

: Ethics & Compliance

Booz Allen has zero tolerance for bribery and corruption. We conduct our business with integrity, win work only on the strength of our services and solutions, and require all people and organizations acting on our behalf to do the same. The purpose of this policy is to clearly state Booz Allen's prohibition on and define conduct that constitutes bribery or corruption, and set forth several specific rules designed to prevent bribery and corruption. This policy promotes compliance with laws that prohibit corruption and bribery in all countries where Booz Allen operates or conducts business, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act.

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

Booz Allen's policy concerning bribery and corruption is absolutely clear:

- **No Government Bribery:** Booz Allen people must not offer, make, authorize or allow payments, gifts, or the transfer of anything of value to Government Officials to obtain any business advantage for Booz Allen or anyone else.
- **No Commercial Bribery:** Booz Allen people must not offer, make, authorize or allow payments, gifts, or the transfer of anything of value to employees or representatives of businesses to obtain any business advantage for Booz Allen or anyone else. Booz Allen people must not solicit or accept payments, gifts, or anything of value offered in exchange for any business advantage for a supplier or anyone else.
- **No Kickbacks:** Booz Allen people must not offer, make, authorize, allow, solicit or accept payments, gifts, or the transfer of anything of value to or from any businesses (including our prime contractor, customers, or suppliers) or their employees or representatives for the purpose of providing or obtaining any business advantage related to federally funded projects, except for bona fide payments (a) made to suppliers pursuant to Booz Allen's Procurement or Procurement services, or (b) received by our prime contractors or customers for work performed by Booz Allen. Exceptions to this general prohibition are permitted only when approved in writing by the Ethics & Compliance (a) 49i2(a) 6 1 34 .93 fm0 (1) JET 0.00 0009

branches or offices minority owned by Booz Allen to maintain a system of internal accounting controls and ensure that all transactions are recorded accurately.

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

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