THE CODE

Living Our Values: The Booz Allen Hamilton Code of Business Ethics and Conduct



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MESSAGE FROM HORACIO

Our shared purpose and values form the foundation for everything else at Booz Allen—our approach to business, our service to clients and support to communities, and our interaction with each other.

This has been true for more than a century. The people of our firm understand the direct link between Booz Allen's long-standing success and our unwavering commitment to living our values each day.

That's why we made a deliberate choice to focus on behaviors and actions when we defined a purpose statement for the firm and updated the way we described our values. Our purpose is to empower people to change the world, and our values are ferocious integrity, unflinching courage, passionate service, collective ingenuity, and a champion's heart. They come alive in how we deliver to clients and run our business, including our steadfast commitment to firm policies and regulations.

This Code of Conduct, setting expectations for the respect we all should have for our colleagues and our firm, is an important guide on a variety of topics, from managing teams and fostering a healthy workplace to protecting information, keeping accurate records, and avoiding conflicts of interest. It emphasizes **what** is expected of the firm and each of us, **why** it matters, and **how** we meet those expectations. We can each take from this resource concrete ways to live our values, and in doing so, continue to demonstrate what it means to *Be Booz Allen* today and well into the future.

Hozanski

Horacio Rozanski President and Chief Executive Officer

OUR PURPOSE & VALUES

We Empower People to Change the World

FEROCIOUS INTEGRITY

Do righ

Hold yourself and each other accountable

PASSIONATE SERVICE

Embrace the mission Listen and act with empathy Make meaningful connections Build community through generosity

CHAMPION'S HEART

Crave being the best Bring joy in the pursuit Learn from failure Compete with passion

COLLECTIVE INGENUITY

Find the problem and solve it Be resourceful and creative Seek to make the biggest difference Harness the power of diversity <u>Be devoted to the team</u>

UNFLINCHING COURAGE

Speak truth to power

Maintain convictions, especially under stress

Bring bold thinking

WHAT'S YOUR STORY

These values are reflected in our stories. Share your story and show us what it means to *Be Booz Allen*.

> Send your story to purposeandvalues@bah.com or submit a post (text or video) on @BoozAllen at engage.bah.com

OUR VALUES



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We Live Our Values Every Day

Our success comes from living our values every day. Our values reflect both who we are and who we aspire to be, collectively and individually.

Being a values-based organization enables us to attract and retain top talent, provide outstanding service to our clients, and uphold our reputation for doing the right thing.

And while we comply with all applicable laws—this is true wherever we work around the world complying with the law is just the beginning. We also demand that our actions, and those of our colleagues and others we do business with, reflect our values, even when it's difficult.

Our Code represents these values in action and applies to all employees, officers, directors, contractors, consultants, and others working on our behalf.



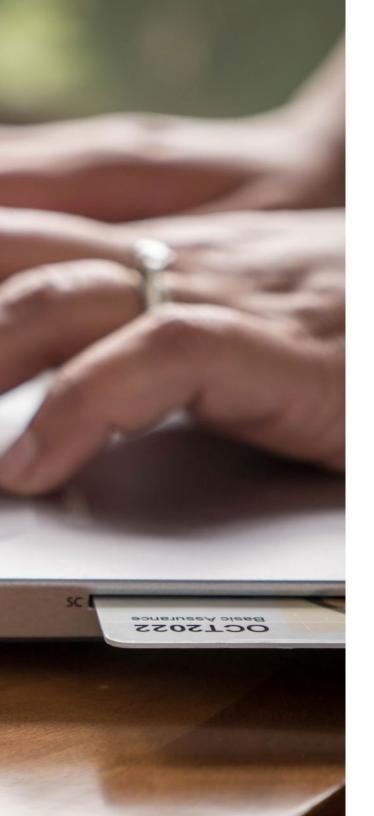


Our values should always guide our behavior to ensure we do what is right.

Each time we face an ethical challenge or dilemma where the right course of action is unclear, we must ask ourselves these questions:

- Would my actions reflect our values?
- Would I want my actions to be reported in the news?
- Would the people I care about be proud of me if they heard about my actions?
- Would I want to be on the receiving end of the decision or action?

All employees, including our directors and officers, must comply with our Code of Business Ethics and Conduct. Failure to comply with this Code, company policies, or applicable laws can result in disciplinary action, up to and including termination of employment, as well as potential civil and criminal liability.



