

## **Northrop Grumman Corporation Anti-Corruption Compliance Program**

At Northrop Grumman, our unwavering commitment to anti-corruption compliance is built on and reflects our underlying values and culture. We strive to conduct all business consistent with our high ethical standards and in compliance with all applicable laws.

Our comprehensive global anti-corruption compliance program is critical to our global strategy and enabling us to continue as a trusted supplier for our customers, a reliable performer for our shareholders, and an employer of choice for our talented workforce. We have zero-tolerance for bribery and our anti-corruption compliance policies and procedures explicitly prohibit receiving or offering bribes, paying bribes or any other instance of improperly offering or providing something of value, directly or indirectly, to progress our business. Our anti-corruption compliance program applies to all Northrop Grumman employees, officers and directors. It sets clear standards, mandates robust training, enables effective audits, and provides for prompt and thorough investigations and remedial action in the event concerns arise.

We thoroughly vet third parties, and we require them to conduct any business on behalf of Northrop Grumman consistent with our high ethical standards and Northrop Grumman's [Standards of Business Conduct for Suppliers and Other Trading Partners](#), and in full compliance with all applicable laws.

We understand that the risk of corruption can arise in connection with many different business activities. Therefore, the Company's anti-corruption compliance program includes both broad-based components and targeted policies and procedures aimed at particular areas of potential risk and prevention. These targeted policies and procedures are integrated into the broader anti-corruption compliance program and include areas of focus, such as, giving and receiving business courtesies, conflicts of interest, third party due diligence, facilitating payments, personal protection payments, charitable and political donations, offset obligations, and detection, reporting and monitoring. We repeatedly assess and enhance the strength of our anti-corruption compliance program, with the assistance of internal and external subject matter experts and with reference to government guidance and best practices. For more information regarding Northrop Grumman's anti-corruption compliance program, please visit our webpage at [Anti-Corruption Compliance at Northrop Grumman](#).