

THE CODE

Living Our Values: The Booz Allen Hamilton Code of Business Ethics and Conduct



Table of Contents

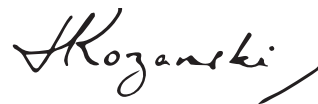
| | | | |
|---|----|---|----|
| Message from Our CEO | 03 | We Choose Our Suppliers and Other Business Partners Responsibly | 22 |
| Our Purpose & Values | 04 | We Respect U.S. Government Employment Restrictions | 23 |
| Our Values | | We Comply With International Trade Regulations | 24 |
| We Live Our Values Every Day | 06 | We Operate Our Business with Integrity | |
| Our Actions Reflect Our Values | 07 | We Accurately Report Time and Expenses | 26 |
| We Speak Up and Do Not Tolerate Retaliation | 08 | We Avoid Organizational and Personal Conflicts of Interest | 27 |
| We Lead by Example | | We Keep and Maintain Accurate Records | 29 |
| We Lead by Example | 12 | We Protect and Use Assets Responsibly | 30 |
| We Care About Our People | | We Protect Booz Allen, Client, and Third-Party Information | 32 |
| We Embrace Diversity, Equity, and Inclusion | 14 | We Protect Booz Allen's Image and Reputation | 34 |
| We Maintain a Safe and Respectful Workplace | 15 | We Do Not Engage in Insider Trading or Tipping | 36 |
| We Protect the Information of Booz Allen People | 16 | We Cooperate with Investigations | 38 |
| We Conduct Business with Integrity | | We Value Our Role as a Good Corporate Citizen | |
| We Compete for Business Fairly | 18 | We Are Committed to Upholding Human Rights | 40 |
| We Do Not Offer or Pay Bribes or Engage in Corrupt Activities | 19 | We Respect the Political Process | 41 |
| We Are Responsible with Gifts and Business Courtesies | 21 | We Engage in Our Communities for Social Good | 42 |
| | | We Are Committed to Environmental Sustainability | 43 |

MESSAGE FROM OUR CEO

Our shared purpose and values form the foundation for everything else at Booz Allen—our approach to business, our service to clients and support to communities, and our interaction with each other. The people of our firm understand the direct link between Booz Allen’s long-standing success and our unwavering commitment to living our purpose and values each day.

This Code of Conduct is an important guide on a variety of topics - from managing teams and fostering a healthy, welcoming and respectful workplace to protecting information, keeping accurate records, and avoiding conflicts of interest. It applies to every employee, emphasizes what is expected of each of us, and describes how we meet those expectations. It also empowers all of us to speak up if we see something inconsistent with our ethics or values. We take every report seriously and strictly prohibit retaliation against anyone who raises concerns in good faith.

Thank you for your ongoing commitment to doing what is right. It takes each one of us to build a culture of integrity. Together, we can continue to demonstrate what it means to Be Booz Allen today and well into the future.



Horacio D. Rozanski
President and Chief Executive Officer

OUR PURPOSE & VALUES

We Empower People to Change the World

FEROCIOUS INTEGRITY

Do right
Hold yourself and each other accountable

PASSIONATE SERVICE

Embrace the mission
Listen and act with empathy
Make meaningful connections
Build community through generosity

CHAMPION'S HEART

Crave being the best
Bring joy in the pursuit
Learn from failure
Compete with passion

COLLECTIVE INGENUITY

Find the problem and solve it
Be resourceful and creative
Seek to make the biggest difference
Harness the power of diversity
Be devoted to the team

UNFLINCHING COURAGE

Speak truth to power
Maintain convictions, especially under stress
Bring bold thinking

WHAT'S YOUR STORY

These values are reflected in our stories. Share your story and show us what it means to *Be Booz Allen*.
Share your story through Engage at engage.bah.com and find more ways to get loud and proud about our values at purposeandvalues.bah.com.



OUR VALUES

We Live Our Values Every Day

Our success comes from living our values every day. Our values reflect both who we are and who we aspire to be, collectively and individually.

This focus on values, operating with integrity, and always complying with the law helps us to attract and retain top talent, provide outstanding service to our clients, and deliver upon our commitment to always doing the right thing.

The Code represents our values in action and serves as a guide for all Booz Allen people (including our employees, corporate officers, Board members, contractors, consultants, and others working on our behalf) on how they should operate on behalf of the firm, day in and day out.

As Booz Allen employees, we each have a responsibility to:

- Know and live by our Values and the Code
- Think before we speak and act
- Adhere to our policies and the law
- Ask for help when we need it
- Speak up whenever we have questions or concerns about our business or business practices

In addition to the expectations set forth above, we expect our Career Managers and Job Leaders to:

- Serve as role models for living our Values and complying with the Code
- Talk with their teams about the importance of operating with integrity in all that we do
- Be responsive and foster an environment where employees feel comfortable and safe speaking up
- Escalate questions and concerns when necessary to ensure they are properly addressed

Our Actions Reflect Our Values

Our values should always guide our behavior to ensure we do what's right.

However, we know that the “right path” is not always easy to see, so if you find yourself in a situation where you're not sure what to do, ask yourself the following questions to help guide your conduct:

- ✔ Would the actions I am considering be consistent with our values?
- ✔ Would my actions comply with the Code and our policies?
- ✔ Would my actions benefit the firm—not just a certain individual or group?
- ✔ Would I be comfortable if my actions were made public?

If you can answer “yes” to each of these questions, the action is probably okay. If you answered “no,” “maybe,” or “I'm not sure” to any of these questions, stop and ask for guidance before proceeding—you do not have to face a difficult situation alone.

We have many resources available to assist you when you have questions or concerns. You should always feel comfortable reaching out to any of the following resources for assistance:

- ✔ Your Job Leader, Career Manager, or any senior leader
- ✔ **An Ethics Advisor**
- ✔ **The Ethics & Compliance Team**
- ✔ **The Legal Department**
- ✔ **Employee Relations**
- ✔ **The Ethics HelpLine** (option to remain anonymous)

We Speak Up and Do Not Tolerate Retaliation

Every Booz Allen employee plays an important role in reinforcing our culture of integrity.

