

DEFENCE COMPANIES INDEX (DCI) ON ANTI-CORRUPTION AND CORPORATE TRANSPARENCY 2020

FINAL ASSESSMENT

BOOZ ALLEN HAMILTON INC.

The following pages contain the detailed scoring for this company based on publicly available information.

The table below shows a summary of the company's scores per section:

Section	Number of Questions*	Score Based on Publicly Available Information
1. Leadership and Organisational Culture	4	7/8
2. Internal Controls	6	6/12
3. Support to Employees	7	7/14
4. Conflict of Interest	4	4/8
5. Customer Engagement	7	7/14
6. Supply Chain Management	5	5/10
7. Agents, Intermediaries and Joint Ventures	10	6/20
8. Offsets	4	0/8
9. High Risk Markets	4	6/8
10. State-Owned Enterprises	0	N/A
TOTAL		48/102
BAND		D

*This column represents the number of questions on which the company was eligible to receive a score; i.e. where the company did not receive a score of N/A.

1. Leadership and Organisational Culture

Question
1.1. Does the company have a publicly stated anti-bribery and corruption commitment, which is authorised by its leadership?
Score
1
Comments
<p>There is evidence that the company's Chief Executive Officer makes a statement in support of ethical business conduct, and endorses the company's Code of Business Ethics and Conduct. This document contains the company's zero-tolerance stance toward bribery and corruption.</p> <p>However, the company receives a score of '1' because the public statement from its leadership does not specifically mention and address bribery and corruption.</p>
Evidence
<p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf <p>[p.3] MESSAGE FROM HORACIO</p> <p>Our shared purpose and values form the foundation for everything else at Booz Allen—our approach to business, our service to clients and support to communities, and our interaction with each other. This has been true for more than a century. The people of our firm understand the direct link between Booz Allen's long-standing success and our unwavering commitment to living our values each day.</p> <p>That's why we made a deliberate choice to focus on behaviors and actions when we defined a purpose statement for the firm and updated the way we described our values. Our purpose is to empower people to change the world, and our values are ferocious integrity, unflinching courage, passionate service, collective ingenuity, and a champion's heart. They come alive in how we deliver to clients and run our business, including our steadfast commitment to firm policies and regulations.</p> <p>This Code of Conduct, setting expectations for the respect we all should have for our colleagues and our firm, is an important guide on a variety of topics, from managing teams and fostering a healthy workplace to protecting information, keeping accurate records, and avoiding conflicts of interest. It emphasizes what is expected of the firm and each of us, why it matters, and how we meet those expectations. We can each take from this resource concrete ways to live our values, and in doing so, continue to demonstrate what it means to Be Booz Allen today and well into the future.</p> <p>Horacio Rozanski President and Chief Executive Officer</p> <p>[p.15] We have zero tolerance for corruption. We follow all applicable laws, Booz Allen policy, and the recipient's policies when giving or receiving gifts. We never give gifts to win work or to gain an improper advantage and never accept gifts that are meant to improperly influence us.</p> </p>

Question
1.2. Does the company have a comprehensive anti-bribery and corruption policy that explicitly applies to both of the following categories: a) All employees, including staff and leadership of subsidiaries and other controlled entities; b) All board members, including non-executive directors.
Score
2
Comments
<p>There is evidence that the company publishes a clear anti-bribery and corruption policy, which prohibits bribery, payments to public officials, commercial bribery and facilitation payments. This policy explicitly applies to all employees and directors, including those of subsidiaries and other controlled entities.</p>
Evidence
<p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf <p>[p.6] And while we comply with all applicable laws—this is true wherever we work around the world— complying with the law is just the beginning. We also demand that our actions, and those of our colleagues and others we do business with, reflect our values, even when it's difficult.</p> <p>Our Code represents these values in action and applies to all employees, officers, directors, contractors, consultants, and others working on our behalf.</p> <p>[p.14] WE CONDUCT OUR BUSINESS ETHICALLY</p> <p>[p.15] We have zero tolerance for corruption</p> <p>WHAT</p> <p>We have zero tolerance for corruption. We follow all applicable laws, Booz Allen policy, and the recipient's policies when giving or receiving gifts. We never give gifts to win work or to gain an improper advantage and never accept gifts that are meant to improperly influence us.</p> <p>WHY</p> <p>We conduct our business with integrity and win work only on the strength of our services and solutions. We have zero tolerance for bribery and corruption, and avoid or mitigate actual and perceived conflicts of interest or the appearance of impropriety. We require all organizations acting on our behalf to do the same.</p> <p>HOW</p> <p>Our policies expressly forbid bribery and include specific procedures for how and when our people may give or receive a gift or business courtesy. We also rigorously vet our business partners to ensure they share our high ethical standards and we require prompt disclosure of any potential conflict of interest.</p> <p>[3] Anti-Corruption Policy Summary (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/anti-bribery-corruption.pdf <p>[p.1] Anticorruption and Anti-Bribery</p> <p>INTRODUCTION</p> <p>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</p> </p> </p>

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

[16] 10K Annual Report 2019 (Document)

Accessed 10/09/2019

<https://investors.boozallen.com/static-files/30f6e790-55d5-4ef5-868d-3602c3f66eed>

[p.26] In addition, we are subject to the U.S. Foreign Corrupt Practices Act, or the FCPA, and other laws that prohibit improper payments or offers of payments to foreign governments and their officials and political parties by business entities for the purpose of obtaining or retaining business.

[17] Code of Ethics for Senior Financial Officers (Document)

Accessed 23/04/2020

<https://investors.boozallen.com/static-files/cd226a59-a136-496e-a80c-de218ef5590b>

[p.1] CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

Booz Allen Hamilton Holding Corporation (together with its subsidiaries, the "Company") has adopted this Code of Ethics for Senior Financial Officers (the "Code"). The Code supplements the Booz Allen Hamilton Code of Business Ethics and Conduct (the "Green Book"), 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 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.

Question
1.3. Does the board or a dedicated board committee provide oversight of the company's anti-bribery and corruption programme?
Score
2
Comments
There is evidence that the board level Audit Committee is ultimately responsible for the oversight of the company's anti-bribery and corruption programme. This includes reviewing reports from management on the programme's performance, along with the results of internal and external audits.
Evidence
<p>[4] Ethics and Compliance at Booze Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html Driven by accountable leadership and supported across the firm Our board of directors (through the audit committee) and the chief ethics & compliance officer, supported by leadership at all levels, oversee and are accountable for our commitment to compliance and ethical conduct and the ethics & compliance program. This includes providing effective tone-at-the top messaging and adequate resources. The chief ethics and compliance officer reports to and educates the audit committee in person twice annually and additionally as needed on our key compliance areas and initiatives, including risk assessment and audit findings.</p> <p>[19] Audit Committee Charter (Document) Accessed 23/04/2020 https://investors.boozallen.com/static-files/34b24f1b-1a1c-4a97-b7ce-e1c218955476 [p.1] Purpose</p> <p>The purpose of the Committee is: (a) to assist the Board with its oversight responsibilities to the shareholders, potential shareholders, the investment community, and others (as appropriate) relating to: (i) the quality and integrity of the Company's financial statements; (ii) the Company's compliance with legal and regulatory requirements, including the effectiveness of the Company's internal control over financial reporting;</p> <p>[...]</p> <p>The Committee's responsibility is limited to oversight.</p> <p>[p.8] Other powers and responsibilities</p> <p>[...]</p> <p>20. The Committee shall: (i) regularly review the Company's Code of Business Ethics and Conduct (the "Code of Ethics") and management's maintenance thereof to ensure that it reflects the highest standards of integrity and ethical and moral business conduct and all applicable rules and regulations; (ii) recommend any changes to the Code of Ethics to the Board for approval; and (iii) review management's monitoring of the Company's compliance with the Code of Ethics. In addition, the Committee shall evaluate whether management is setting the appropriate tone at the top by communicating the importance of ethical behavior and the guidelines for acceptable business practices.</p>

Question
1.4. Is responsibility for implementing and managing the company's anti-bribery and corruption programme ultimately assigned to a senior executive, and does he or she have a direct reporting line to the board or board committee providing oversight of the company's programme?
Score
2
Comments
There is evidence that a designated senior executive has ultimate responsibility for implementing and managing the company's anti-bribery and corruption programme. It is clear that this person has a direct reporting line to a board committee that provides oversight of the anti-bribery and corruption programme. There is evidence of reporting and feedback activities between this person and the board committee.
Evidence
<p>[4] Ethics and Compliance at Booz Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html Driven by accountable leadership and supported across the firm Our board of directors (through the audit committee) and the chief ethics & compliance officer, supported by leadership at all levels, oversee and are accountable for our commitment to compliance and ethical conduct and the ethics & compliance program. This includes providing effective tone-at-the top messaging and adequate resources. The chief ethics and compliance officer reports to and educates the audit committee in person twice annually and additionally as needed on our key compliance areas and initiatives, including risk assessment and audit findings.</p> <p>[18] Chief Legal Officer Corporate Biography (Webpage) Accessed 23/04/2020 https://www.boozallen.com/e/bio/leadership/nancy-laben.html Nancy Laben is an executive vice president and the chief legal officer at Booz Allen. She oversees ethics and compliance, and the legal department, as well as corporate affairs, which spans a number of functions including corporate governance, government contract law, employment law, securities law, litigation, investigations, government relations, media relations, corporate social responsibility, and marketing and communications. She is also a member of the firm's leadership team and on the board of the Booz Allen Foundation.</p>

2. Internal Controls

Question
2.1. Is the design and implementation of the anti-bribery and corruption programme tailored to the company based on an assessment of the corruption and bribery risks it faces?
Score
2
Comments
<p>There is evidence that the company has a formal bribery and corruption risk assessment procedure that informs the design of its anti-bribery and corruption programme, and that the results of risk assessments are reviewed by the board on at least an annual basis or when the results of the risk assessments reveal significant findings. The company states that the results of such reviews are used to develop tailored mitigation plans and to update specific parts of the company's anti-bribery and corruption programme.</p>
Evidence
<p>[4] Ethics and Compliance at Booze Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html Driven by accountable leadership and supported across the firm Our board of directors (through the audit committee) and the chief ethics & compliance officer, supported by leadership at all levels, oversee and are accountable for our commitment to compliance and ethical conduct and the ethics & compliance program. This includes providing effective tone-at-the top messaging and adequate resources. The chief ethics and compliance officer reports to and educates the audit committee in person twice annually and additionally as needed on our key compliance areas and initiatives, including risk assessment and audit findings.</p> <p>Informed through regular risk assessments Ethics & Compliance coordinates with our enterprise risk management and business teams to proactively identify new compliance risks and conduct comprehensive risk assessments and benchmarking exercises regularly for our key and emerging compliance risk areas. This enables us to identify requirements and risk, determine whether the program is designed to address these requirements and risks, and assess whether the program is operating as designed. Risks identified during these assessments are addressed through tailored program enhancements.</p> <p>[1] Anti-Corruption and Anti-Bribery Compliance Programme Homepage (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics/anticorruption-and-anti-bribery-compliance-program.html Our Anticorruption and Anti-Bribery compliance program is designed to identify and address corruption risks that may arise based on business activities in which we engage, geographies in which we operate, and industries and clients we serve. As the larger business and geopolitical context changes, we stay attuned to shifts in laws, regulations, and enforcement practice. Key program focus areas include:</p> <p>[...]</p> <ul style="list-style-type: none"> • Creating an annual, tailored anticorruption training course for all employees and using a risk-based approach to deliver targeted training to those more likely to be exposed to potential corruption risks. • Monitoring changes to our business for corruption risk and enhancing controls to mitigate risk and meet requirements <p>[19] Audit Committee Charter (Document) Accessed 23/04/2020 https://investors.boozallen.com/static-files/34b24f1b-1a1c-4a97-b7ce-e1c218955476 [p.6] (d) The Committee shall periodically review and discuss the Company's guidelines and policies with respect to the process by which the Company undertakes risk assessment and risk management, including, but not limited to, discussions regarding significant financial risk exposures, enterprise risk management (unless otherwise discussed by the Board), cybersecurity systems and related security risks, regulatory updates and educational sessions presented to the Committee that address risk issues.</p>

Question
2.2. Is the company's anti-bribery and corruption programme subject to regular internal or external audit, and are policies and procedures updated according to audit recommendations?
Score
1
Comments
<p>The company states that its anti-bribery and corruption programme is subject to regular audit and review, the results of which are presented to the board.</p> <p>However, the company receives a score of '1' because it does not specify that the entire programme is audited to ensure that it is consistent with high standards of best practice and the business risks facing the company.</p>
Evidence
<p>[4] Ethics and Compliance at Booze Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html Booz Allen's Ethics & Compliance program ensures the firm and our people engage in and promote ethical behavior and comply with laws and regulations in all jurisdictions where we operate.</p> <p>[...]</p> <p>Our Ethics & Compliance programs share a common framework to help us achieve our objectives:</p> <p>[...]</p> <p>Routinely monitored and audited to ensure appropriate response We conduct regular compliance monitoring activities to systematically evaluate our programs, monitor trends, and provide independent review to ensure appropriate programmatic and specific response.</p>

Question
2.3. Does the company have a system for tracking, investigating and responding to bribery and corruption allegations or incidents, including those reported through whistleblowing channels?
Score
1
Comments
<p>There is evidence that the company publicly commits to investigating incidents, and there is a specific procedure in place to deal with whistleblowing cases. There is also evidence that all investigations are documented and that whistleblowers are provided updates on the outcome of investigations, if they so wish. There is evidence that investigations are handled by an independent team.</p> <p>However, the company does not provide information covering the whole investigative process, from receipt to final outcome, and there is no evidence that a central body reviews the status of investigations on an annual or regular basis.</p>
Evidence
<p>[4] Ethics and Compliance at Booz Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html All Booz Allen employees are required to report legal or ethical concerns through established firm reporting channels. When notified of a concern, the firm follows our detailed investigative protocols to investigate each allegation of misconduct fully and fairly and assesses and imposes discipline for misconduct. Where appropriate, the firm discloses misconduct to regulatory authorities and escalates issues to senior leadership and the Board of Directors.</p> <p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf <p>[p.9] If you have an ethical or legal question or concern, you should feel safe asking your question or raising your concern and confident that appropriate action will be taken. When you ask a question, you'll get an answer. When a concern is raised, the firm will promptly conduct an investigation that is confidential, impartial, and respectful. You should ask your question or raise your concern to any of these resources:</p> <ul style="list-style-type: none"> -Your career or job manager or a more senior leader -An Ethics Advisor -Any member of Ethics & Compliance -The appropriate Business Partner or ESG resource, for example: <ul style="list-style-type: none"> • Your HR Talent Consultant or Employee Relations • The Cyber Incident Response Team (CIRT) (703-984-1933) for observed or suspected information security incidents • Security Services for security or safety concerns • Government Accounting Compliance for time reporting matters -Any member of the Legal Department -The Chief Ethics and Compliance Officer -Our Ethics Helpline at 800-501-8755 (US) or international, +1-888-475-0009, or http://speakup.bah.com. Concerns may be raised anonymously. <p>[21] External Whistleblowing Website - FAQs (Webpage) Accessed 23/04/2020 https://secure.ethicspoint.com/domain/media/en/gui/38732/faq.html#q6 Frequently Asked Questions</p> <p>[...]</p> </p>

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsFirst Line secure server to prevent any possible breach in security. These reports are available only to a very limited number of individuals within the firm (for example, the Ethics and Business Integrity Office, Law Department, Employee Relations, etc.) who are charged with evaluating and responding to the report based on the type of violation. Each of these report recipients has had training in keeping these reports in the utmost confidence.

[...]

What if I remember something important about the incident after I file the report? Or what if the firm has further questions for me concerning my report?

When you file a report using the EthicsFirst Line site or through the EthicsFirst Line Call Center, you receive a unique user name and are asked to choose a password. You can return to the EthicsFirst system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a firm representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer questions that may have been left for you. You and the firm now have entered into an "anonymous dialogue" where situations are not only identified but can also be resolved, no matter how complex.

[22] External Whistleblowing Site (Webpage)

Accessed 23/04/2020

<https://secure.ethicspoint.com/domain/media/en/gui/38732/index.html>

EthicsFirst

Report a Concern

Ask a Question

Follow up on a report or question

[17] Code of Ethics for Senior Financial Officers (Document)

Accessed 23/04/2020

<https://investors.boozallen.com/static-files/cd226a59-a136-496e-a80c-de218ef5590b>

[p.2] Reporting Violations of this Code

Senior Financial Officers shall report to the Chief Legal Officer any information he or she may have concerning an actual or suspected violation of this Code. Once a report is made, the firm will conduct a further investigation. All investigations will be conducted under the auspices of the Legal 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.

