

Policy: Whistleblower

Policy No.: 1413

Responsible Officer: Senior VP, Human Resources

A whistleblower is an employee who reports an activity that he/she reasonably believes to be illegal. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities. If an employee has knowledge of or a concern of illegal activity, the employee should report it to his/her direct manager, to his or her ethics officer, or to the Ethics and Employee Advocate Help Line at 1.877.319.0270 or https://dayzim.ethix360.com. An employee, however, who intentionally files a false report of wrongdoing will be subject to appropriate disciplinary action.

The Company's whistleblower policy is interpreted consistently with its policies on Equal Employment Opportunity and Non-Discrimination and Harassment. An investigation into any reported incident of illegal activity will follow the procedures set forth in the Company's Equal Employment Opportunity and Non-Discrimination and Harassment policies. Any person found to have retaliated against an individual for reporting an alleged illegal activity or for participating in an investigation of allegations of such conduct will be subject to appropriate disciplinary action.

1.0 Whistleblower Protections for Contractor Employees

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

- A Member of Congress;
- A representative of a committee of Congress;
- An Inspector General that receives funding from or has oversight over contracts awarded for or on behalf of DoD;
- The Government Accountability Office;
- A DoD employee responsible for contract oversight or management; or
- An authorized official of an agency or the Department of Justice.

In addition to the procedures at FAR 3.904, any contractor employee who believes that he or she has been discharged, demoted, or otherwise discriminated against contrary to the policy in 203.903 may file a complaint with the DoD Inspector General.