As a Booz Allen employee, it is your duty to raise issues and concerns promptly. Some of the concerns we require you to promptly report are situations where you think or have reason to believe that:

- The law, our Code, or a firm policy has been violated
- Someone's health or safety is at risk
- There is undue risk (including financial, reputational, and legal risk) to our firm, or
- The security of sensitive firm information, or a third party's sensitive or classified information entrusted to us, may be compromised

By reporting possible misconduct, we all help contribute to our firm's culture of integrity.

The firm does not tolerate retaliation against anyone for raising a good-faith ethical or legal concern, or for cooperating with an investigation. Anyone who violates our non-retaliation policy is subject to disciplinary action, up to and including termination of employment.



What can retaliation look like?

Retaliation occurs when an employee is subject to adverse action because he or she engaged in a protected activity, including raising a concern.

Retaliation can take many forms, including:

- Demotion
- Firing
- Negative performance assessments
- Reduced salary
- Job reassignment
- Exclusion from meetings
- Threats or harassment

If you believe you have been retaliated against for raising a concern or participating in an investigation, you should immediately report your concerns through any one of the firm's reporting channels so the concern can be promptly investigated.

When concerns are reported promptly, the firm is best positioned to investigate the situation and fix any potential problems.

Here's what happens when you report a concern through the Ethics HelpLine:

- ✔ You may choose to remain anonymous.
- ✔ If you choose to report anonymously, you will receive a case number so you can continue to follow up on the status of your concern.
- ✔ If you do choose to provide your name, the firm will keep your identity confidential to the greatest extent possible while conducting a thorough investigation.
- ✔ We will provide as much information to the reporter as possible, while respecting the confidentiality of the investigation and disciplinary action process.



Know Where to Go for Help

The following reporting channels are available to ask your question or raise your concern:



- ✓ Your Career Manager, Job Leader, or any senior leader
- ✓ An **Ethics Advisor**
- ✓ Any member of the Ethics & Compliance Team (ethics@bah.com)
- ✓ Human Resources (HR) via the **Help Desk**
- ✓ Any member of the **Legal Department**
- ✓ The **Chief Ethics and Compliance Officer**



For security related questions or concerns contact:

- ✓ Cyber Incident Response Team (CIRT) (cirt@bah.com or 703-984-1933) for observed or suspected information security incidents
- ✓ Security Services (security_services@bah.com) for security or safety concerns



- ✓ Our Ethics Helpline at 800-501-8755 (U.S.) or international, +1-888-475-0009, or <http://speakup.bah.com>.
Concerns may be raised anonymously.

ADDITIONAL RESOURCES

Cooperating with Investigations and Making External Disclosures Policy

Mandatory Reporting and Non-Retaliation Policy

Equal Employment Opportunity and Affirmative Action Policy





WE LEAD BY EXAMPLE

We Lead by Example

WHAT

When it comes to our values and our culture of integrity, we hold our leaders to a higher standard. We require our leaders to serve as role models for living our values every day.

WHY

The words and conduct of our leaders set the tone for the organization.

HOW

By acting with integrity in all that they do, reinforcing and promoting our values, and inspiring others to embrace our Code, our leaders help reinforce the importance of our values in our day-to-day business.

As leaders, we must create a workplace where employees feel comfortable coming forward with questions and concerns, and we must support employees who speak up. We never retaliate against employees for raising legal or ethical concerns in good faith.

QUESTION:

What should I do if I learn of a concern about an employee in my management chain?



ANSWER:

It depends. If the matter is performance-related, you are empowered to address the concern as a manager. However, if the concern suggests the employee may have violated the Code or a firm policy, you must escalate the matter through a firm reporting channel. If you are unsure of how to handle the concern, use a firm resource like the People Services team or an Ethics Advisor for guidance.



If your role involves leading or managing people, we expect you to:

- **Talk about the Code and our Values:** Read the Code and make ethics conversations a regular part of your routine.
- **Reward integrity:** Recognize and reward employees for doing the right thing.
- **Be Accountable for Training:** Ensure your team completes mandatory training on time, every time.
- **Know What You Don't Know:** Know where to go for answers when you or your employees have questions that you can't solve on your own.



WE CARE ABOUT OUR PEOPLE

We Embrace Diversity, Equity, and Inclusion

WHAT

We are an inclusive organization that values people with diverse backgrounds and experiences.

WHY

Our inclusive workplace cultivates success because it enables us to solve complex problems, enhances our competitive advantage, and fosters employee engagement and belonging.

HOW

We hire, compensate, and promote employees based on their skills, performance, and achievements, and we provide everyone with an equal chance to succeed. We are open to diverse ideas that enable all of us to contribute our best work based on our abilities.

We embrace diversity and do not discriminate based on any person's race, color, gender, national origin, religion, sexual orientation, veteran status, disability, marital status, age, gender identity and expression, genetic information, or any other legally protected category.

Booz Allen also participates in certain programs that are designed to advance the principles of equal employment opportunity in the recruitment, advancement, and compensation of qualified women, minorities, individuals with disabilities, and veterans.

ADDITIONAL RESOURCES

[Equal Employment Opportunity and Affirmative Action Policy](#)

[Recruiting, Hiring, and Employee Referral Policy](#)

[Performance Management Policy](#)

[DEI Navigator: Learning Resources for Diversity, Equity, and Inclusion](#)



At Booz Allen, we all play a part in advancing our Diversity, Equity, and Inclusion mission by:

- Speaking up and sharing ideas, experiences, and opinions
- Listening with patience and empathy and creating an environment where open dialog thrives
- Asking questions, respecting answers, and being open to new perspectives
- Appreciating the unique contributions of others



We Maintain a Safe and Respectful Workplace

WHAT

We maintain and expect a safe and productive workplace where colleagues treat each other, and those with whom they interact with, with respect.

WHY

Everyone deserves a work environment that is safe, secure, and free from inappropriate conduct. This enables us to produce our best work.

HOW

We put our employees' safety first. We maintain thorough safety and health practices across our operations and comply with workplace safety regulations. We do not tolerate—and we take appropriate action against—any inappropriate behavior including but not limited to discrimination, retaliation, intimidation, humiliation, bullying, harassment, violence, or threatening behavior toward colleagues, applicants, clients, or business partners.

