

QINETIQ

# Supplier Code of Conduct

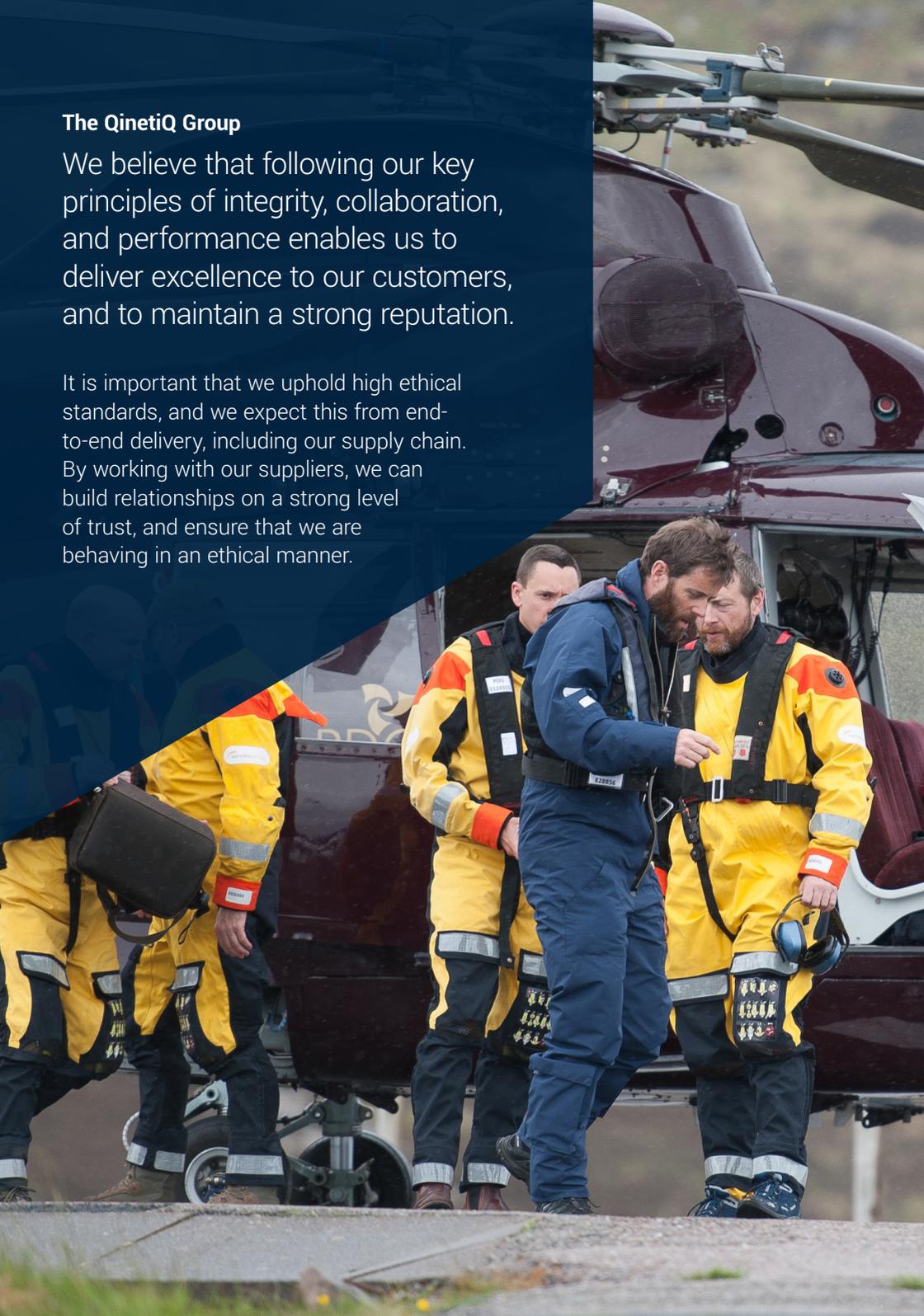
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## The QinetiQ Group

We believe that following our key principles of integrity, collaboration, and performance enables us to deliver excellence to our customers, and to maintain a strong reputation.

