



Travel to a High or Elevated Risk Country Policy

SPONSORING ORGANIZATION: Security Services

INTRODUCTION

Some business opportunities may require Booz Allen people to travel to a high or elevated risk country. Booz Allen must carefully evaluate and approve travel in these situations on a case-by-case basis.

The purpose of this policy is to outline the approval process and considerations that must be undertaken when approving travel to a high or elevated risk country.

SCOPE

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

POLICY

Work-related travel by Booz Allen people to countries identified by the firm’s Business Assurance Office (BAO) as high or elevated risk requires advance approval. Travel related to a client engagement must be approved through the firm’s Sensitive Risk Review Board, pursuant to the Risk Matrix. When the travel is not related to a client engagement, the traveler should reach out to the Business Assurance Office for approval. This policy does not apply when an employee is traveling to a Booz Allen office in a high or elevated risk country to which they are currently aligned or will be aligned as a result of the new work arrangement, or when a Booz Allen person is traveling to a high or elevated risk country for personal reasons. Travel with Booz Allen IT Assets, other than a smartphone, is considered work-related travel for purposes of this policy. Reference the Acceptable Use of IT Assets and Computing Environments Policy for more information.

What is a high or elevated risk country?

Inclusion on the firm’s high or elevated risk country list is determined by a collaboration of leadership from Information Services, Legal, Ethics & Compliance and Security Services and is based on current counterintelligence, national security, cyber and physical safety/security threats. Access the firm’s list of high or elevated risk countries [here](#).

Approval for travel to high or elevated risk countries

To gain approval to travel to a high or elevated risk country in support of a client engagement, the program manager must follow the approval process for high and elevated risk travel set forth in the Risk Matrix. If an employee is traveling to a high or elevated risk country for any other business reason (e.g., marketing assignment, training, etc.), the employee’s Job Leader must submit an approval request, including the purpose of the trip and travel logistics, to the Business Assurance Office (BAO), which will then submit the request to the Risk Review Board. Travel for non-client engagement activities must also have standard travel approvals as required by the Travel and Expense Reimbursement Policy.

If an employee is traveling to a high or elevated risk country for personal reasons, the employee may be subject to additional requirements. Please contact the Business Assurance Office for more information.

Factors such as the nature of the work, safety protocols, assignment / travel duration, lodging and working locations (including security posture), means of travel into and out of country and the mode, length, and frequency of in-country travel (including vehicle type and security arrangements), experience of traveling personnel, reliability of communications channels available for reporting back to the U.S., and other known risks will be carefully considered in each case.

When the travel is related to a client engagement, Booz Allen project team leadership must work with the client to set the scope of the travel to minimize risks to Booz Allen people and the firm. All applicable considerations related to high or elevated risk travel must be addressed as early as possible with the appropriate representatives from the Business Assurance Office, as well as the Legal Ethics & Compliance, Contracts/Subcontracts, People Services/HR, Security Services, Information Services, International Operations, and/or Risk Management/Insurance, as necessary.

Booz Allen people preparing to travel to a high or elevated risk country and their Program Managers must certify that they are undertaking such travel willingly and voluntarily by signing the risk document presented to them by the Business Assurance Office during their pretravel security briefing.

In the case of contract or task order proposals that may require travel to high or elevated risk countries, advance authorization to bid on the opportunity must be obtained pursuant to the Risk Matrix prior to submission of the proposal to the client. In addition, if Booz Allen wins the award, the program manager must follow the approval process for high and elevated risk travel set forth in the Risk Matrix.

Prior to travel to a high or elevated risk country

Booz Allen people traveling on an assignment to a high or elevated risk country must be briefed by all applicable teams, as determined by the BAO, before they depart for travel. The briefing may include the review process outlined in this policy as well as the contents of their specific request for travel, as approved under this policy. As a part of that briefing, Booz Allen people must also acknowledge that (except in the event of a life threatening situation) any changes to or deviations from the parameters of the firm's approval for a high or elevated risk travel (including permitted locations, authorized travel, acceptable modes of transportation, and approved travel timelines) requires subsequent risk assessment and advance approval in accordance with the firm's Risk Matrix.

Employees who wish to telework in a country/territory outside of their primary work location, in any capacity, must first request approval through the ESG IO International Telework Request Process. Generally, the firm does not allow telework arrangements involving cross border travel (i.e., travel across an international border regardless of the method of transportation) or change in location to your primary work location (as outline in the Work Arrangements Policy). The firm may, on a case by case basis, consider such arrangements. Telework in the new location should not begin until approval is granted.

Booz Allen people traveling to a high or elevated risk country for personal reasons may be subject to additional requirements prior to travel. Please contact the Business Assurance Office for more information.

While in a high or elevated risk country

If you have an emergency while in a high or elevated risk country contact the Crisis Response Hotline at US toll-free: 800-291-9955 or Outside US (collect): +703-319-3487. While traveling in a high or elevated risk country, all Booz Allen people must report any security concerns or incidents, and any changes to the local security posture or operational profile, to their Program Manager immediately, who in turn must notify the Business Assurance Office immediately.

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.