



# Preventing Money Laundering and Terrorist Financing

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## INTRODUCTION

Booz Allen is committed to conducting business in an honest and ethical manner and in compliance with the laws of the countries where we operate. We have zero tolerance for fraud or financial crime, including money laundering and terrorist financing. Almost all countries where we conduct business have laws that prohibit money laundering and terrorist financing. This means Booz Allen is prohibited from either engaging in money laundering or terrorist financing, or assisting our clients or any third party, such as a business partner or supplier, in violating these laws. Failure to comply with money laundering and terrorist financing laws could result in severe civil or criminal penalties to Booz Allen and Booz Allen employees.

The purpose of this policy is to define activity that is prohibited under money laundering and terrorist financing laws, provide examples of red flags that could be signs of money laundering, terrorist financing, or other criminal activity, and explain the steps you must take if you identify red flags.

## SUMMARY OF POLICY

Booz Allen's Preventing Money Laundering and Terrorist Financing 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 definitions of money laundering and terrorist financing
- Explains how Booz Allen can be exposed to money laundering and terrorist financing, and in what circumstances the firm is at higher risk of being exposed
- Defines and provides several examples of red flags that could indicate money laundering, terrorist financing or other criminal activity
- Outlines three steps to take if employees identify red flags, including escalating the red flag with instructions on how to do so, pausing the transaction or business process that the red flag was identified in connection with, and avoiding tipping off third parties where prohibited by law
- 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