



Living Our Values

The Booz Allen Code of
Business Ethics and Conduct



Table of Contents

Message From Our Chairman and CEO.....	3
--	---

Our Purpose & Values	4
----------------------------	---

Our Values

We Live Our Values Every Day.....	6
-----------------------------------	---

Our Actions Reflect Our Values	7
--------------------------------------	---

We Speak Up and Do Not Tolerate Retaliation	8
---	---

Know Where to Go for Help	9
---------------------------------	---

Anonymous Reporting.....	10
--------------------------	----

We Lead by Example

We Lead by Example	12
--------------------------	----

We Care About Our People

We Put People First.....	14
--------------------------	----

We Maintain a Safe and Respectful Workplace	15
---	----

We Protect the Information of Our People	17
--	----

We Conduct Business With Integrity

We Compete for Business Fairly.....	19
-------------------------------------	----

We Do Not Offer or Pay Bribes or Engage in Corrupt Activities.....	20
--	----

We are Responsible with Gifts and Hospitality.....	22
--	----

We Choose Our Suppliers and Other Business Partners Responsibly.....	24
--	----

We Respect Government Employment Restrictions	25
---	----

We Comply With Trade Regulations.....	26
---------------------------------------	----

We Operate Our Business With Integrity

We Accurately Report Time and Expenses	28
--	----

We Avoid Organizational and Personal Conflicts of Interest	29
--	----

We Keep and Maintain Accurate Records	31
---	----

We Protect and Use Assets Responsibly	32
---	----

We Protect Company, Customer, and Third-Party Information	34
---	----

We Use Artificial Intelligence Responsibly.....	36
---	----

We Protect Booz Allen's Image and Reputation.....	37
---	----

We Do Not Engage in Insider Trading or Tipping	39
--	----

We Cooperate With Investigations	41
--	----

We Value Our Role as a Good Corporate Citizen

We Are Committed to Respecting Human Rights.....	43
--	----

We Respect the Political Process.....	44
---------------------------------------	----

We Engage in Our Communities for Social Good	45
--	----

We Are Committed to Environmental Sustainability	46
--	----



Message From Our Chairman and CEO

Our shared purpose and values form the foundation for everything at Booz Allen—our approach to business, our delivery to customers and service to communities, and our connection with each other. These principles unite us, inspire trust, and enable us to address some of the most critical challenges of our time.

For over 11 decades and counting, Booz Allen has been trusted by our customers. Today, as an advanced technology company, we deliver outcomes that power government and commercial organizations. Our unwavering commitment to living our purpose and values is crucial to our continued success.

This Code of Conduct is an important guide to how we work. It covers topics from managing teams and fostering a welcoming, respectful workplace to protecting information, keeping accurate records, and avoiding conflicts of interest. It applies to every employee, emphasizes what is expected of each of us, and describes how we meet those expectations. It also empowers all of us to speak up if we see something inconsistent with our ethics or values. We take every report seriously and strictly prohibit retaliation against anyone who raises concerns in good faith.

It is also important to recognize that our Code of Conduct does not cover every possible situation that we may face. While we have many other resources available to help our people navigate complex situations, it is our values—ferocious integrity, unflinching courage, passionate service, collective ingenuity, and champion's heart—that guide every decision and every action.

Thank you for your ongoing commitment to doing what is right. It takes all of us to build a culture of integrity. Together, we will continue to embody our purpose: empower people to change the world.

A handwritten signature in black ink that reads "Horacio".

Horacio Rozanski
Chairman and CEO

OUR PURPOSE & VALUES

We Empower People to Change the World

FEROCIOUS INTEGRITY

Do right | Hold yourself and
each other accountable

Passionate Service

Embrace the mission
Listen and act with empathy
Make meaningful connections
Build community through generosity

Collective Ingenuity

Find the problem and solve it
Be resourceful and creative
Seek to make the biggest difference
Harness the power of diversity
Be devoted to the team

UNFLINCHING COURAGE

Speak truth to power | Maintain convictions, especially under stress
Bring bold thinking

Champion's Heart

Crave being the best
Bring joy in the pursuit
Learn from failure
Compete with passion

Our Values



We Live Our Values Every Day

Our success comes from living our values every day. Our values reflect both who we are and who we aspire to be, collectively and individually.

This focus on values, operating with integrity, and always complying with the law helps us to attract and retain top talent, provide outstanding service to our customers, and deliver upon our commitment to always doing the right thing.

The Code represents our values in action and serves as a guide for all Booz Allen people (including our employees, corporate officers, Board members, contractors, consultants, and others working on our behalf) on how they should operate on behalf of the company, day in and day out.

We each have a responsibility to:

- Know and live by our values and the Code.
- Think before we speak and act.
- Adhere to our policies and the law.
- Ask for help when we need it.
- Speak up whenever we have questions or concerns about our business or business practices.

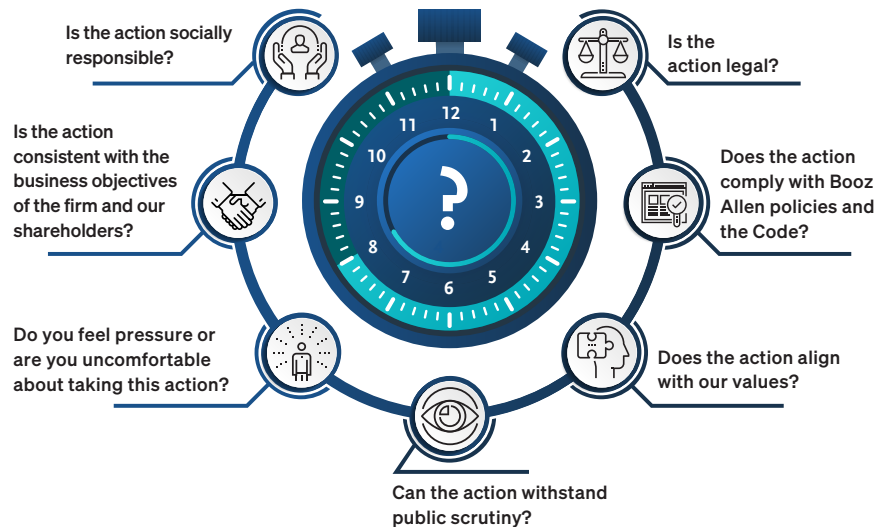
In addition to the expectations set forth above, we expect our managers and leaders to:

- Serve as role models for living our values and complying with the Code.
- Talk with their teams about the importance of operating with integrity in all that we do.
- Be responsive and foster an environment where employees feel comfortable and safe speaking up.
- Escalate questions and concerns when necessary to ensure they are properly addressed.

Our Actions Reflect Our Values

Our values should always guide our behavior to ensure we do what's right.

However, we know that the “right path” is not always easy to see, so if you find yourself in a situation where you're not sure what to do, ask yourself the following questions to help guide your conduct:



If you can answer “yes” to each of these questions, the action is probably okay. If you answered “no,” “maybe,” or “I’m not sure” to any of these questions or if you feel pressured to take an action that does not align with our values, stop and ask for guidance before proceeding. You don’t have to face a difficult situation alone.



We have many resources available to assist you when you have questions or concerns. You should always feel comfortable reaching out to any of the following resources for assistance:

- ✓ Your manager or any senior leader
- ✓ An Ethics Advisor
- ✓ The Ethics & Compliance Team
- ✓ The Legal Department
- ✓ Your Employee Relations or Human Resources team
- ✓ **The Ethics HelpLine** (option to remain anonymous)

We Speak Up and Do Not Tolerate Retaliation

Every employee plays an important role in reinforcing our culture of integrity.

