

Policy

The policy of ES is to maintain the highest standards of honesty, integrity, and trust in all aspects of our business and to meet all of its responsibilities to employees, customers, shareholders and to the nation.

ES considers compliance with ethical and legal obligations to be the responsibility of each employee and expects employees to follow company policies and procedures and support company goals and objectives. This commitment, which is the cornerstone of the company culture and leadership philosophy, is reflected in the following documents:

- Northrop Grumman Vision Values Behaviors
- Corporate Command Media Policy CP A4, *Ethics and Business Conduct*
- Corporate Command Media Procedure CO A201, *Employee/Supplier Standard of Conduct*
- Command Media Policy A02, *Management Principles*
- Standards of Business Conduct

ES shall conduct its business in compliance with this commitment as well as with applicable laws and regulations.

All employees are responsible for creating and promoting an ethical work climate. Employees in leadership positions are also responsible for leading by example.

ES encourages employees to ask questions, seek assistance and report potential violations through their local management. Employees are also provided avenues for confidential and anonymous reporting through the OpenLine process, as described in Corporate Command Media Procedure CO A202, *OpenLine*, and Command Media Procedure A171, *Voluntary Disclosure and OpenLine Reporting*.

ES will not condone any act of retribution or retaliation against any individual at Northrop Grumman who conscientiously seeks to follow and implement this policy.

Violations of Northrop Grumman's Standards of Conduct can result in disciplinary action up to and including discharge from the company.

To ensure compliance with this policy, a sector Ethics and Business Conduct Program shall be established consistent with the Corporate Ethics and Business Conduct Program. This program shall:

- Establish the high ethical standards expected of sector employees.
- Foster an atmosphere of confidentiality that encourages employee participation without fear of retaliation.

- Provide for monitoring of compliance with appropriate regulations and voluntary disclosure of actions taken.
- Provide for public accountability of the ES commitment to the principles of business ethics.

Responsibilities

Corporate Vice President and President, ES and other Executive Leaders

- Establish the importance of ethical leadership
- Regularly consider the ethical implications of their actions.
- Promote a positive environment throughout the sector.
- Apply the Company Values and Standards of Business Conduct in day-to-day actions.

The Vice President, Human Resources and Administration is responsible for implementing this policy.

References

Command Media	CP A4, Ethics and Business Conduct CO A201, Employee/Supplier Standards of Conduct CO A202, OpenLine A02, Voluntary Disclosure and OpenLine Reporting A171, Voluntary Disclosure and OpenLine Reporting
Other	Standards of Business Conduct Vision Values Behaviors