We are committed to a workplace that is free of illegal drugs, including marijuana, and the abuse of legal drugs and alcohol.

QUESTION:

One of our clients has been making inappropriate jokes during meetings and making team members feel uncomfortable. Do we still report this even if it's not a concern about an employee?



ANSWER:

Yes. We want to know about any situation in which an employee feels uncomfortable. We do not tolerate any form of harassment initiated by (or directed at) an employee, client, or third-party with whom we do business.



ADDITIONAL RESOURCES

Workplace and Sexual Harassment Policy
Workplace Health, Safety, Security, and Access Policy

Use of Drugs and Alcohol Policy
Discipline for Misconduct Policy



Employee Assistance Program

Our Employee Assistance Program (EAP) offers you and your family confidential emotional counseling and other services. Visit [BeSupported](#) or read our [FAQs for U.S. employees](#) to learn more. International employees can find additional information at [Be Supported EAP International](#).

We Protect the Information of Booz Allen People

WHAT

We safeguard the personal, medical, and financial information of Booz Allen people.

WHY

We have a legal and ethical responsibility to protect this information.

HOW

We follow all applicable laws and company policies, procedures, and controls that carefully govern how we handle our current, former, and prospective employees' information. We only use or disclose such information for lawful, legitimate business purposes.



Remember:

Having access to sensitive employee information to perform your job duties for Booz Allen does not mean you may use or disclose it outside of the performance of those duties.



ADDITIONAL RESOURCES

- Data Privacy Policy
- Employee Privacy Notice
- Employment and Dependent Benefit and Verification Policy





WE CONDUCT BUSINESS WITH INTEGRITY

We Compete for Business Fairly

WHAT

We compete fiercely but fairly with the end goal of winning business and serving our clients based upon the strength of our services and solutions.

WHY

Competing fairly and with integrity allows us to continue our long-standing history of ensuring our clients receive the best services and solutions to meet their needs.

HOW

We provide truthful and accurate information, including any marketing and pricing data, to our clients or prospective clients. We only use, accept, or receive information that is obtained legitimately, and only for the purposes for which it is given. We comply with all applicable procurement integrity rules when bidding on U.S. government contracts, as well as any similar laws in other places around the world where we do business. We do not enter into any agreements that would violate the law, our Code, or our policies.

We never

- Make arrangements with our competitors to unfairly restrain trade.
- Access or use information, such as source selection information or third-party proprietary information, other than for the purpose for which it is provided.
- Exchange proprietary information or make verbal or written agreements that violate the law or that are otherwise anti-competitive.
- Use non-public information obtained by our employees in their prior employment.

We always

- Only gather publicly available information about our competitors.
- Seek to avoid conflicts of interest or the appearance of such conflicts.
- Support fair competition among suppliers when we procure goods and services.
- Maintain the confidentiality of third-party proprietary information or government-sensitive information entrusted to us and use it only for the purposes for which it was given.
- Immediately report the receipt, or inadvertent receipt, of any non-public government information or competitor proprietary information that we are not entitled to use.

QUESTION:

A new employee just joined our team. He previously worked for the incumbent on a project that will be up for re-compete soon. Before we decide whether to pursue it, we want to ensure we would be price-competitive. Can I ask him general questions about their project costing methodology if I do not get into “hard facts”?



ANSWER:

Unless the costing methodology is publicly available, you cannot. Even at a summary level, this would be proprietary information that could give us an unfair advantage and may violate the new employee’s duties to his prior employer.



ADDITIONAL RESOURCES

Procurement Integrity and Competing Fairly Policy

Procurement of Products and Services Policy

We Do Not Offer or Pay Bribes or Engage in Corrupt Activities

WHAT

We do not offer or pay bribes, give or accept kickbacks, or make facilitation payments.

WHY

Bribery, including even the attempt to bribe, is illegal under U.S. law and the law of other places where Booz Allen does business. Even the perception of corruption could cause significant reputational and legal damage to our business, in addition to significant financial penalties and possible debarment.

HOW

We comply with anti-bribery and anti-corruption laws wherever we do business, regardless of what local laws may permit.

A bribe can be something other than cash.

A gift, a favor, even an offer of a loan or a job—anything of value—could be considered a bribe if it's offered to improperly influence another party. We can also be held responsible for bribes paid by third parties working for or with us.

As a Booz Allen employee, it's your responsibility to understand what is allowed under our policies and ask for guidance when you need it.



Be Aware of Hidden Bribery Risks



It may sound simple to identify circumstances where there's a risk of paying a bribe. But bribes can take many forms. Consider the following:

- **Working with third-parties:** Set clear expectations and actively monitor the work of third-parties doing business on our behalf. Remember that we could be responsible for their actions.
- **Hiring job candidates:** We hire candidates based on their experience, qualifications, and business need—never as a favor or reward.
- **Making charitable contributions:** We only make charitable contributions or sponsorships based on legitimate business purposes—never as a favor or reward to benefit an individual.

Bribe: We prohibit paying or offering bribes. A Bribe is an improper attempt to gain favorable treatment from an organization (like a government agency or client) by directly or indirectly giving or offering money, gifts, or anything else of value to anyone within that organization in exchange for that business advantage. Bribes are prohibited regardless of whether they are paid to government officials (public-sector bribery) or people affiliated with private-sector companies or organizations (commercial bribery).

Kickback: We prohibit paying or offering kickbacks. A Kickback is an improper attempt to obtain or reward favorable treatment by a prime contractor or a subcontractor related to a U.S. government contract by directly or indirectly paying or offering any money, gift, or anything else of value to the company or its employees in exchange for that favorable treatment.

Facilitation Payment: We prohibit paying or offering facilitation payments. A Facilitation Payment is a small payment made to a government official to speed up routine government actions necessary to deliver benefits Booz Allen is entitled to—like processing paperwork, delivering mail, installing phones, or turning the power on.