As an employee, it is your duty to raise issues and concerns promptly. Some of the concerns we require you to promptly report are situations where you think or have reason to believe that:

- The law, our Code, or a company policy has been violated.
- Someone's health or safety is at risk.
- There is undue risk (including financial, reputational, and legal risk) to our company.
- The security of sensitive company information, or a third party's sensitive or classified information entrusted to us, may be compromised.

By reporting possible misconduct, we all help contribute to our company's culture of integrity.

We do not tolerate retaliation against anyone for raising a good-faith ethical or legal concern, or for cooperating with an investigation. Anyone who violates our non-retaliation policy is subject to disciplinary action, up to and including termination of employment.

Know Where to Go for Help



The following reporting channels are available to ask your question or raise your concern:

- ✓ Your manager or any senior leader
- ✓ Any member of the Ethics & Compliance Team (ethics@bah.com)
- ✓ Human Resources (HR)
- ✓ Any member of the **Legal Department**
- ✓ The **Chief Ethics and Compliance Officer**
- ✓ Our Ethics Helpline at 800-501-8755 (U.S.) or international, +1-888-475-0009, or <http://speakup.bah.com>. Concerns may be raised anonymously.

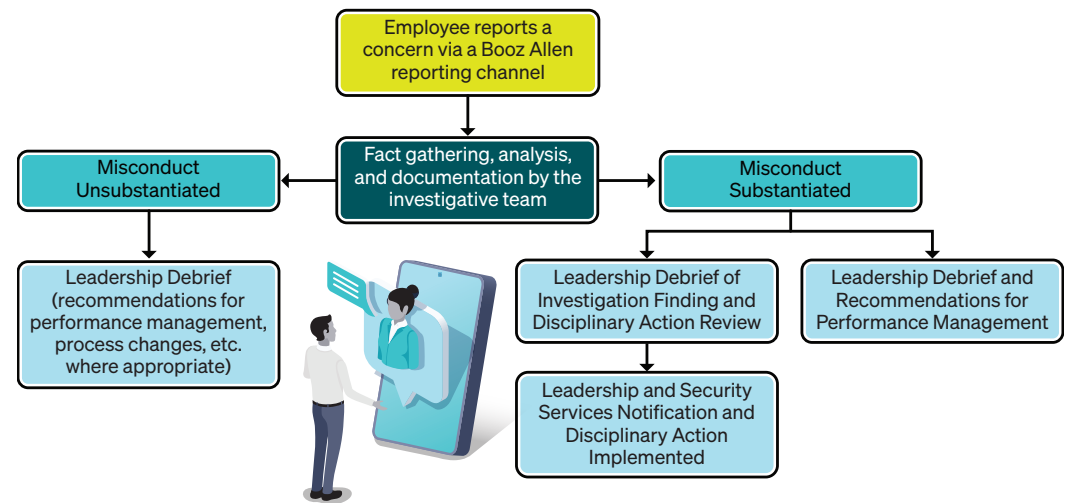


For information security related questions or concerns contact:

- ✓ Cyber Incident Response Team (CIRT) (cirt@bah.com or 703-984-1933) for observed or suspected information security incidents

When concerns are reported promptly, the company is best positioned to investigate the situation and fix any potential problems.

Here's what happens when you report a concern through one of our reporting channels:



When an investigation substantiates that an employee has violated a company policy, leadership is notified, and disciplinary and/or remedial actions are implemented. Disciplinary actions can range from counseling up to termination of employment. Remedial actions may include non-disciplinary coaching for the employee, updating a policy, process or guidance, or other measures designed to prevent recurrence of the violation.

What can retaliation look like?

Retaliation occurs when an employee is subject to adverse action because he or she engaged in a protected activity, including raising a concern.

Retaliation can take many forms, including:

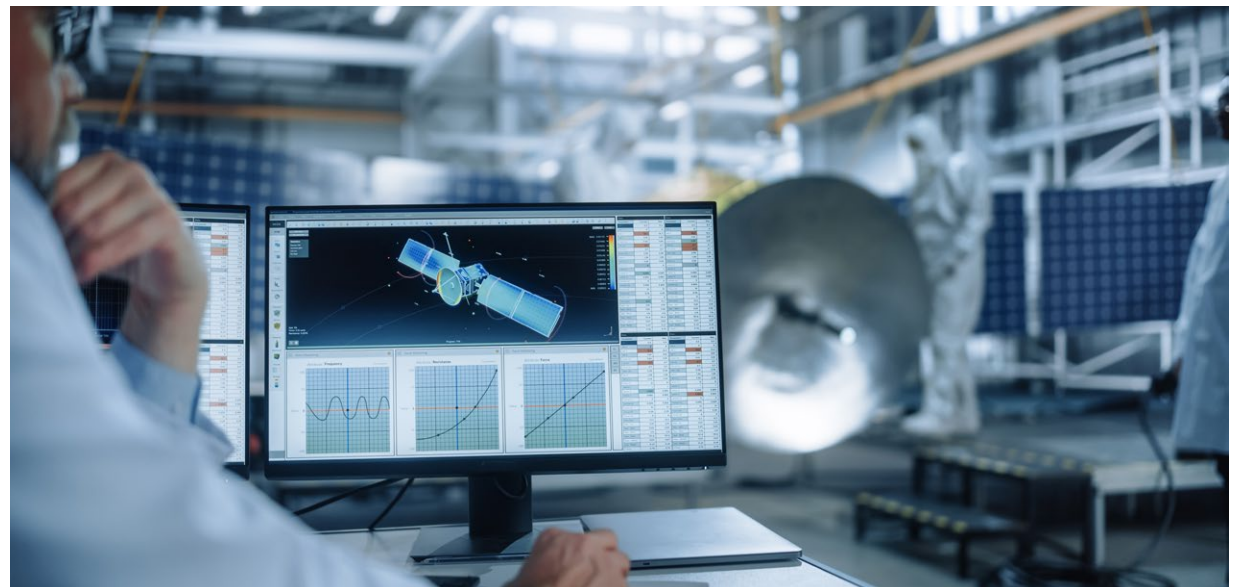
- Demotion
- Firing
- Negative performance assessments
- Reduced salary
- Job reassignment
- Exclusion from meetings
- Threats or harassment

If you believe you have been retaliated against for raising a concern or participating in an investigation, you should immediately report your concerns through any one of our reporting channels so the concern can be promptly investigated.

Anonymous Reporting

When reporting a concern through the Ethics Helpline:

- You may choose to remain anonymous.
- If you choose to report anonymously, you will receive a case number so you can continue to follow up on the status of your concern.
- If you do choose to provide your name, the company investigative team will keep your identity confidential to the greatest extent possible while conducting a thorough investigation.
- We will provide as much information to the reporter as possible, while respecting the confidentiality of the investigation and disciplinary action process.



We Lead by Example

We Lead by Example

WHAT

When it comes to our values and our culture of integrity, we hold our leaders to a higher standard. We require our leaders to serve as role models for living our values every day.

WHY

The words and conduct of our leaders set the tone for the organization.

HOW

By acting with integrity in all that they do, reinforcing and promoting our values, and inspiring others to embrace our Code, our leaders help reinforce the importance of our values in our day-to-day business.

As leaders, we must create a workplace where employees feel comfortable coming forward with questions and concerns, and we must support employees who speak up. We never retaliate against employees for raising legal or ethical concerns in good faith.

