Northrop Grumman Corporation and its subsidiaries and affiliates (hereafter “Northrop Grumman” or “Company”) have a long-standing commitment to conduct business in compliance with all applicable laws and regulations and in accordance with the highest ethical principles. Compliance with Northrop Grumman’s legal and ethical obligations is the responsibility of every employee and any other individual covered by Northrop Grumman policies and procedures – as is the responsibility to report potential violations of those obligations. For the purpose of this Policy, “employees and other covered individuals” refers to all Northrop Grumman employees and other individuals subject to Northrop Grumman policies and procedures (e.g., contract labor workers, consultants).

Northrop Grumman has implemented multiple reporting vehicles and related procedures in order to facilitate the receipt, treatment and retention of reports by employees and other covered individuals as well as any other person who contacts the OpenLine (“OpenLine Users”) regarding potential violations of Northrop Grumman’s legal and ethical obligations. The telephonic and web-based reporting system (hereafter the “OpenLine”) is one such vehicle available to OpenLine Users.

In order to comply with certain requirements of European Union (EU) and other applicable data protection law and implementing national laws, Northrop Grumman has established this Privacy Statement and specific procedural rules for the implementation of the OpenLine (hereafter the “EU Notice”).

The following document intends to summarize and inform you about the EU OpenLine, which covers the EU and the European Economic Area ("EEA"). It applies and is available to all employees who are located in these regions. The entity responsible for the processing of your personal data in the context of the OpenLine (i.e., the “data controller”) is the subsidiary or affiliate of Northrop Grumman that employs you.

**Purpose and scope of the OpenLine**

The purpose of the OpenLine is to provide an alternative mechanism for our OpenLine Users to report concerns or allegations about financial, accounting, internal controls, bribery, corruption or related misconduct, as well as anti-competitive practices. The following matters can be reported through the OpenLine:

- Acceptance or Giving of Inappropriate Gifts, Services or Other Benefits;
- Embezzlement;
- Improper Accounting, Auditing or Financial Reporting or Internal Financial Control Deficiency;
- Improper Dealing with Competitors;
- Improper Dealing with Government Officials;
- Insider Trading, Tipping of Others to Trade, or Other Securities Violations;
- Theft of Company Funds;
- Improper Use of Competitor or Supplier Information;
- Unauthorized Use of Company Assets;
- Unauthorized Use of Company Funds; Other Concerns with Accounting, Auditing for Financial Reporting;
- Workplace discrimination and harassment;
- Workplace Retaliation
- Environmental issues;
• Workplace health and, hygiene;
• Workplace security;
• Quality (except in France)

The OpenLine should not be used to report on issues falling outside this scope. Please use Northrop Grumman’s regular information and reporting channels for such reports, including, reporting such concerns to your manager or another manager, Human Resources professional, Business Conduct Officer (BCO), or the Law Department.

How to report via the OpenLine

The use of the OpenLine by employees and other OpenLine Users in the EU is optional and voluntary. Employees and other OpenLine Users will not suffer any adverse consequences for not using the OpenLine.

The OpenLine supplements Northrop Grumman’s regular information and reporting channels. Whenever you have concerns that may need to be reported, you should first talk to your direct manager or supervisor. You also can use the “open door” policy to talk to someone else in management, including a Human Resources professional, the Law Department, a Business Conduct Officer or someone from the function with the expertise and responsibility to address the concern.

If, for whatever reason, you feel you cannot speak about your concerns with your manager or someone else in management, or if you think that your concerns have not been handled properly, and if your concerns fall within the scope of the Northrop Grumman EU OpenLine, you may report them through the OpenLine using one of the following mechanisms:

1. Calling the applicable toll-free OpenLine at the numbers indicated at http://www.northropgrumman.com/CorporateResponsibility/Ethics/Pages/EthicsContacts.aspx The OpenLine is staffed 24 hours a day, 365 days a year.

2. Logging onto http://www.northropgrumman.com/CorporateResponsibility/Ethics/Pages/EthicsContacts.aspx from any computer with an Internet connection and click on the OpenLine link to file a web report.

Anonymous reports

Whenever possible, OpenLine Users should provide their name and contact details when reporting concerns and allegations. This will allow Northrop Grumman to contact you if further information is needed. If you identify yourself, your identity will be kept confidential to the fullest extent practicable, consistent with Northrop Grumman’s need to conduct a thorough investigation and/or to protect the safety of the OpenLine User or other person or our facilities or assets. However, we may be required to disclose the OpenLine User’s identity as required by law, such as in response to a court or administrative order or equivalent legal requirement and to relevant persons involved in conducting the investigations and any subsequent adjudication.

Northrop Grumman will accept anonymous reports only to the extent consistent with applicable local law. For example, anonymous reports will not be processed in Spain and Portugal.

Personal data we collect

Northrop Grumman collects and processes personal data from OpenLine Users through the OpenLine to the extent necessary to prepare a report and conduct an appropriate follow-up investigation. In the context of a report, we may collect and process the following type of personal data:
- The identity, position and contact details of the person submitting a concern or report;
- The identity, position and contact details of the person who is reported;
- The identity, position and contact details of the persons receiving or investigating reports;
- The facts reported;
- The evidence gathered in the course of the investigation;
- The report of the investigation; and
- The outcome of the report.