ADDITIONAL RESOURCES

Gifts and Business Courtesies,
Community Impact, and
Sponsorship Payments Policy

Anticorruption and Anti-Bribery Policy

Working with Ethical Business
Intermediaries Policy

Recruiting, Hiring and Employee
Referral Policy



We Are Responsible with Gifts and Business Courtesies

WHAT

We value the relationships we've built with our clients, suppliers, and other business partners and must ensure that these relationships remain positive and ethical. We ensure these relationships are never influenced by offers of inappropriate gifts or business courtesies.

WHY

When people exchange gifts, meals, or other business courtesies, it can create the perception that the giver is trying to improperly influence business decisions. In addition, many of our stakeholders are subject to stringent regulations and policies that set rules for what they can offer or accept.

HOW

We compete on the strengths of our products and services and do not give gifts or business courtesies to gain an unfair competitive advantage.

We always follow Booz Allen's and the third party's guidelines to identify the circumstances under which an offer or acceptance is okay—and when it's not.

We follow our policies, which outline pre-approval thresholds and articulate special restrictions that may prohibit gifts and business courtesies in certain circumstances. For example, we have different rules for commercial and government business. If our business partners have more restrictive rules on what they can give or accept, we follow those rules in our interactions with them.

ADDITIONAL RESOURCES

Gifts and Business Courtesies, Community Impact, and Sponsorship Payments Policy

Individual Conflicts of Interest Policy



Keys to Responsibly Giving and Receiving Business Courtesies

Sometimes knowing what you can give or accept from a client or supplier can be confusing. Keep these key concepts in mind when considering giving gifts or business courtesies:

Who: Different rules apply in different situations. Make sure the gift is permitted by law and is in accordance with the policies of both the giver and receiver.

What: Gifts must be reasonable, given infrequently, and should never be cash or cash equivalents (like “use anywhere” gift cards). You should always ensure that the gift or business courtesy satisfies a reasonable business purpose and that the gift is not for the purpose of seeking favorable treatment or influencing decision-making.

Refer to the Gifts and Business Courtesies and Sponsorship Payments Policy, or contact ethics@bah.com if you have questions.

We Choose Our Suppliers and Other Business Partners Responsibly

WHAT

We engage with suppliers and other business partners who commit to operating in a manner consistent with our values and in compliance with the law.

WHY

By partnering with organizations that share our values, we help ensure that Booz Allen lives its value of ferocious integrity every day, and we reduce the possibility of legal issues and reputational harm to the firm.

HOW

We choose our business partners and make procurement decisions objectively, based on factors such as quality, service, price, availability, and reliability. We strive to partner with organizations who share our commitment to diversity, integrity and sustainability.

We conduct appropriate, risk-based due diligence of potential business partners and follow firm procedures when engaging third parties.

We communicate our expectations through tailored contractual provisions, including, where appropriate, a commitment to comply with our Supplier Code of Conduct. We raise our concerns through the appropriate channels if the actions of a third-party do not adhere to our values or create undue risk for the firm.

ADDITIONAL RESOURCES

[Working with Ethical Business Intermediaries Policy](#)

[Procurement of Products and Services Policy](#)

[Risk Matrix Policy](#)

[Signature Matrix Policy](#)



We Respect U.S. Government Employment Restrictions

WHAT

We follow all applicable laws and restrictions when engaging current and former U.S. government employees for hire and when staffing current Booz Allen employees who were previously employed by the U.S. government.

WHY

As a U.S. government contractor, we are required to comply with these laws and restrictions. In addition, doing so promotes transparency and avoids creating conflicts of interest for the firm.

HOW

We do not engage current U.S. government employees in employment discussions until a firm recruiter has verified that they have disqualified themselves from decisions directly impacting Booz Allen. We follow specific steps set forth in the firm's policy on hiring current U.S. government employees and staffing current employees with post-government employment restrictions.



- There may be restrictions on the roles and responsibilities that a former government employee may perform for Booz Allen.
- Certain U.S. government employees must obtain written guidance on their restrictions from a designated agency ethics official (e.g., DAEO letter) prior to hire.
- These rules can be complex, so be sure to connect with Recruiting or Ethics & Compliance for additional guidance.



ADDITIONAL RESOURCES

- Post-Government Employment Policy
- Organizational Conflicts of Interest Policy

We Comply With International Trade Regulations

WHAT

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.

WHY

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.

HOW

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.

We monitor the firm’s acquisition and development of technology to understand the specific export controls that apply. We do not engage in cross-border activities that involve export-controlled technologies such as defense and intelligence, information security, or other technologies with critical military or intelligence applications unless we have the appropriate government authorization.

We do not cooperate with any boycott that is not U.S. government-sanctioned, including the Arab League boycott against Israel. We do not agree to any request by a client or third party for information about our business activities related to Israel, or any attempt to require Booz Allen to refuse to do business with anyone because of any boycott against Israel. We also report these requests to the U.S. government.

ADDITIONAL RESOURCES

[Compliance with International Trade Regulations Policy](#)



- Identify any international activities in your opportunities and contracts so they can be reviewed for trade compliance risk
- Seek approval for all international transfers of Booz Allen equipment, even when you’re taking your devices on vacation
- Secure sensitive information uploaded to Booz Allen networks to prevent unauthorized access
- Keep sensitive items and information in an Export-Restricted or Cleared facility

Reach out to the **International Trade Compliance (ITC) team** with any questions about international trade compliance requirements.





WE OPERATE OUR BUSINESS WITH INTEGRITY

We Accurately Report Time and Expenses

| | | |
|--|---|---|
| WHAT We accurately record our time and only incur and charge actual and reasonable expenses for necessary business purposes. | WHY Accurate time and expense reporting is required for us to properly account for our time and expenses, invoice our clients, and recognize revenue. | HOW We follow our firm's policy on time reporting, including accurately recording time spent on work activities using the appropriate charge code, submitting time reports on schedule, and requiring verification by managers of the accuracy of reports before approving them. In addition, we follow our firm's policy on expense reporting, including accurately reporting and documenting our business expenses. |
|--|---|---|

QUESTION:

My manager directed me to charge the client fewer hours than I worked. Is this okay?



ANSWER:

No. All time spent on work activities must be recorded and charged accurately. If you feel uncomfortable with the direction you've received from a manager, reach out through a firm reporting channel to discuss your situation.

