The following pages contain the detailed scoring for your company based on public information.

The following table represents a summary of your scores:

<table>
<thead>
<tr>
<th>Topic</th>
<th>Number of questions</th>
<th>% score based on public information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leadership, Governance and Organisation</td>
<td>10</td>
<td>45%</td>
</tr>
<tr>
<td>Risk Management</td>
<td>5</td>
<td>0%</td>
</tr>
<tr>
<td>Company Policy and Codes</td>
<td>12</td>
<td>66.7%</td>
</tr>
<tr>
<td>Training</td>
<td>5</td>
<td>20%</td>
</tr>
<tr>
<td>Personnel and Helplines</td>
<td>7</td>
<td>78.6%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>39</strong></td>
<td><strong>48.7%</strong></td>
</tr>
</tbody>
</table>

TI has found no evidence that the company is involved in offsets and has therefore removed the two relevant questions (A13a and A13b).
A1:

Does the company publish a statement from the Chief Executive Officer or the Chair of the Board supporting the ethics and anti-corruption agenda of the company?

Score:

1

Comments:

Based on public information, there is evidence that the company publishes a single statement from the Chairman and Chief Executive Officer, and the Executive Team, supporting the ethics and anti-corruption agenda of the company. The company therefore scores 1. To score higher the company would need to provide evidence of at least two other such statements from the last two years, or one statement from the last two years that specifically addresses the company’s strong stance against corruption.

References:

Public:
Standards of Ethics and Business Conduct (2014), p.i:
‘Message from the Chairman & CEO and the Executive Team
Dear Colleague,
ManTech’s outstanding reputation with our customers, teammates and competitors is dependent on our strict adherence to the highest standards of ethics and business conduct. News headlines regularly illustrate the impact of unethical behavior on business and the importance of maintaining an unwavering commitment and alertness to integrity and ethics. The increasingly competitive marketplace we operate in makes reliance on our Standards of Ethics and Business Conduct more important than ever. Our Standards summarize the principles that guide our actions when dealing with customers, suppliers, teammates, competitors and each other in the workplace. All employees, officers and directors are expected to comply with the guidance and policies set forth in our Standards. Please read our Standards carefully and make sure that you understand them and the important connection between our Standards and the success of our corporation. The guidance in our Standards provides a foundation for ethical decision-making and will help you uphold ManTech’s core values and principles. If you have questions, please speak to your supervisor or any of the other resources identified in our Standards. We recognize and value the important role that each employee has in shaping ManTech’s future and defining our corporate reputation. Because our daily efforts involve critical national security technology
programs, often at the highest security levels, we strive to uphold standards of conduct that exceed those used by most of our nation’s corporations. We are proud of the outstanding job you do every day and how your work helps to define ManTech as a committed, innovative industry leader and trustworthy business partner. Thank you for maintaining our Standards by conducting yourself with uncompromising integrity and ethics.’

http://files.shareholder.com/downloads/AMDA-NJ9O/3333853481x0x532781/0c0f6676-c78e-4836-9b2f-8ae07a3a2827/Standards_of_Ethics_2011_FINAL_revised2.pdf
A2:

Does the company’s Chief Executive Officer or the Chair of the Board demonstrate a strong personal, external facing commitment to the ethics and anti-corruption agenda of the company?

Score:

1

Comments:

Based on public information, there is evidence that an external facing commitment to the ethics and anti-corruption agenda of the company is delegated to other individuals. The General Counsel has attended a whistleblowing event, the Executive Director of Services has attended an anti-fraud event, and the Vice President of Industry Compliance has attended an Ethics, OCI and Compliance event. The Executive Director of Services, Jim Butterworth, maintains certification as a Certified Fraud Examiner (CFE). The company therefore scores 1. To score higher the company would need to provide evidence that the Chief Executive Officer or the Chair of the Board has demonstrated such external facing commitment.

References:

Public:
ACC Website: WMACCA Chapter
‘Wmacca 2014 Conference On Ethics And Compliance For Government Contractors:Avoid Being An April Fool - Government Contract Compliance To Put You In First Place,And Keep You Off The Front Page’
‘First Things First – Developing Best-In-Class Compliance And Ethics Programs
The Whistle Has Blown, but the Game is Just Starting - Hot Topics in Whistleblower Claims and Litigation
Presented by Connie N. Bertram and of Proskauer Rose LLP and Daniel J. Davis; and Jeff Brown, General Counsel, ManTech International Corporation. This session will offer practical advice concerning some of the more challenging issues that confront contractors in investigating and defending False Claim Act and other whistleblower claims, including: handling claims by current employees, including in-house counsel and compliance personnel; addressing self-help discovery by putative whistleblowers; managing the impact of a contractor’s potential mandatory disclosure obligation; and conducting effective investigations, including forensics and data preservation.’
http://www.acc.com/chapters/wmacca/index.cfm?eventID=15013
Fraud Conference website: 25th Annual AFCE Global Fraud Conference
‘Concurrent Session Speakers
The ACFE Global Fraud Conference also features more than 40 anti-fraud experts leading our breakout sessions. These experienced practitioners share insights, tips and techniques through case studies and real-world examples.
JIM BUTTERWORTH, CFE
Executive Director of Services
ManTech


ACFE website: Jim Butterworth
‘Jim Butterworth is the Executive Director of Services at ManTech.’
‘Jim is the recipient of the Naval Security Group Command Meritorious Service Award, Navy Commendation Medal (Gold Star in lieu of 5th Award), and Navy Achievement Medal (Gold Star in lieu of 5th Award). Jim maintains certification as a Certified Fraud Examiner (CFE), and holds multiple security industry certifications as Intrusion Analyst, Reverse Engineer, Forensic Examiner and Auditor.’


American Conference Institute’s 3rd Advanced Forum on Government Contracting: Ethics, OCI & Compliance (October, 2010), p.5:
‘David J. Roll, CPA and Vice President of Industry Compliance as a guest speaker
This unique industry event will provide best practices and strategic insights on how to:

• Incorporate tightened organizational conflict of interest (OCI) rules into your company’s mitigation plan
• Minimize the risk of False Claims Act violations (FCA) and prepare for US DOJ’ focus on FCA enforcement
• Meet FAPIIS requirements and certify compliance for bids and proposals
• Comply with stricter limits on gifts, entertainment and contributions under new lobbying disclosure rules
• Identify what triggers mandatory reporting and what government expects from “full cooperation”
• Upgrade your internal controls and policies to ensure compliance with more rigorous ethics requirements
• Comply with trade agreements and certify country of origin
• Meet new contractor requirements in Iraq and Afghanistan’

A3:
Does the company’s Chief Executive Officer demonstrate a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company, actively promoting the ethics and anti-corruption agenda at all levels of the company structure?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the Chief Executive Officer demonstrates a strong personal, internal-facing commitment to the ethics and anti-corruption agenda of the company.

References:
Public:
NA
A4:
Does the company publish a statement of values or principles representing high standards of business conduct, including honesty, trust, transparency, openness, integrity and accountability?

Score: 2

Comments:
Based on public information, there is evidence that the company publishes a statement of values representing high standards of business conduct, including trust, integrity, honesty, and accountability. These values are briefly explained in the Standards of Ethics and Business Conduct and on the company’s website.

