



QA Group Supplier Code of Conduct

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| V3.4 | Added DEI section and background statement; strengthened workforce, breach reporting, and audit sections, clarified supply-chain flow-down and environmental compliance. |
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Document Approval

| Name | Position | Viewed / comments |
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| Phil Young | QA Group General Counsel | Approved |

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| V3.4 | 26/05/2026 | Tamryn Fischer, Paralegal | Added DEI section and background statement; strengthened workforce, breach reporting, and audit sections, clarified supply-chain flow-down and environmental compliance. |
| V3.3 | 23/10/2025 | Legal Team (various members) | General review and minor edits, new Audit section & updates to 8. Contact section. |
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1. Message from QA's Group General Counsel

The QA Group, including but not limited to QA Limited, QA USA, Inc. and QA Higher Education ("QA" or "QA Group"), is the UK's leading technology talent and training organisation. We are specialists in technology – providing a comprehensive suite of talent and training services helping individuals and companies to be winners in the digital revolution.

As such, we are critically aware of the impact our business and conduct has on our customers, suppliers, employees and wider society, wherever we do business.

We take great pride in our efforts to maintain high standards of corporate conduct, ethical behaviour and compliance with laws and regulations – our mutual success depends upon these actions because we believe the decisions we make as a business have a lasting impact beyond the QA Group.

Consequently, our Supplier Code of Conduct ("**Code**") sets out the practices, processes and behaviours that we expect our suppliers to be compliant with, reflective of our commitment to deliver long term customer satisfaction by taking responsibility to ensure our supply chain operates responsibly and ethically.

We take compliance with this Code seriously and want to work with likeminded companies. As such, it is critical that our suppliers support and adhere to this Code, with the aim of being regarded as partners to our business and mission.

Together, we look forward to your commitment with us to long-term social, ethical, environmental and economic sustainability, creating an environment where our customers thrive and where all of us our winners in the digital revolution.

Thank you.

2. Purpose

The purpose of this Code is to:

1. Share the QA Group's vision and values with its suppliers and business partners (collectively, **Suppliers**);
2. outline to Suppliers the requirements expected of them in providing goods or services to the QA Group; and
3. establish and maintain appropriate relationship standards between QA Group and its Suppliers that ensures, amongst other items, that its Suppliers operate ethically, are environmentally responsible and their workforce is compliant with relevant labour practices and standards.

The Code does not set out an exhaustive list of the QA Group's expectations but rather outlines the required minimum standards to do business with the QA Group.

The QA Group are responsible businesses, and we expect our Suppliers to partner with us in this mission, committing themselves to the highest standards of ethical conduct, sustainability and practice. Our Suppliers are an essential partner in delivering on our commitments and standards. The impact our learning has on society is vast and so we expect our Suppliers to

partner with us in this mission, committing themselves to the highest standards of ethical conduct, sustainability and practice.

3. Background

At the QA Group we help our clients and learners win in the digital revolution. Through our unique combination of world-class digital and live skills development capabilities we deliver proven workplace outcomes. We are technology and digital specialists – providing a comprehensive suite of talent and training services which support businesses and government organisations to tackle the global skills shortage.

We are committed to encouraging equality, diversity and inclusion and to eliminating unlawful discrimination in our supply chain. We believe diverse and inclusive practices are fundamental to responsible business and help create respectful learning and working environments for everyone involved in delivering services to our clients and learners.

We offer a broad range of courses and wider training services across multiple subject areas – including but not limited to Artificial Intelligence, Cyber Security, DevOps, Cloud Computing, Project Management and Data Analytics – to help businesses to develop and grow technology and management talent within their organisation.

Our learning platform, provides clients with a global solution to (i) developing skills across a range of essential cloud technologies; and (ii) help their teams understand how technology is changing the relationship between businesses and their customers.

Our Higher Education business complements our corporate products and services. Working in partnership with Universities in the UK to recruit, market and deliver a range of programmes to international and domestic students from foundation level to undergraduate and postgraduate degrees.

Ultimately the QA Group’s vision is to help our clients, learners and students to win in the digital revolution.

- We are professionals for the digital age - we are professionals who take pride in knowing our stuff – we aim to be thought leaders in our areas of expertise and share a drive for self-development. We take full responsibility in delivering results for our clients, students, learners and colleagues. We value the diversity of our people and celebrate our differences.
- We win together in partnership - we are committed to high performance through coaching and development. We prefer to collaborate and win together as a team rather than as individuals. We are passionate about what we do, and we make a difference to our clients, students, learners and colleagues in the digital age.

It is this QA Spirit that drives us and makes us want to partner responsibly with Suppliers who uphold and are committed to similar virtues.

4. Basis and Application of the Code

The UN Global Compact forms the basis of this Code (“**the Compact**”). The Compact leads the effort to improve an organisations’ supply chain sustainability performance and bases its work

on ten principles which are drawn from certain international declarations such as the Universal Declaration of Human Rights, the International Labour Organisation's (ILO) and the UN Convention against Corruption. The Compact promotes universal human rights, labour, environmental and anti-corruption standards within the global business community.