Question
2.4. Does the company have appropriate arrangements in place to ensure the quality of investigations?
Score
0
Comments
There is no publicly available evidence that the company assures itself of the quality of investigations, for example by indicating that staff conducting investigations are properly trained, by implementing a policy to handle complaints about the process or by reviewing the investigation process every three years.
Evidence
<p>[4] Ethics and Compliance at Booz Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html All Booz Allen employees are required to report legal or ethical concerns through established firm reporting channels. When notified of a concern, the firm follows our detailed investigative protocols to investigate each allegation of misconduct fully and fairly and assesses and imposes discipline for misconduct. Where appropriate, the firm discloses misconduct to regulatory authorities and escalates issues to senior leadership and the Board of Directors.</p> <p>[21] External Whistleblowing Website - FAQs (Webpage) Accessed 23/04/2020 https://secure.ethicspoint.com/domain/media/en/gui/38732/faq.html#q6 Frequently Asked Questions</p> <p>[...]</p> <p>Where do these reports go? Who can access them? Reports are entered directly on the EthicsFirst Line secure server to prevent any possible breach in security. These reports are available only to a very limited number of individuals within the firm (for example, the Ethics and Business Integrity Office, Law Department, Employee Relations, etc.) who are charged with evaluating and responding to the report based on the type of violation. Each of these report recipients has had training in keeping these reports in the utmost confidence.</p>

Question
2.5. Does the company's investigative procedure include a commitment to report material findings of bribery and corruption to the board and any criminal conduct to the relevant authorities?
Score
2
Comments
The company commits to report material findings of bribery and corruption to the board. There is evidence that the company's Chief Legal Officer is responsible for ensuring that the disclosure of criminal offences to relevant authorities is evaluated and acted upon if necessary.
Evidence
<p>[4] Ethics and Compliance at Booz Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html All Booz Allen employees are required to report legal or ethical concerns through established firm reporting channels. When notified of a concern, the firm follows our detailed investigative protocols to investigate each allegation of misconduct fully and fairly and assesses and imposes discipline for misconduct. Where appropriate, the firm discloses misconduct to regulatory authorities and escalates issues to senior leadership and the Board of Directors.</p> <p>[17] Code of Ethics for Senior Financial Officers (Document) Accessed 23/04/2020 https://investors.boozallen.com/static-files/cd226a59-a136-496e-a80c-de218ef5590b [p.2] Reporting Violations of this Code</p> <p>Senior Financial Officers shall report to the Chief Legal Officer any information he or she may have concerning an actual or suspected violation of this Code. Once a report is made, the firm will conduct a further investigation. All investigations will be conducted under the auspices of the Legal 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.</p> <p>[16] 10K Annual Report 2019 (Document) Accessed 10/09/2019 https://investors.boozallen.com/static-files/30f6e790-55d5-4ef5-868d-3602c3f66eed [p.12] Some significant laws and regulations that affect us include the following:</p> <ul style="list-style-type: none"> • the Federal Acquisition Regulation (the "FAR"), and agency regulations supplemental to the FAR, which regulate the formation, administration, and performance of U.S. government contracts. For example, FAR 52.203-13 requires contractors to establish a Code of Business Ethics and Conduct, implement a comprehensive internal control system, and report to the government when the contractor has credible evidence that a principal, employee, agent, or subcontractor, in connection with a government contract, has violated certain federal criminal laws, violated the civil False Claims Act, or has received a significant overpayment; <p>[18] Chief Legal Officer Corporate Biography (Webpage) Accessed 23/04/2020 https://www.boozallen.com/e/bio/leadership/nancy-laben.html Nancy Laben is an executive vice president and the chief legal officer at Booz Allen. She oversees ethics and compliance, and the legal department, as well as corporate affairs, which spans a number of functions including corporate governance, government contract law, employment law, securities law, litigation, investigations, government relations, media relations, corporate social responsibility, and marketing and communications. She is also a member of the firm's leadership team and on the board of the Booz Allen Foundation.</p>

Question
2.6. Does the company publish high-level results from incident investigations and disciplinary actions against its employees?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption investigations or disciplinary actions.
Evidence
No evidence found.

3. Support to Employees

Question
3.1. Does the company provide training on its anti-bribery and corruption programme to all employees across all divisions and geographies, and in all appropriate languages?
Score
1
Comments
<p>There is evidence that the company provides training for all employees, which outlines the basic principles of its anti-bribery and corruption programme.</p> <p>However, there is no clear publicly available evidence that the company's training specifically includes the whistleblowing options available to employees. It is also not clear from publicly available information that it provides this training to all employees in all divisions, countries and regions of operation and in all appropriate languages.</p>
Evidence
<p>[4] Ethics and Compliance at Booze Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html Engagement through training and awareness We empower our employees to identify, escalate, and mitigate risks through a mix of firmwide and targeted audience training and awareness. We rely heavily on real-world scenarios and regularly adjust our approach based on participant feedback and industry best practices.</p> <p>[1] Anti-Corruption and Anti-Bribery Compliance Programme Homepage (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics/anticorruption-and-anti-bribery-compliance-program.html How we stay ahead of corruption risks</p> <p>[...]</p> <p>Creating an annual, tailored anticorruption training course for all employees and using a risk-based approach to deliver targeted training to those more likely to be exposed to potential corruption risks.</p> <p>[16] 10K Annual Report 2019 (Document) Accessed 10/09/2019 https://investors.boozallen.com/static-files/30f6e790-55d5-4ef5-868d-3602c3f66eed [p.13] The U.S. government may revise its procurement practices or adopt new contract rules and regulations at any time. To help ensure compliance with these laws and regulations, all of our employees are required to attend ethics training at least annually, and to participate in other compliance training relevant to their position.</p>

Question
<p>3.2. Does the company provide tailored training on its anti-bribery and corruption programme for at least the following categories of employees:</p> <p>a) Employees in high risk positions, b) Middle management, c) Board members.</p>
Score
1
Comments
<p>There is evidence that the company provides tailored anti-bribery and corruption training for employees in high risk positions based on their exposure to possible corruption risk.</p> <p>However, there is no clear public available evidence that the company provides tailored anti-corruption training to those in middle management positions and to board members, nor is there clear evidence that employees in high risk positions specifically must undertake and refresh their tailored training on at least an annual basis.</p>
Evidence
<p>[1] Anti-Corruption and Anti-Bribery Compliance Programme Homepage (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics/anticorruption-and-anti-bribery-compliance-program.html How we stay ahead of corruption risks</p> <p>[...]</p> <p>Creating an annual, tailored anticorruption training course for all employees and using a risk-based approach to deliver targeted training to those more likely to be exposed to potential corruption risks.</p> <p>[4] Ethics and Compliance at Booz Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html Engagement through training and awareness We empower our employees to identify, escalate, and mitigate risks through a mix of firmwide and targeted audience training and awareness.</p> <p>[16] 10K Annual Report 2019 (Document) Accessed 10/09/2019 https://investors.boozallen.com/static-files/30f6e790-55d5-4ef5-868d-3602c3f66eed [p.13] The U.S. government may revise its procurement practices or adopt new contract rules and regulations at any time. To help ensure compliance with these laws and regulations, all of our employees are required to attend ethics training at least annually, and to participate in other compliance training relevant to their position.</p>

Question
3.3. Does the company measure and review the effectiveness of its anti-bribery and corruption communications and training programme?
Score
1
Comments
<p>There is evidence that the company reviews its anti-bribery and corruption communications and personnel training programme, the results of which are used to update specific parts of the company's anti-bribery and corruption communications and training programme.</p> <p>However, it is unclear whether reviews of the training programme are carried out on at least an annual basis.</p>
Evidence
<p>[4] Ethics and Compliance at Booze Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html Engagement through training and awareness We empower our employees to identify, escalate, and mitigate risks through a mix of firmwide and targeted audience training and awareness. We rely heavily on real-world scenarios and regularly adjust our approach based on participant feedback and industry best practices.</p>

Question
3.4. Does the company ensure that its employee incentive schemes are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
0
Comments
There is no publicly available evidence that the company's incentive schemes incorporate ethical or anti-bribery and corruption principles.
Evidence
No evidence found.

Question
3.5. Does the company commit to and assure itself that it will support and protect employees who refuse to act unethically, even when it might result in a loss of business?
Score
1
Comments
<p>There is publicly available evidence that the company commits to support employees who raise concerns, make ethical decisions and refuse to act unethically, even when situations are difficult in the conduct of business.</p> <p>However, there is no publicly evidence that the company assures itself of its employees' confidence in this commitment through surveys, usage data, or other clearly stated means.</p>
Evidence
<p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.6] Our Code represents these values in action and applies to all employees, officers, directors, contractors, consultants, and others working on our behalf.</p> <p>[p.8] If we are faced with a situation where we are uncertain about what to do, we don't guess—we ask. If we see something that we think, or have a good reason to suspect, may violate the law, our Code or a firm policy, puts at risk an individual's health or safety, causes undue risk to our firm, or jeopardizes the security of sensitive firm information or a third party's sensitive or classified information entrusted to us, we have a mandatory duty to raise our concern.</p> <p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.6] And while we comply with all applicable laws—this is true wherever we work around the world— complying with the law is just the beginning. We also demand that our actions, and those of our colleagues and others we do business with, reflect our values, even when it's difficult.</p> <p>[p.14] WE CONDUCT OUR BUSINESS ETHICALLY</p> <p>[p.15] WHY</p> <p>We conduct our business with integrity and win work only on the strength of our services and solutions. We have zero tolerance for bribery and corruption, and avoid or mitigate actual and perceived conflicts of interest or the appearance of impropriety. We require all organizations acting on our behalf to do the same.</p>

Question
3.6. Does the company have a clear policy of non-retaliation against whistleblowers and employees who report bribery and corruption incidents?
Score
1
Comments
<p>The company promotes a clear policy of non-retaliation against both whistleblowers and employees who report bribery and corruption incidents, which explicitly applies to all employees across the organisation, including those employed by the group as third parties, suppliers and joint venture partners.</p> <p>However, there is no publicly evidence evidence that the company assures itself of its employees' confidence in this commitment through surveys, usage data, or other clearly stated means.</p>
Evidence
<p>[6] Mandatory Reporting and Non-Retaliation Policy (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/Mandatory-Reporting-and-Non-Retaliation.pdf [p.1] Speaking up is not only required at Booz Allen, but it is critical and safe. Raising concerns allows us to protect our people, firm, reputation, and business. We do not tolerate retaliation against anyone who, in good faith, asks a question or raises an ethical or legal concern.</p> <p>The purpose of this policy is to set forth the mandatory reporting requirements for all Booz Allen people, the additional reporting obligations for Booz Allen people who hold U.S. government security clearances, and to clearly set forth Booz Allen's zero tolerance for retaliation, including the protection for Booz Allen people under U.S. whistleblowing laws.</p> <p>SUMMARY OF POLICY</p> <p>Booz Allen's Mandatory Reporting and Non-Retaliation policy covers all of the following content in detail:</p> <p>[...]</p> <ul style="list-style-type: none"> • Clearly establishes the firm's zero tolerance policy for retaliation • Explains whistleblower protections provided under U.S. laws • 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 <p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.6] Our Code represents these values in action and applies to all employees, officers, directors, contractors, consultants, and others working on our behalf.</p> <p>[p.8] If we are faced with a situation where we are uncertain about what to do, we don't guess—we ask. If we see something that we think, or have a good reason to suspect, may violate the law, our Code or a firm policy, puts at risk an individual's health or safety, causes undue risk to our firm, or jeopardizes the security of sensitive firm information or a third party's sensitive or classified information entrusted to us, we have a mandatory duty to raise our concern. We have zero tolerance for retaliation against anyone who raises an ethical or legal concern in good faith, asks a question, or cooperates with an investigation. Anyone who violates our non-retaliation policy is subject to disciplinary consequences, up to or including termination of employment.</p> <p>[17] Code of Ethics for Senior Financial Officers (Document) Accessed 23/04/2020 https://investors.boozallen.com/static-files/cd226a59-a136-496e-a80c-de218ef5590b</p>

[p.2] Booz Allen does not tolerate retaliation against any Senior Financial Officer who in good faith makes a report in accordance with this Code, raises a question or concern, or reports suspected misconduct related to the Company's operations or financial reporting.

[5] Recruiting, Hiring and Employee Referral Policy Summary (Document)

Accessed 04/09/2019

https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/Recruiting-and-Hiring.pdf

[p.1] The purpose of this policy is to set forth the requirements for recruiting and hiring someone to work at the firm, including employee referrals and the referral bonus incentive.

SUMMARY OF POLICY

Booz Allen's Recruiting, Hiring and Employee Referral policy covers all of the following content in detail:

[...]

- 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

[21] External Whistleblowing Website - FAQs (Webpage)

Accessed 23/04/2020

<https://secure.ethicspoint.com/domain/media/en/gui/38732/faq.html#q6>

I am concerned that if I file a Report or participate in an investigation, I will be retaliated against. What will the firm do to protect me from any type of retaliatory action?

Booz Allen does not tolerate retaliation against any employee who in good faith raises a question or concern or reports suspected misconduct related to the firm's business or the conduct of any of its directors, officers, employees, clients, suppliers, or subcontractors. Our commitment to non-retaliation is a cornerstone of our EthicsFirst Program. It assures you that in posing any question, raising any concern, or reporting misconduct, you will not suffer any negative consequences for doing so—period. Anyone who violates the firm's Non-Retaliation Policy is subject to disciplinary consequences, up to or including termination of employment.

Question
3.7. Does the company provide multiple whistleblowing and advice channels for use by all (e.g. employees and external parties), and do they allow for confidential and, wherever possible, anonymous reporting?
Score
2
Comments
<p>There is evidence that the company provides both whistleblowing and advice channels for its employees to report concerns and seek advice on its anti-corruption programme. The company clearly indicates that these channels allow for both confidential and anonymous reporting. In addition, there is evidence that the company operates both internal reporting mechanisms as well as an external whistleblowing service operated by an independent third party. There is also evidence indicating that these channels are available to all employees in any country of operation, in multiple languages, and to any employees of third parties, suppliers and joint venture partners.</p>
Evidence
<p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf <p>[p.9] If you have an ethical or legal question or concern, you should feel safe asking your question or raising your concern and confident that appropriate action will be taken. When you ask a question, you'll get an answer. When a concern is raised, the firm will promptly conduct an investigation that is confidential, impartial, and respectful. You should ask your question or raise your concern to any of these resources:</p> <ul style="list-style-type: none"> -Your career or job manager or a more senior leader -An Ethics Advisor -Any member of Ethics & Compliance -The appropriate Business Partner or ESG resource, for example: <ul style="list-style-type: none"> • Your HR Talent Consultant or Employee Relations • The Cyber Incident Response Team (CIRT) (703-984-1933) for observed or suspected information security incidents • Security Services for security or safety concerns • Government Accounting Compliance for time reporting matters -Any member of the Legal Department -The Chief Ethics and Compliance Officer -Our Ethics Helpline at 800-501-8755 (US) or international, +1-888-475-0009, or http://speakup.bah.com. Concerns may be raised anonymously. <p>When we learn of an employee's concern, we report the matter promptly and do not attempt to investigate or resolve the matter on our own. We should not raise our concerns to someone who we think might be involved in potential misconduct, and we keep confidential any concerns raised. Anyone who raises an ethical or legal concern is treated respectfully and fairly, and we keep their identity confidential to the greatest extent possible. We treat any employee who is the subject of an investigation, or subject to discipline, respectfully and fairly.</p> <p>[21] External Whistleblowing Website - FAQs (Webpage) Accessed 23/04/2020 https://secure.ethicspoint.com/domain/media/en/gui/38732/faq.html#q6 <p>If I see a violation, do I have to report it? What if I'm not comfortable doing so?</p> <p>Whenever you observe any behavior, or you have good reason to suspect behavior or actions may be a violation of the Green Book, any firm policy, or a law or regulation, you are required to report it. You should bring any concerns forward to your career or job manager or member of leadership, or any of the other reporting avenues as outlined in the Green Book. We recognize, however, that there may be circumstances when you are not comfortable having your name associated with a report. In such circumstances that you can use the EthicsFirst Line to make your report anonymously. We would rather you report anonymously than keep the information to yourself.</p> <p>[23] Whistleblowing Report Submission (Webpage) Accessed 23/04/2020</p> </p></p>

https://secure.ethicspoint.com/domain/en/report_information.asp?locationid=-1&clientid=38732&override=yes&agreement=no&companyname=Booz%20Allen%20Hamilton&violationtypeid=27360

Location where incident occurred:

[...]

State/Province:

[...]

Country:

[...]



* What is your relationship to Booz Allen Hamilton?

- Select One -
- Select One -
Booz Allen Hamilton employee
Booz Allen Engineering Services employee
ASE employee
Client
Subcontractor/Company
Former Booz Allen Hamilton employee
Your Other

* Do you

☐ Yes

If you

, please complete the following:

First Name

Your

Your E-mail Address:

[...] Do you wish to remain ANONYMOUS for this report? Yes No

[17] Code of Ethics for Senior Financial Officers (Document)

Accessed 23/04/2020

<https://investors.boozallen.com/static-files/cd226a59-a136-496e-a80c-de218ef5590b>

[p.2] Reporting Violations of this Code

Senior Financial Officers shall report to the Chief Legal Officer any information he or she may have concerning an actual or suspected violation of this Code. Once a report is made, the firm will conduct a further investigation. All investigations will be conducted under the auspices of the Legal 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.

[6] Mandatory Reporting and Non-Retaliation Policy (Document)

Accessed 04/09/2019

https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/Mandatory-Reporting-and-Non-Retaliation.pdf

[p.1] Speaking up is not only required at Booz Allen, but it is critical and safe. Raising concerns allows us to protect our people, firm, reputation, and business. We do not tolerate retaliation against anyone who, in good faith, asks a question or raises an ethical or legal concern.

The purpose of this policy is to set forth the mandatory reporting requirements for all Booz Allen people, the additional reporting obligations for Booz Allen people who hold U.S. government security clearances, and to clearly set forth Booz Allen's zero tolerance for retaliation, including the protection for Booz Allen people under U.S. whistleblowing laws.

