

# Supplier Code of Conduct

Version 1.1

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# 1. Foreword

Thank you for being an important supplier to Digital Catapult enabling us to drive innovation in advanced digital technologies.

We are pleased to launch our first edition of the Supplier Code of Conduct in June 2024, highlighting the principles and values that are important to Digital Catapult and should be followed by our suppliers. We continue to recognise our reliance on our suppliers to implement critical services across the industry. With this in mind, we continue to emphasise how important it is that our current and potential future suppliers understand, and align with, the behaviours and standards we expect from anyone working in, or with, Digital Catapult.

Since our formation in 2013, Digital Catapult has consistently signposted areas of opportunity offered by new technologies and created strategic programmes and facilities to enable UK companies to be successful early adopters. Over the last 5 years alone, we have helped 174 startups to raise £555 million, engaged with nearly 3,000 companies, and delivered 303 projects and programmes. Therefore, the public expects Digital Catapult and our suppliers to deliver in their interests, fulfil any promises made, behave ethically, and treat end-users, employees, and subcontractors fairly and with respect. Suppliers expect us to be fair and transparent in all dealings with them.

This Supplier Code of Conduct outlines the standards and behaviours expected of suppliers and their staff when working on Digital Catapult contracts. We expect suppliers to act in a manner that is compatible with public service values, promotes innovation and expertise, and that increases opportunities for startups and small- and medium-sized enterprises. We expect all suppliers to meet these commitments continuously and ensure that their employees, partners, and subcontractors do the same. If any party fails to meet these commitments, we will review and take the appropriate action.

This document also allows future potential suppliers to understand what is expected of them if they are seeking to work with Digital Catapult. When selecting suppliers, we undertake compliance checks to ensure that we are contracting with reputable bodies. These checks are conducted in line with [procurement regulations](#) and our internal policies, to guarantee fair access to opportunities for suppliers and equal treatment during procurement processes.

This document is intended to complement our contracts with suppliers and the rules we set out when we procure our goods and services, which will always take precedence.

We expect our suppliers to communicate this Supplier Code of Conduct to their employees, parent company, subsidiaries, and subcontractors. Likewise, we will communicate it to our employees.



**Susan Bowen**  
CEO, Digital Catapult

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## 2. About Us

Digital Catapult is the UK authority on advanced digital technology. Through collaboration and innovation, we accelerate industry adoption to drive growth and opportunity across the economy.

We bring together an expert and enterprising community of researchers, startups, scaleups and industry leaders to discover new ways to solve the big challenges limiting the UK's future potential. Through our specialist programmes and experimental facilities, we make sure that innovation thrives and the right solutions make it to the real world.

Our goal is to accelerate new possibilities in everything we do and for every business we partner with on the journey – breaking down barriers, de-risking innovation, opening up markets and responsibly shaping the products, services and experiences of the future.

Digital Catapult is part of the Catapult Network that supports businesses in transforming great ideas into valuable products and services. We are a network of world-leading technology and innovation centres established by Innovate UK.

Our team's deep tech expertise, specialist knowledge, and experience in applying and combining advanced digital technologies is helping to deliver transformational solutions for UK industry.

# 3. Our Organisational Values

We believe in our values and deliver them in our business culture for employees and partners. We're ambitious about the growth of the UK economy. Curious about how the application of advanced digital technologies can create new business opportunities. Open to innovate and collaborative ways of working with organisations and businesses of all sizes. Optimistic that disruption can turn into advantage and new opportunities.



**Ambition**

What are you capable of; what are we capable of together?

We value people who are ambitious for their own career and personal development, for the advancement of our technologies and for the organisations, start-ups and corporates alike, with whom we partner.



**Openness**

We believe true inspiration comes from openness and collaboration. Our bright and creative team of experts is called upon to work on big challenges, across multiple projects and with many different internal and external stakeholders. We require our people to be open and ready to take on new challenges. We equally recognise that our team will only continue to develop and thrive if we continuously promote and embrace diversity and inclusion in all that we do.



