



Discipline for Misconduct Policy

SPONSORING ORGANIZATION: People Services

INTRODUCTION

Booz Allen takes all allegations of misconduct seriously, including violations of law, our company's Code of Business Ethics and Conduct, and our company policies. We investigate each allegation of misconduct fully and fairly and if substantiated, the company in its discretion may discipline the person(s) who engaged in the misconduct.

The purpose of this policy is to set forth Booz Allen's approach to determining the appropriate discipline for cases of misconduct, the factors in determining discipline, and the types of discipline.

SCOPE

The Discipline for Misconduct policy applies to all employees, officers, directors, independent contractors, subsidiaries, and affiliates of the company (referred to as "Booz Allen people").

POLICY

The company has appointed a rotating cross-functional group of senior leaders, known as the Disciplinary Action Committee (DAC), to determine the appropriate discipline for cases of misconduct. If a matter is particularly sensitive or urgent, the discipline determination may be made at the discretion of the Chief People Officer (CPO) or his/her designee. In addition, if misconduct is committed by an officer, the CPO (or designee) and Chief Legal Officer (CLO) (or designee) will determine discipline in concert with the Chief Executive Officer (CEO). If misconduct is committed by the CPO or CLO, the CEO will determine discipline in concert with the CLO or CPO, respectively. If misconduct is committed by the CEO, the CLO and CPO will consult with the Board of Directors, as appropriate, and determine the appropriate action.

In all cases, disciplinary actions authorized by the DAC or CPO (or designee) will be consistent with this policy. The company may also take additional actions to comply with applicable laws or contract obligations (e.g. disclosing misconduct to the Board of Directors or to the appropriate government authorities as required).

The company's decision whether to impose discipline does not limit or prevent law enforcement or a government from taking action against the person (e.g., the revocation of a security clearance).

Factors in Determining Discipline

In determining discipline for misconduct, the DAC considers all relevant factors, including but not limited to:

- The nature or severity of the misconduct
- The impact the misconduct has on the company
- Harm (actual or perceived) caused to a colleague, client, business partner, or other third party
- The person's seniority; more senior Booz Allen people are held to a higher standard of expected behavior
- Prior misconduct
- The person's cooperation during the investigation
- Extenuating circumstances

Types of Discipline

The company has three types of formal discipline. The company may also decide to have the person's career manager

informally counsel rather than formally discipline the person. The three types of formal discipline are:

Counseling

- Documented discipline that becomes part of the person's official personnel file

- Does **not** affect promotion, bonus, or rehire eligibility
- Does **not** impact eligibility for awards and recognition programs (i.e. monetary values-based awards; the company's Values in Practice or other high-visibility leadership and/or excellence awards or program; Booz Allen nomination to external awards)

Formal Warning

- Documented discipline that becomes part of the person's official personnel file
- Ineligible for promotion for one year from date of receipt
- Ineligible for monetary values-based awards (i.e., excludes length of service awards) for one year
- Ineligible for the company's Values in Practice or other high-visibility leadership and/or excellence awards or programs (e.g., Booz Allen Excellence Award, Fellow, or similar programs) for one year
- Ineligible for Booz Allen nomination to external awards (e.g., industry awards) for one year
- Is a relevant factor in rehire eligibility
- Bonus decrement of 15% for bonus-eligible people

Termination of Employment

- Terminated from employment at Booz Allen or any of its affiliates
- Ineligible for rehire and for future business opportunities with the company (e.g., independent consulting or vendor opportunities)

Exceptions

Any request for variations from this policy must be reviewed and approved by the CPO (or his/her designee).

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](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.