QUESTION:

My manager has been submitting receipts for reimbursement that I don't believe have any business justification. What should I do? I'm certain my manager will know it's me if I say something.

ANSWER:

You should report your concern. It's always difficult when you suspect a manager might be violating a policy. The firm has many reporting channels to raise concerns; pick the one you feel most comfortable with so the firm can conduct a proper investigation. If you suspect you are being retaliated against because you raised your concerns, report those concerns immediately so the firm can help you navigate the situation and ensure compliance with our non-retaliation policy.



ADDITIONAL RESOURCES

[Time Reporting and Staff Alignment Policy](#)

[Travel and Expense Reimbursement Policy](#)

We Avoid Organizational and Personal Conflicts of Interest

WHAT

We don't allow personal interests to affect business decisions made on behalf of Booz Allen. We never use corporate property, information, or our position with Booz Allen for personal opportunity or gain, or to compete with the firm.

WHY

When making decisions related to Booz Allen, we have a duty to act in the firm's best interests and avoid even the appearance of a conflict.

HOW

When we find ourselves in situations that either intersect with or impact Booz Allen business or our ability to perform our jobs objectively, we promptly disclose these situations.

We comply with all laws, regulations, and U.S. government contracting rules regarding conflicts of interest.

Certain client contracts require us to disclose financial or other personal interests. When required, we make these disclosures fully and accurately, and update them as required.



Examples of potential individual conflicts of interest include:

- Having a personal, romantic, or familial relationship with someone in your direct reporting chain or with someone whose work you indirectly oversee or influence
- Having personal or familial financial interests with an entity that competes with or does business with Booz Allen
- Having secondary employment (i.e., non-Booz-Allen employment) with an entity that competes with or does business with Booz Allen or performing the type of work you perform for Booz Allen
- Holding an outside advisory or board position
- Engaging in outside speaking activities or authoring works related to Booz Allen or the work you perform for Booz Allen



QUESTION:

I'd like to make some extra money by working on weekends; do I have to disclose this to the firm?

**ANSWER:**

It depends. Many part-time activities do not require disclosure or prior approval (e.g., Uber driver, retail sales, food service, home improvement/landscaping jobs). If you will be using skills that you are employed to use (e.g., coding, project management), it is best to check with your manager for guidance.

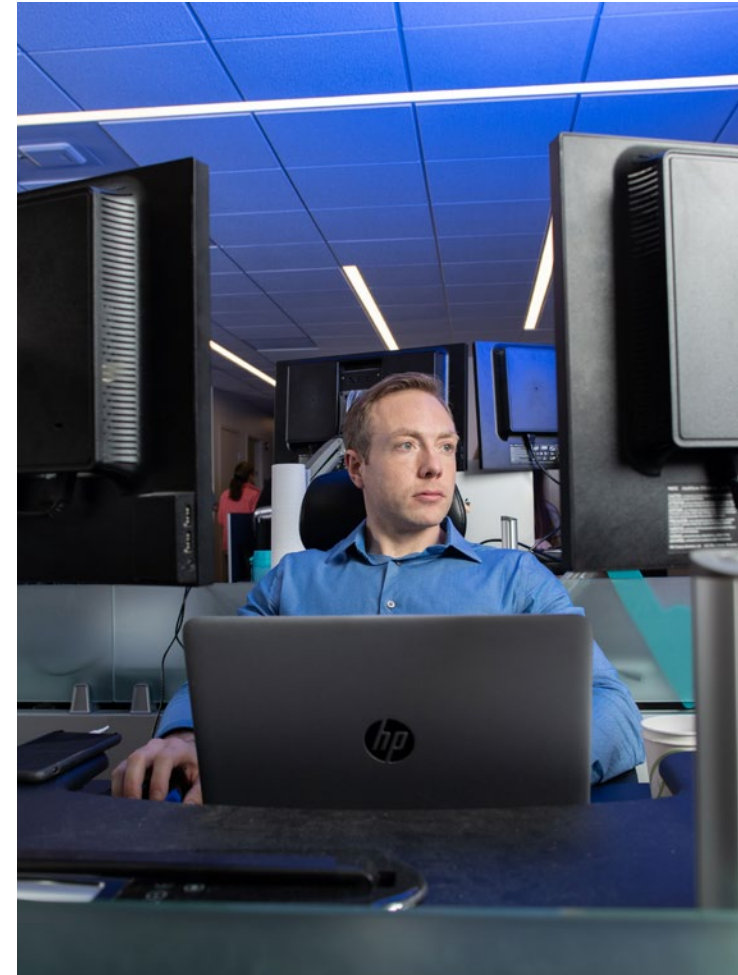
Some secondary employment opportunities will require approval from HR and your leadership, so please check the policy, and where required, complete a Secondary Employment Form.

QUESTION:

I've been approached to sit on the board of another company. Do I need to seek approval from someone at the firm prior to accepting this position?

ANSWER:

Yes. You should inform your manager and contact Ethics & Compliance to perform a review of the situation. Sometimes, participation on other companies' boards could be a conflict; we will look at the type of company, the services it provides, and any impact it may have on your responsibilities with Booz Allen.

**ADDITIONAL RESOURCES**

Organizational Conflict of Interests Policy
Individual Conflicts of Interest Policy



We Keep and Maintain Accurate Records

WHAT

We're all responsible for creating and maintaining accurate records and for ensuring that we keep these records in the right place and for the right amount of time. We never misrepresent, falsify, alter, or improperly destroy data, records, or other information.

WHY

Reliable business records enable us to make informed business decisions for the benefit of the firm, our shareholders, and our clients in accordance with our Records Retention schedule and applicable laws and regulations.

HOW

We have policies, procedures, and controls that govern our information, from creation and handling, to access and security, to proper disposal and destruction.

We follow all retention instructions of Legal Hold notices. Such notices supersede (and are given priority over) any conflicting retention schedule.



A **corporate record** is any recorded information, regardless of format, which is made, received, or retained by Booz Allen in connection with firm business. Examples of records include contracts, client presentations, financial spreadsheets, time records, internal memorandums, investor reports, personnel files, and photographs.