**Optimism**

Whether it's unlocking the potential of the technologies we work with, or your own personal potential, we adopt an optimistic approach to the challenges we take on and always strive to make a positive impact.



**Curiosity**

Working at the forefront of advanced digital technology often means taking a leap of faith. Ambiguity is part of our world and we work together to make sense of it. We value those people who are truly curious, who will take risks and will push the boundaries to see what's possible for themselves and the technologies we are engaged with, as well as for those organisations with whom we work.

## 4. Compliance

The Supplier Code of Conduct is intended to set out the way in which Digital Catapult and our suppliers will behave towards each other and with the supply chain. It is not intended to be legally enforceable in isolation, 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, works and services, which at all times shall take precedence. Digital Catapult Terms and Conditions include requirements on suppliers to comply with our policies which includes the Supplier Code of Conduct and compliance will be managed in line with contractual terms.

For the avoidance of 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.

All departments within Digital Catapult and suppliers who provide goods and services to those departments are expected to comply with all aspects of this Supplier Code of Conduct.

All 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 departments 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 Digital Catapult's [Procurement](#) department.

## 5. Value for Money

Through our contracts awarded using public money, the public expects Digital Catapult to get value for every pound spent and to be able to show that long-term value is being achieved. This means that contracts should be priced to offer sustainable value throughout their life, including when changes are needed.

We accept that our suppliers need to make a fair profit in return for any risks they are accepting and the commitments and investments they make to be able to deliver services for us. We do not expect suppliers to exploit an incumbent or monopoly position, an urgent situation or a disparity of capability or information to overprice.

We will engage constructively with suppliers about any required changes; we expect suppliers to do the same. We expect them to work in good faith to resolve any disputes promptly and fairly during the life of a contract. They should do this through good relationship management and, where appropriate, contractual dispute resolution mechanisms, recognising that protracted litigation rarely serves the best interests of any party.

We will seek to award contracts based on the 'Most Economically Advantageous Tender' response. We will measure supplier performance on relevant and proportionate indicators and apply proportionate contractual remedies for non-compliance.

# 6. Ethical Behaviour, Professional Behaviour & Whistleblowing

## Ethical Behaviour

We expect 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 require of executives, directors, employees, partners, and subcontractors and to have governance and processes to monitor adherence to these standards.

## Professional Behaviour

We will work professionally, constructively and collaboratively with our suppliers. We expect suppliers to be prepared to invest in their relationships with Digital Catapult and establish trust with our staff and with other suppliers involved in delivery. We also expect suppliers to be able to speak out when staff or other suppliers are not upholding the values embedded in this Supplier Code of Conduct. We also expect suppliers to speak out, without fear of consequences, when a project or service is unlikely to succeed because of our behaviours or a lack of good governance. We expect the same behaviour when a contract is no longer fit for purpose, e.g. in its contractual stipulations or measures.

## Whistleblowing

Suppliers, their partners and subcontractors are expected to have in place appropriate whistleblowing arrangements. We will work with our supply chain to ensure that concerns raised about matters covered through whistleblowing arrangements are properly recorded and investigated, and that appropriate actions are then taken.

## 7. Equality, Diversity & Inclusion

Equality, Diversity & Inclusion (EDI) is a priority for Digital Catapult and we focus on fostering a culture of engagement, inclusivity, recognition and continuous improvement through our employee interest groups (such as our Employee Voice Network and Inclusion Champions) engagement surveys such as Great Places to work and annual EDI survey, feedback mechanisms and recognition programs.

We recognise and value the advantage of people coming from diverse backgrounds, where an inclusive and open culture can lead to more innovation and greater agility, accelerating technology and growing the UK economy in an equitable way. This is why it's our ambition to build an organisation that is fully representative and reflective of UK society. We believe EDI are key to creating an enjoyable and positive company culture, where people feel they belong and do their best work, which ultimately drives the success of our business and of others we work with.

We expect our suppliers to demonstrate their commitment to EDI by complying with the Equality Act 2010 and all other relevant legislation. It is expected that our suppliers also implement policies and approaches covering the importance of EDI, including the prevention of discrimination, harassment and bullying.

