

UN GUIDING PRINCIPLES (UNGP) REPORTING FRAMEWORK INDEX

Booz Allen has applied the [UN Guiding Principles Reporting Framework](#) in preparing its 2022 Environmental, Social, Governance (ESG) Report (“[2022 ESG Report](#)”) and the index below. The [UN Guiding Principles Reporting Framework](#) is a comprehensive guide for companies to report on human rights issues in line with their responsibility to respect human rights. This responsibility is outlined in the global standard, [UN Guiding Principles on Business and Human Rights](#). Booz Allen strives to align with the UN Guiding Principles, as indicated through the index below and as may be supplemented on our corporate website at www.boozallen.com.

GOVERNANCE OF RESPECT FOR HUMAN RIGHTS

POLICY COMMITMENT

A1. What does the company say publicly about its commitment to respect human rights?

[2022 ESG Report](#); Corporate Governance, Human Rights (Page 48)
[Code of Business Ethics & Conduct](#) (Page 40)

We are Committed to Upholding Human Rights:

We honor and celebrate human rights. We condemn human trafficking and slavery, forced labor, or child labor, and do not engage in these activities within the firm or tolerate them in our supply chain.

Human rights are the most fundamental rights that we have and are at the heart of our Purpose and Values. We join the global community in promoting and protecting human rights and acting to stop actions that infringe on these rights. We support the United Nations Guiding Principles on Business and Human Rights.

Our robust global policies, procedures, programs, and practices reflect our strong commitment to human rights, corporate citizenship, and fair labor conditions, with a focus on those human rights that are most relevant to our business.

Booz Allen demonstrates its commitment to upholding human rights through policies that:

- Support and promote our employee’s well-being
- Create a diverse and inclusive work environment that is free of harassment, discrimination, and retaliation
- Promote fair competition
- Engage in sustainable procurement, including no use of conflict minerals
- Take actions to identify and detect human rights violations in our supply chains through risk-based due diligence
- Undertake only compliant human subject research
- Protect the environment and support our communities

We Are Deeply Committed to Fair and Equitable Treatment of our People:

We respect our employees’ rights to discuss and agree to terms and conditions of employment without coercion and to freely terminate their employment. We ensure that our employees are of legal working age for their position and have a safe, healthy, and respectful workplace. We are committed to diversity, equity, and inclusion, and to the availability of benefits, health coverage, and natural disaster relief for our people.

We Comply With International Trade Regulations:

We comply with international trade regulations that prohibit business with certain countries, organizations, or individuals, and that require government authorization for cross-border activities involving sensitive items or technologies.

International trade regulations protect global security and stability. These laws ensure that sensitive or potentially dangerous products or technologies are not used to support proliferation, terrorism, violations of human rights, or other activities that jeopardize the safety of civilian populations around the world. Our compliance with these laws is not only mandatory but critical in our role as a U.S. government contractor.

We do not do business in countries that are subject to comprehensive sanctions programs. We screen our business partners, employee candidates, and other third parties against government watchlists to ensure we do not hire or do business with the parties on those lists.

See also:

Booz Allen [Policies and Commitments](#), including those on: Anticorruption and Anti-Bribery; Combatting Trafficking in Persons; Compliance with International Trade Regulations; Data Privacy; Equal Employment Opportunity and Affirmative Action; Gifts and Business Courtesies; Mandatory Reporting and Non-Retaliation; Preventing Money Laundering and Terrorist Financing; Procurement of Products and Services; Recruiting and Hiring; Research Compliance; Working With Ethical Business Intermediaries; Workplace and Sexual Harassment; and Workplace Health, Safety, Security and Access. Additionally, our Commitment to Sourcing Conflict Minerals Responsibly; Supplier Code of Conduct; and Total Rewards Program.

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EMBEDDING RESPECT FOR HUMAN RIGHTS

<p>A2. How does the company demonstrate the importance it attaches to the implementation of its human rights commitment?</p>	<p>See our 2022 ESG Report for discussion of our Board of Directors' role with respect to ESG matters (page 44); integration of ESG performance, including metrics related to diversity, equity, and inclusion, into our senior executives' incentive compensation (page 14); pay practices and pay equity (page 23); environmental health & safety (page 25); ethics & compliance programs, including third-party risk management (pages 45-46); and our overarching approach to human rights (page 48).</p> <p>Employees are made aware of their responsibilities related to human rights through mandatory annual training through our Ethics and Compliance Program and the reflection of such responsibility throughout our Code of Business Ethics & Conduct and numerous other corporate policies as referenced above in A1.</p> <p>We make clear our expectations related to human rights and standards for subcontractors and suppliers through our Supplier Code of Conduct.</p>
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DEFINING A FOCUS OF REPORTING

