

QINETIQ

Supplier Code of Conduct

2023



Dear Valued Supplier,

At QinetiQ, we believe that following our values of integrity, collaboration and performance enables us to deliver excellence to our customers and maintain the trust of all of those we work with.

It is important to us to uphold high ethical and responsible standards and we expect this from end-to-end delivery, including throughout our supply chain.

Working with you, our supplier, we want to build long-lasting relationships on a strong level of trust. You are an extension of our business.

The QinetiQ Group Supplier Code of Conduct (the “Supplier Code”) sets out the main principles and standards that we expect from our suppliers, reflecting the standards that all employees and directors hold from our own Code of Conduct.

This is not intended to conflict with or modify any existing contractual terms between QinetiQ and our suppliers. We intend to offer guidance for QinetiQ’s suppliers and, should conflict arise, any existing contractual terms and conditions will take precedence. We welcome our supplier’s contributions towards this code.

The core principles we expect are:

- Abiding by all relevant laws and regulations
- Providing a safe, diverse and inclusive workplace and a respect for human rights
- Committing to sustainability to protect our environment
- Supporting us in achieving our net zero targets by 2050 or sooner

You are integral to QinetiQ’s success, so we require that you respect and fully adhere to this Code, working with your suppliers to flow down, contributing towards the delivery and implementation of these expectations.