We are aware that in dynamic workforces, addressing the issue of gender pay inequality is not only a matter of social justice, but also critical for fostering inclusive and equitable workplaces. Therefore, we produce a comprehensive [gender pay gap report](#) that delves into the complex factors contributing to pay disparities between genders within our organisation. Our suppliers should embed similar practices to promote fairness and equality in compensation across their organisation.

## 8. Skills & Training and Living Wage

### Skills & Training

Our ambition is to be an inclusive learning organisation where we continue to build our capabilities, skills and drive a culture of continuous development and growth. In 2023, we renewed our commitment to investing in skills development. By the end of 2023, around 5% of our team pursued apprenticeships at either higher or degree level. Additionally, we have been building our partnership with Ada, the National College for Technical Skills, offering work experience placements and mentoring opportunities, and we are excited to engage with the College and its highly talented students. In 2023, Digital Catapult was certified as a Great Place to Work and listed amongst the Best Places to Work in Tech 2023.

We expect our suppliers to support our approach in developing the workforce of the future by focusing on formal training programmes targeted in areas considered to be in short supply. We also have work experience, internship and apprenticeship programmes as part of our early careers programme. Additionally, we continue to explore other new initiatives that we can champion, which support communities local to our office locations in terms of supporting social mobility.



## Living Wage

We are proud to be an accredited Living Wage employer, joining around 14,000 other organisations that have made the pledge to pay all employees and third-party employees a wage that will support the cost of living today where the national minimum wage does not.

We expect our suppliers to pay the real living wages, i.e. wages that are always enough to meet the costs of living.

# 9. Modern Slavery, Human Rights & Employment Law

Digital Catapult and suppliers must both comply with all applicable human rights and employment laws in the jurisdictions in which they work. 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. This must also include not supporting or engaging in any forced labour or child labour.

# 10. Health & Safety

We are committed to providing a safe and healthy working environment for all employees, visitors, and contractors. We expect all suppliers to co-operate with us in achieving this goal and to comply with our Health & Safety Policy, health and safety legislation and associated guidance.

Suppliers must ensure that their employees and contractors are properly trained, equipped and competent. They must provide the necessary information, instruction, training, equipment and supervision to secure their health and safety at work, and the health and safety of others who may be affected by their actions. Suppliers are expected to work with us to ensure that they follow health and safety procedures and report near misses and incidents accordingly.

When appropriate, suppliers may be required to participate in investigations and root cause analysis. We expect suppliers to take preventative actions to avoid incidents that may cause injury to persons or damage to premises. We expect suppliers to ensure that they take those actions and monitor activities to ensure that their actions are to agreed standards.

# 11. Environmental Responsibility & Sustainability

We are supporting the UK Government's ambition for a more sustainable future, and its commitment to enshrine a net-zero emissions target by 2050. With advanced digital technologies playing a major role in enabling sustainability, our approach to sustainability supports organisations in three key areas:

## 1. Enabling a twin transition

Success over the next 20 years will be defined by a company's ability to transition to both a digital and sustainable economy. This twin transition is already creating new opportunities for organisations and supporting growth. We support three enablers of this twin transition:

- Circular economy
- Energy efficiency and security
- Decarbonised supply chains

## 2. Building a UK centric digital clean technology ecosystem

We support early stage technology companies through our FutureScope programme, supporting them in understanding environmental, social, and governance (ESG) investment criteria, and solving industrial sustainability challenges.

## 3. Making digital technology sustainable by design

Advanced Digital Technologies account for around 2% of global greenhouse gas (GHG) emissions. We are supporting the design and implementation of low emission technologies.

We expect our suppliers to work with us to seek and implement environmentally sound practices. Our suppliers should also be aware of, and support us in complying with all relevant environmental legislation and to work with us to achieve our sustainability objectives.