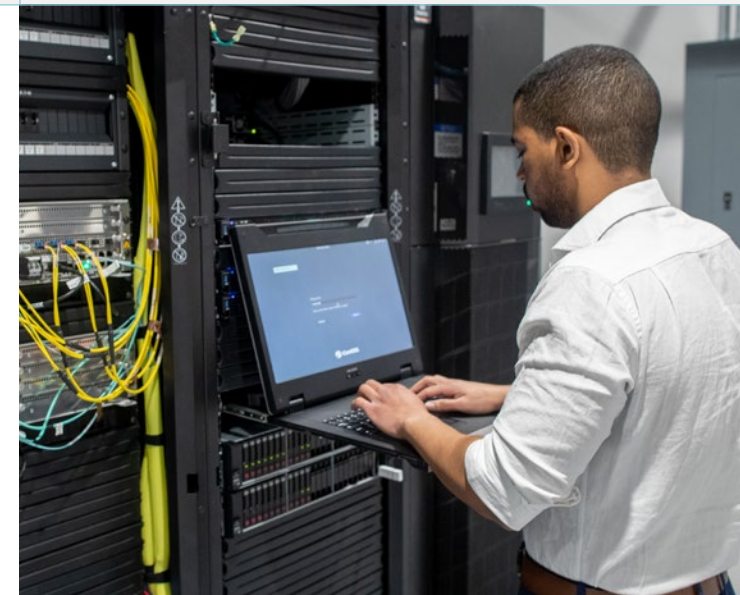
Consider These Possible Scenarios:

“I don't care how you do it—just make the numbers work.”

“This contract is maxed out; charge these costs to a different contract.”

“Don't put that in writing. I don't want any record of this conversation.”

Hearing comments like these? Stop and seek help. If it sounds improper or unethical, it probably is.



ADDITIONAL RESOURCES

[Corporate Records Management and Legal Holds Policy](#)



We Protect and Use Assets Responsibly

WHAT

We properly use and protect the firm's, our business partners', clients', and other third-parties' assets that have been entrusted to us including information technology resources, materials, facilities, and equipment.

WHY

Access to these assets maximizes our ability to conduct business in a competitive, productive, and efficient manner. We are thankful for and respectful of these opportunities and recognize that we have a responsibility to protect these assets.

HOW

We do not use these assets for anything other than a legitimate business purpose and in accordance with the firm's policies and any applicable contract terms.

We never allow unauthorized parties, including family members, to access our firm's or others' assets, and we take appropriate steps to protect against inadvertent access. We understand that we have no expectation of privacy when using the firm's or others' assets.



QUESTION:

I would like to send work to my personal email address so I can view it on a non-Booz Allen device and print it out at home. Am I allowed to do so?



ANSWER:

No. Booz Allen work and client work must only be viewed on the firm's approved information technology devices. Sending work to a personal email address is not permitted and could create a security risk.

QUESTION:

A senior leader asked for my help in organizing a fundraiser to benefit a charity she supports that is not sponsored by Booz Allen. She will be inviting everyone from the office to attend, and she will be hosting it in a firm conference space. Is this an appropriate use of firm assets?

ANSWER:

No. Even though well-intentioned, these actions would constitute a misuse of firm assets. You should let this leader know that you cannot assist her in this capacity. If you feel uncomfortable telling her "no," you should consult with your Job Leader or Career Manager or raise the issue through another firm reporting channel.



ADDITIONAL RESOURCES

IT Acceptable Use and Computing Environments Policy

Workplace Health, Safety, Security, and Access Policy

Data Privacy Policy

Intellectual Property Policy



We Protect Booz Allen, Client, and Third-Party Information

WHAT

We protect all information entrusted to us, whether it belongs to Booz Allen, a business partner, a client, or other third party. This includes the firm's intellectual property and capital assets, our business partners', and clients' information, including U.S. government classified and controlled unclassified information and other information entrusted to us by third parties.

WHY

Information is a valuable asset and we must be vigilant in protecting it—no matter who the information belongs to. Our clients entrust information to us that is essential to national security and global stability. Because of the importance of this information and its relationship to the overall success of our business, all information owned by or entrusted to Booz Allen must be handled with necessary care.

HOW

We exercise great care and follow robust firm procedures when we create, handle, access, use, secure, and dispose of information.

We follow all information security rules when utilizing any computer-enabled device or when we communicate with others inside or outside of Booz Allen.

We maintain robust counterintelligence and insider threat programs to detect and prevent unauthorized access to firm and client information.

We require Booz Allen employees to maintain their obligation to protect all information entrusted to them during their employment and after they leave the firm, even when the Booz Allen assets and copies of information are returned (as required).





Booz Allen maintains a robust insider threat and counterintelligence operation to protect U.S. government information.

Even with these tools at our disposal, it is important for our employees to remain vigilant in detecting potential security risks and promptly reporting them.

QUESTION:

A colleague referenced work he is doing on behalf of a U.S. government client in a social media post. What should I do?



ANSWER:

If you feel comfortable, you can raise the concern to the employee and let them know that it is against firm security policies to discuss client projects outside of work. Regardless of whether you speak to the employee directly, you should also report the concern through one of the firm's reporting channels.

QUESTION:

When I started with Booz Allen, I signed an agreement concerning intellectual property and the protection of firm information. Does this still apply when I leave the firm to pursue other career opportunities?

ANSWER:

Yes. You must adhere to the restrictions on disclosing firm or client information, even after your employment with Booz Allen concludes. Unless such information is publicly available, you cannot freely discuss client or firm business when you move on in your career.



ADDITIONAL RESOURCES

- Information Security Policy
- IT Acceptable Use and Computing Environments Policy
- Intellectual Property Policy



We Protect Booz Allen's Image and Reputation

WHAT

We protect our image and reputation so that we can preserve and build upon our goodwill and enhance the overall success of the firm.

WHY

We value the trust of our people, clients, and communities, which form the bedrock of goodwill and our overall success. For more than 100 years, the firm has built a reputation as a well-respected and trusted advisor to our clients. We are proud of this reputation—our image is what our clients, business partners, and the world perceive us to be. It represents who we are and our belief that we can empower people to change the world.

