

Anti-Human Trafficking and Slavery Statement

Northrop Grumman is a leading global security company. We offer a broad portfolio of capabilities and technologies that enable us to deliver innovative platforms, systems and solutions for applications that range from undersea to outer space and into cyberspace. We conduct most of our business with the U.S. Government, principally the U.S. Department of Defense (DoD) and intelligence community. We also conduct business with national and other governments outside of the U.S., as well as commercial customers. In 2018, we completed our acquisition of Orbital ATK, Inc. Orbital ATK became a wholly-owned subsidiary of the Company and was established as our fourth business sector, Innovation Systems, joining our other business sectors - Aerospace Systems, Mission Systems and Technology Services. Our principal executive offices are located in Falls Church, Virginia, U.S.A. and we have a global presence outside of the U.S., including in Europe, the Middle East and the Asia Pacific region. We regard our suppliers as essential team members. In 2018, we utilized a broad base of suppliers, spanning all 50 U.S. states and approximately 45 countries.

Northrop Grumman Policy on Human Trafficking, Modern Slavery and Human Rights

The Company is strongly committed to supporting and maintaining the highest standards of ethical conduct and respect for human rights. This respect is embedded in the Company's culture and reflected in the Company's Human Rights Policy adopted in 2013. As a responsible corporate citizen, Northrop Grumman fully supports the elimination of human trafficking and slavery, including from the supply chain at all tiers. Our policies, practices and procedures reflect our commitment to human rights as set forth in the Universal Declaration of Human Rights and sound employment practices.

Northrop Grumman does not tolerate trafficking in persons, including the procurement of commercial sex acts, and the use of forced or child labor. We believe the transparent disclosure of our anti-human trafficking efforts is critical and we report consistent with the requirements of the United Kingdom's Modern Slavery Act of 2015 and the California Transparency in Supply Chains Act of 2010 (USA). We have comprehensive policies and procedures, including our [Supplier Standards of Business Conduct \(SSOBC\)](#), which require our employees and suppliers to comply with applicable law, behave in an ethical manner and ensure the integrity of their operations in support of our programs. Acting with integrity includes being accountable for the highest standards of behavior. We expect our suppliers to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity, and foster an inclusive and ethical culture. Suppliers must refrain from violating the rights of others and address any adverse human rights impacts of their operations. Suppliers are required to ensure that child labor is not used in the performance of our work.

We believe our SSOBC helps to mitigate the risk of human trafficking in our supply chain. In addition, our standard procurement terms and conditions contain provisions requiring our suppliers to comply fully with all applicable laws and regulations, including explicit obligations regarding anti-human trafficking. We also have a robust, enterprise-wide compliance program to help ensure that we do business only with parties that share our corporate values for integrity and adhere to transparent and ethical business practices.

Due Diligence /Verification of Supply Chain, Evaluation of Risk and Compliance

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) conduct a risk-based assessment of certain suppliers operating in international locations. Suppliers that pose potentially higher risks of human trafficking and/or slavery may be subject to more detailed risk assessments and additional oversight including physical inspections, if necessary, to help ensure compliance with our policies and procedures and applicable law.

If a supplier violates our SSOBC, contract provisions or applicable legal requirements, we pursue appropriate corrective action to remedy the situation. In the case of an actual or possible violation of law or regulation, we may be legally required to make a report to proper authorities. We also reserve the right to terminate our relationship for misconduct or to take any other appropriate action with any supplier under the terms of our contract.

U.S. Government Contracts

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. 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.

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.

Our employees are responsible for complying with our Standards of Business Conduct and other policies and procedures, including those that seek 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 and Suppliers

We provide targeted training and awareness on human trafficking and forced labor 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 who have direct contact with our suppliers are required to complete additional awareness training. We also provide awareness training to our suppliers through materials that are published on the Northrop Grumman Supplier portal (OASIS). We periodically refresh our training provided to employees and suppliers to ensure that such training remains current with applicable law and other requirements.

Reporting Violations and/or Concerns

We expect and ask our employees to raise any concerns regarding violations of law, regulations or our SSOBC. We provide various reporting channels, 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. Good faith reports can be made without fear of retaliation, which we do not tolerate.

Review of Anti-Human Trafficking Efforts

We periodically review our anti-human trafficking mitigation efforts in light of our ongoing compliance obligations to monitor effectiveness and to ensure consistency with our Values, which are:

- We take responsibility for QUALITY;
- We deliver CUSTOMER SATISFACTION;
- We provide LEADERSHIP as a company and as individuals;
- We act with INTEGRITY in all we do;
- We value PEOPLE;
- We focus on SAFETY; and
- We regard our SUPPLIERS as essential team members.

We will continue to review and enhance as appropriate our efforts to prevent human trafficking and other misconduct within our global supply chain.

To review our prior years Anti-Human Trafficking and Slavery Statement, please follow the links below.

- [2017 Anti-Human Trafficking and Slavery Statement](#)
- [2016 Anti-Human Trafficking and Slavery Statement](#)

For additional information regarding our expectations of our suppliers and our commitment to human rights, please refer to our [Supplier Standards of Business Conduct](#) and [Human Rights Policy](#).

The above statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 for the fiscal year ended December 31, 2018.

Signed on behalf of the Board of Directors of NGC UK Limited

Signed,



Roger Wiltshire

Director