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| LAST NAME | FIRST NAME | M.I.    . |

**SECTION 1 – PERIOD(S) OF GOVERNMENT SERVICE** Begin with your current or most recent government service. Be sure to include temporary, part-time, or multiple service periods, whether or not compensated, for all civilian (federal) and military (regular, reserve and National Guard) service. Continue on last page below, if needed for additional entries.

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| GOVERNMENT AGENCY/BRANCH OF MILITARY SERVICE (MOST RECENT) | DATES (MM/YYYY)  FROM:       TO: | |
| TERMINAL/TRANSITION LEAVE DATE (if applicable) | SEPARATION DATE (MM/DD/YYYY) | |
| RANK/LEVEL/GRADE/STEP (Highest) | JOB TITLE | DOES YOUR ANNUAL SALARY/RATE OF BASIC PAY EXCEED $170,664.50?  Yes  No |
| STATUS  REGULAR  CIVILIAN  RESERVE  NATIONAL GUARD  SPECIAL GOV. EMPLOYEE | DUTIES (if not listed on resume) | |
| GOVERNMENT AGENCY/BRANCH OF MILITARY SERVICE (MOST RECENT) | DATES (MM/YYYY)  FROM:       TO: | |
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| STATUS  REGULAR  CIVILIAN  RESERVE  NATIONAL GUARD  SPECIAL GOV. EMPLOYEE | DUTIES (if not listed on resume) | |



Before responding to the questions below, you should consult with your current or former Designated Agency Ethics Official (DAEO), such as Judge Advocate General (JAG), if you have any questions about the applicability of the law to your situation. If you need additional information on terminology, please see the Instructions section at the end of the form. In responding to questions, all references to Northrop Grumman are intended to include Northrop Grumman Corporation, all entities with Northrop Grumman in their name, and all entities with Alliant Techsystems, ATK, or Orbital Sciences in their name, and other Northrop Grumman entities. <https://www.northropgrumman.com/AboutUs/OurHeritage/Pages/default.aspx>

**SECTION 2 – PROCUREMENT INTEGRITY LAW (41 U.S.C. § 2101, et seq.)**

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| A. As a government employee or representative, or as a contractor employee providing procurement support to the government, have you participated, or are you now participating, either directly or by supervising others, in any ongoing competitive procurement that has not yet been awarded? | Yes  No |
| IF YES, IDENTIFY THE PROCUREMENT AND ANY KNOWN INVOLVEMENT BY NORTHROP GRUMMAN | |
| B. Have you worked for the government within the last year? **IF NO, SKIP QUESTIONS C AND D BELOW AND PROCEED TO SECTION 3.** | Yes  No |
| C. Within the last year, did you have any of the following responsibilities in connection with a contract valued at over $10 million in which Northrop Grumman was involved? | |
| Program Manager or Deputy Program Manager (by title or function)? | Yes  No |
| Procuring Contracting Officer? | Yes  No |
| Administrative Contracting Officer? | Yes  No |
| Source Selection Authority? | Yes  No |
| Member of a Source Selection Evaluation Board? | Yes  No |
| Chief of a Financial or Technical Evaluation Team? | Yes  No |
| d. Within the last year, were you involved in making one of the following decisions? | |
| Awarding to Northrop Grumman a contract, subcontract, contract modification, subcontract modification, task order, or delivery order exceeding $10 million? | Yes  No |
| Establishing overhead or other rates applicable to one or more contracts with Northrop Grumman exceeding $10 million? | Yes  No |
| Approving issuance of payments exceeding $10 million to Northrop Grumman? | Yes  No |
| Paying or settling with Northrop Grumman a claim exceeding $10 million? | Yes  No |
| IF YOU ANSWERED “YES” TO ANY QUESTION IN C OR D ABOVE, PLEASE IDENTIFY AND DESCRIBE IN DETAIL YOUR POSITION AND YOUR INVOLVEMENT IN THE DECISION (I.E., IDENTIFY THE CONTRACT VEHICLE OR PROGRAM INVOLVED, THE NORTHROP GRUMMAN ENTITY INVOLVED, THE PRODUCTS OR SERVICES PROVIDED BY NORTHROP GRUMMAN UNDER THE CONTRACT, AND THE DATE YOUR INVOLVEMENT ENDED). PLEASE ALSO PROVIDE A COPY OF AN ETHICS OPINION LETTER FROM YOUR DAEO. | |

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**SECTION 3 – GENERAL CONFLICT OF INTEREST LAWS (18 U.S.C. § 207)**

In responding to questions in this section, you should use the definition of “Northrop Grumman” provided at the top of page 2. See the Instructions section at the end of the form with Definitions, for ***bolded italicized*** terms. Before responding to the questions below, you should consult with your applicable DAEO if you have any questions about the applicability of the law to your situation or the meaning of certain terms (e.g., “***official responsibility***,” “***senior employee***”). If you answer Yes to any question below, provide a copy of an ethics opinion letter from your DAEO.

