

Policy Title:

NCC SUPPLIER CODE OF CONDUCT

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1 FOREWORD

Welcome, and thank you for your contribution as a valued member of our NCC supply chain.

At NCC, our suppliers play a critical role in helping us deliver our mission of enabling UK innovators and industry to thrive. The Supplier Code of Conduct sets out the principles, values, and standards that underpin our relationships with suppliers and provides clear guidance on the behaviours and expectations required of all organisations working with us.

As an organisation operating at the forefront of innovation, often within global markets, our success depends on a capable, responsible, and high-performing supply chain that shares our commitment to excellence, integrity, collaboration, and continuous improvement.

Each year,¹ NCC supports approximately 300 businesses, contributes to the creation and sustainment of around 800 jobs, engages more than 1,400 learners, and supports over 30 graduates and apprentices. These achievements would not be possible without the expertise and commitment of our suppliers and partners.

This Supplier Code of Conduct outlines the standards expected of suppliers, their employees, partners, and subcontractors when delivering goods and services to NCC. We expect all suppliers to conduct business in a manner that aligns with our values, promotes innovation and expertise, and supports opportunities for start-ups and small and medium-sized enterprises throughout the wider supply chain. Compliance with these expectations is an ongoing requirement, and where concerns arise, NCC will review the circumstances and take appropriate action.

This document also provides prospective and existing suppliers with a clear understanding of the standards and obligations associated with working with NCC. As part of our supplier selection processes, we undertake appropriate due diligence to ensure that we engage with reputable and responsible organisations.

NCC adopts a hybrid approach to procurement, reflecting the source and conditions of funding. Where funding arrangements require compliance with public procurement legislation, NCC will adopt a public procedure in accordance with the principles of public procurement act. Where such requirements do not apply, procurements will be undertaken in accordance with applicable contract law and NCC's internal procedures. In all cases, NCC is committed to fair access to opportunities, transparency, and equitable treatment throughout procurement activities.

This Supplier Code of Conduct complements the contractual obligations and procurement requirements that apply to our suppliers. Where any inconsistency arises, the relevant contract and procurement documentation shall take precedence.

We expect all suppliers to communicate and uphold the principles contained within this Code throughout their organisations, including employees, parent companies, subsidiaries, partners, and

¹ This is an initial estimate of NCC's annual average impact from 2017 – 2022.



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subcontractors. NCC is equally committed to promoting these standards across its own workforce and operations.

Together, we can build a responsible, innovative, and high-performing supply chain that delivers lasting impact.

Timothy Rose

Chief Operating Officer



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2 ABOUT US

A world-leading innovation organisation that turns cutting edge research and technology into industrial impact.

Part of the High Value Manufacturing (HVM) Catapult and the University of Bristol, we've evolved from our origins as the National Centre of Excellence in composite technology.

We provide a gateway to world-class expertise, advanced facilities, and industrial collaboration. A not-for-profit organisation, we leverage these assets to complement our customers' capabilities, helping them to develop their people, grow, compete, and succeed through technology and product leadership.

As well as working with industrial partners, we help create the conditions that enable UK innovators and industry to thrive. This includes providing national and local decision-makers with insight and evidence to inform strategy, policy, and investment decisions.

3 NCC VALUES

3.1 Be part of something bigger

At NCC, the expectation is that our Supply Chain help shape the future through innovation, collaboration, and purpose. Our values drive everything we do —from creating a more sustainable world to supporting one another every step of the way. We are proud to hold a Best Companies One Star accreditation, recognising our commitment to employee engagement, inclusion, and wellbeing.

3.2 Culture & Values

Our culture is grounded in strong values which shape how we work and guide every interaction — with our people, our places, our customers, and the wider industry.