Our suppliers should help us understand and reduce supply chain impacts. In the supply of goods and services, our suppliers should aim to:

- reduce their impact on climate change and biodiversity
- reduce waste and follow the waste hierarchy
- reduce the use of finite resources
- reduce and, where possible, eliminate the use of harmful products
- prevent and control pollution
- promote energy efficiency and the use of renewable energy

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- build greater resilience, traceability, and sustainability in their supply chains

We expect our suppliers to help us to report accurately on product or service use. Suppliers should strive for continuous improvement by continually assessing their environmental impacts.

## 12. Social Value

Under the Public Services (Social Value) Act 2012, we consider how the services we procure improve the economic, social, and environmental wellbeing of the UK for relevant contracts. To support this, Digital Catapult will include appropriate social value evaluation criteria as part of the procurement process for relevant contracts.

## 13. Corporate Social Responsibility

We expect our suppliers to adhere to good corporate social responsibility principles underpinned by robust processes. We also expect our suppliers to uphold the values of this Supplier Code of Conduct, taking into consideration social value legislation in delivering goods and services.

## 14. Reputation, References & Marketing

We want to work with suppliers who are proud of their reputation for fair dealing and quality delivery. We also want to work with us to enhance the supplier's reputation. We expect all parties to be conscious of the need to maintain public trust. They should ensure that neither they, nor any of their partners or subcontractors, bring Digital Catapult into disrepute by engaging in any act or omission which is reasonably likely to diminish the public's trust in us. We expect suppliers to notify us within one business day of any situation which could be damaging to their or our reputations. This is not intended to limit any supplier's legal obligations, their ability to fairly criticise us or our policies or to constrain whistleblowing.

As we are the UK authority on advanced digital technology, Digital Catapult is often considered as a valuable referee.

If a supplier is currently providing goods or services, they may include our name in their list of clients on their website or in written marketing material, provided they first get our permission in writing. Our name, "Digital Catapult" should always be used in full, and should not be altered or abbreviated. Any description of the goods

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or services provided should be generic and factual only. If a supplier wishes to say more than this or issue a press release, the request must be referred to our [Marketing & Communications](#) department for prior approval.

If a supplier would like to put Digital Catapult forward as a referee to prospective clients, they must first get permission in writing; such requests should be referred to our [Procurement](#) department for approval. References will only ever be factual, will not include any commercially sensitive information and should in no way be construed as promoting or endorsing the supplier.

Under no circumstances may suppliers use Digital Catapult logos for any purpose, other than as prior authorised in writing by our [Marketing & Communications](#) department. Digital Catapult reserves the right to review a request to use Digital Catapult logos, and may in its absolute discretion reject or accept the request.

## 15. Social Media

Social media is now an integral part of our society. It enables us to convey messages and opinions to a wide audience instantaneously. The messages suppliers convey become permanent public statements reflecting upon their business, their clients, and customers.

If a supplier's social media activity is linked in any way, or could be deemed to be related to Digital Catapult by our clients, key stakeholders or others, Digital Catapult has a legitimate interest in what is in the content being published, whether this is posted through a business or personal account. Suppliers must adhere to their contractual requirements in delivering goods, works and services for and on behalf of Digital Catapult. Therefore, we expect suppliers to use social media in a responsible, reasonable, and respectful manner and ensure any comments they make align with the ethical values of Digital Catapult as stated in their contract and this Supplier Code of Conduct.

Under no circumstances may suppliers create new social media channels using Digital Catapult's brand without receiving prior permission in writing from our [Marketing & Communications](#) department.

## 16. Counter Fraud & Corruption

We require that suppliers adhere to anti-corruption laws, including but not limited to the Bribery Act 2010, those listed in regulation 57 of the [Public Contract Regulations 2015](#), 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. In providing goods, works or services to Digital Catapult, suppliers should immediately notify us where fraudulent practice is suspected or uncovered and disclose any interests that might impact their decision-making or the advice that they give to us. We expect suppliers to act honestly, fairly, and openly, and to fully comply with their tax obligations.

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## 17. Prompt Payment

We expect both Digital Catapult and suppliers to be fair and reasonable in their payment practices. As a minimum, suppliers should pay subcontractors within 30 days on Digital Catapult contracts, upon receipt of valid invoices, and comply with the standards set out in the Government's [Prompt Payment policy](#) on all other contracts.

