

Distribution of Company Ethics Procedures to Suppliers

June 7, 2003

Purpose

To ensure that major suppliers are informed of and will comply with the Northrop Grumman Values and Standards of Business Conduct.

Process

Each year the Procurement department shall determine which companies have achieved at least \$25,000 in ES business during the past year, and in compliance with Corporate **Procedure A201, Employee/Supplier Standards of Conduct**, shall ensure communication of the **Values, Ethics, and Business Conduct for Northrop Grumman Associates** has been accomplished. The Procurement department shall also distribute an annual letter reminding suppliers of Company gifts and gratuities rules. The letter should be signed by the Vice President, Procurement. Suppliers who violate the Northrop Grumman Values, Standards of Business Conduct, or gifts and gratuities rules shall be identified to the Procurement Department and Ethics Office.

Responsibilities

All Company management, including subsidiary companies and plants, that conduct business with the US Government shall comply with this procedure.

References

Command Media CO A201, Employee/Supplier Standards of Conduct

Other

Values, Ethics, and Business Conduct for Northrop Grumman Associates