

# WORKFLOW

Once a case is entered into the workflow system, the report will be forwarded to the appropriate Ethics Office for review, assignment and if necessary, investigation.

## THE OPENLINE AT WORK

The Northrop Grumman OpenLine process allows you to bring issues forward through a variety of methods including: going directly to your BCO, web submittal and by phone.



# GETTING HELP

At Northrop Grumman, you have many resources that can provide guidance. You may contact any of the following:

- Your manager, or another manager you trust
- A Business Conduct Officer (BCO), a member of our Law Department or Human Resources
- The Openline or the OpenLine Web Portal

**Northrop Grumman Web Portal**  
[www.northropgrumman.ethicspoint.com](http://www.northropgrumman.ethicspoint.com)

**Northrop Grumman OpenLine**  
 Toll-free and available 24/7; answered by an independent third party

United States	1-800-247-4952
Belgium	0041 43 300 6805
Denmark	0041 43 300 6805
France	0041 43 300 6805
Germany	0041 43 300 6805
Italy	0041 43 300 6805
Netherlands	0041 43 300 6805
Norway	0041 43 300 6805
Switzerland	0-800-890011 ID (844) 286-0069
United Kingdom	0808-234-6456
Australia	1-800-07-9315
Saudi Arabia	1-800-10 ID (844) 286-0069
UAE	800-555-66 or 8000-021 ID (844) 286-0069
China	10-800-711-1007 or 10-800-110-0935
Japan	00531-11-2025, 0066-33-830278 or 0034-800-900365
Taiwan	00801-10-4175
South Korea	00798-14-800-6599, 00308-110-480 or 00798-1-1-009-8084

**ETHICS**  
 OWN IT  
 LIVE IT  
 LEAD IT

**NORTHROP GRUMMAN**

# THE OPENLINE PROCESS



Each employee has a responsibility to act in accordance with the highest ethical and legal standards and raise concerns. When questions or concerns are raised to the appropriate source, the company has the responsibility to address the concern and correct or minimize the impact of an unethical situation.

## NORTHROP GRUMMAN OPENLINE PROCESS

The Northrop Grumman OpenLine is a confidential means to raise concerns or report a suspected violation of our Standards of Business Conduct. When we refer to our OpenLine, we are talking about not only our toll free number, but also our business conduct officer network, web reporting, e-mail, letters, etc. – basically any **OPEN LINE** of communication.

If you witness or suspect that anyone is acting against our Standards of Business Conduct, you should first discuss the situation with your manager or supervisor. If that is not possible, try contacting the following:

- Talk to another manager you trust
- Reach out to your BCO
  - You can locate your BCO on the ethics page of our intranet or ICI website
- Law Department
- Human Resources
- OpenLine Phone or Web Portal

### What Is a Business Conduct Officer (BCO)?

A BCO is a neutral party who works for or represents our Ethics & Business Conduct Office. Employees may contact a BCO directly to seek answers to ethics questions, raise concerns, or to report a potential violation.

### What Can I Expect When I Contact My BCO or the Ethics Office?

If you contact the Ethics Office with a question, we will provide you with guidance. When you contact the Ethics Office with an allegation of wrongdoing, here is what you can expect:

- Your concern is taken seriously
- Your communication is protected to the greatest extent possible
- Your concern is reviewed and thoroughly investigated, if warranted
- You are contacted when the investigation is complete.

(NOTE: You will not be advised of any discipline administered related to your concern, as we must protect the privacy of the individual(s) impacted)

### Who Answers the Toll Free OpenLine Number?

Our OpenLine is answered by an independent third party vendor, who has trained representatives to answer the calls.

### What Information Will I Be Asked to Provide?

Whether you call the OpenLine number, submit a web report or talk to a BCO, you will be asked to provide details concerning the issue, including where the incident took place, when it happened and how long it has been going on, who was involved and any potential witnesses.

### Can I Remain Anonymous?

If you call the toll-free number or submit a web report, you do have the ability to remain anonymous; however this does make it more difficult for us to look into your concerns since we cannot contact you for additional information if needed. Anonymous submissions may not be accepted in some countries.

### How Long Does It Take for an Allegation to be Investigated?

An investigation can take anywhere from a few days to several months, depending on the complexity of the issue.

### What Is Our Policy on Retaliation?

Northrop Grumman will not condone any act of retribution or retaliation against any individual at Northrop Grumman who brings issues forward in good faith.

### What Types of Issues Should I Report Through the OpenLine Process?

Allegation categories vary by country. Here are some categories of issues that can be raised through the process:

#### Business Allegations (Ethics)

- Time Reporting/ Mischarging/Overpayments
- Misuse of Company Resources
- Accounting Matters
- Conflicts of Interest
- Environmental, Health and Safety
- Quality/Manufacturing
- Intellectual Property/ Proprietary Information
- Security
- Government Contracts, Non-compliance & Regulations
- Kickbacks/Gratuities/ Bribery
- Export/Import Control
- Procurement Integrity and Irregularities

#### Workplace Allegations (Employee Relations)

- Discrimination Policy Violation
- Harassment Policy Violation
- Employee Misconduct
- Employment Practices
- Retaliation Policy Violation