If your role involves leading or managing people, we expect you to:

- **Talk About the Code and Our Values:** Read the Code and make ethics conversations a regular part of your routine.
- **Reward Integrity:** Recognize and reward employees for doing the right thing.
- **Be Accountable for Training:** Ensure your team completes mandatory training on time, every time.
- **Know What You Don't Know:** Know where to go for answers when you or your employees have questions that you can't solve on your own.

Q: What should I do if I learn of a concern about an employee in my management chain?

A: It depends. If the matter is performance-related, you are empowered to address the concern as a manager. However, if the concern suggests the employee may have violated the Code or a company policy, you must escalate the matter through a company reporting channel. If you are unsure of how to handle the concern, use a company resource like the People Services team or an Ethics Advisor for guidance.

We Care About Our People

We Put People First

WHAT

We are committed to providing an employee experience that supports engagement & belonging, holistic wellbeing, and opportunities for development.

WHY

Our people first approach cultivates success because it enables us to solve complex problems, enhances our competitive advantage, and fosters employee engagement and belonging.

HOW

We hire, compensate, and promote employees based on their skills, performance, and achievements. We welcome ideas that enable all of us to contribute our best work based on our abilities.

We embrace different experiences and opinions and do not tolerate unlawful harassment, discrimination, or retaliation based on any person's race, color, gender, national origin, religion, sexual orientation, veteran status, disability, marital status, age, gender identity and expression, genetic information, or any other legally protected category.

Booz Allen also participates in certain programs that are designed to attract and retain the best talent for our business and customers and advance equal employment opportunity. These programs are intended to benefit all candidates and employees, including individuals with disabilities and qualified veterans.

We put people first by:

- Speaking up and sharing new ideas, experiences, and opinions.
- Listening with patience and empathy and creating an environment where open dialog thrives.
- Asking questions, respecting answers, and being open to new perspectives.
- Appreciating the unique contributions of others.



We Maintain a Safe and Respectful Workplace

WHAT

We maintain and expect a safe and productive workplace where colleagues treat each other, and those with whom they interact, with respect.

WHY

Everyone deserves a work environment that is safe, secure, and free from inappropriate conduct. This enables us to produce our best work.

HOW

We put our employees' safety first. We maintain thorough safety and health practices across our operations and comply with workplace safety regulations. We do not tolerate—and we take appropriate action against—any inappropriate behavior including but not limited to discrimination, retaliation, intimidation, humiliation, bullying, harassment, violence, or threatening behavior toward colleagues, applicants, customers, or business partners.

What can harassment look like?

Workplace Harassment is verbal or physical conduct that denigrates or shows hostility toward an individual based on their protected status, substantially interferes with an individual's work performance, and creates an intimidating, offensive, or hostile work environment.

Sexual Harassment is any unwelcome sexual advance, request for sexual favors, or other visual, verbal, nonverbal, or physical conduct of a sexual nature. It occurs when such conduct is explicitly or implicitly tied to employment or employment decisions, unreasonably interferes with work performance, or creates an intimidating, hostile, or offensive work environment.

Harassment can take many forms, including:

- Unwelcome threatening, offensive, or hostile conduct.
- Unwanted sexual advances or propositions.
- Making offers of employment benefits in exchange for sexual favors.
- Threatening reprisals after a negative response to sexual advances.
- Visual and verbal conduct such as leering, sexual gestures, displaying of pornographic or sexually suggestive images.
- Making or using sexist remarks or derogatory comments based on gender, innuendos, epithets, slurs, sexually explicit jokes, or lewd or sexual comments.
- Verbal and/or written abuse of a sexual nature.
- Graphic verbal and/or written sexually degrading commentary about an individual's body.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity or expression.
- Unwelcome or inappropriate touching of employees or third parties.
- Interfering with or damaging a person's workstation or equipment, or otherwise interfering with the individual's ability to perform the job or sabotaging an individual's work.

If you witness or experience any of the behaviors above, you should immediately report your concern through any one of the company's reporting channels.

We are committed to a workplace that is free of illegal drugs, including marijuana, and the abuse of legal drugs and alcohol.



Q: One of our customers has been making inappropriate jokes during meetings and making team members feel uncomfortable. Do we still report this even if it's not a concern about an employee?

A: Yes. We want to know about any situation in which an employee feels uncomfortable. We do not tolerate any form of harassment initiated by (or directed at) an employee, customer, or third-party with whom we do business.

We Protect the Information of Our People

WHAT

We safeguard the personal, medical, and financial information of our people.

WHY

We have a legal and ethical responsibility to protect this information.

HOW

We follow all applicable laws and company policies, procedures, and controls that carefully govern how we handle our current, former, and prospective employees' information. We only use or disclose such information for lawful, legitimate business purposes.

What qualifies as personal information?

Personal information refers to any information that can identify an individual, either alone or when combined with other information. Personal information may also be referred to as “personal data,” “personally identifiable information,” or “PII.”

Examples include:

- Name
- Email
- Postal address
- Phone number
- Social Security Number (SSN)
- Geolocation data
- Photo
- Health, employment, education, or financial information

Remember:

Having access to sensitive employee information to perform your job duties does not mean you may use or disclose it outside of the performance of those duties.

Q: Am I allowed to maintain a contact list for my team that includes home addresses, cell phone numbers, birthdays, and emergency contact information?

A: To protect personal information and ensure it is only used for legitimate purposes, only authorized users have access to addresses and other personal information via our HR system. Employees should not maintain a separate file with this information because this could lead to unauthorized sharing or disclosure.

We Conduct Business With Integrity

We Compete for Business Fairly

WHAT

We compete fiercely but fairly with the end goal of winning business and serving our customers based upon the strength of our services and solutions.

WHY

Competing fairly and with integrity allows us to continue our long-standing history of ensuring our customers receive the best services and solutions to meet their needs.

HOW

We provide truthful and accurate information, including any marketing and pricing data, to our customers or prospective customers. We only use, accept, or receive information that is obtained legitimately, and only for the purposes for which it is given. We comply with all applicable procurement integrity rules when bidding on U.S. government contracts, as well as any similar laws in other places around the world where we do business. We do not enter into any agreements that would violate the law, our Code, or our policies.

We never

- Make arrangements with our competitors to unfairly restrain trade.
- Access or use information, such as source selection information or third-party proprietary information, other than for the purpose for which it is provided.
- Exchange proprietary information or make verbal or written agreements that violate the law or that are otherwise anti-competitive.
- Use non-public information obtained by our employees in their prior employment.

We always

- Only gather publicly available information about our competitors.
- Seek to avoid conflicts of interest or the appearance of such conflicts.
- Support fair competition among suppliers when we procure goods and services.
- Maintain the confidentiality of third-party proprietary information or government-sensitive information entrusted to us and use it only for the purposes for which it was given.
- Immediately report the receipt, or inadvertent receipt, of any non-public government information or competitor proprietary information that we are not entitled to use.

Q: A new employee just joined our team. He previously worked for the incumbent on a project that will be up for recompetes soon. Before we decide whether to pursue it, we want to ensure we would be price-competitive. Can I ask him general questions about their project costing methodology if I do not get into “hard facts”?

A: Unless the costing methodology is publicly available, you cannot. Even at a summary level, this would be proprietary information that could give us an unfair advantage and may violate the new employee's duties to his prior employer.

We Do Not Offer or Pay Bribes or Engage in Corrupt Activities

WHAT

We do not offer or pay bribes, give or accept kickbacks, or make facilitation payments.