SUMMARY OF POLICY

Booz Allen's Mandatory Reporting and Non-Retaliation 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
- Establishes the firm's mandatory reporting channels
- Sets forth the requirements for all employees to report legal or ethical concerns, potential insider risks or threats, and arrests, charges, convictions and regulatory actions, and to promptly escalate any matter reported to them as appropriate
- Sets forth additional reporting requirements for employees who hold U.S. government security clearances
- Clearly establishes the firm's zero tolerance policy for retaliation
- Explains whistleblower protections provided under U.S. laws
- 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
- Points of contact and additional resources

[22] External Whistleblowing Site (Webpage)

Accessed 23/04/2020

<https://secure.ethicspoint.com/domain/media/en/gui/38732/index.html>

العربية English Русский

EthicsFirst

Booz | Allen | Hamilton

Report a Concern

Ask a Question

Follow up on a report or question

Code of Business Ethics & Conduct

Frequently Asked Questions



4. Conflict of Interest

Question
4.1. Does the company have a policy defining conflicts of interest – actual, potential and perceived – that applies to all employees and board members?
Score
2
Comments
<p>There is evidence that the company formally addresses conflicts of interest as a corruption risk and that it covers actual, potential and perceived conflicts. The company's policy clearly applies to all employees and board members, including those of subsidiaries and other controlled entities. In addition, there is evidence that the company's policy addresses possible conflicts arising from personal financial interests, personal relationships and outside employment, and that it addresses government relationships.</p>
Evidence
<p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.6] Our Code represents these values in action and applies to all employees, officers, directors, contractors, consultants, and others working on our behalf.</p> <p>[p.19] We Respect Post-Government Employment Restrictions</p> <p>WHY As a U.S. Government contractor, we are required to comply with these laws and restrictions. In addition, doing so promotes transparency and avoids creating a conflict of interest for the firm and our people who were former U.S. Government employees.</p> <p>[p.23] WHAT We prohibit actual or perceived conflicts of interest that interfere with the interests of the firm, or that make it difficult for our people to perform their work objectively and effectively.</p> <p>WHY Booz Allen is committed to delivering objective, independent, and unbiased advice and assistance to clients.</p> <p>HOW When we find ourselves in situations that either intersect with or impact Booz Allen business or our ability to perform our job, we properly disclose this conflict to our job or career managers and cease our activities where required or appropriate, or institute mitigation measures.</p> <p>We comply with all laws, regulations, and U.S. Government contracting rules regarding conflicts of interest.</p> <p>Each of us monitors our business activities on behalf of the firm for situations where the firm's objectivity may be questioned or our work grants us access to sensitive U.S. Government or third-party information.</p> <p>Certain client contracts require us to disclose financial or other personal interests. When required, we make these disclosures fully and accurately, and update them as required.</p> <p>Personal financial holdings or holdings of immediate family members, secondary employment, outside speaking engagements, or authoring works are examples of activities that can create a personal conflict of interest, and must be disclosed to be reviewed by the firm. We may never use corporate property, information, or position for personal opportunity, personal gain, or to compete with the firm.</p>

[p.33] Our policies explain how to identify any conflicts of interest, including those that may arise as part of participating in the political process, and when and how to disclose the conflict.

[20] Corporate Governance Guidelines (Document)

Accessed 23/04/2020

<https://investors.boozallen.com/static-files/f908c0ad-6518-4e38-81d6-836b603e5aa5>

[p.3] Conflicts of Interest

Each director will avoid taking actions or having interests that might result in a conflict of interest, that is, a situation where a director's private interest interferes in any way—or even appears to interfere—with the interests of the Company as a whole.

[p.4] Each director will ethically handle all actual or apparent conflicts of interest between personal and professional relationships, promptly informing the General Counsel, the Secretary or the Audit Committee if such a conflict arises and including recusing himself/herself from any discussion or decision affecting his/her personal interests. The Board will resolve any conflict of interest question involving a non-management director or the Chief Executive Officer and the Chief Executive Officer shall resolve any conflict of interest involving any other officer of the Company.

[17] Code of Ethics for Senior Financial Officers (Document)

Accessed 23/04/2020

<https://investors.boozallen.com/static-files/cd226a59-a136-496e-a80c-de218ef5590b>

[p.1] CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

Booz Allen Hamilton Holding Corporation (together with its subsidiaries, the "Company") has adopted this Code of Ethics for Senior Financial Officers (the "Code"). The Code supplements the Booz Allen Hamilton Code of Business Ethics and Conduct (the "Green Book"), 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 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 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 relationship (including those of your family members) affects, may affect, or appears 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 Green Book and the 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.

Question
4.2. Are there procedures in place to identify, declare and manage conflicts of interest, which are overseen by a body or individual ultimately accountable for the appropriate management and handling of conflict of interest cases?
Score
1
Comments
<p>There is some evidence that the company has procedures to identify, declare and manage conflicts of interest. The company indicates that employees must disclose any actual, potential or perceived conflicts to managers and to withdraw from activities where possible. The company's policy also mentions examples of criteria for recusals.</p> <p>However, the company receives a score of '1' because there is no publicly available evidence that disciplinary actions will apply if this policy is breached, nor is there evidence that all employee and board member declarations are held in a dedicated central register that is accessible to those responsible for oversight of the process.</p>
Evidence
<p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.15] We have zero tolerance for bribery and corruption, and avoid or mitigate actual and perceived conflicts of interest or the appearance of impropriety. We require all organizations acting on our behalf to do the same.</p> <p>HOW</p> <p>Our policies expressly forbid bribery and include specific procedures for how and when our people may give or receive a gift or business courtesy. We also rigorously vet our business partners to ensure they share our high ethical standards and we require prompt disclosure of any potential conflict of interest.</p> <p>[p.16] We compete through actions conducted at arm's length to avoid any actual or apparent conflict of interest.</p> <p>[p.23] WHAT</p> <p>We prohibit actual or perceived conflicts of interest that interfere with the interests of the firm, or that make it difficult for our people to perform their work objectively and effectively.</p> <p>WHY</p> <p>Booz Allen is committed to delivering objective, independent, and unbiased advice and assistance to clients.</p> <p>HOW</p> <p>When we find ourselves in situations that either intersect with or impact Booz Allen business or our ability to perform our job, we properly disclose this conflict to our job or career managers and cease our activities where required or appropriate, or institute mitigation measures.</p> <p>[20] Corporate Governance Guidelines (Document) Accessed 23/04/2020 https://investors.boozallen.com/static-files/f908c0ad-6518-4e38-81d6-836b603e5aa5 [p.3] Conflicts of Interest</p> <p>Each director will avoid taking actions or having interests that might result in a conflict of interest, that is, a situation where a director's private interest interferes in any way—or even appears to interfere—with the interests of the Company as a whole. Each</p> <p>[p.4] director will ethically handle all actual or apparent conflicts of interest between personal and professional relationships, promptly informing the General Counsel, the Secretary or the Audit Committee if such a conflict arises and including recusing himself/herself from any discussion or decision affecting his/her personal interests. The</p>

Board will resolve any conflict of interest question involving a non-management director or the Chief Executive Officer and the Chief Executive Officer shall resolve any conflict of interest involving any other officer of the Company.

Question
4.3. Does the company have a policy and procedure regulating the appointment of directors, employees or consultants from the public sector?
Score
1
Comments
<p>Based on publicly available information, there is evidence that the company has a policy that addresses the risks associated with the employment of public officials. There is evidence that the company has a system to implement additional approval and screening requirements when hiring former public officials. The company also states that it complies with all applicable laws and restrictions on post-U.S. government employment restrictions.</p> <p>However, there is no publicly available evidence that the company's policy includes further measures to reduce possible corruption or conflict of interest risks, such as a requirement for senior compliance officer (or equivalent) approval before the initiation of employment discussions, clear cooling off periods or restrictions on certain activities post-employment. It is noted that the company references a separate policy document that may contain further details on this subject, but it does not appear to be publicly available.</p>
Evidence
<p>[5] Recruiting, Hiring and Employee Referral Policy Summary (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/Recruiting-and-Hiring.pdf [p.1] Booz Allen makes every effort to hire individuals for positions that will best use their abilities and integrate the individuals' goals with those of the firm. The firm's hiring process is designed to provide fair and equitable treatment to all applicants and supports our commitment to select the best qualified candidate. As ambassadors of Booz Allen, employees are well positioned to recommend qualified candidates who embody our high ethical standards and will strengthen our values-based culture. The Employee Referral Program (ERP) provides an avenue to submit potential candidates to open positions and provides incentive bonuses for eligible hires.</p> <p>The purpose of this policy is to set forth the requirements for recruiting and hiring someone to work at the firm, including employee referrals and the referral bonus incentive.</p> <p>SUMMARY OF POLICY</p> <p>Booz Allen's Recruiting, Hiring and Employee Referral policy covers all of the following content in detail:</p> <p>[...]</p> <ul style="list-style-type: none"> • Outlines required documentation and approvals for all hires, including background screens and additional requirements for special consideration hires such as former U.S. government employees <p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.19] We Respect Post-Government Employment Restrictions</p> <p>WHAT We follow all applicable laws and restrictions when hiring current U.S. Government employees and staffing Booz Allen employees who were previously employed by the U.S. Government, regardless of where they would work within the firm.</p> <p>WHY As a U.S. Government contractor, we are required to comply with these laws and restrictions. In addition, doing so promotes transparency and avoids creating a conflict of interest for the firm and our people who were former U.S. Government employees.</p> <p>HOW</p>

We follow specific steps set forth in the firm's policy on hiring current U.S. Government employees and staffing employees with post-U.S. Government employment restrictions, including working closely with the firm's recruiters and resource managers who have a thorough understanding of these requirements and restrictions and who are responsible for ensuring the firm's compliance with these requirements.

ADDITIONAL RESOURCES

Post-Government Employment Policy

Question
4.4. Does the company report details of the contracted services of serving politicians to the company?
Score
0
Comments
There is no evidence that the company publishes details of the contracted services of serving politicians.
Evidence
No evidence found.

5. Customer Engagement

5.1 Contributions, Donations and Sponsorships

Question
5.1.1. Does the company have a clearly defined policy and/or procedure covering political contributions?
Score
0
Comments
<p>There is evidence that the company does not make corporate contributions to support political organisations, and this policy applies company-wide to all employees. There is evidence that the company is associated with a Political Action Committee (PAC) in the United States, which is managed and overseen by a board of directors.</p> <p>Since the company is associated with a PAC in the United States, it receives a score of '0' in line with the scoring criteria.</p>
Evidence
<p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.33] WHAT</p> <p>We respect the political process and our employees' rights to participate in it, and we may engage in lobbying on behalf of the firm when appropriate.</p> <p>WHY</p> <p>We support an active and fair political process that provides an opportunity for everyone to have a voice.</p> <p>HOW</p> <p>We comply with campaign finance and election laws. Our policies explain how to identify any conflicts of interest, including those that may arise as part of participating in the political process, and when and how to disclose the conflict.</p> <p>We belong to various associations and groups that may engage in lobbying activities, but any direct engagement in their lobbying activities must be approved by the Legal Department. Employees may engage in political activities during their personal time using their own resources, but are not permitted to use the firm's name or resources for political purposes.</p> <p>[7] Political Activities Statement (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/slick_sheet/booz-allen-political-activities.pdf [p.1] Booz Allen is a responsible corporate citizen and, like many others in the industry, participates in the political, legislative and regulatory process to represent the company's interests as a large employer and diverse global business. The firm maintains a robust compliance program and system of internal controls designed to ensure that its political activities comply with applicable law and Booz Allen policy</p> <p>[...]</p> <p>CORPORATE POLITICAL ACTIVITIES AND EXPENDITURES</p> <p>The Booz Allen Hamilton Inc. PAC (Booz Allen PAC) is a separate segregated fund established in accordance with federal law in 2019. The Booz Allen PAC is solely funded by the voluntary contributions of eligible Booz Allen employees. The Booz Allen PAC makes contributions on a bipartisan basis to U.S. federal congressional</p>

candidates based solely on their consistent record of support for firmwide business issues and interests. It does not make contributions for presidential elections or to candidates at the state or local level. The Booz Allen PAC is managed by its Board of Directors in compliance with all applicable campaign finance laws and its bylaws and policies. All contributions are reported to the FEC and may be viewed here: <http://www.fec.gov>.

Booz Allen respects the rights of its employees to participate personally in the political process. Individual employees may make contributions to candidates, parties or other political organizations pursuant to applicable federal, state and local laws or otherwise engage in political activities, but those contributions and activities are private in nature and do not necessarily reflect the perspective of Booz Allen.

[9] Booz Allen Cares (Webpage)




Accessed 04/09/2019

<https://www.boozallen.com/e/insight/thought-leadership/booz-allen-cares.html>

We Do Not Support

[...]

- Political or lobbying organizations

Question												
5.1.2. Does the company publish details of all political contributions made by the company and its subsidiaries, or a statement that it has made no such contribution?												
Score												
2												
Comments												
There is evidence that the company publishes information on the donations made through its Political Action Committee (PAC) in the United States, by providing a direct link to the Federal Election Commission website where full details of such expenditure can be found. There is evidence that the company does not make corporate political contributions through other channels.												
Evidence												
<p>[7] Political Activities Statement (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/slick_sheet/booz-allen-political-activities.pdf [p.1] CORPORATE POLITICAL ACTIVITIES AND EXPENDITURES</p> <p>The Booz Allen Hamilton Inc. PAC (Booz Allen PAC) is a separate segregated fund established in accordance with federal law in 2019. The Booz Allen PAC is solely funded by the voluntary contributions of eligible Booz Allen employees. The Booz Allen PAC makes contributions on a bipartisan basis to U.S. federal congressional candidates based solely on their consistent record of support for firmwide business issues and interests. It does not make contributions for presidential elections or to candidates at the state or local level. The Booz Allen PAC is managed by its Board of Directors in compliance with all applicable campaign finance laws and its bylaws and policies. All contributions are reported to the FEC and may be viewed here: http://www.fec.gov.</p> <p>[9] Booz Allen Cares (Webpage) Accessed 04/09/2019 https://www.boozallen.com/e/insight/thought-leadership/booz-allen-cares.html We Do Not Support</p> <p>[...]</p> <ul style="list-style-type: none">Political or lobbying organizations <p>[8] United States FEC – Booz Allen Hamilton Inc. PAC Accessed 06/01/2021 https://www.fec.gov/data/committee/C00709816/?tab=about-committee</p> <p>Committee information</p> <hr/> <table><tr><td>Committee name:</td><td>BOOZ ALLEN HAMILTON INC. PAC (BOOZ ALLEN PAC)</td></tr><tr><td>Mailing address:</td><td>901 15TH STREET, N.W. SUITE 400 WASHINGTON, DC 20005</td></tr><tr><td>Treasurer:</td><td>MCFARREN, TAMARA E.</td></tr><tr><td>Committee type:</td><td>Corporation PAC - Qualified</td></tr><tr><td>Connected organization:</td><td>BOOZ ALLEN HAMILTON INC.</td></tr><tr><td>Statement of organization:</td><td> Current version (PDF) FEC-1335537 Filed 06/21/2019</td></tr></table>	Committee name:	BOOZ ALLEN HAMILTON INC. PAC (BOOZ ALLEN PAC)	Mailing address:	901 15TH STREET, N.W. SUITE 400 WASHINGTON, DC 20005	Treasurer:	MCFARREN, TAMARA E.	Committee type:	Corporation PAC - Qualified	Connected organization:	BOOZ ALLEN HAMILTON INC.	Statement of organization:	 Current version (PDF) FEC-1335537 Filed 06/21/2019
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Committee type:	Corporation PAC - Qualified											
Connected organization:	BOOZ ALLEN HAMILTON INC.											
Statement of organization:	 Current version (PDF) FEC-1335537 Filed 06/21/2019											

Total spent

[Browse disbursements](#)

Coverage dates: 06/16/2019 to 12/31/2020

TOTAL DISBURSEMENTS	\$73,024.49
OPERATING EXPENDITURES	\$5,024.49
Allocated operating expenditures - federal	\$0.00
Allocated operating expenditures - non-federal	\$0.00
Other federal operating expenditures	\$5,024.49
TRANSFERS TO AFFILIATED COMMITTEES	\$0.00
CONTRIBUTIONS TO OTHER COMMITTEES	\$68,000.00
INDEPENDENT EXPENDITURES	\$0.00
PARTY COORDINATED EXPENDITURES	\$0.00
LOANS MADE	\$0.00
LOAN REPAYMENTS MADE	\$0.00
TOTAL CONTRIBUTION REFUNDS	\$0.00
Individual refunds	\$0.00
Political party refunds	\$0.00
Other committee refunds	\$0.00
OTHER DISBURSEMENTS	\$0.00
TOTAL FEDERAL ELECTION ACTIVITY	\$0.00
Allocated federal election activity - federal share	\$0.00
Allocated federal election activity - Levin share	\$0.00
Federal election activity - federal only	\$0.00
TOTAL FEDERAL DISBURSEMENTS	\$73,024.49

Newly filed summary data may not appear for up to 48 hours.

