



# Human Rights and Combating Trafficking in Persons

**SPONSORING ORGANIZATION:** Legal, Ethics & Compliance

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## INTRODUCTION

Human rights are the most fundamental rights that we have. Through this policy and along with the global community, Booz Allen continues its commitment to respecting human rights and working to stop actions that adversely impact these rights.

The purpose of this policy is to memorialize our commitment to respect human rights, prohibit and establish measures to prevent activities within our organization and in our supply chain that constitute or promote the trafficking of humans, forced labor, or other violations of human rights salient to Booz Allen's operations.

## SCOPE

The Business Continuity Program policy applies to all employees, officers, directors, independent contractors, subsidiaries, and affiliates of the firm (referred to as "Booz Allen people").

## POLICY

Human rights are at the heart of our Purpose and Values. We maintain our commitment to respecting human rights as they are defined by the United Nations Universal Declaration on Human Rights (UDHR), the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights at Work, United Nations Guiding Principles on Business and Human Rights (UNGP), and The Federal Acquisition Regulation (FAR).

When Booz Allen performs U.S. Government Contracts, we must comply with, and require those in our supply chain to comply with, the requirements to combat human trafficking that are at least as stringent as those specified in the FAR.

All Booz Allen employees and business partners are required to comply with laws and regulations, including U.S. Government laws and regulations, regarding combating trafficking in persons and trafficking-related activities. We condemn all forms of human trafficking and forced or coerced labor, and we do not engage in or tolerate such activities within our firm or throughout our supply chain.

As required by the FAR, Booz Allen prohibits all the following activities:

- Trafficking in persons
- Procurement of commercial sex acts
- Use of forced labor, slavery, or child labor
- Destroying, concealing, confiscating, or otherwise denying an employee access to the employee's identity or immigration documents
- Use of misleading or fraudulent practices during the recruitment of employees or offering of employment
- Using recruiters who do not comply with local labor laws.
- Charging employees recruitment fees
- Failing to provide or pay for return transportation to an employee's home country upon the end of employment
- Providing or arranging housing that fails to meet the host country housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement or other required work document in writing.

Booz Allen also provides employees who are required to relocate with appropriate work documentation at least five (5) days prior to the employee's relocation. Documentation will include details of the work description, wages, work

location(s), living accommodations and costs, time off, roundtrip transportation arrangements, and how to report a grievance, as well as a statement reflecting the firm's prohibition on charging recruitment fees and the content of any applicable laws and regulations prohibiting trafficking in persons.

In addition to FAR prohibited activities, Booz Allen maintains a commitment to respect the following human rights:

- Prevention of discrimination based on race, color, ethnicity, religion, sex (including pregnancy, childbirth, lactation, or related medical conditions), national origin, ancestry, age, marital status, sexual orientation, gender identity and expression, disability, veteran status, military or uniformed service member status, genetic information, or any other status protected by applicable federal, state, local, or international law
- Prevention of sexual harassment
- Prevention of torture and inhumane treatment
- Data privacy
- Right to water and sanitation
- Pay Equity
- Protection of minority groups' rights and women's rights
- Safe and healthy working environment

### **Corporate Compliance Plan**

Booz Allen maintains a Combatting Trafficking in Persons (CTIP) Corporate Compliance Plan (the "Plan") that establishes Booz Allen's corporate compliance standards related to this policy's prohibited activities. The Plan applies to all contracts for supplies, other than commercially available off-the-shelf items, acquired outside the United States, or services to be performed outside the United States that have an estimated value over \$550,000. When a contract-specific plan is required, Booz Allen will implement additional contract-specific controls to satisfy the contract requirements.

### **Supply Chain Enforcement**

Booz Allen requires its suppliers to accept the requirements of FAR 52.222-50 wherever applicable and to provide appropriate assurances of compliance to support our federal contracting requirements. Further, we engage in due diligence in the conduct of our operations and business relationships. Our supply chain due diligence process includes inquiry into compliance with the provisions of FAR 52.222-50 and is completed in advance of a formal purchase request submission.

### **Risk Monitoring**

We monitor our current and prospective business operations for risks that may contribute to adverse human rights impacts or violate our purpose and values.

### **Training**

Appropriate training on our purpose and values, including various human rights issues, is provided for all employees during completion of our mandatory ethics and compliance training.

### **Stakeholder Involvement**

We continue to encourage involvement from stakeholders including employees, partners, and suppliers in the performance of the policy, and/or the evaluation of effective outcomes of the policy's implementation. We seek feedback from clients and shareholders to evaluate and enhance our programs relevant to this policy.

### **Oversight**

The Booz Allen Hamilton Board of Directors, including the Chief Executive Officer, will provide appropriate oversight to ensure our business is conducted in accordance with human rights guidelines.

### **Policy Conflicts**

When Booz Allen conducts business outside the United States, we must also consider local laws. In the event of potential conflict between U.S. and local laws regarding human rights requirements, employees should notify Ethics & Compliance.

### **REPORTING CONCERNS**

Booz Allen maintains the highest standards of ethical behavior and integrity. Our policies, procedures, trainings, and communications form a robust Ethics & Compliance program, promoting a culture of integrity that shapes all

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facets of employee conduct.

Anyone can report an ethics concern to our Ethics HelpLine at +1-800-501-8755 (US) or +1-888-475-0009 (International) or [Speakup.bah.com](https://speakup.bah.com). Concerns may be raised anonymously.

We take all allegations of misconduct seriously, investigate them promptly, and strictly prohibit retaliation against any person who raises a good faith ethical or legal concern.