



# Gifts and Business Courtesies, Community Impact Activities, and Sponsorship Payments Policy

**SPONSORING ORGANIZATION:** Ethics & Compliance

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## INTRODUCTION

Booz Allen is committed to conducting business ethically and in compliance with the law. In the ordinary course of business, Booz Allen and Booz Allen people use firm resources and engage in activities to accomplish the firm's strategic goals, engage with clients and participate in the community. These activities may include giving or receiving gifts and business courtesies, engaging in corporate community impact activities, and making or accepting corporate sponsorship payments.

The purpose of this policy is to establish rules for when and how Booz Allen and Booz Allen people may give or receive gifts and business courtesies, use Booz Allen funds and other firm resources to support charitable organizations and social causes, and make or accept sponsorship payments on behalf of Booz Allen.

## Scope

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

## Policy

This policy provides definitions of gifts and business courtesies, corporate community impact activities, and corporate sponsorship payments, and the firm's general criteria, specific rules and guidance for engaging in any of these activities.

## General Criteria

Booz Allen people must apply the following **general criteria** when engaging in gifts and business courtesies, corporate community impact activities and corporate sponsorship payments, in addition to more specific rules imposed in the following sections:

1. **Identity:** Know the name, title and role of each recipient/giver.
2. **Business Purpose:** Ensure that you are engaging in the activity to advance Booz Allen strategies and objectives. If you have any questions about whether an activity meets this criteria, check with your leadership. The activity must never be used by Booz Allen or any third party to improperly seek a business advantage or to otherwise violate the law, our policies or the policies of any third party. If you are uncertain whether an activity is permitted under another party's policies, check with them.
3. **Conflicts and Appearance of Impropriety:** Ensure that the activity poses no actual or perceived conflict of interest, is proportionate to the business purpose for the activity (e.g., the frequency and size is not excessive or extravagant) and does not create the appearance of impropriety (e.g., during an active procurement) or embarrassment for Booz Allen. See the Individual Conflicts of Interest and Organizational Conflicts of Interest policies and the Code of Business Ethics and Conduct for more information on conflicts of interest.

## Gifts and Business Courtesies

**Gifts and business courtesies** are things of value that are either (a) given by Booz Allen people to individuals outside of Booz Allen who have some preexisting or potential business relationship with Booz Allen or could

otherwise directly impact Booz Allen's business in their official capacity (e.g., licensing authorities), or (b) received by Booz Allen people from third parties that have some existing or potential business relationship with Booz Allen. A thing of value is considered a gift or business courtesy regardless of how it is paid for. The value of the gift or business courtesy is the fair market value, meaning the amount that the recipient would have to otherwise pay for the gift or business courtesy in a transaction between unrelated parties.

Gifts and business courtesies include meals, travel, entertainment, nominal promotional items or anything else that has some value. Gifts and business courtesies do not include:

- Anything the giver is legally obligated to provide to the recipient (e.g., travel provided by Booz Allen to a client pursuant to a contract), is typically provided as part of the recruiting process (e.g., reimbursement of meals, lodging or transportation to a candidate), or for which the recipient pays the full fair market value (e.g., by contributing to a fair share jar or otherwise reimbursing the giver); and
- Personal gifts not reimbursed by Booz Allen, meaning things of value given or received by a Booz Allen person based on a preexisting personal relationship or otherwise completely independent of the business relationship between Booz Allen and the giver or recipient.

#### Gifts and Business Courtesies Rules

Rules for giving and receiving gifts and business courtesies vary depending on who is giving or receiving the gift.

#### *Prohibited Gifts and Business Courtesies*

The following **items are always prohibited** as gifts or business courtesies:

- Cash, checks and cryptocurrency, personal loans, gifts cards that may be spent anywhere, cash awards (including honorariums), per diems, and contributions through crowd-funding sites; and
- Items or entertainment that are illegal in the jurisdiction in which they are given, or which are widely recognized as unacceptable within a business relationship.

Booz Allen people are always **prohibited from giving gifts or business courtesies to** any of the following parties:

- Employees or officials of U.S. federal agencies classified as Senior Executive Services members (typically political appointees above the General Schedule grade 15)
- Members or employees of the U.S. Congress
- Judges, employees or other officials of any U.S. federal court
- Employees or officials of current or prospective government or commercial clients, prime contractors or alliance/strategic partners who are in a position to make or influence a decision about business for which Booz Allen is competing, or any similar business negotiations or matters. If you are unclear whether a party is in a position to make or influence a decision about current or prospective business matters, contact Legal, Ethics & Compliance.
- Employees or officials of government agencies who are in a position to influence a significant policy, regulatory or enforcement decision that will directly and specifically impact Booz Allen.

