

Supplier Code of Conduct

Introduction

NSSLGlobal Ltd is committed to providing consistency and reliability in our services and products to our customers. We recognise the high standards demanded of us and our aim is to meet or exceed these expectations and requirements each time we interact with our customers. As a means of achieving this aim, we work to ensure that all activities that we undertake are conducted in a fair, transparent and ethical manner. Our suppliers and partners are important stakeholders for us and play a vital role in the delivery of our products and services and so these relationships are critical to delivering on our commitment.

The objective of this Supplier Code of Conduct is to set out our organisation's requirements and minimum expectations across several areas. The Supplier Code of Conduct applies to all of our suppliers and their sub-contractors.

NSSLGlobal Ltd has Supplier Questionnaires in place that are associated with this Code of Conduct and must be completed by suppliers, when requested. We also request you keep us updated as to any change in your questionnaire response and, if deemed necessary, allow a representative of NSSLGlobal Ltd to conduct an audit to confirm that the requirements set out in this Code of Conduct are in operation. If the supplier is unable to permit such an audit, this could result in the termination of the supply contract. Should the audit identify any non-conformances, the supplier would be required to provide a detailed Corrective Action Plan within an agreed time frame.

Suppliers should be aware that many of our customers are governmental or enterprise organisations who seek to flow down supply chain management requirements. This may result in our including equivalent or appropriate provisions into our supplier contracts.

Ethical Behaviour and Integrity

NSSLGlobal Ltd expects the highest standards of business integrity and transparency from our partners, suppliers and sub-contractors. We expect that all transactions will comply with applicable laws, codes of conduct, policies and rules, including security requirements of our governmental and enterprise customers. We expect that our suppliers will ensure that ethical considerations have been explicitly and demonstrably established in their policies and procedures.

Bribery and Corruption

Our organisation operates a zero-tolerance policy towards bribery and corruption and we will only work with suppliers who have the same approach to these issues. Our '**Business Integrity Code of Conduct**' is applicable to our suppliers, along with NSSLGlobal Ltd employees, and details our organisation's requirements.

Suppliers must adhere to anti-bribery and corruption laws, including but not limited to, the UK Bribery Act 2010, the Criminal Finances Act 2017, and the U.S. Foreign Corrupt Practices Act of 1977.

We expect our suppliers to have rigorous processes in place to ensure that the subcontractors in their supply chain also comply with these laws. Our suppliers must agree to not offer employees of NSSLGlobal Ltd any services, gifts or benefits in order to influence decision-making processes. Gifts

include a benefit, fees, commissions, dividends, cash, gratuity, services, hospitality or any other form of inducement.

Fair Competition and Conflicts of Interest

We adhere to fair and ethical competition within the framework of applicable competition laws. We comply with PQQ and ITN/ITT requirements and public procurement rules as these may apply to procurements opportunities in which we are participating; these may also apply to elements of our supply chain.

We expect suppliers to mitigate appropriately against any conflicts of interest, whether real or perceived, and to notify us immediately if they become aware of a conflict. Potential conflicts may be organisational or individual in nature and suppliers will need to declare those conflicts and take additional steps for mitigation. We expect our suppliers to comply with any conflicts of interest policy or management plan which may be in place for a project or programme we are working on together.

Reputation & Public Trust

We expect all suppliers to be mindful of the need to maintain customer trust and protect NSSLGlobal Ltd's reputation. As such, suppliers and their sub-contractors should not engage in any act that is reasonably likely to tarnish our organisation's reputation and affect public trust. This is not intended to constrain whistleblowing or to limit a supplier's legal obligations.

Collaboration

NSSLGlobal Ltd is certified to ISO 44001:2017 and is committed to collaborative behaviours delivering value for money, innovation, continual improvement, healthy and transparent business relationships. Increasingly, our customers are mandating compliance with ISO 44001 principles of business relationship management as part of their risk mitigation activities.

We expect suppliers to follow the ISO 44003: 2021 Twelve Principles of Collaboration (focused on SMEs) in their dealings with us (including our personnel) and in any interactions with our customers and other supplier partners. Depending on the nature of the opportunity, we may apply ISO 44001 to our business relationship, in which case there will be a relationship charter, management plan and measurement tool we will need to apply and follow with our supplier.

Employee Wellbeing, Diversity, Inclusion and Equality

The most important resource and asset in our businesses is our personnel. Our employees, along with those of our suppliers, have the right to respectful treatment and a safe place of work. We do not tolerate discrimination, harassment, bullying or victimisation on any basis in the workplace or in connection with our services and expect the same of our suppliers.

