

Northrop Grumman Systems Corporation

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Subject: Notice Regarding Anti-Human Trafficking Compliance Obligations

As a valued Northrop Grumman supplier, this communication is intended to remind you of your obligations under our Standards of Business Conduct for Suppliers and Other Trading Partners, as well as applicable U.S. and foreign laws that prohibit trafficking in persons and modern slavery practices.

Northrop Grumman is committed to serving as a responsible corporate citizen consistent with our Values throughout our global operations. We fully support the elimination of human trafficking, forced labor and modern slavery throughout our businesses and supply chains, including use of forced or child labor and the procurement of commercial sex acts. We have implemented comprehensive policies, procedures, contractual terms and codes of conduct that require our employees and suppliers to comply with applicable U.S. and foreign anti-human trafficking laws. This includes, but is not limited to, the requirements under the Federal Acquisition Regulation (“FAR”), the UK Modern Slavery Act and the Australian Modern Slavery Act.

Please take the time to review each of the documents and resources below that all Northrop Grumman suppliers are obliged to comply with:

Northrop Grumman Standards of Business Conduct for Suppliers and Other Trading Partners

We expect our suppliers (and those who work for them, including employees and subcontractors) at all tiers to comply with our Standards of Business Conduct for Suppliers and Other Trading Partners, which sets forth certain fundamental requirements, including those related to human trafficking. Click here to access a copy of our [Standards of Business Conduct for Suppliers and Other Trading Partners](#).

Northrop Grumman Standards Terms & Conditions

Our [Standard Terms & Conditions](#) also expressly prohibit trafficking in persons, including the use of forced and child labor, and require our suppliers, their employees, agents, contract laborers and subcontractors to notify Northrop Grumman in the event of any actual or suspected human trafficking violation.

FAR Requirements

The United States Government (“USG”) has a longstanding policy prohibiting contractors and their subcontractors from engaging in human trafficking and related activities, and related FAR requirements further strengthen this policy against human trafficking.

FAR 52.222-50, Combating Trafficking in Persons

This clause prohibits “trafficking-related activities.” The prohibitions include, among others, denying an employee access to his/her own identification or immigration documents, engaging in fraudulent recruitment practices, and charging recruitment fees directly to employees. These prohibitions apply to contractors, subcontractors, as well as each of their employees and agents.

FAR 52.222-50 is a mandatory flow down in all purchase orders and subcontracts at every tier issued under a USG prime contract.

In addition to other remedies available to Northrop Grumman and the USG, a supplier's failure to comply with the requirements of paragraphs (c), (d), (g), (h), or (i) of FAR 52.222-50 may result in:

- (1) Requiring the supplier to remove a supplier employee or employees from performance of the subcontract;
- (2) Requiring the supplier to terminate a subcontract;
- (3) Suspension of subcontract payments until the supplier has taken appropriate remedial action;
- (4) Loss of award fee, consistent with the award fee plan, for the performance period in which the USG determined supplier non-compliance;
- (5) Declining to exercise available options under the subcontract;
- (6) Termination of the supplier's subcontract for default or cause, in accordance with the termination clause of the subcontract; or
- (7) Suspension or debarment.

The FAR requires contractors to provide notification to its employees of the USG's policy prohibiting trafficking in persons, and the actions to be taken against employees or agents for violations of that policy. Contractor's employees must be notified that such actions may include, but are not limited to, removal from the subcontract, reduction in benefits, or termination of employment.

The FAR also requires that when a contractor becomes aware of any "credible information" from any source alleging human trafficking violations by one of its employees, agents, a subcontractor, or subcontractor employee, that supplier must "immediately" inform Northrop Grumman and the agency Inspector General of the allegations, along with any actions taken by the supplier in response.

FAR 52.222-56, Certification Regarding Trafficking in Persons Compliance Plan

This clause requires contractors like Northrop Grumman who propose acquisition of products (other than commercially available off-the-shelf items) from outside the United States with an estimated value that exceeds \$550,000, to implement a human trafficking compliance plan. In accordance with FAR 52.222-50, such plans are expected to be "appropriate" to the "size and complexity of the contract" and the "nature and scope of the activities to be performed." The regulation includes specific minimum requirements for a compliance plan, including the monitoring and detection of prohibited activities across our supply chain.

Requirements Overview

In addition to the above requirements, we request that you/your organization please review the following: [Supplier Anti-Human Trafficking Requirements Overview](#) .

Questions

If you have any questions or concerns regarding the information included in this letter, please contact your assigned Northrop Grumman Buyer/Subcontract Administrator at NorthropGrummanSupplyChain@ngc.com. Thank you.