

Standards of Business Conduct

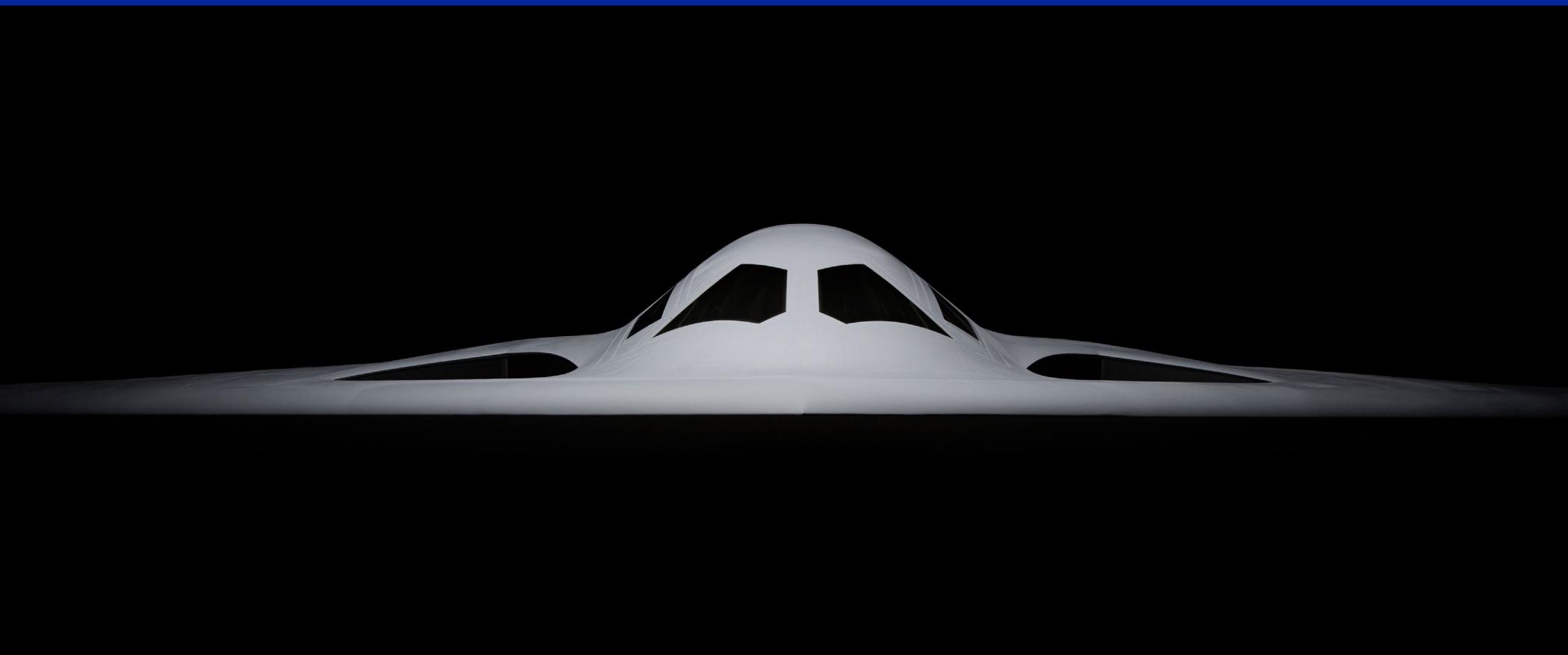


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Own It, Live It, Lead It

Our Values

Our Values support our ability to deliver on our shared purpose; they reflect who we are and how we treat others; they define who we are as a people and a culture, and how we act and operate.

Our Values reaffirm what is important to us and explicitly state what we should expect from our company and from one another. This is what makes our company special.



We do the right thing

We earn trust, act with integrity and transparency, treat everyone with respect, and value diverse perspectives.

At Northrop Grumman, we are committed to doing the right thing and to leading the way with high standards of ethics and integrity, which are integral to maintaining our reputation as a top performer in our industry. Abiding by our Standards of Business Conduct, Our Values and the applicable laws of the countries where we do business enables us to perform, consistent with legal requirements. It is also an important statement about who we are and how we operate.

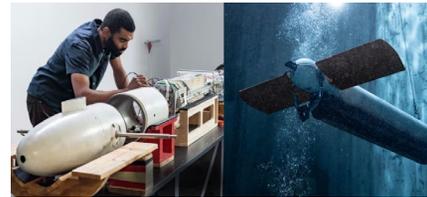


We do what we promise

We own the delivery of results, focused on quality outcomes and delighting our customers.

This commitment applies to each of us at Northrop Grumman, regardless of position or level of authority. In addition to our employees, Our Values apply to our Board of Directors, consultants, agents, contractors and other third parties who are authorized to act on our company's behalf.

We are each responsible for abiding by the Standards of Business Conduct, complying with applicable laws and regulations, and ensuring the integrity of our actions and decisions, regardless of where we work or what we do at Northrop Grumman.



We commit to shared success

We work together to focus on the mission and take accountability for sustainable success for our people, customers, shareholders, suppliers and communities.

All Northrop Grumman employees are expected to set good examples and treat others with civility and respect to create and sustain an open work environment where everyone is safe to voice their opinions and concerns.



We pioneer

With fierce curiosity, dedication and innovation, we seek to solve the world's most challenging problems.

A positive work environment improves synergy, satisfaction and productivity. It fosters creativity and innovation, helping us to define possible.

A Message from the Chair, Chief Executive Officer and President



To my colleagues:

Our commitment to the highest standards of ethics, integrity and transparency underpins our success. With each achievement, we demonstrate the power of our company Values, working together to create a stronger, more inclusive workplace.

Each of us around the globe are responsible for upholding those Values, acting with integrity, and conducting ourselves in a way that makes our team proud. All employees should read and understand our Standards of Business Conduct. It is every employee's go-to resource for business conduct questions or concerns.

We are incredibly proud of the innovative and pioneering solutions developed by our Northrop Grumman team. The diverse backgrounds, perspectives and experiences of our people help to deliver mission success and build a culture where everyone is empowered to thrive.

Doing the right thing is the foundation of our culture. We are all empowered and encouraged to raise issues early and often. If you discover a situation that doesn't feel ethical, report it to your manager, a business conduct advisor, the Law department or through the company's 24/7 OpenLine number or website.

Please also keep this information in mind as we serve our customers, our communities, our shareholders and each other.

Thank you for your commitment to our Values and our mission.

Sincerely,

A handwritten signature in black ink that reads "Kathy". The signature is fluid and cursive, with a large loop at the end.

Kathy Warden, Chair, Chief Executive Officer and President

A Guide to Making Ethical Decisions

Northrop Grumman expects all employees to always act ethically and make decisions in the best interest of our company. In recognizing that not every dilemma has an obvious answer, the Ethical Decision Guide, below, is a resource designed to help employees work through challenging situations.

JUDGMENT

Understand the nature of the ethical dilemma. Most ethical concerns are brought to light because you feel something isn't right.

- What is the ethical nature of the dilemma?
- Is there a legal, regulatory or quality concern?
- Does it conflict with Northrop Grumman's Values, policies, procedures or Standards of Business Conduct?

IMPACT

Consider the dilemma and how it may impact your role, the program, the company or other employees.

- Who will be affected or impacted?
- What would a reasonable person think?
- How would I explain my decision to my manager or my family?

COMMUNICATION

Have the courage to speak up and raise your concerns with respect and an open mind.

Our Responsibility to Ask Questions and Raise Concerns

One of the most important responsibilities under the Standards of Business Conduct is also one of the most basic: speaking up when we have a question or concern. Everyone at Northrop Grumman is encouraged to seek guidance when needed and required to report any activity that might violate our Standards of Business Conduct or other guidelines.

If you learn about wrongdoing, or potential wrongdoing, it is your responsibility and duty as a Northrop Grumman employee to report it.

Reporting is not always easy. Reporting what you think might be wrongdoing can feel uncomfortable, especially when you are not certain that you know all the facts.

Reporting misconduct or suspected misconduct allows our company to evaluate and promptly address problems, often preventing issues from escalating or reoccurring, making Northrop Grumman a better place to work. So, when in doubt, talk to someone about your concern. There are various Ethics Resources available to help. Simply contact any of the following:

- Your manager, or another manager you trust
- A Business Conduct Advisor (BCA)
- A member of the Law Department
- A Human Resources representative
- The Northrop Grumman OpenLine or the OpenLine web portal

To the extent we reasonably can and as required by applicable law, reports are kept confidential. If you choose to make your report through the OpenLine, either by phone or web portal, you are encouraged to provide your contact information so we can follow up with you for additional information, as needed.

