

: Ethics & Compliance

Booz Allen is a global firm that serves clients around the world. We work with people, products, and technology that crosses international borders and with multinational teams. We therefore must ensure compliance with applicable international trade regulations. These regulations are in place to protect national security and global stability by ensuring that sensitive technologies are appropriately secured. These laws are also in place to ensure that companies don't support countries, organizations, or individuals which are engaged in terrorism, international drug trafficking, human rights violations, or other significant misconduct with global implications.

The penalties for violating international trade regulations are severe – not only would Booz Allen suffer significant reputational damage, but possible debarment from government contracting, very large corporate fines and we would damage our relationships with an important client – the U.S. Department of Defense, which is a key trade regulations stakeholder. As a global firm, we must consider the international trade regulations in all the countries where we do business.

The purpose of this policy is to set forth the requirements to comply with international trade regulations and explain how these regulations impact where we do business, who we do business with, and what we do when we engage in cross-border business activities that involves sensitive technologies.

3. _____ You must protect export-controlled items or information from unauthorized access. Booz Allen information and the information entrusted to us by our clients and others may be subject to export controls. If you are entrusted with export-controlled information or items, you must ensure that those items are only accessed to authorized foreign persons. Any questions regarding whether an item is export-controlled can be directed to the ITC team.
4. _____ You must contact Ethics & Compliance if you become aware of a 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. While anti-boycott issues are generally identified and reviewed in connection with the opportunity management process, any employee that recognizes a potential anti-boycott request must report the request.

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.