

CODE OF ETHICS FOR SENIOR FINANCIAL OFFICERS

All directors, officers and employees of Booz Allen Hamilton Holding Corporation, Booz Allen Hamilton Inc. and each of their respective subsidiaries (the “Company”) are required to comply with the Booz Allen Hamilton Code of Business Ethics and Conduct (Green Book) and all Company policies. In addition, the Company’s Senior Financial Officers (as defined below) are required to comply with this Code of Ethics for Senior Financial Officers (this “Code”). Each Senior Financial Officer must carefully read this Code, adhere to its provisions, and certify compliance with it in writing upon receipt and subsequently upon request by the Company.

Purpose

The purpose of this Code is to comply with Section 406 of the Sarbanes-Oxley Act of 2002 and all regulations related thereto. Specifically, this Code is intended to deter wrongdoing and to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in the periodic reports required to be filed by the Company;
- Compliance with applicable governmental laws, rules and regulations;
- Prompt internal reporting to the appropriate persons identified in this Code of any violations of this Code; and,
- Accountability for adherence to this Code.

Definition of Senior Financial Officer

For purposes of this Code, a Senior Financial Officer is the Chief Executive Officer (CEO), Chief Financial Officer, Chief Administrative Officer, Controller, or any other persons performing similar or related functions. The individuals subject to the Code are identified in Attachment A, as currently updated.

The designation of an individual as Senior Financial Officer of the Company is based on terminology unique to the Sarbanes-Oxley Act. Such designation does not connote that the individual is an officer of the Company for other purposes.

Promotion of Culture of Integrity

Each Senior Financial Officer shall act with honesty and integrity in the performance of his or her duties at the Company and promote a culture of integrity and high ethical standards within the Company particularly as they relate to financial reporting.

Without limiting the foregoing, Senior Financial Officers must ensure that:

- The employees in the Company's financial departments understand the Company's ethical expectations including its unwavering commitment to comply with all applicable laws, rules and regulations;
- The employees in the Company's financial departments are appropriately educated on such applicable laws, rules and regulations;
- The Company's financial departments are appropriately monitored for compliance with applicable laws, rules and regulations; and,
- Any detected deviations from applicable laws, rules or regulations are promptly and appropriately identified, reported and corrected.

Conflicts of Interest

Each Senior Financial Officer shall conduct the Company's business in an honest and ethical manner and avoid actual or apparent conflicts of interest between personal and business relationships. A conflict of interest occurs when a Senior Financial Officer's private interests (or those of a close family member) interfere, or appear to interfere, with the interests of the Company as a whole, including when such private interests compromise, or appear to compromise, the Senior Financial Officer's independence or objectivity related to Company decisions. A close family member includes the Senior Financial Officer's spouse/partner, parents, children, siblings, in-laws, and anyone who shares the Senior Financial Officer's home.

A comprehensive list of all situations where an actual or apparent conflict of interest could arise cannot be enumerated; however, the following are some common examples of situations that may constitute a conflict:

- A personal direct or indirect material financial interest in any transaction involving the purchase or sale by the Company of any products, materials, equipment, services or property, other than through Company-sponsored programs;
- Ownership of the equity, debt or other financial interests of a competitor, client or supplier to the Company that compromises or appears to compromise the Senior Financial Officer's loyalty to the Company. However, the Company does not consider beneficial ownership of 1% or less of the outstanding stock of a competitor, client or supplier (determined as if any options held have been exercised) that is traded on a national or international exchange as constituting a conflict;

- Participation in a joint venture, partnership or other similar business arrangement with the Company;
- Participation in a business or investment opportunity learned of through the Senior Financial Officer's use of Company property or his/her position with the Company;
- Serving as an employee, officer or director of a client, competitor or supplier of the Company;
- Ownership of a substantial financial interest in a competitor, client or supplier by a parent, spouse/partner, child or other individual with a close family relationship with the Senior Financial Officer or employment of such an individual by a competitor, client or supplier; and,
- Providing loans to, or guarantees of obligations of, Senior Financial Officers and their close family members.

Any such actual or apparent conflicts of interest shall be disclosed in writing to the General Counsel, the Disclosure Committee or the Audit Committee as promptly as possible.

Any Senior Financial Officer who has a doubt about whether a conflict of interest exists after consulting this Code, should contact the General Counsel for the Company's determination of whether it believes a conflict of interest exists. Senior Financial Officers understand that the General Counsel's client is the Company and the General Counsel cannot provide personal legal advice to a Senior Financial Officer.

