



SUPPLIER CODE OF CONDUCT

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1. Introduction

CACI Limited was incorporated in 1982 and is a wholly-owned subsidiary ultimately owned by CACI International Inc. Our Marketing Solutions Division and Information Management Solutions Division offer an unrivalled range of data and marketing solutions and information management solutions to local and central government and to businesses from most industry sectors. Our supply chain consists of over 500 diverse suppliers, for example, large multi-national hardware, software and/or data suppliers, professional services providers, utilities providers and facilities contractors.

Corporate integrity, sustainable supplier relationships and supply chain transparency are of paramount importance to CACI. These core principles are reflected in this Supplier Code of Conduct (“Code”) the purpose of which is to establish the minimum standards that must be met by any entity that supplies goods, services, data and/or technology to CACI.

2. What we expect of suppliers

- All CACI suppliers must (and must ensure that suppliers in their supply chain):
 - Comply with the principles in this Code (as updated from time to time)
 - Put in place appropriate systems and policies to ensure continuous compliance
 - Provide annual training to staff on the principles covered by this Code
 - When requested by CACI, demonstrate their compliance with this Code.

Any failure by a supplier to comply with this Code may allow CACI to suspend or terminate its relationship with that supplier.

Any references below to laws should be read as references to laws in the supplier’s own jurisdiction and, if there is no relevant law, suppliers should comply with the principles in this Code.

3. Principles

3.1. Bribery and Corruption

CACI has a zero-tolerance approach towards bribery and corruption in its business dealings with potential customers, suppliers and business partners. Under no circumstances will CACI tolerate or approve of any CACI staff or suppliers’ staff offering or accepting a bribe in order to gain a business or other advantage. In addition, as a basic principle, any gifts or hospitality that CACI (or suppliers) offers or receives must be reasonable and proportionate.

- Suppliers must:
 - Comply with the Bribery Act 2010 and all other applicable laws and regulations relating to the prevention of bribery and corruption
 - Have policies and procedures in place to ensure compliance with these laws, including for example measures to cover issues such as gifts and hospitality
 - Not accept, offer, promise, pay, permit or authorise:
 - Bribes, facilitation payments, kickbacks or illegal political contributions

- Money, goods, services, entertainment, employment, contracts or other things of value, in order to obtain or retain improper advantage
- Any other unlawful or improper payments or benefits
- Ensure that any corporate gifts and hospitality (including entertainment) comply with their internal policies and procedures (including any financial limits or approvals system) and applicable law
- Carry out risk assessments and document the results.

3.2. Conflicts of Interest

Conflicts of interest typically arise when personal interests interfere with or influence a person's ability to make decisions on behalf of the business they work for or its customers. For example, a conflict of interest may exist where a supplier member of staff is involved in an activity in which they stand to gain personally or have an interest that conflicts with the interests of the supplier. This could include, for example, that member of staff hiring members of their family or relatives, or being involved in the purchase or supply of goods/services that the supplier is considering where that member of staff has some personal relationship or connection with the party that the supplier is involved with.

➤ Suppliers must:

- Not act in a manner which creates or maintains any potential or actual conflict of interest
- Ensure that staff are aware of the implications of conflicts of interest and comply with their internal policies and applicable law
- Promptly report any conflicts of interest that affect CACI, both internally (via their internal reporting lines) and to their CACI business contact.

3.3. Tax Evasion

CACI's policy is to conduct all of its business in an honest and ethical manner. We take a zero-tolerance approach to tax evasion and its facilitation in all our business dealings, whether under UK law or the law of any foreign country. Under no circumstances will CACI tolerate or approve of any CACI staff facilitating tax evasion for a client, supplier, business partner or otherwise.

Tax evasion is defined differently in different jurisdictions. It includes, for example:

- Deliberately and dishonestly not paying taxes which are due in the UK
- Evading tax in a foreign country (provided the conduct is an offence in that country and would be a criminal offence if committed in the UK).

Facilitation of tax evasion typically involves:

- Being knowingly involved in the fraudulent evasion of tax
- Assisting or encouraging another person to commit fraudulent evasion of tax.

Facilitation of tax evasion can arise both in relation to UK tax or tax in a foreign country.

➤ Suppliers must:

- Not be involved in tax evasion or encourage tax evasion in the UK or abroad, whether by customers, suppliers, contractors or business partners

- Not do business with companies they know or suspect are involved in tax evasion or facilitation of tax evasion
- Ensure that supplier staff have an understanding of tax evasion and facilitation of tax evasion
- Promptly report any suspected tax evasion or facilitation of tax evasion, both internally (via their internal reporting lines) and to their CACI business contact.