References:
Public:
Standards of Ethics and Business Conduct (2014), p.ii:
‘Core Values
ManTech’s three core values form the basis of our corporate culture and operating principles, and are the catalyst for our professional ethics and our commitments. With uncompromising integrity and ethics, we value:
• Our position of trust with our customers – its foundation in partnership, mutual respect, fairness and commitment to mission is fundamental to our success in all business engagements. Our dedication to program execution makes a difference.
• Our people – their passion for the mission, intellectual capital, creativity and ability to lead, make our reputation and ensure the success of our company. Our collaboration, teamwork and diversity make a difference.
• Our quality - in all that we do, through our quest for excellence, value creation and innovation, we seek to deliver the best value for our customers and always improve all elements of our business. We understand the mission and our focus on ideas and solutions makes a difference.
Professional Ethics
ManTech’s ethics are CLEAR. Business conducted on behalf of ManTech should always demonstrate
uncompromising integrity and be guided by these essential professional ethics:
• Compliance – with laws, regulations, security requirements and company policies
• Loyalty – to ManTech and our business interests
• Esteem – for ManTech’s values and our tradition of mission before self
• Accountability – for all our actions and commitments
• Respect – for ourselves and for others’

(p.1): ‘Procurement Integrity and Antitrust (CO 501 & CO 502)
ManTech must compete fairly and ethically for all business opportunities. Potential or actual possession or use of a competitor’s rates, competitor’s proprietary information or Government source selection information can violate law and compromise the integrity of the procurement process. We are committed to conducting business in accordance with antitrust laws, which promote open and fair competition by prohibiting anticompetitive behavior and unfair business practices.’

(p.3): ‘We are all responsible for contributing to the creation and maintenance of a respectful workplace environment that is free from discrimination and harassment. Supervisors and managers have a heightened responsibility to foster a workplace that supports honesty, integrity, respect and trust.’

(p.11): ‘ManTech’s filings with the Securities and Exchange Commission must be accurate and timely. The Chief Executive Officer, the Group Presidents, the Chief Financial Officer, the Chief Accounting Officer, senior business operations personnel and any other employees involved in the financial reporting process bear a special responsibility for promoting integrity throughout ManTech and fostering a culture that ensures the fair and timely reporting of ManTech’s financial results and operating condition to the public. Accordingly, if you hold one of the aforementioned positions, you are required to abide by the following Financial Code of Ethics, which reinforce and add to the concepts set forth in our Standards. Specifically, you must agree that you will at all times:
• Act with honesty and integrity, avoiding actual or apparent conflicts of interest in your personal and professional relationships.
• Provide and/or prepare information in a manner and of a quality to ensure the full, fair, accurate, timely and understandable disclosure of information in ManTech’s public communications, including the reports and documents that ManTech files with, or submits to, the Securities and Exchange Commission.’

Company Website: Mission, Vision, Values
‘Mission, Vision, Values
Mission
ManTech advances customer success by delivering unique best value solutions, consulting services, and technologies that meet our clients’ mission-critical needs—anytime and anywhere—and we create added value through quality, innovation, and partnership.

Vision

MANTECH INTERNATIONAL CORPORATION 17/06/14
WWW.MANTECH.COM
ManTech will be our customers’ most trusted industry partner, integral to their success. Our mission-driven company will be a strategy-focused organization, operating as One ManTech. We will be valued by our customers, esteemed by fellow employees, embraced by teammates, respected by competitors, prized by shareholders, and appreciated by our communities.

Values

With uncompromising integrity and ethics we value...

Our position of trust with our clients—it’s foundation in partnership, respect, fairness, credibility, and keeping our commitments is fundamental to success in all our engagements.

Our people—their passion for the mission, intellectual capital, creativity, and ability to lead make our reputation and ensure the success of our company.

Quality in all that we do—by our quest for excellence, value creation, and innovation we seek to deliver the best value for our clients and always improve all elements of our business.’

http://www.mantech.com/about/Pages/Mission.aspx
A5:
Does the company belong to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company belongs to one or more national or international initiatives that promote anti-corruption or business ethics with a significant focus on anti-corruption.

References:

Public:
NA
A6:
Has the company appointed a Board committee or individual Board member with overall corporate responsibility for its ethics and anti-corruption agenda?

Score:

2

Comments:
Based on public information, there is evidence that the company has appointed the Audit Committee with overall corporate responsibility for its ethics and anti-corruption agenda.

References:
Public:
Audit Committee Charter (March 2010), p.4:
‘12. Oversee the establishment and periodic review and update of the Company’s Standards of Ethics and Business Conduct. Oversee management’s monitoring of the Company’s Standards of Ethics and Business Conduct, and obtain reports from management, the Chief Compliance Officer, or the General Counsel, as appropriate, regarding compliance with the Company’s Standards of Ethics and Business Conduct or other significant policies of the Company.’
http://files.shareholder.com/downloads/AMDA-NJY9O/3333853481x0x532756/a4d77637-fe2a-4a7b-a8f9-51148f91af88/Audit_Committee_Charter_-_7th_Amended_and_Restated_Final.pdf
A7:
Has the company appointed a person at a senior level within the company to have responsibility for implementing the company’s ethics and anti-corruption agenda, and who has a direct reporting line to the Board?

Score:

2

Comments:
Based on public information, there is evidence that the company has appointed the Chief Compliance Officer with responsibility for implementing its ethics and anti-corruption agenda. The individual is identified as Terry Myers.

References:

Public:
Audit Committee Charter (March, 2010), p.4:
‘11. Review with the Company’s General Counsel and/or Chief Compliance Officer, as appropriate, (a) legal matters that may have a material impact on the financial statements, (b) any significant reports to, or inquiries received from, regulators or governmental agencies, (c) significant legal compliance policies, and (d) “whistleblower” complaints, significant employee grievances and other complaints relating to the integrity of the Company’s financial statements.

Code of Conduct, p.10:
‘Contacts for Company-Wide Resources
The following resources are available to assist in your understanding of our Standards and reporting of issues and concerns:
Compliance Department (703) 218-6489
Terry Myers, Senior Vice President and Chief Compliance Officer (703) 218-6405’
A8:
Is there regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda?

Score:

1

Comments:
Based on public information, there is some evidence that there is regular Board level monitoring and review of the performance of the company’s ethics and anti-corruption agenda. The Code of Business Conduct is reviewed periodically by Audit Committee. However, it is unclear how often this review process takes place. The company therefore scores 1.

References:
Public:
Audit Committee Charter (March 2010), p.4:
‘12. Oversee the establishment and periodic review and update of the Company’s Standards of Ethics and Business Conduct. Oversee management’s monitoring of the Company’s Standards of Ethics and Business Conduct, and obtain reports from management, the Chief Compliance Officer, or the General Counsel, as appropriate, regarding compliance with the Company’s Standards of Ethics and Business Conduct or other significant policies of the Company.’
A8(a):
Is there a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, and evidence of improvement plans being implemented when issues are identified?

Score:

0

Comments:
Based on public information, there is no readily available evidence of a formal, clear, written plan in place on which the review of the ethics and anti-corruption agenda by the Board or senior management is based, or evidence of improvement plans being implemented when issues are identified.

References:
Public:
NA
A9:  
Does the company have a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal process for review and where appropriate update its policies and practices in response to actual or alleged instances of corruption. TI notes the Audit Committee has responsibility to oversee the Standards of Ethics and Business Conduct, but there is no clear process for such update.

References:

Public:

TI notes:

Audit Committee Charter (March 2010), p.4:

‘11. Review with the Company’s General Counsel and/or Chief Compliance Officer, as appropriate, (a) legal matters that may have a material impact on the financial statements, (b) any significant reports to, or inquiries received from, regulators or governmental agencies, (c) significant legal compliance policies, and (d) “whistleblower” complaints, significant employee grievances and other complaints relating to the integrity of the Company’s financial statements.

12. Oversee the establishment and periodic review and update of the Company’s Standards of Ethics and Business Conduct. Oversee management’s monitoring of the Company’s Standards of Ethics and Business Conduct, and obtain reports from management, the Chief Compliance Officer, or the General Counsel, as appropriate, regarding compliance with the Company’s Standards of Ethics and Business Conduct or other significant policies of the Company.