If you choose, you can report allegations or concerns anonymously, as permitted under local law. But please note, it will likely be more difficult to conduct a thorough investigation of your report if we do not have your contact information to use in need of a follow up. For this reason, you are encouraged to share your contact information when making a report.

Retaliation Has No Place Here

We all have the opportunity to openly and honestly communicate and raise topics of concern without fear of retaliation. We do not take adverse action against employees for sharing or reporting genuine concerns and issues in good faith.

Making a report in good faith means you promptly come forward with the relevant information you have, and you believe you are giving a complete and accurate report. Anyone found to have taken part in retaliatory acts against someone who has reported genuine concerns in good faith is subject to disciplinary actions, up to and including discharge from the company.

Consequences for Misconduct

We are all expected to abide by Our Values and do the right thing. Violations of our Standards of Business Conduct, policies, procedures, operating practices, laws or regulations may result in disciplinary action, up to and including discharge from the company. Always remember, our commitment to shared success includes speaking up if you see misconduct.



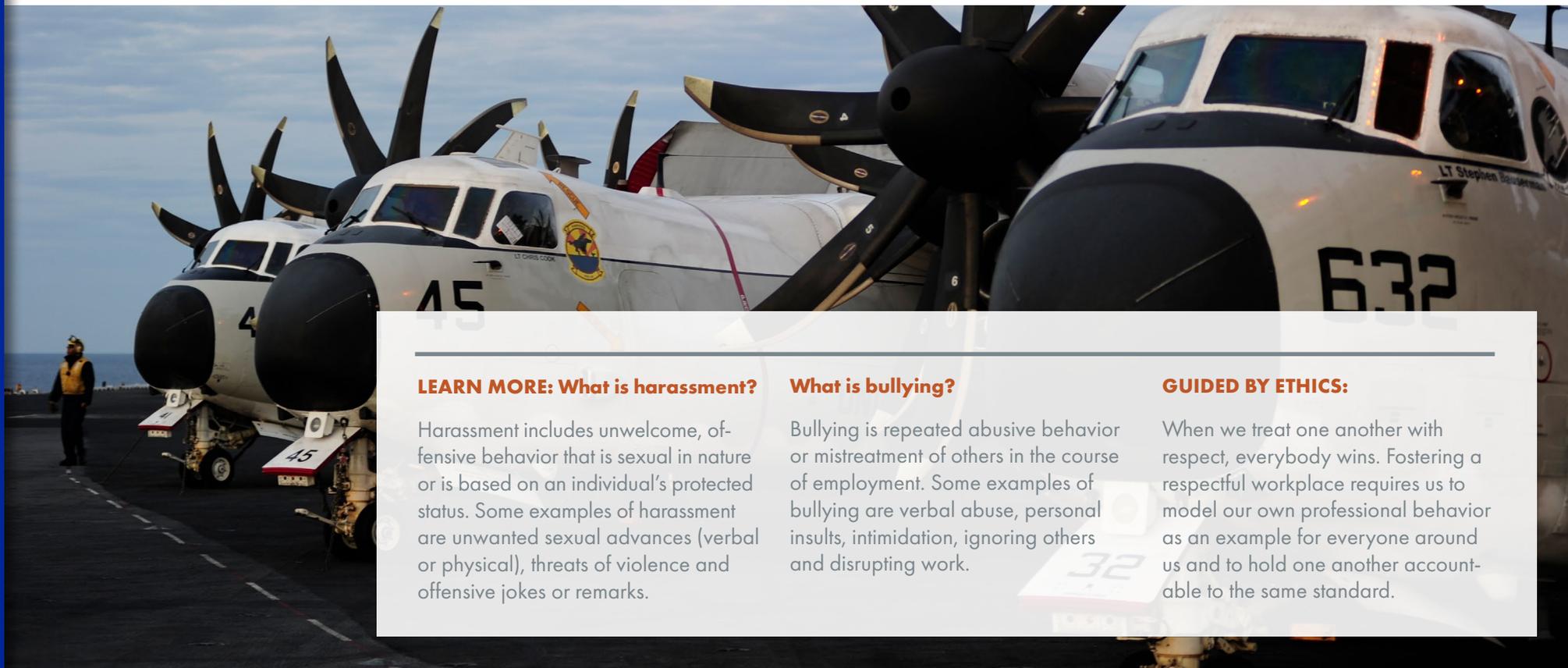
We Do the Right Thing

We Create a Respectful Work Environment

We are committed to providing a work environment where every person is treated with respect and dignity. We strive to foster a culture of belonging, reflective of Our Values and consistent with company policies, procedures and manuals and applicable federal, state and local laws and regulations.

WHAT THIS MEANS FOR YOU...

- Treat one another kindly and respectfully.
- Understand that harassment and bullying are contrary to Our Values and are not permitted.
- Know how to recognize inappropriate behavior and report it when you see it.



LEARN MORE: What is harassment?

Harassment includes unwelcome, offensive behavior that is sexual in nature or is based on an individual's protected status. Some examples of harassment are unwanted sexual advances (verbal or physical), threats of violence and offensive jokes or remarks.

What is bullying?

Bullying is repeated abusive behavior or mistreatment of others in the course of employment. Some examples of bullying are verbal abuse, personal insults, intimidation, ignoring others and disrupting work.

GUIDED BY ETHICS:

When we treat one another with respect, everybody wins. Fostering a respectful workplace requires us to model our own professional behavior as an example for everyone around us and to hold one another accountable to the same standard.

We Are Committed to Inclusion and Belonging

At Northrop Grumman, we are committed to maintaining a culture that values diverse perspectives and inclusion, and provides our employees a sense of belonging to enable success. We strive to attract, develop and engage an inclusive workforce.

As part of this commitment, we do not tolerate discrimination on the basis of race, ethnicity, color, national origin, ancestry, sex, gender, gender identity or expression, sexual orientation, marital or parental status, pregnancy or childbirth or related conditions, religion, creed, age, disability, genetic information, military service, veteran status or any other protected status.

WHAT THIS MEANS FOR YOU...

- Make hiring and employee management decisions based on an individual's qualifications, experience and past performance.
- Foster a workplace that encourages the sharing and appreciation of different perspectives, viewpoints and backgrounds.
- Act inclusively towards one another and do not improperly exclude others from normal workplace interactions or conversations.
- Ensure our employees can enjoy a sense of belonging that enables them to contribute at the highest levels.



LEARN MORE: Accommodation and Accessibility

Northrop Grumman is committed to working with and providing reasonable workplace accommodations, including, but not limited to, accessibility requests due to a disability, childbirth, pregnancy or related condition, religious beliefs or LGBTQIA+/transition assistance. We strive for our facilities, websites, information, communications and technology to be accessible to their users.

GUIDED BY ETHICS:

By seeking top talent across a broad spectrum, we aim to employ the best people to help us reach our goals. Thereby, we also foster an environment of collaboration and innovation where each team member can do their best work and achieve personal and professional growth.

We Protect the Privacy of Others

As part of our business, our company often needs to collect personal information (PI) about employees, contractors, suppliers, customers or other individuals with whom we work. It is critical that we safeguard PI and respect the privacy of individuals. Northrop Grumman complies with the many global privacy laws that impose obligations on the handling of PI and cross-border transfer of PI.

WHAT THIS MEANS FOR YOU...

- Understand the privacy laws that apply to your work and comply with all applicable laws when using PI.
- Be aware of, and comply with, all applicable legal and contractual obligations governing our use of PI as well as applicable company policies and procedures relating to the handling of PI throughout its life cycle.
- Collect and use PI only for legitimate Northrop Grumman business purposes and to the extent necessary to accomplish the business purpose. For example, avoid collecting or using government identification numbers if not necessary.
- Immediately report any suspected loss of PI or breach involving PI.
- Verify that any third party has a business need and is contractually obligated to safeguard information before allowing them access to PI.
- Consult with the Northrop Grumman Privacy Office to understand what specific requirements may apply, particularly when using or accessing PI from outside the country in which you are based.



LEARN MORE: What qualifies as Personal Information (PI)?