HOW

We ensure that information shared about Booz Allen is consistent, accurate, and complete. We all represent a single Booz Allen brand, and we follow the firm's policies when using the firm's name or brand.

We seek the proper approvals for any use of the firm's name or image including use by a third party, at a tradeshow or event, public speaking engagements, media interviews, or authoring any works such as a book or an article.

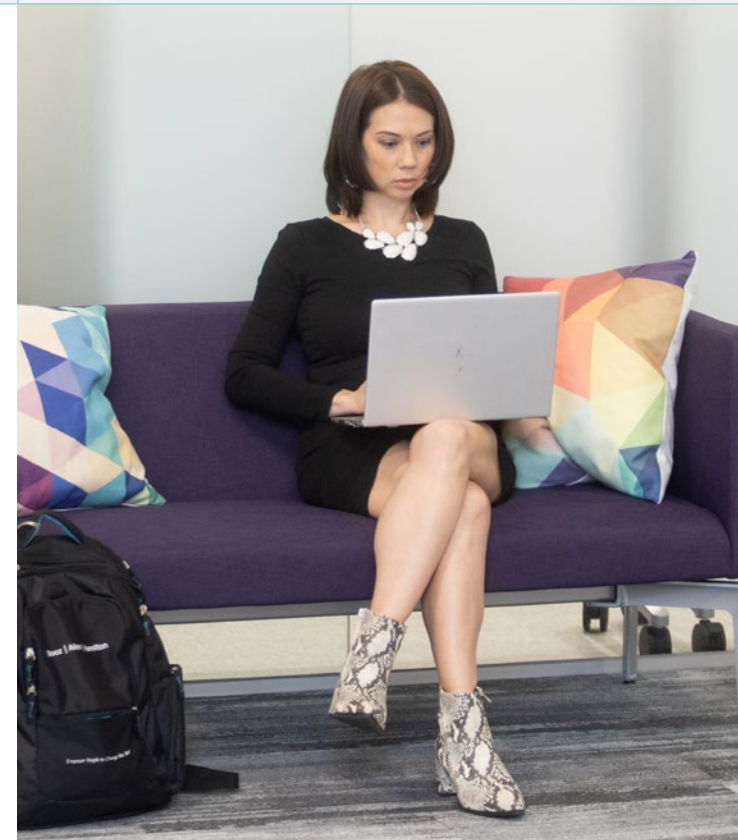
Our public communications are accurate and preserve confidentiality commitments to our clients, employees, and third parties.

We are thoughtful when engaging on social media and understand that our personal and professional images are linked. We indicate that our personal opinions are our own and do not necessarily reflect the views of the firm. We follow our company policies and guidelines on sharing information and setting up social media accounts representing or referring to Booz Allen. We never post any content that could be reasonably viewed as malicious, slanderous, obscene, threatening, retaliatory, intimidating, or that might constitute discrimination, harassment, or bullying.



Remember:

You are a Booz Allen employee 24/7, whether you are at home, a Booz Allen or client office, a happy hour, on vacation, or on social media. We are accountable for our personal and professional conduct, both inside and outside of work.



QUESTION:

I want to set up a social media account to promote a new product we're marketing. Do I need to obtain approval?

ANSWER:

Yes. If you plan to use a social media account to conduct Booz Allen business, contact Corporate Affairs (corporate_affairs@bah.com) for information on the review process.

QUESTION:

A colleague wrote an offensive social media post that would violate our policies if they said it at work. Do I have an obligation to report this?

ANSWER:

Yes. Booz Allen people are required to follow firm policies at or outside of work, including on social media. Use one of the firm's reporting channels to raise your concern so the firm can investigate. Remember, the firm does not tolerate retaliation against anyone for raising a good-faith ethical or legal concern that someone is violating a policy or the law.

QUESTION:

A third-party supplier wants to use the Booz Allen logo to promote the firm's use of a product. Can I send the supplier our logo?

ANSWER:

No. We do not permit third-party suppliers to use the Booz Allen logo to promote the firm's use of a product or service. Please refer to the firm's [Third-Party Logo Use guidelines](#) for more information or contact the Brand team with any questions (brand@bah.com).

QUESTION:

I have an upcoming speaking engagement and my bio references my employment at Booz Allen. Do I need to obtain approval?

ANSWER:

Yes. Any publication or speaking engagement that will mention firm affiliation, clients, or relevant subject matter must be approved by your leadership and Corporate Affairs. Contact Corporate Affairs (corporate_affairs@bah.com) for more information.



ADDITIONAL RESOURCES

- External Communications Policy
- Brand Policy
- Using Social Media Policy



We Do Not Engage in Insider Trading or Tipping

WHAT

We do not directly or indirectly purchase or sell securities of the firm, its affiliates, or any other company, while in possession of material non-public information concerning the firm or any other company.

WHY

Complying with the laws and regulations regarding the trading of securities promotes a fair and open market for not only our people and our shareholders, but for all market participants. Our compliance with these laws is not only mandatory, but critical in our role as a publicly traded company.

HOW

We do not disclose non-public information in our possession to anyone outside the firm including family or friends, in a social setting or public place, or on social media.

We provide all current and prospective investors with equal access to material information concerning our business and financial performance. We do not trade securities during periods when trading is restricted.

All contact with investors and analysts is handled by our Investor Relations group. We do not respond to individual inquiries from the investment community unless specifically asked to do so by an authorized individual in the Investor Relations group.

QUESTION: How do I know if I'm a designated insider?

ANSWER:

Employees of Booz Allen who are identified as likely to have access to material non-public information in connection with carrying out their duties are considered Booz Allen "designated insiders."

Examples of designated insiders are members of the Board of Directors; all Booz Allen partners, vice presidents, and their executive assistants; all employees of the Legal Department and Corporate Finance Integrated and Analysis Management Forecasting and Planning; and senior associates and principals in Information Services, People Services, Finance, and Corporate Development and Strategy groups.



QUESTION: What is material non-public information?

ANSWER:

Information is material if it would be likely to affect a company's stock price or if it would be important to a reasonable investor in deciding whether to buy, hold, or sell that company's securities.