13. Discuss with management and the independent auditor any correspondence with regulators or governmental agencies and any employee complaints or published reports that raise material issues regarding the Company’s financial statements, accounting and/or internal control policies.

14. Establish procedures for (a) the receipt, retention, and treatment of complaints received
by the Company regarding accounting, internal accounting controls, or auditing matters; and (b) the confidential, anonymous submission by employees of the Company of concerns regarding questionable accounting or auditing matters.
A9(a):
Does the company have a formal anti-corruption risk assessment procedure implemented enterprise-wide?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure implemented enterprise-wide. It is unclear if risk assessment processes apply to anti-corruption, and there is no evidence of corresponding mitigation plans. TI notes the risk declaration in the Form 10-K declaration.

References:
Public:
TI notes:
Proxy Statement (April 2014), p.8:
‘Board’s Role in Risk Oversight
The Board oversees the management of risks inherent in the operation of the Company’s business. The Board oversees the management of risk principally through the Audit Committee. Among other activities, the Audit Committee oversees the Company’s enterprise risk management program. Additionally, the Board oversees certain of the Company’s business activities (particularly those designated as classified by the U.S. government) through the Special Programs Oversight Committee. Finally, the Board fulfills its responsibility for overseeing the assessment of risks associated with the Company’s compensation policies and programs through the Compensation Committee. Each of these committees regularly receives reports from, and discusses those reports with, members of management who are responsible for applicable day-to-day risk management functions of the Company. The Board’s role in risk oversight has not had any effect on the Board’s leadership structure.’

Annual Report (2013), p.17:
‘If we fail to comply with complex procurement laws and regulations, we could lose business and be liable for various penalties or sanctions. We must comply with laws and regulations relating to the formation, administration and performance of federal government contracts. These laws and regulations affect how we conduct business with our federal government
customers. In complying with these laws and regulations, we may incur additional costs. Non-compliance could result in the imposition of fines and penalties, including contractual damages. Among the more significant laws and regulations affecting our business are the following:’

‘• The Foreign Corrupt Practices Act.

Failure to comply with these laws and regulations can lead to severe penalties, both civil and criminal, and can include debarment from contracting with the U.S. government.

Our contracting agency customers periodically review our compliance with procurement laws and regulations, as well as our performance under the terms of our federal government contracts. If a government review or investigation uncovers improper or illegal activities, we may be subject to civil or criminal penalties or administrative sanctions, including:

• Termination of contracts;
• Forfeiture of profits;
• Cost associated with triggering of price reduction clauses;
• Suspension of payments;
• Fines; and
• Suspension or debarment from doing business with federal government agencies.’
A10:
Does the company have a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company has a formal anti-corruption risk assessment procedure for assessing proposed business decisions, with clear requirements on the circumstances under which such a procedure should be applied.

References:

Public:
NA
A11:
Does the company conduct due diligence that minimises corruption risk when selecting or reappointing its agents?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company conducts due diligence that minimises corruption risk when selecting or reappointing agents.

References:
Public:
NA
A12:

Does the company have contractual rights and processes for the behaviour, monitoring, control, and audit of agents with respect to countering corruption?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has contractual rights and processes for the behaviour, monitoring, control and audit of agents with respect to countering corruption.

References:

Public:
NA
A13:
Does the company make clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company makes clear to contractors, sub-contractors, and suppliers, through policy and contractual terms, its stance on bribery and corruption and the consequences of breaches to this stance.

References:
Public:
NA
A13(a):
Does the company explicitly address the corruption risks associated with offset contracting?

Score:
NA

Comments:
Based on public information, there is no readily available evidence that the company engages in offset contracting.

References:
Public:
NA
A13(b):
Does the company conduct due diligence that minimises corruption risk when selecting its offset partners and offset brokers?

Score:
NA

Comments:
Based on public information, there is no readily available evidence that the company engages in offset contracting.

References:
Public:
NA
A15:
Does the company have an anti-corruption policy that prohibits corruption in its various forms?

Score:

2

Comments:
Based on public information, there is evidence that the company has an anti-corruption policy that prohibits corruption in its various forms, including improper gifts and facilitation payments.

References:
Public:
Standards of Ethics and Business Conduct (2014), p.2:
‘Offering Gifts and Entertainment
If we offer a gift, meal, entertainment or other accommodation to a non-ManTech employee in connection with ManTech business, it must be professional in nature and not excessive in cost. Employees should consider the customer’s gift policies and refrain from providing gifts or entertainment that may violate such policies. Gifts should not be given if they could appear to influence the objectivity of the customer’s business decisions. Due to the regulations that govern offers of gifts to Government officials and employees, we must be sensitive to the impropriety a gift offer may pose to our customers.’

‘Antibribery, Kickbacks and Gifts in Foreign Countries or to Foreign Nationals (CG 310)
It is unlawful to offer or accept anything of value to/from a U.S. Government customer/employee in return for favorable treatment on a contract or subcontract. This is also true in a foreign country, even if the customary business practice in a foreign country is to exchange gifts. The U.S. Foreign Corrupt Practices Act (FCPA) prohibits giving anything of value, directly or indirectly, to foreign officials, political candidates or foreign governments to influence business. Furthermore, the laws of some foreign countries prohibit all gifting to government officials or government entities. Therefore, any plan for gifting to foreign persons or entities must be pre-cleared by the Corporate Compliance Department. In cases where such gifting is necessary and permissible, only ManTech may provide the gift and any gifts received by ManTech employees will become ManTech property. In addition, any gifts must be accurately accounted for in ManTech’s books and records. Facilitating payments or so-called “grease payments” made to expedite the approval of permits or licenses, or to prompt the expeditious performance of similar low-level ministerial duties are specifically
(p.5): ‘Receipt of Gifts and Entertainment
Your business decisions for ManTech should be based on your unbiased judgment. Interactions with suppliers, customers, competitors, contractors and consultants should always be in accordance with ManTech’s best interests. Therefore, it is not appropriate to ask for gifts and you should not accept gifts or other benefits if doing so could affect your objective business judgment. The receipt of an unsolicited gift or business courtesy, including meals and entertainment, is permissible if the item or offering is: (i) customary and a commonly accepted business courtesy; (ii) not excessively valuable; (iii) given and accepted without an express or implied understanding that you are in any way obligated by your acceptance of the gift; and (iv) not a reward for any particular business decision already made or forthcoming. Gifts of cash or cash equivalents (including gift certificates, securities, below-market loans, etc.) of any value must be refused or returned promptly to the donor. If you have a concern regarding the receipt of a gift by any ManTech employee, please check with the Corporate Compliance Department.’

(p.6): ‘Personal Conflict of Interest (CG 306)
Your work for ManTech must be performed in accordance with the best interests of ManTech and its customers. A personal conflict of interest exists when your own interests interfere with the objective execution of your job duties to your customer and/or ManTech. You should avoid activities that could hinder the objectivity of the business decisions you make on behalf of ManTech. Personal conflicts of interest are generally prohibited and any exceptions must be approved in writing by the Chief Compliance Officer.’
A16:
Is the anti-corruption policy explicitly one of zero tolerance?

Score:
1

Comments:
Based on public information, there is no readily available evidence that the anti-corruption policy is explicitly one of zero tolerance. However, the company has a zero tolerance policy of violations of the Code of Business Ethics and Conduct, as shown by its explicit commitment to apply disciplinary procedures in the event of a violation by any employee or director. The company therefore scores 1.

