

QINETIQ

Supplier Code of Conduct

2026



At QinetiQ, suppliers are considered an extension of our business. It is therefore important to us to uphold high ethical and responsible standards, and we expect this from end-to-end delivery, including throughout our supply chain.

This Supplier Code of Conduct (the “Supplier Code”), represents QinetiQ operating in the UK, Australia, Canada and Germany.



It sets out the key expectations that we require from our suppliers, reflecting the standards that all employees hold from our own Code of Conduct.



Key Expectations

Compliance with Laws

Suppliers shall comply with all laws and regulations applicable to their business activities, including the local laws and regulations of all countries in which they operate or services are provided.

Ethics and Integrity

Suppliers are required to conduct business with integrity in an ethical manner.

Speak up


It is important to QinetiQ that all employees, suppliers and partners speak up if they identify a concern without fear of retaliation: this could be about safety, bribery or modern slavery for example.

For QinetiQ's ethics email please use our externally provided 24/7 confidential reporting system, visit: <http://QinetiQ.ethicspoint.com/>

Or call FREE from a landline:

 **Australia**
dial 1800 986 239

 **Germany**
dial 0800 189 0364

 **Canada**
dial 1-844-932-1013

 **UK**
dial 0800 069 8738



Suppliers shall provide access to a confidential reporting mechanism for employees and third parties to report workplace concerns and grievances.

Anti-bribery and Corruption

QinetiQ does not tolerate bribery, corruption, fraudulent activity or extortion in any form across its operations or supply chain. Suppliers must not offer, give, promise or agree to receive any illegal payments or other form of inducement intended to directly or indirectly exert undue influence or securing improper advantage.

This includes bribes, kickbacks, facilitation payments or other similar inducements regardless of whether such activity is considered to be part of local business practice or acceptable under local law. Monitoring and enforcement procedures shall be implemented to ensure compliance.

Gifts & Hospitality

Gifts and entertainment can create perceptions of bribery or favouritism. Suppliers shall adhere to a stringent ethical framework, ensuring these gestures comply with all applicable laws. Recording all instances of such courtesies (whether accepted or declined) is vital. To preserve fair competition, gifts and hospitality shall not be offered or accepted during business negotiations.

Conflict of Interest



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, they shall disclose it to QinetiQ and all other affected parties, as soon as possible. Suppliers are required to provide adequate training to employees who may be exposed to the risk of conflict of interest.

Fraud

QinetiQ operates a zero tolerance approach to fraud. Fraud undermines the efficient operation of economies as it undermines the framework of contract law and reduces trust. Suppliers must not behave dishonestly to deliberately facilitate fraud either for personal gain or for the benefit of others. They should conduct thorough due diligence and communicate these standards to workers and subcontractors. Suppliers must report instances of suspected fraud immediately (you can contact our dedicated mailbox fraud@QinetiQ.com).

People

Providing a safe, diverse and inclusive workplace and a respect for human rights.

Human Rights

Suppliers shall uphold, respect and protect human rights as defined by the UN Guiding Principles on Business and Human Rights (UNGPR), International Labour Organisations (ILO) and Organisation for Economic Co-operation and Development (OECD).



Suppliers are required to undertake appropriate due diligence to identify human rights impacts, investigate and report issues.

Suppliers shall encourage transparency and full disclosure through the supply chain tiers.

Modern Slavery

QinetiQ is opposed to any form of modern slavery, human trafficking, forced, bonded or indentured labour, child labour, unlawful migrant labour and worker exploitation. Suppliers must not participate in, or procure goods and services from organisations using forced, involuntary or slave labour practices that inhibits a person's freedoms (association and movement).



Suppliers are required to provide training on this topic to their internal workforce and supply chain partners. Suppliers must ensure they conduct right to work checks to prevent illegal working practices.

Compensation and Working Hours

Suppliers must comply with applicable wage and labour laws governing employee compensation and working hours. Suppliers should conduct operations that ensures a productive work environment with regulated hours of work, daily and weekly rest periods and annual leave.



As a Living Wage Employer, QinetiQ expects suppliers to support the Real Living Wage and to advocate it through its supply chain tiers.

Prompt Payment Practices

QinetiQ has made a commitment to prompt payment with our supply chain. Suppliers are required to ensure they are also paying their suppliers on time in accordance with agreed contractual payment terms. QinetiQ encourages adopting and signing up to a relevant national payment code to demonstrate this commitment.



Caring for ourselves, our loved ones, our community, our colleagues, our company, our customers, our countries and the world.

Creating a safe and secure environment for us to live well, enjoy life, live longer and be prosperous and happy.

Care and thrive today and tomorrow

Going home healthy and safe each and every day – taking care of everybody and everything around us.

