

## Hotline Policy

Corporate compliance is a top priority at GenVec. The Company is committed to conducting our business with the highest level of ethics, standards, and responsibility. Our commitment toward this goal is reflected in the development of policies, described in the GenVec's Code of Business Conduct and Ethics (the "Code of Conduct"), and the implementation of the Corporate Compliance Hotline (the "Hotline").

A successful compliance program depends upon all of us being alert and committed to compliance. Employees can report serious compliance concerns anonymously and without fear of reprisal through MySafeWorkplace™. This valuable external service may be accessed by the internet [www.mysafeworkplace.com](http://www.mysafeworkplace.com) or by calling the toll free number (800-461-9330). Both of these avenues are available 24 hours a day, seven days a week. This new service is an enhancement of, not a replacement for, our current policies and procedures. Please feel free to utilize this system to report serious compliance issues if you do not feel comfortable using our current procedures.

The Hotline is intended to comply with Section 301 of the Sarbanes-Oxley Act, which mandates that the Audit Committees of public companies implement a system to allow employees to submit concerns regarding accounting and auditing matters on a confidential and anonymous basis. This system may also be used by non-employees to submit complaints regarding accounting, internal accounting controls, or auditing matters. However, employees may also use the Hotline to report other serious workplace concerns. This anonymous and confidential reporting system allows employees to report serious workplace concerns while protecting their identity. These concerns include, but are not limited to: accounting discrepancies, accounting misrepresentations, accounting omissions, violations of applicable securities laws, unfair labor practices, discrimination, harassment, sabotage, unsafe work conditions, theft, vandalism, workplace substance abuse, fraud, embezzlement, scientific misconduct, auditing matters, ethical violations, compliance and regulation violations, environmental damage and/or corporate scandals, or any other violation of the Code of Conduct. This service should not be used for less-than-serious suggestions, complaints, or concerns. These matters should be addressed

through your supervisor, department head, or Human Resources. Suggestions may be made through the online suggestion box located on the Company intranet under the Human Resource Department.

#### **A. Seeking Additional Information about the Hotline**

Questions about the Hotline or its application, particular compliance issues and their application to our company or to company employees, or any similar questions or other concerns, should be directed to your supervisor or Marge Meyer, GenVec's Corporate Compliance Officer. In addition, employees should consult the Code of Conduct for additional information on the types of compliance concerns that should be reported, the rights and responsibility of employees to report concerns, and other information relevant to reporting such concerns.

#### **B. Filing a Complaint**

The first and preferred option for reporting violations is for you to talk to your supervisor. If you do not feel comfortable discussing the matter with your supervisor or feel that he or she has not taken appropriate action, you are free to contact the Corporate Compliance Officer for confidential discussions and consultations about concerns of possible misconduct or questions about the Code of Conduct. If applicable, such employees will be counseled about appropriate procedures for reporting suspected violations of the Code of Conduct.

Alternatively, you may make a report to the Hotline. Reports of questionable accounting, internal accounting controls, or auditing matters made in this manner will be directed to a designated member of GenVec's Audit Committee, who serves as an Independent Director and has the authority to work directly with legal counsel. Reports relating to environmental or safety concerns will be directed to the Safety Officer; those involving HR or other concerns will be directed to the Corporate Compliance Officer. If your complaint involves misconduct on the part of the Corporate Compliance or Safety Officer, MySafeWorkplace™ will automatically divert your concern to an alternate individual.

Your confidential report will instantly and anonymously be forwarded to the appropriate individuals within our organization. Upon submission of your report, you will be provided with a unique access code and asked to generate a personal password. The access code and password will enable you to anonymously re-enter the site at any time. You will then be able to send and receive anonymous messages pertaining to your report and if desired, participate in any follow-up. It is very important that you document these items as they will be used to follow up on your report.

Note that while you can remain anonymous, you will have the option of providing your contact information to MySafeWorkplace™. If provided, this information will not be forwarded to GenVec for any reason.

### **C. Checking the Status of a Complaint.**

You may check the status of your complaint by accessing the MySafeWorkplace™ through the internet or by calling the toll free number. Once the unique access code and password is entered, you may check the status of a complaint, or initiate/continue an anonymous dialogue with GenVec through the message board entitled “Talk to Your Organization.”

### **D. Processing a Complaint**

Once a complaint has been filed either by the online method or by the toll-free number, MySafeWorkplace™ will immediately send an email alert to the designated recipient indicating that a complaint has been filed. This alert will be sent to the recipient automatically every 24 hours until the incident and/or message has been reviewed. The recipient must access the hyperlink and review the information in order to stop the email alerts. The MySafeWorkplace™ message board can be used for anonymous communications between the employee and the recipient while the concerns are being addressed.