It is important that we uphold high ethical standards, and we expect this from end-to-end delivery, including our supply chain. By working with our suppliers, we can build relationships on a strong level of trust, and ensure that we are behaving in an ethical manner.



## Main Principles

The QinetiQ Group Supplier Code of Conduct (the “Supplier Code”) sets out the standards that we expect from our suppliers, and reflects the standards we set for our own employees and directors. Our suppliers are integral to QinetiQ’s business, and so it is essential that such suppliers adhere to the Supplier Code and work with their own suppliers to flow down these expectations.

The Supplier Code is not intended to conflict with or modify any existing terms and contracts between QinetiQ and its suppliers. It is intended to offer guidance for QinetiQ’s suppliers and, should a conflict arise, any existing contractual terms will take precedence.

### Laws and Regulations

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The Supplier Code starts from the principle that we all have a basic responsibility to abide by the law, meaning that we expect our suppliers to know the laws and regulations that apply to their business, and to perform all duties in compliance with these laws and regulations.

### Health and Safety

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QinetiQ is committed to a safety first culture, and protecting our people and those we work with 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 support us in developing our safety culture, we have introduced ‘Safe for Life’ into our business and our Supply Chain. 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.

## Anti-bribery and Corruption

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We expect our suppliers to operate a zero tolerance approach to bribery and corruption; ensuring they do not offer, promise, give or receive bribes or any other form of inducement (including cash, gifts, hospitality and entertainment), 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 includes facilitation payments, even where such payments are considered to be part of local business practice or acceptable under local law.

## Human Rights

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Suppliers are expected to treat people with dignity and respect, and to promote and maintain an ethical and inclusive culture in the workplace.

We expect our suppliers to adhere to all laws and regulations prohibiting human trafficking and forced or indentured labour, such as the Modern Slavery Act 2015, and to ensure that no child labour is used in the performance of work.

Suppliers must also have implemented measures to ensure that modern slavery, child labour and human trafficking are not taking place in their supply chains, or in any part of their business.

## Cyber Security

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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.

## International Trade Compliance

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Suppliers must comply with all applicable import and export control laws and regulations including embargoes, sanctions, and anti-boycott rules. Suppliers are expected to understand any sanctions, import and export control requirements relating to their work, and ensure decisions and activities comply with those requirements.

## Environment and Sustainability

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Like any organisation, we have an impact on our environment through the resources we use (such as energy) and the waste we produce. We expect our suppliers to comply with any environmental laws, standards and regulations that apply to them.

We all have a duty to consider the sustainability of our environment and the resources we use, so we expect ourselves and our suppliers to behave in a way that actively manages that impact, and to continuously improve efforts to do this.

## Conflict Minerals

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We expect our suppliers to comply with all relevant laws and regulations regarding the sourcing and trading of minerals from conflict-affected and high-risk areas such as gold, tin, tantalum and tungsten. Suppliers should establish policies and processes to reasonably assure themselves that any of the above minerals which may be contained in the products they manufacture do not directly or indirectly finance or benefit armed groups that are perpetrators of 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

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

## Conflicts of Interest

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Our 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, a conflict of interest, we expect them to disclose it to QinetiQ and all other affected parties, as soon as possible.

## Business Practice

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It is essential that our suppliers securely and accurately capture, store and retain business records when needed. In addition, alongside agreed contractual payment terms, we expect our suppliers to pay their suppliers in a timely manner.

## Employment Practice

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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. Suppliers must ensure that there is a system for their employees to raise any issues or concerns regarding legal and ethical issues. We expect that suppliers' employees are free to raise concerns without fear of retaliation.

This Supplier Code of Conduct is designed to provide information to clarify the expectation we have of our suppliers.

It's an enabler of business and ensures good business practice from end-to-end delivery, benefiting both our suppliers and customers. We also expect that suppliers flow down these principles to their own supply chain. If a supplier is found not to have the expectations laid out in this code, its relationship with QinetiQ will be reviewed and corrective action may be taken, subject to the terms of any existing contracts.

QinetiQ reserves the right to revise and update this Supplier Code of Conduct, if reasonable notice is given.

**If you have any feedback, comments or queries about this Code of Conduct, please contact [procurement@QinetiQ.com](mailto:procurement@QinetiQ.com)**

# QINETIQ

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