We Raise Ethical and Legal Concerns and Have Zero Tolerance for Retaliation

As Booz Allen employees, we are empowered to do the right thing. But every possible ethical situation that might arise cannot be captured in this Code or our policies.

If we are faced with a situation where we are uncertain about what to do, we don't guess—we ask. If we see something that we think, or have a good reason to suspect, may violate the law, our Code or a firm policy, puts at risk an individual's health or safety, causes undue risk to our firm, or jeopardizes the security of sensitive firm information or a third party's sensitive or classified information entrusted to us, we have a mandatory duty to raise our concern. We have zero tolerance for retaliation against anyone who raises an ethical or legal concern in good faith, asks a question, or cooperates with an investigation. Anyone who violates our non-retaliation policy is subject to disciplinary consequences, up to or including termination of employment. If you have an ethical or legal question or concern, you should feel safe asking your question or raising your concern and confident that appropriate action will be taken. When you ask a question, you'll get an answer. When a concern is raised, the firm will promptly conduct an investigation that is confidential, impartial, and respectful. You should ask your question or raise your concern to any of these resources:

- Your career or job manager or a more senior leader
- An Ethics Advisor
- Any member of Ethics & Compliance
- The appropriate Business Partner or ESG resource, for example:
 - Your HR Talent Consultant or Employee Relations
 - The Cyber Incident Response Team (CIRT) (703-984-1933) for observed or suspected information security incidents
 - Security Services for security or safety concerns
 - Government Accounting Compliance for time reporting matters
- Any member of the Legal Department
- The Chief Ethics and Compliance Officer
- Our Ethics Helpline at 800-501-8755 (US) or international, +1-888-475-0009, or http://speakup.bah.com. Concerns may be raised anonymously.

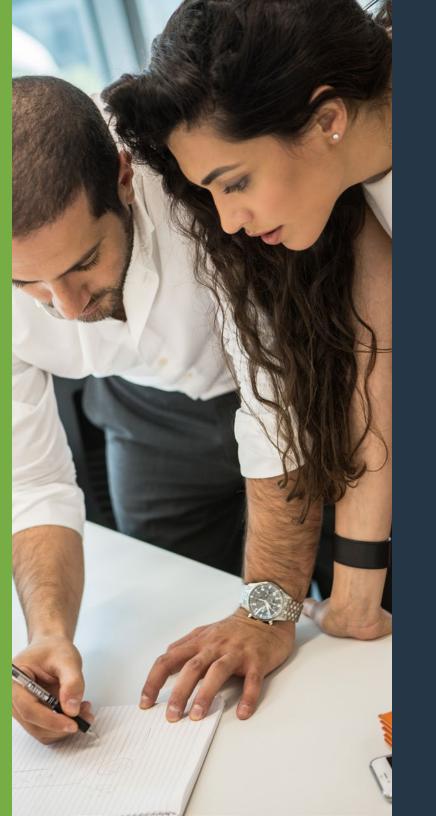
When we learn of an employee's concern, we report the matter promptly and do not attempt to investigate or resolve the matter on our own. We should not raise our concerns to someone who we think might be involved in potential misconduct, and we keep confidential any concerns raised. Anyone who raises an ethical or legal concern is treated respectfully and fairly, and we keep their identity confidential to the greatest extent possible. We treat any employee who is the subject of an investigation, or subject to discipline, respectfully and fairly.

ADDITIONAL RESOURCES

Cooperating with Investigations and Making External Disclosures Policy

Mandatory Reporting and Non-Retaliation Policy

Equal Employment Opportunity and Affirmative Action Policy



WE CARE ABOUT OUR PEOPLE

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We Embrace Diversity

WHAT

We are an inclusive organization where we value people with diverse backgrounds and experiences.

WHY

Our inclusive workplace cultivates our success because it enables us to solve complex problems, enhances our competitive advantage, and fosters employee engagement.

HOW

We hire, compensate, and promote employees based on their skills, performance, and achievements, and we are open to diverse ideas that enable all of us to contribute our best work based on our abilities.

We embrace diversity and do not discriminate or show favor based on any person's race, color, gender, national origin, religion, sexual orientation, veteran status, disability, marital status, age, gender identity and expression, genetic information, or any other legally protected category.

Booz Allen also participates in certain programs that are designed to advance the principles of equal employment opportunity in the recruitment, advancement, and compensation of qualified women, minorities, individuals with disabilities, and veterans.