Financial Disclosures

Each Senior Financial Officer is responsible for full, fair, accurate, timely and understandable disclosure in the reports and documents that the Company files with, or submits to, the Securities and Exchange Commission and in other public communications made by the Company. It is the responsibility of each Senior Financial Officer promptly to bring to the attention of the General Counsel, the Disclosure Committee or the Audit Committee any material information of which he or she may become aware that affects the disclosures made by the Company in its public filings. Accordingly, it is essential that Senior Financial Officers exercise the highest standard of care in preparing such reports and comply with the following requirements:

- Maintain accurate books and records that fully, fairly and accurately reflect the Company's financial information and reporting of transactions.
- Prepare the financial statements and other financial information included in periodic reports in accordance with accounting principles generally accepted in the United States and in a manner that fairly presents in all material respects the financial condition, results of operations and cash flows of the Company.
- Maintain disclosure controls and procedures adequate to make all material information relating to the Company known to management, in order to ensure

that information required to be disclosed by the Company in the reports it files or submits is recorded, processed, summarized and reported within the required time periods.

- Maintain internal controls and procedures for financial reporting sufficient to provide reasonable assurances that the Company's financial statements are fairly presented in accordance with accounting principles generally accepted in the United States, and comply with such internal controls and procedures.
- Prohibit the establishment or use of any undisclosed or unrecorded assets, funds or liabilities.
- Disclose material off-balance sheet transactions in compliance with applicable laws and regulations and in accordance with accounting principles generally accepted in the United States.
- Cooperate fully with the internal auditors and the independent auditors in their work and not impede their efforts in any way or conceal information from them.

Each Senior Financial Officer shall promptly notify the General Counsel, the Disclosure Committee or the Audit Committee of any information he or she may have concerning (a) significant deficiencies in the design or operation of internal controls which could adversely affect the Company's ability to record, process, summarize and report financial data or (b) any fraud, whether or not material, that involves management or other employees who have a significant role in the Company's financial reporting, disclosures or internal controls.

Compliance with Law

Each Senior Financial Officer shall comply with all applicable laws, rules and regulations of federal, state and local governments and other private and public regulatory agencies that affect the Company's business and its conduct in business matters and the Company's financial reporting.

Each Senior Financial Officer shall promptly notify the General Counsel, the Disclosure Committee or the Audit Committee of any suspected violations of laws, rules or regulations applicable to the Company or the operation of its business, by the Company or any employee or agent thereof.

Reporting Violations of this Code

In addition to the other reporting obligations set forth in this Code, each Senior Financial Officer shall notify the General Counsel, the Disclosure Committee or the Audit Committee of any information he or she may have concerning an actual or suspected violation of this Code. All reports of violations will be promptly investigated and, if

appropriate, remedied, and if legally required, reported to the proper governmental authority.

Non-Retaliation for Reporting

No Senior Financial Officer will be subject to retaliation related to a report or disclosure made in accordance with this Code or for otherwise raising a question or concern or reporting suspected misconduct relating to the Company's operations or financial reporting. In making a report or disclosure or raising a question or concern, the Senior Financial Officer must act in good faith as further defined in the Code of Business Ethics and Conduct (Green Book).

Accountability

Compliance with this Code is mandatory for all Senior Financial Officers. Violation of this Code may result in disciplinary action, up to and including employment termination.

Revisions to this Code

The Company may revise or supplement this Code when appropriate due to legal changes or changes in Company requirements or standards. Any amendments to this Code will be disclosed as required by applicable law.

Waivers

The Audit Committee shall consider any request for a waiver of any provision of this Code, and, if granted, any such waiver shall be disclosed promptly as required by law.

Acknowledgement and Certification

This will acknowledge receipt of the Company's Senior Financial Officer Code of Ethics (the "Code"). By signing below, I agree to comply with the requirements of the Code and I represent that:

- I have read the Code;
- I understand the Code's requirements; and,
- I am in full compliance with the Code (or that any matters that might be in conflict therewith have been duly reported to and approved by the Company as required by the Code).

Signature

Printed Name

Date

Senior Financial Officer Code of Ethics
Booz Allen Hamilton Holding Corporation Senior Financial Officers
Attachment A

President & Chief Executive Officer
Senior Vice President, Chief Administrative Officer
Senior Vice President, Chief Financial Officer and Treasurer
Corporate Controller
Vice President, Pricing and Compliance
Director, Core Services
Director, Financial Analytics and Strategy
Director, Global Tax and Labor Compliance
Senior Associate, Treasury
Senior Associate, Financial Reporting & Accounting Policy
Senior Associate, General Accounting