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| **Lifetime Representation Ban (18 U.S.C. § 207(a)(1))**. At any time during the course of your government service, did you participate ***personally and substantially*** in a ***particular matter*** that involved Northrop Grumman or any of its subsidiaries? | Yes  No |
| **Two-Year Representation Ban (18 U.S.C. § 207(a)(2))**. During the one-year period prior to the termination of your government service, was there pending under your ***official responsibility*** a ***particular matter*** that involved any government contractor, including Northrop Grumman? | Yes  No |
| **One-Year Representation Ban (18 U.S.C. § 207(c))**. During the last year, have you served in a position as a "***senior employee***," as defined in the statute? | Yes  No |
| **Two-Year Representation Ban (18 U.S.C. § 207(d))**. During the last two years, have you served in a position as a "***very senior employee***," as defined in the statute? | Yes  No |
| **LEGISLATIVE RESTRICTIONS (18 U.S.C. § 207(e))**. During the last year, have you served in Congress or as an employee of the U.S. Congress? | Yes  No |
| **POLITICAL APPOINTEE**. Are you, or have you ever been, a political appointee under the current administration? | Yes  No |

**SECTION 4 – SECTION 847 OF THE NATIONAL DEFENSE AUTHORIZATION ACT FOR FISCAL YEAR 2008 (To be completed by current and former Department of Defense [DoD] employees only)**

Section 847 of the National Defense Authorization Act for Fiscal Year 2008 requires certain current or former DoD employees who leave DoD service on or after January 28, 2008 to obtain a written, tailored ethics opinion regarding the applicability of post-employment restrictions to the activities that the individual may undertake on behalf of a DoD contractor within two years after leaving DoD service. The covered DoD employees are those who either: (1) serve or have served as a program manager (PM), deputy PM, procuring contracting officer, administrative contracting officer, source selection authority, member of a source selection evaluation board, or chief of a financial or technical evaluation team for any contract exceeding $10 million; or (2) serve or have served in certain senior-level positions and participated or have participated ***personally and substantially*** in a DoD acquisition exceeding $10 million.

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| A. Are you a current or former DoD employee (civilian or military)? **IF NO, PROCEED TO THE ACKNOWLEDGEMENT SECTION AT THE BOTTOM OF PAGE 4.** | Yes  No |
| B. Did you separate from DoD before January 28, 2008? **IF YES, PROCEED TO THE ACKNOWLEDGEMENT SECTION AT THE BOTTOM OF PAGE 4.** | Yes  No |
| C. Have you ever served in, or acted in the capacity of, any of the following positions for a contract exceeding $10 million? If you answer “Yes” with respect to any of the positions below, you are covered by this law. Proceed to the Explanations section on page 4. | |
| Program Manager | Yes  No |
| Deputy Program Manager (by title or function) | Yes  No |
| Procuring Contracting Officer | Yes  No |
| Administrative Contracting Officer | Yes  No |
| Source Selection Authority | Yes  No |
| Member of a Source Selection Evaluation Board | Yes  No |
| Chief of a Financial or Technical Evaluation Team | Yes  No |

**SECTION 4 – SECTION 847 OF THE NATIONAL DEFENSE AUTHORIZATION ACT FOR FISCAL YEAR 2008 (To be completed by current and former Department of Defense [DoD] employees only) (cont’d)**

