



# Equal Employment Opportunity and Affirmative Action Policy

**SPONSORING ORGANIZATION:** People Services

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## **INTRODUCTION**

Booz Allen is dedicated to enhancing diversity in the workplace and demonstrates that commitment by developing programs, policies and procedures that foster a work environment in which differences are respected and all employees are treated fairly. The firm complies with all laws prohibiting discrimination against employees and applicants and is committed to providing equal employment opportunities for qualified employees and applicants.

Booz Allen is an equal opportunity employer and committed to providing a workplace that is free from discrimination based on race, color, ethnicity, religion, sex, national origin, age, marital status, sexual orientation, gender identity and expression, disability, veteran status, uniformed service member status, pregnancy, genetic information, or any other status protected by applicable federal, state, local, or international law. Booz Allen's Chairman and Chief Executive Officer champions equal employment opportunities for all Booz Allen people.

This policy and firm procedures and programs support compliance with Federal Acquisition Regulation (FAR) requirements and other applicable laws for US government contractors related to equal employment and affirmative action.

## **SCOPE**

This policy applies to all Booz Allen employees, officers, directors, subsidiaries, and affiliates of the firm, as well as all applicants for employment with Booz Allen (referred to as "Booz Allen people").

## **POLICY**

Booz Allen is committed to providing equal opportunity in our employment practices, including but not limited to our hiring practices, benefits, compensation, career advancement, and disciplinary action. All Booz Allen people are expected to comply with the firm's policies related to equal employment opportunity and affirmative action.

### **Affirmative Action Plans**

The firm is committed to the principles of affirmative action. Booz Allen implements affirmative action plans (AAPs) that include specific action-oriented programs and goals designed to advance the principles of equal opportunity in all aspects of employment actions, including the recruitment, selection, training, advancement, and compensation of qualified females, minorities, veterans, and individuals with disabilities in all job titles, to ensure that all personnel actions are administered without regard to protected status, and to ensure that all employment decisions are based only on valid job requirements. The Employment Risk Management and Compliance team in People Services, which has overall responsibility for the firm's affirmative action plans, conducts plan audits and reporting in compliance with requirements of the Office of Federal Contract Compliance Programs (OFCCP) and any other applicable laws.

The AAPs for protected veterans and individuals with disabilities are available for review upon request during normal business hours by contacting the Employment Risk Management and Compliance team.

### **Pay Transparency**

Booz Allen is committed to providing equal employment opportunity protections to employees or applicants who have inquired about, discussed, or disclosed their compensation or, in certain situations, the compensation of an applicant or another employee.

Generally, Booz Allen will not take adverse action against and Booz Allen will not discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant.

The above provision does not apply to instances in which a Booz Allen person, who has access to the compensation information of other Booz Allen employees or applicants as a part of his/her essential job functions, discloses that information to individuals who do not otherwise have access to compensation information unless the disclosure is:

- a) in response to a formal complaint or charge,
- b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by Booz Allen, or
- c) consistent with Booz Allen's legal duty to furnish information 41 CFR 60-1.35(c).

Booz Allen people who have questions about compensation information, including whether and when employees who have access to pay information may share that information, should contact Human Resources via the Help Desk.

#### **Reporting Allegations of Discrimination**

The firm has established procedures to investigate allegations of employment discrimination, and if appropriate, remediate such actions. Employees may, but are not required to, address concerns of employment discrimination directly with the alleged offending party.

Any applicant or Booz Allen person who believes they have been discriminated against should follow instructions in the Reporting Concerns section at the end of this policy.

#### **Investigations of Allegations of Discrimination**

The firm's Employee Relations and Investigations team, under the direction of the Legal Department, will lead an impartial and prompt investigation into each allegation of a violation of this policy. Please see the Cooperating with Investigations and Making External Disclosures Policy for more information about the process for investigations.

The firm and its representatives recognize the serious nature of these matters and will maintain confidentiality to the greatest extent possible in all situations, consistent with applicable law. Employees are also expected to respect the confidentiality of investigations.

Booz Allen employees and applicants shall not be subjected to harassment, intimidation, threats, coercion, retaliation, or discrimination because they have engaged in or may engage in any of the following activities: (1) filing a complaint; (2) assisting or participating in an investigation, compliance evaluation, hearing, or any other activity related to the administration of the affirmative action provisions of VEVRAA or any other Federal, state or local law requiring equal opportunity; (3) opposing any act or practice made unlawful by VEVRAA or its implementing regulations in this part or any other Federal, state or local law requiring equal opportunity; or (4) exercising any other right protected by VEVRAA or its implementing regulations in this part, or any other Federal, state or local law requiring equal opportunity.

#### **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.