

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

SPONSORING ORGANIZATION: Legal, Ethics & Compliance

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## INTRODUCTION

Booz Allen is committed to conducting business ethically and in compliance with the law. In the ordinary course of business, Booz Allen and Booz Allen people use company resources and engage in activities to accomplish the company's strategic goals, engage with clients and participate in the community. These activities may include giving or receiving gifts and business courtesies, engaging in corporate community impact activities, and making or accepting corporate sponsorship payments.

The purpose of this policy is to establish rules for when and how Booz Allen and Booz Allen people may give or receive gifts and business courtesies, use Booz Allen funds and other company resources to support charitable organizations and social causes, and make or accept sponsorship payments on behalf of Booz Allen.

## SCOPE

This policy applies to all employees, officers, directors, subsidiaries, and affiliates of the company (referred to as "Booz Allen people").

## POLICY

This policy provides definitions of gifts and business courtesies, corporate community impact activities, and corporate sponsorship payments, and the company's general criteria, specific rules and guidance for engaging in any of these activities.

## GENERAL CRITERIA

Booz Allen people must apply the following **general criteria** when engaging in gifts and business courtesies, corporate community impact activities and corporate sponsorship payments, in addition to more specific rules imposed in the following sections:

1. **Identity:** Know the name, title and role of each recipient/giver.
2. **Business Purpose:** Ensure that you are engaging in the activity to advance Booz Allen strategies and objectives. If you have any questions about whether an activity meets these criteria, check with your leadership. The activity must never be used by Booz Allen or any third party to improperly seek a business advantage or to otherwise violate the law, our policies or the policies of any third party. If you are uncertain whether an activity is permitted under another party's policies, check with them.
3. **Conflicts and Appearance of Impropriety:** Ensure that the activity poses no **conflict of interest** for Booz Allen. See the **Booz Allen Conflicts of Interest** policies and the Code of Business Ethics and Conduct for more information on **conflicts of interest**.

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### GIFTS AND BUSINESS COURTESIES

**Gifts and business courtesies** are things of value that are either (a) given by Booz Allen people to individuals outside of Booz Allen who have some preexisting or potential business relationship with Booz Allen or could otherwise directly impact Booz Allen's business in their official capacity (e.g., licensing authorities), or (b) received by Booz Allen people from third parties that have some existing or potential business relationship with Booz Allen.

A thing of value is considered a gift or business courtesy regardless of how it is paid for. The value of the gift or business courtesy is the fair market value, meaning the amount that the recipient would have to otherwise pay for the gift or business courtesy in a transaction between unrelated parties.

Gifts and business courtesies include meals, travel, entertainment, nominal promotional items or anything else that has some value. Gifts and business courtesies do not include:

- x Anything the giver is legally obligated to provide to the recipient (e.g., travel provided by Booz Allen to a client pursuant to a contract), is typically provided as part of the recruiting process (e.g., reimbursement of meals, lodging or transportation to a candidate), or for which the recipient pays the full fair market value (e.g., by contributing to a fair share jar or otherwise reimbursing the giver); and
- x Personal gifts not reimbursed by Booz Allen, meaning things of value given or received by a Booz Allen person based on a preexisting personal relationship or otherwise completely independent of the business relationship between Booz Allen and the giver or recipient.

#### Gifts and Business Courtesies Rules

Rules for giving and receiving gifts and business courtesies vary depending on who is giving or receiving the gift.

#### **Prohibited Gifts and Business Courtesies**

The following **items are always prohibited** as gifts or business courtesies:

- x Cash, checks and cryptocurrency, personal loans, gifts cards that may be spent anywhere, cash awards (including honorariums), per diems, and contributions through crowd-funding sites; and
- x Items or entertainment that are illegal in the jurisdiction in which they are given, or which are widely recognized as unacceptable within a business relationship.

Booz Allen people are always **prohibited from giving gifts or business courtesies to** any of the following parties:

- x Employees or officials of U.S. federal agencies classified as Senior Executive Services members (typically political appointees above the General Schedule grade 15)
- x Members or employees of the U.S. Congress
- x Judges, employees or other officials of any U.S. federal court
- x Employees or officials of current or prospective government or commercial clients, prime contractors or alliance/strategic partners who are in a position to make or influence a decision about business for which Booz Allen is competing, or any similar business negotiations or matters. If you are unclear whether a party is in a position to make or influence a decision about current or prospective business matters, contact Legal, Ethics & Compliance.
- x Employees or officials of government agencies who are in a position to influence a significant policy, regulatory or enforcement decision that will directly and specifically impact Booz Allen.

Booz Allen people are also always **prohibited from receiving gifts or business courtesies from** any of the following parties:

- x Entities or individuals that are competing or otherwise negotiating to become a supplier of Booz Allen if the Booz Allen recipient is in a position to make or influence decisions related to the competition or negotiation.
- x Entities or individuals that are competing or otherwise negotiating to become a supplier of the U.S. Government where Booz Allen is advising the U.S. Government on the selection or evaluation of the supplier.

#### **Additional Rules for Gifts to or From Government Officials**

A **government official** is any director, officer or employee of a national, state, or local government agency, entity, or body; a state-owned or state-controlled company or entity; a public international organization; or a political party outside the US; or any royal family member, candidate for office, or political party outside of the US.

In line with the rules applicable to U.S. Federal Government officials for gifts and business courtesies, Booz Allen people are permitted to give and receive gifts or business courtesies to a **U.S. Government official** that meet the **general criteria stated in this policy** and that are valued at USD \$20 or less per event up to a total of \$50 in a calendar year.

Booz Allen people are permitted to give and receive gifts and business courtesies to and from **non-U.S. government**

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communications form a robust Ethics & Compliance program, promoting a culture of integrity that shapes all facets of employee conduct.

Anyone can report an ethics concern to our Ethics HelpLine at +1-800-501-8755 (US) or +1-888-475-0009 (International) or [Speakup.bah.com](https://speakup.bah.com). Concerns may be raised anonymously.

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