Health & Safety

QinetiQ's "Care and thrive, today and tomorrow" health, safety and wellbeing programme, encourages us all to make time to show we care for everybody and everything around us and foster a supportive and compassionate work environment.

Suppliers are required to value and provide a safe, healthy and secure working culture for their employees, contractors, customers, suppliers and environment who may be affected by their activities.

Sexual Harassment

QinetiQ has a zero tolerance to sexual harassment in the workplace. We expect our suppliers to take all reasonable steps to prevent any form of sexual harassment from occurring, including as part of the services provided to us, and to provide evidence of steps that have been taken to prevent sexual harassment in accordance with their obligations, including but not limited to, evidence of risk assessments, policies, training records etc, to us upon request.

Diversity, Equity and Inclusion (DEI)

QinetiQ operates a diverse workforce and supply chain, promoting an inclusive culture to enable employees, suppliers, customers and partners to be respected and feel valued for their contribution. Suppliers must have a zero tolerance to discrimination and provide a working environment free from all forms of harassment, bullying and discrimination.



Suppliers are required to support and promote DEI within their own organisations and supply chains, providing equal opportunities and treatment regardless of race, disability, age, sex, sexual orientation or religious beliefs.

Suppliers must 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 conditions. Suppliers shall actively seek out and engage with diverse suppliers, in terms of size, ownership and geographical diversity, including Small Medium Enterprises (SMEs) and other minority-owned underrepresented businesses.

People and Communities

Suppliers are required 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, including education and skills outreach and charity.

Planet

Suppliers are required to operate sustainably, recognising the importance of protecting the environment through the emissions generated, resources consumed, and waste produced.



Suppliers are expected to minimise risk and negative impacts and behave in a way that pro-actively addresses circularity and seeks opportunities to improve biodiversity and nature.

Climate Transition Action Plan

QinetiQ has a Climate Transition Action Plan and provides updates on our progress in our Annual Report and website, to address reducing greenhouse gas emissions from our operations and supply chain. With increasing customer focus on energy and climate resilience, suppliers, including SMEs, are expected to commit to science-based targets and reduce greenhouse gas emissions to Net-Zero by 2050 or sooner. Suppliers are required to measure and report their emissions and provide carbon footprint data to QinetiQ when requested.

Suppliers are required to apply best practice circularity principles that reduce the footprint of their operations, product and service offerings; eliminate waste and pollution; consume resources sustainably, embedding circularity of products and materials and promoting positive biodiversity net gain and natural capital.



Trade Compliance

Trade Controls and Sanctions

Suppliers are required to provide information particular to their goods relating to customs and strategic exports licensing. Suppliers must understand and communicate any sanctions, import and export control or customs requirements relating to their work and ensure decisions and activities comply with those requirements.

Responsible Minerals

Suppliers are required to eliminate the use of conflict minerals which in/directly finance or fuel human rights abuses. Suppliers shall exercise responsible sourcing and due diligence, including a chain of custody in the supply of these minerals, and at a minimum require the same from their next-tier suppliers.

Counterfeit Parts

Suppliers are required to manage effective methods and processes to minimise the risk of introducing counterfeit materials or components into our supply chain. Suppliers shall immediately notify us, if counterfeit materials or components are detected or suspected.

Information Security

Suppliers shall ensure that all sensitive and personal data, information, technology, know how, IP (including the assets and equipment on which it is processed and stored) that suppliers receive or have access to, is correctly and clearly labelled, 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.

Protection of Personal 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](#). Suppliers are required to understand how to effectively and compliantly manage QinetiQ data, including holding data securely, and only sharing 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 QinetiQ's business, there is a requirement to notify 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 QinetiQ data by the supplier, or a sub/processor, and if this is on another contract out of courtesy.

Risk Management

Suppliers shall have a process to proactively identify, assess and mitigate risk associated with their operations related to the environment, ethics, health and safety and working labour practices. Suppliers are required to communicate to QinetiQ where there is a significant risk impacting the security of supply, or cost.

Continuous Improvement

Suppliers are expected to continuously improve their performance, including implementation of appropriate measures to help them comply with the key expectations of this Supplier Code.



Business Practice

This code is designed to help ensure good business practice. Suppliers are expected to assist QinetiQ in enforcing this Supplier Code by communicating its principles within their own organisation and to next-tier suppliers to ensure alignment across the supply chain.

This Supplier code is not intended to conflict with or modify any existing contractual terms between QinetiQ and our suppliers. Should conflict arise, any existing contractual terms and conditions will take precedence.

QinetiQ welcomes any feedback regarding this Supplier Code. Please direct any comments or queries to procurement@QinetiQ.com

QINETIQ

QinetiQ

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