ADDITIONAL RESOURCES

Equal Employment Opportunity and Affirmative Action Policy

Recruiting and Hiring Policy

Performance Management Policy

Procurement Integrity Act and Competing Fairly Policy

We Promote a Safe and Respectful Workplace

WHAT

We maintain and expect a safe and productive workplace, wherever that may be, where colleagues treat each other and those with whom they interact with respect and compassion.

WHY

We care about each other and create a work environment, wherever our people are assigned to work, that is safe and free from inappropriate conduct. This enables us to produce our best work.

HOW

We do not tolerate, and take appropriate action against, any inappropriate behavior including but not limited to discrimination, retaliation, intimidation, humiliation, bullying, harassment, violence or threatening behavior, wherever it may occur, toward colleagues, applicants, clients, or business partners.

We are committed to a workplace that is free of illegal drugs, including marijuana, and the abuse of legal drugs and alcohol.

Booz Allen's Employee Assistance Program (EAP) is available to employees and their family for questions, guidance, and to discuss specific situations around many topics, including emotional health, work concerns, or drug or alcohol problems. EAP is available by contacting LifeWorks at 888-267-2183 or visiting lifeworks.com (ID: booz-allen; password: 2520). Your personal information, as well as your family's information, is confidential and not shared with Booz Allen.

ADDITIONAL RESOURCES

Workplace and Sexual Harassment Policy Workplace Health, Safety, Security and Access Policy Use of Drugs and Alcohol Policy Discipline for Misconduct Policy

We Protect Our People's Information

WHAT

We safeguard our people's personal, medical, and financial information.

WHY

We have a legal and ethical responsibility to protect this information.

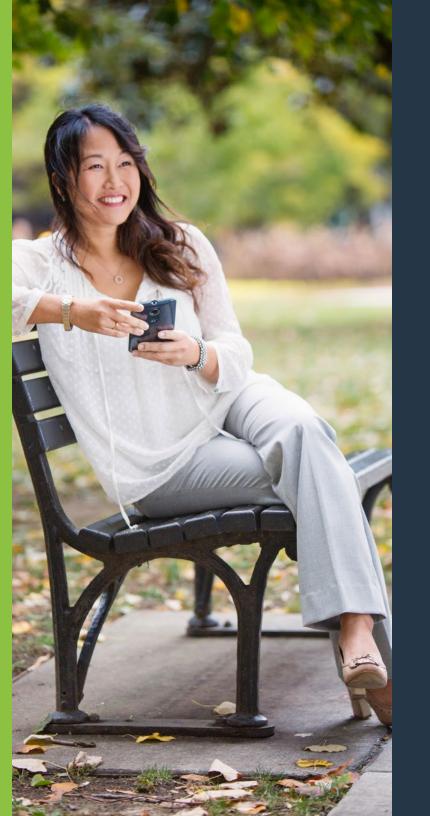
HOW

We follow all applicable laws and company policies, procedures, and controls that carefully govern how we handle our current and former employees' information. We only disclose such information for legitimate business purposes and if legally permitted or required to do so.

ADDITIONAL RESOURCES

Employment Verification Policy Privacy of PII Policy





WE CONDUCT OUR BUSINESS ETHICALLY

We Have Zero Tolerance for Corruption

WHAT

We have zero tolerance for corruption. We follow all applicable laws, Booz Allen policy, and the recipient's policies when giving or receiving gifts. We never give gifts to win work or to gain an improper advantage and never accept gifts that are meant to improperly influence us.

WHY

We conduct our business with integrity and win work only on the strength of our services and solutions. We have zero tolerance for bribery and corruption, and avoid or mitigate actual and perceived conflicts of interest or the appearance of impropriety. We require all organizations acting on our behalf to do the same.

HOW

Our policies expressly forbid bribery and include specific procedures for how and when our people may give or receive a gift or business courtesy. We also rigorously vet our business partners to ensure they share our high ethical standards and we require prompt disclosure of any potential conflict of interest.

ADDITIONAL RESOURCES

- Gifts and Business Courtesies Policy Anticorruption and Anti-Bribery Policy Working with Ethical Business Intermediaries Policy
- Preventing Money Laundering and Terrorist Financing Policy



We Compete for Business Fairly

WHAT

We compete to win only on the strength of our services and solutions. We compete for work passionately, openly, honestly, and with the utmost integrity. We provide truthful and accurate information, including any marketing and pricing data, to our clients or prospective clients. We only use, accept, or receive information that is obtained legitimately. We comply with all applicable procurement integrity rules when bidding on U.S. Government contracts. We do not enter into any agreements that would violate the law.

