



## Whistleblower Protection

Policy No.:1444

Effective: 10/25/2013

Sponsor: Human Resources

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### Overview

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

### Policy Statement

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://www.integrity-helpline.com/SOC.jsp>. 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.

### Whistleblower Protections for US Government Contractor Employees

The Whistleblower Protection Act (10 U.S.C. 2409) and the National Defense Authorization Act for Fiscal Year 2013 "Pilot Program for Enhancement of Contractor Employee Whistleblower Protections" (41 USC 4705, 4712) and regulations set forth in FAR Part 3.9 and DFARS Part 203.9, 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 Federal contract,
- gross waste of Federal funds,
- abuse of authority relating to a Federal contract,
- substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to a Federal contract (including the competition for or negotiation of a contract).

"Abuse of authority," as used in this policy, means an arbitrary and capricious exercise of authority that is inconsistent with the mission of DoD or the successful performance of a DoD contract.

The employee may make protected disclosures to any of the following:

- A Member of Congress or a representative of a committee of Congress;
- An Inspector General;
- The Government Accountability Office;
- A Federal employee responsible for contract oversight or management of the relevant agency;
- 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.

An employee who initiates or provides evidence of contractor or subcontractor misconduct in any judicial or administrative proceeding relating to fraud, waste or abuse on a Federal contract shall be deemed to have made a disclosure.

Any contractor employee who believes that he or she has been discharged, demoted, or otherwise discriminated against contrary to the policy may file a complaint with the Inspector General of the agency concerned. The employee may find the procedures for filing such a complaint at the Office of the Inspector General Hotline or Whistleblower Internet sites. The Company will inform its employees of Employer Whistleblower Rights as set forth in this Policy in the predominant language of the workforce.

The Company shall flow down these requirements to its subcontractors as required by the Federal Acquisition Regulations.