PI generally refers to information in any format that identifies, relates to or is capable of being associated with a particular individual. We take particular care in safeguarding sensitive personal information, information that relates to an individual's health or medical condition, or information related to an individual's performance. Examples of PI include:

- Compensation and work history
- Government issued identification numbers
- Birthdates
- Ethnicity

GUIDED BY ETHICS:

Safeguarding PI is crucial to building and sustaining trust with one another and our stakeholders. Although some specific rules about handling PI may not be part of everyone's daily job, we are all responsible for understanding the importance of protecting it.

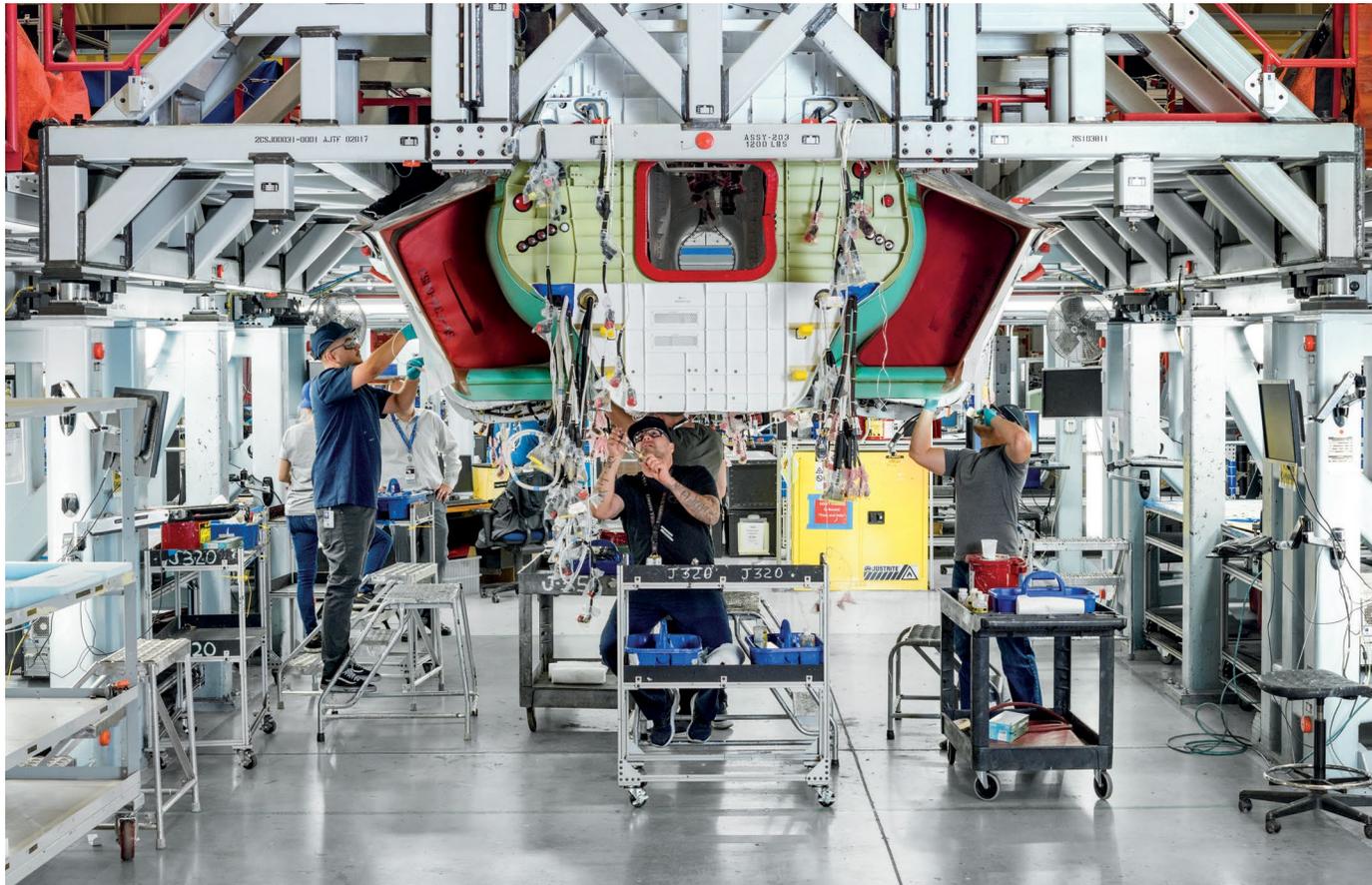
We Do What We Promise

We are Proud of the Quality of Our Products and Services

Our reputation hinges on our ability to consistently produce quality results.

WHAT THIS MEANS FOR YOU...

- Understand what is required of us in our daily work and strive to do it right the first time.
- Follow processes and speak up if you see issues or have concerns.



LEARN MORE: Quality Results

Never take short cuts. Taking shortcuts because of cost or schedule pressures never pays off in the end and can have significant consequences for us as individuals, for our company and for our customers.

Always strive for improvement. Each of us should look for ways to do our job better and more efficiently. Speak up if you see a better way to do your work. Understand how your work is being measured and use those measures to drive improvement. Seek to learn from what others doing similar work have done.

Earn trust and drive performance. If we focus on first-time quality, we earn the trust of our colleagues and our customers. Consistent focus and detailed attention to doing the right thing improve our performance as a company.

GUIDED BY ETHICS:

What we do as a company is important for the safety and security of the customers and people we serve. Our customers (and the lives of those who use our products) depend on us "getting it right." That means doing what we say we're going to do and delivering the results our customers require.

We Protect Information and Intellectual Property

Northrop Grumman's intellectual property (IP) and proprietary information are company assets that we must protect. Doing so is crucial to our continued success.

WHAT THIS MEANS FOR YOU...

- Promptly report all inventions you create following your Sector's invention reporting process.
- Maintain the confidentiality of proprietary information entrusted to us by the company or our customers, suppliers and collaborators.
- Be careful not to compromise or disclose proprietary information unless authorized or you are informed that it is legally required to do so. To honor our commitment to information security, we do not share proprietary or other confidential information with anyone — even within our company — unless there is a business need to do so. Ask for help if you are unsure what to do.
- Do not seek or use any information to which we are not entitled. Promptly report (and do not distribute) any information you believe you may have mistakenly received from customers or others that may be protected.
- Anyone leaving the company must return all proprietary information in their possession. The responsibility to protect IP and proprietary information continues beyond one's time at the company.
- Comply with copyright restrictions, which prohibit us from copying or distributing text, illustrations and original expressions, unless we have specific permission from the owner.

LEARN MORE: What is included within our IP?

Our IP includes technical data, software, processes, trade secrets, know-how, inventions, patents, trademarks and copyrighted materials. Northrop Grumman's inventions include those that we create in the course of our work that relates to the current or potential business or operations of our company. This is true whether developed on or off company premises, individually or jointly with others, or during or after working hours.

What is considered Proprietary Information?

Proprietary information is information that the company wishes to keep confidential and protect against unauthorized use or disclosure. It includes nonpublic financial reports, business strategies, pricing information, technical information, trade secrets, employee records and contracts, privileged information, and attorney work product.

GUIDED BY ETHICS:

Intellectual property rights allow people and companies to protect the economic value of their creations. In addition to protecting the company's IP, we also need to protect and respect IP that belongs to others.



We Safeguard Company Resources

In addition to our proprietary information and IP, our company provides us with other resources — like materials, equipment, facilities, information and services—to help us perform our jobs.

We share a responsibility to keep these assets safe from damage, theft, waste and misuse.

WHAT THIS MEANS FOR YOU...

- Use company resources for their intended business purpose. If you do make personal use of a company asset, make sure that it is limited, legal and in line with Our Values, Standards of Business Conduct and policies.
- Protect all resources provided to us by our customers, subcontractors and suppliers, just like we would protect our own.
- Familiarize yourself and comply with the relevant company procedures that outline employee responsibilities for protecting our data and information.