WHY

Competing fairly and with integrity allows us to continue our long-standing history of ensuring our clients receive the best services and solutions to meet their needs.

HOW

Our screening processes select business partners based on experience, capability, and alignment with our high ethical standards.

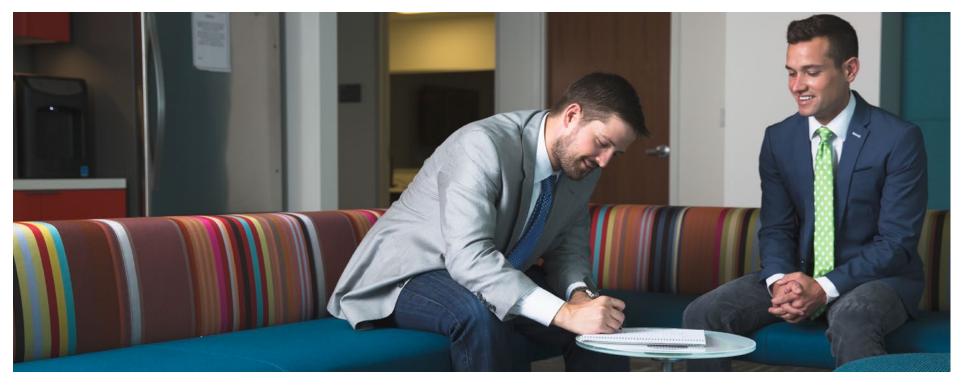
We never agree with our competitors to unfairly restrain trade. We only gather publicly available information about our competitors and do not seek non-public information through third parties.

We compete through actions conducted at arm's length to avoid any actual or apparent conflict of interest. We support fair competition among suppliers when we procure materials, supplies, and services at fair and reasonable prices consistent with quality and other requirements. We may sometimes properly receive or be granted access to proprietary, sensitive, or non-public information of the Government or another organization, for example, during performance of a Government contract or when we team with a competitor. We do not use our position or relationships to access or use information, including source selection information or third-party proprietary information, other than for the purpose for which it is provided. We maintain the confidentiality of third-party proprietary information or Government-sensitive information entrusted to us.

We never ask for or use non-public information obtained by our people in their prior employment. We report to the appropriate firm resources any attempts to obtain or use such information for unauthorized purposes, as well as the inadvertent, unauthorized access or receipt of non-public information. If we improperly receive any proprietary information, we retain such information and immediately raise our concerns.

ADDITIONAL RESOURCES

Procurement Integrity and Competing Fairly Policy Procurement of Goods and Services Policy



We Only Do Business with Ethical Organizations

WHAT

We expect all our clients and business partners, including subcontractors, suppliers, vendors, and business intermediaries, to operate in a manner that is consistent and compliant with our values and code.

WHY

We have zero tolerance for, and do not engage in, criminal activity of any kind. Knowing that our business partners are ethical organizations helps to ensure that Booz Allen does not associate with a disreputable organization or become unintentionally involved in any criminal activity.

HOW

We conduct appropriate due diligence of potential business partners, and do not engage in business activities with business partners without the appropriate approvals. We screen third parties that will act on our behalf as a business intermediary to ensure they have the same high ethical standards.

ADDITIONAL RESOURCES

Working with Ethical Business Intermediaries Policy Procurement of Goods and Services Policy Risk Matrix Policy Signature Matrix Policy



We Respect Post-Government Employment Restrictions

WHAT

We follow all applicable laws and restrictions when hiring current U.S. Government employees and staffing Booz Allen employees who were previously employed by the U.S. Government, regardless of where they would work within the firm.

WHY

As a U.S. Government contractor, we are required to comply with these laws and restrictions. In addition, doing so promotes transparency and avoids creating a conflict of interest for the firm and our people who were former U.S. Government employees.

HOW

We follow specific steps set forth in the firm's policy on hiring current U.S. Government employees and staffing employees with post-U.S. Government employment restrictions, including working closely with the firm's recruiters and resource managers who have a thorough understanding of these requirements and restrictions and who are responsible for ensuring the firm's compliance with these requirements.

