



Procurement of Products and Services Policy

SPONSORING ORGANIZATION: Finance

INTRODUCTION

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 company's reputation for integrity and comply with any applicable laws and contractual terms.

The purpose of this policy is to set forth the company's rules on procuring products and services.

SCOPE

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

POLICY

Procurements are transactions where Booz Allen people agree to purchase something of value (e.g., products, services or licenses). Procurements do not include (1) employee travel and travel related business expenses, (2) contributions, grants, sponsorships, or payments made in support of nonprofit organizations, (3) payment of taxes, other government fees (such as penalties or visa fees), litigation-related fees or settlements, or bidding system access fees, (4) employee compensation, including benefits, and (5) payments made as part of mergers & acquisitions and investment transactions.

Procurements undertaken to support our clients ("Direct Procurement," which are billed to an AB-number) or for internal Booz Allen use ("Indirect Procurement," which are billed to an AG-, AM-, AP- or AR-number).

Prohibited Procurement

In accordance with U.S Government regulations, Booz Allen prohibits the procurement (whether direct or indirect) of any telecommunications or video surveillance equipment services from the following entities or their subsidiaries or affiliates:

- Huawei Technologies
- ZTE Corporation
- Hytera Communications Corporation
- Hangzhou Hikvision Digital Technology Company
- Dahua Technology Company

This prohibition extends to the above products that are embed in a final solution.

When evaluating your procurement requirements, the following should be taken into consideration:

- Ensure they know of no conflict of interest as defined in the Code, Organizational Conflicts of Interest Policy, or Individual Conflicts of Interest Policy that is created by the procurement or by engaging with the supplier.
- Ensure that the procurement is not being undertaken in an attempt to obtain an improper business advantage for Booz Allen or anyone else, as prohibited by our Anticorruption and Anti-Bribery Policy. For example, we must never engage a supplier in an attempt to influence its owner to improperly use their position as an employee or official of a government entity or client to secure a business advantage

from that government entity or client.

- Ensure that procurements involving Free and Open-Source Software (FOSS) must follow the Free and Open-Source Software Policy.
- Ensure that the procurement is not being undertaken to permit the supplier to do anything on behalf of Booz Allen that Booz Allen itself is prohibited from doing under our policies or the Code.

ADDITIONAL COMPLIANCE REQUIREMENTS FOR PROCUREMENT STAFF OR CLIENT STAFF FOR CERTAIN PROCUREMENTS

IF YOU'RE INITIATING/ENGAGING IN...	CONSIDERATIONS...
Procurements of products or services from a supplier: <ul style="list-style-type: none"> • Based in or that will send the products or services from another country • That will send products to another country 	Procurement personnel/Booz Allen people coordinate with the ITC team to determine whether any export or import licensing is required for the procurement and address any Customs clearance requirements.
Shipment of products that will, after delivery, be deployed to employees who are citizens of another country (e.g., non-U.S. person employees in the United States) or products being shipped or transferred by Booz Allen across international borders.	Booz Allen people - Obtain export and Harmonized Tariff Schedule (HTS) classification information from the supplier and provide to the ITC team. In addition, Booz Allen standard shipping processes should be followed leveraging the Booz Allen Receptionists or Dedicated Mail Rooms where applicable
Corporate affairs-related services (including all marketing, government relations, media relations, and similar services)	Booz Allen people - Procurements of any products or services that fall into the following categories must be initiated by contacting Corporate Affairs: <ul style="list-style-type: none"> • Advertising and paid media; Brand strategy, design, creative and similar services • Communications strategy, to include employee engagement • Change management strategy or support, as it relates to changes at the companywide level, or significant institutional impact • Digital strategy, to include website or webpage development, email design, and social media • Event-related services when the company is participating in and/or sponsoring an event, to include trade shows • Marketing-related services, to include digital marketing and campaign planning and trade shows, and events • Multimedia, to include photography, video production • Public relations, media relations and similar services, to include speaking engagements and book publishing • Lobbying and other government relations services
Meeting Services	Booz Allen people looking to set up an external venue to host a meeting must follow the Meeting and Event Policy.
Facility/Utilities/Leases	All infrastructure support aligned to facilities (including but not limited to lease, parking, utilities) are procured in accordance with the Real Estate & Facilities Operations team
Lawyers and legal services	Booz Allen people who require the Procurement of legal services must be initiated by contacting a member of the Legal Department aligned with your project. If you are not aware of which Legal Department member is aligned to your project, contact outsidecounsel@bah.com .

IF YOU'RE INITIATING/ENGAGING IN. . .	CONSIDERATIONS. . .
Procurement for services from suppliers that perform audit work	<p>Procurement personnel/Booz Allen people - Audit services are typically procured by the Finance Department in coordination with the Indirect Purchasing team by following internal Finance Department practice. Any other Booz Allen people who must procure audit services must seek guidance from the chief accounting officer.</p> <p>In addition, procurements of any non-audit services, including teaming agreements, from any of the Big Four public accounting companies (identified below) by Booz Allen people inside or outside of the Finance Department must be signed off on by the Booz Allen Corporate Controller:</p> <ul style="list-style-type: none"> • Ernst & Young • Price Waterhouse Coopers • Deloitte • KPMG • Grant Thornton <p>For clarification, we are strictly prohibited from teaming with Ernst & Young, which is our independent accounting company unless approved by the chief accounting officer signs off.</p>
Insurance and insurance brokers	Booz Allen people who require the procurement of company insurance is typically procured by Insurance Risk Management in accordance with Finance Department practice. Any other Booz Allen people who must procure insurance must initiate the procurement by contacting the Insurance Risk Management team.
Real estate, office space, and designated parking	Booz Allen people (facilities) - All real estate, facilities, and parking spaces must be procured by the Facilities Department in accordance with the Risk Matrix, Signature Authority Matrix, and departmental policies and practices.
Performance bonds	Booz Allen people who require Procurements of bonds or sureties guaranteeing contract performance must be procured in accordance with requirements of the Risk Matrix.
Relocation-related services	Services related to employee relocation must be procured only as instructed by the Relocation team in accordance with the Relocation Policy and related departmental policies and practices. For further guidance on relocation services, you must contact the Booz Allen help desk.

Booz Allen maintains relationships with a pool of pre-qualified indirect suppliers that can be used for all indirect procurements of products, services or licenses that catalog or punchout procurements, such as laptops, software, headsets, office supplies, etc.

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. 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.