LEARN MORE: Insider Threat

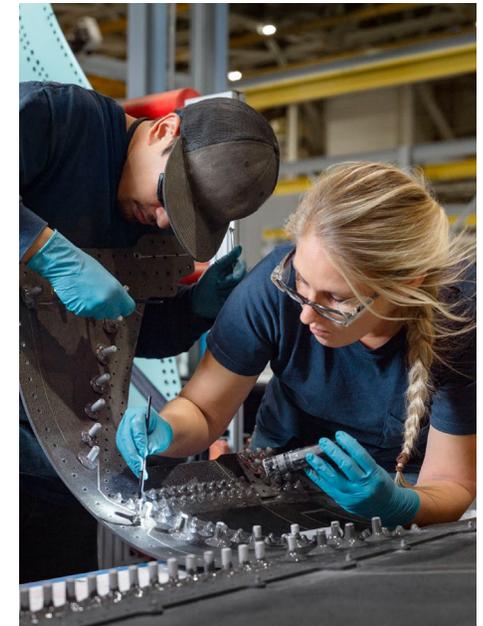
Northrop Grumman employees are our best line of defense in protecting company and customer data. Protecting company, third party and customer data is everyone's responsibility, and our success depends on it.

Here are some things you can do to keep our data secure.

- Know what's permitted and ask your manager when in doubt.
- Know that any work you do or create at Northrop Grumman belongs to the company. Do not send company or customer information to your personal email account, store it on personal electronic devices or a personal cloud account, or use a personal computer to print work material for any reason. Keep in mind that if you have a critical business need to print it at home, you must contact the IT Service Desk. They can assist you with how to properly connect a company laptop to your personal printer.

GUIDED BY ETHICS:

When we use our company's assets responsibly, we move our company and our purpose forward. Carelessness, waste and theft put our company's success at risk, and we all play a role in making sure that our company assets are being used for their intended purposes.



We Use Company Technologies and Social Media Responsibly

We are all responsible for communicating about Northrop Grumman legally, ethically and responsibly. This includes our use of networks, computer systems, mobile devices and channels like social media. While Northrop Grumman does not intend to limit our use of social media outside of work and company resources, it is important that we each use our best judgment while online.

WHAT THIS MEANS FOR YOU...

- When using company resources, do not access the internet for unauthorized, illegal or unethical purposes, or to view or download any offensive or sexually explicit material.
- Exercise the same care when drafting emails, IMs or other electronic messages as you would when drafting a more formal correspondence.
- Do not put something in writing if you would regret seeing it in the media.
- Be aware that the company may monitor, access, consider and disclose your use of any company assets, including company technologies. You should have no expectation of privacy relating to the use of company assets, consistent with applicable laws.
- Keep in mind that only authorized individuals may speak on our company's behalf, including online through social media channels.



LEARN MORE: Social Media

When using social media, keep the following guidelines top of mind:

- Be sensitive to security concerns, for ourselves and others.
- Do not use or disclose any proprietary or confidential information (about our company or about any customer or business partner).
- Refrain from attributing your personal opinions to our company.
- Avoid conduct on social media that is racist, sexist or otherwise discriminatory; is bullying or hateful; contributes to an atmosphere of a hostile work environment; threatens, supports, or incites violence or other malicious, abusive or criminal misconduct; or otherwise could harm our culture or our company.

GUIDED BY ETHICS:

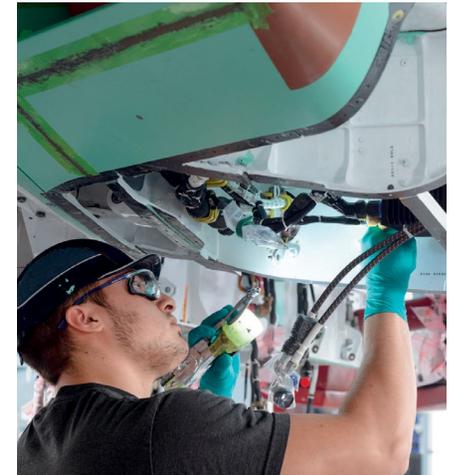
Our employees, customers and business partners make important decisions based on the reputation of our company. They trust us to communicate consistently, truthfully, respectfully and transparently. We all have a shared responsibility to enhance and protect the reputation of our company.

We Maintain Accurate Records

Our stakeholders rely on us to give them an accurate picture of our operations so that they can make sound decisions. That means we have a responsibility to maintain accurate corporate records, provide reliable information and comply with the law. It also means we need to maintain and deliver accurate cost data.

WHAT THIS MEANS FOR YOU...

- Understand that records aren't just financial in nature — they include physical or electronic documents we create as part of our jobs.
- Provide forthright and accurate information in all our records and communications.
- Accurately charge our labor on a timely basis and in accordance with the relevant policies and procedures.
- Never misrepresent, falsify or alter data.



LEARN MORE: Accurate Charging

Remember this:

- Contract costs must be authorized and charged to the proper contract charge number.
- Indirect costs must be properly classified according to the nature of the activity.
- Our U.S. government contracts prohibit us from charging the U.S. government for certain costs, either directly or indirectly. These "unallowable" costs must be recorded to a special charge number established for the unallowable cost. Seek guidance if you are unsure how to charge time or costs.

To maintain our integrity and transparency, we must avoid any potential mischarging, such as the following:

- Charging to a contract other than the one for which we performed work
- Failing to charge to an unallowable charge number when an activity was unallowable
- Charging direct activity to an indirect network or indirect activity directly to a contract
- Charging activity on a fixed price work scope to a cost-reimbursable work scope
- Charging for time not worked

Cost or Pricing Data

We have a responsibility to submit accurate and complete cost or pricing data when negotiating certain contracts or other business transactions related to government procurement.

Cost or pricing data can include all the facts that prudent buyers and sellers would reasonably expect to significantly affect price negotiations. This can include, but is not limited to, the following:

- Vendor quotations
- Nonrecurring costs
- Information on changes in production methods and in production or purchasing volume
- Data supporting projections of business prospects, objectives and related operational costs

- Unit-cost trends such as those associated with labor efficiency
- Make-or-buy decisions
- Information on management decisions that could have a significant bearing on costs

GUIDED BY ETHICS:

Our customers expect not only product excellence, but also that we adhere to the highest standards in our business practices and accuracy in our records.

We Comply with Competition and Antitrust Laws

We compete in the marketplace based on our reputation, competitive pricing, and the superior quality of our goods and services. Active and robust competition is beneficial to our industry, our company and our customers. It is important that we have a basic understanding of competition laws (known as antitrust laws in the U.S.) and comply with them in all that we do.

In general, these laws promote open competition and prohibit us from entering formal or informal agreements that improperly restrain trade and harm customers by having the potential to raise prices or reduce quality, innovation or purchase options. The competition laws also prohibit companies from doing things on their own that would unfairly exclude competitors from the market.

WHAT THIS MEANS FOR YOU...

- Do not share or discuss, even informally, information that is “Competitively Sensitive” (see more information below on what constitutes Competitively Sensitive information) with competitors, such as prices, terms of sale, business plans, bids or discounts to the extent such information is Competitively Sensitive.
- If you believe others may have improperly shared with you, name your concerns immediately with your manager or the Law Department.
- Avoid even the appearance of an agreement with a competitor to restrain trade, as doing so could negatively impact you and our company.
- When attending industry and trade association events, exercise caution where the possibility or the appearance of anti-competitive conversations is particularly high.

LEARN MORE: What is Competitively Sensitive information?

Competitively Sensitive information is, in general terms, nonpublic information that, if shared among competitors, could reasonably affect their competitive decision-making.

For example, nonpublic information is typically Competitively Sensitive if sharing it could allow the recipient to predict or know a competitor’s pricing or output, influence the recipient’s competitive decision-making (e.g.,

a decision to bid on a program, what terms to use in a bid for a program or what pricing to use in a bid), facilitate collusion or coordination, or otherwise cause competitors to compete less vigorously in the marketplace.

Examples of Competitively Sensitive information can include the following categories of information. Note that the information must be nonpublic and pertain to products or services where Northrop Grumman and the competitor compete or are likely to compete in the future.

- Pricing or any pricing related terms (including bid amounts and terms, discounts, commissions, rebates, and current or future profit margins)
- Capacity, output or production capability
- Customer lists
- Supplier or subcontractor terms
- Prospective plans to bid or not to bid on specific programs or opportunities
- Product road maps
- R&D programs
- Granular information on customers or product performance (e.g., revenues for specific products or customers)
- Wages, salaries and employee benefits (note that under antitrust law, companies can compete for employees even if they do not compete in the products or services they offer customers)

If you have any questions about whether information is Competitively Sensitive, please confer with the Law Department for assistance.