WHY

Bribery, including even the attempt to bribe, is illegal under U.S. law and the law of other places where we do business. Even the perception of corruption could cause significant reputational and legal damage to our business, in addition to significant financial penalties and possible debarment.

HOW

We comply with anti-bribery and anti-corruption laws wherever we do business, regardless of what local laws may permit.

A bribe can be something other than cash.

A gift, a favor, even an offer of a loan or a job—anything of value—could be considered a bribe if it's offered to improperly influence another party. We can also be held responsible for bribes paid by third parties working for or with us.

As an employee, it's your responsibility to understand what is allowed under our policies and ask for guidance when you need it.

Be Aware of Hidden Bribery Risks

It may sound simple to identify circumstances where there's a risk of paying a bribe. But bribes can take many forms. Consider the following:

- **Working with third-parties:** Set clear expectations and actively monitor the work of third-parties doing business on our behalf. Remember that we could be responsible for their actions.
- **Hiring job candidates:** We hire candidates based on their experience, qualifications, and business need—never as a favor or reward.
- **Making charitable contributions:** We only make charitable contributions or sponsorships based on legitimate business purposes—never as a favor or reward to benefit an individual.



Bribe: We prohibit paying or offering bribes. A bribe is an improper attempt to gain favorable treatment from an organization (like a government agency or customer) by directly or indirectly giving or offering money, gifts, or anything else of value to anyone within that organization in exchange for that business advantage. Bribes are prohibited regardless of whether they are paid to government officials (public-sector bribery) or people affiliated with private-sector companies or organizations (commercial bribery).

Kickback: We prohibit paying or offering kickbacks. A kickback is an improper attempt to obtain or reward favorable treatment by a prime contractor or a subcontractor related to a U.S. government contract by directly or indirectly paying or offering any money, gift, or anything else of value to the company or its employees in exchange for that favorable treatment.

Facilitation Payment: We prohibit paying or offering facilitation payments. A facilitation payment is a small payment made to a government official to speed up routine government actions necessary to deliver benefits our company is entitled to like processing paperwork, delivering mail, installing phones, or turning the power on.

Money Laundering: We do not engage money laundering or other illegal activities. Money laundering is taking money or assets obtained through criminal activity and converting it into assets that appear legitimate. We must stay vigilant for “red flags” like requests from a customer or supplier to make payments in cash or from a non-business account or other unusual payment terms.



We are Responsible with Gifts and Hospitality

WHAT

We value the relationships we've built with our customers, suppliers, and other business partners and must ensure that these relationships remain positive and ethical. We ensure these relationships are never influenced by offers of inappropriate gifts or business courtesies.

WHY

When people exchange gifts, meals, or other business courtesies, it can create the perception that the giver is trying to improperly influence business decisions. In addition, many of our stakeholders are subject to stringent regulations and policies that set rules for what they can offer or accept.

HOW

We compete on the strengths of our products and services and do not give gifts or business courtesies to gain an unfair competitive advantage.

We always follow our and the third party's guidelines to identify the circumstances under which an offer or acceptance is okay, and when it's not.

We follow our policies, which outline pre-approval thresholds and articulate special restrictions that may prohibit gifts and business courtesies in certain circumstances. For example, we have different rules for commercial and government business. If our business partners have more restrictive rules on what they can give or accept, we follow those rules in our interactions with them.



Keys to Responsibly Giving and Receiving Business Courtesies

Sometimes knowing what you can give or accept from a customer or supplier can be confusing. Keep these key concepts in mind when considering giving gifts or business courtesies:

Who: Different rules apply in different situations. Make sure the gift is permitted by law and is in accordance with the policies of both the giver and receiver.

What: Gifts must be reasonable, given infrequently, and should never be cash or cash equivalents (like gift cards). You should always ensure that the gift or business courtesy satisfies a reasonable business purpose and that the gift is not for the purpose of seeking favorable treatment or influencing decision making.

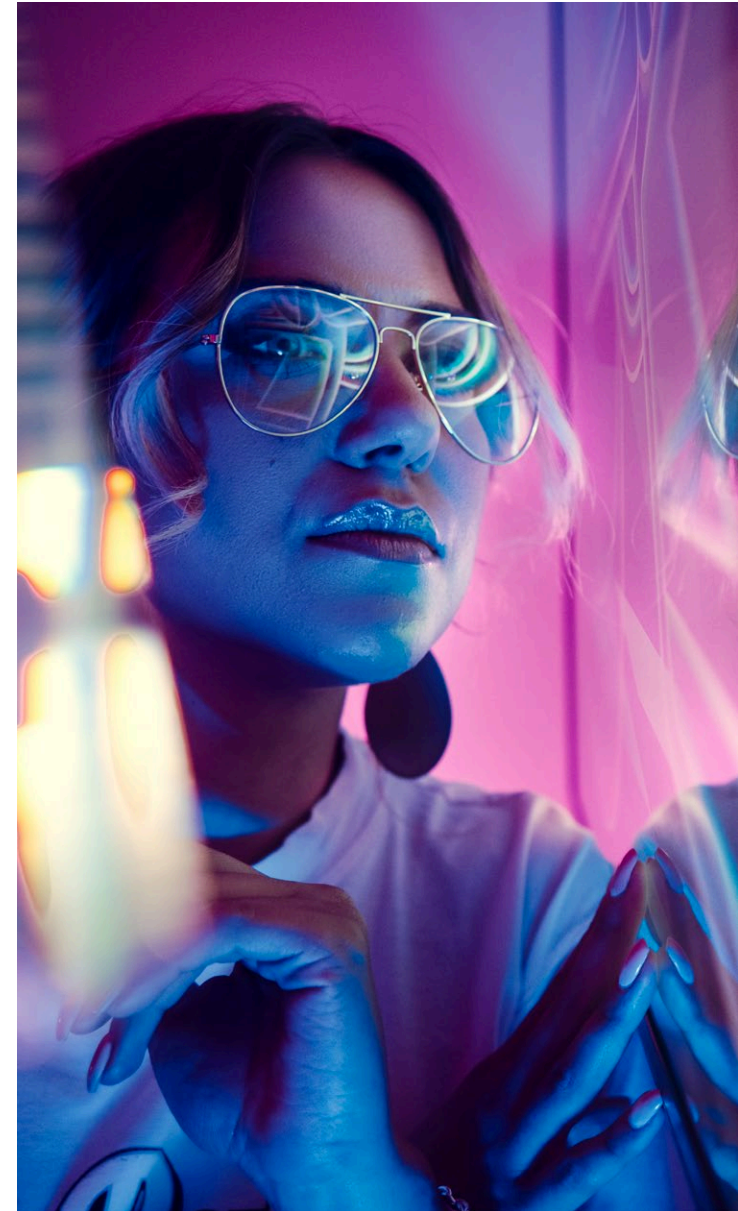
Refer to our policies or contact ethics@bah.com if you have questions.

Q: I want to provide a gift to a few U.S. government employees I worked with on a project that recently ended. I would like to give each of them a “thank you” card with a \$15 AMEX gift card inside. Is this gift allowed?

A: “Use anywhere” gift cards are the equivalent of cash and are prohibited under our policy. Also, providing gifts to U.S. government employees always requires special care and consideration. As best practice, seek guidance through management channels, your account-aligned attorney, or ethics@bah.com, before providing gifts to USG employees that are beyond modest food items (e.g., shared coffee/snacks at a meeting) or modest tokens (e.g., greeting card).

Q: A vendor that we have previously engaged and is currently providing services to our company invited me to a playoff game. Can I accept the tickets and attend the game?