References:
Public:
Standards of Ethics and Business Conduct (2014), p.11:
‘Violations of this Financial Code of Ethics, including failure to report potential violations by others, are a serious matter that may result in significant disciplinary action, up to and including termination of employment with ManTech. If you believe a violation of this Financial Code of Ethics has occurred, you should contact the Corporate Compliance Department, the Corporate Legal Department or the Ethics Helpline. Alternatively, you may contact the Chairman of the Audit Committee of the Board of Directors through the Ethics Helpline.’

(p.2): ‘Antibribery, Kickbacks and Gifts in Foreign Countries or to Foreign Nationals (CG 310)
It is unlawful to offer or accept anything of value to/from a U.S. Government customer/employee in return for favorable treatment on a contract or subcontract. This is also true in a foreign country, even if the customary business practice in a foreign country is to exchange gifts. The U.S. Foreign Corrupt Practices Act (FCPA) prohibits giving anything of value, directly or indirectly, to foreign officials, political candidates or foreign governments to influence business. Furthermore, the laws of some foreign countries prohibit all gifting to government officials or government entities. Therefore, any plan for gifting to foreign persons or entities must be pre-cleared by the Corporate Compliance Department. In cases where such gifting is necessary and permissible, only ManTech may provide the gift and any gifts received by ManTech employees will become ManTech property. In addition, any gifts must be accurately accounted for in ManTech’s books and records. Facilitating payments or so-called “grease payments” made to expedite the approval of permits or licenses, or to
prompt the expeditious performance of similar low-level ministerial duties are specifically prohibited by ManTech policy.’
A17:
Is the company’s anti-corruption policy easily accessible to Board members, employees, contracted staff and any other organisations acting with or on behalf of the company?

Score:

2

Comments:
Based on public information, there is evidence that the company’s anti-corruption policy is easily accessible to Board members, employees, and third parties. The company’s policy is available online on the company website and the policies are also outlined on the company’s intranet.

References:
Public:
Standards of Ethics and Business Conduct (2014):
http://files.shareholder.com/downloads/AMDA-NJY90/3333853481x0x532781/0c0f6676-c78e-4836-9b2f-8ae07a3a2827/Standards_of_Ethics_2011_FINAL_revised2.pdf

Standards of Ethics and Business Conduct (2014), p.9:
‘Policies cited in our Standards can be found on the ManTech intranet along with additional policies and procedures that govern many of the topics in our Standards. If you become aware of an issue that cannot be resolved through application of this guidance, you should seek advice from one of the referenced sources. Your electronic acceptance or return of the acknowledgement form for our Standards represents your receipt, understanding and commitment to comply with them.’
A17(a):
Is the company’s anti-corruption policy easily understandable and clear to Board members, employees and third parties?

Score:
2

Comments:
Based on public information, there is evidence that the company’s anti-corruption policy is easily understandable and clear to Board members, employees and third parties. The policy is written in accessible, comprehensible language and can be easily understood by a non-legal audience.

References:
Public:
Standards of Ethics and Business Conduct (2014), p.2:
‘Offering Gifts and Entertainment
If we offer a gift, meal, entertainment or other accommodation to a non-ManTech employee in connection with ManTech business, it must be professional in nature and not excessive in cost. Employees should consider the customer’s gift policies and refrain from providing gifts or entertainment that may violate such policies. Gifts should not be given if they could appear to influence the objectivity of the customer’s business decisions. Due to the regulations that govern offers of gifts to Government officials and employees, we must be sensitive to the impropriety a gift offer may pose to our customers.’
A18:
Does the anti-corruption policy explicitly apply to all employees and members of the Board?

Score:
2

Comments:
Based on public information, there is evidence that the company’s anti-corruption policy explicitly applies to all employees and directors.

References:
Public:
Standards of Ethics and Business Conduct (2014), p.i:
‘All employees, officers and directors are expected to comply with the guidance and policies set forth in our Standards.’
A20:
Does the company have a policy on potential conflicts of interest, and does it apply to both employees and board members?

Score:
2

Comments:
Based on public information, there is evidence that the company has a policy on potential conflicts of interest for employees and board members. The company provides a definition of conflicts of interest and several examples.

References:
Public:
Standards of Ethics and Business Conduct (2014), p.6:
‘Personal Conflict of Interest (CG 306)
Your work for ManTech must be performed in accordance with the best interests of ManTech and its customers. A personal conflict of interest exists when your own interests interfere with the objective execution of your job duties to your customer and/or ManTech. You should avoid activities that could hinder the objectivity of the business decisions you make on behalf of ManTech. Personal conflicts of interest are generally prohibited and any exceptions must be approved in writing by the Chief Compliance Officer. Employees should raise potential personal conflicts of interest with their supervisor or the Corporate Compliance Department to determine if the activity is prohibited by ManTech Policy. While employed at ManTech and during the twelve-month period following termination of employment with ManTech, employees/former employees are prohibited from soliciting or inducing any current employee of ManTech to engage in employment discussions with a competitor. During this same period, employees are prohibited from participating in any bid process for a program or prospective program that is competitive with a bid by ManTech and current employees must not engage in any outside business activity that is competitive with ManTech’s business.
Did You Know?
A personal conflict of interest can develop if you participate in outside work activities that could influence your professional objectivity. In many cases afterhours work does not create a conflict with ManTech’s interests. However, you should review the arrangement with the Corporate Compliance Department to ensure your other work does not create a conflict.
A few examples of when a personal conflict of interest likely would occur are:

- Serving on the advisory board of a competitor
- Providing outside consulting services as an extension of the work you do at ManTech
- Not disclosing a familial relationship when someone in your family is seeking to do business with ManTech and you are involved in the decision making process
- Conducting an outside business that solicits ManTech customers or employees

For additional information, you should consult ManTech policy CG 306 – Personal Conflict of Interest and discuss any questions with your supervisor or Corporate Compliance."
A21:

Does the company have a policy for the giving and receipt of gifts to ensure that such transactions are bona fide and not a subterfuge for bribery?

Score:

1

Comments:

Based on public information, there is some evidence that the company has a policy for the giving and receipt of gifts, to ensure that such transactions are bona fide and not a subterfuge for bribery. The giving and receiving of gifts is limited and there are clear thresholds for gifts related to US government employees. For some gifts to federal employees and state or local government employees, the company requires a Corporate Compliance Department approval. The company therefore scores 1. To score higher the company would need to provide evidence that it sets upper limits for gift exchange with all individuals, not just US government employees.

References:

Public:

Standards of Ethics and Business Conduct (2014), p.2:

‘Offering Gifts and Entertainment

If we offer a gift, meal, entertainment or other accommodation to a non-ManTech employee in connection with ManTech business, it must be professional in nature and not excessive in cost. Employees should consider the customer’s gift policies and refrain from providing gifts or entertainment that may violate such policies. Gifts should not be given if they could appear to influence the objectivity of the customer’s business decisions. Due to the regulations that govern offers of gifts to Government officials and employees, we must be sensitive to the impropriety a gift offer may pose to our customers. The Federal Executive Branch, which covers most of ManTech’s customers, has gratuity regulations that prohibit contractors from giving anything of value to Government employees, except as follows:

• ManTech advertising or promotional items of little intrinsic value (generally items that are valued at less than $20, but totaling no more than $50 annually per federal employee);
• Modest refreshments such as coffee, soft drinks and donuts on an occasional basis; or
• Business-related meals and local transportation having an aggregate value of $20 or less per occasion, but totaling no more than $50 annually per federal employee.