Question
5.1.3. Does the company have a clearly defined policy and/or procedure covering charitable donations and sponsorships, whether made directly or indirectly, and does it publish details of all such donations made by the company and its subsidiaries?
Score
1
Comments
<p>There is some evidence that the company has policies covering charitable donations and sponsorships, which specifies criteria for donations. There is also evidence that the company discloses some summary information on its total charitable contributions, specifically those made through a related foundation.</p> <p>However, the company receives a score of '1' because there is no publicly available evidence that its policy has specific controls in place to reduce the risk of bribery and corruption in its charitable activities, such as procedures for senior sign-off or due diligence on recipients. There is also no publicly available evidence that the company publishes full details of its charitable contributions and sponsorships, such as details of the recipient, amount, country of recipient and which corporate entity made the payment.</p>
Evidence
<p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.34] We Engage in Our Communities for Social Good</p> <p>WHAT We contribute to the communities where we live and work and empower ourselves to change the world.</p> <p>WHY Booz Allen cares about our people and the people of our communities. Helping communities through the generosity of our business and employees demonstrates this commitment.</p> <p>HOW We encourage all employees to be actively involved in the community through volunteerism. We do so by working through established groups within our firm, participating in sponsored activities, and encouraging contributions to charitable, educational, and civic organizations.</p> <p>[16] 10K Annual Report 2019 (Document) Accessed 10/09/2019 https://investors.boozallen.com/static-files/30f6e790-55d5-4ef5-868d-3602c3f66eed [p.F-39] 21. RELATED-PARTY TRANSACTIONS</p> <p>In March 2018, the Company supported the formation of the Booz Allen Foundation, a nonprofit corporation organized and operated exclusively for charitable, scientific and educational purposes within the meaning of Section 501(c)(3) of the Code. The Company is the sole member of the foundation, which gives it the authority to appoint two out of five of the Booz Allen Foundation's directors and consent rights regarding certain extraordinary corporate actions approved by the Company's Board of Directors. The Company has made a binding and irrevocable pledge of \$5.0 million to the Booz Allen Foundation, payable in installments, and recorded the pledge obligation in other current liabilities on the consolidated balance sheet of the Company in March 2017.</p> <p>As of March 31, 2019, the Company has satisfied the pledge obligation in full. The final two installment payments made to the Booz Allen Foundation in the third quarter of fiscal 2019 totaling \$3.3 million are classified as operating activities in the consolidated statement of cash flows. Two of our directors currently serve on the board of directors of a subcontractor to which the Company subcontracted \$55.3 million of services for the year ended March 31, 2019.</p>

[9] Booz Allen Cares (Webpage)

Accessed 04/09/2019

<https://www.boozallen.com/e/insight/thought-leadership/booz-allen-cares.html>

We Support

- Secular public charities (recognized by the US Internal Revenue Service as such) that affirm they have nondiscriminatory policies and/or practices
- Secular programs led by religious organizations that maintain public charity status (recognized by the US Internal Revenue Service as such) and affirm they have nondiscriminatory policies and/or practices
- Accredited schools included in the National Center for Education Statistics database
- Charitable activities occurring outside the US affiliated with public charities (recognized by the US Internal Revenue Service as such) or US accredited schools that affirm they have nondiscriminatory policies and/or practices
- Organizations that can affirm they do not discriminate, via policy or in practice, on the basis of race, color, ethnicity, religion, sex, national origin, age, marital status, sexual orientation, gender identity and expression, disability, veteran status, pregnancy, genetic information, or any other status protected by applicable federal, state, local, or international law

We Do Not Support

- Individuals
- Organizations that are not recognized by the US Internal Revenue Service as public charities under Internal Revenue Code section 501(c)(3), including private foundations
- Organizations awaiting an IRS determination of public charity status
- Unaccredited schools not listed in the National Center for Education Statistics database
- Religious activities
- Organizations listed on the U.S. Department of Homeland Security Watch List
- For-profit organizations
- Political or lobbying organizations

The decision to provide funding for a particular activity or to a particular organization is at the sole and exclusive discretion of Booz Allen, and may be provided or denied for any reason whatsoever. In no event will Booz Allen be responsible to any applicant for the cost of preparing or submitting a request for support.

Request Support

Apply for a Grant

By invitation only: Eligible nonprofits are invited to submit a grant request

5.2 Lobbying

Question
5.2.1 Does the company have a policy and/or procedure covering responsible lobbying?
Score
1
Comments
<p>There is evidence that the company has a policy and procedure on lobbying, which applies company-wide to all employees, board members and third parties engaged as lobbyists on the company's behalf. The company's policy includes procedures to identify any conflicts of interest associated with engagements in the political process and this approach is outlined in the company's Code of Business Ethics and Conduct which describes certain standards of conduct for all employees and third parties.</p> <p>However, it is not clear from publicly available information that the company's approach to lobbying includes further details such as specific guidelines or standards of conduct that apply to all types of lobbyists (internal, external and association) or clear oversight mechanisms to monitor activities. It is noted that the company references a separate policy document which may contain more information on its lobbying practices, but this does not appear to be publicly available.</p>
Evidence
<p>[7] Political Activities Statement (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/slick_sheet/booz-allen-political-activities.pdf [p.1] Booz Allen is a responsible corporate citizen and, like many others in the industry, participates in the political, legislative and regulatory process to represent the company's interests as a large employer and diverse global business. The firm maintains a robust compliance program and system of internal controls designed to ensure that its political activities comply with applicable law and Booz Allen policy.</p> <p>LOBBYING ACTIVITIES</p> <p>Booz Allen Hamilton engages in discussions with industry associations and interacts directly with various stakeholders throughout the U.S. Federal Government to provide meaningful input on policy issues, regulations and legislation that affect the best interests of the firm, its employees and shareholders. Engagements that are considered 'lobbying activities' under applicable law are reported to Congress on a quarterly basis. Federal reports disclosing lobbying activity and expenses are available via the Office of the Clerk of the U.S. House of Representatives and may be found at http://lobbyingdisclosure.house.gov. Booz Allen does not lobby on behalf of its clients.</p> <p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.6] Our Code represents these values in action and applies to all employees, officers, directors, contractors, consultants, and others working on our behalf.</p> <p>[p.33] We Respect the Political Process</p> <p>WHAT We respect the political process and our employees' rights to participate in it, and we may engage in lobbying on behalf of the firm when appropriate.</p> <p>WHY We support an active and fair political process that provides an opportunity for everyone to have a voice.</p> <p>HOW</p>

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

We belong to various associations and groups that may engage in lobbying activities, but any direct engagement in their lobbying activities must be approved by the Legal Department. Employees may engage in political activities during their personal time using their own resources, but are not permitted to use the firm's name or resources for political purposes. We do not lobby on behalf of clients because the law prohibits U.S. Government agencies from contracting for lobbying services. This ban includes testifying on behalf of a U.S. Government agency, drafting testimony for its officials to deliver, responding to questions or correspondence from U.S. Congress, or drafting agency responses to U.S. Government audits.

ADDITIONAL RESOURCES

Political Activities and Lobbying Policy
Secondary Employment Policy

Question																				
5.2.2 Does the company publish details of the aims and topics of its public policy development and lobbying activities it carries out?																				
Score																				
1																				
Comments																				
<p>There is evidence that the company publishes some information on its lobbying topics and activities in the United States, by making its quarterly federal lobbying reports publicly available via a direct link on its website.</p> <p>However, there is no evidence that the company provides further publicly available details about its broader public policy aims or positions. There is also no evidence that the company publishes any information on the activities that it has conducted in other jurisdictions nor does it clearly state that it has not engaged in lobbying elsewhere in the most recently reported financial period.</p>																				
Evidence																				
<p>[7] Political Activities Statement (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/slick_sheet/booz-allen-political-activities.pdf [p.1] Booz Allen is a responsible corporate citizen and, like many others in the industry, participates in the political, legislative and regulatory process to represent the company's interests as a large employer and diverse global business. The firm maintains a robust compliance program and system of internal controls designed to ensure that its political activities comply with applicable law and Booz Allen policy.</p> <p>LOBBYING ACTIVITIES</p> <p>Booz Allen Hamilton engages in discussions with industry associations and interacts directly with various stakeholders throughout the U.S. Federal Government to provide meaningful input on policy issues, regulations and legislation that affect the best interests of the firm, its employees and shareholders. Engagements that are considered 'lobbying activities' under applicable law are reported to Congress on a quarterly basis. Federal reports disclosing lobbying activity and expenses are available via the Office of the Clerk of the U.S. House of Representatives and may be found at http://lobbyingdisclosure.house.gov. Booz Allen does not lobby on behalf of its clients.</p> <p>[26] United States Lobbying Disclosures Q4 2020 – Registrant: "Booz Allen Hamilton Inc" (Webpage) Accessed 01/02/2021 https://disclosurespreview.house.gov/ld/ldxmlrelease/2020/Q4/301245050.xml LOBBYING ACTIVITY. Select as many codes as necessary to reflect the general issue areas in which the registrant engaged in lobbying on behalf of the client during the reporting period. Using a separate page for each code, provide information as requested. Add additional page(s) as needed.</p> <p>15. General issue area code DEF</p> <p>16. Specific lobbying issues</p> <div style="border: 1px solid black; padding: 5px;"> <p>CARES Act (P.L. 116-636) Section 3610 - issues related to federal government contractors; FY21 DoD appropriations - H.R. 133, Consolidated Appropriations Act, 2021; H.R. 6395, National Defense Authorization Act for Fiscal Year 2021; S. 4049, National Defense Authorization Act for Fiscal Year 2021; Issues related to Army R&D funding</p> </div> <p>17. House(s) of Congress and Federal agencies <input type="checkbox"/> Check if None</p> <div style="border: 1px solid black; padding: 2px;"> <p>U.S. SENATE, U.S. HOUSE OF REPRESENTATIVES</p> </div> <p>18. Name of each individual who acted as a lobbyist in this issue area</p> <table border="1"> <thead> <tr> <th>First Name</th> <th>Last Name</th> <th>Suffix</th> <th>Covered Official Position (if applicable)</th> <th>New</th> </tr> </thead> <tbody> <tr> <td>Sharon</td> <td>Hardie</td> <td></td> <td></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Chelsey</td> <td>Thomas</td> <td></td> <td></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Mara</td> <td>Motherway</td> <td></td> <td></td> <td><input type="checkbox"/></td> </tr> </tbody> </table> <p>19. Interest of each foreign entity in the specific issues listed on line 16 above <input checked="" type="checkbox"/> Check if None</p> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <p>[Webpage shows disclosures for other general issues areas]</p>	First Name	Last Name	Suffix	Covered Official Position (if applicable)	New	Sharon	Hardie			<input type="checkbox"/>	Chelsey	Thomas			<input type="checkbox"/>	Mara	Motherway			<input type="checkbox"/>
First Name	Last Name	Suffix	Covered Official Position (if applicable)	New																
Sharon	Hardie			<input type="checkbox"/>																
Chelsey	Thomas			<input type="checkbox"/>																
Mara	Motherway			<input type="checkbox"/>																

Question				
5.2.3 Does the company publish full details of its global lobbying expenditure?				
Score				
1				
Comments				
<p>There is evidence that the company publishes summary information of its lobbying expenditure in the United States, by making its quarterly federal lobbying reports publicly available via a direct link on its website.</p> <p>However, the company receives a score of '1' because there is no evidence that it provides a breakdown of its expenditure data to show costs relating to internal, external or association lobbyists. There is also no evidence that the company publishes information on its lobbying expenditure in other jurisdictions nor does it clearly state that it has not engaged in lobbying elsewhere in the most recently reported financial period.</p>				
Evidence				
<p>[7] Political Activities Statement (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/slick_sheet/booz-allen-political-activities.pdf [p.1] LOBBYING ACTIVITIES</p> <p>Booz Allen Hamilton engages in discussions with industry associations and interacts directly with various stakeholders throughout the U.S. Federal Government to provide meaningful input on policy issues, regulations and legislation that affect the best interests of the firm, its employees and shareholders. Engagements that are considered 'lobbying activities' under applicable law are reported to Congress on a quarterly basis. Federal reports disclosing lobbying activity and expenses are available via the Office of the Clerk of the U.S. House of Representatives and may be found at http://lobbyingdisclosure.house.gov. Booz Allen does not lobby on behalf of its clients.</p> <p>[26] United States Lobbying Disclosures Q4 2020 – Registrant: “Booz Allen Hamilton Inc” (Webpage) Accessed 01/02/2021 https://disclosurespreview.house.gov/ld/ldxmlrelease/2020/Q4/301245050.xml</p> <p>TYPE OF REPORT 8. Year <u>2020</u> Q1 (1/1 - 3/31) Q2 (4/1 - 6/30) Q3 (7/1 - 9/30) Q4 (10/1 - 12/31)</p> <p>9. Check if this filing amends a previously filed version of this report <input type="checkbox"/></p> <p>10. Check if this is a Termination Report <input type="checkbox"/> Termination Date _____ 11. No Lobbying Issue Activity <input type="checkbox"/></p> <table border="1"> <tr> <th colspan="2">INCOME OR EXPENSES - YOU MUST complete either Line 12 or Line 13</th> </tr> <tr> <td> <p>12. Lobbying</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$5,000 <input type="checkbox"/></p> <p>\$5,000 or more <input type="checkbox"/> \$ _____</p> <p>Provide a good faith estimate, rounded to the nearest \$10,000, of all lobbying related income for the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p> </td> <td> <p>13. Organizations</p> <p>EXPENSE relating to lobbying activities for this reporting period were:</p> <p>Less than \$5,000 <input type="checkbox"/></p> <p>\$5,000 or more <input checked="" type="checkbox"/> \$ <u>190,000.00</u></p> <p>14. REPORTING Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input checked="" type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code</p> </td> </tr> </table> <p>Signature <u>Digitally Signed By: Mara Motherway</u> Date <u>1/21/2021 4:19:35 PM</u></p>	INCOME OR EXPENSES - YOU MUST complete either Line 12 or Line 13		<p>12. Lobbying</p> <p>INCOME relating to lobbying activities for this reporting period was:</p> <p>Less than \$5,000 <input type="checkbox"/></p> <p>\$5,000 or more <input type="checkbox"/> \$ _____</p> <p>Provide a good faith estimate, rounded to the nearest \$10,000, of all lobbying related income for the client (including all payments to the registrant by any other entity for lobbying activities on behalf of the client).</p>	<p>13. Organizations</p> <p>EXPENSE relating to lobbying activities for this reporting period were:</p> <p>Less than \$5,000 <input type="checkbox"/></p> <p>\$5,000 or more <input checked="" type="checkbox"/> \$ <u>190,000.00</u></p> <p>14. REPORTING Check box to indicate expense accounting method. See instructions for description of options.</p> <p><input type="checkbox"/> Method A. Reporting amounts using LDA definitions only</p> <p><input type="checkbox"/> Method B. Reporting amounts under section 6033(b)(8) of the Internal Revenue Code</p> <p><input checked="" type="checkbox"/> Method C. Reporting amounts under section 162(e) of the Internal Revenue Code</p>
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5.3 Gifts and Hospitality

Question
5.3.1 Does the company have a policy and/or procedure on gifts and hospitality to ensure they are bona fide to prevent undue influence or other corruption?
Score
1
Comments
<p>There is evidence that the company has a policy and/or procedure on the giving and receipt of gifts and hospitality with clear procedures designed to ensure that such promotional expenses are bona fide and not used for bribery. There is evidence that this policy has financial limits, along with an approval procedure, for the different types of promotional expense that employees may encounter. The policy also addresses the risks associated with gifts and hospitality given to and/or received from domestic and foreign public officials.</p> <p>However, there is no evidence indicating that all gifts and hospitality above a certain threshold are recorded in a dedicated register or central depository that is accessible to those responsible for oversight of the process.</p>
Evidence
<p>[25] Gifts & Business Courtesies Policy (Document) Accessed 11/06/2020 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/Gifts-and-Business-Courtesies.pdf [p.1] Under proper circumstances, giving or receiving a gift or business courtesy can help build or maintain a strong business relationship. However, giving or receiving such gifts and business courtesies may be restricted or prohibited by law, contract terms or internal policies of the recipient's employer. Also, giving or receiving gifts or business courtesies may create the appearance of impropriety.</p> <p>The purpose of this policy is to ensure that whenever Booz Allen people are offering, giving, or receiving a gift or business courtesy in connection with the firm's business, that they do so in accordance with applicable law and contract requirements, and avoid actual or perceived conflicts of interest, or the appearance of impropriety.</p> <p>SUMMARY OF POLICY Booz Allen's Gifts and Business Courtesies policy covers all of the following content in detail:</p> <ul style="list-style-type: none"> • Related policies at the firm that employees should read in connection with this policy • Scope of who the policy applies to • Defines and gives examples of gifts and business courtesies, including certain items that are prohibited from being given or received • Defines government officials • Establishes criteria that all gifts and business courtesies must satisfy • Prohibits political contributions, either directly or indirectly, unless coordinated solely by Government Relations • Sets forth the rules and approvals required for offering, giving, or receiving gifts and business courtesies in connection with U.S. government officials, non-U.S. government officials, employees of commercial companies or not for profit organizations, employees of current or potential business partners, and between Booz Allen Employees • 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 • Points of contact and additional resources <p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.15] WHAT We have zero tolerance for corruption. We follow all applicable laws, Booz Allen policy, and the recipient's policies when giving or receiving gifts. We never give gifts to win work or to gain an improper advantage and never accept gifts that are meant to improperly influence us.</p>

[...]

HOW

Our policies expressly forbid bribery and include specific procedures for how and when our people may give or receive a gift or business courtesy. We also rigorously vet our business partners to ensure they share our high ethical standards and we require prompt disclosure of any potential conflict of interest.