<p>B1. Statement of salient issues: State the salient human rights issues associated with the company's activities and business relationships during the reporting period</p>	<p>2022 ESG Report; Corporate Governance, Human Rights (Page 48) 2022 ESG Report; Corporate Governance, Ethics & Compliance (Pages 45-46)</p> <p>See also:</p> <ul style="list-style-type: none"> • Code of Business Ethics & Conduct
<p>B2. Determination of salient issues: Describe how the salient human rights issues were determined, including any input from stakeholders.</p>	<p>2022 ESG Report; Approach to ESG, Managing ESG Topics (Page 9) 2022 ESG Report; Approach to ESG, Materiality (Page 10) 2022 ESG Report; Approach to ESG, Our ESG Strategy (Page 11) 2022 ESG Report; Corporate Governance, Human Rights (Page 48)</p>
<p>B3. Choice of focal geographics: If reporting on the salient human rights issues focuses on particular geographies, explain how that choice was made.</p>	<p>N/A</p>
<p>B4. Additional severe impacts: Identify any severe impacts on human rights that occurred or were still being addressed during the reporting period, but which fall outside of the salient human rights issues and explain how they have been addressed.</p>	<p>N/A</p>

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MANAGEMENT OF SALIENT HUMAN RIGHTS ISSUES

SPECIFIC POLICIES

- C1. Does the company have any specific policies that address its salient human rights issues and, if so, what are they?**
- [2022 ESG Report](#); Empower Diverse Talent (Pages 12-27)
 - [2022 ESG Report](#); Drive Community Resilience, Cybersecurity and Data Privacy (Pages 39-40)
 - [2022 ESG Report](#); Corporate Governance, Ethics & Compliance (Pages 45-46)
 - [2022 ESG Report](#); Corporate Governance, Supply Chain Management (Page 47)
 - [2022 ESG Report](#); Corporate Governance, Human Rights (Page 48)
- See also:
- [Code of Business Ethics & Conduct](#)
 - [Anticorruption and Anti-Bribery Policy](#)
 - [Data Privacy Policy](#)
 - [Equal Employment Opportunity and Affirmative Action Policy](#)
 - [Gifts and Business Courtesies Policy](#)
 - [Mandatory Reporting and Non-Retaliation Policy](#)
 - [Total Rewards Program](#)
 - [Working with Ethical Business Intermediaries Policy](#)
 - [Workplace and Sexual Harassment Policy](#)
 - [Workplace Health, Safety, Security, and Access Policy](#)
 - [Supplier Code of Conduct](#)

STAKEHOLDER ENGAGEMENT

- C2. What is the company’s approach to engagement with stakeholders in relation to each salient human rights issue?**
- [2022 ESG Report](#); Approach to ESG, Managing ESG Topics (Page 9)
 - [2022 ESG Report](#); Approach to ESG, Materiality (Page 10)
 - [2022 ESG Report](#); Approach to ESG, Our ESG Strategy (Page 11)
 - [2022 ESG Report](#); Approach to ESG, Board of Directors (Page 44)
 - [2022 ESG Report](#); Corporate Governance, Ethics & Compliance (Pages 45-46)
 - [2022 ESG Report](#); Corporate Governance, Enterprise Risk Management (Page 47)
 - [2022 ESG Report](#); Corporate Governance, Supply Chain Management (Page 47)
 - [2022 ESG Report](#); Corporate Governance, Human Rights (Page 48)
- C3. How does the company identify any changes in the nature of each salient human rights issue over time?**
- [2022 ESG Report](#); Approach to ESG, Materiality (Page 10)
 - [2022 ESG Report](#); Corporate Governance, Ethics & Compliance (Pages 45-46)
 - [2022 ESG Report](#); Corporate Governance, Enterprise Risk Management (Page 47)
 - [2022 ESG Report](#); Corporate Governance, Human Rights (Page 48)
- See also:
- [Risk Matrix Policy](#)
 - [Ethics & Compliance Program](#)

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STAKEHOLDER ENGAGEMENT (continued)

C4. How does the company integrate its findings about each salient human rights issue into its decision-making processes and actions?	<p>2022 ESG Report; Approach to ESG, Managing ESG Topics (Page 9) 2022 ESG Report; Approach to ESG, Materiality (Page 10) 2022 ESG Report; Approach to ESG, Our ESG Strategy (Page 11) 2022 ESG Report; Approach to ESG, Board of Directors (Page 44) 2022 ESG Report; Corporate Governance, Ethics & Compliance (Pages 45-46) 2022 ESG Report; Corporate Governance, Enterprise Risk Management (Page 47) 2022 ESG Report; Corporate Governance, Human Rights (Page 48)</p> <p>See also:</p> <ul style="list-style-type: none">• Risk Matrix Policy• Ethics & Compliance Program
C5. How does the company know if its efforts to address each salient human rights issues are effective in practice?	<p>2022 ESG Report; Approach to ESG, Managing ESG Topics (Page 9) 2022 ESG Report; Approach to ESG, Board of Directors (Page 44) 2022 ESG Report; Corporate Governance, Ethics & Compliance (Pages 45-46) 2022 ESG Report; Corporate Governance, Enterprise Risk Management (Page 47) 2022 ESG Report; Corporate Governance, Human Rights (Page 48)</p> <p>See also:</p> <ul style="list-style-type: none">• Risk Matrix Policy• Ethics & Compliance Program
C6. How does the company enable effective remedy if people are harmed by its actions or decisions in relation to the salient human rights issues?	<p>2022 ESG Report; Corporate Governance, Ethics & Compliance (Pages 45-46)</p> <p>See also:</p> <ul style="list-style-type: none">• Code of Business Ethics & Conduct• Risk Matrix Policy• Mandatory Reporting and Non-Retaliation Policy• Ethics & Compliance Program