As such, the Code is based on certain principles from the Compact. It applies to all Suppliers who supply products or services to the QA Group. The Code is broken down into what we regard are the most material subject matter areas where we require compliance from our Suppliers. We require our Suppliers to:

1. conduct their operations in a legal, environmental, social and ethically responsible manner with respect to these subject matter areas;
2. be responsible for managing their own risks;
3. cascade these principles to their own suppliers in order to ensure compliance across QA's supply chain; and
4. ensure that their employees, workers, agents and subcontractors involved in providing goods or services to QA comply with this Code.

5. Requirements of Suppliers

5.1. Diversity, Equality and Inclusion

- Suppliers must promote equality, diversity and inclusion in their workforce and in the delivery of services to QA and/or QA's customers and must not unlawfully discriminate against any person on the basis of a protected characteristic under the Equality Act 2010 (or equivalent applicable legislation in the jurisdictions in which they operate).
- Suppliers must maintain a working environment that is inclusive and respectful and free from bullying, harassment and victimisation.
- Suppliers must maintain appropriate policies, training and reporting processes to prevent and address discrimination, bullying, harassment and victimisation, and must take seriously and appropriately investigate any complaints arising in connection with services provided to QA.

5.2. Employment and Workforce

- Suppliers must ensure that employment within their business is freely chosen.
- Suppliers must ensure that their workers have freedom of association.
- Suppliers must ensure a safe and hygienic working environment is provided.
- Suppliers must ensure their workplaces are maintained such that they are free from violence, harassment, intimidation and other unsafe or disruptive conditions.
- Suppliers must ensure that appropriate security safeguards for employees and workers will be provided as required and maintained with due regard for privacy and dignity.

- Suppliers must ensure that child labour shall not be used.
- Suppliers must not use forced, bonded or trafficked labour and must have controls in place to prevent modern slavery and human trafficking within their operations and supply chain.
- Suppliers must ensure that no discrimination is practiced.
- Suppliers must ensure that every employee or worker is entitled to compensation for regular work in the ordinary course.
- Suppliers must ensure they comply with all applicable laws regarding human rights and employment, in the relevant jurisdictions in which they work.
- Suppliers must have robust means of ensuring that any subcontractors in their supply chains also comply with relevant employee and workforce regulations and laws, including but not limited to, complying with the provisions of the Modern Slavery Act 2015.
- Suppliers must not tolerate harassment or victimisation in the workplace.

5.3. Data Protection and Privacy

- Suppliers must respect and protect the rights of all individuals who entrust QA with their personal information.
- Suppliers should not use or disclose any information regarding QA, our existing or prospective clients, learners, suppliers or other third parties, except as authorised by QA.
- Suppliers must keep personal information safe and secure while also requiring there to be systems, processes and expert staff devoted to implementing such security controls and safeguarding personal data across their business.
- Suppliers must ensure compliance with all applicable data and privacy legislation.
- Suppliers must ensure that individuals are able to exercise their rights in connection with their personal information.
- Suppliers must only transfer personal information across international borders in accordance with applicable law and with our express written permission.
- Suppliers must cooperate with QA's reasonable requests to assist in carrying out data protection and transfer impact assessments.
- Suppliers must only share personal information once you have QA's express written permission.
- Suppliers must ensure they have robust processes in place to safeguard the integrity and security of their systems and comply with relevant government standards and guidelines.

5.4. Health and Safety

- Supplier must have respect of health & safety in delivering services to QA and/or our clients whether on QA premises, Client premises or a Supplier's own premises.
- Suppliers must ensure the health and safety risks with respect to their supply to QA, its clients, learners, students, other suppliers and third parties, are minimised and mitigated.

- Suppliers must ensure that they provide their employees and workers with health and safety law guidance and training follow good industry practice.
- Suppliers must ensure that the safety of employees, workers and the public is a mutual priority.

5.5. Information Technology

- Suppliers must ensure the integrity and security of their IT systems and comply with relevant government standards and guidance.
- Suppliers must inform QA immediately if they become aware of any cyber security incident that affects, or has the potential to affect, QA or QA client, learner or student data.
- Suppliers must ensure that all IT systems that interact with the QA estate are free from malware, virus and any other form of defect.

5.6. Intellectual Property and Confidential Information

- Suppliers must ensure strict compliance with confidentiality provisions in any contract with QA.
- Suppliers must respect the intellectual property rights of others and respect QA's intellectual property rights in its services, content and products.
- Suppliers are not permitted to use, in whole or in part, QA's intellectual property except with express written permission to do so.
- Suppliers must protect QA's confidential information by not transferring, publishing, using or disclosing it without QA's express written permission to do so.

