

“We are committed to delivering the best possible performance while upholding the strong ethical standards that are the hallmark of Northrop Grumman.”



**Wes Bush**

Chief Executive Officer and President  
Northrop Grumman Corporation

**Internal reporting of possible violations:**

- Protects Northrop Grumman’s integrity and reputation for excellence;
- Enables Northrop Grumman to create a workplace where every employee can share a sense of ownership for Northrop Grumman’s success;
- Allows Northrop Grumman to pursue its business interests worldwide in a socially responsible manner; and
- Enables Northrop Grumman to conduct its business with the highest standards of legal and ethical conduct.

Open communication is especially important when our integrity as a company is compromised. Contact the OpenLine to raise concerns about:

- Time reporting (intentionally falsifying or misstating time)
- Mischarging (unallowable or shifting costs)
- Misuse of company resources/information
- Accounting issues
- Conflicts of interest (organizational, financial, personal)
- Customers or suppliers
- Quality/manufacturing
- Other ethical violations
- Export/import control compliance issues

Northrop Grumman OpenLine  
**800.247.4952 (toll-free)**

Web Reporting  
<https://www.compliance-helpline.com/northgrum.jsp>



**Ethics & Business Conduct**

*Linking people to Northrop Grumman values and behaviors.*

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**ETHICS**  
TAKE THE HIGH ROAD



**OPENLINE**

**800.247.4952 (toll-free)** 24 hours a day, 7 days a week

**Web Reporting:** <https://www.compliance-helpline.com/northgrum.jsp>

***NORTHROP GRUMMAN***

## **COMMUNICATION**

The importance of communication cannot be overstated. The actions of one may have a great affect on many — we are one Northrop Grumman. Proper behavior strengthens our values. At Northrop Grumman we value each employee and believe everyone deserves to work in a positive and productive environment. Communication at every level is the key to maintaining this type of environment.

## **OPEN DOORS**

Employees and managers are encouraged to maintain open channels of communication. In addition to work performance and employee development, discussions should include the importance of our company's Values and Standards of Business Conduct. Every supervisor and manager is encouraged to have an open door policy that enables employees to ask questions or raise concerns about any subject or issue that impacts their work environment. The "When to Challenge, When to Support" brochure, available on the Ethics & Business Conduct Web Site or through your Business Conduct Officer, provides guidance on employee-manager interactions.

## **OPENLINE**

The Northrop Grumman OpenLine offers an anonymous and confidential means to voice concerns or report a suspected violation of our Standards of Business Conduct without fear of recrimination or retaliation. The OpenLine is available 24 hours a day, seven days a week, and is administered by an external supplier.

When calling the OpenLine, you speak with a specialist who asks a series of questions to better understand the nature of your concern and to determine the routing for the subsequent report. Once the specialist completes the report, it is forwarded to the appropriate Business Conduct Officer for review, assignment and if necessary, investigation. The specialist provides a unique identification number at the end of the call to facilitate follow-up. If you provided contact information, expect to be contacted within 3 to 10 business days after filing the report.



**NORTHROP GRUMMAN OPENLINE**

**800.247.4952 (toll-free)**

**WEB REPORTING**

<https://www.compliance-helpline.com/northgrum.jsp>

**ETHICS & BUSINESS CONDUCT WEB SITE**

<http://home.northgrum.com/ethics/default.htm>

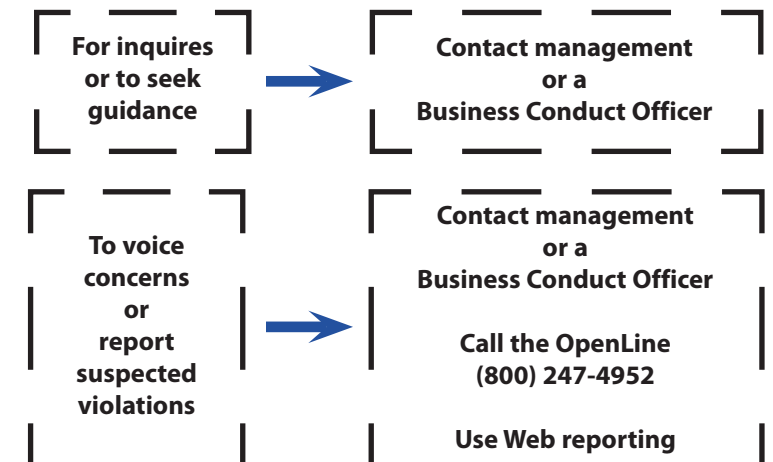
Northrop Grumman does not and will not tolerate direct or indirect retaliation against any individual who reports a concern. More information on our non-retaliation policy and our Standards of Business Conduct is available on the Ethics and Business Conduct Web site.

## **YOUR RESPONSIBILITY**

Each employee has a responsibility to act in accordance with the highest legal and ethical standards. When questions or concerns are raised to the appropriate source, the company has the responsibility to address the concern and correct or minimize the impact of an unethical situation.

If individuals witness or suspect that anyone is acting against our Standards of Business Conduct, they should raise the concern immediately via their management, Business Conduct Officer, the OpenLine, or Web Reporting.

## **ETHICS OR COMPLIANCE ISSUES**



## **BUSINESS CONDUCT OFFICER (BCO)**

A BCO is a neutral party who works for or represents the Northrop Grumman Ethics & Business Conduct Office. Employees may contact a BCO directly to seek answers to ethics questions, raise a concern, or to report a potential violation. BCO contact information is available on the Northrop Grumman Web site and on OpenLine posters located at your facility.

On matters related to internal Human Resources issues, such as performance discussions and discrimination in the workplace; you are encouraged to contact your Human Resources representative for assistance.