Use of these exceptions, as well as gifts to federal employees and state or local Government employees must be pre-cleared with the Corporate Compliance Department.
Employees are strictly prohibited from extending business courtesies to federal Legislative Branch employees, which includes members of Congress and their staff without approval from the Corporate Compliance Department. Even gifts of nominal value, such as refreshments, meals or transportation must be pre-cleared by the Corporate Compliance Department.

Antibribery, Kickbacks and Gifts in Foreign Countries or to Foreign Nationals (CG 310)

It is unlawful to offer or accept anything of value to/from a U.S. Government customer/employee in return for favorable treatment on a contract or subcontract. This is also true in a foreign country, even if the customary business practice in a foreign country is to exchange gifts. The U.S. Foreign Corrupt Practices Act (FCPA) prohibits giving anything of value, directly or indirectly, to foreign officials, political candidates or foreign governments to influence business. Furthermore, the laws of some foreign countries prohibit all gifting to government officials or government entities. Therefore, any plan for gifting to foreign persons or entities must be pre-cleared by the Corporate Compliance Department. In cases where such gifting is necessary and permissible, only ManTech may provide the gift and any gifts received by ManTech employees will become ManTech property. In addition, any gifts must be accurately accounted for in ManTech’s books and records. Facilitating payments or so-called “grease payments” made to expedite the approval of permits or licenses, or to prompt the expeditious performance of similar low-level ministerial duties are specifically prohibited by ManTech policy.’

(p.5): ‘Receipt of Gifts and Entertainment

Your business decisions for ManTech should be based on your unbiased judgment. Interactions with suppliers, customers, competitors, contractors and consultants should always be in accordance with ManTech’s best interests. Therefore, it is not appropriate to ask for gifts and you should not accept gifts or other benefits if doing so could affect your objective business judgment. The receipt of an unsolicited gift or business courtesy, including meals and entertainment, is permissible if the item or offering is: (i) customary and a commonly accepted business courtesy; (ii) not excessively valuable; (iii) given and accepted without an express or implied understanding that you are in any way obligated by your acceptance of the gift; and (iv) not a reward for any particular business decision already made or forthcoming. Gifts of cash or cash equivalents (including gift certificates, securities, below-market loans, etc.) of any value must be refused or returned promptly to the donor. If you have a concern regarding the receipt of a gift by any ManTech employee, please check with the Corporate Compliance Department.’
A22:

Does the company’s anti-corruption policy include a statement on the giving and receipt of hospitality that ensures that such transactions are bona fide and not a subterfuge for bribery?

Score:

1

Comments:

Based on public information, there is some evidence of that the company has a policy for the giving and receipt of hospitality, to ensure that such transactions are bona fide and not a subterfuge for bribery. The company limits giving hospitality and sets clear upper limits for hospitality. However, these limits only apply to hospitality exchange with US government employees. The company therefore scores 1. To score higher the company would need to provide evidence that it sets upper limits for hospitality exchange with all individuals, not just US government employees.

References:

Public:

Standards of Ethics and Business Conduct (2014), p.2:

‘Offering Gifts and Entertainment

If we offer a gift, meal, entertainment or other accommodation to a non-ManTech employee in connection with ManTech business, it must be professional in nature and not excessive in cost. Employees should consider the customer’s gift policies and refrain from providing gifts or entertainment that may violate such policies. Gifts should not be given if they could appear to influence the objectivity of the customer’s business decisions. Due to the regulations that govern offers of gifts to Government officials and employees, we must be sensitive to the impropriety a gift offer may pose to our customers. The Federal Executive Branch, which covers most of ManTech’s customers, has gratuity regulations that prohibit contractors from giving anything of value to Government employees, except as follows:

• ManTech advertising or promotional items of little intrinsic value (generally items that are valued at less than $20, but totaling no more than $50 annually per federal employee);
• Modest refreshments such as coffee, soft drinks and donuts on an occasional basis; or
• Business-related meals and local transportation having an aggregate value of $20 or less per occasion, but totaling no more than $50 annually per federal employee.
Use of these exceptions, as well as gifts to federal employees and state or local Government employees must be pre-cleared with the Corporate Compliance Department.

Employees are strictly prohibited from extending business courtesies to federal Legislative Branch employees, which includes members of Congress and their staff without approval from the Corporate Compliance Department. Even gifts of nominal value, such as refreshments, meals or transportation must be pre-cleared by the Corporate Compliance Department.’

(p.5):‘Receipt of Gifts and Entertainment
Your business decisions for ManTech should be based on your unbiased judgment. Interactions with suppliers, customers, competitors, contractors and consultants should always be in accordance with ManTech’s best interests. Therefore, it is not appropriate to ask for gifts and you should not accept gifts or other benefits if doing so could affect your objective business judgment. The receipt of an unsolicited gift or business courtesy, including meals and entertainment, is permissible if the item or offering is: (i) customary and a commonly accepted business courtesy; (ii) not excessively valuable; (iii) given and accepted without an express or implied understanding that you are in any way obligated by your acceptance of the gift; and (iv) not a reward for any particular business decision already made or forthcoming. Gifts of cash or cash equivalents (including gift certificates, securities, below-market loans, etc.) of any value must be refused or returned promptly to the donor. If you have a concern regarding the receipt of a gift by any ManTech employee, please check with the Corporate Compliance Department.’
A23:
Does the company have a policy that explicitly prohibits facilitation payments?

Score:

1

Comments:
Based on public information, there is some evidence that the company has a policy that explicitly prohibits facilitation payments. However, the company provides no guidance or supplementary information on how the policy is to be implemented in practice. The company therefore scores 1.

References:

Public:
Standards of Ethics and Business Conduct (2014), p.2:
‘Facilitating payments or so-called “grease payments” made to expedite the approval of permits or licenses, or to prompt the expeditious performance of similar low-level ministerial duties are specifically prohibited by ManTech policy.’
A24:

Does the company prohibit political contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent? Does the company record and publicly disclose all political contributions?

Score:

1

Comments:

Based on public information, there is some evidence that the company regulates political contributions in order to prevent undue influence or other corrupt intent. The company states that employees need prior approval from the Corporate Legal Department before engaging in political activities. However, political contributions are not publicly declared and guidelines on the application of the regulation are not clear. The company therefore scores 1.

References:

Public:
Standards of Ethics and Business Conduct (2014), p.7:
‘Political Contributions and Lobbying

Due to the complexities of the law regarding political contributions and lobbying, no ManTech employee may commit ManTech assets, funds, facilities or personnel on behalf of any candidate, campaign, political party or committee or attempt to legislation without the prior review and approval of the Corporate Legal Department. Each ManTech employee may voluntarily participate in the political process and make personal contributions, as an individual but not as a representative of ManTech. Personal political contributions must not be designed to obtain or retain business or to obtain any other improper advantage for ManTech.’
A25:
Does the company have a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent, and discloses the issues on which the company lobbies?

Score:

1

Comments:
Based on public information, there is some evidence that the company has a clear policy on engagement in lobbying activities, in order to prevent undue influence or other corrupt intent. Employees require prior approval from the Corporate Legal Department before engaging in lobbying. The company therefore scores 1. To score higher the company would need to provide evidence of the specific guidelines of this policy and that it publically discloses the issues on which it lobbies.

References:
Public:
Standards of Ethics and Business Conduct (2014), p.7:
‘Political Contributions and Lobbying
Due to the complexities of the law regarding political contributions and lobbying, no ManTech employee may commit ManTech assets, funds, facilities or personnel on behalf of any candidate, campaign, political party or committee or attempt to legislation without the prior review and approval of the Corporate Legal Department. Each ManTech employee may voluntarily participate in the political process and make personal contributions, as an individual but not as a representative of ManTech. Personal political contributions must not be designed to obtain or retain business or to obtain any other improper advantage for ManTech.’
A25(a): Does the company prohibit charitable contributions, or regulate such contributions in order to prevent undue influence or other corrupt intent?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company prohibits charitable contributions, or regulates such contributions in order to prevent undue influence or other corrupt intent. TI notes that there is limited evidence that the company declares charitable contributions.