Thank you,

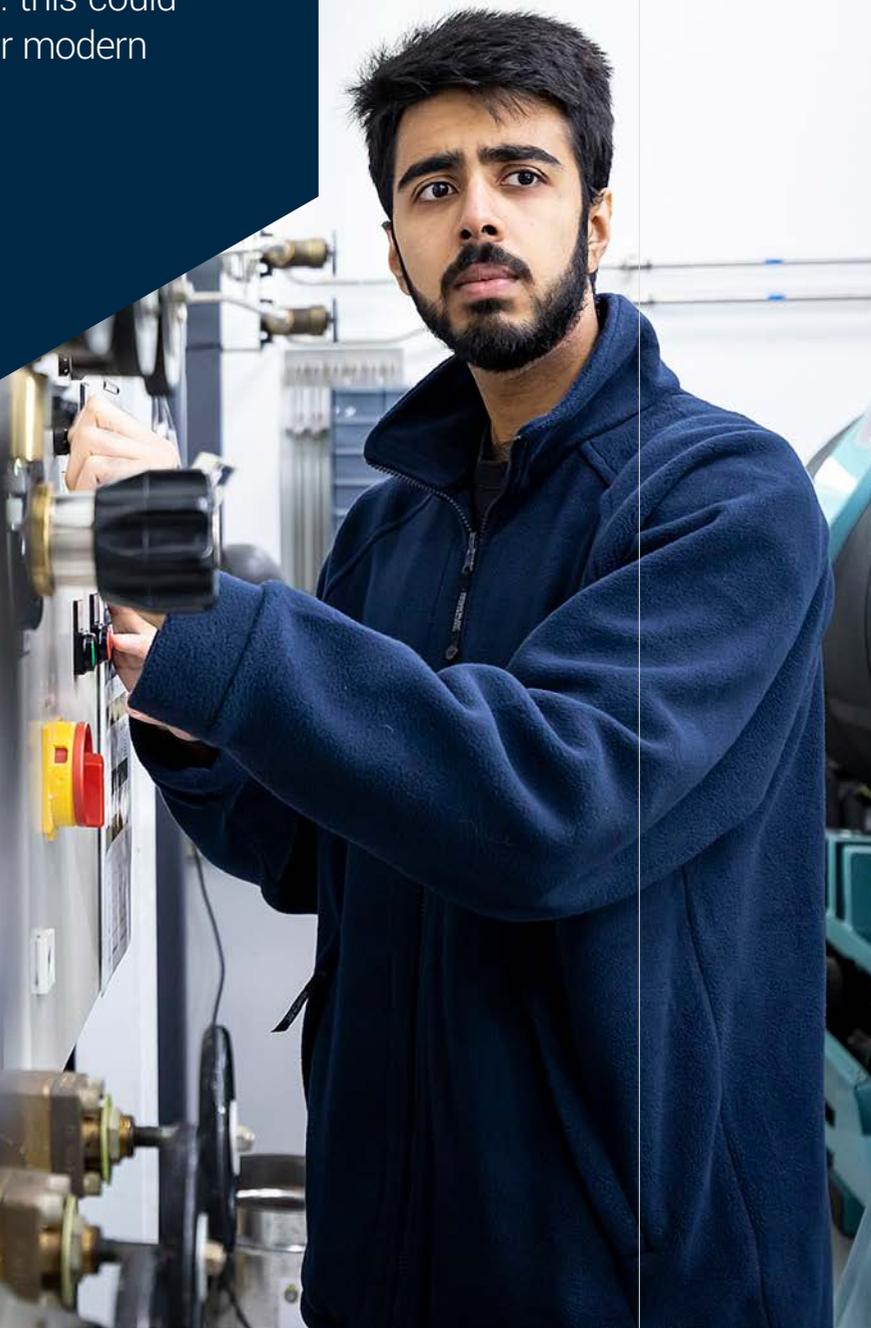


Sam Lewis
Chief Growth Officer

Speak up

It is important to QinetiQ that all employees and partners speak up if they identify a concern: this could be about safety, bribery or modern slavery for example.

We strongly support a culture of speaking up without fear of retaliation against those who report or raise a concern.



We have a number of routes available including our “confidential report” service, which operates 24/7 and our ethics email helpline. We would like to ensure that all in our supply chain feel confident that our approach to “speak up” includes them and encourage our suppliers to provide a similar anonymous service for raising ethical concerns.

For our ethics email please use: **ethics@QinetiQ.com**

To use the externally provided confidential reporting system, visit: **<http://QinetiQ.ethicspoint.com/>**

Or you can make contact by phone:

 Australia 1800 986 239	 Germany 0800 1890364
 Canada (844) 932 1013	 Sweden 020 10 93 34
 France 0805 08 09 86	 UK 0800 069 8738

 For suppliers to our US business, please use the following details:

Ethics email: **ethics@us.QinetiQ.com**

Externally provided confidential reporting system
<https://QinetiQinc.ethicspoint.com>

Toll free number, accessible anytime from within and outside the USA

1-888-400-4511

Governance

Laws and Regulations

Core Principle: Abiding by all relevant laws and regulations.

We expect our suppliers to know and comply with all laws and regulations, national and international; relevant to their business.

This principle covers those laws relating to labour, environmental laws, sourcing and trading of minerals from any conflict-affected and high risk areas, as well as all regulations and standards set out by governing bodies.

Anti-bribery and Corruption

We do not tolerate bribery or corruption in any form. We expect our suppliers to operate a zero tolerance approach to this too, ensuring that they do not: offer, promise, give, accept or receive any bribes or any other form of inducement (gifts, payment, hospitality or entertainment).

This is regardless of value, with the intention or appearance of influencing a business decision or securing an improper business advantage, whether directly or through a third party.

This does include facilitation payments, even where such payments are considered to be part of local business practice or acceptable under local law.

Conflict of Interest

QinetiQ suppliers should avoid any relationship, influence or activity that might impair their ability to make fair and objective decisions when performing their job.

If a supplier believes there is, or may be, an actual, potential or perceived conflict of interest, we expect them to disclose it to QinetiQ and all other affected parties, as soon as possible. We also expect suppliers to provide adequate training to employees who may be exposed to the risk of conflict of interest.

Information Security

It's vital to QinetiQ that its suppliers ensure that all sensitive data and information (including the assets and equipment on which it is processed and stored) is appropriately protected. We expect data and information to be correctly and clearly marked, and systems managing this to have appropriate protection. Access to classified information should be restricted to individuals with relevant formal security clearances and on a 'need to know' basis. Failing to protect sensitive and classified information is against the law and could significantly damage both the supplier's and QinetiQ's reputation. In cases of national security, if laws are broken, the individuals involved can also face substantial fines and imprisonment.

