

## Human Rights Impact Assessment 2020 – Northrop Grumman Corporation

**Whereas:** Under the UN Guiding Principles on Business and Human Rights (UNGPs), companies have a responsibility to respect human rights within their operations and value chains. This responsibility entails that companies should assess, identify, prevent, mitigate, and remediate adverse human rights impacts and disclose how they address salient human rights issues.

Northrop Grumman is the world's third largest defense contractor, with the U.S. Government (USG) representing 82 percent of 2018 sales.<sup>1</sup> Business relationships with the USG and governments whose activities may be linked to human rights violations may expose Northrop Grumman to legal, financial, and reputational risks. It is essential to conduct human rights impact assessments to evaluate and mitigate associated human rights risks.

In 2018, Northrop Grumman was awarded a \$95 million USG contract to develop the Homeland Advanced Recognition Technology (HART) database, which is expected to hold biometric data for 260 million people.<sup>2</sup> This presents concerns regarding algorithmic racial bias, risks to privacy and First Amendment rights, and potential harm to immigrant communities. The UN Office of the High Commissioner for Human Rights expressed alarm regarding the potential use of lethal autonomous robotics for targeted killings by states, including Northrop Grumman's X-47B drone.<sup>3</sup>

Conflict-affected areas are characterized by widespread human rights abuses, and the UNGPs encourage business enterprises operating in those contexts to conduct enhanced due diligence to ensure that the business is not involved with such abuses.<sup>4</sup> Northrop Grumman has contracts with or supplies weapons to multiple states engaged in international and internal armed conflicts, including Saudi Arabia and United Arab Emirates (Yemen), India (Kashmir), Israel (Palestine), Morocco (Western Sahara), and Colombia.<sup>5</sup>

Northrop Grumman is one of Saudi Arabia's largest defense partners and has, "been heavily involved in the training and development of Saudi military personnel."<sup>6</sup> In 2018, the International Commission of Jurists reported that the Saudi-led coalition violated international humanitarian law during operations in Yemen in 2017.<sup>7</sup> The UN declared that the conflict created the world's worst humanitarian crisis, with 24 million people dependent on aid and protection.

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<sup>1</sup> [www.northropgrumman.com/AboutUs/AnnualReports/Documents/pdfs/2018\\_noc\\_ar.pdf](http://www.northropgrumman.com/AboutUs/AnnualReports/Documents/pdfs/2018_noc_ar.pdf)

<sup>2</sup> [www.documentcloud.org/documents/6542043-MSLS-Industry-Day-Presentation-FINAL.html](http://www.documentcloud.org/documents/6542043-MSLS-Industry-Day-Presentation-FINAL.html)

<sup>3</sup> [www.theatlantic.com/technology/archive/2014/05/the-military-wants-to-teach-robots-right-from-wrong/370855/](http://www.theatlantic.com/technology/archive/2014/05/the-military-wants-to-teach-robots-right-from-wrong/370855/)

<sup>4</sup> UNGP Principle 7; [www.amnesty.org/en/documents/act30/0893/2019/en/](http://www.amnesty.org/en/documents/act30/0893/2019/en/)

<sup>5</sup> [www.northropgrumman.com/AboutUs/OurGlobalPresence/Pages/default.aspx](http://www.northropgrumman.com/AboutUs/OurGlobalPresence/Pages/default.aspx); [www.upi.com/Defense-News/2015/10/16/Colombia-receives-Northrop-Grumman-ANTPS-78-radar/4871445000556/](http://www.upi.com/Defense-News/2015/10/16/Colombia-receives-Northrop-Grumman-ANTPS-78-radar/4871445000556/); [www.moroccoworldnews.com/2018/05/246179/morocco-cargo-m1a2s-laser-tanks-us/](http://www.moroccoworldnews.com/2018/05/246179/morocco-cargo-m1a2s-laser-tanks-us/); [www.news.northropgrumman.com/news/releases/northrop-grumman-delivers-center-fuselage-for-first-israeli-f-35-aircraft](http://www.news.northropgrumman.com/news/releases/northrop-grumman-delivers-center-fuselage-for-first-israeli-f-35-aircraft)

<sup>6</sup> [www.northropgrumman.com/AboutUs/OurGlobalPresence/MiddleEastAndAfrica/Pages/Who-We-Are-in-the-Middle-East.aspx](http://www.northropgrumman.com/AboutUs/OurGlobalPresence/MiddleEastAndAfrica/Pages/Who-We-Are-in-the-Middle-East.aspx)

<sup>7</sup> <http://www.icj.org/wp-content/uploads/2018/09/Yemen-War-impact-on-populations-Advocacy-Analysis-Brief-2018-ENG.pdf>

Northrop Grumman adopted a Human Rights Policy in 2013, but does not disclose its salient human rights issues or how the policy is implemented to prevent, mitigate, or remediate adverse human rights impacts associated with its government contracts. In 2019, 31% of shareholders voted in favor of increased reporting on the implementation of the company's Human Rights Policy.<sup>8</sup> Yet, investors are still unable to assess how it evaluates and mitigates risks accompanying specific activities such as weapons contracts, military training, biometrics, and emerging technologies, or with governments engaged in conflict.

**Resolved:** Shareholders request that Northrop Grumman publish a report, at reasonable cost and omitting proprietary information, with the results of human rights impact assessments examining the actual and potential human rights impacts associated with high-risk products and services, including those in conflict-affected areas.

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<sup>8</sup> <http://investor.northropgrumman.com/node/36321/html>