6. Supply Chain Management

Question
6.1. Does the company require the involvement of its procurement department in the establishment of new supplier relationships and in the oversight of its supplier base?
Score
1
Comments
<p>There is evidence that the company's procurement department is involved, in some capacity, in the establishment and oversight of supplier relationships and there is evidence indicating that this department is the main body responsible for oversight of the company's supplier base;</p> <p>However, there is no evidence that the company assures itself that proper procedures regarding the onboarding of suppliers are followed through clearly stated means, such as an audit, at least every three years.</p>
Evidence
<p>[10] Procurement of Products and Services Policy Summary (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/Procurement.pdf [p.1] INTRODUCTION</p> <p>At Booz Allen, we have established a limited number of appropriate procurement channels for Booz Allen people to initiate, approve, and pay for purchases of products and services. Using only these specific procurement channels allows Booz Allen to maintain appropriate working relationships with suppliers, drive usage of preferred suppliers, protect the firm's reputation for integrity and comply with any applicable laws and contractual terms. The purpose of this policy is to set forth the firm's rules on procuring products and services.</p> <p>SUMMARY OF POLICY</p> <p>Booz Allen's Procurement of Products and Services policy covers all of the following content in detail:</p> <ul style="list-style-type: none"> • Related policies at the firm that employees should read in connection with this policy • Scope of who the policy applies to • Defines different types of procurements and suppliers • Sets forth clear guidance on how employees must initiate and engage in procurements through specific firm systems with the involvement of procurement and other functions • Outlines Booz Allen's Preferred Supplier Program for engaging and leveraging specific suppliers • Sets forth key rules for how procurements are approved and paid for • Outlines procedures on how to identify and escalate questions and red flags about invoices • 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 • Points of contact and additional resources <p>[24] Vendor Service Centre Website (Webpage) Accessed 23/04/2020 https://vendors.bah.com/ Welcome to the Vendor Service Center Thank you for visiting the Booz Allen Hamilton Vendor Service Center. This site will provide you with the latest information on best practices for invoicing and remittance options and services available to you.</p> <p>We value your business and are happy to be able to provide information at your fingertips, which will enhance your vendor payment experience. At this site, you will find resources on how to obtain payment information, e-invoicing options, how to register for electronic payments and review Booz Allen's standard invoicing requirements for both domestic and non-US vendors. Please visit this site from time to time for updates and helpful information. Our goal is to provide accurate and on-time payments while being diligent and responsive to your inquiries.</p>

For free access to the Ariba eInvoicing Portal or for invoice inquiries, please contact the Booz Allen Hamilton Help Desk at help_desk@bah.com or call 877-927-8278.

Booz Allen International: 866 552 3869

Germany: 00 800 182 2555

Singapore: 800 130 2221

Japan: 0066 33 821780

Indonesia: 001 803 015 205 4618

Question
6.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging with its suppliers?
Score
1
Comments
<p>There is evidence that the company has formal procedures to conduct due diligence on its suppliers, which includes checks on ultimate beneficial ownership. There is also evidence suggesting that the company is willing to review and/or terminate supplier relationships in circumstances where a red flag highlighted in the due diligence process cannot be mitigated. The company indicates that due diligence will be undertaken at the outset and over the course of a business relationship.</p> <p>However, it is unclear how frequently due diligence is refreshed, and there is no evidence to suggest that highest risk suppliers are subject to enhanced due diligence..</p>
Evidence
<p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.18] HOW</p> <p>We conduct appropriate due diligence of potential business partners, and do not engage in business activities with business partners without the appropriate approvals. We screen third parties that will act on our behalf as a business intermediary to ensure they have the same high ethical standards.</p> <p>ADDITIONAL RESOURCES</p> <p>Working with Ethical Business Intermediaries Policy Procurement of Goods and Services Policy</p> <p>[12] Working with Ethical Business Intermediaries (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries.pdf [p.1] We conduct appropriate anticorruption due diligence of potential business intermediaries that engage in certain activities on our behalf, and we do not engage in business activities with these business intermediaries without the appropriate approvals.</p> <p>The purpose of this policy is to establish requirements for (i) reviewing business intermediaries prior to doing business with them to confirm that their ethical standards align with Booz Allen's, and (ii) reviewing billing statements from business intermediaries to ensure they are operating on our behalf in a manner consistent with our ethical standards.</p> <p>SUMMARY OF POLICY</p> <p>Booz Allen's Working with Ethical Business Intermediaries policy covers all of the following content in detail:</p> <ul style="list-style-type: none"> • Related policies at the firm that employees should read in connection with this policy • Scope of who the policy applies to • Defines business intermediaries, business development agents, and government officials • Explains aspects of business intermediary agreements with the firm • Establishes certain requirements for using business intermediaries including monitoring, approving payments and managing agreement changes • Defines process for initiating anticorruption due diligence reviews prior to firm issuing a verbal or written commitment to a prospective business intermediary, including our anticorruption due diligence questionnaire • Prescribes cadence for continuous due diligence reviews after an agreement with a business intermediary is reached • Addresses special requirements for review of business development agents and related agreements

- 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
- Points of contact and additional resources

[13] Business Intermediary Questionnaire (Document)

Accessed 04/09/2019

https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries-questionnaire.pdf

[p.1] Booz Allen is committed to leading in ethics and conducting business honestly, ethically and with integrity. Booz Allen reviews its relationships with Business Intermediaries to assess any risks posed by interactions between the Business Intermediary and other individuals on Booz Allen's behalf. Before Booz Allen will make any commitment (verbal or written) to a prospective Business Intermediary, and as a pre-condition to entering into any agreement, making any payment under any such agreement, or committing to or entering into final negotiations regarding any amendment to any agreement that materially increases Booz Allen's anti-corruption risks, Booz Allen will conduct a due diligence review in accordance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Action 2010, and other applicable anti-corruption laws, regulations and prohibitions against corruption (the "Anti-Corruption Laws") of the Business Intermediary designed to assess the prospective Business Intermediary's competence, expertise, and reputation, as well as any contacts it may have with Government officials.

[...]

C. Company Ownership and Management

1. Please identify the owner(s) of the Company, their nationality and percentage of ownership interest. If a business entity owns any portion of the Company, please trace ownership of all such entities back through as many layers as necessary to identify all ultimate individual owners of such entities. For any company in the chain of ownership that is traded on the NYSE, NASDAQ, or London Stock Exchange ("LSE"), this information is not required.

[p.2]

E. Government Relationships

1. Is any owner, officer, manager, agent, affiliate, or employee of the Company an employee or official of any government agency, department or instrumentality; political party; public international organization; a candidate for political office; or member of a royal family?

If yes, please provide details

2. Does any owner, officer, manager, agent, affiliate, or employee of the Company have a familial or other close personal relationship with any employee or official of any government agency, department or instrumentality; political party; public international organization; candidate for political office; or member of a royal family?

If yes, please provide details

3. Is the Company owned or controlled by any government or government-owned or controlled instrumentality; public international organization; political party; candidate for political office; or member of a royal family?

If yes, please describe the government or royal family ownership or controlling interest

4. Does or will any government official or government employee; employee of a public international organization; political party official; or member of a royal family have any financial interest in, or receive any financial or other benefits from, any contract or project involving the Company and Booz Allen Hamilton Inc.?

If Yes, please describe

5. With respect to officials or employees of a government agency, department or instrumentality; officials or employees a public international organization; political party officials; candidates for political office; or members of a royal family, do you provide (a) gifts, entertainment, hospitalities or investment opportunities provided to the individual(s) or their relatives; (b) reimbursed expenses or payments of per diems, commissions or retainers directly to foreign officials, political party officials or royal family members in connection with promotional or investment opportunities; (c) payments to charitable organizations or other third-party payments directed or headed by foreign officials and (d) business ventures entered directly by the Company or other business partners with government officials or their relatives?

If Yes, please describe

F. Compliance and Business Ethics

1. Does the Company have a written code, procedure or policy addressing business ethics, including but not limited to policies and procedures relating to Anti-Corruption Laws and related issues? For purposes of this document, the term "Anti-Corruption Laws" refers to relevant local anti-corruption or anti-bribery laws and the U.S. Foreign Corrupt Practices Act (the "FCPA").

[p.3]

E. Government Relationships

1. Is any owner, officer, manager, agent, affiliate, or employee of the Company an employee or official of any government agency, department or instrumentality; political party; public international organization; a candidate for political office; or member of a royal family?

If yes, please provide details

2. Does any owner, officer, manager, agent, affiliate, or employee of the Company have a familial or other close personal relationship with any employee or official of any government agency, department or instrumentality; political party; public international organization; candidate for political office; or member of a royal family?

If yes, please provide details

3. Is the Company owned or controlled by any government or government-owned or controlled instrumentality; public international organization; political party; candidate for political office; or member of a royal family?

If yes, please describe the government or royal family ownership or controlling interest

4. Does or will any government official or government employee; employee of a public international organization; political party official; or member of a royal family have any financial interest in, or receive any financial or other benefits from, any contract or project involving the Company and Booz Allen Hamilton Inc.?

If Yes, please describe

5. With respect to officials or employees of a government agency, department or instrumentality; officials or employees a public international organization; political party officials; candidates for political office; or members of a royal family, do you provide (a) gifts, entertainment, hospitalities or investment opportunities provided to the individual(s) or their relatives; (b) reimbursed expenses or payments of per diems, commissions or retainers directly to foreign officials, political party officials or royal family members in connection with promotional or investment opportunities; (c) payments to charitable organizations or other third-party payments directed or headed by foreign officials and (d) business ventures entered directly by the Company or other business partners with government officials or their relatives?

If Yes, please describe

Question
6.3 Does the company require all of its suppliers to have adequate standards of anti-bribery and corruption policies and procedures in place?
Score
1
Comments
<p>There is evidence that the company ensures that its suppliers have adequate anti-bribery and corruption policies and procedures in place, by requiring all suppliers to adhere to its Supplier Code of Conduct. This policy explicitly states that all suppliers must have policies that prohibit foreign and domestic bribery and facilitation payments, as well as policies that cover conflicts of interest, gifts and hospitality, and whistleblowing.</p> <p>However, it is not specified whether this assurance is conducted only when onboarding new suppliers or when there is a significant change in the business relationship.</p>
Evidence
<p>[1] Anti-Corruption and Anti-Bribery Compliance Programme Homepage (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics/anticorruption-and-anti-bribery-compliance-program.html Requiring certain suppliers and subcontractors to comply with anticorruption and anti-bribery laws, submit to audits, and allow Booz Allen to terminate agreements with third parties who we suspect may have violated anticorruption and anti-bribery laws or are not in compliance with contractual terms.</p> <p>[11] Supplier Code of Conduct (Webpage) Accessed 04/09/2019 https://www.boozallen.com/tools/utility-navigation-pages/government-contract-vehicles/supplier-code-of-conduct.html Standards of conduct for subcontractors and suppliers</p> <p>Preamble This Supplier Code of Conduct ("Code") reflects the standards of conduct required of subcontractors and suppliers (collectively "Suppliers") of Booz Allen Hamilton Inc. ("Booz Allen") in the delivery of services to Booz Allen and/or its ultimate customers, including the United States Government ("Government"). The terms and conditions herein are in addition to, and are not intended to conflict with or modify, the terms and conditions of any subcontract, purchase order or other applicable agreement ("Agreement"). In the event of any conflict, applicable law or regulation shall take precedence, followed by the terms and conditions of any applicable Agreement (including other attachments thereto), followed by the terms of this Code.</p> <p>1. Compliance with Law Supplier will fully comply with all applicable laws and regulations, including local laws and regulations outside the United States where the Supplier conducts business or maintains a place of business.</p> <p>[...]</p> <p>5. Anti-corruption Supplier shall comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business, including without limitation the US Foreign Corrupt Practices Act and the UK Bribery Act. Supplier is required to refrain from offering or making, or authorizing or enabling any third party to offer or make on Supplier's behalf, any improper payments of money or any other thing of value to government officials, political parties, or candidates for public office. Facilitating payments, intended to expedite or ensure performance of routine governmental actions, are also prohibited regardless of whether they are permitted under local law. We expect Supplier will conduct appropriate due diligence to prevent and detect corruption in its business arrangements and contracts.</p> <p>6. Business Courtesies The exchange of business courtesies may not be used to advance any improper purpose or obtain an unfair competitive advantage. Supplier must ensure that the offering or receipt of any gift or business courtesy is permitted</p>

by law and regulation, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable marketplace customs and practices.

[...]

10. Conflict of Interest

Supplier must avoid all actual or apparent conflicts of interest in its dealings with Booz Allen. We expect Supplier to notify Booz Allen in the event of any circumstances or interests that give rise to that any such conflict, whether organizational or personal (including interests of employees or their close relatives, friends or associates) in nature.

[...]

16. Ethics Program

We expect Supplier to comply with FAR 52.203-13 as applicable and, commensurate with the size and nature of its business, to have effective systems in place to comply with laws, regulations and the standards set forth in this Code. We encourage Supplier to implement its own written code of conduct and flow down the principles of that code to its suppliers and subcontractors. Additionally, we expect Supplier to provide employees reasonable avenues to raise legal or ethical concerns without fear of retaliation and take preventative or corrective action when warranted

17. Audit and Enforcement

We expect Supplier will implement and maintain measures to audit its compliance with these standards and to take appropriate corporate or personnel action to correct identified deficiencies.

18. Consequences for Violating Code

Booz Allen reserves the right to pursue corrective action to remedy any violation of any of these standards. In the case of a violation of law or regulation, Booz Allen may be required to report such violations to the proper authorities.

[2] Code of Business Ethics and Conduct (Document)

Accessed 03/09/2019

https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf

[p.15] We have zero tolerance for bribery and corruption, and avoid or mitigate actual and perceived conflicts of interest or the appearance of impropriety. We require all organizations acting on our behalf to do the same.

Question
6.4 Does the company ensure that its suppliers require all their sub-contractors to have anti-corruption programmes in place that at a minimum adhere to the standards established by the main contractor?
Score
2
Comments
<p>There is some evidence that the company takes steps to ensure that the substance of its anti-bribery and corruption programme and standards are required of sub-contractors throughout the supply chain. The company indicates that it expects suppliers to conduct appropriate due diligence on its subcontractors and flow down the principles of its anti-bribery and corruption policies throughout the supply chain.</p>
Evidence
<p>[11] Supplier Code of Conduct (Webpage) Accessed 04/09/2019 https://www.boozallen.com/tools/utility-navigation-pages/government-contract-vehicles/supplier-code-of-conduct.html</p> <p>This Supplier Code of Conduct ("Code") reflects the standards of conduct required of subcontractors and suppliers (collectively "Suppliers") of Booz Allen Hamilton Inc. ("Booz Allen") in the delivery of services to Booz Allen and/or its ultimate customers, including the United States Government ("Government"). The terms and conditions herein are in addition to, and are not intended to conflict with or modify, the terms and conditions of any subcontract, purchase order or other applicable agreement ("Agreement"). In the event of any conflict, applicable law or regulation shall take precedence, followed by the terms and conditions of any applicable Agreement (including other attachments thereto), followed by the terms of this Code.</p> <p>1. Compliance with Law Supplier will fully comply with all applicable laws and regulations, including local laws and regulations outside the United States where the Supplier conducts business or maintains a place of business.</p> <p>2. Records Booz Allen expects transparency from itself and all levels of its supply chain. Supplier will create and maintain complete and accurate records and not alter any records to conceal or misrepresent the underlying transaction to which the record pertains. Supplier should retain records based on its applicable retention requirements, provided that if Supplier is ultimately performing for Booz Allen under a US Government contract, Supplier shall comply with the requirements stated in FAR 4.703 as well as the applicable requirements of the customer agency and any relevant National Archives and Records Administration applicable to that agency.</p> <p>[...]</p> <p>5. Anti-corruption Supplier shall comply with the anti-corruption laws, directives and regulations that govern operations in the countries in which they do business, including without limitation the US Foreign Corrupt Practices Act and the UK Bribery Act. Supplier is required to refrain from offering or making, or authorizing or enabling any third party to offer or make on Supplier's behalf, any improper payments of money or any other thing of value to government officials, political parties, or candidates for public office. Facilitating payments, intended to expedite or ensure performance of routine governmental actions, are also prohibited regardless of whether they are permitted under local law. We expect Supplier will conduct appropriate due diligence to prevent and detect corruption in its business arrangements and contracts.</p> <p>[...]</p> <p>16. Ethics Program We expect Supplier to comply with FAR 52.203-13 as applicable and, commensurate with the size and nature of its business, to have effective systems in place to comply with laws, regulations and the standards set forth in this Code. We encourage Supplier to implement its own written code of conduct and flow down the principles of that code to its suppliers and subcontractors. Additionally, we expect Supplier to provide employees reasonable avenues to raise legal or ethical concerns without fear of retaliation and take preventative or corrective action when warranted</p>

17. Audit and Enforcement

We expect Supplier will implement and maintain measures to audit its compliance with these standards and to take appropriate corporate or personnel action to correct identified deficiencies.

Question
6.5 Does the company publish high-level results from ethical incident investigations and disciplinary actions against suppliers?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or anti-bribery and corruption reports, investigations or the associated disciplinary actions involving its suppliers.
Evidence
No evidence found.