Further information on what complying with Competition and Antitrust Laws means to you:

- When interacting with competitors or potential competitors, we should not discuss the following topics:
- Prices and fixing prices (agreeing on any aspect of price or price-related terms to be applied to third parties, such as discounts, rebates, pricing formulas, charges, published prices or credit terms)
- Rigging bids (agreeing to influence an otherwise competitive bidding process — for example, agreeing to refrain from bidding or designating who will win a bid in advance and/or awarding “loser’s fees,” subcontracts or future winning bids)

- Dividing or allocating markets, territories, opportunities or customers
- Refusing to deal with suppliers or customers
- Specific employee compensation or benefits

We should consult the Law Department for specific guidance in connection with discussions with other companies on the following topics:

- Teaming and other collaborations
- Marketing plans
- Exclusivity provisions in agreements
- Agreements not to hire or solicit employees from another company

- Agreements not to compete in some way (e.g., non-competition provisions)

GUIDED BY ETHICS:

In most places we do business, it is unlawful to invite competitors to engage in anti-competitive activities, even if no further steps are taken and no economic harm results.

We Gather Competitive Information Fairly

To compete effectively, it is reasonable to learn about what our competitors may be doing. This knowledge can help shape our own business strategies, allowing us to serve our customers better and make better long-term decisions. We use publicly available sources to gather competitive information, such as news reports, trade publications and competitor promotional materials.

WHAT THIS MEANS FOR YOU...

Never misrepresent our identity or resort to other unethical means to gather competitive information.

LEARN MORE:

One method of competitive information-gathering includes consulting current Northrop Grumman employees.

What You Can Do:

You can ask current employees to share information or their views on an opportunity if their source is publicly available information or was learned in a permissible manner while they worked at Northrop Grumman (e.g., the information is not subject to a confidentiality agreement or other confidentiality restriction, the information was learned from publicly available sources).

Contact the Law Department for help whenever you have questions about what is or is not appropriate.

What You Can't Do:

You cannot ask current employees to share competitively sensitive or proprietary information from, or regarding, a former employer.

You cannot ask current employees to answer any questions if it is reasonably likely that the employee would need to share competitively sensitive or proprietary information from, or about, a former employer.

You cannot ask current employees to share information related to an opportunity if they are prohibited from working on that opportunity at Northrop Grumman.

GUIDED BY ETHICS:

It's possible that we may come across confidential information about a competitor, whether it is provided to us intentionally or by accident. If this happens, we know not to use or share the information. Instead, report it to one of your ethics resources as soon as possible.

It is important to remember that the burden is on the employees conducting information gathering to verify collection is in compliance with our company's legal and ethical obligations.



We Maintain Procurement Integrity

In accordance with Our Values, Northrop Grumman is committed to open, fair and transparent procurement processes. As a business, we expect an even playing field when we bid for contracts and other business. The integrity of our procurement and acquisition process, and those of our customers, are of critical importance to Northrop Grumman.

Integrity in the procurement and acquisition process requires vigilance and adherence to all relevant procurement and acquisition polices, regulations and laws. Part of that vigilance requires us to stay mindful to the flow of information and data in the procurement process so that we do not, even inadvertently, have access to the confidential or proprietary information of competitors, or the nonpublic information of our customers. Additionally, we need to carefully manage any contacts or discussions with government personnel and/or competitors so that we are not receiving inappropriate information (proprietary information/competitively sensitive information/source selection information). This includes any discussions with current or former government employees concerning potential employment with Northrop Grumman.

WHAT THIS MEANS FOR YOU...

Engaging with Current or Former Government Employees concerning potential employment with Northrop Grumman:

Certain laws govern the kinds of pre-employment discussions and employment contacts we can have with others and the activities in which former government employees can participate. That is why we must be particularly careful about engaging in discussions of hiring current or former government employees to come to work for Northrop Grumman. This is true whether we are having such discussions directly with the government employee or with others on their behalf.

If you are involved in the possible hiring or compensation of a current or former government employee, or if you are approached by a current or former government employee regarding employment, follow the policies and procedures in place to ensure compliance with applicable laws and Our Values, and seek guidance from the Law Department.

Access to another company's proprietary information, competitively sensitive information, or customer source selection data:

- If you become aware of another company's proprietary information that you do not believe you have permission to access (through non-disclosure agreements or proprietary information exchange agreements), or information that may be competitively sensitive, you may not use, release, distribute, copy, disclose or discuss the information without first receiving permission from a manager and the Law Department. This may include information about any of our competitors, current or prospective customers (including U.S. and non-U.S. governments) and previous employers.
- If you accidentally receive proprietary information belonging to another entity (not Northrop Grumman) for which you do not believe you have permission, do not read, release, share, disclose or forward the information. Instead, secure the information and notify the Law Department or the Ethics Office immediately.
- If you become aware of any nonpublic source selection information, customer proprietary information, or a competitor contractor's bid or proposal information, relative to an acquisition or competition, that you do not believe you have permission to access, do not read, share or forward the information. Instead, secure the information and notify the Law Department or the Ethics Office immediately.

LEARN MORE: Source Selection and Bid Information

Source selection information may include information not previously made available to the public that is prepared for use by an agency in evaluating a bid or proposal. It generally includes the following:

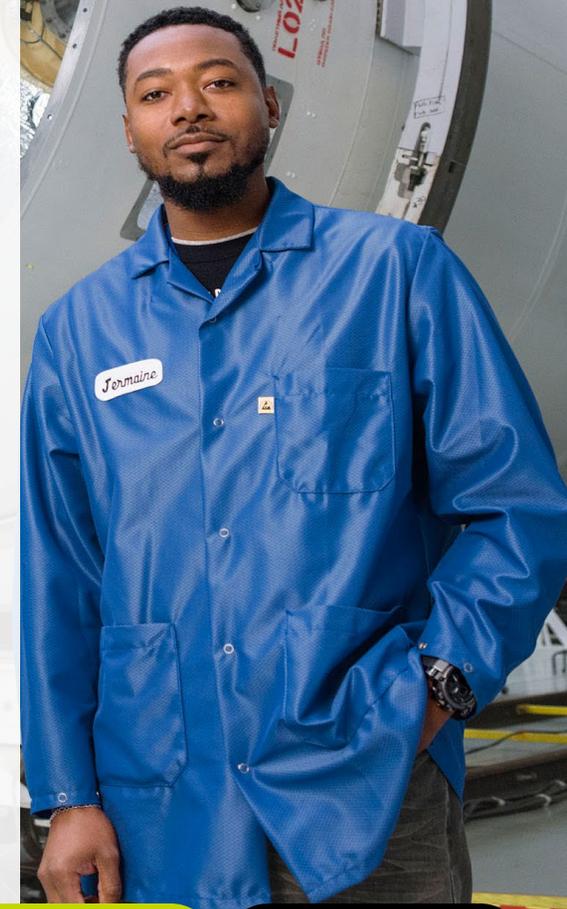
- Bid prices for sealed bids, lists or prices
- Source Selection plans
- Proposal evaluation plans
- Proposal evaluations of competing proposals
- Competitive range determinations
- Rankings of bids, proposals or competitors
- Cost or price evaluations
- Source Selection Board reports and evaluations
- Source Selection Advisory Board recommendations
- Proposed costs or prices submitted
- Any other information marked as "Source Selection Information"

Contractor bid or proposal information is generally proprietary information that must also be protected from improper disclosure. That typically includes categories of nonpublic information submitted to a government agency in connection with a bid or proposal, such as the following:

- Cost or pricing data to include indirect costs and direct labor rates
- Information about manufacturing processes, operations and techniques when marked "proprietary" or "Source Selection Information" in accordance with law or regulation
- Information marked as "contractor bid or proposal information"
- Other material or information related to a specific procurement that a bidding company deems proprietary

GUIDED BY ETHICS:

Northrop Grumman relies on honest and ethical practices in our procurement and acquisition processes and those processes utilized by our customers. Ensuring trust in these processes requires everyone in Northrop Grumman to act with ethics, integrity and transparency, and to treat our customers, competitors, peers and employees with respect. The integrity of our procurement and acquisition process is of critical importance to Northrop Grumman.



We Do Trade Controls the Right Way

We are a global company, with operations, suppliers and customers around the world. Our global reach means we must understand and comply with all applicable international trade laws, regulations, and trade sanctions or embargoes. It is especially important that we understand that exports and imports can occur domestically or abroad, may be subject to multiple sets of international trade laws and sanctions (both from the originating and receiving country) and may require authorization. Similarly, we must be aware of, and comply with, the various trade sanctions and embargoes imposed in the countries in which we operate.