A: Lavish offers from third parties should always give you pause. In this scenario, you would be required to get pre-approval from the Legal team.



We Choose Our Suppliers and Other Business Partners Responsibly

WHAT

We engage with suppliers and other business partners who commit to operating in a manner consistent with our values and in compliance with the law.

WHY

By partnering with organizations that share our values, we help ensure that we live our value of ferocious integrity every day, and reduce the possibility of legal issues and reputational harm to the company.

HOW

We choose our business partners and make procurement decisions objectively, based on factors such as quality, service, price, availability, and reliability. We strive to partner with organizations who share our commitment to integrity, sustainability, and the people supporting that work.

We conduct appropriate, risk-based due diligence of potential business partners and follow company procedures when engaging third parties.

We communicate our expectations through tailored contractual provisions, including, where appropriate, a commitment to comply with our Supplier Code of Conduct. We raise our concerns through the appropriate channels if the actions of a third-party do not adhere to our values or create undue risk for the company.



We Respect Government Employment Restrictions

WHAT

We follow all applicable laws and restrictions when engaging current and former government employees for hire and when staffing current employees who were previously employed by the government.

WHY

As a government contractor, we are required to comply with these laws and restrictions. In addition, doing so promotes transparency and avoids creating conflicts of interest for the company.

HOW

We do not engage current government employees in employment discussions until a company recruiter has verified that they have disqualified themselves from decisions directly impacting our business. We follow specific steps set forth in the company's policy on hiring current government employees and staffing current employees with post-government employment restrictions.



Remember:

- There may be restrictions on the roles and responsibilities that a former government employee may perform for us.
- Certain government employees must obtain written guidance on their restrictions from a designated agency ethics official (e.g., a DAEO letter) prior to hire.
- These rules can be complex, so be sure to connect with Talent Acquisition or Ethics & Compliance for additional guidance.

We Comply With Trade Regulations

WHAT

We comply with trade regulations that prohibit business with certain countries, organizations, or individuals, and that require government authorization for cross-border activities involving sensitive items or technologies.

WHY

Trade regulations protect global security and stability. These laws ensure that sensitive or potentially dangerous products or technologies are not used to support proliferation, terrorism, violations of human rights, or other activities that jeopardize the safety of civilian populations around the world.

HOW

We do not do business in countries that are subject to comprehensive sanctions programs. We screen our business partners, employee candidates, and other third parties against government watchlists to ensure we do not hire or do business with the parties on those lists.

We monitor the company's acquisition, development, and transfer of technology to understand the specific export controls that apply. We do not engage in cross-border activities that involve export-controlled technologies such as defense and intelligence, information security, or other technologies with critical military or intelligence applications unless we have the appropriate government authorization.

We do not cooperate with any boycott that is not U.S. government-sanctioned. We do not agree to any request by a customer or third party for information about our business activities related to Israel, or any attempt to require Booz Allen to refuse to do business with anyone because of any boycott against Israel. We also report these requests to the U.S. government.

Remember:

- Identify any cross-border activities in your opportunities and contracts so they can be reviewed for trade compliance risk.
- Seek approval for all cross-border transfers of company equipment, even when you're taking your devices on vacation.
- Secure sensitive information uploaded to company networks to prevent unauthorized access.
- Keep sensitive items and information in an Export-Restricted or Cleared facility.

Reach out to the **Trade Compliance team** with any questions about international trade compliance requirements.



We Operate Our Business With Integrity

We Accurately Report Time and Expenses

WHAT

We only incur and charge actual and reasonable expenses for necessary business purposes and accurately record our time.*

*where required

WHY

Accurate time and expense reporting is required for us to properly account for our time and expenses, invoice our customers, and recognize revenue.

HOW

We follow our company policy on time reporting, including accurately recording time spent on work activities using the appropriate charge code, submitting time reports on schedule, and requiring verification by managers of the accuracy of reports before approving them. In addition, we follow our company policy on expense reporting, including accurately reporting and documenting our business expenses.

Q: My manager directed me to charge the customer fewer hours than I worked. Is this okay?

A: No. All time spent on work activities must be recorded and charged accurately. If you feel uncomfortable with the direction you've received from a manager, reach out through a company reporting channel to discuss your situation.

Q: My manager has been submitting receipts for reimbursement that I don't believe have any business justification. What should I do? I'm certain my manager will know it's me if I say something.

A: You should report your concern. It's always difficult when you suspect a manager might be violating a policy, but our values and mandatory reporting policy require us to do so. The company has many reporting channels to raise concerns; pick the one you feel most comfortable with so that we can conduct a proper investigation. If you suspect you are being retaliated against because you raised your concerns, report those concerns immediately so the appropriate team can help you navigate the situation and ensure compliance with our non-retaliation policy.



We Avoid Organizational and Personal Conflicts of Interest

WHAT

We don't allow personal interests to affect business decisions made on behalf of the company. We never use corporate property, information, or position for personal opportunity or gain, or to compete with the company.

WHY

When making decisions related to our business, we have a duty to act in the company's best interests and avoid even the appearance of a conflict.

HOW

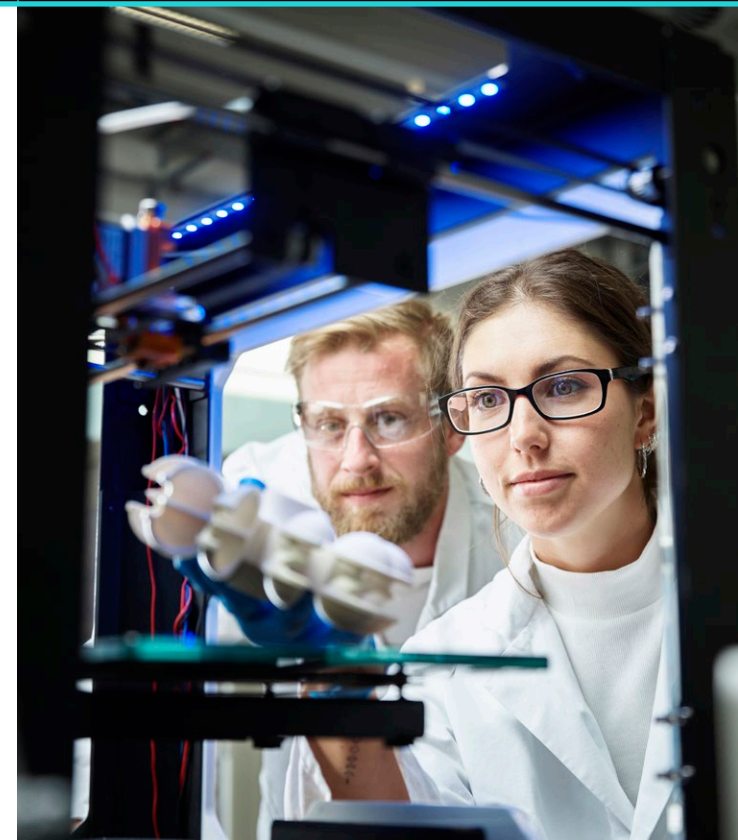
When we find ourselves in situations that either intersect with or impact company business or our ability to perform our jobs objectively, we promptly disclose these situations.

We comply with all laws, regulations, and U.S. government contracting rules regarding conflicts of interest.

Certain customer contracts require us to disclose financial or other personal interests. When required, we make these disclosures fully and accurately, and update them as required.