Conflict/Responsible Minerals

Suppliers should establish policies and processes to reasonably assure themselves that any minerals in this **category** which may be contained in the products they manufacture do not directly or indirectly finance or fuel human rights abuses.



Suppliers should exercise, where required by law, due diligence on the source and chain of supply of these minerals, and at a minimum require the same from their next tier suppliers.

Counterfeit Parts

Suppliers are expected to develop, implement and maintain effective methods and processes to minimise the risk of introducing counterfeit materials or components into our supply chain. In addition, suppliers shall provide notification to recipients of counterfeit parts and materials when required, and exclude them from the delivered product.

Protection of Personal Data

QinetiQ takes data protection extremely seriously and we intend to work with suppliers who feel the same about data. QinetiQ operates across many jurisdictions and applies the principles of the UK Data Protection Act 2018 across all our entities, irrespective of location. Our privacy notice is located [here](#).

We expect our suppliers to understand how to effectively and compliantly manage our data, including holding our data securely, and only sharing our data where permission has been provided to do so. Specific arrangements will be described in the contract through a data protection clause or more prescriptive agreements, which must be applied. Due to the nature of our business, there is a requirement to notify us if there are any changes to a supplier's business such as changes in ownership or acquisitions, or if there has been an issue with processing our data by the supplier, or a sub/processor, and if this is on another contract out of courtesy.

Trade Compliance

It's essential that suppliers comply with all applicable import and export control laws and regulations including embargoes, sanctions, and anti-boycott rules. QinetiQ expect suppliers to provide information particular to their goods relating to customs and strategic exports licensing.



Suppliers must understand any sanctions, import and export control requirements relating to their work and ensure decisions and activities comply with those requirements.

People

Core Principle: providing a safe, diverse and inclusive workplace and a respect for human rights.

Health and Safety

QinetiQ is committed to safety first culture, and protecting our people and partners is a priority.

We expect our suppliers to follow suit and to provide a safe, healthy and secure working environment for their employees, contractors, customers and anyone who may be affected by their activities. However, we recognise that the success of our business goes beyond simply following the legal requirements.

To deliver our safety culture in QinetiQ, we have our 'Safe for Life' programme. Safe for Life focuses on our behaviours and safety culture, not just systems and process, so the principles can be applied to whatever we are doing, wherever we are. We all share responsibility for complying with relevant health and safety laws and regulations, so expect all suppliers to take an active role in ensuring this.



Diversity and Inclusion

We value a diverse workforce and supply chain. Our inclusive culture enables our people, suppliers, customers and partners to operate at their best.

In line with QinetiQ's values, suppliers are expected to:

- Support and promote diversity and inclusion, in the workplace and with suppliers
- Provide an environment free from all forms of harassment, bullying and discrimination
- Work in partnership to create and sustain an inclusive working environment where everyone's innovation and unique contribution is valued
- Provide equal opportunities and treatment of employees and suppliers through non-discrimination on the grounds of protected characteristics – race, disability, age, sex, sexual orientation or religious beliefs
- Encourage engagement with Size, Ownership and Geographically diverse Suppliers – e.g. Small to Medium Sized Enterprises (SMEs). Where appropriate, encourage commitment to the National Armed Forces or similar
- Provide all employees with a written contract in a language they understand, clearly indicating their rights and responsibilities, wages, working hours, benefits and other working/ employment conditions



Human Rights

The responsibility to respect human rights is a global standard of expected conduct for all business enterprises wherever they operate.

In line with QinetiQ's values, we expect:

- **Dignity and Respect:** for all employees, suppliers and partners
- **No Modern Slavery, Child Labour and Human Trafficking:** our suppliers will implement measures to ensure these are not taking place in their supply chains, or in any part of their business, ensuring all laws, regulations and acts (e.g. including Modern Slavery Act and Uyghur Forced Labour Prevention Act but not limited to) are adhered to
- **Freedom of Association:** recognise and respect the rights of employees to exercise lawful rights of free association, and to communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal
- **Employment Environments:** free from physical, psychological, and verbal harassment, or other abusive conduct
- **Freedom of movement:** and the ability to terminate employment, prohibiting the confiscation of workers identification documents
- **Fair wages:** for all employees, with working hours and overtime observed
- **Training:** provided for employees regarding the risks of modern slavery in their supply chains
- **Grievance mechanisms:** in place to ensure that any concerns raised by employees, suppliers or partners can be reported and addressed. If no grievance mechanism is in place, suppliers should use the QinetiQ Speak Up reporting details provided above.