WHAT THIS MEANS FOR YOU...

Consider whether business activities, including communications, involve the export of data or services, or the import of hardware to or from any country. If so, an authorization may be required for the activity.

It is also important to properly identify all parties to an export or import transaction.

Assess whether trade sanctions and/or embargoes restrict or prohibit our business dealings with identified countries or parties.

Be on the lookout for potentially illegal boycott requests that may be included in oral or written requests and may be received in any form. If any are discovered, then report immediately to the Law Department's Global Compliance Program. Refrain from taking any action until the Law Department provides written approval or guidance.

LEARN MORE: International Trade Compliance

What are tangible exports and imports?

Tangible exports and imports include the physical delivery of hardware, software or data — often via post, cargo carrier, express carrier or hand-carries. A tangible export is also an import into the receiving country, and compliance is required with the receiving country's laws and regulations, including declaration of the goods to the respective customs authority.

What are intangible exports and imports?

In addition, most jurisdictions control intangible exports of controlled data, including via communications, as in the following:

- Email or IM/chat
- Oral discussions (regardless of location or mode)
- File transfers
- Presentations and briefings
- Accessing or posting to shared drives and folders

If an export or import authorization is required, it will generally be transaction-based and have a limited scope and duration. Further, only the specified parties and countries identified in the authorization may receive exported goods or services. Finally, failure to obtain, properly use or make an accurate declaration to relevant Customs authorities may result in monetary penalties, damage to our company's reputation, and a loss of export or import privileges.

LEARN MORE: Boycotts

Some countries restrict, prohibit or boycott trade relations with other countries as part of their foreign policy, including imposing restrictive trade practices or boycotts that are not sanctioned by the U.S. Under U.S. anti-boycott laws, the following activities may be prohibited and/or penalized:

- Refusing or agreeing to refuse to do business with a boycotted country or its nationals
- Refusing or agreeing to refuse to do business with a blacklisted or boycotted company
- Certifying that an entity is not blacklisted
- Agreeing to participate in or otherwise cooperate with an unsanctioned international boycott
- Providing or agreeing to provide certain information on a company's activities with a boycotted country or with a blacklisted company or concerning the race, religion, gender or national origin of personnel
- Implementing letters of credit containing boycott terms or conditions
- Taking action with the intent to evade U.S. anti-boycott laws

U.S. anti-boycott laws may also require Northrop Grumman to promptly report requests we have received even if the boycott request is declined.



GUIDED BY ETHICS

We are all responsible for our company's compliance with international trade control laws and regulations. Employees are encouraged to seek guidance from supervisors, Sector International Trade Compliance offices, Global Trade Management, Global Import Management or a member of the Law Department whenever in doubt about their responsibilities under any international trade law, regulation or sanction/embargo.

Own It, Live It, Lead It

We Do The Right Thing

We Do What We Promise

We Commit to Shared Success

We Pioneer

Reporting Resources

We Commit to Shared Success

We Don't Offer, Make or Accept Bribes

At Northrop Grumman, we collaborate daily with government and commercial business partners around the globe regarding our operations. We must always conduct our business consistent with high ethical standards and in full compliance with applicable anti-corruption laws. We believe that a strong stance against bribery and corruption supports the values and culture of our company and is a critical enabler for us to achieve our business objectives. We maintain a zero-tolerance policy regarding bribery and improper business advantages that use unfair, unethical or illegal business practices.

WHAT THIS MEANS FOR YOU...

- Never offer, accept, promise, give or authorize any sort of bribe or kickback or provide other improper favors or things of value, directly or indirectly, in connection with our government or commercial business.
- Never offer facilitation payments.
- Keep in mind that employees involved in relationships with agents, sales representatives, consultants, resellers, venture or teaming partners, suppliers and other external trading partners can, under certain circumstances, be held liable for their actions and should exercise caution when selecting, vetting and overseeing those third-party relationships.
- Never request, direct, or knowingly allow a trading partner to do something for the company that we cannot ethically or legally do for ourselves.
- Understand and abide by the company's International Anti-Corruption Compliance policy and related procedures.
- If you are involved with international business on behalf of the company, stay current with anti-corruption training every 24 months.
- Be aware of potential corruption risk factors that can arise in your transactions and business relationships on behalf of the company (such as the perception of corruption in a particular country or customer organization, adverse information concerning the ethical reputation of trading partners, and other warning signs that might arise in the conduct of the company's business).
- Take appropriate measures to confirm that contracts, business and expense records with which you are involved accurately reflect the true nature and value of the transaction and the relationship of the parties involved and that accurate books and records are maintained.
- Promptly report potential or suspected policy or procedural violations, as well as unethical or illegal activity, to your manager, the Ethics Office or the Law Department.





LEARN MORE: Bribes and Facilitating Payments

What is a bribe?

A bribe can be anything of value — money, lavish meals, gifts, travel expenses, entertainment, offers of employment (including paid or unpaid internships), political donations or charitable contributions that may be seen as an attempt to obtain improper advantage for our company.

What is a facilitation payment?

Facilitation payments (sometimes referred to as “grease” payments) are generally small payments, usually made in cash, that are provided to a government official to speed up performance of a routine action that the official is already obligated to perform, like processing visas or permits. Only in the event of a threat to an employee’s life, health or safety may a “personal safety payment” be made to a government official and, in that case, the facts and circumstances surrounding that payment must be

reported to the Law Department as soon as practical and must be recorded accurately in the company’s books and records.

GUIDED BY ETHICS:

Anti-corruption compliance is the responsibility of all company employees. The consequences for the company and employees involved for violating anti-corruption laws can be severe. For example, anti-corruption enforcement actions can lead to civil and criminal enforcement actions; large fines and penalties; disgorgement of profits; damage to reputation and enterprise value (stock price); suspension or debarment from government contracting; loss of export privileges; costly investigations and external compliance monitors; as well as loss of employment and/or imprisonment for individuals. In summary, we must do the right thing, and there is no contract or business activity worth the risk and consequences of an anti-corruption violation.

We Avoid Conflicts of Interest

Doing business with integrity means making decisions that align with the best interests of our company, without prioritizing any personal benefits you stand to gain. A conflict of interest typically occurs when an individual's private interests interfere with the interests of our company. We avoid conflicts of interest and the appearance of conflicts of interest.

WHAT THIS MEANS FOR YOU...

- Watch out for and avoid any situation, on or off the job, that might compromise trust or cause others to doubt our integrity.
- Always be cautious and immediately speak with your manager, the Ethics Office or the Law Department if you have a question about whether a situation constitutes a conflict for you. (Members of our Board of Directors should speak with our General Counsel.)
- Immediately disclose actual or potential conflicts of interest on the Conflicts of Interest form C-196.

LEARN MORE:

While there are many types of possible conflicts, the following are some of the more common we may encounter.

Personal Investments

If our loyalty is divided between what's best for our company and another company, it could cause us to make decisions that would not be in Northrop Grumman's best interest.

Making significant personal investments, having a significant financial interest in businesses, or serving on an external board of directors for a company that competes with or does business with Northrop Grumman can create a conflict of interest.

Personal Relationships

When a family or close personal relationship exists between colleagues, especially if there is also a reporting relationship involved, it may create a conflict. Others may also perceive that preferential treatment or favoritism is being granted because of the relationship.

Managers may not have family members, relatives, or close personal relationships in their direct chain of command. In addition, action may be needed to resolve situations where there is a family member, relative or close personal relationship between employees in a matrix reporting structure or sphere of influence.

Dual Employment

Some outside employment or other opportunities might allow us to earn extra income or use our talent and experience without harming Northrop Grumman or our work in any way. Other opportunities that clearly compromise our company's business goals or our ability to perform our jobs at Northrop Grumman are not allowed.

To help us avoid conflicts in this area, we should not compete with the company, including performing outside work for business associates, unless we receive advance written approval. This includes starting a business or working for a secondary employer that is involved in a similar business area as Northrop Grumman or holding a position similar to your Northrop Grumman position.

In addition, avoid using Northrop Grumman time, facilities, resources, supplies or information for outside employment or other personal gain. You should always check with your manager (or the General Counsel if you are a member of the Board) before accepting an outside position. This will help ensure any outside work does not affect Northrop Grumman or your performance at the company.