- **Make a Difference** – This is about taking initiative and driving impact that matters to society today. It captures the spirit of focusing on meaningful action, reflecting supply chain drive to have real-world impact, take ownership, and stay connected to the bigger purpose.
- **Push the Boundaries** – Agility and innovation have always been part of what makes NCC special. Push the boundaries captures our curiosity, ambition, and courage to lead. NCC encourage the supply chain to support this by staying flexible, embracing uncertainty, and growing through challenges. This value invites the supply chain to explore what's possible and move forward with clear purpose, particularly relating to mutual gain for both parties.
- **Deliver Excellence Together** – We've always prided ourselves on understanding customer needs and delivering real value. NCC expects its supply chain to embrace, recognising that



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excellence comes from how we work together. It's about building strong relationships, sharing knowledge, and trusting each other, succeeding by solving problems side by side — listening, learning, and delivering, together.

- Care About Our Future - Inclusivity and social responsibility have always been core to who NCC are. Care about our future is about acting ethically, sustainably, and securely, while supporting the growth of those involved. Whether protecting data, creating space for personal development, or championing inclusion, this value reminds NCC and its supply chain that a strong future depends on how we care for people, the planet, and the systems that support us all.

To help tackle some of the world's most complex engineering challenges, we are committed to creating a diverse and inclusive innovation environment — one where everyone is respected, valued, and recognised for their unique contribution.

3.3 Equality, Diversity and Inclusion

We promote employee wellbeing through regular events, celebrations, and awareness campaigns focused on topics such as mental health, neurodiversity, disability, and inclusion. Each year we take part in a variety of wellbeing celebrations and awareness campaigns. As a Disability confident employer, we also organise talks for employees covering topics such as neurodiversity, mental health awareness, wellbeing and disability support and awareness.

Our Affinity Groups, led by NCC staff, provide safe, supportive spaces for people with shared identities or experiences to connect, raise awareness, and drive positive change:

- PRIDE+ Allies – LGBTQ+ colleagues and allies
- Embrace – Minority ethnic heritage, nationalities, and religions
- Women's Led Network – Supporting women in industry
- Neurodiversity in NCC – Neurodivergent colleagues and allies
- USAG – Uniformed Services Affinity Group – supporting colleagues who are members of, supporters of, or have an affiliation with the uniformed services

We are committed to building a workplace where respect, collaboration, and continuous improvement thrive — enabling us to make a meaningful impact on society.

3.4 Learning & Development

NCC cascades its desire and drive to develop its staff and stakeholders down through its supply chain. We encourage our supply chain to adopt a proactive positive approach to learning and development of its supplier's staff, sub-contractors and wider supply chain.



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From hands-on learning and structured development programmes to external qualifications and on-the-job coaching, we support, encourage, and want to engage with supply chains that adopt such practices.

4 PURPOSE

NCC wishes to engage with supply chain and 3rd parties who operate in an ethical and responsible manner when conducting business, putting engagements with stakeholders at the heart of how they interact and treat stakeholders. The purpose of the Supplier Code of Conduct is to outline the expectations NCC has of its supply chain and how we will work with suppliers to build trust and deliver value.

This Supplier Code of Conduct strengthens the principles of working together and is intended to help suppliers and those working for NCC understand the standards and behaviours that are expected when working on an NCC contract and site.

The expectations detailed within this code are based on the high standards of conduct that NCC expects of its employees. The same expectation applies to our suppliers, and for them to ensure that their employees, partners and subcontractors do the same.

In delivering these commitments it is essential to ensure adherence to the highest standards of ethical and professional behaviour. Our suppliers play an important role in the delivery of projects/services and meeting project/NCC's objectives, so our relationships with them are critical to delivering on those commitments.

As we move from procurement to the life of the contract, we expect delivery should be in accordance with the spirit of the contract. It is an expectation that suppliers, in delivering goods and services to NCC, wherever they operate, acting in a manner that is compatible with NCC values, upholding the reputation of NCC. Promoting innovation and expertise will open up the market to small and medium-sized enterprises, which contributes to the growth and prosperity in the UK.

We recognise that in many cases a supplier can only be as good as its customer. In return, suppliers can expect us to place risk with the party best able to manage it, creating the right conditions for innovation, establishing a culture of collaboration between suppliers, and subcontractors, and on time payment.



