



## Working with Ethical Business Intermediaries

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### INTRODUCTION

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:

- 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