Examples of potential individual conflicts of interest include:

- Having a personal, romantic, or familial relationship with someone in your direct reporting chain or with someone whose work you indirectly oversee or influence.
- Having personal or familial financial interests with an entity that competes with or does business with our company.
- Having secondary or outside employment with an entity that competes with or does business with our company or performing the type of work you perform for our company.
- Holding an outside advisory or board position.
- Engaging in outside speaking activities or authoring works related to our company or the work you perform for our company.



Q: I'd like to make some extra money by working on weekends; do I have to disclose this to the company?

A: It depends. Many part-time activities do not require disclosure or prior approval (e.g., Uber driver, retail sales, food service, home improvement/landscaping jobs), provided that the work and time commitment do not occur during core working hours, and do not interfere with your availability for work or job performance. It is always best to inform your manager and consult the Individual Conflicts of Interest policy for additional guidance.

Some secondary employment opportunities will require approval from HR and your leadership, so please check the policy, and where required, complete a secondary employment disclosure form.

Q: I've been approached to sit on the board of another company. Do I need to seek approval from someone at the company prior to accepting this position?

A: Yes. You should inform your manager and contact Ethics & Compliance to perform a review of the situation. Sometimes, participation on other companies' boards could be a conflict; we will look at the type of company, the services it provides, and any impact it may have on your responsibilities with our company.



We Keep and Maintain Accurate Records

WHAT

We're all responsible for creating and maintaining accurate records and for ensuring that we keep these records in the right place and for the right amount of time. We never misrepresent, falsify, alter, or improperly destroy data, records, or other information, or allow others to do so.

WHY

Reliable business records enable us to make informed business decisions for the benefit of our company, our shareholders, and our customers in accordance with our Records Retention schedule and applicable laws and regulations.

HOW

We have policies, procedures, and controls that govern our information, from creation and handling, to access and security, to proper disposal and destruction.

We follow all retention instructions of Legal Hold notices. Such notices supersede (and are given priority over) any conflicting retention schedule.

What is a corporate record?

A **corporate record** is any recorded information, regardless of format, which is made, received, or retained by our company in connection with company business. Examples of records include contracts, customer presentations, financial spreadsheets, time records, internal memorandums, investor reports, personnel files, and photographs.

Consider These Possible Scenarios:

"I don't care how you do it. Just make the numbers work."

"This contract is maxed out; charge these costs to a different contract."

"Don't put that in writing. I don't want any record of this conversation."

Hearing comments like these? Stop and seek help. If it sounds improper or unethical, it probably is.



We never

- Falsely report time worked or charge time to an inappropriate charge code.
- Misstate financial information in our records.
- Alter numbers to meet productivity goals.
- Misrepresent our capabilities or services to win work.

We Protect and Use Assets Responsibly

WHAT

We properly use and protect the company's, our business partners', customers', and other third-parties' assets that have been entrusted to us including information technology resources, materials, facilities, and equipment.

WHY

Access to these assets maximizes our ability to conduct business in a competitive, productive, and efficient manner. We are thankful for and respectful of these opportunities and recognize that we have a responsibility to protect these assets.

HOW

We do not use these assets for anything other than a legitimate business purpose and in accordance with the company's policies and any applicable contract terms.

We never allow unauthorized parties, including family members, to access our company's or others' assets, and we take appropriate steps to protect against inadvertent access. We understand that we have no expectation of privacy when using the company's or others' assets.

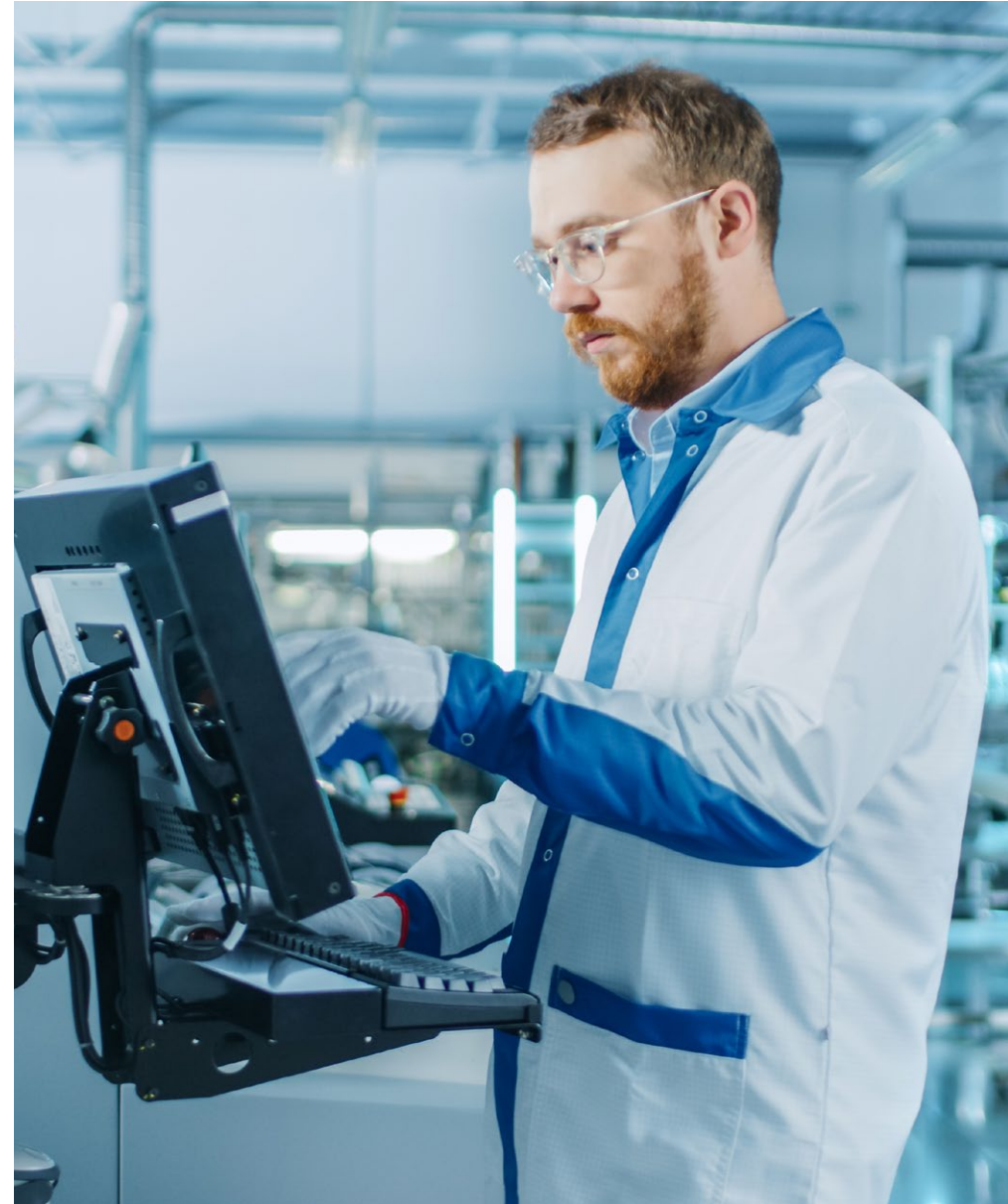


Q: I would like to send work to my personal email address so I can view it on a personal device and print it out at home. Am I allowed to do so?

A: No. Company and customer work must only be viewed on the company's approved information technology devices. Sending work to a personal email address is not permitted and could create a security risk.

Q: A senior leader asked for my help in organizing a fundraiser to benefit a charity she supports that is not sponsored by our company. She will be inviting everyone from the office to attend, and she will be hosting it in our conference space. Is this an appropriate use of company assets?