ADDITIONAL RESOURCES

Post-Government Employment Policy



We Comply With International Trade Regulations

WHAT

We comply with international trade regulations that prohibit trade with certain countries, organizations, or individuals, and that require Government authorization for cross-border activities involving sensitive items or technologies.

WHY

International trade regulations protect global security and stability. These laws ensure that sensitive or potentially dangerous products or technology are not used to support terrorism or other activities that jeopardize the safety of civilian populations around the world. Our compliance with these laws is not only mandatory but critical in our role as a U.S. Government contractor.

HOW

We do not do business in countries that are subject to comprehensive sanctions programs. We screen our business partners, nonprofit grant recipients, and employee candidates against Government watchlists to ensure we do not hire or do business with the parties on those lists.

We do not engage in cross-border activities that involve regulated technologies such as defense and intelligence, information security exceeding commercially available levels, or other technologies with critical military or intelligence applications unless we have the appropriate Government authorization.

We do not cooperate with any boycott that is not U.S. Government-sanctioned, including the Arab League boycott against Israel. We do not agree to any request by a client or third party for information about our business activities related to Israel, or any attempt to require Booz Allen to refuse to do business with anyone because of any boycott against Israel. We also report these requests to the U.S. Government.

ADDITIONAL RESOURCES

Compliance with International Trade Regulations Policy



WE OPERATE OUR BUSINESS WITH INTEGRITY

We Accurately Report Time and Expenses

WHAT

We accurately record our time and only incur and charge actual and reasonable expenses for necessary business purposes.

WHY

Booz Allen is committed to conducting business with integrity and as required by law. Accurate time and expense reporting is required for us to properly account for our time and expenses, invoice our clients, and recognize revenue.

HOW

We follow our firm policy on time reporting, including accurately recording our time spent on work activities using the appropriate charge code, submitting our time reports on schedule, and verification by managers of the accuracy of reports before approving. In addition, we follow our firm policy on expense reporting, including accurately reporting and documenting our business expenses.



ADDITIONAL RESOURCES

Time Reporting Policy Travel and Expense Reimbursement Policy

We Avoid Organizational and Personal Conflicts of Interest

WHAT

We prohibit actual or perceived conflicts of interest that interfere with the interests of the firm, or that make it difficult for our people to perform their work objectively and effectively.

WHY

Booz Allen is committed to delivering objective, independent, and unbiased advice and assistance to clients.

HOW

When we find ourselves in situations that either intersect with or impact Booz Allen business or our ability to perform our job, we properly disclose this conflict to our job or career managers and cease our activities where required or appropriate, or institute mitigation measures.

We comply with all laws, regulations, and U.S. Government contracting rules regarding conflicts of interest.

Each of us monitors our business activities on behalf of the firm for situations where the firm's objectivity may be questioned or our work grants us access to sensitive U.S. Government or third-party information.

Certain client contracts require us to disclose financial or other personal interests. When required, we make these disclosures fully and accurately, and update them as required.

Personal financial holdings or holdings of immediate family members, secondary employment, outside speaking engagements, or authoring works are examples of activities that can create a personal conflict of interest, and must be disclosed to be reviewed by the firm. We may never use corporate property, information, or position for personal opportunity, personal gain, or to compete with the firm.

ADDITIONAL RESOURCES

Organizational Conflict of Interests Policy Outside Board Memberships Policy

We Maintain Accurate Records

WHAT

We maintain accurate records in the appropriate location and for the required length of time in accordance with contract terms and applicable laws. We never misrepresent, falsify, or alter data, or destroy any documents or other information that is the subject of any investigation.

WHY

Reliable business records enables us to comply with all laws and regulations, and make informed business decisions for the benefit of the company, our shareholders, and our clients.

HOW

We have policies, procedures, and controls that govern our information creation, handling, access, security, and disposition practices. We disclose complete, fair, accurate, timely, and understandable information to regulators, auditors, and the public.

A record is any recorded information, regardless of format, which is made or received as evidence of a business transaction, decision, or otherwise has value to our firm.

ADDITIONAL RESOURCES

Corporate Records Management and Legal Holds Policy

We Use Assets Responsibly

WHAT

We properly use and protect the firm's, our business partners', clients', or other third parties' assets, including information technology resources, materials, facilities, and equipment.