Prompt Payment Practices



We have made a commitment to prompt payment with our suppliers. We expect our suppliers ensure they are also paying their suppliers on time in accordance with agreed contractual payment terms.

We encourage them to adopt and sign up to a relevant national payment code to demonstrate this commitment.

Community Engagement

We encourage our suppliers to engage with the communities in which they operate, to identify social value and support economic development, and to further contribute towards sustainability and deliver positive social impact.

Real Living Wage

At QinetiQ, we have demonstrated our commitment to fair pay through our decision to seek Living Wage accreditation. This will ensure that every direct employee within our business receives the real living wage at minimum, incorporating a yearly uplift to reflect the cost of living at that time.

We expect our suppliers to uphold the same standards, over the next 3 years we will work to imbed these principles within contracts for contractors and subcontractors that regularly work on QinetiQ sites; ensuring fair pay within our supply chain.

Planet

Core Principle: Committing to sustainability to protect our environment.

To protect our planet we all need to work together.



We recognise that we have an impact on the planet through our greenhouse gas emissions, the resources we use and the waste we produce.

All of us are responsible for the sustainability of our environment, so we expect everyone working at QinetiQ and our suppliers to behave in a way that pro-actively addresses and reduces our impacts on biodiversity, and seeks opportunities to improve the natural environment.

We welcome and encourage initiatives from suppliers that help us to minimise our environmental impacts.

Sustainable Procurement

Sustainable Procurement, also referred to as responsible or ethical procurement, addresses the wider impacts of an organisation's activities on the '5Ps' – People, Planet, Peace, Prosperity and Partnership.

QinetiQ and our supply chains need to work collaboratively, integrating purpose and corporate accountability to deliver and embed Environmental, Social Governance (ESG) principles into our procurement process.

We expect our suppliers to have a written Environmental Social Governance (ESG) or Sustainability Policy and that all employees are informed of and have knowledge of that document.

Net Zero Commitment

Core Principle: Supporting us in achieving our net zero targets by 2050 or sooner.

We were the first Aerospace and Defence Company to have our Science Based Targets approved in 2022.

We have committed to achieving net zero by 2050 or sooner.

Without you, our supplier, we cannot do this. As such, we encourage all of our suppliers, including SMEs, to commit to science based targets and reducing their emissions to net zero by 2050 or sooner too.



By focusing on this commitment, we can all work together towards the UK Government's Net Zero Strategy – limiting global warming to 1.5°C above pre-industrial levels.