5 Supply Chain Employees

5.1 Respectful Treatment

NCC employees, and those of our suppliers have the right to respectful treatment. We will not tolerate discrimination, harassment or victimisation in the workplace or in connection with any contract. We expect our suppliers to provide the same commitment, including to their own employees. [The Equality Act 2010](#) protects against discrimination, harassment and victimisation. This includes sexual harassment under the [Worker Protection Act 2023](#) and we expect our employees and suppliers to create an environment where everyone feels safe in the workplace.

5.2 Professional Behaviour

NCC commits to work constructively and collaboratively with its suppliers. We expect suppliers to speak out, without fear of consequences, when a project or service is unlikely to succeed because of NCC behaviours or a lack of good governance. The same behaviour is expected when a contract is no longer fit for purpose, for example, in its contractual stipulations or measures.

5.3 Meeting NCC Needs

It is important that contracts with our suppliers meet the needs of NCC business requirements. We will work together with suppliers to articulate these outcomes to ensure that the goods and services being provided meet the business needs and we expect fully reciprocal behaviour from suppliers.

5.4 Vulnerable Employees

Some contracts may require working with colleagues with needs such as physical or mental disabilities, medical conditions or other factors that place them in a vulnerable position. Suppliers will ensure that these employees are always treated with courtesy and that their dignity, safety, security and wellbeing is always treated as a priority concern.

5.5 Human Rights and Employment Law

NCC and suppliers must both comply with all applicable human rights and employment laws in the jurisdictions in which they operate. For example, this includes complying with the provisions of the Modern Slavery Act 2015. In addition, suppliers must have robust means of ensuring that the subcontractors in their supply chain also comply.



6 Business Practices

6.1 Management of Risk

NCC aims to ensure that risk is allocated to the party best able to manage it, which is determined by the completion of a risk assessment. To assist us in making that judgement we will, where appropriate, engage with the market to understand its views to make informed decisions. We do not expect suppliers to be made responsible for managing a risk that is best managed by NCC. We expect suppliers not to pass down risk inappropriately to subcontractors, and not to assert that they can manage risk that is in fact better managed by NCC. All parties should be prepared to share intelligence of supply chain risks, so that material commercial and operational risks, for example the impact of losing a key supplier, can be mitigated. We expect risks that are highlighted through the supply chain by sub-contractors and direct contracted entities are brought to light in a transparent and timely manner.

6.2 Health & Safety

NCC is committed to achieving the highest possible standards of health and safety performance on its premises and sites. NCC recognise that, to do this effectively, it is of paramount importance that its supply chain fully supports and commits to the same aims and objectives. We believe that only by working closely with our supply chain, jointly focusing on common health and safety objectives, can a measurable and sustainable improvement in health and safety performance be secured.

We will challenge the safety standards of all our contractors on all our sites. We will recognise safe working and good practice. We will exclude contractors that don't or won't meet our high safety standards on sites. We aim to make safety personal, deliver our promise by aiming to succeed, find a better way of working, work as a team and lead by example.

Contractors delivering contracts on NCC behalf must ensure that contractual requirements are achieved. To do this, organisations should recruit, train, and develop their workforce to ensure an appropriate mix of skills, competencies and experiences are in place to deliver the requirements of the contract. We expect our contractors to:

- Be able to demonstrate that employees they employ have the appropriate skills, equipment and experience to deliver the contract requirements.
- Ensure that they do not place their own employees, other contractors, visitors, the general public or NCC at risk physically, reputationally or legally.

Health and safety of all workers is paramount. Contractors should ensure all workers operate in an environment which does not pose any unnecessary risks and complies with relevant site rules, submitted Risk Assessment Method Statement (RAMS) and Safety System of Work (SSOW), health and safety legislation and best practices. We expect all contractors to ensure that Health and



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safety standards are rigorously implemented and adhered to and are supported by suitable accreditation under SSIP (Safety Schemes in Procurement i.e. CHAS, Safe Contractor, Achilles etc)) or equivalent recognised health and safety accreditation scheme.