In that context, Northrop Grumman shall endeavor not to collect and process sensitive personal data i.e., information about an individual's racial or ethnic origin, political opinions, religious beliefs, trade union membership, health, sexual life, and data relating to criminal convictions or criminal prosecutions. To the extent that such sensitive personal data is intrinsic to the OpenLine report, Northrop Grumman will endeavor to minimize any resulting collection and further processing of such data.

How we will handle reports

When a concern or allegation is introduced via the OpenLine, it will be processed promptly and confidentially by our third-party Service Provider. A report will be prepared by our Service Provider and then forwarded to the Northrop Grumman OpenLine Manager. The initial report will be reviewed by the OpenLine Manager and then forwarded to an appropriate Northrop Grumman representative responsible for investigation and follow-up. The report will be addressed by specially trained Northrop Grumman employees that may include representatives from Ethics, Corporate Compliance, Human Resources, the Law Department, Security, Internal Audit or other affected functions. Northrop Grumman may also use service providers such as law firms in reviewing a matter. Northrop Grumman and its service providers will take all reasonable and useful precautions to preserve the confidentiality and security of the personal data when it is gathered, communicated or retained.

Data Transfers

EU data protection laws restrict the transfer of personal data from an EEA Member State to a recipient outside the EEA where the destination country does not provide an “adequate” level of data protection. As Northrop Grumman is based in the U.S. and operates internationally and our OpenLine service provider is located in the U.S., personal data provided in the context of the OpenLine may be transferred for the purposes described above to the U.S. and other countries that have not been determined by the EU to provide an “adequate” level of data protection. Both Northrop Grumman and its OpenLine Service Provider are self-certified to the EU-U.S. Safe Harbor. U.S. companies complying with the U.S.-EU Safe Harbor are considered by the European Commission as ensuring an adequate level of data protection.

For a list of other countries outside the EEA where Northrop Grumman operates and might transfer personal data, please contact your HR professional. In case of a data transfer to other countries outside the EEA that have not been determined to have an adequate level of data protection, Northrop Grumman will take all appropriate steps to comply with the requirements of EU data protection law such as using the European Commission’s Standard Contractual Clauses or another legitimate cross-border transfer solution.

No-retaliation

No OpenLine User will be retaliated against in any way for making a report in “good faith.” “If an employee submits a report based on good faith allegations, he/she will not be disciplined or lose his/her job because of the report if the allegations are later found to be unsubstantiated or inaccurate, or if Northrop Grumman decides to close the matter. Anyone who attempts to retaliate, directly or indirectly, or encourages others to retaliate against any employee or other OpenLine User who
submitted good faith allegations or concerns, may be subject to disciplinary action or judicial proceedings, to the extent allowed by local law.

This no-retaliation protection does not extend to employees or other OpenLine users who knowingly or recklessly make statements or disclosures that are not in good faith (e.g., employees who maliciously raise concerns that they know to be untrue). In those circumstances, you may be subject to disciplinary action or judicial proceedings, to the extent allowed by local law.

**Your rights**

Subject to applicable law, you have the right to request access to and receive details about the personal data we maintain about you in connection with your report. You also have the right to request the rectification, blocking or deletion of any outdated or incorrect personal data in accordance with applicable law. You may object at any time, on legitimate grounds, to the processing of your personal data in the context of a report to the OpenLine.

If you are the subject of a report made through the OpenLine, you will be contacted as soon as practicable after any relevant evidence is first collected. We will inform you about:

- The Northrop Grumman entity or unit responsible for operating the OpenLine;
- The allegations against you;
- The persons, departments or entities of Northrop Grumman that may receive information or reports relating to the allegations; and
- How you can exercise any applicable rights of access, rectification, blocking or deletion of your personal data and how to object to the processing of your personal data;

You may receive this information at a later stage if and to the extent that informing you would prejudice or endanger the investigation and/or if it is necessary to take preventative measures to prevent destruction of evidence.

You will not, however, be told the identity of the employee or other OpenLine User who submitted the report through the OpenLine, unless we are obliged to disclose the identity of that person as a result of court action or in order to comply with local law requirements.

In order to exercise your rights, please use the instructions and contact details provided below.

**How long do we keep your personal data?** Personal data contained within the report will be destroyed or anonymized (i.e., removing all personal identifiers) as soon as practicable under the particular facts and circumstances, and if possible within two (2) months after the conclusion of the investigation, so long as the investigation does not lead to disciplinary action and/or a dispute. If disciplinary measures are imposed or a dispute arises, your personal data will be retained until final adjudication. Northrop Grumman endeavors to promptly destroy or anonymize any personal data outside the scope of the Northrop Grumman EU OpenLine.

**How to contact us**

If you have any questions or comments about the OpenLine, or if you would like to exercise your rights of access, rectification, blocking, deletion, or objection to the processing of your personal data, please contact the Northrop Grumman OpenLine Manager at the following address: 2980 Fairview Park Drive, Falls Church, VA USA 22042. All requests to exercise your rights of access, rectification, blocking, deletion, or objection to the processing of your personal data must be made in writing.

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