis in the new notes received (other than any new notes representing the fair market value of any excess principal amount of the new notes received over the principal amount of the old notes surrendered, as discussed below) will be equal to the holder's adjusted tax basis in the old notes exchanged therefor (i) reduced by any cash, other than with respect to accrued but unpaid interest, and the fair market value of any excess principal amount of the new notes received over the principal amount of the old notes surrendered, and (ii) increased by the amount of any gain recognized by the holder in the Exchange. A holder's initial tax basis in the portion of the new notes representing excess principal amount of the new notes received over the principal amount of the old notes surrendered will be the fair market value thereof at the time of the Exchange.

Cash in Lieu of Fractional New Notes: Assuming the Exchange is properly treated as a recapitalization for U.S. federal income tax purposes, if a U.S. Holder receives cash in lieu of fractional portions of new notes, the holder should be treated as if it received in the Exchange the fractional new notes for which cash is paid (having a tax basis determined under the rules described herein) and immediately sold such fractional new notes for cash.

Line 16 – Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates.

Solely for U.S. federal income tax purposes, LMC has determined that (i) the new notes are "traded on an established market" within the meaning of section 1.1273-2(f) of the Treasury Regulations, and (ii) the "issue price" of the new notes within the meaning of section 1.1273-2(b) of the Treasury Regulations is $1,017.39 per $1,000 face amount of the new notes.

Line 17 – List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

Sections 354, 356, 358, 368, 1001, 1012, and 1273.

Line 18 – Can any resulting loss be recognized?

Based on a determination that the Exchange qualifies as a recapitalization, a holder who exchanges old notes for new notes and cash would not recognize loss on the Exchange. Assuming the Exchange is properly treated as a recapitalization for U.S. federal income tax purposes, if a holder receives cash in lieu of fractional portions of new notes, the holder should be treated as if it received in the Exchange the fractional new notes for which cash is paid (having a tax basis determined under the rules described herein) and immediately sold such fractional new notes for cash. A sale of a new note will result in capital gain or loss to a holder equal to the difference between the amount realized on the disposition (not including the amount attributable to accrued but unpaid interest on the new note) and the holder's adjusted tax basis in the new note immediately before the disposition. The adjusted tax basis of the new notes generally will equal the holder's initial tax basis in the new notes calculated as described above, reduced by any premium amortized by such holder with respect to the new notes.

Line 19 – Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The Exchange was consummated on September 7, 2017. For a holder whose taxable year is the calendar year, the reportable tax year is 2017.