## 18. Fair Treatment of Supply Chain

We expect suppliers to deal fairly with the subcontractors and suppliers in their supply chain. We expect suppliers to avoid passing down unreasonable levels of risk to subcontractors who cannot reasonably be expected to manage or carry these risks. We expect suppliers not to create barriers to the use of small and medium-sized enterprises who are qualified to provide goods or services, and to encourage innovation in their supply chains to increase the value or quality of supply.

## 19. Data Protection & Cyber Security

### Data Protection

Suppliers must comply with the Processor and Sub-Processor obligations and only process data as per the instructions of the Controller, i.e. Digital Catapult. Suppliers must tell us immediately if they become aware of anything which could affect our ability to keep the personal data of organisations, or employees safe and secure. Suppliers must also ensure that any cross-border transfers (including data in-transit and storage) outside the UK are subject to contractual agreement with Digital Catapult and in line with updated regulatory requirements.

### Cyber Security

Cyber Security is a critical issue for the Digital Catapult and we have robust plans in place to manage incidents. It is essential that suppliers safeguard the integrity and security of their systems and comply with the relevant standards and guidance set out in their contractual terms. Suppliers must inform the Digital Catapult IT Department if they become aware of any cyber security incident or vulnerability that affects or has the potential to affect the protection of Digital Catapult data.

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Suppliers must seek accreditation, where relevant, with a cyber certification scheme (e.g. Cyber Essentials) and have appropriate technical and organisational measures in place to meet the cyber security and privacy standards.

## 20. Records Management

Suppliers must ensure that any information and data processed and or stored on behalf of Digital Catapult adheres to relevant records management policies and standards. These records must be identifiable, retrievable, accessible and usable for as long as they are required for Digital Catapult business purposes.

It is expected that suppliers implement appropriate processes and policies for the disposal of records, and that controls and processes are in place to manage, respond to and report records management incidents to us.

## 21. Management of Risk

Our aim is to ensure that risk is allocated to the party, or partners best able to manage it. To assist us in making that judgement we will, where appropriate, engage with the market to understand its views in order to make informed decisions. We do not expect suppliers or Digital Catapult to be made responsible for managing a risk that is best managed by the other party. 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 Digital Catapult.

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. We require suppliers of critical services to develop resolution plans, deployable in the event of a corporate insolvency to ensure that critical services continue.

## 22. Continuous Improvement

We expect our suppliers to use recognised industry practices e.g. ISO 9001 and competent personnel in the delivery of goods and services to, or on behalf of, Digital Catapult. We also expect suppliers to continuously improve these goods and services and bring innovation, ideas and expertise to help us address our strategic challenges and to support growth and innovation in advanced digital technology. We will endeavour to create the right conditions to allow suppliers to innovate both during the procurement process and the life of a contract and where appropriate we will inform suppliers of our innovation requirements during the procurement process.

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## 23. Confidentiality

Digital Catapult and suppliers are both expected to comply with the provisions in our contracts and any legal requirements to protect commercial and sensitive information. Digital Catapult and suppliers may both also be party to confidential information that is necessary to be effective partners. 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 does not prevent us from disclosing information where we are compelled to do so, for example, by law or parliament, or to comply with the principles stated in Government procurement transparency principles.

## 24. Transparency

We seek to be transparent in our dealings with suppliers and we expect suppliers to be open and honest in their dealings with Digital Catapult and be in full compliance with the [Government procurement transparency principles](#).

## 25. 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, no supplier should create a technical solution that locks in the supplier's own goods or services.

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.

## 26. Further Information

In the event of a supplier requiring further information about the delivery of contracted goods or services to Digital Catapult, please contact your Contract Manager. If you require additional information, please contact our [Procurement](#) department. We expect our suppliers to work with us honestly and openly to investigate complaints made against them or their employees, including notifying Digital Catapult of any complaints that they may affect the service to, or the reputation of, Digital Catapult. We will work with suppliers to understand the circumstances and details of any complaint and, as appropriate, to agree action to rectify a problem and avoid any recurrence.

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