References:

Public:
TI notes:
Company Website: Community Outreach
‘Community Outreach
ManTech Marches for Babies
ManTech staff raised more than $1,500 for the March of Dimes by participating in the organization’s March for Babies in Fredericksburg, Virginia. The mission of the March of Dimes is “to improve the health of babies by preventing birth defects, premature birth, and infant mortality.” Each year, more than half a million babies are born prematurely, and more than 120,000 babies are born with serious birth defects. Premature birth is also the number one cause of newborn death. The five-mile walk raised a total of $80,000, which will support the development of treatments and programs to help more babies begin healthy lives.

ManTech Raises $8K+ For Wounded Warrior Project
ManTech hosted a Golf Classic in Fredericksburg, VA to support the Wounded Warrior Project. More than 115 employees, teammates and customers gathered together for this annual charity event. This tournament is just one of several ManTech outreach events to raise funding for the Wounded Warrior Project. Employees conducted a bake sale, raised vendor donations, and held numerous raffles at the tournament, raising $8,750 for the cause. Wounded Warrior Project provides programs and services to severely injured service members during the time between active duty and transition to civilian life.

Cycling Team Raises Thousands to Support American Diabetes Association
Nearly 24 million Americans live with diabetes. That’s about 10 percent of the nation, and the rate is as high as 27 percent for people over 65. Diabetes is the seventh-leading cause of death. ManTech’s Cycling Team is doing something about it. For the third year in a row, ManTech participated in the National Capital Region Tour de Cure for the American Diabetes Association (ADA). The team exceeded the participation and fundraising goals with 14 team members and $6,145 in donations.

ManTech Helps Fisher House Foundation Support Wounded Soldiers

The Fisher House Foundation thanked ManTech for its generous donation of $10,000. The Fisher House program is a unique private-public partnership that supports America’s military and troops. Soldiers and their families are stationed worldwide and often need to travel some distance to obtain specialized medical care; Fisher House Foundation donates "comfort homes" that allow family members to stay nearby during hospitalization for illness or injury. David Coker, president of Fisher House Foundation, said in a letter that ManTech’s donation is "even more meaningful as our thoughts and prayers are with America’s service men and women who are deployed throughout the world. The military and veterans' families, who will benefit from your thoughtfulness, join me in expressing our collective appreciation for your generosity."

CharityWorks and ManTech – A Partnership for Good

CharityWorks is a major philanthropic organization in the Washington Metropolitan area. The organization focuses its efforts on breaking the cycle of poverty through improved education, shelter, health, nutrition, and family services. It is also deeply committed to supporting organizations that serve the men and women of the armed forces and their families. ManTech employees volunteer hundreds of hours to support CharityWorks and its partners.

http://www.mantech.com/about/Pages/community_outreach.aspx

Proxy Statement (April 2014), p.46:

‘Additionally, the Audit Committee has adopted certain “standing approvals” for some common Related Party Transactions involving de minimis amounts (including certain types of compensation decisions for employees who are Related Parties because of their familial relationships and charitable contributions to entities that have relationships with Related Parties) that fall below the minimum threshold for public disclosure. The Policy requires that transactions in excess of the minimum threshold for disclosure in our proxy statement under the relevant SEC rules shall be disclosed in accordance with the applicable laws, rules, and regulations.’
A26:

Does the company provide written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda?

Score:

2

Comments:

Based on public information, there is evidence that the company provides written guidance to help Board members and employees understand and implement the firm’s ethics and anti-corruption agenda. The company provides a number of scenarios to aid understanding of the company’s Code.

References:

Public:
Standards of Ethics and Business Conduct (2014), p.1:
‘Frequently Asked Questions
Q: I worked 50 hours in the first week of a two week pay period. I am a salaried exempt employee and I recorded all of my hours for that week. I did this in case I wanted to take some time off in the second week of the pay period. But since I worked 10 hours each day in the second week I just stopped recording my hours when I hit 80 hours for the pay period. Is this okay?
A: This practice is not in compliance with ManTech timekeeping policies. Per ManTech policy FA 701 –Timesheet Accounting, you must consider the actual hours you worked and record a proration of these hours if you worked more than your standard work hours. In this example, the days that were not recorded in the second week may have allocated differently to this employee’s work projects than those that were recorded in the first week. This could result in misallocation of hours and salary to these projects. Exempt (salaried) personnel must use caution and should adopt a daily pro-ration standard to ensure that you allocate an appropriate portion of your salary costs to each of the projects that you work on during a pay period. Please be diligent when reporting your time and always ask if you have questions!’

(p.2): ‘Did You Know?’
Claiming a business meal on an expense report along with a full per diem claim for the same day could be considered fraud. A per diem reimbursement is intended to cover all of your meals and incidental expenses for a single day. Submission of an expense report claiming the business meal and a full per diem results in a double-charging problem. Doing so with the intent to defraud could result in disciplinary action, up to and including termination of your employment. You should consult ManTech policy FA 703 – Travel and Business Meal Reporting or ask your supervisor if you have questions. Expense reporting is often a direct or indirect charge to the government and should be carefully reviewed prior to submission and approval.

(p.5): ‘Frequently Asked Questions
Q: In a recent meeting, I learned that one of our business partners is in financial trouble and they’re planning a major announcement in a week or two. My parents own a lot of stock in the company, and I’m worried about their retirement funds. Can I encourage them to sell some of their stock, as long as I don’t tell them why?
A: It’s a difficult situation, but telling your parents to sell stock based on non-public information you’ve learned in confidence, even if you don’t tell them why, could be considered ‘tipping’ and could get both you and your parents in serious legal trouble. In the course of your work, you may be entrusted with non-public information. If this happens, it is essential that you not share this information outside of the ‘need to know’ circle; even when the information is not about ManTech.’

(p.6): ‘Did You Know?
A personal conflict of interest can develop if you participate in outside work activities that could influence your professional objectivity. In many cases afterhours work does not create a conflict with ManTech’s interests. However, you should review the arrangement with the Corporate Compliance Department to ensure your other work does not create a conflict. A few examples of when a personal conflict of interest likely would occur are:
• Serving on the advisory board of a competitor
• Providing outside consulting services as an extension of the work you do at ManTech
• Not disclosing a familial relationship when someone in your family is seeking to do business with ManTech and you are involved in the decision making process
• Conducting an outside business that solicits ManTech customers or employees
For additional information, you should consult ManTech policy CG 306 – Personal Conflict of Interest and discuss any questions with your supervisor or Corporate Compliance.’
A27:
Does the company have a training programme that explicitly covers anti-corruption?

Score:
0

Comments:
Based on public information, there is no readily available evidence that the company has a training programme that explicitly covers anti-corruption.

References:
Public:
NA
A28:

Is anti-corruption training provided in all countries where the company operates or has company sites?

Score:

0

Comments:

Based on public information, there is no readily available evidence that anti-corruption training is provided in all countries where the company operates or has company sites.

References:

Public:

NA
A29:
Does the company provide targeted anti-corruption training to members of the Board?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides targeted anti-corruption training to members of the Board.

References:
Public:
NA
A30:
Does the company provide tailored ethics and anti-corruption training for employees in sensitive positions?

Score:

0

Comments:
Based on public information, there is no readily available evidence that the company provides tailored ethics and anti-corruption training for employees in sensitive positions.

References:

Public:
NA
A31:
Does the company have a clear and formal process by which employees declare conflicts of interest?