7. Agents, Intermediaries and Joint Ventures

7.1 Agents and Intermediaries

Question
7.1.1 Does the company have a clear policy on the use of agents?
Score
1
Comments
<p>There is evidence that the company has a policy and procedures to control the use of agents which addresses the corruption risks associated with the use of agents and provides details of specific controls to mitigate these risks, including due diligence reviews, as well as reporting and invoicing requirements. This policy applies to all divisions within the organisation which might employ agents, including subsidiaries and joint ventures.</p> <p>However, there is no publicly available evidence that the company specifically commits to establishing and verifying that the use of an agent is, in each case, necessary to perform a legitimate business function.</p>
Evidence
<p>[13] Business Intermediary Questionnaire (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries-questionnaire.pdf [p.1] Booz Allen is committed to leading in ethics and conducting business honestly, ethically and with integrity. Booz Allen reviews its relationships with Business Intermediaries to assess any risks posed by interactions between the Business Intermediary and other individuals on Booz Allen's behalf. Before Booz Allen will make any commitment (verbal or written) to a prospective Business Intermediary, and as a pre-condition to entering into any agreement, making any payment under any such agreement, or committing to or entering into final negotiations regarding any amendment to any agreement that materially increases Booz Allen's anti-corruption risks, Booz Allen will conduct a due diligence review in accordance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Action 2010, and other applicable anti-corruption laws, regulations and prohibitions against corruption (the "Anti-Corruption Laws") of the Business Intermediary designed to assess the prospective Business Intermediary's competence, expertise, and reputation, as well as any contacts it may have with Government officials.</p> <p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.18] WHAT</p> <p>We expect all our clients and business partners, including subcontractors, suppliers, vendors, and business intermediaries, to operate in a manner that is consistent and compliant with our values and code.</p> <p>WHY</p> <p>We have zero tolerance for, and do not engage in, criminal activity of any kind. Knowing that our business partners are ethical organizations helps to ensure that Booz Allen does not associate with a disreputable organization or become unintentionally involved in any criminal activity.</p> <p>HOW</p> <p>We conduct appropriate due diligence of potential business partners, and do not engage in business activities with business partners without the appropriate approvals. We screen third parties that will act on our behalf as a business intermediary to ensure they have the same high ethical standards.</p>

[12] Working with Ethical Business Intermediaries (Document)

Accessed 04/09/2019

https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries.pdf

[p.1] Booz Allen has zero tolerance for, and does not engage in, bribery or corruption. We expect our business partners to operate in a manner that is consistent and compliant with the law, our values, and the Booz Allen Hamilton Code of Business Ethics and Conduct. We conduct appropriate anticorruption due diligence of potential business intermediaries that engage in certain activities on our behalf, and we do not engage in business activities with these business intermediaries without the appropriate approvals. The purpose of this policy is to establish requirements for (i) reviewing business intermediaries prior to doing business with them to confirm that their ethical standards align with Booz Allen's, and (ii) reviewing billing statements from business intermediaries to ensure they are operating on our behalf in a manner consistent with our ethical standards.

SUMMARY OF POLICY

Booz Allen's Working with Ethical Business Intermediaries policy covers all of the following content in detail:

- Scope of who the policy applies to
- Related policies at the firm that employees should read in connection with this policy
- Defines business intermediaries, business development agents, and government officials
- Explains aspects of business intermediary agreements with the firm
- Establishes certain requirements for using business intermediaries including monitoring, approving payments and managing agreement changes
- Defines process for initiating anticorruption due diligence reviews prior to firm issuing a verbal or written commitment to a prospective business intermediary, including our anticorruption due diligence questionnaire
- Prescribes cadence for continuous due diligence reviews after an agreement with a business intermediary is reached
- Addresses special requirements for review of business development agents and related agreements
- 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

Question
7.1.2 Does the company conduct risk-based anti-bribery and corruption due diligence when engaging or re-engaging its agents and intermediaries?
Score
2
Comments
<p>There is evidence that the company has formal procedures to conduct risk-based anti-bribery and corruption due diligence prior to engaging and/or re-engaging any agents and intermediaries. There is evidence that all agents and highest risk intermediaries are subject to enhanced due diligence. There is additional evidence that the company commits to not engaging or terminating its engagement with agents or intermediaries where the risks identified in the due diligence cannot be mitigated. In addition, the company indicates that it has procedures in place to conduct due diligence reviews on a continuous basis throughout the business relationship.</p>
Evidence
<p>[1] Anti-Corruption and Anti-Bribery Compliance Programme Homepage (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics/anticorruption-and-anti-bribery-compliance-program.html Key program focus areas include:</p> <ul style="list-style-type: none"> -Conducting robust due diligence of certain third parties with whom we do business, as outlined in our Working with Ethical Business Intermediaries policy. <p>[12] Working with Ethical Business Intermediaries (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries.pdf [p.1] Booz Allen has zero tolerance for, and does not engage in, bribery or corruption. We expect our business partners to operate in a manner that is consistent and compliant with the law, our values, and the Booz Allen Hamilton Code of Business Ethics and Conduct. We conduct appropriate anticorruption due diligence of potential business intermediaries that engage in certain activities on our behalf, and we do not engage in business activities with these business intermediaries without the appropriate approvals.</p> <p>The purpose of this policy is to establish requirements for (i) reviewing business intermediaries prior to doing business with them to confirm that their ethical standards align with Booz Allen's, and (ii) reviewing billing statements from business intermediaries to ensure they are operating on our behalf in a manner consistent with our ethical standards.</p> <p>SUMMARY OF POLICY</p> <p>Booz Allen's Working with Ethical Business Intermediaries policy covers all of the following content in detail:</p> <p>[...]</p> <ul style="list-style-type: none"> • Establishes certain requirements for using business intermediaries including monitoring, approving payments and managing agreement changes • Defines process for initiating anticorruption due diligence reviews prior to firm issuing a verbal or written commitment to a prospective business intermediary, including our anticorruption due diligence questionnaire • Prescribes cadence for continuous due diligence reviews after an agreement with a business intermediary is reached <p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.15] Our policies expressly forbid bribery and include specific procedures for how and when our people may give or receive a gift or business courtesy. We also rigorously vet our business partners to ensure they share our high ethical standards and we require prompt disclosure of any potential conflict of interest.</p>

[13] Business Intermediary Questionnaire (Document)

Accessed 04/09/2019

https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries-questionnaire.pdf

[p.1] Booz Allen is committed to leading in ethics and conducting business honestly, ethically and with integrity. Booz Allen reviews its relationships with Business Intermediaries to assess any risks posed by interactions between the Business Intermediary and other individuals on Booz Allen's behalf. Before Booz Allen will make any commitment (verbal or written) to a prospective Business Intermediary, and as a pre-condition to entering into any agreement, making any payment under any such agreement, or committing to or entering into final negotiations regarding any amendment to any agreement that materially increases Booz Allen's anti-corruption risks, Booz Allen will conduct a due diligence review in accordance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Action 2010, and other applicable anti-corruption laws, regulations and prohibitions against corruption (the "Anti-Corruption Laws") of the Business Intermediary designed to assess the prospective Business Intermediary's competence, expertise, and reputation, as well as any contacts it may have with Government officials.

[p.2]

E. Government Relationships

1. Is any owner, officer, manager, agent, affiliate, or employee of the Company an employee or official of any government agency, department or instrumentality; political party; public international organization; a candidate for political office; or member of a royal family?

If yes, please provide details

2. Does any owner, officer, manager, agent, affiliate, or employee of the Company have a familial or other close personal relationship with any employee or official of any government agency, department or instrumentality; political party; public international organization; candidate for political office; or member of a royal family?

If yes, please provide details

3. Is the Company owned or controlled by any government or government-owned or controlled instrumentality; public international organization; political party; candidate for political office; or member of a royal family?

If yes, please describe the government or royal family ownership or controlling interest

4. Does or will any government official or government employee; employee of a public international organization; political party official; or member of a royal family have any financial interest in, or receive any financial or other benefits from, any contract or project involving the Company and Booz Allen Hamilton Inc.?

If Yes, please describe

5. With respect to officials or employees of a government agency, department or instrumentality; officials or employees a public international organization; political party officials; candidates for political office; or members of a royal family, do you provide (a) gifts, entertainment, hospitalities or investment opportunities provided to the individual(s) or their relatives; (b) reimbursed expenses or payments of per diems, commissions or retainers directly to foreign officials, political party officials or royal family members in connection with promotional or investment opportunities; (c) payments to charitable organizations or other third-party payments directed or headed by foreign officials and (d) business ventures entered directly by the Company or other business partners with government officials or their relatives?

If Yes, please describe

F. Compliance and Business Ethics

1. Does the Company have a written code, procedure or policy addressing business ethics, including but not limited to policies and procedures relating to Anti-Corruption Laws and related issues? For purposes of this document, the term "Anti-Corruption Laws" refers to relevant local anti-corruption or anti-bribery laws and the U.S. Foreign Corrupt Practices Act (the "FCPA").

[p.3]

If yes, please provide a copy of the written code, procedure, or policy

2. How are the code and policies distributed?

Are certifications required by all employees on a one-time basis or annually?

If yes, provide a copy of the form(s) of certification.

3. Does the Company conduct regular training relating to business ethics, including but not limited to Anti-Corruption Laws?

If Yes, how regularly is such training conducted?

4. Does the Company maintain any type of hotline/helpline for raising concerns or asking questions or legal compliance issues?

If Yes, please describe

5. Does the Company have a regular internal audit function that includes regular audits of legal compliance issues?

G. Government Investigations

1. Has the Company, or any of its owners, officers, agents or employees, been the subject or target (within the past ten years) of any formal or informal inquiries or allegations, investigations, criminal charges or prosecution from government authorities in any jurisdiction relating to fraud, misrepresentation, bribery, corruption, tax evasion or other related activities?

If Yes, please describe the nature of the formal or informal inquiry, investigation or criminal prosecution.

2. Has the Company, or any of its owners, officers, agents or employees, been suspended from doing business in any capacity (within the past 10 years) in any jurisdiction?

If Yes, please describe the nature of the suspension.

[p.4] J. References

Please provide the names of three (3) references.

K. Compliance Certification

The Company understands that Booz Allen Hamilton Inc. will rely on the above information and other business information provided by the Company and that, in addition to any other remedies that may be available, any false or misleading information provided by the Company shall be grounds for the immediate termination of any agreement and/or relationship between Booz Allen Hamilton Inc. and the Company.

Company Name

Signature

Printed Name

Title

Date

* These sections are only required for:

- (1) Business Development, Joint Venture Partners, and Strategic Alliance agreements (regardless of performance location);
- (2) Agreements where performance includes direct interaction with government officials (regardless of performance location); and/or
- (3) Performance in the following countries: Afghanistan, Albania, Algeria, Angola, Argentina, Armenia, Azerbaijan, Bahrain, Bangladesh, Benin, Belarus, Bolivia, Bosnia and Herzegovina, Brazil, Bulgaria, Burkina Faso, Burundi, Cambodia, Cameroon, Central African Republic, Chad, China, Colombia, Comoros, Democratic Republic of Congo, Republic of Congo, Cote d'Ivoire, Croatia, Djibouti,

[List of countries continues]

Question
7.1.3 Does the company aim to establish the ultimate beneficial ownership of its agents and intermediaries?
Score
1
Comments
<p>There is evidence that the company's due diligence process specifically includes procedures to establish the ultimate beneficial ownership of agents and intermediaries. The company indicates that it does this through a pre-agreement questionnaire, and there is evidence that the company will not engage or terminate its engagement with agents and intermediaries in situations where beneficial ownership cannot be established.</p> <p>However, it is not clear from publicly available information that the company has procedures in place to independently verify beneficial ownership information provided by any agents or intermediaries identified as high risk. In addition, there is no publicly available evidence that the company conducts and reviews this information specifically at least every two years or when there is a significant change in the business relationship.</p>
Evidence
<p>[12] Working with Ethical Business Intermediaries (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries.pdf [p.1] Booz Allen has zero tolerance for, and does not engage in, bribery or corruption. We expect our business partners to operate in a manner that is consistent and compliant with the law, our values, and the Booz Allen Hamilton Code of Business Ethics and Conduct. We conduct appropriate anticorruption due diligence of potential business intermediaries that engage in certain activities on our behalf, and we do not engage in business activities with these business intermediaries without the appropriate approvals.</p> <p>[...]</p> <p>SUMMARY OF POLICY Booz Allen's Working with Ethical Business Intermediaries policy covers all of the following content in detail:</p> <p>[...]</p> <ul style="list-style-type: none"> • Prescribes cadence for continuous due diligence reviews after an agreement with a business intermediary is reached • Addresses special requirements for review of business development agents and related agreements <p>[13] Business Intermediary Questionnaire (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries-questionnaire.pdf [p.1] Booz Allen is committed to leading in ethics and conducting business honestly, ethically and with integrity. Booz Allen reviews its relationships with Business Intermediaries to assess any risks posed by interactions between the Business Intermediary and other individuals on Booz Allen's behalf. Before Booz Allen will make any commitment (verbal or written) to a prospective Business Intermediary, and as a pre-condition to entering into any agreement, making any payment under any such agreement, or committing to or entering into final negotiations regarding any amendment to any agreement that materially increases Booz Allen's anti-corruption risks, Booz Allen will conduct a due diligence review in accordance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Action 2010, and other applicable anti-corruption laws, regulations and prohibitions against corruption (the "Anti-Corruption Laws") of the Business Intermediary designed to assess the prospective Business Intermediary's competence, expertise, and reputation, as well as any contacts it may have with Government officials.</p>

B. Affiliated Companies
<i>Please provide the following information:</i>
Parent Company
Subsidiaries
Sister Companies
Other Affiliated Companies
Joint Ventures or Similar Entities

C. Company Ownership and Management
<p>1. Please identify the owner(s) of the Company, their nationality and percentage of ownership interest. If a business entity owns any portion of the Company, please trace ownership of all such entities back through as many layers as necessary to identify all ultimate individual owners of such entities. For any company in the chain of ownership that is traded on the NYSE, NASDAQ, or London Stock Exchange ("LSE"), this information is not required.</p> <div style="background-color: #e6f2ff; height: 40px; margin-top: 5px;"></div>
<p>2. Please identify the principal officers and directors of the Company, their title, nationality, and percentage of ownership.</p> <div style="background-color: #e6f2ff; height: 40px; margin-top: 5px;"></div>
<p>3. Please identify any other individuals that have a beneficial interest in the Company or in its revenues or profits.</p> <div style="background-color: #e6f2ff; height: 40px; margin-top: 5px;"></div>

[p.2]

E. Government Relationships
<p>1. Is any owner, officer, manager, agent, affiliate, or employee of the Company an employee or official of any government agency, department or instrumentality; political party; public international organization; a candidate for political office; or member of a royal family?</p> <p style="margin-left: 20px;">If yes, please provide details</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div>
<p>2. Does any owner, officer, manager, agent, affiliate, or employee of the Company have a familial or other close personal relationship with any employee or official of any government agency, department or instrumentality; political party; public international organization; candidate for political office; or member of a royal family?</p> <p style="margin-left: 20px;">If yes, please provide details</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div>
<p>3. Is the Company owned or controlled by any government or government-owned or controlled instrumentality; public international organization; political party; candidate for political office; or member of a royal family?</p> <p style="margin-left: 20px;">If yes, please describe the government or royal family ownership or controlling interest</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div>
<p>4. Does or will any government official or government employee; employee of a public international organization; political party official; or member of a royal family have any financial interest in, or receive any financial or other benefits from, any contract or project involving the Company and Booz Allen Hamilton Inc.?</p> <p style="margin-left: 20px;">If Yes, please describe</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div>
<p>5. With respect to officials or employees of a government agency, department or instrumentality; officials or employees a public international organization; political party officials; candidates for political office; or members of a royal family, do you provide (a) gifts, entertainment, hospitalities or investment opportunities provided to the individual(s) or their relatives; (b) reimbursed expenses or payments of per diems, commissions or retainers directly to foreign officials, political party officials or royal family members in connection with promotional or investment opportunities; (c) payments to charitable organizations or other third-party payments directed or headed by foreign officials and (d) business ventures entered directly by the Company or other business partners with government officials or their relatives?</p> <p style="margin-left: 20px;">If Yes, please describe</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div>

Question
7.1.4 Does the company's anti-bribery and corruption policy apply to all agents and intermediaries acting for or on behalf of the company, and does it require anti-bribery and corruption clauses in its contracts with these entities?
Score
0
Comments
<p>There is evidence that the company's anti-bribery and corruption policy applies to agents, intermediaries and other entities working on its behalf. However, there is no publicly available evidence that the company includes anti-bribery and corruption clauses in its contracts with agents and intermediaries, nor that its contracts include clear audit and termination rights to detect, prevent and control breaches.</p>
Evidence
<p>[2] Code of Business Ethics and Conduct (Document) Accessed 03/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf [p.6] And while we comply with all applicable laws—this is true wherever we work around the world— complying with the law is just the beginning. We also demand that our actions, and those of our colleagues and others we do business with, reflect our values, even when it's difficult. Our Code represents these values in action and applies to all employees, officers, directors, contractors, consultants, and others working on our behalf.</p> <p>[12] Working with Ethical Business Intermediaries (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries.pdf [p.1] Booz Allen has zero tolerance for, and does not engage in, bribery or corruption. We expect our business partners to operate in a manner that is consistent and compliant with the law, our values, and the Booz Allen Hamilton Code of Business Ethics and Conduct.</p> <p>[...]</p> <p>SUMMARY OF POLICY Booz Allen's Working with Ethical Business Intermediaries policy covers all of the following content in detail:</p> <p>[...]</p> <ul style="list-style-type: none"> • Explains aspects of business intermediary agreements with the firm • Establishes certain requirements for using business intermediaries including monitoring, approving payments and managing agreement changes <p>[...]</p> <ul style="list-style-type: none"> • Addresses special requirements for review of business development agents and related agreements • 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

Question
7.1.5 Does the company ensure that its incentive schemes for agents are designed in such a way that they promote ethical behaviour and discourage corrupt practices?
Score
1
Comments
<p>There is evidence that the company recognises incentive structures as a risk factor in agent behaviour, by stipulating a specific approval procedure for payments to such entities.</p> <p>However, there is no further publicly available evidence that incentives for agents are designed to promote ethical behaviour and discourage corrupt practices, for example by imposing a threshold on the payment of sales commissions to agents, or by requiring that remuneration is paid in stages and into local bank accounts.</p>
Evidence
<p>[12] Working with Ethical Business Intermediaries (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries.pdf [p.1] The purpose of this policy is to establish requirements for (i) reviewing business intermediaries prior to doing business with them to confirm that their ethical standards align with Booz Allen's, and (ii) reviewing billing statements from business intermediaries to ensure they are operating on our behalf in a manner consistent with our ethical standards.</p> <p>SUMMARY OF POLICY Booz Allen's Working with Ethical Business Intermediaries policy covers all of the following content in detail:</p> <p>[...]</p> <ul style="list-style-type: none"> • Explains aspects of business intermediary agreements with the firm • Establishes certain requirements for using business intermediaries including monitoring, approving payments and managing agreement changes

Question
7.1.6 Does the company publish details of all agents currently contracted to act with and on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the agents currently contracted to act for or on its behalf.
Evidence
No evidence found.

