



## Cooperating with Investigations, Litigation and Making External Disclosures Policy

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

### INTRODUCTION

Booz Allen is committed to operating our business with integrity and in compliance with laws in all countries where we do business. We cooperate fully with government and internal investigations and other government oversight related to our business. Employee cooperation with both internal and external investigations is required to maintain this integrity.

The purpose of this policy is to outline the company's protocols for cooperating with investigations, participating in litigation in a professional capacity and making external disclosures, and to set forth the requirements and contact points for employees to cooperate with investigation

### SCOPE

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

### POLICY

An investigation is a process designed to gather information or collect facts. Investigations can be conducted by Booz Allen internally (which may include the assistance of outside counsel or other resources) or by external parties, such as government agencies. The objectives and scope of investigations vary widely, but their overriding purpose is to determine the relevant facts. This is accomplished by interviewing people, reviewing records and gathering data, information and documentation.

Internal investigations cover a wide range of issues and are typically initiated in response to specific allegations of misconduct or suspected irregularities. Although each investigation is unique and may be handled differently, all investigations are carried out in a fair and consistent manner. From time to time, the company may be involved in investigations being conducted by external parties such as government agencies.

Booz Allen people must cooperate fully with any internal investigation the company conducts and any external inspections, government oversight, investigations, and legal proceedings related to the company's business. The company will not impede Booz Allen people from communicating or cooperating with a government agency in accordance with applicable laws and regulations.

### External Investigations, Litigation and Inspections

When contacted by a government agency or any third-party that requests information or your participation in an investigation (e.g. appears to serve a subpoena or execute a search warrant) and/or legal proceeding (received a summons, called to appear in court) related to the company's business or your prior professional capacity, you must immediately contact the Litigation and Government Inquiries team.

In addition to contacting Litigation and Government Inquiries team, if you're contacted directly by one of the following entities you must notify the corresponding Booz Allen Point of Contact below.

Entity	Booz Allen Point of Contact:
DCAA or DCMA	Government Accounting Compliance
Small Business Administration	Small Business Office
Department of Labor	People Services
Defense Security Service (DSS)	Security Services: Security POCs

<b>Inspector General U.S. Security and Exchange Commission (SEC)</b>	<b>Ethics First</b> Ethics Helpline: 800-501-8755 (US); Country Access number + 888-475-0009 Secure internet portal at <a href="http://speakup.bah.com">http://speakup.bah.com</a>

**If you are contacted after hours, immediately notify the Crisis Response Hotline at 800-291-9955 US and 703- 319-3487 Internationally and then contact the Litigation and Government Inquiries team.**

When contacted by a government or third-party representative, you must ask them to provide valid agency or official identification. If you are uncertain about the identity of the representative, the investigation or the legal proceeding, contact the Litigation and Government Inquiries team for assistance.

#### Sharing Data with an External Investigator

Booz Allen people are prohibited from providing any documents or property (including laptops or any other company- issued device) to a government investigator or third party without direct approval from the Litigation and Government Inquiries team. If asked for documents, data, and other materials related to any matter subject to investigation or legal proceedings, contact Litigation and Government Inquiries and ask the Government investigator to direct the request to the Litigation and Government Inquiries team. The Litigation and Government Inquiries team will respond to the requesting party directly. If a Booz Allen person works with classified information or holds a security clearance, a DSS representative may interview that person one-on-one to determine whether they understand and are following the rules governing the access to and handling of classified information. In these situations, Booz Allen people must notify Security Services immediately of any requests from DSS.

#### **Internal Investigations**

All internal investigations are conducted and/or overseen by the Legal Department and will be treated in a confidential manner to the greatest extent possible. Employees must cooperate fully with any internal investigation and provide accurate, truthful and candid responses and all relevant information and documents promptly. In the company's discretion, employees who report allegations of potential misconduct may receive periodic feedback or status reports, to the extent possible, within confidentiality requirements.

#### **External Disclosures**

Booz Allen complies with all applicable legal and regulatory disclosure and cooperation obligations that apply to its business, and Booz Allen people must cooperate with the company when necessary to prepare a comprehensive disclosure. The Legal Department coordinates all the company's disclosures and cooperation with regulators, including properly disclosing and providing full cooperation to the government where it determines there is credible evidence of a violation of federal criminal law involving fraud, conflicts of interest, bribery, or gratuity violations; violations of the U.S. civil False Claims Act; or a significant overpayment under a U.S. federal contract. In addition, in coordination with the Legal Department, the company complies with required disclosure obligations arising under the U.S. Federal Anti-Kickback Act, anti-boycott and human trafficking statutes, and laws and regulations related to facility and personal security clearances and tax laws, among others. The Legal Department coordinates determinations of credible evidence and cooperation with the U.S. government on behalf of the company.

#### **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 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](http://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.