Booz Allen people are also always **prohibited from receiving gifts or business courtesies from** any of the following parties:

- Entities or individuals that are competing or otherwise negotiating to become a supplier of Booz Allen if the Booz Allen recipient is in a position to make or influence decisions related to the competition or negotiation.
- Entities or individuals that are competing or otherwise negotiating to become a supplier of the U.S. Government where Booz Allen is advising the U.S. Government on the selection or evaluation of the supplier.

#### *Additional Rules for Gifts To or From Government Officials*

A **government official** is any director, officer or employee of a national, state, or local government agency, entity, or body; a state-owned or state-controlled company or entity; a public international organization; or a political party outside the US; or any royal family member, candidate for office, or political party outside of the US.

In line with the rules applicable to U.S. Federal Government officials for gifts and business courtesies, Booz Allen people are permitted to give and receive gifts or business courtesies to a **U.S. Government official** that meet the **general criteria stated in this policy** and that are valued at USD \$20 or less per event up to a total of \$50 in a calendar year.

Booz Allen people are permitted to give and receive gifts and business courtesies to and from **non-U.S. government officials** that meet the **general criteria stated in this policy** and that are valued at USD \$150 or less as long as the recipient has received no more than three gifts in the calendar year. For gifts or business courtesies that exceed this amount or volume, visit [gifts.bah.com](https://gifts.bah.com) and your OIC for prior approval.

#### *Additional Rules for Gifts and Business Courtesies for Other Third Parties who are Not Government Officials*

Booz Allen people are permitted to give and receive gifts and business courtesies to and from all other third parties (e.g., **commercial companies, nonprofit organizations, suppliers and vendors, current or prospective clients and primes**) that meet the **general criteria stated in this policy** and that are valued at USD \$250 or less as long as the recipient has received no more than three gifts in the calendar year. For gifts or business courtesies that exceed this amount or volume, you must visit [gifts.bah.com](https://gifts.bah.com) and your OIC for prior approval.

#### *Additional Guidance*

Contact Legal, Ethics & Compliance for guidance on the following specific types of gifts and business courtesies:

- Giving reduced-price or free admissions and related meals and promotional items to non-BAH attendees of multi-person events hosted by Booz Allen, including Widely Attended Gatherings (“WAGs”)
- Giving prizes to individuals outside of Booz Allen
- Doing or benefiting from favors or similar actions that provide some value to the recipient (e.g., letters of recommendation)

For guidance on available processes to pay for gifts and business courtesies, please see the Procurement of Products and Services policy. For all gifts and business courtesies paid for or reimbursed by Booz Allen, follow guidance from the "How Do I...Guide for Using Travel and Expense Online" to allocate the correct charge code, select the correct expense type, and upload the required documents, including pre-approval where required. For guidance on activities that may be considered lobbying or other political activities, see the Political Activities and Lobbying policy. For any other questions about gifts and business courtesies, contact Legal, Ethics & Compliance.

#### **Corporate Community Impact Activities**

**Corporate community impact activities** are activities officially supported, sponsored or sanctioned by Booz Allen that promote, aid, support, or directly benefit domestic nonprofit or international nongovernmental organizations, universities and schools, certain social enterprises, and certain activities conducted for the general purpose of making a positive impact on our communities. Corporate community impact activities may also be undertaken for recruiting, engaging, and supporting Booz Allen people, generating brand awareness, achieving marketing or other bona fide and legitimate business goals.

Corporate community impact activities include:

- Paying an organization to sponsor, support, or engage with such organization for corporate community impact purposes;
- Purchasing items such as supplies, space, and food for an activity described herein, or making a financial donation to an organization described herein, and seeking corporate reimbursement;
- Generating employee awareness, interest, or participation in personal or corporate community impact activities using firm resources;

- Using the firm's logo, name, or other brand elements externally to imply corporate endorsement or partnership, or to promote that Booz Allen employees are engaged in a corporate community impact activity described herein (this includes wearing branded attire);
- Using Booz Allen's office space for community meetings or events for a corporate community impact activity; and
- Donating the firm's business services, licenses or products, intellectual property, and other firm property to an organization and for the purposes described herein.