GUIDED BY ETHICS:

Keep in mind that we all occupy a position of trust. Remember that avoiding even the appearance of a conflict can be just as important as avoiding an actual conflict. By avoiding actual conflicts or the appearance of a potential conflict of interest, we uphold our commitment to our company and our continued success.

We Demonstrate Good Judgment When Providing or Accepting Business Courtesies

Business courtesies such as business-related meals, travel expenses, and company logoed gifts are often provided in the business world to facilitate business meetings and to show respect and appreciation. However, different rules and approval requirements apply to offering or accepting business courtesies to/from U.S. Government Officials, Non-U.S. Government Officials and industry Business Associates.

When we compete in the marketplace, we do so on the basis of product quality, service, price and other similar factors. We never seek to gain or exert any improper advantage or influence, such as using business courtesies like gifts, meals or offers of entertainment. In fact, we must avoid even the perception of an improper advantage or influence, as it could negatively impact confidence in our company and our procurement process.

WHAT THIS MEANS FOR YOU...

- Exercise moderation in frequency and cost when offering and accepting business courtesies in the course of your work.
- Accurate recordkeeping is essential to help ensure that lines are not crossed which could create appearances of impropriety or outright illegal activity.
- Offer or accept business courtesies only if they do not impact our objectivity, will facilitate legitimate and necessary business activity, and are in line with our policies and the law.
- Understand and abide by the company's Business Courtesies procedure.

LEARN MORE:

A business courtesy is anything of value provided to, or by, a Government Official or industry Business Associate for which the donor is not reimbursed the fair market value by the recipient or his or her employer. A Business Courtesy may be a tangible or intangible benefit such as, but not limited to, the following:

- Meals
- Travel Expenses (airfare, lodging, ground transportation)
- Gifts
- Recreation

- Prizes
- Honoraria
- Discounts
- Loans
- Hospitality
- Forbearance
- Subscriptions
- Tickets to events
- Conference attendance fees
- Promotional items
- Use of a donor's time, materials, facilities or equipment.

All offered or accepted business courtesies must meet the following requirements:

- Ordinary and customary
- Infrequent and not lavish
- Not cash or cash equivalents (such as gift cards)
- Is offered or received without any expected or implied obligation or reciprocation, favor, or action in return
- Legal under applicable local laws and in line with the gift policies of the giver and the recipient
- Arises in the ordinary course of business
- Takes place in a setting that is appropriate in light of its business purposes

If you would like to give or accept a business courtesy that does not meet these general requirements, you must seek prior written approval. In addition, follow all business courtesy recordkeeping requirements set forth in our policy.

GUIDED BY ETHICS:

Remember that the business courtesies we offer and accept reflect upon us as a company. Sometimes, deciding whether to accept or offer a business courtesy is not straightforward. If you find yourself unsure, then seek guidance from your manager, the Ethics Office or the Law Department.

We Never Trade Based on Inside Information

Insider trading typically occurs when someone who has material nonpublic information about a company buys or sells that company's securities and has the opportunity to benefit from information they have that the market does not. Insider trading is unfair and illegal.

We must comply with laws prohibiting insider trading and understand that it is unlawful to buy or sell securities based on material nonpublic information. It is also against the law and company policy to share information or provide a "tip" to another person who may trade on that information.

WHAT THIS MEANS FOR YOU...

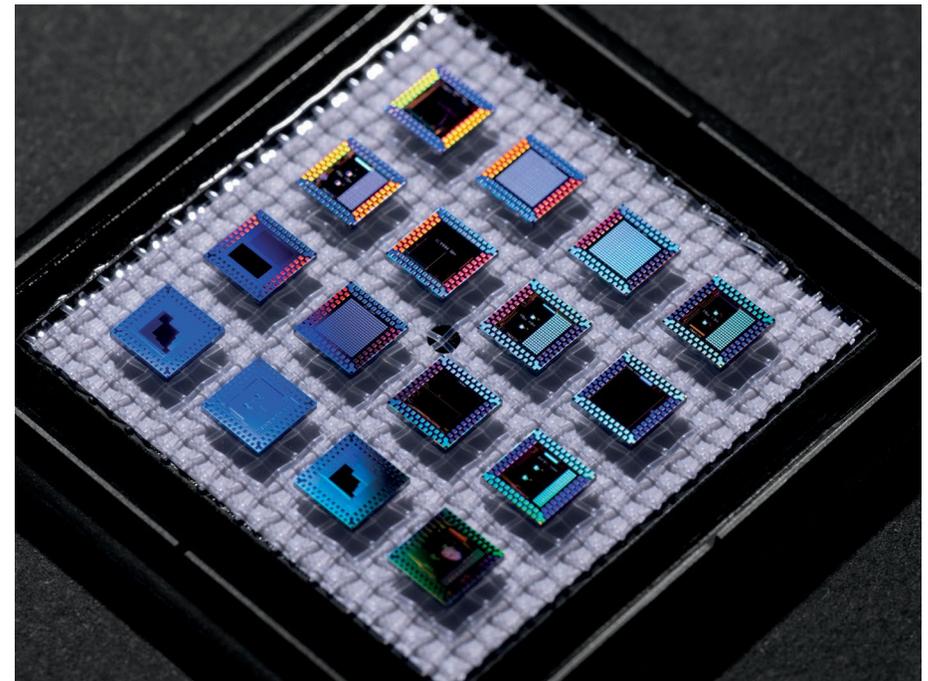
- Do not trade in Northrop Grumman stock or the stock of any publicly traded company if you have material nonpublic information about Northrop Grumman or that company.
- Do not share nonpublic information with family or friends, or even with colleagues who do not need to know the information to perform their job duties.

LEARN MORE: What is Material Nonpublic Information?

Material nonpublic information generally includes nonpublic information where there is a substantial likelihood that a reasonable investor would consider it important when deciding to buy, sell or hold a company's stock.

GUIDED BY ETHICS:

We may come in contact with material nonpublic information about our company or our customers, teammates, suppliers and others in the course of our work at Northrop Grumman. It is essential that we do not disclose that information and do not trade while in possession of material nonpublic information. If you are unsure whether information would be considered material nonpublic information, seek guidance from the Law Department.



We Are Good Corporate Citizens

Corporate citizenship at Northrop Grumman starts with people — the people we employ today and in the future, community members, customers and stakeholders. Together with our employees, we strive to improve the lives of people and make stronger communities possible. We work with dynamic partners to support the diverse needs of the communities in which we live and work through contributions from the company, the Northrop Grumman Foundation and our employees.

WHAT THIS MEANS FOR YOU...

- Be mindful of the way our operations affect the environment and the health of our global community.
- Volunteer in the community and participate in charitable activities that are consistent with our philanthropic strategy. (Keep in mind, these activities are considered voluntary and should be done in your personal time.)
- Avoid even the appearance that you are participating on behalf of the company or contributing company funds when personally engaging in political activities.

LEARN MORE: Environmental Sustainability

We are committed to reducing our environmental impacts, conserving natural and energy resources, as well as innovating practices that maintain the quality of the environment.

We use and expand our knowledge of program, product and supporting operations to identify opportunities to use energy, water and other resources more efficiently. We are committed to collaborating with key customers and suppliers to enhance sustainability within our industry and improve material efficiency and product design. We are committed to protecting biodiversity and ecosystems within our communities by using innovation to develop solutions to environmental problems.

Human Rights

Our policies, practices and procedures reflect a strong commitment to human rights. This commitment is grounded in Our Values. We do not, for example, use or condone the use of child or forced labor, indentured servitude, human trafficking, or other violations of human rights.

Responsible Charitable Contributions

Northrop Grumman believes in being a good corporate citizen and making stronger communities possible. Our philanthropic strategy focuses on giving to qualifying U.S.-based nonprofit organizations, international charitable organizations and accredited public school institutions. Contributions are allocated towards programs and partnerships that focus on STEM education,

military and veterans, health and human services, and the environment. We do not seek to provide funding or support to organizations that discriminate against others or take positions or actions contrary to Our Values.

Political Participation

Northrop Grumman carries out its civic responsibilities by taking an active part in political affairs when such participation is in full compliance with all applicable laws and serves the best interests of the company, shareholders and employees.

While Northrop Grumman typically does not participate in non-U.S. political activities, our company may choose to engage when it is traditional, customary and legal to do so.

GUIDED BY ETHICS:

Corporate responsibility is at the core of our company's culture and underlies our business and operating strategies.