6.3 Onsite

It is a mandatory requirement that all suppliers report to reception upon arrival at NCC locations where you will be required to sign in. Once on-site, you will be issued with a lanyard and directed to the contractor induction room at your pre-agreed timeslot to complete a site induction and RAMS Pack and permit approval process. When on-site, it is required that the issued lanyard is always worn, or if undertaking a task where it poses a risk, that it is readily to hand to display upon request.

Smoking, the playing of music, or use of language that will cause offence is not allowed at any NCC sites. It is expected that when onsite Suppliers wear suitable clothing and footwear, preferably with supplier branding so that individuals are easily identifiable.

Parking at site should only be in the dedicated parking bays and not in any restricted parking zones, or non-parking areas, unless prior consent has been obtained from NCC's Estates Team.

Suppliers are welcome to use the on-site welfare facilities respectfully, and should they be found in an unacceptable condition or in need of repair, should report concerns to NCC Estates.

NCC operates across busy sites, so it is essential that our suppliers always maintain a safe working area. Suppliers should always, unless otherwise agreed, ensure that waste generated by their efforts are removed by them.

6.4 Continuous Improvement

We expect our suppliers to use recognised industry practices in the delivery of goods and services to NCC. We expect suppliers to continuously improve goods and services and bring innovation, ideas and expertise to help address strategic challenges, supporting UK growth and prosperity. We will endeavour to create the right conditions to allow suppliers to innovate both during the procurement process and the life of a contract.

6.5 Collaborative Delivery

Some of the services that NCC require are complex, and no single supplier will have complete contractual responsibility for every element of what is needed to deliver to the end requirement. In such cases, we will endeavour to create and maintain a culture that facilitates collaboration between all suppliers and NCC to ensure that the right outcomes are achieved. To achieve this, we expect suppliers to be aware of how they contribute to overall delivery, and to work collaboratively with us and other suppliers to manage mutual dependencies, ensuring their product or service is used effectively in the delivery of high quality.



6.6 Data Quality

A robust delivery model including its pricing structure is dependent on the quality of data on which it is based. NCC will provide accurate data and/or build in flexibility (consistent with procurement legislation) to allow for subsequent validation of data, particularly where new services are being provided, for example, through the use of pilots. For NCC to be able to do this, where a contract is being re-procured, we will require incumbent suppliers to act in a timely manner and be forthcoming with information required for scoping the re-procurement and the tendering process (for example workforce information) and to behave in accordance with any required standards. As per the contractual obligations, this information should be provided promptly when requested by NCC and updated as required, for example, during any transitional phase leading to transfer of the provision of the services.

6.7 Value for Money

NCC expects to obtain value for money in all activities, sometimes this may to demonstrate long-term value to the taxpayer when undertaking public procurement, or to NCC clients when undertaking private procedure procurements. This means that contracts should be priced to offer sustainable value throughout their life, including when changes are needed. Whilst we accept that our suppliers make a fair profit margin in return for the risk they are accepting and the commitments and investments they make in order to be able to deliver projects/services for us, we expect suppliers not to exploit an incumbent or monopoly position, an urgent situation or an asymmetry of capability or information to impose opportunistic pricing.

We will engage constructively with suppliers in relation to any required changes and we expect suppliers to reciprocate this. We expect suppliers to work in good faith to resolve any disputes promptly and fairly during the life of a contract through good relationship management and, where appropriate, contractual dispute resolution mechanisms, recognising that interests are rarely best served by protracted litigation.

We will seek to award contracts based on value for money, that includes price and quality, as well as appropriate sustainable / social value criteria when applicable. We will measure supplier performance on relevant and proportionate indicators and apply proportionate contractual remedies for non-compliance.