WHY

Access to the firm's, business partners', clients', and third parties' assets maximizes our ability to conduct business in a competitive, productive, and efficient manner. We are grateful for and respectful of these opportunities and recognize that we have a responsibility to protect these assets.

HOW

We do not use our firm's, business partners', clients', or other third parties' assets for anything other than a legitimate business purpose and in accordance with the firm's policies and any applicable contract.

We never allow unauthorized parties, including family members, to access our firm's, business partners', or clients' assets. We understand that we have no expectation of privacy when using the firm's, business partners', or clients' assets.

ADDITIONAL RESOURCES

IT Acceptable Use and Computing Environments Policy

We Protect Booz Allen, Client, and Third-Party Information

WHAT

We protect all information entrusted to us whether it belongs to Booz Allen, a business partner, a client, or other third party.

WHY

Information is a valuable asset and we must be vigilant in protecting it, whether it is Booz Allen information or the information of a business partner, client, or other third party. Because of its importance to the overall success of our business, all information owned by or entrusted to Booz Allen must be handled with due care.

HOW

We exercise great care and follow robust firm procedures when we create, handle, access, use, secure, and dispose of information, including the firm's intellectual property and capital, our business partners' and clients' information, including U.S. Government classified information, and other information entrusted to us from third parties. We follow all information security rules when utilizing any computer-enabled device or when we communicate with others inside or outside of Booz Allen.

We require Booz Allen employees who separate from the company to return any information in their possession, and the obligation to protect all information entrusted to the employee during their employment continues after the employee departs.

ADDITIONAL RESOURCES

Information Security Policy IT Acceptable Use and Computing Environments Policy

We Protect Booz Allen's Image and Reputation

WHAT

We protect our image and reputation from damage so that we can preserve the trust of our people, our clients, our goodwill, and the overall success of the firm.

WHY

For more than 100 years, the firm has built a reputation as a well-respected and trusted advisor to our clients. We are proud of this reputation our image is what our clients, business partners, and the world perceive us to be. It represents who we are and our belief that we can empower people to change the world.

HOW

We all represent a single Booz Allen brand, and we follow the firm's policies when using our brand.

We seek the proper approvals for any use of the firm's name or image including use by a third party, at a tradeshow or event, public speaking engagements, media interviews, or authoring any works such as a book or an article.

Our public communications are accurate and preserve confidentiality commitments to our clients, employees, and third parties.

We are thoughtful when engaging on social media and understand that our personal and professional images are linked. We follow our company policies and guidelines on sharing information and setting up social media accounts representing or referring to Booz Allen.

We recognize and are accountable for our personal and professional conduct, at and outside of work, which could materially impact Booz Allen's image and reputation.

ADDITIONAL RESOURCES

External Communications Policy Brand Policy Using Social Media

We Do Not Engage in Insider Trading

WHAT

We do not, directly or indirectly, purchase or sell securities of the firm or its affiliates, or any other company, while in possession of material nonpublic information concerning the firm or any other company.

WHY

Complying with the laws and regulations regarding the trading of securities promotes a fair and open market for not only our people and our shareholders, but for market participants as a whole. Our compliance with these laws is not only mandatory, but critical in our role as a publicly traded company.

HOW

We do not disclose non-public firm, business partner, client, or any third-party information in our possession to anyone outside the firm, including family or friends, in a social setting, a public place, or on social media.

We provide all current and prospective investors with equal access to material information concerning our business and financial performance. We do not trade securities during periods when trading is restricted.

All contact with investors and analysts is handled by our Investor Relations group. We do not respond to individual inquiries from the investment community unless specifically asked to do so by an authorized individual in the Investor Relations group.

ADDITIONAL RESOURCES

Insider Trading Policy

We Cooperate with Investigations

WHAT

We cooperate fully with Government and internal investigations and other Government oversight related to our business.

WHY

Transparency and cooperation are key to our success in maintaining our reputation as a highly ethical organization.

HOW

We provide complete, honest, and thorough information related to an investigation, audit, or review, even if doing so means revealing violations of policy by ourselves or others. We preserve all documents, data, and other materials related to any matter that is subject to government or internal investigation, audit, or review.

Government oversight can include audits, floor checks, and investigations and involve techniques to obtain information including subpoenas, search warrants, interviews, and informal requests for information. When responding to these Government requests, we are cooperative, truthful, and as accurate as possible.

