

ANTI-HUMAN TRAFFICKING STATEMENT

As a responsible corporate citizen, Northrop Grumman fully supports the elimination of human trafficking and slavery from the supply chain and the transparent disclosure of our efforts in this regard consistent with the requirements of the California Transparency in Supply Chains Act of 2010 and the United Kingdom's Modern Slavery Act of 2015.

We do not tolerate trafficking in persons, both in the U.S. and globally, including the procurement of commercial sex acts, the use of forced labor and all related conduct.

For information regarding actions we have taken in the prior year in support of our effort to ensure that human trafficking and slavery are not taking place in our supply chain or in any part of our business, please see our most recent Corporate Responsibility Report.

Verification of Supply Chain and Evaluation of Risk

We believe that the nature of our business and the regulatory environment in which we operate mitigate the risk of human trafficking and slavery taking place within our business and our supply chain. We require prospective suppliers to complete a due diligence process during which we: (1) collect information from the supplier; (2) review the supplier's reputation and background; and (3) complete a risk based assessment of both the location of the supplier and the proposed scope of work. Subcontractors or suppliers that pose potentially higher risks of human trafficking and/or slavery are subject to more detailed risk assessments and additional oversight, if necessary, to help ensure compliance with our internal controls and applicable law.

Required Compliance with Law

In general, our suppliers are contractually required to comply with applicable laws and regulations in the U.S. and globally in providing us manufactured goods, products and services and are expected to adhere to our Northrop Grumman Supplier Standards of Business Conduct.

As a U.S. Government contractor, we are also governed by and comply with Federal Acquisition Regulation (FAR) 52.222-50 on Combating Trafficking in Persons. As a result, we flow down the FAR 52.222-50 requirement to all covered suppliers, subcontractors, and agents. We also require our suppliers to provide certifications of compliance with respect to their plans regarding anti-human trafficking where required by the FAR.

Suppliers that fail to adhere to these requirements are subject to sanctions, including, but not limited to, termination of their agreements with us for default.

Maintenance of Ethics and Compliance Program and Accountability

We maintain a broad-based corporate ethics and compliance program that addresses values, leadership, training, audits, certifications and accountability and is intended to ensure compliance with applicable laws and a culture committed to ethics and integrity in all we do. In keeping with this commitment, we maintain robust, global

supply chain programs, practices and procedures to support the goal of ensuring that our suppliers meet our strong ethical standards and comply with applicable laws and regulations, including those prohibiting human trafficking and forced labor.

In addition, our employees are responsible for complying with our internal controls that seeks to combat human trafficking and forced labor. Northrop Grumman employees found to be in violation of this procedure are subject to discipline, up to and including termination.

Training of Relevant Employees

Northrop Grumman provides training and awareness on human trafficking and forced labor to employees and promotes targeted awareness through various methods, including online training modules, corporate communication campaigns, ethics articles, posters at applicable work sites and postings on internal Northrop Grumman websites. Employees that have direct contact with our suppliers are required to complete additional awareness training.

Reporting Violations and/or Concerns

We expect and encourage our employees to raise any concerns regarding violations of law, regulations or our standards of business conduct by using one of several reporting channels we offer, including our corporate OpenLine which permits anonymous reporting. We also provide reporting channels, including our OpenLine, to our suppliers who we also expect to raise concerns. We have established human trafficking as a specific category for reports. Reports can be made without fear of retaliation which we do not tolerate.

As adopted, June 28, 2017.