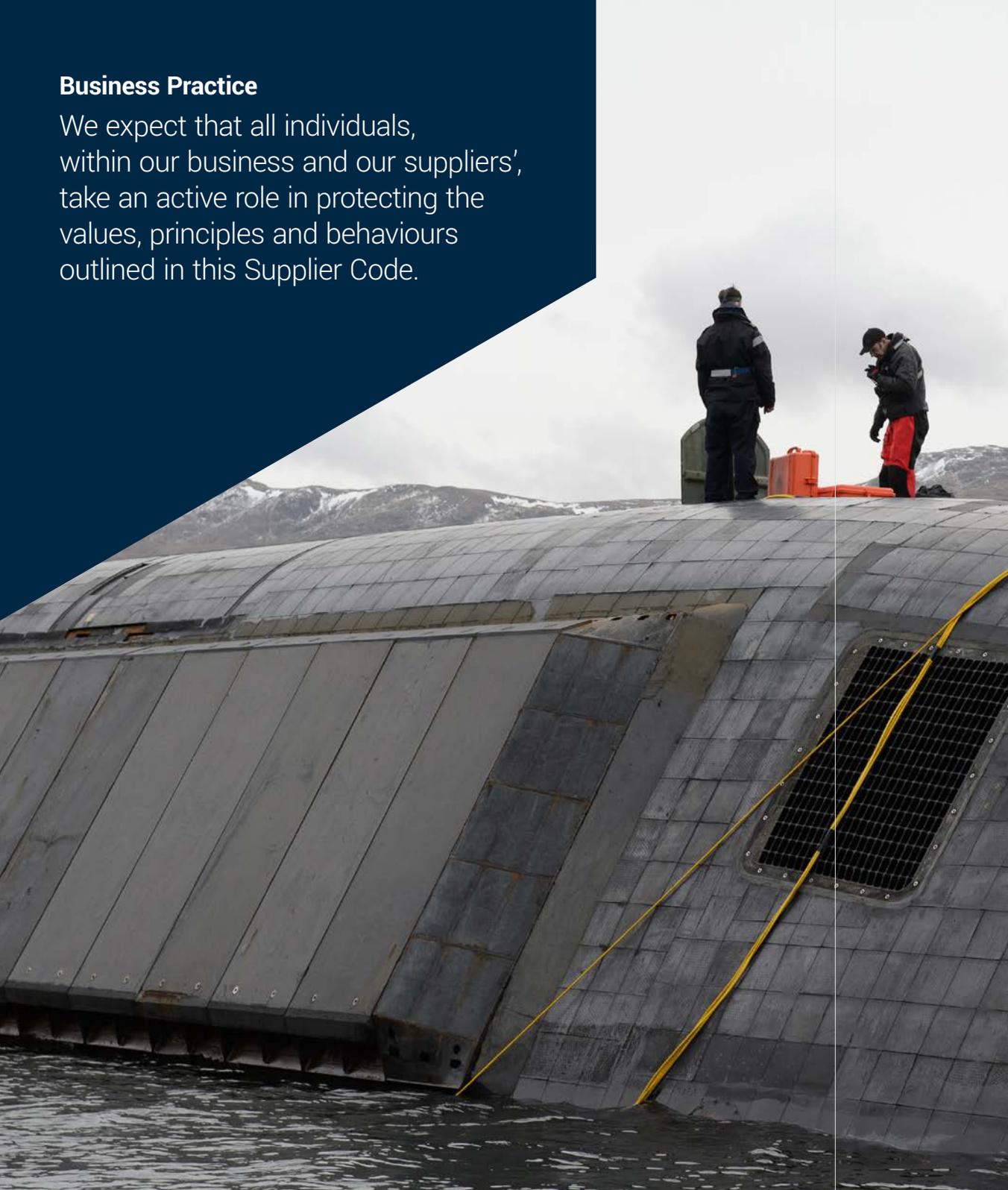
Aside from being the right thing to do, helping us move towards a more sustainable future is key to our mutual prosperity. There is increasing customer focus on emissions levels and traceability in sourcing products and services, with future opportunities favouring solutions with the lowest emissions, supported by evidence of sustainable practices across the value chain.

As well as reducing emissions, we all have a responsibility to manage our operations so that we limit waste to landfill (using the hierarchy of waste), prevent pollution and use resources sustainably. By collaborating and focussing together on these crucial elements, we will ensure the future of our businesses, communities, people, and our planet.

We need resilient natural ecosystems to be able to withstand the worst effects of climate change and improving biodiversity is fundamental to overall planetary health.

Business Practice

We expect that all individuals, within our business and our suppliers, take an active role in protecting the values, principles and behaviours outlined in this Supplier Code.



This code is designed to provide information to clarify the expectations we have of our suppliers, partners and global supply chain, setting out the minimum standards of behaviour and the practices.

Adhering to this helps ensure good business practice, benefiting both our suppliers and customers.



We also expect that suppliers flow down these principles to their own suppliers in order to ensure alignment across the supply chain.

It is essential that our suppliers securely and accurately capture, store and retain business records when needed.

If a supplier is found to not meet the expectations laid out in this Code, we will review the relationship they have with QinetiQ. Corrective action may have to be taken, subject to terms of any existing contracts.

If you have any feedback, comments or queries about this Supplier Code of Conduct, please contact procurement@QinetiQ.com

QINETIQ

QinetiQ

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