Privacy Notice for Australia

You have indicated that you either live in, or want to submit a question or allegation through this OpenLine portal about a matter that occurred in Australia, which has data protection regulations that require you to be advised how the personal information you submit will be processed.

Before proceeding further, you must read the notice below regarding how the OpenLine process works and how the personal information you report may be processed. You must then confirm you have read the notice by checking the box below. If you do not check the box below, you will not be able to proceed to submit a question or allegation through this system but instead are encouraged to report this matter to your local management, Human Resources, the Law Department, or Business Conduct Officer.

This confidential OpenLine on-line reporting portal is operated by NAVEX Global, a United States based company, on behalf of Northrop Grumman. Northrop Grumman’s contract with NAVEX Global requires NAVEX Global to comply with applicable privacy laws, to adequately secure your personal information, and not use it for any unauthorized purposes. For more information regarding the processing of your personal information by NAVEX Global, please refer to the Privacy Statement located on www.northropgrumman.ethicspoint.com.

Northrop Grumman is responsible for investigating all issues, allegations, or questions submitted as it deems appropriate. Northrop Grumman will process any personal information consistent with applicable company policies and procedures. A copy of the Privacy Statement covering Northrop Grumman’s Australian entities, which contains information on Northrop Grumman’s complaints procedure and how you can request access and corrections to personal information, may be obtained by emailing a request to privacy@ngc.au.com.

What Information is collected through this portal? The OpenLine captures the following information directly from you: your name, position and contact information, any question you may have, any allegations that you make, the name, position, and contact information of all individuals about whom you may be filing a report or asking a question, and a description of any alleged questionable conduct, including all relevant details.

How will the Information be used? All the information will be stored on the OpenLine database in the United States (“NAVEX Global”). NAVEX Global will generate a report that will be sent to Northrop Grumman. Unless otherwise required by law, the information in the OpenLine database may only be reviewed and used by those individuals at NAVEX Global who need to access the data to fulfill their job duties. The information you provide to us may be transferred to appropriate people within Northrop Grumman, including at its Australian subsidiaries, and - if necessary - to external advisors helping Northrop Grumman to investigate the matter. These individuals may be located outside of Australia,
including in the United States. Northrop Grumman and its external advisors will take reasonable steps to preserve the confidentiality and security of the personal data collected. No OpenLine user will be retaliated against for making a report to the best of his/her knowledge in "good faith."

Northrop Grumman encourages OpenLine Users to provide their name and contact information as this allows the company to contact you if further information is needed. Providing Northrop Grumman with your name will also ensure that your report qualifies for protection under Part 9.4AAA of the Corporations Act 2001 (Cth). If you do not provide Northrop Grumman with your name and contact information, it may be difficult for Northrop Grumman to conduct a thorough investigation. The company will keep your identity confidential to the fullest extent practicable, consistent with Northrop Grumman’s need to conduct a thorough investigation and/or protect the safety of people and its facilities and assets. The company will not otherwise disclose your identity unless otherwise required by law.

Please be aware that certain applicable data protection laws may require Northrop Grumman, subject to certain exceptions, to provide individuals with access to personal information about them that is held by Northrop Grumman. Where such a request is made by an individual and Northrop Grumman holds personal information about him or her relating to a report made through the OpenLine portal, Northrop Grumman will not disclose this information without your consent, to the extent such consent is required by law.