Question
7.1.7 Does the company publish high-level results from incident investigations and sanctions applied against agents?
Score
0
Comments
There is no evidence that the company publishes any data on ethical or bribery and corruption related investigations, incidents or the associated disciplinary actions involving agents.
Evidence
No evidence found.

7.2 Joint Ventures

Question							
7.2.1 Does the company conduct risk-based anti-bribery and corruption due diligence when entering into and operating as part of joint ventures?							
Score							
1							
Comments							
<p>There is evidence that the company has formal procedures to conduct risk-based anti-bribery and corruption due diligence prior to entering and while operating in a joint venture, and that this process includes checks on the ultimate beneficial ownership of the partner company.</p> <p>However, it is not clear from publicly available information whether joint ventures operating in high risk markets or with high risk partners, such as state-owned enterprises, are subject to enhanced due diligence. In addition, there is no evidence that the due diligence process is repeated at least every two years.</p>							
Evidence							
<p>[13] Business Intermediary Questionnaire (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries-questionnaire.pdf [p.1] Booz Allen is committed to leading in ethics and conducting business honestly, ethically and with integrity. Booz Allen reviews its relationships with Business Intermediaries to assess any risks posed by interactions between the Business Intermediary and other individuals on Booz Allen's behalf. Before Booz Allen will make any commitment (verbal or written) to a prospective Business Intermediary, and as a pre-condition to entering into any agreement, making any payment under any such agreement, or committing to or entering into final negotiations regarding any amendment to any agreement that materially increases Booz Allen's anti-corruption risks, Booz Allen will conduct a due diligence review in accordance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Action 2010, and other applicable anti-corruption laws, regulations and prohibitions against corruption (the "Anti-Corruption Laws") of the Business Intermediary designed to assess the prospective Business Intermediary's competence, expertise, and reputation, as well as any contacts it may have with Government officials.</p> <p>[...]</p>							
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[p.2]

E. Government Relationships

1. Is any owner, officer, manager, agent, affiliate, or employee of the Company an employee or official of any government agency, department or instrumentality; political party; public international organization; a candidate for political office; or member of a royal family?

If yes, please provide details

2. Does any owner, officer, manager, agent, affiliate, or employee of the Company have a familial or other close personal relationship with any employee or official of any government agency, department or instrumentality; political party; public international organization; candidate for political office; or member of a royal family?

If yes, please provide details

3. Is the Company owned or controlled by any government or government-owned or controlled instrumentality; public international organization; political party; candidate for political office; or member of a royal family?

If yes, please describe the government or royal family ownership or controlling interest

4. Does or will any government official or government employee; employee of a public international organization; political party official; or member of a royal family have any financial interest in, or receive any financial or other benefits from, any contract or project involving the Company and Booz Allen Hamilton Inc.?

If Yes, please describe

5. With respect to officials or employees of a government agency, department or instrumentality; officials or employees a public international organization; political party officials; candidates for political office; or members of a royal family, do you provide (a) gifts, entertainment, hospitalities or investment opportunities provided to the individual(s) or their relatives; (b) reimbursed expenses or payments of per diems, commissions or retainers directly to foreign officials, political party officials or royal family members in connection with promotional or investment opportunities; (c) payments to charitable organizations or other third-party payments directed or headed by foreign officials and (d) business ventures entered directly by the Company or other business partners with government officials or their relatives?

If Yes, please describe

F. Compliance and Business Ethics

1. Does the Company have a written code, procedure or policy addressing business ethics, including but not limited to policies and procedures relating to Anti-Corruption Laws and related issues? For purposes of this document, the term "Anti-Corruption Laws" refers to relevant local anti-corruption or anti-bribery laws and the U.S. Foreign Corrupt Practices Act (the "FCPA").

[p.3]

<p>If yes, please provide a copy of the written code, procedure, or policy</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div>	
<p>2. How are the code and policies distributed?</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div> <p>Are certifications required by all employees on a one-time basis or annually?</p> <p>If yes, provide a copy of the form(s) of certification.</p>	
<p>3. Does the Company conduct regular training relating to business ethics, including but not limited to Anti-Corruption Laws?</p> <p>If Yes, how regularly is such training conducted?</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div>	
<p>4. Does the Company maintain any type of hotline/helpline for raising concerns or asking questions or legal compliance issues?</p> <p>If Yes, please describe</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div>	
<p>5. Does the Company have a regular internal audit function that includes regular audits of legal compliance issues?</p>	
G. Government Investigations	
<p>1. Has the Company, or any of its owners, officers, agents or employees, been the subject or target (within the past ten years) of any formal or informal inquiries or allegations, investigations, criminal charges or prosecution from government authorities in any jurisdiction relating to fraud, misrepresentation, bribery, corruption, tax evasion or other related activities?</p> <p>If Yes, please describe the nature of the formal or informal inquiry, investigation or criminal prosecution.</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div>	
<p>2. Has the Company, or any of its owners, officers, agents or employees, been suspended from doing business in any capacity (within the past 10 years) in any jurisdiction?</p> <p>If Yes, please describe the nature of the suspension.</p> <div style="background-color: #e6f2ff; height: 20px; margin-top: 5px;"></div>	
<p>[p.4] J. References</p> <p>Please provide the names of three (3) references.</p>	
K. Compliance Certification	
<p>The Company understands that Booz Allen Hamilton Inc. will rely on the above information and other business information provided by the Company and that, in addition to any other remedies that may be available, any false or misleading information provided by the Company shall be grounds for the immediate termination of any agreement and/or relationship between Booz Allen Hamilton Inc. and the Company.</p> <div style="margin-top: 10px;"> <div style="display: flex; justify-content: flex-start;"> <div style="width: 150px; border-right: 1px solid black; padding-right: 5px; margin-right: 5px;">Company Name</div> <div style="border-bottom: 1px solid black; flex-grow: 1;"></div> </div> <div style="display: flex; justify-content: flex-start; margin-top: 5px;"> <div style="width: 150px; border-right: 1px solid black; padding-right: 5px; margin-right: 5px;">Signature</div> <div style="border-bottom: 1px solid black; flex-grow: 1;"></div> </div> <div style="display: flex; justify-content: flex-start; margin-top: 5px;"> <div style="width: 150px; border-right: 1px solid black; padding-right: 5px; margin-right: 5px;">Printed Name</div> <div style="border-bottom: 1px solid black; flex-grow: 1;"></div> </div> <div style="display: flex; justify-content: flex-start; margin-top: 5px;"> <div style="width: 150px; border-right: 1px solid black; padding-right: 5px; margin-right: 5px;">Title</div> <div style="border-bottom: 1px solid black; flex-grow: 1;"></div> </div> <div style="display: flex; justify-content: flex-start; margin-top: 5px;"> <div style="width: 150px; border-right: 1px solid black; padding-right: 5px; margin-right: 5px;">Date</div> <div style="border-bottom: 1px solid black; flex-grow: 1;"></div> </div> </div>	
<p>* These sections are only required for:</p> <p>(1) Business Development, Joint Venture Partners, and Strategic Alliance agreements (regardless of performance location);</p> <p>(2) Agreements where performance includes direct interaction with government officials (regardless of performance location); and/or</p> <p>(3) Performance in the following countries: Afghanistan, Albania, Algeria, Angola, Argentina, Armenia, Azerbaijan, Bahrain, Bangladesh, Benin, Belarus, Bolivia, Bosnia and Herzegovina, Brazil, Bulgaria, Burkina Faso, Burundi, Cambodia, Cameroon, Central African Republic, Chad, China, Colombia, Comoros, Democratic Republic of Congo, Republic of Congo, Cote d'Ivoire, Croatia, Djibouti,</p> <p>[List of countries continues]</p>	

Question									
7.2.2 Does the company commit to incorporating anti-bribery and corruption policies and procedures in all of its joint venture partnerships, and does it require anti-bribery and corruption clauses in its contracts with joint venture partners?									
Score									
0									
Comments									
There is some evidence that the company commits to establishing anti-bribery and corruption policies and procedures in its joint ventures. However, there is no publicly available evidence that the company requires anti-bribery and corruption clauses in its contracts with joint venture partners nor that such clauses include clear audit and termination rights to detect, control and prevent breaches.									
Evidence									
<p>[13] Business Intermediary Questionnaire (Document) Accessed 04/09/2019 https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries-questionnaire.pdf</p> <p>[p.1] Booz Allen is committed to leading in ethics and conducting business honestly, ethically and with integrity. Booz Allen reviews its relationships with Business Intermediaries to assess any risks posed by interactions between the Business Intermediary and other individuals on Booz Allen's behalf. Before Booz Allen will make any commitment (verbal or written) to a prospective Business Intermediary, and as a pre-condition to entering into any agreement, making any payment under any such agreement, or committing to or entering into final negotiations regarding any amendment to any agreement that materially increases Booz Allen's anti-corruption risks, Booz Allen will conduct a due diligence review in accordance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Action 2010, and other applicable anti-corruption laws, regulations and prohibitions against corruption (the "Anti-Corruption Laws") of the Business Intermediary designed to assess the prospective Business Intermediary's competence, expertise, and reputation, as well as any contacts it may have with Government officials.</p> <p>[p.2] F. Compliance and Business Ethics</p> <p>1. Does the Company have a written code, procedure or policy addressing business ethics, including but not limited to policies and procedures relating to Anti-Corruption Laws and related issues? For purposes of this document, the term "Anti-Corruption Laws" refers to relevant local anti-corruption or anti-bribery laws and the U.S. Foreign Corrupt Practices Act (the "FCPA").</p> <p>[p.3]</p> <table border="1"> <tr> <td>If yes, please provide a copy of the written code, procedure, or policy</td></tr> <tr> <td>2. How are the code and policies distributed?</td></tr> <tr> <td>Are certifications required by all employees on a one-time basis or annually?</td></tr> <tr> <td>If yes, provide a copy of the form(s) of certification.</td></tr> <tr> <td>3. Does the Company conduct regular training relating to business ethics, including but not limited to Anti-Corruption Laws?</td></tr> <tr> <td>If Yes, how regularly is such training conducted?</td></tr> <tr> <td>4. Does the Company maintain any type of hotline/helpline for raising concerns or asking questions or legal compliance issues?</td></tr> <tr> <td>If Yes, please describe</td></tr> <tr> <td>5. Does the Company have a regular internal audit function that includes regular audits of legal compliance issues?</td></tr> </table>	If yes, please provide a copy of the written code, procedure, or policy	2. How are the code and policies distributed?	Are certifications required by all employees on a one-time basis or annually?	If yes, provide a copy of the form(s) of certification.	3. Does the Company conduct regular training relating to business ethics, including but not limited to Anti-Corruption Laws?	If Yes, how regularly is such training conducted?	4. Does the Company maintain any type of hotline/helpline for raising concerns or asking questions or legal compliance issues?	If Yes, please describe	5. Does the Company have a regular internal audit function that includes regular audits of legal compliance issues?
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4. Does the Company maintain any type of hotline/helpline for raising concerns or asking questions or legal compliance issues?									
If Yes, please describe									
5. Does the Company have a regular internal audit function that includes regular audits of legal compliance issues?									

Question
7.2.3 Does the company commit to take an active role in preventing bribery and corruption in all of its joint ventures?
Score
0
Comments
There is no publicly available evidence that the company commits to take an active role in preventing bribery and corruption in all of its joint ventures, for example by providing training to employees of joint ventures or implementing a policy to second senior individuals to the partner company's management board.
Evidence
No evidence found.

8. Offsets

Question
8.1 Does the company explicitly address the corruption risks associated with offset contracting, and is a dedicated body, department or team responsible for oversight of the company's offset activities?
Score
0
Comments
There is no publicly available evidence that the company addresses the corruption risks associated with offset contracting, nor is there evidence that a dedicated body, department or team is responsible for oversight of its offset activities.
Evidence
No evidence found.

Question
8.2 Does the company conduct risk-based anti-bribery and corruption due diligence on all aspects of its offset obligations, which includes an assessment of the legitimate business rationale for the investment?
Score
0
Comments
There is no evidence that the company has formal procedures in place to conduct risk-based anti-bribery and corruption due diligence on its offset obligations. The company provides some information on its approach to due diligence in relation to third parties, but it is not clear from publicly available information that this process applies to offset partners or to other aspects of an offset obligation.
Evidence
<p>[31] Anticorruption and Anti-Bribery Policy (Webpage) Accessed 23/04/2020 https://ethics.bah.com/policy-library/anticorruption-and-anti-bribery-policy Booz Allen people must also comply with the following rules:</p> <p>Working with Third Parties: Before Booz Allen will make any commitment (verbal or written) to a prospective third party that will perform client-facing work outside of the United States or interact with a non-U.S. government agency on Booz Allen's behalf ("Business Intermediary"), and as a pre-condition to entering into any agreement or making any payment under any such agreement, Booz Allen will conduct anticorruption due diligence review of the Business Intermediary designed to assess the Business Intermediary's ethics and compliance reputation, as well as any contacts it may have with any government official. Business Intermediaries include certain business development agents, prime contractors, subcontractors, independent consultants, representatives, customs brokers, advisors (including lawyers or accountants), joint venture partners, and teaming or alliance partners. See the Working with Ethical Business Intermediaries Policy for additional information and guidance.</p>

Question
8.3 Does the company publish details of all offset agents and brokers currently contracted to act with and/or on behalf of the company?
Score
0
Comments
There is no evidence that the company publishes any details of the offset agents, brokers or consultancy firms currently contracted to act with and on behalf of its offset programme.
Evidence
No evidence found.

Question
8.4 Does the company publish details about the beneficiaries of its indirect offset projects?
Score
0
Comments
There is no evidence that the company publishes any details of its offset obligations, nor does it publicly indicate that it has not engaged in such activities in the most recently reported financial year.
Evidence
No evidence found.

9. High Risk Markets

Question
9.1 Does the company have enhanced risk management procedures in place for the supply of goods or services to markets or customers in countries identified as at a high risk of corruption?
Score
2
Comments
<p>There is evidence that the company acknowledges the corruption risks associated with operating in different markets, and there is evidence that it has a risk assessment process in place to account for these specific risks, with clear risk management procedures in place. The results of risk assessments have a direct impact on business decisions and inform the development and implementation of additional controls. The company provides some examples of possible controls.</p>
Evidence
<p>[1] Anti-Corruption and Anti-Bribery Compliance Programme Homepage (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics/anticorruption-and-anti-bribery-compliance-program.html Our Anticorruption and Anti-Bribery compliance program is designed to identify and address corruption risks that may arise based on business activities in which we engage, geographies in which we operate, and industries and clients we serve. As the larger business and geopolitical context changes, we stay attuned to shifts in laws, regulations, and enforcement practice.</p> <p>[4] Ethics and Compliance at Booze Allen (Webpage) Accessed 03/09/2019 https://www.boozallen.com/about/ethics.html Informed through regular risk assessments Ethics & Compliance coordinates with our enterprise risk management and business teams to proactively identify new compliance risks and conduct comprehensive risk assessments and benchmarking exercises regularly for our key and emerging compliance risk areas. This enables us to identify requirements and risk, determine whether the program is designed to address these requirements and risks, and assess whether the program is operating as designed. Risks identified during these assessments are addressed through tailored program enhancements.</p> <p>[16] 10K Annual Report 2019 (Document) Accessed 10/09/2019 https://investors.boozallen.com/static-files/30f6e790-55d5-4ef5-868d-3602c3f66eed [p.26] In addition, we are subject to the U.S. Foreign Corrupt Practices Act, or the FCPA, and other laws that prohibit improper payments or offers of payments to foreign governments and their officials and political parties by business entities for the purpose of obtaining or retaining business. We have operations and deal with governmental clients in countries known to experience corruption, including certain emerging countries in the Middle East and Southeast Asia. Our activities in these countries create the risk of unauthorized payments or offers of payments by one of our employees, consultants or contractors that could be in violation of various laws including the FCPA and other anti-corruption laws, even though these parties are not always subject to our control.</p> <p>[...]</p> <p>Changes to our operating structure, capabilities or strategy intended to address our clients' needs, respond to developments in our markets and grow our business may not be successful.</p> <p>[...]</p> <p>The implementation of changes to our operating structure, capabilities, strategy or any other aspect of our business following an internal review, may materially alter various aspects of our business or our business model as an entirety and there can be no assurance that any such changes will be successful or that they will not ultimately have a negative effect on our business and results of operations.</p>

[13] Business Intermediary Questionnaire (Document)

Accessed 04/09/2019

https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries-questionnaire.pdf

[p.1] Booz Allen is committed to leading in ethics and conducting business honestly, ethically and with integrity. Booz Allen reviews its relationships with Business Intermediaries to assess any risks posed by interactions between the Business Intermediary and other individuals on Booz Allen's behalf. Before Booz Allen will make any commitment (verbal or written) to a prospective Business Intermediary, and as a pre-condition to entering into any agreement, making any payment under any such agreement, or committing to or entering into final negotiations regarding any amendment to any agreement that materially increases Booz Allen's anti-corruption risks, Booz Allen will conduct a due diligence review in accordance with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Action 2010, and other applicable anti-corruption laws, regulations and prohibitions against corruption (the "Anti-Corruption Laws") of the Business Intermediary designed to assess the prospective Business Intermediary's competence, expertise, and reputation, as well as any contacts it may have with Government officials.