Personal community impact activities (community impact activities that are not officially sponsored, supported or sanctioned by the firm) are not subject to this policy, but may be subject to the Individual Conflicts of Interest policy and other firm policies. If you have any questions about whether a certain community impact activity is personal or corporate, contact the Community Impact team. For more information on approval for participation and membership in trade associations or professional organizations, see the Procurement Integrity and Competing Fairly and Individual Conflicts of Interest policies or contact Legal, Ethics & Compliance.

#### Corporate Community Impact Rules

When engaging in corporate community impact activities, Booz Allen people must:

- Ensure that the recipient is a type of organization permitted to directly benefit from corporate community impact activities. For questions about permissible organizations, contact the Community Impact team.
- Obtain prior approval from Corporate Affairs by contacting the Community Impact team before dedicating employee time or firm resources. Booz Allen resources may not be used to organize and promote auctions and other games of chance for the purposes of raising funds for any organization or cause unless prior approval has been obtained.
- Use only the Contributions Portal to pay for costs associated with corporate community impact activities. Do not use credit cards (including corporate purchasing cards) for payments to nonprofit organizations or international nongovernmental organizations. Any costs associated with corporate community impact activities are unallowable unless an exception was approved in advance by Government Accounting Compliance.
- Actively take inclusiveness and accommodation into consideration when developing or executing a corporate community impact activity. Active consideration of these factors must be carried out at all phases of a corporate community impact activity and must focus on the actual activities contemplated or planned and how those activities may be perceived by others within and outside of the firm.

#### Additional Guidance

For guidance on time charging related to corporate community impact activities, such as pro bono projects, see the Time Reporting and Staff Alignment Policy. For guidance on protecting the Booz Allen brand when engaging in corporate community impact activities, see the Protecting Booz Allen's Brand policy. For other questions about corporate community impact activities, contact the Community Impact team.

#### **Corporate Sponsorship Payments**

**Corporate sponsorship payments** are payments made for the purpose of supporting a discrete event, activity, or initiative. They include Booz Allen money, resources paid for by the firm, or activities that utilize firm resources (including corporate email) provided directly to any entity that is not a 501(c)(3) public charity organization (including for-profit entities and many non-profits), and money or other resources of value received by Booz Allen from other individuals or organizations that are not gifts or business courtesies. Corporate sponsorship payments do not include money, resources paid for by the firm, or activities that utilize firm resources given by Booz Allen to other organizations (whether nonprofit or for-profit) in exchange solely for membership in an external group (e.g., a trade association or consortium).

### Corporate Sponsorship Payments Rules

When giving or receiving corporate sponsorship payments, Booz Allen people must:

- Obtain prior approval from an executive sponsor at the SVP or EVP level to make or receive corporate sponsorship payments.
- Use only Ivalua for payments to for-profit organizations and the Contributions Portal (contributions.bah.com) for payments to nonprofit organizations to give money or pay for other resources.

### Additional Guidance

For additional rules on attending or participating in meetings and events, see the Meeting and Events policy. For more information on approval for participation and membership in trade associations or professional organizations, see the Procurement Integrity and Competing Fairly and Individual Conflicts of Interest policies or contact Legal, Ethics & Compliance. For other questions about corporate sponsorship payments, contact the Community Impact team.

### **REPORTING CONCERNS**

We expect Booz Allen People to comply with our policies and promptly raise questions or concerns about our business and/or business practices. Violations of any Booz Allen Policy, including this one, will be addressed in accordance with our Discipline for Misconduct Policy.

We rely on Booz Allen people to report suspected violations of our policies and our Code of Ethics and Business Conduct. As outlined in our Mandatory Reporting and Non-Retaliation Policy, if you observe or have reasonable suspicion that a Booz Allen policy or the Code has been violated, you have a responsibility as part of your employment to promptly report your concerns by contacting any of the following firm resources:

- Your Job Leader or Career Manager
- One of the firm's Ethics Advisors
- Human Resources via the Help Desk
- Employee Relations
- The Legal Department
- The firm's Ethics & Compliance Team
- The firm's Chief Ethics and Compliance Officer
- The firm's Ethics HelpLine (at +1-800-501-8755 (US) or +1-888-475-0009 (international))
- The firm's site for anonymously reporting concerns (<http://speakup.bah.com>)

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.