

# DISCLOSURE OF CONFLICTS OF INTEREST AND CERTIFICATE OF STANDARDS OF BUSINESS CONDUCT

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LAST NAME		FIRST NAME		M.I.
EMPLOYEE NO.	SECTOR	DIVISION (IF APPLICABLE)	MAIL STOP	

It is the responsibility of each employee to recognize and avoid any situation involving a business conflict of interest. Employees are expected to promptly disclose any known relationships or activities that may cause a real or perceived business conflict of interest. This information is disclosed to your supervisor/manager via the C-196 process and allows issues to be worked before they develop into a problem. Through this action, an employee protects their own interests as well as Northrop Grumman's. Refer to [CO No. A201](#), Conflicts of Interest, for guidance and definitions. When using this hard copy version of this form, attach additional pages to provide required information.

If your situation or circumstances are not specific to a question, use Question 7 to disclose your information. No additional research is required in answering the questions. Answer each question to the best of your knowledge.

**If you answer YES to Questions 1-4, provide the person's relationship to you; the business entity and location, and their position with that business; provide your Northrop Grumman job responsibilities and state whether you make management decisions, or participate in the selection of or evaluate the performance of any business associate. Indicate if you and the individual named are working on the same contract.**

QUESTION	YES	NO
1. Are you or any member of your family an <b>employee, officer, or director for any business associate</b> that does or seeks to do business with Northrop Grumman Corporation or its subsidiaries and affiliates?	<input type="checkbox"/>	<input type="checkbox"/>
2. Do you or any member of your family own, directly or indirectly, a <b>substantial financial interest</b> (as defined in a, b, c) in any current or prospective business associate's entity?		
A. Ten percent or more of the individual's net worth, excluding deposits in banks, trust companies, or savings and loan associations	<input type="checkbox"/>	<input type="checkbox"/>
B. At least a five percent interest in a publicly-traded company	<input type="checkbox"/>	<input type="checkbox"/>
C. Any interest in a non-publicly-traded company.	<input type="checkbox"/>	<input type="checkbox"/>

**If you answer YES to Questions 3 A-D, provide the information requested above and also indicate what was received, the purpose of the business courtesy, and the estimated value.**

3. During the last year, have you or any member of your family <b>received, directly or indirectly</b> , from a current or prospective business associate any of the following which have a value in excess of \$20.00?	YES	NO
A. Any travel or entertainment?	<input type="checkbox"/>	<input type="checkbox"/>
B. Any gifts, gratuities, or anything of value?	<input type="checkbox"/>	<input type="checkbox"/>
C. Any cash, free or discounted services, or free or discounted use of facilities? Note: this does not include discounted services offered by Northrop Grumman Employee Services.	<input type="checkbox"/>	<input type="checkbox"/>
D. Any compensation, commissions, fees, services, honorariums, or payments of any kind?	<input type="checkbox"/>	<input type="checkbox"/>

**If you answer YES to Question 4, provide the information requested above and also provide the circumstances of the transaction.**

QUESTION	YES	NO
4. Has a <b>debtor/creditor relationship</b> existed at any time in the last year between you or any member of your family and a business associate? (Excludes loan/credit transactions at current market rates).	<input type="checkbox"/>	<input type="checkbox"/>

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**If you answer YES to Question 5, explain the information revealed or used, to whom, and under what circumstances.**

QUESTION	YES	NO
5. Have you directly or indirectly <b>revealed company proprietary matters</b> to any unauthorized persons or have you used company proprietary information in any way to promote your own business or personal interests?	<input type="checkbox"/>	<input type="checkbox"/>

**If you answer YES to Question 6, explain the information received or revealed, from/to whom, and under what circumstances. Indicate if you reported this to the Law Department.**

QUESTION	YES	NO
6. Have you <b>improperly received or revealed</b> bid and proposal information or proprietary or source selection information pertaining to a competitor of Northrop Grumman?	<input type="checkbox"/>	<input type="checkbox"/>

**If you answer YES to Question 7, explain the interest or arrangement and provide a brief description of your Northrop Grumman job responsibilities.**

QUESTION	YES	NO
7. Do you or any member of your family have <b>any other interest or arrangement</b> which may violate the Standards of Business Conduct or may otherwise result in an actual or perceived conflict of interest?	<input type="checkbox"/>	<input type="checkbox"/>

## CERTIFICATION

I have read, understand my responsibilities and have and will comply with [CTM No. A210](#) Northrop Grumman Standards of Business Conduct. I will update this information if any situation or fact arises that would make my responses incomplete.

EMPLOYEE SIGNATURE	DATE
IMMEDIATE MANAGEMENT SIGNATURE IF ANY QUESTION IS ANSWERED YES.	DATE