A: No. Even though well-intentioned, these actions would constitute a misuse of company assets. You should let this leader know that you cannot assist her in this capacity. If you feel uncomfortable telling her "no," you should consult with your manager or raise the issue through another company reporting channel.



We Protect Company, Customer, and Third-Party Information

WHAT

We protect all information entrusted to us, whether it belongs to our company, a business partner, a customer, or other third party. This includes the company's intellectual property and capital assets, our business partners', and customers' information, including U.S. government classified and controlled unclassified information and other information entrusted to us by third parties. We use this information only for authorized business purposes. We do not use or share information learned through our work or through Booz Allen's relationships with customers and third parties for personal financial gain or to benefit another person. This includes using such information to make or influence bets, wagers, event contracts, prediction-market positions, securities trades, or similar transactions.

WHY

Information is a valuable asset, no matter who the information belongs to. And we must be vigilant in protecting it. Our customers entrust information to us that is essential to national security and global stability. Because of the importance of this information and its relationship to the overall success of our business, all information owned by or entrusted to our company must be handled with necessary care.

HOW

We exercise great care and follow robust company procedures when we create, handle, access, use, secure, and dispose of information.

We follow all information security rules when utilizing any computer-enabled device or when we communicate with others inside or outside of our company.

We maintain robust counterintelligence and insider-threat programs to detect and prevent unauthorized access to company and customer information.

We require employees to maintain their obligation to protect all information entrusted to them during their employment and after they leave the company, even when the company assets and copies of information are returned (as required).



Q: A colleague referenced work he is doing on behalf of a U.S. government customer in a social media post. What should I do?

A: If you feel comfortable, you can raise the concern to the employee and let them know that it is against company policies to discuss customer projects outside of work. Regardless of whether you speak to the employee directly, you should also report the concern through one of the company's reporting channels.

Q: When I started my new role, I signed an agreement concerning intellectual property and the protection of company information. Does this still apply when I leave the company to pursue other career opportunities?

A: Yes. You must adhere to the restrictions on disclosing company or customer information, even after your employment concludes. Unless such information is publicly available, you cannot freely discuss customer or company business when you move on in your career.

Q: While working on site, I heard someone say that there would be a military operation in an unusual location. I don't know if the person who said it was speculating or knew it for a fact. Later, I saw a wager on Polymarket about whether there would be a military operation at the same location; can I make a bet if I use my personal account and personal device?

A: No. You may not use information learned through your Booz Allen work for personal financial gain or to benefit someone else, even if you aren't sure if it is true. This applies even if the platform is public, the amount is small, you use a personal device, or the information does not relate to Booz Allen.



We maintain a robust insider threat and counterintelligence operation to protect U.S. government information. Even with these tools at our disposal, it is important for our employees to remain vigilant in detecting potential security risks and promptly reporting them.

We Use Artificial Intelligence Responsibly

WHAT

We are committed to the lawful and ethical development and use of Artificial Intelligence (AI) tools and systems. We believe AI systems should be measurably effective and mission enhancing.

WHY

We want to unlock the immense potential AI provides to our customers, partners and people in an efficient, reliable, and trustworthy way.

HOW

We integrate AI responsibly by adhering to a set of guiding principles that lead our development, deployment, and use of AI technologies. We actively review, assess, and manage risk in deployed AI systems and encourage our customers to adopt similar practices as methods, contexts, risks, and needs evolve over time. This includes applying human intervention as an alternative to AI where appropriate to protect the public from harmful impacts.

We believe that responsible AI practices enable our organization and customers to meet modern global challenges. We believe that harnessing the power of AI—safely, securely, and transparently—is one of the great transformative opportunities of this generation.

We hold ourselves accountable for adherence to the following guiding principles in our AI design, development, deployment, and use. AI systems must be:

- Ethical
- Accountable and Transparent
- Safe, Secure, and Verified
- Robust and Reliable
- Accurate and Intentional
- Lawful and Respectful of Our Rights and Democratic Values
- Explainable and Interpretable
- Managed, Monitored, and Governed



We Protect Booz Allen's Image and Reputation

WHAT

We protect our image and reputation so that we can preserve and build upon our goodwill and enhance the overall success of the company.

WHY

We value the trust of our people, customers, and communities, which form the bedrock of goodwill and our overall success. For 11 decades and counting, we have built a reputation as a well-respected and trusted advisor to our customers. We are proud of this reputation; our image is what our customers, business partners, and the world perceive us to be. It represents who we are and our belief that we can empower people to change the world.

HOW

We ensure that information shared about our company is consistent, accurate, and complete. We all represent a single Booz Allen brand, and we follow the company's policies when using the company's name or brand.

We seek the proper approvals for any use of the company's name or image including use by a third party, at a tradeshow or event, public speaking engagements, media interviews, or authoring any works such as a book or an article.

Our public communications are accurate and preserve confidentiality commitments to our customers, employees, and third parties. As an employee, you may be approached by reporters, bloggers, or other media outlets. You should not engage with reporters regarding matters that relate to the company or its business unless authorized to do so. If you receive a media inquiry, promptly contact the Media Relations team.

We are thoughtful when engaging on social media and understand that our personal and professional images are linked. We indicate that our personal opinions are our own and do not necessarily reflect the views of the company. We follow our company policies and guidelines on sharing information and setting up social media accounts representing or referring to the company. We never post any content that could be reasonably viewed as malicious, slanderous, obscene, threatening, retaliatory, intimidating, or that might constitute discrimination, harassment, or bullying.



Q: I want to set up a social media account to promote a new product we're marketing. Do I need to obtain approval?

A: Yes. If you plan to use a social media account to conduct company business, contact Media Relations (mediarelations@bah.com) for information on the review process.

Q: A colleague wrote an offensive social media post that would violate our policies if they said it at work. Do I have an obligation to report this?

A: Yes. We are required to follow company policies at or outside of work, including on social media. Use one of the company's reporting channels to raise your concern so the company can investigate. Remember, the company does not tolerate retaliation against anyone for raising a good-faith ethical or legal concern that someone is violating a policy or the law.

Q: A third-party supplier wants to use the company logo to promote the company's use of a product. Can I send the supplier our logo?

A: No. We do not permit third-party suppliers to use our logo to promote the company's use of a product or service. Please contact the Brand team (brand@bah.com) with any questions.

Q: I have an upcoming speaking engagement, and my bio references my employment. Do I need to obtain approval?

A: Yes. Any publication or speaking engagement that will mention company affiliation, customers, or relevant subject matter must be approved by your leadership and Media Relations. Contact Media Relations (mediarelations@bah.com) for more information.

Remember:

You are a Booz Allen employee 24/7, whether you are at home, a company or customer office, a happy hour, on vacation, or on social media. We are accountable for our personal and professional conduct, both inside and outside of work.

We Do Not Engage in Insider Trading or Tipping

WHAT

We do not directly or indirectly purchase or sell securities of the company, its affiliates, or any other company, or enter into event contracts while in possession of material nonpublic information concerning our company or any other company.

WHY

Complying with the laws and regulations regarding the trading of securities promotes a fair and open market for not only our people and our shareholders, but for all market participants. Our compliance with these laws is not only mandatory, but critical in our role as a publicly traded company.

HOW

We do not disclose non-public information in our possession to anyone outside the company including family or friends, in a social setting or public place, or on social media.

We provide all current and prospective investors with equal access to material information concerning our business and financial performance. We do not trade securities during periods when trading is restricted.