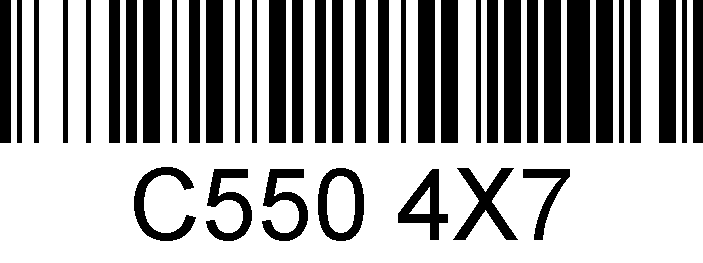
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| D1. Do you serve, or have you served, in one of the following senior position(s) covered by this law? If you respond “Yes” with respect to any of the positions below, proceed to D2. If you respond “No” with respect to all of the positions below, proceed to the Acknowledgement section below. | |
| General or flag officer position (O-7 and above) | Yes  No |
| Senior Executive Service (SES) position | Yes  No |
| Executive Schedule position | Yes  No |
| D2. Have you participated in any way in an acquisition exceeding $10 million in value? If you answer “Yes,” you are covered by this law. Proceed to the Explanations section below. | Yes  No |
| **One-Year LOBBYING activities ban (2018 ndaa § 1045)**. During the last year, have you served in the Department of Defense in a position as an O-7, O-8, or Civilian Equivalent (Tier 1 or 2 SES (career or non-career) and DISES, SL, ST, and DISL)? | Yes  No |
| **Two-Year lobbying activities Ban (2018 NDAA § 1045)**. During the last two years, have you served in the Department of Defense in a position of O-9, O-10, or Civilian Equivalent (Tier 3 (and above) SES (career and non-career) or DISES, or Presidential Appointees confirmed by the Senate)? | Yes  No |

**EXPLANATION --Please use the following page, if necessary, for completeness of your response.**

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| IF YOU ANSWERED THE QUESTIONS ABOVE IN SUCH A WAY AS TO INDICATE THAT YOU ARE COVERED BY THIS LAW, PLEASE PROVIDE A DETAILED STATEMENT DESCRIBING THOSE MATTERS THAT CAUSED YOU TO ANSWER SECTION 4, QUESTION C OR QUESTION D2 IN THE AFFIRMATIVE, INCLUDING THE NATURE, EXTENT, AND DATES OF YOUR INVOLVEMENT. YOU ARE REQUIRED UNDER THIS LAW TO REQUEST IN WRITING A COPY OF A TAILORED ETHICS OPINION LETTER FROM YOUR DAEO SPECIFICALLY ADDRESSING THE APPLICABILITY OF POST-EMPLOYMENT RESTRICTIONS TO ACTIVITIES THAT YOU MAY UNDERTAKE ON BEHALF OF NORTHROP GRUMMAN DURING THE TWO-YEAR PERIOD AFTER LEAVING DOD SERVICE. YOU MUST SUBMIT THE ETHICS OPINION LETTER TO NORTHROP GRUMMAN. |

**ACKNOWLEDGEMENT (PLEASE READ CAREFULLY BEFORE SIGNING)** In addition to the answers and information I have provided above that may reflect restrictions on my employment following my termination from government service, I understand that in prior jobs, whether in the government or in industry, I may have been exposed to proprietary, sensitive, and/or privileged information of the Government or of a competitor. Northrop Grumman’s policies strictly prohibit employees from using or sharing that information improperly within the Company. I acknowledge that, if I become employed by or provide services to Northrop Grumman, it is incumbent upon me to be alert to these restrictions and to avoid creating even the appearance that such information may have been used or disclosed. In particular, if I am asked to provide services in support of a capture or similar effort that could create an actual or apparent conflict of interest, I will discuss the matter with the Northrop Grumman Law Department before performing such services. I further agree that if I have any questions, I will seek guidance from the Northrop Grumman Law Department prior to any use or disclosure. I hereby certify that by entering my name, either by hand-written or electronic signature, the answers and information I have provided above are true, accurate, and complete to the best of my knowledge and belief. I also intend for this document, if utilized in electronic form, to have the same force and effect as if personally signed by me in writing.

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| --- | --- |
| SIGNATURE | DATE |

**EXPLANATIONS - CONTINUED - Please use this page, if necessary, for completeness of your response.**

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| IF YOU ANSWERED THE QUESTIONS ABOVE IN SUCH A WAY AS TO INDICATE THAT YOU ARE COVERED BY THIS LAW, PLEASE PROVIDE A DETAILED STATEMENT DESCRIBING THOSE MATTERS THAT CAUSED YOU TO ANSWER SECTION 4, QUESTION C OR QUESTION D2 IN THE AFFIRMATIVE, INCLUDING THE NATURE, EXTENT, AND DATES OF YOUR INVOLVEMENT. |

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**INSTRUCTIONS**

**Definitions:**

*The questions are written using specific terms, which are defined in the applicable government regulations and included, in part, below. If you have any questions regarding this terminology, please consult your designated agency ethics official (DAEO).*

To participate **"personally"** means directly, and includes participation of a subordinate if actually directed by you in the matter.

