Business Continuity Policy

SPONSORING ORGANIZATION: Security Services

INTRODUCTION
Booz Allen is committed to protecting the firm against both natural and human-produced business interruption events. This includes the protection of business operations including physical and intellectual property, services, products, and assets to support the firm’s resiliency capabilities, Booz Allen has a formal Business Continuity Program to enable for the efficient and effective resumption of the firm’s business operations.

The Booz Allen Business Continuity Program Office (BCPO) is tasked with the establishment of an effective business continuity management program consisting of the development, maintenance, Testing, Training & Exercising (TT&E) and continuous improvement of viable Business Continuity (BC) plans and recovery strategies.

The firm’s business continuity program is key to the firm’s ability to recover critical business processes, dependent systems, and related technology applications. The program provides for the conformance to ISO's 22301:2019 Standard, which consists of industry-neutral best practices focusing on an organizational business continuity management system.

SCOPE
The Business Continuity Program policy applies to all employees, officers, directors, independent contractors, subsidiaries, and affiliates of the firm (referred to as “Booz Allen people”).

DEFINITIONS
- Business Continuity Management System (BCMS)
  - The holistic management process that identifies potential threats to an organization and the impacts to business operations those threats, if realized, might cause. The process provides a framework for building organizational resilience with the capability of an effective response that safeguards the interests of its key stakeholders, reputation, brand and value-creating activities. The BCMS establishes the ISO framework for ISO 22301:2019, a standard that is the foundation of the Booz Allen business continuity program. Conformance to ISO 22301:2019 is critical to the development and implementation of the best practices denoted in the standard.
- Business Continuity Plans
  - A documented collection of procedures and information that is developed, compiled, and maintained in readiness for use in an incident to enable an organization to continue to deliver its critical products and services at an acceptable predefined level.

POLICY
Booz Allen’s Business Continuity Program consists of both Business Continuity (BC) Plans and Information Services Disaster Recovery (ISDR) Plans. The BC Plan conforms to the requirements of ISO 22301:2019 and consists of industry best practices. All Business Continuity and IS Disaster Recovery plans must be developed, tested, maintained, and stored in Booz Allen’s official Corporate BC Planning System.

What is a Business Disruption Incident?
Business disruption incidents are events that disrupt normal business operations. All BC and IS DR Plans contain strategies to resume normal operations from any business disruption incident that results in a:
- Loss of Personnel
- Loss of Information Systems
- Loss of a Key Supplier
The Responsibilities of Booz Allen People

To facilitate the rapid and safe resumption of Booz Allen business operations following a disruption incident, Booz Allen people must:

- Maintain accurate contact information in Workday and review the preparedness information on the Business Continuity Program Office Internal Website
- Participate, as required, in the development, exercising, and maintenance of Business Continuity and Information Services Disaster Recovery plans that apply to their business area. Access to the BC planning tool is based on an employee’s role and assigned permissions.
- Participate, as required, in any Business Continuity Program Office sponsored activities (e.g., Business Impact Analysis (BIA), testing, training, and exercise initiatives). Access to the BC planning tool is based on an employee’s role and assigned permissions.
- Have ready access to Booz Allen issued laptop and smart device resources either at the primary work site or at an alternate work location (e.g., home, another Booz Allen facility, or an alternate recovery site.)

Booz Allen people identified as essential personnel by the Plan Owners and Business Continuity Coordinators (BCCs) are notified about their specific role by their supervisors. Personnel with a designated role in response activities are required to take their laptop computers home with them each night to support any remote (e.g., work from home, alternate Booz Allen facility) work activities in the event of a business disruption.

Booz Allen people identified by their department heads as having a role in a BC ISDR Plan, are expected to be aware of, and know how to respond to, business disruption incidents relevant to their business processes and report any significant risk issues to the BCPO or through our Crisis Response Hotline at 1-800-291-9955.

Business Continuity Plans

The BC plans contain recovery strategies and procedures for the recovery of the most critical business processes in an agreed-upon timeframe. All Booz Allen Enterprise Solution Groups (ESG) are required to have a BCP. The plans are developed, maintained, and exercised by the Plan Owners, Business Continuity Coordinators (BCCs), Business Process Owners (BPOs), and Recovery Team members in conjunction with the BCPO.

Departmental Head Responsibilities

Departmental Heads (the most senior person within the ESG Team) must:

- Identify the Booz Allen people who have a role in a Business Continuity Plan.
- Ensure that their business areas are sufficiently resourced to develop, exercise, and maintain an effective plan.
- Approve performance metrics provided by the BCPO for the business processes under their area of responsibility.

Plan Owner Responsibilities

A Plan Owner is the individual, designated by the Department Head, who is responsible for approving, exercising, and maintaining their BC or IS DR Plan.

Plan Owners must:

- Review and approve their applicable BC or IS DR Plans on an annual basis or when a plan modification occurs.
- Participate in any corporate leadership resiliency activities coordinated by the BCPO.
- Allocate resources and recovery teams necessary to support their department’s BCPs.
- Activate their BCP when disruptions to business occur or when directed by the Corporate Crisis Management Team.
**Business Continuity Coordinator Responsibilities**

A BCC, assigned by the Plan Owner is responsible for ensuring developing, exercising, maintaining, and continuously improving the BC and IS DR plans. The BCPO will provide the tools, training, methodology, and professional expertise to the BCCs.

With support from the (BCPO), BCCs are responsible for:

- Communicating with their Plan Owner on BC Planning activities and provide direction to the BCPO to define Recovery Team Members (Essential Personnel) and ensure that all phases of the BCP comply with this Booz Allen Business Continuity Policy.
- Facilitating the completion and maintenance of their team's Business Impact Analysis and BC Plans.
- Facilitating regular exercises of their BC Plans with the Recovery Teams (e.g., Plan Walkthroughs, Tabletop Exercises, and Functional Exercises for Critical Business Processes (CBPs)).
- Working closely with the BCPO to obtain the right tools, training, and methodology to facilitate the accomplishment of their continuity planning efforts.
- Being knowledgeable about the business processes for their team to ensure all CBPs and related IT Systems/Applications have been identified and that plans, strategies, and recovery procedures exist for each.
- Participating in all phases of the business continuity lifecycle as defined in the firm’s Business Continuity Operating Standard (which defines the testing, training, and exercise requirements).
- Ensuring the use of the firm’s corporate BC planning system to develop and maintain business continuity plans and related recovery strategies/procedures.
- Ensuring the effective recovery of their business processes within the established Recovery Time Objectives (RTOs) as defined by their departments Business Impact Analysis (BIA).
- Ensuring the completion of quarterly mini-reviews and major annual reviews of their BC or IS DR plan.
- Coordinating the activities for updating, testing, approval, and distribution of their business continuity or IS DR plan.
- Participating in regularly scheduled meetings conducted by the BCPO.

**Business Process Owner (BPOs) Responsibilities**

The BCPOs are identified by the BCCs and are responsible for documenting and maintaining the BC and IS DR plans per this policy. With support from the BCCs, the BPOs are responsible for:

- Identifying business process Subject Matter Experts to complete periodic reviews and updates for accuracy of their respective BIA according to an annual schedule published by the BCPO or following any exercise or actual business interruption or when any significant organizational change occurs.
- The periodic reviews of the BIA should include both the details and related tabs in the Fusion Framework System (FFS).

**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.