

Supplier Code of Conduct

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Portsmouth Technology Park, 2nd Floor South Suite (Rm 2.4), National Maritime Systems Centre,
Southwick Road, Portsmouth, PO6 3RU, UK

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“At Sirius, we believe that trust, integrity and excellence are fundamental to delivering value for our customers.

As a strategic consultancy and digital services partner supporting critical programmes across defence, government and industry, we rely on a network of suppliers and partners who share our commitment to responsible business.

This Supplier Code of Conduct sets out the standards we expect throughout our supply chain. It reflects the principles that guide our own people and supports our ambition to be a trusted partner, an employer of choice and a force for positive impact.

We expect our suppliers to uphold these standards and promote them throughout their own organisations and supply chains.”

David Bangert, CEO

About Sirius

We help to solve complex challenges, support our clients to make informed investment decisions, and deliver successful outcomes through data-driven analysis and digital innovation.

We provide end-to-end support across the project lifecycle, combining deep technical expertise with a pragmatic, solution-agnostic approach.

Our Core Values

Our values define how we work with clients and empower our team to deliver innovative solutions; creating trusted partnerships and deliver exceptional results.



Supplier Code of Conduct

At Sirius, we are committed to working collaboratively with suppliers who share our values and commitment to responsible business.

Together, we can deliver outstanding outcomes for customers, support our communities and build a sustainable future.

Purpose

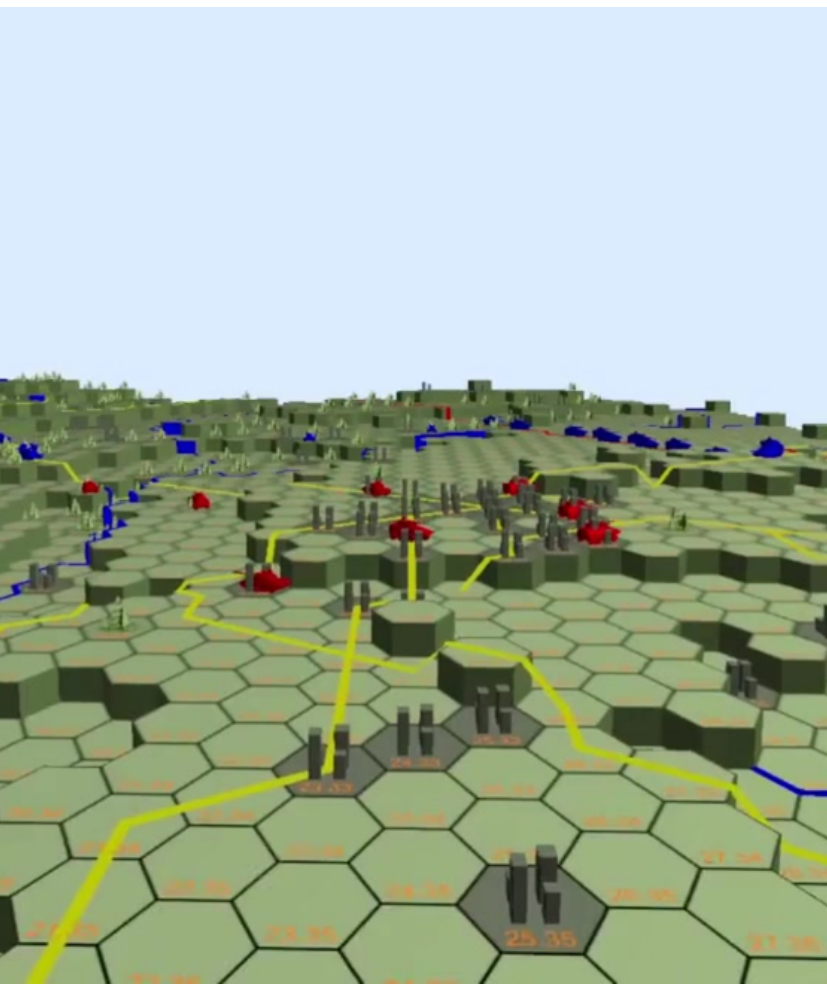
This Supplier Code of Conduct sets out the standards Sirius expects itself, its suppliers and its supply chain partners to meet. Suppliers must apply these principles within their own organisations and, where appropriate, throughout their supply chains. Compliance with this Code supports lawful, ethical and responsible business conduct and helps protect Sirius, its suppliers and its customers.

Laws and Regulations

This Supplier Code of Conduct is founded on the principle that all parties must comply with applicable laws, regulations and regulatory requirements when performing their duties. Where this Code imposes a higher standard than applicable law, suppliers are expected to meet the standard set out in this Code.

Health and Safety

Sirius is committed to a safety-first culture that protects its people and anyone else who may be affected by its activities. Suppliers must provide, and maintain, a safe and secure working environment for employees, contractors, customers and other relevant third parties. Compliance with health and safety law is a minimum requirement; Sirius expects suppliers to promote safe behaviours and a strong safety culture in support of continuous improvement.



We seek to build long-term relationships with suppliers that:

- Demonstrate integrity and accountability
- Promote innovation and continuous improvement
- Create positive social value outcomes
- Support environmental sustainability
- Foster inclusive and respectful workplaces
- Deliver quality and excellence for customers



Anti-Corruption

Suppliers must comply with all applicable anti-corruption laws and regulations, including, where relevant, the US Foreign Corrupt Practices Act 1977, the UK Bribery Act 2010, or equivalent legislation. Sirius has zero tolerance for bribery and corruption in any form.

