



Anticorruption and Anti-Bribery

INTRODUCTION

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.

SUMMARY OF POLICY

Booz Allen's Anticorruption and Anti-Bribery 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
- Explains what constitutes bribery and corruption, including definition of "anything of value"
- Provides definitions of the different types of government officials
- Outlines three prohibited categories of activities – government bribes, commercial bribes, and kickbacks
- Provides additional requirements for third party due diligence, guidance and approval of gifts and business courtesies, facilitating payment restrictions, and duress payment demands
- Sets forth record-keeping and internal financial accounting control requirements
- 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