

Northrop Grumman Corporation
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Subject: Notice Regarding Anti-Human Trafficking Compliance Obligations

Northrop Grumman fully supports the prevention of human trafficking and all forms of modern slavery from our global operations, including our supply chain. We are committed to conducting our business with the highest standards of integrity and ethical conduct. Central to this commitment is our zero-tolerance policy toward any form of modern slavery, including human trafficking, the use of forced or child labor, bonded labor, procurement of commercial sex acts, and all other forms of exploitative practices that use coercion, deception, threats or abuse of power to exploit vulnerable victims.

Our commitment to ethical sourcing is implemented through our Company Values, our robust policies and procedures, and our [Standards of Business Conduct for Suppliers and Other Trading Partners](#), which mandates that all Suppliers and other trading partners in all tiers of the supply chain (including those who work for them, such as employees and subcontract labor) (collectively, “Suppliers”) strictly prohibit human trafficking and forced labor and comply with all applicable laws, including, but not limited to, the requirements of the Federal Acquisition Regulation (“FAR”), trade restrictions against imports made with forced labor, and laws requiring public disclosure of relevant risks and due diligence efforts..

As part of Northrop Grumman’s ongoing engagement with suppliers on this important topic, we are reminding all Suppliers of their obligations under the Northrop Grumman Standards of Business Conduct for Suppliers and other Trading Partners and related requirements of the FAR (to the extent applicable). As such, this letter is intended to raise awareness – it in no way alters, amends, or modifies any contractual or other legal obligations of the supplier to Northrop Grumman, the United States Government, or any other parties.

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

All Suppliers are required to comply with our Standards of Business Conduct for Suppliers and Other Trading Partners, which can be accessed using the following link:

<https://www.northropgrumman.com/corporate-responsibility/ethics-and-business-conduct/standards-of-business-conduct>

We expect our Suppliers to flow down these standards and compliance expectations to their own subcontractors and lower-tier Suppliers to the extent they support Northrop Grumman business.

In addition, our [Standard Terms & Conditions](#) expressly prohibit trafficking in persons, the use of forced labor, and requires our Suppliers and subcontractors to notify us immediately in the event of any actual or suspected human trafficking violation.

FAR Requirements and Expectations for Suppliers

The United States Government (“USG”) has a longstanding policy prohibiting USG contractors (such as Northrop Grumman when contracting with USG) and their subcontractors from engaging in human trafficking and related activities, and related FAR regulations further strengthen this policy against human trafficking. As a USG contractor, Northrop Grumman is subject to the FAR requirements, including 52.222-50, *Combating Trafficking in Persons*, and FAR 52.222-56, *Certification Regarding Trafficking in Persons Compliance Plan*.

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

Based on these FAR requirements and other applicable laws regarding human trafficking and forced labor, Northrop Grumman expects Suppliers to:

- Cooperate with Northrop Grumman’s due diligence activities. Depending on the circumstances, such cooperation may include responding to requests for information and/or documentation, cooperating with audits, assisting with investigations, executing action plans to mitigate risks, and facilitating remediation, among other activities to comply with Northrop Grumman’s standards and applicable laws.
- Develop risk-based human trafficking compliance programs when required under FAR and/or agreements with Northrop Grumman and implement appropriate due diligence processes to manage risks of human trafficking, forced labor, and other human rights abuses in supply chains.
- Provide certifications regarding human trafficking compliance and related matters when requested by Northrop Grumman.
- Immediately report any suspicions or incidents of human trafficking, forced labor, or other human rights abuses to Northrop Grumman, so that Northrop Grumman can comply with its obligations to immediately notify the USG regarding any credible information regarding allegations of human trafficking.
- Ensure that employees, sub-suppliers, and agents are fully aware of Northrop Grumman’s standards and USG prohibitions regarding human trafficking, and potential consequences for violations, including potential removal from the subcontract, reduction in benefits, or termination of employment.

Potential Consequences for Violations

In addition to other remedies available to Northrop Grumman and the USG, a supplier’s failure to comply with the requirements 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.

Training

In addition to reviewing the above regulations and referenced documentation, Northrop Grumman also encourages your organization to review its [Supplier Anti-Human Trafficking Requirements Overview](#) training.

Please contact your Northrop Grumman Buyer/Subcontract Administrator for questions related to any specific procurements or the Corporate Global Supply Chain Compliance Office at NorthropGrummanSupplyChain@ngc.com for general questions.