Information is generally not public unless it has been disclosed in a press release, in a public filing, in materials provided to shareholders broadly, or is available through a news wire service or daily newspaper of wide circulation.

Material non-public information can include earnings reports, merger or acquisition targets, bid or price proposal information, client contract status, and pending legal outcomes.

If you are unsure whether information about Booz Allen is either material or non-public, contact the Corporate Secretary at ethics@bah.com.



ADDITIONAL RESOURCES

Insider Trading Policy



We Cooperate with Investigations

WHAT

We cooperate fully with internal and government investigations and other government oversight related to our business.

WHY

Transparency and cooperation are keys to our success in maintaining our reputation as a highly ethical organization.

HOW

We provide complete, honest, and thorough information related to an investigation, audit, or review—even if doing so means revealing violations of policy by ourselves or others. We preserve all documents, data, and other materials related to any matter that is subject to government or internal investigation, audit, or review.

Government oversight can include audits, floor checks, and investigations and can involve techniques to obtain information including subpoenas, search warrants, interviews, and informal requests for information. When responding to these government requests, we are cooperative, truthful, and as accurate as possible.

If we are contacted by a representative of the government or a third-party investigator or asked to provide any firm property, documents, or information external to the firm, we promptly contact the Legal Department.



ADDITIONAL RESOURCES

[Cooperating with Investigations and Making External Disclosures Policy](#)





**WE VALUE OUR
ROLE AS A GOOD
CORPORATE
CITIZEN**

We Are Committed to Upholding Human Rights

WHAT

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.

WHY

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.

HOW

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.

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.

In addition to the resources provided in our Code, employees may report any suspected trafficking activity to the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

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



ADDITIONAL RESOURCES

For more information on Booz Allen's policies, processes, programs, and practices in support of our commitment to Human Rights, [click here](#).

Booz Allen's ESG Impact Report

We Respect the Political Process

WHAT

We respect the political process and our employees' rights to participate in it on their personal time, and we uphold our responsibilities when engaging in lobbying on behalf of the firm.

WHY

We support an active and fair political process that provides an opportunity for everyone to have a voice.

HOW

We comply with campaign finance and election laws. Our policies explain how to identify any conflicts of interest, including those that may arise as part of participating in the political process as individuals or as an enterprise, and when and how to disclose the conflict.

As a firm, we belong to various associations and groups that may engage in lobbying activities, but any direct engagement in their lobbying activities on behalf of the firm must be approved by **Government Relations**.

Employees are encouraged to engage in personal political activities on their own time using only their own resources and are not permitted to use the firm's name or resources for political purposes.


We avoid engaging in political activities on behalf of our clients. We do not lobby on behalf of the U.S. government. We do not testify on behalf of a U.S. government agency, draft testimony for its officials to deliver, respond to questions or correspondence from U.S. Congress, or draft agency responses to U.S. government audits, unless these activities are included in the scope of work for a client as a part of responding to Congressional oversight of the executive branch. If we engage in any political activities or lobbying on behalf of other clients, we comply with all applicable registration and other legal requirements.



ADDITIONAL RESOURCES

[Political Activities and Lobbying Policy](#)
[Individual Conflicts of Interest Policy](#)



 The firm does not make contributions to candidates, political parties, or committees at any level. The Booz Allen Hamilton Inc. PAC is a separate segregated fund that is funded by voluntary contributions from eligible Booz Allen employees and members of our corporate board. The Booz Allen PAC operates in accordance with all federal laws, and contributions are reported to the Federal Election Commission.

We Engage in Our Communities for Social Good

WHAT

We contribute to the communities where we live and work and use our resources to change the world.

WHY

Booz Allen cares about its people and the communities where they live and work, supporting communities through the generosity of our business and the collective ingenuity of our employees.

HOW

We encourage all employees to be actively involved in the community through volunteerism. We do so by working through established groups within our firm, participating in firm-sponsored activities, and encouraging contributions to charitable, educational, or civic organizations. We also engage in community impact activities as a firm, providing services to eligible organizations free of charge and supporting charitable causes through philanthropic partnerships.

When engaging in activities in our communities for social good, we have an obligation to protect the firm’s reputation and appropriately set expectations with the organizations we serve as volunteers by following Booz Allen brand and volunteerism policies.

We promote employee engagement by offering diverse opportunities to engage, both personally and through firm-sponsored partnerships. We offer valuable opportunities for our people to learn, develop skills and capabilities, and enhance their visibility both within the firm and our communities.



ADDITIONAL RESOURCES

Time Reporting and Staff Alignment Policy

Booz Allen Cares

We Are Committed to Environmental Sustainability

WHAT

We endeavor to reduce our impact on the environment through conservation efforts related to our energy consumption, greenhouse gas emissions, water use, and waste generation.

WHY

We have a responsibility as a corporate citizen to make a positive impact in building a more sustainable society.

HOW

We comply with all applicable environmental laws and regulations and operate in a manner that incorporates leading practices such as greenhouse gas reduction measures, efficient use of resources, and minimizing waste generation. We develop innovative and sustainable solutions for our clients to help address global challenges while promoting responsible consumption of resources in operating our business.



ADDITIONAL RESOURCES

[Booz Allen's Commitment to Sustainability](#)

We all play an essential role in maintaining Booz Allen’s culture of integrity. It isn’t just about the words on these pages—it’s about our actions every day. We will only be able to raise the integrity bar if we rigorously hold ourselves and one another accountable for living our Values and complying with the Code. The long-term success of our firm, our culture and our clients will best be secured if we allow integrity, our Values and the Code to guide our decisions and we make it a priority to promptly speak up any time we have questions or concerns.

Thank you for doing your part to contribute to our culture of integrity.

Waiver of the Code or Policy

Our Code represents our values in action and applies to all employees, corporate officers, members of our Board of Directors, contractors, consultants, and others working on our behalf. Waivers of our Code are strongly disfavored. Any waiver of our Code for directors or officers (which is only necessary in rare instances where there is a clear benefit to the firm in granting the waiver) must be approved by the Board of Directors or its duly authorized committee and shall be disclosed promptly to the firm’s shareholders.