



Compliance with International Trade Regulations

INTRODUCTION

International trade regulations are in place to protect national security and global stability by ensuring 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. These laws are also in place to ensure that sensitive or potentially dangerous products or technology are not used to support terrorist or other activities that jeopardize the safety of civilian populations around the world, and to ensure that companies don't assist certain countries advance their military and intelligence capabilities.

The penalties for violating international trade regulations are severe – not only would Booz Allen suffer significant reputational damage, but possible debarment, 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.

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 technology from highly-regulated industries.

SUMMARY OF POLICY

Booz Allen's Compliance with International Trade Regulations 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
- Provides detailed rules on where the firm can do business, who the firm can do business with, what cross-border business activities the firm can engage in, and authorizations required to do so
- Outlines employee responsibilities on documenting new business opportunities, requesting review of other potential cross-border transfers, and raising potential anti-boycott issues and concerns
- 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
- Provides points of contact and additional resources