

# Ethics at ManTech FAQs

## Where can I learn about ManTech's commitment to Ethics?

ManTech's [Values](#) of Trust, Inclusion and Quality guide everything we do. Adhering to our Values helps ensure we earn and protect the trust of our customers, employees and investors through maintaining a foundation of respect, fairness and credibility. ManTech's [Standards of Ethics and Business Conduct](#) outlines the duty of every employee to act with integrity and provides an overview of our ethical and legal requirements across many different business sectors. Another helpful resource is ManTech's [Policies and Procedures](#) site, which contains the policies governing how we conduct ourselves and carry out our work. Checking these sources will assist you in determining whether something you are aware of should be reported.

If you have additional questions about whether a concern should be raised, please reach out! Email ManTech's Corporate Compliance department at [corporate.compliance@mantech.com](mailto:corporate.compliance@mantech.com) to receive guidance on a question or concern, or ask a question anonymously using the Ask a Question feature of the [ManTech Helpline](#).

## Who should I contact if I am aware of an ethical violation?

When you observe behavior that you believe violates our Standards of Ethics and Business Conduct, you have an affirmative responsibility to report it. You should bring any concerns forward to any of the following ManTech Disclosure Channels:

- Your manager, your Sector General Manager or any member of our management team.
- Your Human Resources representative. If you don't know who your HR representative is, you can find out by using the "Get Help From HR" function on [Service Now](#).
- Corporate Compliance at [corporate.compliance@mantech.com](mailto:corporate.compliance@mantech.com)
- Functional Points of Contacts found [here](#)
- Security at 877-996-4248 (option 9)
- The Employee Relations Center (ERC) at [Employee.Relations@mantech.com](mailto:Employee.Relations@mantech.com)
- The [ManTech Helpline](#) by phone or online. The ManTech Helpline is run by an independent third-party provider and concerns may be reported anonymously, to the extent permitted by law.

## Why should I report what I know? What's in it for me?

We all have the right to work in a positive and comfortable environment. As such, we also have a responsibility to act ethically, and to report any known, suspected or observed violations of ManTech Values, Standards of Ethics, Policies and Procedures, or legal or contractual obligations. By working together, we can maintain a healthy and productive work environment.

## Does management really want me to report?

Yes. In fact, because you are closest to the daily activities and knowledgeable of both the good and the bad things that may be occurring, reporting your knowledge or observation of an activity that may be cause for concern is critical. Your report can minimize the potential negative impact on ManTech and our people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

## When I raise a concern, where does my report go?

When you raise a report to any of the ManTech disclosure channels, your report will be kept confidential to the greatest extent possible. Depending on the issue raised, the concern will be directed to the appropriate department such as Human Resources, Corporate Compliance or Security for review and/or investigation.

When you raise a report through the [ManTech Helpline](#), your report will be entered directly onto a secure server managed by our 3rd Party Helpline Provider, EthicsPoint. EthicsPoint makes these reports available only to specific individuals within ManTech who are charged with evaluating the report, based on the type of violation and location of the incident.

## When I raise a concern, what information will I be asked to provide?

The more information you provide, the better we'll be able to evaluate and investigate your concern. Providing the below details will help us understand and address the issue(s) raised:

- The chronology of events that occurred, and any relevant background, history or context related to the concern
- The name of your program or business unit
- The location where the concern or incident occurred
- The name of the person you believe may have engaged in misconduct
- Any witnesses to the event or concern
- Any documents that may be related to your report or may be relevant for an investigator to review

***You don't need to have all of the above information to raise a concern. If you have a "good faith" belief that misconduct has occurred, speak up with the facts that you have.*** The appropriate ManTech team will look into the matter to determine if misconduct has occurred.

Although you may remain anonymous if you contact the ManTech Helpline, you are encouraged to provide your contact information so that we may keep you informed, ask follow-up questions, and provide you with the outcome of the investigation. A report can only be followed up if it contains sufficient information and there is a reasonable possibility of obtaining further information.

## What is "Retaliation"?

Retaliation is when an individual is targeted or treated less favorably because they raised a concern, participated in an investigation, or refused to do something that would violate ManTech's policies and procedures. The following examples could constitute retaliation if done in retribution for any of the aforementioned activities:

- Involuntary transfer to a job you did not seek, or changes in job duties, job level or compensation (without a legitimate business reason).
- Verbal bullying to include berating, yelling at or speaking to employees in a disrespectful manner. Acting in ways to intentionally embarrass an employee.
- Intentionally isolating or excluding employees, including withholding information they need to do their jobs or excluding them from meetings, events, or discussions that they should participate in.
- Denying benefits or training opportunities for which they are eligible and which are provided to others.
- Intentionally requiring unrealistic work output or deadlines to cause an employee to fail
- Providing unjustified or unsupported negative performance feedback

## **\*For Managers: As a manager, what do I need to know about retaliation?**

As a manager, you are expected to model ethical behavior and ensure an environment of trust and respect is maintained at all times. It is your responsibility to understand what actions could constitute retaliation (examples listed above) and to never engage in retaliation against employees, or subject employees to retribution for any reason. Additionally, make sure your employees know that they can come to you if they suspect that they or someone else is being retaliated against. Let them know that ManTech has zero tolerance for retaliation and that their concern will be investigated appropriately and as confidentially as possible.

Remember, in some instances, taking legitimate employment actions close in time to an employee raising a concern can create the perception of retaliation. Therefore, you should always seek guidance from HR before taking any adverse action with employees who have reported an issue or participated in an investigation.