We require our suppliers, and their supply chain, to promote equal opportunities for their employees as defined by the Equal Opportunities Act 2010 or equivalent and to prohibit behaviour, including gestures and language, that is sexual, threatening, abusive, or coercive.

NSSLGlobal Limited is committed to be an employer supporting UK Armed Forces veterans and is a Level 1 Disability Confident Employer.

Human Rights

NSSLGlobal is a signatory to the United Nations Global Compact and has committed to a number of UN Sustainability Development Goals as they relate to its business.

Our suppliers must comply with all applicable human rights and employment laws in the jurisdictions in which they work and have a robust means of ensuring that their supply chain is similarly compliant. These laws include the provisions of the Modern Slavery Act 2015.

In our Supplier Questionnaire, we request confirmation that our suppliers and their supply chain do not engage in human trafficking, exploitation or slavery. This includes child labour (below the minimum age for employment in the relevant country), involuntary prison labour, forced, compulsory or bonded labour. Our suppliers are expected to confirm that they have not been convicted of any offence involving slavery and human trafficking; nor have they been the subject of an investigation, inquiry or enforcement proceedings regarding any offence.

We expect our suppliers to co-operate with any modern slavery audit or diligence investigations we are obliged to undertake to comply with our legal obligations, or any voluntary inclusion in a governmental modern slavery register.

Confidentiality, Data Privacy and Security

NSSLGlobal Ltd, along with our suppliers, are expected to comply with both contractual provisions and any legal requirements to protect commercial and sensitive information. This includes the protection, transfer, access and storage of confidential, proprietary and personal information, as laid out in all applicable local laws. Information should not be used for any purpose other than the business purpose for which it was intended, unless the owner of the information has authorised its use. NSSLGlobal Ltd will disclose information only if it is compelled to do so by law or under the requirements of applicable local data protection and privacy laws.

Cyber security is of the utmost importance to NSSLGlobal Ltd and our suppliers are required to safeguard our data. Many of our customers are governmental and, as such, we have heightened obligations for security of information and assets, e.g. Security Aspects Letters may be issued by UK Government for our suppliers (and their relevant personnel) to sign. We take this extremely seriously and expect our suppliers to do the same.

Suppliers must inform us immediately of any cyber security incidents and/or loss of our information and fully co-operate with us in any necessary investigation and subsequent actions. Where it is appropriate, suppliers should seek accreditation with a relevant cyber certification scheme. Our Supplier Questionnaire requests copies of certification where applicable, and asks for detailed information related to cyber security; this must be completed and returned. NSSLGlobal is ISO 27001:2013 certified.

Health & Safety

We expect our suppliers to protect the health and safety of their own employees, as well as the employees of NSSLGlobal Ltd when attending their place of work. Suppliers must comply with the Health & Safety at Work etc Act 1974 and all relevant Occupational Health and Safety Regulations and guidelines that fall out from the Act or local equivalents.

Suppliers are required to ensure that their employees are properly trained on health and safety risks along with safe work practices. They must implement appropriate measures to avoid occupational illness, injuries and damages to property and minimise the risks associated with health and safety hazards. Suppliers are expected to provide the necessary equipment for their employees to work without injury and, should an incident occur, suppliers are required to report those incidents

accordingly. On occasion, we may ask suppliers to participate in investigations around health and safety incidents and, if necessary, we may require that they provide a detailed Corrective Action Plan. NSSLGlobal is certified to ISO 45001:2018.

Environment

NSSLGlobal Ltd is certified to ISO 14001:2015 and is committed to ensuring that sustainable development and effective environmental management are at the core of all activities undertaken by our organisation.

Similarly, we expect our suppliers to implement sustainable business practices and to act in accordance with all applicable statutory and international laws, regulations and standards regarding environmental protection. Suppliers' goals should include reducing waste and harmful products, minimising environmental pollution, promoting energy efficiency and reducing their overall impact on climate change. We strongly recommend that our suppliers develop a sustainable environmental policy and Carbon Reduction Plan, and have in place a reasonable environmental management system.

Obsolescence Management

Obsolescence Management is of high importance to NSSLGlobal Ltd and we require our suppliers to proactively look for obsolescence risks to systems, components and materials and, if an issue or risk is identified, notify us at the earliest opportunity. We expect suppliers to work with us in order to identify components with an end-of-life or end-of-support, future obsolescence and possible options for rectification or replacement. In situations where it may be deemed necessary, we may ask suppliers to produce an obsolescence management plan for better monitoring and control.

Social Value

In the UK, Social Value is defined through the Public Services (Social Value) Act (2013) which requires all public sector organisations and their suppliers to look beyond the financial cost of a contract to consider how the services they commission and procure can improve the economic, social, environmental and general wellbeing (benevolence) of an area where they are working and the people they will be working with. This is an increasing theme in public sector contracts, including those requiring our ICT and project engineering and network operation services and expertise.