5.7. Financial Integrity, Anti Bribery and Corruption, Gifts and Hospitality

- Suppliers must accurately be able to account for all transactions and payment flows from QA.
- Suppliers must always ratify and seek written confirmation of the authority of the individual at QA who is proposing to enter a contract with the Supplier.
- Suppliers are expected to use their best endeavours to cooperate with any request for documents, confirmation and/or information made in connection with QA's Supplier on-boarding process, including but not limited to, through One-Trust, an external third-party verification platform and provider.
- Suppliers must ensure that there is no risk of bribery or corruption within their personnel or supply chains.
- Suppliers must comply with all applicable anti-bribery and anti-corruption law, including but not limited to the Bribery Act 2010.
- Suppliers must not give or offer any payment, gift, hospitality or other benefit in the expectation that a business advantage will be received, or to reward any business received nor accept any offer from a third party that you know, or suspect is made

with the expectation that we will provide a business advantage for them or anyone else.

- Suppliers must put in place appropriate processes and controls to ensure that all forms of illegal or inappropriate activity, including, but not limited to, bribery, corruption, fraud, tax evasion, misrepresentation and anti-competitive conduct are strictly prohibited.

5.8. Business Continuity

- Suppliers must maintain adequate procedures, policies, and infrastructure to ensure continuity of supply to QA, its clients, learners and students.
- Suppliers must be able to provide evidence on demand of resilience and continuity of supply in the form of business continuity or disaster recovery plans, as part of due diligence exercises.

5.9. Environmental (Sustainability/ Carbon Net Zero)

- Suppliers must be committed to achieving Net Zero in line with the UK Government's 2050 net zero target and strive to accelerate this timeframe within their own organisations and supply chain.
- Suppliers must have documented evidence to demonstrate strong sustainability practices that preserve natural resources.
- Suppliers must comply with all applicable environmental laws (including the Environmental Management and Protection Act 2010) and regulations and support QA in complying with its legal and contractual obligations to procure sustainably and ethically.

5.10. Conflict of Interest

- Supplier must not hold a vested interest in QA and equally, we expect QA suppliers to mitigate appropriately against any real or perceived conflict of interest through their work with us.
- Suppliers must report immediately to QA any position of influence gained through a contract that could unfairly disadvantage any other supplier or reduce the potential of fair or future competition.
- Suppliers must inform QA should a member of the Supplier's staff, investor, affiliate or family member, have a relationship with a QA employee who can make decisions which may affect the Supplier's business. If a conflict or perceived conflict arises outside the initial due diligence or renewal process, the supplier must immediately disclose this conflict to QA.
- Suppliers must not attempt in whole or in part to procure commercially sensitive or confidential information from any source and disclose that to QA where to do so would be in breach of any law, regulation or good industry practice.

5.11. Implementation of Requirements and Continuous Improvement

- Suppliers must promptly respond when QA undertakes due diligence assessments and risk reviews on our new and existing suppliers, including data privacy, information security, finance and cloud services, whether or not as part of the contract lifecycle with the Supplier.
- Suppliers must be transparent, open and honest when responding to any information request from QA so QA can make an informed decision on the provisions of a Supplier's services or goods.

5.12. Artificial Intelligence

- Suppliers must ensure that any use of Artificial Intelligence ('AI') within their services offered to QA comply with applicable law, regulation, guidance and global best practice.
- Suppliers are not permitted to use, in whole or in part, QA's intellectual property within AI except with express written permission to do so.

6. Reporting Concerns and Compliance

Suppliers must promptly report to QA any actual or suspected breach of this Code, applicable law, or other unlawful, unethical or improper conduct connected with services provided to QA, including fraud, bribery, corruption, modern slavery or other misconduct. Reports should be made within five (5) working days, or such shorter period as required by law, regulation or contract.

Suppliers must also:

- enable relevant individuals involved in delivering services to QA, including employees, workers, contractors and subcontractors, to raise concerns in good faith;
- provide appropriate channels for raising concerns and, where practicable and lawful, allow concerns to be raised confidentially or anonymously;
- not retaliate, and not permit retaliation, victimisation or detrimental treatment against any individual who raises a concern or participates in an investigation in good faith; and
- cooperate with any reasonable review, audit or investigation conducted by QA or on QA's behalf.

Suppliers should ensure that relevant personnel are aware of available reporting channels and understand how concerns can be raised.

7. Audit

To ensure compliance with this Code, the QA Group reserves the right to conduct audits, assessments, or site visits of the Supplier's facilities and operations, either directly or through

an appointed independent third party. These audits may include the review of relevant records, policies, and procedures. The Supplier agrees to cooperate fully with such audits and provide access to all reasonably necessary documentation and personnel. Suppliers must maintain appropriate records to demonstrate compliance with this Code and provide reasonable evidence on request. Where non-compliance is identified, Suppliers must implement corrective actions within agreed timeframes and provide updates and evidence of closure on request. Failure to address any non-compliance identified may result in re-audits or in serious cases, suspension or termination of the business relationship.

8. Contact and Reporting

The QA Group are committed to fostering ethical, responsible, and sustainable practices across our entire supply chain. We expect all our Suppliers to share this commitment by upholding the principles set out in this Code. By working together with integrity and accountability, we can drive positive outcomes for our people, our partners, and our communities. We appreciate your cooperation and ongoing commitment to meeting these standards.

For further information, queries about this Code, or to report any concern under [Section 6](#), please contact: procurementservices@qa.com. Reports will be handled appropriately and, where possible, sensitively and confidentially.

