



Combating Trafficking in Persons Policy

SPONSORING ORGANIZATION: Ethics & Compliance

INTRODUCTION

Human rights are the most fundamental rights that we have, and Booz Allen joins the global community in promoting and protecting human rights and working to stop actions that infringe on these rights.

The purpose of this policy is to prohibit, and establish measures to prevent, activities within our organization and in our supply chain that constitute or promote the trafficking of humans or forced labor.

SCOPE

This policy applies to all employees, officers, directors, independent contractors, subsidiaries, and affiliates of the firm.

POLICY

All Booz Allen employees and business partners are required to comply with laws and regulations, including U.S. Government laws and regulations, regarding combating trafficking in persons and trafficking-related activities. We condemn human trafficking and forced labor, and do not engage in such activities within our firm or throughout our supply chain. Specifically, Booz Allen prohibits all of the following activities:

- Trafficking in persons
- Procurement of commercial sex acts
- Use of forced labor
- Destroying, concealing, confiscating or otherwise denying an employee access to the employee's identity or immigration documents
- Use of misleading or fraudulent practices during the recruitment of employees or offering of employment
- Using recruiters who do not comply with local labor laws
- Charging employees recruitment fees
- Failing to provide or pay for return transportation to an employee's home country upon the end of employment
- Providing or arranging housing that fails to meet the host country housing and safety standards
- If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing

Employees who are required to relocate will be provided work documentation at least five (5) days prior to the employee's relocation. Documentation will include details of the work description, wages, work location(s), living accommodations and costs, time off, roundtrip transportation arrangements, and how to report a grievance, as well as a statement reflecting the firm's prohibition on charging recruitment fees and the content of any applicable laws and regulations prohibiting trafficking in persons.

CORPORATE COMPLIANCE PLAN

Booz Allen maintains a Combatting Trafficking in Persons (CTIP) Corporate Compliance Plan (the "Plan") that establishes Booz Allen's corporate compliance standards related to this policy. The Plan applies to all contracts for supplies, other than commercially available off-the-shelf items, acquired outside the United States, or services to be performed outside the United States that have an estimated value that exceeds \$500,000. When a contract-specific Plan is required, Booz Allen will implement additional contract-specific controls to satisfy the contract requirements.

REPORTING CONCERNS

We expect Booz Allen People to comply with our policies and promptly raise questions or concerns about our business and/or business practices. Violations of any Booz Allen Policy, including this one, will be addressed in accordance with our Discipline for Misconduct Policy.

We rely on Booz Allen people to report suspected violations of our policies and our Code of Ethics and Business Conduct. As outlined in our Mandatory Reporting and Non-Retaliation Policy, if you observe or have reasonable suspicion that a Booz Allen policy or the Code has been violated, you have a responsibility as part of your employment to promptly report your concerns by contacting any of the following firm resources:

- Your Job Leader or Career Manager
- One of the firm's Ethics Advisors
- Human Resources via the Help Desk
- Employee Relations
- The Legal Department
- The firm's Ethics & Compliance Team
- The firm's Chief Ethics and Compliance Officer
- The firm's Ethics HelpLine (at +1-800-501-8755 (US) or +1-888-475-0009 (international))
- The firm's site for anonymously reporting concerns (<http://speakup.bah.com>)

We take all allegations of misconduct seriously, investigate them promptly and strictly prohibit retaliation against any person who raises a good faith ethical or legal concern.