## **How do I know that I won't be retaliated against?**

When you make a report in good faith, ManTech [policy](#) protects you from retaliation. Every effort is made to maintain confidentiality of the information reported and ManTech is committed to fostering a "Speak Up" culture where you feel comfortable raising your concerns without fear of retaliation.

## **What do I do if I think I'm being retaliated against?**

If you feel you are being retaliated against, contact Human Resources at [Employee.Relations@mantech.com](mailto:Employee.Relations@mantech.com) or Corporate Compliance at [corporate.compliance@mantech.com](mailto:corporate.compliance@mantech.com). Again, ManTech has zero tolerance for retaliation. Claims of retaliation will be fully investigated and anyone found to be engaging in retaliation can face disciplinary action, up to and including termination.

## **\*For Managers: What should I do when an employee raises a concern to me?**

Employees often speak to their supervisors first when they have a question or concern. Encourage communication with your employees by maintaining an open-door policy. If an employee comes to you with a concern:

- Listen carefully to ensure you understand the issue(s) raised.
- Respect the employee's privacy and maintain their confidentiality. Let the employee know the concern will be handled as confidentially as possible.
- Do not attempt to investigate yourself.
- Bring concerns that appear to require investigation to Human Resources, Corporate Compliance or Security for review and possible action.
- Remain accessible to investigators as well as the employee who raised the concern and any other individuals involved in the investigation.
- Work with investigators to determine any appropriate remedial or disciplinary action needed once an investigation is concluded.
- Be aware of the work environment to ensure no one is being retaliated against for participating in an investigation.

## **How long does it take for an ethics investigation to be completed?**

Depending on the nature and complexity of the concern raised, a full investigation may take one week to several months. The average time for ManTech to complete an investigation is 30 days.

## **How often are Ethics cases substantiated?**

In 2022, 45% of Ethics cases were substantiated and 55% of cases were unsubstantiated.\* Unsubstantiated means that either: (1) the facts obtained during the investigation did not support the allegation or, (2) there was insufficient information to determine if the allegation was true.

## **What typically happens when an ethics investigation is substantiated?**

If an allegation is substantiated, the findings of the investigation are provided to the appropriate level of management to determine any corrective actions required with our customers and vendors. Additionally, Human Resources and management work together to determine and the level of discipline required for any employees involved in misconduct. At ManTech, all disciplinary and corrective actions go through the ERC before they are approved and enacted. The type of discipline enacted varies depending on the type and severity of misconduct. Some examples of disciplinary actions that could be implemented include counseling, verbal or written warnings, demotion, suspension without pay, or termination of employment. Due to privacy concerns, specific information regarding disciplinary action taken with an individual cannot be shared with you.

## **What can I do if I disagree with an unsubstantiated outcome for an ethics investigation I reported?**

Contact Corporate Compliance at [corporate.compliance@mantech.com](mailto:corporate.compliance@mantech.com) if you disagree with the outcome of an investigation. Investigations at ManTech are conducted in an objective and comprehensive manner and include a thorough review of available information before an outcome is reached. If you have information that demonstrates an independent review of an investigation is warranted, Corporate Compliance or another appropriate team will conduct such a review.

## **About the ManTech Helpline**

### **What is the ManTech Helpline?**

The [ManTech Helpline](#) is managed by a 3rd party vendor called NAVEX, using a system called EthicsPoint. EthicsPoint is a comprehensive and confidential 3rd party reporting tool created by NAVEX to assist management and employees in working together to address potential fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment.

### **Why do we need a system like ManTech Helpline?**

- We believe that our employees are our most important asset. By creating open channels of communication, we can maximize transparency and promote a positive work environment.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to provide a confidential way for employees to report fraudulent and wrongful behavior.
- An effective reporting system will augment our efforts to foster a culture of integrity, inclusion and ethical decision-making.

### **May I report with the ManTech Helpline using either the internet or the telephone?**

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

### **It is my understanding that any report I send from a company computer generates a server log that shows every website that my computer connects with. Won't this log identify me as a report originator?**

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your computer to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity. If you feel uncomfortable making a report on your work computer, you have the option of using a computer outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website.

### **Can I file an EthicsPoint report from home and still remain anonymous?**

A report from home, a neighbor's computer, or any internet portal will remain secure and anonymous. An internet portal never identifies a visitor by screen name and the EthicsPoint system strips away internet addresses so that anonymity is maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

## **I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?**

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

## **Is the telephone toll-free hot line confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

## **What if I want to be identified with my EthicsPoint report?**

There is a section in the report for identifying yourself and doing so often makes it easier to investigate the allegation more thoroughly.

## **What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?**

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique username and are asked to choose a password. You can return to the EthicsPoint system again either by internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions.

## **Are these follow-ups on reports as secure as the first one?**

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

## **Can I still file a report if I don't have access to the internet?**

If you don't have access to the internet, you can raise a concern in person or by telephone to anyone in your management chain, your HR representative, a member of the Corporate Compliance team, a member of ManTech's Security team, or any of the resources listed [here](#).

If you don't have access to internet or are uncomfortable using a computer, you can also call the ManTech Helpline, at 866-294-9442, which is toll-free and available 24 hours a day, 365 days a year.

*\*Substantiation rate includes Ethics cases only and does not represent Insider Threat, Security, or Human Resources investigations.*

*In business more than 53 years, ManTech excels in full-spectrum cyber, data collection & analytics, enterprise IT, systems engineering and software application development solutions that support national and homeland security.*

### **LEARN MORE**

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