

**BOOZ ALLEN CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS**  
**(Last updated March 25, 2026)**

Booz Allen Hamilton Holding Corporation (together with its subsidiaries, the “Company”) has adopted this Code of Ethics for Senior Financial Officers (the “SFO Code”). The SFO Code supplements the Booz Allen Hamilton Code of Business Ethics and Conduct (“The Code”), which applies to all employees, officers and directors of the Company, as well as all other Company policies that pertain to personal and organizational conflicts of interest. For purposes of this SFO Code, a “Senior Financial Officer” is the Chief Executive Officer, Chief Financial Officer, Chief Administrative Officer, Chief Accounting Officer, Controller, and any other persons performing similar or related functions. This SFO Code, including any amendments or waivers, shall be made available to the public on the Company’s website, as proscribed by Item 406 of Regulation S-K.

**CONFLICTS OF INTEREST**

Each Senior Financial Officer shall conduct the Company’s business in an honest and ethical manner and avoid actual or apparent conflicts of interest between personal and business relationships. A conflict of interest occurs when a Senior Financial Officer’s private interests, personal outside activity, or personal relationships (including those of your family members) affect, may affect, or appear to affect the Senior Financial Officer’s professional duties, personal objectivity, or responsibility to act in the best interests of the Company, including when such interests, activities or relationships compromise, or appear to compromise, the Senior Financial Officer’s independence or objectivity related to Company decisions. Family members include the Senior Financial Officer’s spouse/partner, parents, children, siblings, in-laws, and anyone who shares the Senior Financial Officer’s home. Any such actual or apparent conflicts of interest shall be disclosed in writing to the Chief Legal Officer, the Disclosure Committee, or the Audit Committee as promptly as possible. For information with respect to conflicts of interest applicable to all employees, see the Code and other relevant Company policies.

Any Senior Financial Officer who has a doubt about whether a conflict of interest exists should contact the Chief Legal Officer for the Company’s determination of whether it believes a conflict of interest exists. Senior Financial Officers understand that the Chief Legal Officer’s client is the Company and the Chief Legal Officer cannot provide personal legal advice to a Senior Financial Officer.

**FINANCIAL DISCLOSURES**

Each Senior Financial Officer is responsible for full, fair, accurate, timely and understandable disclosure in the reports and documents that the Company files with, or submits to, the Securities and Exchange Commission, as well as in other public communications made by the Company. It is the responsibility of each Senior Financial Officer to promptly bring to the attention of the Chief Legal Officer, the Disclosure Committee, or the Audit Committee any material information of which he or she may become aware that affects or may affect the disclosures made by the Company in its public filings, including (a) any deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data, and (b) any fraud, whether or not material, that involves management or other employees who have a role in the Company’s financial reporting, disclosures or internal controls.

## **COMPLIANCE WITH LAW AND THIS SFO CODE**

Each Senior Financial Officer shall comply with all applicable laws, rules and regulations of federal, state and local governments and other private and public regulatory agencies that affect the Company's business, its conduct in business matters, and the Company's financial reporting. Each Senior Financial Officer shall promptly notify the Chief Legal Officer<sup>1</sup>, the Disclosure Committee, or the Audit Committee of any violation or suspected violation of laws, rules or regulations applicable to the Company or the operation of its business, by the Company or any employee or agent thereof. Each Senior Financial Officer shall annually affirm to the Chief Legal Officer compliance with the requirements of this SFO Code.

## **REPORTING VIOLATIONS OF THIS SFO CODE**

Senior Financial Officers shall report to the Chief Legal Officer, the Disclosure Committee, or the Audit Committee any information he or she may have concerning an actual or suspected violation of this SFO Code. Once a report is made, the firm will conduct a further investigation. All investigations will be conducted under the auspices of the Legal, Ethics & Compliance Department and will be treated in a confidential manner to the extent appropriate under the circumstances. Booz Allen shall comply with all applicable legal and regulatory disclosure and cooperation obligations that apply to its business and will notify the government of wrongdoing as appropriate. A violation of this SFO Code may result in disciplinary action, up to and including termination, as determined by the Board of Directors or the Disciplinary Action Committee, as appropriate. Booz Allen does not tolerate retaliation against any Senior Financial Officer who in good faith makes a report in accordance with this SFO Code, raises a question or concern, or reports suspected misconduct related to the Company's operations or financial reporting.

## **ADDITIONAL REPORTING CHANNELS**

In addition to the Chief Legal Officer and aforementioned governing bodies of the Company, Senior Financial Officers can report any concerns via one of our official reporting channels:

- A member of the Company's Legal, Ethics & Compliance Team
- The Chief Ethics and Compliance Officer
- The Company's Ethics HelpLine (speakup.bah.com; (800) 501-8755)

Booz Allen takes allegations of misconduct seriously, investigates them promptly, and strictly prohibits retaliation against any person who raises a good faith ethical or legal concern.

## **REVISIONS TO THIS SFO CODE**

The Company may revise or supplement this SFO Code at its discretion, provided that this SFO Code, as revised or supplemented, remains in compliance with applicable laws, rules and regulations. Any amendments to this SFO Code will be publicly disclosed as required by applicable law.

## **WAIVERS**

The Audit Committee shall consider any request for a waiver of any provision of this SFO Code, and, if granted, any such waiver shall be publicly disclosed as required by law.

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<sup>1</sup> Effective April 3, 2026, all reporting previously directed to Chief Legal Officer shall be directed to the General Counsel.