If we are contacted by a representative of the Government or a third-party investigator or asked to provide any property, documents, or information external to the firm, we promptly contact the Legal Department.

ADDITIONAL RESOURCES

Cooperating with Investigations and Making External Disclosures Policy



WE VALUE OUR Role as a good Corporate citizen

We Are Committed to Environmental Sustainability

WHAT

We endeavor to reduce our impact on the environment through conservation efforts related to our energy consumption, greenhouse gas emissions, water use, and waste generation.

WHY

We have a responsibility as a corporate citizen to make a positive impact in building a more sustainable society.

HOW

We operate in a manner that incorporates leading practices such as pollution prevention techniques, efficient use of resources, and minimizing waste generation, in addition to complying with all applicable environmental laws and regulations. We develop innovative and sustainable solutions for our clients to help address global challenges while promoting responsible consumption of resources in operating our business.

ADDITIONAL RESOURCES

Sustainability Program Management Office



We Are Committed to Human Rights

WHAT

We honor and celebrate human rights. We condemn human trafficking or slavery, forced labor, or child labor, and do not engage in these activities within the firm or throughout our supply chain.

WHY

Human rights are the most fundamental rights that we have and are at the heart of our Purpose and Values. We join the global community in promoting and protecting human rights and working to stop actions that infringe on these rights, consistent with our support of the principles and values contained in the United Nations Guiding Principles on Business and Human Rights.

HOW

Our robust global policies, procedures, programs, and practices reflect our strong commitment to human rights, corporate citizenship, and fair labor conditions.

We demonstrate this through our dedication to integrity in our supply chain, zero tolerance for corruption and other financial crimes, competing fairly for business and protecting the privacy of data, compliant human research, and sustainable procurement with no use of conflict minerals, among many other practices. We screen third parties to ensure that violations of human rights and criminal activity are not occurring in our supply chain.

We are deeply committed to fair and supportive treatment of our people. We respect our employees' rights to agree to terms and conditions of employment voluntarily without coercion, and to freely terminate their employment on appropriate notice. We ensure that our employees are of legal working age for their position and have a safe, healthy, and respectful workplace with zero tolerance for retaliation. We are committed to diversity and inclusion and to the availability of benefits, health coverage, and natural disaster relief for our people.

In addition to the resources provided in the Code, employees may report any suspected trafficking activity to the Global Human Trafficking Hotline at 1-844-888-FREE or **help@befree.org**.

ADDITIONAL RESOURCES

For more information on Booz Allen's policies, processes, programs, and practices in support of our commitment to Human Rights, click here.

We Respect the Political Process

WHAT

We respect the political process and our employees' rights to participate in it, and we may engage in lobbying on behalf of the firm when appropriate.

WHY

We support an active and fair political process that provides an opportunity for everyone to have a voice.

HOW

We comply with campaign finance and election laws. Our policies explain how to identify any conflicts of interest, including those that may arise as part of participating in the political process, and when and how to disclose the conflict.

We belong to various associations and groups that may engage in lobbying activities, but any direct engagement in their lobbying activities must be approved by the Legal Department.

Employees may engage in political activities during their personal time using their own resources, but are not permitted to use the firm's name or resources for political purposes.

We do not lobby on behalf of clients because the law prohibits U. S. Government agencies from contracting for lobbying services. This ban includes testifying on behalf of a U.S. Government agency, drafting testimony for its officials to deliver, responding to questions or correspondence from U.S. Congress, or drafting agency responses to U.S. Government audits.

ADDITIONAL RESOURCES

Political Activities and Lobbying Policy Secondary Employment Policy

We Engage in Our Communities for Social Good

WHAT

We contribute to the communities where we live and work and empower ourselves to change the world.

WHY

Booz Allen cares about our people and the people of our communities. Helping communities through the generosity of our business and employees demonstrates this commitment.

HOW

We encourage all employees to be actively involved in the community through volunteerism. We do so by working through established groups within our firm, participating in sponsored activities, and encouraging contributions to charitable, educational, and civic organizations.

ADDITIONAL RESOURCES

Time Reporting Policy Booz Allen Cares



Waiver of the Code or Policy

The Code represents our values in action and applies to all employees, officers, directors, contractors, consultants, and others working on our behalf. Any waiver of the Code for directors or officers (which is only necessary in rare instances) must be approved by the Board of Directors only or its duly authorized committee and shall be disclosed promptly to the firm's shareholders.