Score:
2

Comments:
Based on public information, there is evidence that the company has a clear and formal process by which employees declare conflicts of interest. Employees are asked to report the conflicts of interest to their supervisor or to the Corporate Compliance Department. In particular, personal conflicts of interest are generally prohibited and any exceptions must be approved in writing by the Chief Compliance Officer.

References:
Public:
Standards of Ethics and Business Conduct (2014), p.5:
‘Personal conflicts of interest are generally prohibited and any exceptions must be approved in writing by the Chief Compliance Officer. Employees should raise potential personal conflicts of interest with their supervisor or the Corporate Compliance Department to determine if the activity is prohibited by ManTech Policy.’

(p.5): ‘Did You Know?
A personal conflict of interest can develop if you participate in outside work activities that could influence your professional objectivity. In many cases afterhours work does not create a conflict with ManTech’s interests. However, you should review the arrangement with the Corporate Compliance Department to ensure your other work does not create a conflict.’
A32:
Is the company explicit in its commitment to apply disciplinary procedures to employees, Directors and Board members found to have engaged in corrupt activities?

Score:

2

Comments:
Based on public information, there is evidence that the company will apply disciplinary procedures to employees and Directors found to have violated the Code of Conduct.

References:

Public:
Standards of Ethics and Business Conduct (2014), p.i:
‘All employees, officers and directors are expected to comply with the guidance and policies set forth in our Standards.’

(p.8): ‘ManTech’s Response to Your Concerns
All concerns that you report in good faith and with sufficient detail will be evaluated and, if necessary, investigated to determine whether a violation of our Standards has occurred. If a violation of our Standards has occurred, a report will be made to appropriate members of management. Responsive corrective and disciplinary action will be taken, up to and including termination of employment and the potential loss of security clearance. It is imperative that reporting persons not conduct their own preliminary investigations. Independent action can compromise the integrity of evidence and any subsequent investigation.’

(p.11): ‘Violations of this Financial Code of Ethics, including failure to report potential violations by others, are a serious matter that may result in significant disciplinary action, up to and including termination of employment with ManTech. If you believe a violation of this Financial Code of Ethics has occurred, you should contact the Corporate Compliance Department, the Corporate Legal Department or the Ethics Helpline. Alternatively, you may contact the Chairman of the Audit Committee of the Board of Directors through the Ethics Helpline.’
A33:
Does the company have multiple, well-publicised channels that are easily accessible and secure, to guarantee confidentiality or anonymity where requested by the employee (e.g. web, phone, in person), to report concerns or instances of suspected corrupt activity?

Score:

2

Comments:
Based on public information, there is evidence that employees can report concerns or instances of suspected corrupt activity using multiple, well-publicised channels. Employees are able to report concerns to the Corporate Compliance Department, the Audit Committee or the Ethics Helpline. The Ethics Helpline is an independent channel that allows anonymous reporting online or by phone.

References:

Public:
Standards of Ethics and Business Conduct (2014), p.8:
‘Every ManTech employee has an affirmative duty to report any actual or suspected violation of our Standards. Therefore, if you have a reasonable basis for suspecting that a ManTech employee has violated or is violating our Standards, you should promptly report your concerns to your supervisor or any ManTech manager. If appropriate, you can make your report to the Corporate Compliance Department or the Ethics Helpline directly. Pursuant to the Federal Acquisition Regulation, the Government can impose severe penalties for failure to report certain regulatory and criminal acts to appropriate Government officials. Therefore, any supervisor or manager who witnesses, discovers or receives information about a suspected or actual violation, such as timesheet fraud, false claims or other fraud matters, personal conflict of interest, bribes, gratuities or other questionable activity that could impact a Government contract, must promptly notify their management and report the matter to the Corporate Compliance Department or the Ethics Helpline. Employees with concerns about accounting, internal controls or auditing matters may also choose to contact the Audit Committee of the Board of Directors through the Ethics Helpline. Alternatively, employees may ask members of management to communicate their concerns to the Chairman of the Audit Committee of the Board of Directors. All information that you provide will be treated confidentially and ManTech will protect your identity to the maximum extent practicable. ManTech prohibits retaliation.
against any employee who makes a good faith report of a potential violation of our Standards. A list of resources, which includes Company contacts and Ethics Helpline information, is available for reporting suspected wrongdoing or obtaining clarification of our Standards in the section “Sources of Help with Resolving Your Concerns.’

(p.10): ‘Local and Group Management Contacts
Your local management and Human Resources representatives are often an excellent starting point for resolving issues and concerns. In addition, your group presidents are committed to our Standards and are available to assist you and to provide you with additional resources that address your concerns. At the group level, you may also contact your respective group compliance officers:
• Mission Solutions and Services (MSS) Bonnie Cook – (703) 814-4236
• Mission, Cyber and Intelligence Solutions (MCIS) Darla Hill – (703) 326-3494’

(p.10): ‘Ethics Helpline
ManTech has a 24 hours-aday/365-days-a-year Ethics Helpline, which you can use to report violations of our Standards or to seek guidance on our Standards. At your election, your report or question may be kept anonymous. However, providing your name may improve or expedite ManTech’s investigation of your report. To ensure the integrity of ManTech’s review process, please treat the information in your report or question as confidential. The Ethics Helpline is available by phone or internet:
By phone
In the United States or Canada:
dial toll free (866) 294-9442.
Outside the United States or Canada
Dial an international operator and request a collect call (reverse charges) be placed to (503) 352-7174. All calls will be accepted.
Online
www.mantech.ethicspoint.com
or click the Ethics Helpline link in the Ethics section on the ManTech PeopleSoft portal or Compliance intranet site.’

EthicsPoint website: ManTech
‘Attention! This web page is hosted on EthicsPoint’s secure servers and is not part of the ManTech International Corporation website or Intranet.’
A33(a):
Are the whistleblowing channels available to all employees in all geographies?

Score:
2

Comments:
Based on public information, there is evidence that across geographies, all employees have access to more than one whistleblowing channel. This includes the Ethics Helpline, as well as local and group-wide compliance and ethics officers.

References:
Public:
Standards of Ethics and Business Conduct (2014), p.8:
‘Every ManTech employee has an affirmative duty to report any actual or suspected violation of our Standards. Therefore, if you have a reasonable basis for suspecting that a ManTech employee has violated or is violating our Standards, you should promptly report your concerns to your supervisor or any ManTech manager. If appropriate, you can make your report to the Corporate Compliance Department or the Ethics Helpline directly. Pursuant to the Federal Acquisition Regulation, the Government can impose severe penalties for failure to report certain regulatory and criminal acts to appropriate Government officials. Therefore, any supervisor or manager who witnesses, discovers or receives information about a suspected or actual violation, such as timesheet fraud, false claims or other fraud matters, personal conflict of interest, bribes, gratuities or other questionable activity that could impact a Government contract, must promptly notify their management and report the matter to the Corporate Compliance Department or the Ethics Helpline. Employees with concerns about accounting, internal controls or auditing matters may also choose to contact the Audit Committee of the Board of Directors through the Ethics Helpline. Alternatively, employees may ask members of management to communicate their concerns to the Chairman of the Audit Committee of the Board of Directors. All information that you provide will be treated confidentially and ManTech will protect your identity to the maximum extent practicable. ManTech prohibits retaliation against any employee who makes a good faith report of a potential violation of our Standards. A list of resources, which includes Company contacts and Ethics Helpline information, is available for reporting suspected wrongdoing or obtaining clarification of our Standards in the section “Sources of Help with Resolving Your Concerns.’
Local and Group Management Contacts

Your local management and Human Resources representatives are often an excellent starting point for resolving issues and concerns. In addition, your group presidents are committed to our Standards and are available to assist you and to provide you with additional resources that address your concerns. At the group level, you may also contact your respective group compliance officers:

- Mission Solutions and Services (MSS) Bonnie Cook – (703) 814-4236
- Mission, Cyber and Intelligence Solutions (MCIS) Darla Hill – (703) 326-3494

Ethics Helpline

ManTech has a 24 hours-aday/365-days-a-year Ethics Helpline, which you can use to report violations of our Standards or to seek guidance on our Standards. At your election, your report or question may be kept anonymous. However, providing your name may improve or expedite ManTech’s investigation of your report. To ensure the integrity of ManTech’s review process, please treat the information in your report or question as confidential. The Ethics Helpline is available by phone or internet:

By phone

In the United States or Canada:
dial toll free (866) 294-9442.
Outside the United States or Canada
Dial an international operator and request a collect call (reverse charges) be placed to (503) 352-7174. All calls will be accepted.

