



Gifts and Business Courtesies

INTRODUCTION

Booz Allen is committed to conducting business ethically and in compliance with the law. Booz Allen has zero tolerance for corruption or any other activity that violates anticorruption laws in any place we do business. The firm will not pursue any business that requires unethical or illegal activity, including bribery, to obtain or retain that business.

Under proper circumstances, giving or receiving a gift or business courtesy can help build or maintain a strong business relationship. However, giving or receiving such gifts and business courtesies may be restricted or prohibited by law, contract terms or internal policies of the recipient's employer. Also, giving or receiving gifts or business courtesies may create the appearance of impropriety.

The purpose of this policy is to ensure that whenever Booz Allen people are offering, giving, or receiving a gift or business courtesy in connection with the firm's business, that they do so in accordance with applicable law and contract requirements, and avoid actual or perceived conflicts of interest, or the appearance of impropriety.

SUMMARY OF POLICY

Booz Allen's Gifts and Business Courtesies policy covers all of the following content in detail:

- Related policies at the firm that employees should read in connection with this policy
- Scope of who the policy applies to
- Defines and gives examples of gifts and business courtesies, including certain items that are prohibited from being given or received
- Defines government officials
- Establishes criteria that all gifts and business courtesies must satisfy
- Prohibits political contributions, either directly or indirectly, unless coordinated solely by Government Relations
- Sets forth the rules and approvals required for offering, giving, or receiving gifts and business courtesies in connection with U.S. government officials, non-U.S. government officials, employees of commercial companies or not for profit organizations, employees of current or potential business partners, and between Booz Allen Employees
- Confirms actions that will be taken when violations of the policy have been identified, employee's duty to report violations of the policy, and the firm's zero tolerance for retaliation against employees who raise a good faith legal or ethical concern
- Points of contact and additional resources