To participate **"substantially"** means that your involvement is either of significance to the matter, or forms a basis for a reasonable appearance of such significance. It requires more than official responsibility, knowledge, perfunctory involvement, or involvement on an administrative or peripheral issue. A finding of substantiality may be based not only on the effort devoted to a matter, but also on the importance of the effort. While a series of peripheral involvements may be insubstantial, the single act of approving may be substantial. In addition to approval, other acts may also be considered "substantial," such as participation in a critical step.

The term **"particular matter"** includes any investigation, application, request for a ruling or determination, rulemaking, contract, controversy, claim, charge, accusation, arrest, or judicial or other proceeding. General rule-making is usually excluded from the term "particular matter," since general rule-making seldom involves specific parties. Consequently, it is possible that an employee who participated in a rule-making while employed by the Government will, after leaving Government service, be able to appear before his former agency concerning the application of the rule to his new private sector employer without violating the lifetime restrictions. The term does not encompass any matter before the Government; only those matters that arise to particular matters. The provision further requires that an employee's official participation in a particular matter must have taken place at a time when the matter involved a non-Federal party (or parties) and also involve such a party or parties at the time of the proposed representation, although these can be different parties. Finally, the restriction remains for the lifetime of the particular matter. For example, when a contract is re-competed and awarded, the new contract is generally considered a new particular matter.

**"Official responsibility"** is defined as the direct administrative or operating authority, whether intermediate or final, and either exercisable alone or with others, to approve, disapprove, or otherwise direct Government action. Accordingly, a matter is under your "official responsibility" if you had the power, either directly or through a subordinate, to approve, disapprove, or otherwise direct a Government action. Those areas assigned by statute, regulation, executive order, or job description usually determine the scope of an employee's official responsibility. All particular matters under consideration in an agency are under the official responsibility of the agency head, and each is under that of any intermediate supervisor having responsibility for the activities of a subordinate employee who actually participates in the matter. A matter was **"actually pending"** under a former employee's official responsibility if the matter was in fact referred to or under consideration by persons within the employee's area of responsibility. It is important to note that unlike section 207(a)(1), this restriction is triggered simply by virtue of the fact that the particular matter was pending under your official responsibility and does not require that you personally and substantially participated in the matter.

**“Senior Employee”** An individual is defined a senior employee if he/she received total pay from Federal or non-Federal sources equal to or greater than 86.5 percent of the rate of basic pay for level II of the Executive Schedule (exclusive of any reimbursement for a non-Federal employer's share of benefits not paid to the employee as salary), and: **(i)** served in a Federal position ordinarily compensated at a rate equal to or greater than 86.5 percent of level II of the Executive Schedule, regardless of what portion of the pay is derived from Federal expenditures or expenditures by the individual's non-Federal employer; **(ii)** received a direct Federal payment, pursuant to [5 U.S.C. 3374(c)(1)](https://www.law.cornell.edu/uscode/text/5/3374#c_1), that supplemented the salary that he received from his/her non-Federal employer; or **(iii)** the non-Federal employer received Federal reimbursement equal to or greater than 86.5 percent of level II of the Executive Schedule.

**“Very Senior Employee”** A individual is defined as **very senior** employee if he/she is: (1) Employed in a position that is either listed in [5 U.S.C. 5312](https://www.law.cornell.edu/uscode/text/5/5312) or for which the rate of pay is equal to the rate of pay payable for level I of the Executive Schedule; (2) Employed in a position in the Executive Office of the President that is either listed in [5 U.S.C. 5313](https://www.law.cornell.edu/uscode/text/5/5313) or for which the rate of pay is equal to the rate of pay payable for level II of the Executive Schedule; (3) Appointed by the President to a position under [3 U.S.C. 105(a)(2)(A)](https://www.law.cornell.edu/uscode/text/3/105#a_2_A); or (4) Appointed by the Vice President to a position under [3 U.S.C. 106(a)(1)(A)](https://www.law.cornell.edu/uscode/text/3/106#a_1_A).



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