

OpenLine – European Union (EU)/ UK Privacy Notice

Last Updated 30 September 2025

This confidential OpenLine on-line reporting portal is operated by NAVEX, a United States-based company, on behalf of Northrop Grumman. 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 the UK, or an EEA country with data protection regulations that require you to be advised about, and consent to, certain aspects of how the personal information you submit will be processed.

Before proceeding further, you must read the below notice 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 Advisor.

Please be aware that this OpenLine Call Center and online submission tool can be used only to report allegations and questions relating to certain topics, under applicable UK/EEA data protection laws. The permitted topics are as follows:

- Acceptance or Giving of Inappropriate Gifts, Services or Other Benefits;
- Embezzlement;
- Improper Accounting, Auditing or Financial Reporting or Internal Financial Control
- Improper Dealing with Competitors;
- 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, hygiene;
- Workplace security;
- Quality, except in France.

Any concerns or questions pertaining to issues other than those listed in this notice cannot be accepted by this OpenLine Solution. Northrop Grumman, however, encourages you to report your concern or ask your question to local management, Human Resources, the Law Department or Business Conduct Advisor instead.

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 hosted by NAVEX in the USA. NAVEX 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 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 and - if necessary - to external advisors helping Northrop Grumman to investigate the matter. These individuals may be located outside of the EEA/UK, 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 in any way for making a report to the best of his/her knowledge in "good faith."

Legal Ground for Our Use of the Information: We will use the Information stated above to the extent necessary to achieve our legitimate interests in combating fraud and other criminal activity at the workplace; and in ensuring the safety of our employees and the continuity of our business in accordance with all applicable laws to which the group is subject, as the case may be.

Northrop Grumman encourages OpenLine Users to provide their name and contact information as this allows the company to reach you if further information is needed. 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 required by law.

Please be aware that certain applicable data protection laws may require Northrop Grumman to inform each person named in your report about the allegations made. Persons notified have the right to request correction of the information provided about them by you.

Information We Share: When calling "Open Line", users will speak with a specialist who will ask the user a series of questions to better understand the nature of the concern. The specialist will then prepare a report which will be forwarded to the appropriate internally appointed Business Conduct Advisor (BCA) for review, assignment and/or other action.

When making a report via Openline's online tool. The report will then be shared with the following as appropriate to the nature of the issue: local and/or corporate sector or line managers, local and/or corporate HR department, internal local and/or corporate legal departments or external legal departments, law enforcement or local government authorities, internal or external individual or individuals identified by reporters (authorized employees) for suspected violations, internal or external individual or individuals who could provide information relating to the suspected violation.

Your Rights: Subject to applicable law, you have the right to request access to and rectification or erasure of your Employee Information, or the restriction of our use of your Employee Information, or to object to such a use. Subject to applicable law, you also have the right to receive, in a structured, commonly used and machine-readable format, the Employee Information about you that you provided to us for the performance of your employment contract, and to transmit this information to a third party organization. You can exercise these rights by contacting

us as indicated in the “How to Contact Us” section below. In addition, you have the right to make a complaint with a data protection authority.

How we protect your Information. This confidential OpenLine on-line reporting portal is operated by NAVEX, a United States-based company, on behalf of Northrop Grumman. Northrop Grumman maintains administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. Northrop Grumman’s contract with NAVEX requires NAVEX to comply with applicable privacy laws, to adequately secure your personal information, and not use it for any unauthorized purposes

Transfer of your Information. Personal information you submit to OpenLine may be transferred to recipients in countries other than the country in which the information originally was collected, including to our Openline operator NAVEX in the United States (“U.S.”, and other countries where they operate their contact centers globally Those countries may not have the same data protection laws as the country in which you initially provided the information. If you are located in the European Economic Area (“EEA”), the United Kingdom (“UK”), or Switzerland, we comply with applicable legal requirements by protecting your information when it is transferred to countries outside of the EEA, the UK or Switzerland that have not been recognized by either the European Commission or the United Kingdom as providing an adequate level of data protection. The steps we take include concluding data transfer agreements incorporating the European Commission’s Standard Contractual Clauses or the United Kingdom’s International Data Transfer Agreement with the relevant data recipient or ensuring that the data recipient has implemented Binding Corporate Rules. You may obtain a copy of these agreements by contacting us at privacy@euro.ngc.com.

Further, Northrop Grumman and its U.S. subsidiaries complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Northrop Grumman and its U.S. subsidiaries has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Northrop Grumman and its U.S. subsidiaries has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy notice and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. [View our EU-U.S. and Swiss-U.S. Data Privacy Framework Privacy Notices and our participating US subsidiaries.](#) To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>. If you are located outside the EEA, the United Kingdom or Switzerland, you acknowledge that we may transfer the information to countries in which the laws may not offer the same level of data protection as the laws of your own country.

Data Retention: Data collected for this purpose will be retained for the necessary period of time that it serves the purpose for which it was originally collected or subsequently authorized and in accordance with applicable law. For example, a user's personal information will be retained for as long as an account is active and for as long as is necessary to comply with any legal obligations and rights, to resolve disputes, and to enforce contractual agreements.

Updates to This Privacy Notice: This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post the updated version on this website and indicate at the top of the notice when it was most recently updated.

How to Contact Us: If you would like to exercise your rights, or if you have any questions or comments about this Privacy Notice or the processing of personal information, please contact privacy@euro.ngc.com.