6.8 Reputation and Trust

We want to work with suppliers who are proud of their reputation for fair dealing and quality delivery. We want our suppliers to regard working with NCC as an opportunity to strengthen their reputation through the delivery of high-quality, ethical, and innovative services. We expect all parties to be mindful of the need to maintain trust and protective of NCC's reputation, and ensure that neither they, nor any of their partners or subcontractors, bring NCC into disrepute by engaging in any act or omission which is reasonably likely to diminish the trust that clients, partners and the



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general public place in NCC. This is not intended to limit any supplier's legal obligations or constrain whistleblowing or their ability to fairly criticise NCC or policy.

6.9 Cyber Security

It is essential that suppliers safeguard the integrity and security of their systems and comply with relevant standards and guidance with the NCC strongly preferring to work with suppliers who can demonstrate adherence to the NCSC-backed Cyber Essentials scheme. Suppliers must inform NCC's [Information Security Team](#) if they become aware of any cyber security incident affecting its work with NCC.

6.10 Data Protection

The Supplier must comply with all applicable data protection, privacy, and information security laws and regulations, including but not limited to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. The supplier will notify the NCC's [Data Protection Officer](#) of any actual or suspected data breach or unauthorised access involving NCC information immediately upon becoming aware of the incident, and in any event no later than 24 hours after discovery.

6.11 Sustainable Procurement

We expect our suppliers to be aware of, and support NCC in, complying with its legal and contractual obligations under sustainable legislation. We expect our suppliers to assist NCC in the understanding and reduction of supply chain impacts on our environment, and risks related to the security of raw material supply. We expect suppliers to be open and transparent in assisting NCC in reporting on product or service utilisation and any environmental impacts.

6.12 Community Engagement

At NCC we believe that it is important that engagement is held with affected communities across UK, and that they are treated in a respectful manner. Community engagement is the responsibility of all parties that we operate and work with.

6.13 Confidentiality

NCC and its suppliers are both expected to comply with the provisions in our contracts and any legal requirements to protect commercial and sensitive information. Both parties may both also be party to confidential information that is necessary to be effective partners. Prior to the handling of data, we expect the Supply Chain to sign an NDA (Non-Disclosure Agreement) This information, even if it is not covered by contractual provisions, should be handled with the same care as information of similar sensitivity. Notwithstanding this mutual understanding, suppliers should recognise that this



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does not prevent us from disclosing information where we are compelled to do so, for example, by law.

6.14 Intellectual Property

NCC intellectual property (IP) and that of its clients is very important to the NCC. Failure of NCC to protect IP assets could have significant adverse effects on financial, commercial and/or technological aspects for us. Our supply chain play an important role in safeguarding IP through protection of confidential information, documentation, software, equipment, material tools, and technology from unauthorised use.

6.15 Conflicts of Interest

We expect suppliers to mitigate appropriately against any real, potential or perceived conflict of interest through their work with us. A supplier with a position of influence gained through a contract should not use that position to unfairly disadvantage any other supplier or reduce the potential for future competition. For example, by creating a technical solution that locks in the supplier's own goods or services as there is no alternative, unless consent from NCC has been provided.

We expect our suppliers to notify us if they become aware of any real or perceived conflict of interests. Potential conflicts may be organisational or individual in nature. We will require organisations or individuals to take additional steps to mitigate these and will ask suppliers to declare those interests.

6.16 Whistleblowing

We expect suppliers to have a comprehensive whistleblowing policy which allows employees to report any incidents or concerns anonymously, safely and without repercussion. Should there be any concern or grievances with supply chain members that could have direct impact to the operations or reputation of NCC, notification can be made to the Head of Sustainable Procurement via email: procurement@nccuk.com

6.17 Monitoring and Reporting

The Supplier Code of Conduct is intended to set out the way in which we and our suppliers will behave towards each other. It is not intended to be legally enforceable, to create any legal obligations or rights, or to undermine our contracts with suppliers or the rules we set out when we procure our goods and services, which at all times shall take precedence. For the avoidance of



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doubt, the Supplier Code of Conduct does not take precedence where the courts or other institutions such as a regulatory agency, authority or body have jurisdiction.