We Value Health and Safety in the Workplace

We are committed to maintaining a safe workplace. This means we need to remain personally committed to performing our jobs safely and in a way that protects the health and safety of our colleagues, visitors and surrounding communities. It means that we maintain a workplace that is free from impairment by drugs or alcohol. It also means that violence and other dangerous, intimidating or aggressive conduct in the workplace are always off limits.

WHAT THIS MEANS FOR YOU...

- Understand and comply with legal requirements and company policies and procedures that relate to health and safety.
- Stop work immediately if you witness any work-related injuries, illnesses or hazardous conditions — like chemical spills or unsafe practices — and report the situation to your supervisor and/or local environmental, health and safety professionals.
- Never attempt to resolve workplace disputes or concerns with violence, threats or other aggressive or combative actions or behaviors including pushing, shoving, cornering, hitting and any other hostile or potentially dangerous physical or verbal acts.
- Never bring weapons into the workplace.

LEARN MORE: Drugs and Controlled Substances

A crucial part of maintaining safety at Northrop Grumman is our ability to make sound decisions. We cannot allow our decisions to be impaired by the use of alcohol, controlled substances or illegal drugs, which not only give rise to health and safety concerns but can also lead to performance and conduct issues. That is why Northrop Grumman prohibits the use of, impairment by, or unlawful manufacture, distribution, dispensation or possession of these substances on company properties or workplaces.

As a U.S. federal contractor, Northrop Grumman complies with the Drug Free Workplace Act and applicable local laws. Even though marijuana has been legalized in certain U.S. states, it remains illegal under federal law. Our company generally prohibits marijuana use, even in locations where it is not against state or non-U.S. law, and employees should not presume that state or non-U.S. laws protect their use of marijuana or cannabis-derived products or override Northrop Grumman's obligations as a U.S. federal contractor and cleared employer.

GUIDED BY ETHICS: Employee Resources and Assistance

Northrop Grumman recognizes the importance of increasing employees' total well-being and business performance through emotional, psychological and holistic life solutions. To support the emotional well-being of Northrop Grumman employees and their families, and to promote conversations, communications and education about mental health, our company offers an Employee Assistance Program (EAP) through NGCare.

The EAP serves employees and their family members by providing professional counseling and solutions for life in response to personal and professional challenges, ways to manage stress, build resilience, enhance relationships and more. Additionally, the Work-Life Solutions program offers consultation for eldercare, childcare, pet care, moving, home contractors and more. The NGCare benefit also includes legal and financial consultations. Services are confidential, and employees are automatically enrolled in the program. Family/household members are also eligible for support.

We Pioneer

Responsible Artificial Intelligence

At Northrop Grumman, we use Artificial Intelligence (AI) for faster, more powerful problem solving and effective decision making. AI is changing the way all of us work — from our internal business practices to the way our products and services perform to help our customers deliver their mission. And with this important change comes the expectation to develop and operate AI products and systems ethically and responsibly.

WHAT THIS MEANS FOR YOU...

If you work with AI:

- Make sure you understand and implement the customer's requirements to design and deploy responsible AI.
- Follow good software development practices with respect to identifying and testing information sources and data to mitigate any potentially unfair or improperly biased outcomes that may violate company policies and procedures related to privacy, discrimination or accessibility.
- Conduct regular checks of our AI systems and metrics to identify areas for improvement and to confirm they are operating as intended, in line with our company values and customer requirements.
- Use approved AI Systems. For those procuring or developing AI systems: Engage in the AI Governance process by registering AI Systems, regardless of risk level or scope, as soon as possible so that they are reviewed and approved by an AI Governing body.
- Observe Northrop Grumman's responsible AI principles: Human-Centered, Secure, Accountable, Robust, and Equitable when using or developing AI, and complete annual AI Training and any relevant AI system training.

GUIDED BY ETHICS:

Just as Northrop Grumman leads based on its reputation for high ethical standards, we must also adhere to Our Values and deliver Responsible AI. That means employees who develop, deliver and deploy AI at Northrop Grumman must be sensitive and aware that AI, like any technology, should be operated ethically and responsibly to gain the trust of stakeholders.



Reporting Resources

Our OpenLine Process

The Northrop Grumman OpenLine is a means to raise concerns or report a suspected violation of our Standards of Business Conduct, company policies or the law. As with other reporting channels, we can use the OpenLine properly without fear of retaliation.

The OpenLine, administered by a trusted vendor, is available 24 hours a day, seven days a week. At most international locations, the OpenLine is answered in the local language. You can call the OpenLine via a toll-free telephone number or access the OpenLine via the internet.

Regardless of which method you choose, reports to the OpenLine can be made anonymously if allowed by local laws. Keep in mind, however, it is easier for the company to conduct a thorough investigation and take remedial action when you provide your contact information for follow-up.

You can use the OpenLine to report suspected violations or potential wrongdoing, including issues relating to the following areas:

- Accounting Matters
- Conflicts of Interest
- Discrimination Policy Violation
- Employee Conduct
- Employment Practices
- Environmental, Health and Safety
- Export/Import Control
- Government Contracts, Non-Compliance and Regulations
- Harassment Policy Violation
- Human Trafficking
- Intellectual Property/Proprietary Information
- Kickbacks/Gifts/Gratuities/Bribery

- Misuse of Company Resources
- Procurement Integrity and Irregularities
- Quality/Manufacturing Concerns
- Retaliation Policy Violation
- Security
- Time Reporting/Mischarging/Overpayments

Some issue categories may not be available for employees in certain countries. If an allegation category is not available on the OpenLine, we encourage you to speak with your manager, Business Conduct Advisor (BCA), the Ethics Office or the Law Department concerning the suspected violation or potential wrongdoing.

When calling the OpenLine, you will speak with a specialist who will ask you a series of questions to better understand the nature of your concern. The specialist will then prepare a report which will be forwarded to the Compliance and Ethics Investigation Team or Employee Relations Center of Excellence for review, assignment and/or other action.

NORTHROP GRUMMAN OPENLINE REPORTING

For Phone and Web Reporting

<https://www.northropgrumman.com/corporate-responsibility/ethics-and-business-conduct/northrop-grumman-openline/>

ACCESS THE ETHICS AND BUSINESS CONDUCT WEBSITE

Global Intranet

<https://home.amer.myngc.com/ethics/Pages/home.aspx>

Retaliation is strictly prohibited against any person who reports a concern in good faith. If you believe that you were retaliated against, then report it to your manager, Human Resources, your BCA or the Law Department, or call the OpenLine.

In conjunction with Department of Defense (DoD) or National Aeronautics and Space Administration (NASA) contracts, 10 U.S.C. 2409 prohibits contractors from discharging, demoting or otherwise discriminating against an employee as a reprisal for disclosing information that the employee reasonably believes is evidence of gross mismanagement of a DoD or NASA contract, a gross waste of DoD or NASA funds, a substantial and specific danger to public health or safety, or a violation of law related to a DoD or NASA contract (including the competition for or negotiation of a contract), to any of the following entities:

- A Member of Congress or a representative of a committee of Congress
- The Inspector General
- The Government Accountability Office
- An employee of the DoD or NASA responsible for applicable contract oversight or management
- An authorized official of the Department of Justice or other law enforcement agency
- A court or grand jury
- A management official or other employee of the contractor or subcontractor who has the responsibility to investigate, discover or address misconduct. Any employee who believes that they have been discharged, demoted or otherwise discriminated against contrary to the prohibition set forth above may file a complaint with the DoD Inspector General.

Our Letter to the Audit Committee Process

As a public company based in the United States, Northrop Grumman is held to certain standards of integrity in our public disclosures and accounting practices, including those set forth by the Sarbanes-Oxley Act (SOX), as well as regulations by the U.S. Securities and Exchange Commission (SEC) and the New York Stock Exchange (NYSE).

Consistent with these requirements, employees are required to report any concerns about accounting, internal accounting control or auditing matters at Northrop Grumman.

In addition to the resources found in this code, you can report your concerns regarding company accounting practices, financial controls, financial reporting or the ethics of individuals responsible for financial controls of the company by writing directly to the following:

Chair, Audit and Risk Committee
 Northrop Grumman Board of Directors
 c/o Office of the Corporate Secretary
 2980 Fairview Park Drive
 Falls Church, VA 22042
 United States of America

Mail will be delivered to the chair of the Audit Committee. Keep in mind that any concerns dealing with issues other than finance, accounting or audit may be returned to the company for appropriate inquiry.