Suppliers must not offer, promise, give, request, accept or receive any payment, gift, hospitality or other benefit that could be construed as a bribe, kickback or other improper inducement, whether directly or through a third party. Suppliers are expected to conduct reasonable due diligence and maintain appropriate procedures and controls to prevent, detect and address bribery and corruption in their business activities.

Gifts and Hospitality

Suppliers must ensure that any offer, provision, request for, or receipt of gifts or hospitality is lawful, proportionate, transparent and consistent with the policies and standards of both the donor and recipient organisations. Gifts and hospitality must never be cash or cash equivalents, and suppliers should maintain and follow an appropriate gifts and hospitality policy.

Human Rights

Suppliers must treat all people with dignity and respect and promote an ethical and inclusive working environment. Suppliers must comply with all applicable laws and regulations relating to human rights, modern slavery, human trafficking, forced labour and child labour, including the Modern Slavery Act 2015 where relevant. Suppliers must also maintain effective measures to prevent such practices within their own operations and supply chains.

Responsible supply chains, trusted partnerships



Connecting teams, partners, and communities

Trade Compliance

Suppliers must comply with all applicable import, export, sanctions and trade control laws and regulations. Suppliers are expected to understand the trade compliance requirements relevant to their activities and to ensure that all decisions and transactions comply with those requirements.

Environment and Sustainability

Sirius recognises its responsibility to reduce the environmental impact of its activities. Suppliers are expected to operate responsibly by managing greenhouse gas emissions, resource use and waste, and by seeking opportunities to reduce adverse impacts on biodiversity and the natural environment. Sirius welcomes supplier initiatives that support environmental improvement and sustainable business practices.

Cyber Security

Suppliers must protect sensitive and classified information, including the assets and systems on which it is processed or stored, using appropriate technical and organisational measures.

Information must be clearly identified and handled according to its sensitivity, and access to classified information must be limited to authorised individuals with the necessary clearance and a legitimate need to know. Failure to protect such information may be unlawful and could cause significant harm to Sirius, its customers and national security interests.



Social value

Sirius encourages suppliers to engage positively with the communities in which they operate, support economic development and contribute to wider social value outcomes.

Suppliers should seek opportunities to deliver lasting and measurable positive social impact where appropriate.



Conflicts of Interest

Suppliers must identify, avoid and appropriately manage actual, potential and perceived conflicts of interest in their dealings with Sirius. Where a conflict arises or may reasonably be perceived to arise, suppliers must disclose it promptly to Sirius and any other affected parties.

Accurate Record Keeping

Suppliers must create, maintain, store and retain accurate and secure business records as appropriate to their activities and legal obligations.

Prompt Payment Practices

Sirius is committed to prompt payment practices in accordance with the Fair Payment Code. Suppliers are expected to pay their own suppliers in accordance with agreed contractual terms and are encouraged to adopt an appropriate national payment code where relevant.

Integrity

Sirius expects suppliers to act with honesty, respect and integrity in all business dealings.



Antitrust and Competition

Suppliers must engage in fair and lawful competition and comply with all applicable antitrust and competition laws. Suppliers must never discuss, collude or agree to:

- Fix or control prices, terms or conditions;
- Restrict competition or dealings;
- Share confidential information with current or potential competitors, or any other relevant party;
- Divide or allocate clients, markets or territories; or
- Choose not to submit a bid, withdraw a bid or submit an artificial bid to influence the outcome of a bidding process with any other party or parties.

Money Laundering

Suppliers must always:

- Promptly report any actual or suspected money laundering activity;
- Comply with applicable anti-money laundering laws and regulations;
- Take reasonable care to avoid involvement in money laundering or other criminal activity; and
- Recognise and monitor warning signs that may indicate unusual or suspicious activity.

Inclusion, Diversity and Belonging

Sirius expects suppliers to foster inclusive workplaces in which individuals are able to contribute, develop and perform to their full potential.

Suppliers must respect cultural differences and treat all individuals fairly and with respect, without unlawful discrimination. Suppliers are expected to uphold integrity and accountability in all interactions and to strengthen inclusive practices within their organisations.



Tax Evasion

Suppliers must always:

- Apply a zero-tolerance policy with respect to any criminal facilitation, including tax evasion, and never accept being complicit in facilitating a third-party to evade taxes in any jurisdiction;
- Comply with all tax laws and regulations in the jurisdictions in which they operate;
- Act carefully to avoid being involved, used in or facilitating tax evasion or other criminal activities;
- Have reasonable procedures in place to prevent the facilitation of tax evasion;
- Recognise and monitor potential warning signals that could help detect unusual or suspicious activity; and
- Co-operate constructively with any investigation conducted by Sirius, its customers, or any authority or tribunal of competent jurisdiction.



Trusted insight. Meaningful impact. Delivered together.

“If everyone is moving forward together, then success takes care of itself.”

Inappropriate Behaviour, Bullying and Harassment

Suppliers must prohibit bullying, inappropriate behaviour and harassment in any form and ensure that all individuals are treated with dignity, fairness and respect. Suppliers must comply with all applicable legislation and ensure that individuals can work and interact in an environment free from harassment.

Non-Retaliation Policy

Suppliers must support an environment in which individuals feel able to raise concerns in good faith. Retaliation against any person who raises a concern or participates in an investigation in good faith must not be tolerated.

Speak Up

Suppliers must raise concerns promptly where they identify actual or suspected misconduct, non-compliance or other relevant issues. Concerns may be reported to Commercial@sirius-analysis.co.uk.



Where a supplier does not meet the expectations set out in this Supplier Code of Conduct, Sirius may review that supplier's position within its supply chain and take such action as it considers appropriate.

If you have any feedback, comments or queries about this Supplier Code of Conduct, please contact Commercial@sirius-analysis.co.uk.