Both parties should be open and transparent with each other and report any instances of non-compliance. In these circumstances, the first step is for the relevant NCC representative and the supplier to discuss and, where appropriate, agree suitable remedial actions. If a party considers that an issue has not been resolved by discussion, it may escalate it to the Head of Sustainable Procurement or if extreme the Director of Estates and/or Director of HR.

7 Standards of Behaviour

7.1 Ethical Behaviour

NCC expects the highest standards of business ethics from suppliers and their agents in the supply of goods and services. We expect suppliers to be explicit about the standards they demand of executives, employees, partners and subcontractors and to have governance and processes to monitor adherence to these standards.

7.2 Counter Fraud and Corruption

We demand that suppliers adhere to anti-corruption laws, including but not limited to the Bribery Act 2010 and anti-money laundering regulations. We expect suppliers to have robust processes to ensure that the subcontractors in their supply chain also comply with these laws. We have zero tolerance of any form of corrupt practices including extortion and fraud that we become aware of, and we expect suppliers to be vigilant and proactively look for fraud, and the risk of fraud, in their business. Suppliers should immediately notify NCC [Procurement](#) where fraudulent practice is suspected or uncovered and disclose any interests that might impact their decision-making or the advice that they give to NCC. We expect suppliers to act honestly, fairly, and openly, and to fully comply with their tax obligations.

7.3 Transparency

NCC seeks to be transparent in our dealings with suppliers, and we expect suppliers to be open and honest in their dealings with us. In addition, where contractually required, we expect full and prompt disclosure of accurate cost, revenue and margin information (Open Book Accounting and Open Book Contract Management) in line with the terms of the contract. Suppliers should expect us to publish agreed key performance indicators and to conduct audits of open book contracts to ensure reporting requirements and any 'payment for results' mechanisms have been fairly implemented.



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7.4 Prompt Payment

NCC expects both itself and suppliers to be fair and reasonable in their payment practices. Suppliers should pay subcontractors within 30 days on NCC UoB contracts and comply with the standards set out in the Prompt Payment Code on all other contracts.

7.5 Corporate Governance and Corporate Social responsibility

We expect our suppliers to adhere to the [UK Corporate Governance Code](#) or follow equivalent good corporate governance principles underpinned by robust processes. We also expect our suppliers to be good corporate citizens by upholding the values of this Supplier Code of Conduct, taking into consideration social value legislation in delivering goods and services and supporting key NCC corporate policy areas such as diversity and inclusion, sustainability, prompt payment, small and medium sized enterprise engagement, the Armed Forces Covenant, apprenticeships and skills development and addressing the gender pay gap.

7.6 Exclusions and Debarment

NCC expects that its supply chain continually meets legislation and ethical behaviour and are not involved in any activity that would be consider illegal or unethical, which could result in prosecution and/or debarment from any publicly accessible lists, such as the central debarment list maintained by the Procurement Review Unit which is part of the Cabinet office.

Should at any time suppliers or its supply chain become aware of a failure to maintain this level then we are to be notified immediately, as per paragraph 6.16 of this Supplier Code of Conduct.

7.7 Export Control & Sanctions

On occasion economic sanctions and export control laws prevent NCC and our supply chain from working with certain entities, persons, specific countries and/or their governments. Sometimes these instructions may be a flow down from a client that are to be cascaded down the supply chain. It is essential that our supply chain comply with applicable sanctions regimes and export control laws and provide the relevant information to us upon request.

8 HOW TO RAISE A CONCERN

NCC expects that its supply chain has adequate reporting system in place to ensure that employees can voice and raise concerns anonymously and without fear of retaliation. NCC expect that all reports are investigated in a fair and timely manner. Suppliers employees are also expected to be



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offered the opportunity to report concerns via any industry recognised helplines, which will be handled in a prompt and professional manner and treated confidentially.

When raising and reporting concerns to the NCC the process in 6.16 should be followed.

9 POLICY REVIEW FREQUENCY

This policy shall be reviewed and appropriately updated on a two-yearly basis.