All contact with investors and analysts is handled by our Investor Relations group. We do not respond to individual inquiries from the investment community unless specifically asked to do so by an authorized individual in the Investor Relations group.

Additionally, using or sharing any nonpublic information learned through your employment with Booz Allen or through Booz Allen's relationships with our customers or other third parties for your own financial gain or for the benefit of another person is prohibited, regardless of materiality. This includes not only securities transactions, but also event contracts, prediction-market positions, betting platforms, or similar arrangements where the information could provide an unfair advantage.



Q: How do I know if I'm a designated insider?

A: Employees who are identified as likely to have access to material non-public information in connection with carrying out their duties are considered “designated insiders.”

Examples of designated insiders are members of the Board of Directors; all partners, vice presidents, and their executive assistants; all employees of the Legal Department and Corporate Finance Integrated and Analysis Management Forecasting and Planning; and senior- and director-level employees in Information Services, People Services, Finance, and Corporate Development and Strategy groups.

Q: What is material non-public information?

A: Information is material if it would be likely to affect a company's stock price or the outcome of a relevant event or contract, or if it would be important to a reasonable investor in deciding whether to buy, hold, or sell that company's securities. Information is generally not public unless it has been disclosed in a press release, in a public filing, in materials provided to shareholders broadly, or is available through a news wire service or daily newspaper of wide circulation.

Material non-public information can include earnings reports, merger or acquisition targets, bid or price proposal information, customer contract status, and pending legal outcomes. In the context of government and defense work, material non-public information may also include information regarding military operations, national security matters, government contract awards, or similar events or outcomes.

If you are unsure whether information is either material or non-public, contact the Corporate Team at ethics@bah.com.



We Cooperate With Investigations

WHAT

We cooperate fully with internal and government investigations and other government oversight related to our business.

WHY

Transparency and cooperation are keys to our success in maintaining our reputation as a highly ethical organization.

HOW

We provide complete, honest, and thorough information related to an investigation, audit, or review, even if doing so means revealing violations of policy by ourselves or others. We preserve all documents, data, and other materials related to any matter that is subject to government or internal investigation, audit, or review.

Government oversight can include audits, floor checks, and investigations and can involve techniques to obtain information including subpoenas, search warrants, interviews, and informal requests for information. When responding to these government requests, we are cooperative, truthful, and as accurate as possible.

If we are contacted by a representative of the government or a third-party investigator or asked to provide any company property, documents, or information external to the company, we promptly contact the Legal Department.



We Value Our Role as a Good Corporate Citizen

We Are Committed to Respecting Human Rights

WHAT

We honor and celebrate human rights. We condemn human trafficking and slavery, forced labor, and child labor, and do not engage in these activities within the company or tolerate them in our supply chain.

WHY

Human rights are the most fundamental rights that we have and are at the heart of our purpose and values. We join the global community in promoting and respecting human rights and acting to stop actions that infringe on these rights.

HOW

Our robust global policies, procedures, programs, and practices reflect our strong commitment to human rights, corporate citizenship, and fair labor conditions, with a focus on those human rights that are most salient to our business.

We are deeply committed to treating our people fairly.

We respect our employees' rights to discuss and agree to terms and conditions of employment without coercion and to freely terminate their employment. We ensure that our employees are of legal working age for their position and have a safe, healthy, and respectful workplace. We are committed to putting our people first, and to the availability of benefits, health coverage, and natural disaster relief for our people.

In addition to the resources provided in our Code, employees may report any suspected trafficking activity to the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

We demonstrate our commitment to protecting human rights by:

- Supporting and promoting employee well-being.
- Creating a work environment that is free of harassment, discrimination, and retaliation.
- Promoting fair competition.
- Engaging in responsible sourcing.
- Taking actions to identify and detect human rights violations in our supply chains through risk-based due diligence.
- Undertaking only compliant human subject research.
- Protecting the environment and supporting our communities.

We Respect the Political Process

WHAT

We respect the political process and our employees' rights to participate in it in their personal time, and we uphold our responsibilities when engaging in political and lobbying activities on behalf of the company.

WHY

We support an active and fair political process that provides an opportunity for everyone to have a voice.

HOW

We comply with campaign finance and lobbying laws. Our policies explain how to identify any conflicts of interest, including those that may arise as part of participating in the political process as individuals or as an enterprise, and when and how to disclose the conflict.

Employees are encouraged to engage in personal political activities on their own time using only their own resources and are not permitted to use the company's name, association, or resources for political purposes.

As a company, we join a select number of trade associations in support of our strategic business objectives. Employees can maintain individual trade association memberships so long as the association and employee activities comply with company policies. Any direct engagement in their lobbying activities on behalf of the company must be approved by Government Relations.

We avoid engaging in political activities on behalf of our customers. We do not lobby on behalf of the U.S. government. We do not testify on behalf of a U.S. government agency, draft testimony for its officials to deliver, respond to questions or correspondence from U.S. Congress, or draft agency responses to U.S. government audits, unless these activities are included in the scope of work for a customer as a part of responding to Congressional oversight of the executive branch.

We do not contribute company funds to any political party, committee, or candidate for federal office. The Booz Allen Hamilton Inc. PAC is a voluntary, nonpartisan organization that operates in accordance with U.S. campaign finance laws. It is funded by voluntary contributions from eligible employees and family members, directors, and stockholders.



We Engage in Our Communities for Social Good

WHAT

We contribute to the communities where we live and work and use our resources to change the world.

WHY

We care about our people and the communities where they live and work, supporting communities through the generosity of our business, and the collective ingenuity of our employees.

HOW

We encourage all employees to be actively involved in the community through volunteerism. We do so by working through established groups within our company, participating in company-sponsored activities, and encouraging contributions to charitable, educational, or civic organizations. We also engage in community impact activities as a company, providing services to eligible organizations free of charge and supporting charitable causes through philanthropic partnerships.

When engaging in activities in our communities for social good, we have an obligation to protect the company's reputation and appropriately set expectations with the organizations we serve as volunteers by following brand and volunteerism policies.

We promote employee engagement by offering opportunities to engage, both personally and through company-sponsored partnerships. We offer valuable opportunities for our people to learn, develop skills and capabilities, and enhance their visibility both within the company and our communities.



We Are Committed to Environmental Sustainability

WHAT

We endeavor to reduce our impact on the environment through conservation efforts related to our energy consumption, greenhouse gas emissions, water use, and waste generation.

WHY

We have a responsibility as a corporate citizen to make a positive impact in building a more sustainable society.

HOW

We comply with all applicable environmental laws and regulations and operate in a manner that incorporates leading practices such as greenhouse gas reduction measures, efficient use of resources, and minimizing waste generation. We develop innovative and sustainable solutions for our customers to help address global challenges while promoting responsible consumption of resources in operating our business.





Waiver of the Code or Policy

Our Code represents our values in action and applies to all employees, corporate officers, members of our Board of Directors, contractors, consultants, and others working on our behalf. Waivers of our Code are strongly disfavored. Any waiver of our Code for directors or officers (which is only necessary in rare instances where there is a clear benefit to the company in granting the waiver) must be approved by the Board of Directors or its duly authorized committee and shall be disclosed promptly to the company's shareholders.

It isn't just about the words on these pages. It's about our actions every day. We will only be able to raise the integrity bar if we rigorously hold ourselves and one another accountable for living our values and complying with the Code. The long-term success of our company, our culture and our customers will best be secured if we allow integrity, our values and the Code to guide our decisions and we make it a priority to promptly speak up any time we have questions or concerns.

Thank you for doing your part to contribute to our culture of integrity.