Since 2021, a new Social Value Model has been in place, which obliges central government to go beyond the Social Value Act 2012. It was launched with the aims of:

- Creating new jobs and promoting skills
- Encouraging economic growth
- Supporting COVID-19 recovery
- Tackling climate change
- Levelling up the UK

UK public sector organisations inviting tenders for work over £180K are obliged to ask potential suppliers about social value. We, and our supply chain partners, will be expected to be aware of what this means, have an active social value plan and be able demonstrate both understanding of, and commitments to, social value into our bid responses.

The new social value in the procurement model is used by government bodies to assess the social impact of suppliers. A 10% weighting is placed on social value in quality responses, when bidding for central government contracts.

We will ask our key suppliers to provide us with an annual (or bi-annual) statement as to their social value activities. Depending on the bid, we may ask suppliers to specify case study information to support a quality response for a bid where you are a part of our supply chain.

Continuous Improvement

We expect our suppliers to use recognised industry practices in the delivery of goods and services to, or on behalf of, our organisation. As an ISO 9001:2015 certified organisation, we also expect suppliers to continuously review and improve upon the processes related to the delivery of these goods and services. Where possible, we request copies of certification relating to quality management or evidence of a quality management system in place.

In the case that NSSLGlobal Ltd receives a complaint made against a supplier or their employees, we expect that supplier to work with us honestly and openly to investigate the matter. We will work with the supplier to understand the circumstances around the complaint and, as appropriate, to agree action to rectify the problem and avoid any repetition in future.

With regards to quality of information and data received from our suppliers, we expect that it is provided in a timely manner and containing no known errors. If a supplier becomes aware that they have given us incorrect or misleading information, they should notify us quickly and submit amended information as soon as possible.

Our suppliers are also expected to have in place a sufficient Business Continuity Disaster Recovery plan to both protect the employees and work environment as far as reasonably possible and to limit any disruptions to their business. This may include natural disasters, cyber-attacks, terrorism, pandemics, etc.

Sanctions, Import and Export Restrictions

Military and certain Dual Use goods are subject to import and export restrictions by the UK Government. Our suppliers are required to provide us with sufficient information, certification, documentation and other reasonable assistance in obtaining any necessary UK import or export licences where necessary. Our Suppliers are also expected to be fully compliant with all relevant regulations relating to equipment or goods (including raw materials and work in progress) supplied to us, including importation and licensing.

Suppliers providing goods subject to foreign import and export restrictions, for example International Traffic in Arms Regulations (ITAR) and Export Administration Regulations (EAR), must provide sufficient information, certification, documentation and other reasonable assistance so goods can be managed in accordance with these regulations. All import and export conducted by suppliers must be compliant with sanction legislation. Where NSSLGlobal purchases equipment or goods from suppliers, it is their responsibility to confirm to customs authorities by providing acceptable evidence that the items (particularly raw materials) do not originate from countries subject to sanctions.

Evidence could include Certificate of Origin, Mill Test Certificate(s) or a Declaration of Processing operations after compliance of diligence activities, or other acceptable documentation. Suppliers should provide all assistance requested of customs authorities to ensure they are satisfied and should undertake due diligence to ensure the accuracy of the information submitted.

NSSLGlobal will not be obliged (and will have no legal liability for a failure) to complete any purchase or order of equipment, goods or articles which would be in contravention of sanctions. We reserve the right to postpone or cancel any order or fulfilment until we are satisfied on the matters set out above.

Prompt Payment

We expect our suppliers to be fair and reasonable in their payment practices. Suppliers should pay sub-contractors within 30 days on NSSLGlobal Ltd contracts and comply with the standards set out in the Prompt Payment Code and Public Contracts Regulations 2015 or other applicable local laws. We aim to pay 100% of undisputed, valid invoices which are supported by a Purchase Order within 30 days of receipt.

Public Announcements

Our suppliers should not issue any form of publicity or make any statements referring to NSSLGlobal Ltd, without first obtaining prior written permission, except where it is required by law. Suppliers can submit any such request to our Marketing Department (marketing@nsslglobal.com).

Reporting Breaches of the Code

All suppliers are expected to monitor their own compliance with this Code of Conduct. Any known or potential breaches should be reported immediately to logistics@nsslglobal.com

By signing this Supplier Code of Conduct, you agree that you have read and understand the document and will comply with all of its requirements.

Organisation Name	
Address	
Name of Authorised Signatory	
Signature of Authorised Signatory	
Date	