Online

www.mantech.ethicspoint.com
or click the Ethics Helpline link in the Ethics section on the ManTech PeopleSoft portal or Compliance intranet site.’
A33(b):

Does the company have formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, and that whistleblowers are treated supportively?

Score:

0

Comments:

Based on public information, there is no readily available evidence that the company has formal and comprehensive mechanisms to assure itself that whistleblowing by employees is not deterred, or that whistleblowers are treated supportively.

References:

Public:
NA
A34:

Does the company have well-publicised resources available to all employees where help and advice can be sought on corruption-related issues?

Score:

2

Comments:

Based on public information, there is evidence that the company has well-publicised resources available to all employees where help and advice can be sought on corruption-related issues. Employees are able to contact a supervisor, group management contacts, group compliance officers, and the Ethics helpline. Additional guidance is available on the Ethics Programme page on the company intranet.

References:

Public:

Standards of Ethics and Business Conduct (2014), p.ii:

‘If you have questions, please speak to your supervisor or any of the other resources identified in our Standards.’

(p.9): ‘Corporate Compliance Intranet Site

Employees can obtain additional guidance and information from the Ethics Program page on the Compliance intranet site.’

(p.10): ‘Sources Of Help With Resolving Your Concerns

Local and Group Management Contacts

Your local management and Human Resources representatives are often an excellent starting point for resolving issues and concerns. In addition, your group presidents are committed to our Standards and are available to assist you and to provide you with additional resources that address your concerns. At the group level, you may also contact your respective group compliance officers:

• Mission Solutions and Services (MSS) Bonnie Cook – (703) 814-4236
• Mission, Cyber and Intelligence Solutions (MCIS) Darla Hill – (703) 326-3494

Contacts for Company-Wide Resources
The following resources are available to assist in your understanding of our Standards and reporting of issues and concerns:

Compliance Department (703) 218-6489
Terry Myers, Senior Vice President and Chief Compliance Officer (703) 218-6405
Contracts and Finance Matters
Judith Bjornaas, Senior Vice President and Deputy Chief Financial Officer (703) 218-6421
Jay Romyn, Senior Vice President and Controller (703) 218-6463
Human Resources Department (703) 218-6365
Margo Mentus, Senior Vice President of Human Resources (703) 814-4305
Information Systems Department (703) 218-6371
Dan Doody, Senior Vice President and Chief Information Officer (703) 218-8267
Legal Department (703) 218-6099
Jeffrey Brown, Executive Vice President, General Counsel and Corporate Secretary (703) 218-6098
Gaert Sime, Executive Director of Corporate Export Control (703) 218-6393
Security Department (703) 218-6368
Michael Tillison, Senior Vice President of Corporate Security (703) 218-6494

Ethics Helpline
ManTech has a 24 hours-a-day/365-days-a-year Ethics Helpline, which you can use to report violations of our Standards or to seek guidance on our Standards. At your election, your report or question may be kept anonymous. However, providing your name may improve or expedite ManTech’s investigation of your report. To ensure the integrity of ManTech’s review process, please treat the information in your report or question as confidential. The Ethics Helpline is available by phone or internet:

By phone
In the United States or Canada: dial toll free (866) 294-9442
Outside the United States or Canada
Dial an international operator and request a collect call (reverse charges) be placed to (503) 352-7174. All calls will be accepted.

Online
www.mantech.ethicspoint.com or click the Ethics Helpline link in the Ethics section on the ManTech PeopleSoft portal or Compliance intranet site.
A35:

Is there a commitment to non-retaliation for bona fide reporting of corruption?

Score:

1

Comments:

Based on public information, there is evidence that the company has a commitment to non-retaliation for bona fide reporting of corruption. The company therefore scores 1. To score higher the company would need to provide evidence that disciplinary measures are applied to employees who breach this policy.

References:

Public:
Standards of Ethics and Business Conduct (2014), p.8:
‘Every ManTech employee has an affirmative duty to report any actual or suspected violation of our Standards. Therefore, if you have a reasonable basis for suspecting that a ManTech employee has violated or is violating our Standards, you should promptly report your concerns to your supervisor or any ManTech manager. If appropriate, you can make your report to the Corporate Compliance Department or the Ethics Helpline directly. Pursuant to the Federal Acquisition Regulation, the Government can impose severe penalties for failure to report certain regulatory and criminal acts to appropriate Government officials. Therefore, any supervisor or manager who witnesses, discovers or receives information about a suspected or actual violation, such as timesheet fraud, false claims or other fraud matters, personal conflict of interest, bribes, gratuities or other questionable activity that could impact a Government contract, must promptly notify their management and report the matter to the Corporate Compliance Department or the Ethics Helpline. Employees with concerns about accounting, internal controls or auditing matters may also choose to contact the Audit Committee of the Board of Directors through the Ethics Helpline. Alternatively, employees may ask members of management to communicate their concerns to the Chairman of the Audit Committee of the Board of Directors. All information that you provide will be treated confidentially and ManTech will protect your identity to the maximum extent practicable. ManTech prohibits retaliation against any employee who makes a good faith report of a potential violation of our Standards. A list of resources, which includes Company contacts and Ethics Helpline information, is available for reporting suspected wrongdoing or obtaining clarification of
our Standards in the section “Sources of Help with Resolving Your Concerns.”
Information sources:

Company Website:
http://www.mantech.com/

ManTech Standards of Ethics and Business Conduct (2014):
http://files.shareholder.com/downloads/AMDA-NJY9O/3333853481x0x532781/0c0f6676-c78e-4836-9b2f-8ae07a3a2827/Standards_of_Ethics_2011_FINAL_revised2.pdf

ManTech Audit Committee Charter (March 2010):
http://files.shareholder.com/downloads/AMDA-NJY9O/3333853481x0x532756/a4d77637-fe2a-4a7b-a8f9-51148f91af88/Audit_Committee_Charter_-_7th_Amended_and_Restated_Final.pdf

ManTech Annual Report (2013):

ManTech Proxy Statement (April 2014):
http://files.shareholder.com/downloads/AMDA-NJY9O/3342782470x0x740792/80fc2b44-68e2-4876-9a3a-ae8362283e7c/MANT%202014%20Proxy%20Statement.pdf

Company website: Mission, Vision, Values
http://www.mantech.com/about/Pages/Mission.aspx

EthicsPoint website: ManTech

Website: WMACCA Chapter
http://www.acc.com/chapters/wmacca/index.cfm?eventID=15013
Fraud Conference website: 25th Annual AFCE Global Fraud Conference


ACFE website: Jim Butterworth


American Conference Institute’s 3rd Advanced Forum on Government Contracting: Ethics, OCI & Compliance (October, 2010):


EthicsPoint website: ManTech