3.4. Modern Slavery

CACI has a zero-tolerance approach to modern slavery, child labour and the employment of minors. We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners.

➤ Suppliers must:

- Comply with applicable laws relating to the prevention of modern slavery, for example, the Modern Slavery Act 2015 (including filing a Modern Slavery Statement where necessary)
- Comply with applicable laws relating to human trafficking practices and the employment of minors
- Ensure that suppliers in any part of their supply chain comply with the principles in this section 3.4
- Where necessary, carry out annual risk assessments and document the results.

3.5. Diversity and Equality

CACI is committed to providing a working environment that is respectful of workers' rights and freedoms. This includes encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination.

➤ Suppliers must:

- Comply with applicable employment laws (for example, relating to the minimum wage and benefits established by law)
- Respect workers' rights to lawfully associate with groups of their choice, join trade unions and engage in collective bargaining
- Not violate the Equality Act 2010 (or other applicable law) by unlawfully discriminating based on any protected characteristic
- Avoid all other forms of unlawful discrimination (for example, relating to pay, benefits, terms and conditions of employment, promotion, etc.)
- Create a working environment free of bullying, harassment and victimisation, which promotes dignity and respect for all.

3.6. Data Protection and Confidentiality

CACI is unambiguously committed to complying with data protection law, specifically the UK GDPR (the UK's version of the EU General Data Protection Regulation 2016) and the Data Protection Act 2018.

CACI and its suppliers have a responsibility to ensure that the personal data they deal with is lawfully collected, used and protected. CACI has a zero-tolerance approach to data breaches and we expect our suppliers to adopt the same approach.

In addition, any confidential information relating to any business (including CACI) and/or its customers, suppliers and business partners needs to be suitably protected and handled responsibly. Therefore any information (including commercial, pricing and technical information) that suppliers receive through their dealings with CACI must be kept confidential.

CACI may ask suppliers to sign appropriate non-disclosure and/or data processing agreements in order to formalise their obligations in these areas.

➤ Suppliers must:

- Comply with all applicable data protection laws and requirements (for example, the UK GDPR) when collecting, supplying, processing and/or accessing any personal data
- Where necessary, carry out risk assessments (such as Data Protection Impact Assessments) and document the results
- Have in place appropriate measures to:
 - Protect the integrity and confidentiality of information belonging to or supplied by CACI (and other organisations) held on their systems
 - Ensure there is no unauthorised access of said information by third parties, including a supplier's suppliers, vendors, agents and contractors.

3.7. Health, Safety and the Environment

CACI is committed to protecting the health and safety of its employees, contractors and any visitors to its sites. In addition, CACI operates in a sustainable and ethical environment and strives for the best possible environmental practices, for example promoting the recycling and minimisation of waste in all areas.

➤ Suppliers must:

- Comply with applicable environmental laws, including those relating to waste disposal, emissions, discharges and the handling of hazardous and toxic material
- Provide a safe and healthy working environment which complies with applicable health and safety laws
- Implement relevant industry-specific procedures and safeguards to prevent workplace hazards and work-related accidents and injuries or, alternatively, provide workers with appropriate personal protective equipment
- Ensure that any goods and packaging they manufacture or use comply with applicable environmental laws
- Where possible, purchase goods/services from suppliers who source supplies in a sustainable manner.

3.8. Trade Restrictions

In some circumstances, trade restrictions such as export controls may apply to the goods, services or technology that suppliers provide to organisations.

- Suppliers must:
 - Comply with applicable trade restrictions (including import and export controls, sanctions and embargoes) imposed by governments in the UK, the EU and the US
 - Ensure that their employees do not buy from, or travel to, countries subject to sanctions or travel restrictions
 - Not work with individuals or companies that appear on UN or other sanctions watchlists
 - Vet suppliers in their supply chain to ensure they comply with applicable trade restrictions.

3.9. Competition Laws

Competition laws exist in most countries where CACI, its suppliers and customers operate. Accordingly, CACI suppliers are expected to conduct business in accordance with all applicable antitrust or competition laws and regulations.

- Suppliers must:
 - Avoid business practices such as entering into arrangements that unlawfully restrain competition
 - Not engage in improper exchange of competitive information
 - Not engage in price fixing, bid rigging, boycotting of third parties or improper market and/or customer allocation.

4. Updates to this Code

CACI will update this Code from time to time, for example to reflect changes in the law. CACI will make any updated versions of this Code available on its [website](#). It is the responsibility of suppliers to ensure they comply with the latest version of this Code.