[p.3] I. Financial Statements/ Authorization to do Business *

1. Please provide evidence of authorization of the Company to do business, including proof of establishment or incorporation.

[p.4] Please attach copies of banking documents indicating all owners and signators of any bank account into which payment to the Company will be made. A letter from the relevant bank will satisfy this requirement.

J. References *

1. Please provide the names and contact information of three (3) references.

K. Compliance Certification

The Company understands that Booz Allen Hamilton Inc. will rely on the above information and other business information provided by the Company and that, in addition to any other remedies that may be available, any false or misleading information provided by the Company shall be grounds for the immediate termination of any agreement and/or relationship between Booz Allen Hamilton Inc. and the Company.

Company Name	<input type="text"/>
Signature	<input type="text"/>
Printed Name	<input type="text"/>
Title	<input type="text"/>
Date	<input type="text"/>

*** These sections are only required for:**

- (1) Business Development, Joint Venture Partners, and Strategic Alliance agreements (regardless of performance location);
- (2) Agreements where performance includes direct interaction with government officials (regardless of performance location); and/or
- (3) Performance in the following countries: Afghanistan, Albania, Algeria, Angola, Argentina, Armenia, Azerbaijan, Bahrain, Bangladesh, Benin, Belarus, Bolivia, Bosnia and Herzegovina, Brazil, Bulgaria, Burkina Faso, Burundi, Cambodia, Cameroon, Central African Republic, Chad, China, Colombia, Comoros, Democratic Republic of Congo, Republic of Congo, Cote d'Ivoire, Croatia, Djibouti,

[List of countries continues]

Question																																
9.2 Does the company disclose details of all of its fully consolidated subsidiaries and non-fully consolidated holdings (associates, joint ventures and other related entities)?																																
Score																																
1																																
Comments																																
<p>There is evidence that the company publishes a list of subsidiaries, which includes details of the jurisdiction or country of incorporation for each entity. This list is published on an annual basis as part of the company’s reporting and is accompanied by a statement that it is complete at the time of publication to the best of the company’s knowledge.</p> <p>However, there is no publicly available evidence that the company publishes further details of its percentage ownership in each entity, nor the relevant country or countries of operation. It is therefore not clear from publicly available information that this list represents all of the company’s fully and non-fully consolidated holdings such as associates, joint ventures and other entities.</p>																																
Evidence																																
<p>[16] 10K Annual Report 2019 (Document) Accessed 10/09/2019 https://investors.boozallen.com/static-files/30f6e790-55d5-4ef5-868d-3602c3f66eed [p.198] Exhibit 21</p> <p>List of Subsidiaries of Booz Allen Hamilton Holding Corporation</p> <table><tr><th>Name</th><th>Jurisdiction of Organization</th></tr><tr><td>Booz Allen Cyber Solutions, LLC</td><td>Delaware</td></tr><tr><td>Booz Allen Hamilton Consulting Pte. Ltd.</td><td>Singapore</td></tr><tr><td>Booz Allen Hamilton (Dubai) Limited</td><td>Dubai, UAE</td></tr><tr><td>Booz Allen Hamilton Egypt, LLC</td><td>Egypt</td></tr><tr><td>Booz Allen Hamilton Engineering Holding Co., LLC</td><td>Delaware</td></tr><tr><td>Booz Allen Hamilton Engineering Services, LLC</td><td>Delaware</td></tr><tr><td>Booz Allen Hamilton Lebanon S.a.r.l.</td><td>Lebanon</td></tr><tr><td>Booz Allen Hamilton Inc.</td><td>Delaware</td></tr><tr><td>Booz Allen Hamilton Intellectual Property Holdings, LLC</td><td>Delaware</td></tr><tr><td>Booz Allen Hamilton International, Inc.</td><td>Delaware</td></tr><tr><td>Booz Allen Hamilton International Pte. Ltd.</td><td>Singapore</td></tr><tr><td>Booz Allen Hamilton International (U.K.) Ltd.</td><td>United Kingdom</td></tr><tr><td>Booz Allen Hamilton Investor Corporation</td><td>Delaware</td></tr><tr><td>Booz Allen Hamilton Netherlands BV</td><td>Netherlands</td></tr><tr><td>Booz Allen Hamilton Philippines Inc.</td><td>Philippines</td></tr></table> <p>[Page lists further companies]</p> <p>[p.200] Exhibit 31.1</p> <p>CERTIFICATION OF THE CHIEF EXECUTIVE OFFICER PURSUANT TO RULE 13A-14(A) OF THE SECURITIES EXCHANGE ACT OF 1934, AS AMENDED</p> <p>I, Horacio D. Rozanski, certify that:</p>	Name	Jurisdiction of Organization	Booz Allen Cyber Solutions, LLC	Delaware	Booz Allen Hamilton Consulting Pte. Ltd.	Singapore	Booz Allen Hamilton (Dubai) Limited	Dubai, UAE	Booz Allen Hamilton Egypt, LLC	Egypt	Booz Allen Hamilton Engineering Holding Co., LLC	Delaware	Booz Allen Hamilton Engineering Services, LLC	Delaware	Booz Allen Hamilton Lebanon S.a.r.l.	Lebanon	Booz Allen Hamilton Inc.	Delaware	Booz Allen Hamilton Intellectual Property Holdings, LLC	Delaware	Booz Allen Hamilton International, Inc.	Delaware	Booz Allen Hamilton International Pte. Ltd.	Singapore	Booz Allen Hamilton International (U.K.) Ltd.	United Kingdom	Booz Allen Hamilton Investor Corporation	Delaware	Booz Allen Hamilton Netherlands BV	Netherlands	Booz Allen Hamilton Philippines Inc.	Philippines
Name	Jurisdiction of Organization																															
Booz Allen Cyber Solutions, LLC	Delaware																															
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Booz Allen Hamilton Investor Corporation	Delaware																															
Booz Allen Hamilton Netherlands BV	Netherlands																															
Booz Allen Hamilton Philippines Inc.	Philippines																															

1. I have reviewed this Annual Report on Form 10-K of Booz Allen Hamilton Holding Corporation.
2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report.
3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report.

Question										
9.3 Does the company disclose its beneficial ownership and control structure?										
Score										
2										
Comments										
There is evidence that the company is publicly listed on the New York Stock Exchange (NYSE) and therefore it is not required to disclose further information on its beneficial ownership to receive a score of '2'.										
Evidence										
<p>[15] Financial Times Markets Data (Webpage) Accessed 22/04/2020 https://markets.ft.com/data/equities/tearsheet/summary?s=BAH:NYQ</p> <div><h1>Booz Allen Hamilton Holding Corp</h1><p>BAH:NYQ ▼</p><p>Industrials > Support Services</p><table><tr><th>PRICE (USD)</th><th>TODAY'S CHANGE</th><th>SHARES TRADED</th><th>1 YEAR CHANGE</th><th>BETA</th></tr><tr><td>73.87</td><td>↑ 0.38 / 0.52%</td><td>10.92k</td><td>↑ 28.51%</td><td>0.8608</td></tr></table><p>Data delayed at least 15 minutes, as of Apr 22 2020 14:33 BST.</p></div>	PRICE (USD)	TODAY'S CHANGE	SHARES TRADED	1 YEAR CHANGE	BETA	73.87	↑ 0.38 / 0.52%	10.92k	↑ 28.51%	0.8608
PRICE (USD)	TODAY'S CHANGE	SHARES TRADED	1 YEAR CHANGE	BETA						
73.87	↑ 0.38 / 0.52%	10.92k	↑ 28.51%	0.8608						

Question																								
9.4 Does the company publish a percentage breakdown of its defence sales by customer?																								
Score																								
1																								
Comments																								
<p>There is evidence that the company provides some information about its major customers, to indicate that the United States government and branches of the military account for a substantial portion of its defence sales. The company indicates that revenue from customers in the defence and intelligence sectors accounts for approximately 70% of its overall sales. There is evidence that this information is updated and published on an annual basis as part of the company's annual corporate reporting.</p> <p>However, the company receives a score of '1' because it does not provide further publicly available information to indicate the major customers for 80% or more of its defence sales.</p>																								
Evidence																								
<p>[16] 10K Annual Report 2019 (Document) Accessed 10/09/2019 https://investors.boozallen.com/static-files/30f6e790-55d5-4ef5-868d-3602c3f66eed [p.7] Highlights of Booz Allen's fiscal 2019 are as follows:</p> <ul style="list-style-type: none">• We derived 96% of our revenue from contracts where the end client was an agency or department of the U.S. government.• We delivered services under 4,709 contracts and task orders.• We derived 92% of our revenue in fiscal 2019 from engagements for which we acted as the prime contractor.• We derived 13% of our revenue in fiscal 2019 from the Navy Marine Corps, which was the single largest client that we served in that year. <p>Selected Long-Term Client Relationships</p> <table><tr><th>Client (1)</th><th>Relationship Length (Years)</th></tr><tr><td>U.S. Navy</td><td>75+</td></tr><tr><td>U.S. Army</td><td>70+</td></tr><tr><td>Department of Energy</td><td>40+</td></tr><tr><td>U.S. Air Force</td><td>40+</td></tr><tr><td>National Security Agency</td><td>35+</td></tr><tr><td>Department of Homeland Security</td><td>35+</td></tr><tr><td>Federal Bureau of Investigation</td><td>25+</td></tr><tr><td>Department of Health and Human Services</td><td>20+</td></tr><tr><td>National Reconnaissance Office</td><td>20+</td></tr><tr><td>A U.S. intelligence agency</td><td>20+</td></tr><tr><td>Internal Revenue Service</td><td>20+</td></tr></table> <p>[...]</p> <p>We count among our many defense and intelligence clients all four branches of the U.S. military, the Office of the Secretary of Defense, the Joint Staff and members of the intelligence community. Our key defense clients include the Army, Navy/Marine Corps, Air Force, and Joint Combatant Commands. Our key intelligence clients include U.S. intelligence agencies, such as the National Security Agency, National Geospatial-Intelligence Agency, and National Reconnaissance Office, and military intelligence agencies, such as the Defense Intelligence Agency, Service Intelligence Centers, and Intelligence Surveillance Reconnaissance units.</p>	Client (1)	Relationship Length (Years)	U.S. Navy	75+	U.S. Army	70+	Department of Energy	40+	U.S. Air Force	40+	National Security Agency	35+	Department of Homeland Security	35+	Federal Bureau of Investigation	25+	Department of Health and Human Services	20+	National Reconnaissance Office	20+	A U.S. intelligence agency	20+	Internal Revenue Service	20+
Client (1)	Relationship Length (Years)																							
U.S. Navy	75+																							
U.S. Army	70+																							
Department of Energy	40+																							
U.S. Air Force	40+																							
National Security Agency	35+																							
Department of Homeland Security	35+																							
Federal Bureau of Investigation	25+																							
Department of Health and Human Services	20+																							
National Reconnaissance Office	20+																							
A U.S. intelligence agency	20+																							
Internal Revenue Service	20+																							

Revenue generated from defense clients was \$3.1 billion, or approximately 46.6% of our revenue in fiscal 2019 as compared to \$2.8 billion, or approximately 45.9% of our revenue in fiscal 2018. Revenue generated from defense clients also includes foreign military sales to non-U.S. government clients. Revenue generated from intelligence clients was \$1.6 billion, or approximately 23.4% of our revenue in fiscal 2019 as compared to \$1.5 billion, or approximately 24.2% of our revenue in fiscal 2018.

[p.13] Risks Related to Our Business

We depend on contracts with U.S. government agencies for substantially all of our revenue. If our relationships with such agencies are harmed, our future revenue and operating profits would decline.

[p.14] The U.S. government is our primary client, with revenue from contracts and task orders, either as a prime or a subcontractor, with U.S. government agencies accounting for 96% of our revenue for fiscal 2019.

[p.84] Revenue by Customer Type:

	Fiscal Year Ended March 31,					
	2019		2018		2017	
U.S. government:						
Defense Clients	\$	3,114,571	47%	\$	2,830,102	46%
Intelligence Clients		1,566,870	23%		1,494,489	24%
Civil Clients		1,760,996	26%		1,644,860	27%
Total U.S. government		6,442,437	96%		5,969,451	97%
Global Commercial Clients		261,600	4%		198,149	3%
Total Revenue	\$	6,704,037	100%	\$	6,167,600	100%

10. State-Owned Enterprises (SOEs)

Question
10.1 Does the SOE publish a breakdown of its shareholder voting rights?
Score
N/A
Comments
N/A
Evidence

Question
10.2 Are the SOE's commercial and public policy objectives publicly available?
Score
N/A
Comments
N/A
Evidence

Question
10.3 Is the SOE open and transparent about the composition of its board and its nomination and appointment process?
Score
N/A
Comments
N/A
Evidence

Question
10.4 Is the SOE's audit committee composed of a majority of independent directors?
Score
N/A
Comments
N/A
Evidence

Question
10.5 Does the SOE have a system in place to assure itself that asset transactions follow a transparent process to ensure they accord to market value?
Score
N/A
Comments
N/A
Evidence

List of Evidence & Sources

No	Type (Webpage or Document)	Name	Download Date	Link
01	Webpage	Anti-Corruption and Anti-Bribery Compliance Programme Homepage	03/09/2019	https://www.boozallen.com/about/ethics/anticorrupti-on-and-anti-bribery-compliance-program.html
02	Document	Code of Business Ethics and Conduct	03/09/2019	https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/booz-allen-code-of-business-ethics-and-conduct.pdf
03	Document	Anti-Corruption Policy Summary	03/09/2019	https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/anti-bribery-corruption.pdf
04	Webpage	Ethics and Compliance at Booz Allen	03/09/2019	https://www.boozallen.com/about/ethics.html
05	Document	Recruiting, Hiring and Employee Referral Policy Summary	04/09/2019	https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/Recruiting-and-Hiring.pdf
06	Document	Mandatory Reporting and Non-Retaliation Policy	04/09/2019	https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/Mandatory-Reporting-and-Non-Retaliation.pdf
07	Document	Political Activities Statement	04/09/2019	https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/slick_sheet/booz-allen-political-activities.pdf
08	Document	United States FEC – Booz Allen Hamilton Inc. PAC	06/01/2021	https://www.fec.gov/data/committee/C00709816/?tab=about-committee
09	Webpage	Booz Allen Cares	04/09/2019	https://www.boozallen.com/e/insight/thought-leadership/booz-allen-cares.html
10	Document	Procurement of Products and Services Policy Summary	04/09/2019	https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/Procurement.pdf
11	Webpage	Supplier Code of Conduct	04/09/2019	https://www.boozallen.com/tools/utility-navigation-pages/government-contract-vehicles/supplier-code-of-conduct.html
12	Document	Working with Ethical Business Intermediaries	04/09/2019	https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries.pdf
13	Document	Business Intermediary Questionnaire	04/09/2019	https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/working-with-business-intermediaries-questionnaire.pdf
14	Document	10Q 2018	10/09/2019	https://investors.boozallen.com/static-files/30f6e790-55d5-4ef5-868d-3602c3f66eed
15	Webpage	FT Markets Data	22/04/2020	https://markets.ft.com/data/equities/tearsheet/summary?s=BAH:NYQ
16	Document	10K Annual Report 2019	10/09/2019	https://investors.boozallen.com/static-files/30f6e790-55d5-4ef5-868d-3602c3f66eed
17	Document	Code of Ethics for Senior Financial Officers	23/04/2020	https://investors.boozallen.com/static-files/cd226a59-a136-496e-a80c-de218ef5590b
18	Webpage	Chief Legal Officer Corporate Biography	23/04/2020	https://www.boozallen.com/e/bio/leadership/nancy-laben.html
19	Document	Audit Committee Charter	23/04/2020	https://investors.boozallen.com/static-files/34b24f1b-1a1c-4a97-b7ce-e1c218955476
20	Document	Corporate Governance Guidelines	23/04/2020	https://investors.boozallen.com/static-files/f908c0ad-6518-4e38-81d6-836b603e5aa5
21	Webpage	External Whistleblowing Website - FAQs	23/04/2020	https://secure.ethicspoint.com/domain/media/en/gui/38732/faq.html#q6
22	Webpage	External Whistleblowing Site	23/04/2020	https://secure.ethicspoint.com/domain/media/en/gui/38732/index.html

23	Webpage	Whistleblowing Report Submission Page	23/04/2020	https://secure.ethicspoint.com/domain/en/report_information.asp?locationid=-1&clientid=38732&override=yes&agreement=no&companyname=Booz%20Allen%20Hamilton&violationtypeid=27360
24	Webpage	Vendor Service Centre Website	23/04/2020	https://vendors.bah.com/
25	Document	Gifts and Business Courtesies	11/06/2020	https://www.boozallen.com/content/dam/boozallen_site/esg/pdf/policies/Gifts-and-Business-Courtesies.pdf
26	Webpage	United States Lobbying Disclosures Q4 2020 – Registrant: “Booz Allen Hamilton Inc”	01/02/2021	