

PwC Responsible Purchasing Policy – July 07 (revised July 08)

PwC seeks excellence in every aspect of its business and is committed to minimise the social, environmental and ethical impacts of its supply chain.

PwC spends approximately £500m annually on the procurement of goods and services and our purchases range from computer equipment and office supplies, to energy and air travel.

Our policy is to seek the purchase of goods and services that minimise negative and enhance positive impacts on the environment and society whilst meeting our business requirements. By incorporating social, environmental and ethical considerations into purchasing decisions we endeavour to make a positive contribution to the environment and society. To this end, we have developed **Operating Principles** that are applicable to both our suppliers and to ourselves. These principles seek to ensure that we and our suppliers act in a responsible manner.

Where it is found that a supplier's conduct is not in accordance with PwC's Responsible Purchasing Policy and Operating Principles, we will seek to engage with that supplier and encourage continuous improvement in their environmental, social and ethical performance.

In support of the Policy and Principles PwC will:

- Assign responsibility for the Responsible Purchasing Policy and the associated Operating Principles to named responsible individual(s) and provide Management Board oversight of both Policy and Principles.
- Allocate funds for the effective direction and implementation of the Policy and Principles, with particular emphasis on encouraging continuous improvement.
- Measure and monitor the application of the Policy and Principles.
- Review and revise the Policy and Principles on an annual basis.
- Conduct an environmental, social and ethical assessment of our key suppliers utilising PwC or external resources as appropriate.

PwC Operating Principles

The PwC Responsible Purchasing Operating Principles sit within our established purchasing practices that ensure an equitable procurement process in line with all applicable laws and regulations. To implement the Responsible Purchasing Policy, PwC will:

- I. Work collaboratively with suppliers to improve environmental, social and ethical standards with the aim of realising continuous improvement in all three areas for both our suppliers and ourselves.
- II. Protect the confidentiality of information entrusted to us.
- III. Recognise the supplier's own standard where they are working to environmental, social and ethical standards similar to those stipulated in the PwC Operating Principles.
- IV. Not require suppliers to realise environmental, social and ethical standards more onerous than our own.
- V. Ensure that all relevant employees are aware of the Responsible Purchasing Policy.
- VI. Ensure that procurement management is responsible for establishing the compliance of key suppliers with the Supplier Operating Principles.
- VII. Seek to exert commercial influence where we are confident that improvements can be made in environmental, social or ethical performance of suppliers.
- VIII. Ensure that supplier's staff working on our premises are treated with the same respect for diversity and workplace safety as our own staff.
- IX. Base our supplier selection on objective and transparent criteria that include the consideration of environmental, social and ethical performance.
- X. Cease trading with suppliers showing persistent disregard for important elements of environmental, social and ethical performance.
- XI. Act as an advocate for responsible supply chain practices within our industry sector.

Supplier Operating Principles

PwC expect that all our suppliers adhere to the Operating Principles set out below.

- A. Suppliers are expected to have management systems in place for delivering compliance with the Operating Principles in their own operations and those of their suppliers.**
- B. Suppliers should comply with all relevant legislation in the countries in which they operate and all relevant International Labour Organisation (ILO) conventions.**
- C. Suppliers are expected to communicate their expectations for compliance on all the issues raised within the Operating Principles to all relevant employees and suppliers.**
- D. Suppliers should provide evidence to enable assessment of the implementation of the Operating Principles by PwC, those acting on their behalf and other relevant independent 3rd parties.**

Society

PwC seeks to ensure that the working conditions at suppliers of the products and services we purchase meet the standards of the International Labour Organisation (ILO) and the Universal Declaration of Human Rights (UDHR).

We expect our suppliers to adopt and demonstrate the following standards of social Compliance:

- I. **Child Labour:** Organisations should ensure the effective long-term elimination of child labour, in a manner consistent with the interests of the children concerned. Children or young persons under 18 shall not be employed at night or in hazardous conditions.
- II. **Forced Labour:** There should be no forced, bonded or involuntary labour and no workers are required to lodge “deposits” or identity papers with their employers and should be able to leave after giving reasonable notice.
- III. **Health, Safety and Hygiene:** All employees should expect to work in an environment that is both safe and healthy. Adequate steps should be taken to prevent accidents occurring in the normal course of work. Workers should receive suitable health and safety training and have access to clean toilet facilities and clean drinking water as required.
- IV. **Discipline:** Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is not acceptable. Disciplinary and grievance procedures shall be clearly documented and communicated to all employees. All disciplinary measures of a serious nature shall be recorded.

- V. **Freedom of Association and Employee Representation:** All workers and employers have the right to form and join organizations of their own choosing without prior authorization.
- VI. **Working Hours:** working hours should not be excessive and shall comply with relevant national laws. Overtime should be voluntary.
- VII. **Equality of Treatment:** Organisations will seek to eliminate discrimination in access to employment, training and working conditions, on grounds of race, colour, sex, age, religion, political opinion, national extraction, sexual orientation, disability or social origin and promote equality of opportunity and treatment
- VIII. **Remuneration:** Wages and benefits afforded to employees should meet national standards. Workers should be provided with clear written information on their pay and conditions. Excessive deductions on wages should not be permitted as a disciplinary measure.
- IX. **Employment terms:** All workers should be provided with simple, written contracts which must detail the terms and conditions of their employment. Contracts should be clearly understandable to each worker. Work performed should be on the basis of recognised employment law and practice.
- X. **Community impact:** Organisations are encouraged to support the communities in which they operate through appropriate community initiatives.

Environment

We seek to ensure that appropriate attention is paid to environmental issues when PwC purchase products and services.

In all cases suppliers should be able to demonstrate environmental policies and management systems sufficient to ensure continuous improvement in environmental performance. Therefore, suppliers should be able to demonstrate:

- I. Documented policies regarding environmental management.
- II. The ability to monitor and review environmental performance.
- III. The degree to which operations are covered by recognised environmental management systems or the organisations intentions towards such accreditation.
- IV. The awareness of potential environmental risks inherent in their production, service or sourcing activities.
- V. The implementation of mechanisms and processes in place to mitigate or minimise potential environmental risks.
- VI. The degree to which products and services have been designed with environmental considerations in mind.

Suppliers should seek to:

- VII. Minimise the use of energy, water and raw materials where practical.
- VIII. Maximise the use of recyclable and renewable materials including energy where possible.
- IX. Make practical efforts to minimise waste and dispose of it in a safe, efficient, and environmentally responsible manner.
- X. Avoid contamination of the local environment and ensure that emissions, air, noise and odour pollution is, as a minimum, within nationally defined limits.

Ethics

PwC has clear ethical standards and arrangements to promote and encourage compliance: similar standards are expected of our suppliers. Suppliers should be able to demonstrate the existence of processes and procedures to implement appropriate staff guidelines and codes of conduct.

Suppliers should ensure that management systems and practices are in place to ensure the prevention of:

- I. Money Laundering.
- II. Insider Trading.
- III. Conflicts of Interest.
- IV. Fraud, Bribery and Corruption and other improper Payments or Gifts.
- V. Unauthorised access to personal and business information.

References

The [United Nations Universal Declaration of Human Rights](#). This sets “a common standard of achievement for all peoples and all nations” and represents a set of core international ethical standards.

The [United Nations Convention on the Rights of the Child](#). This has been ratified by almost every member state in the United Nations and provides a framework for interpreting the best interests of the child.

The [Conventions](#) of the [International Labour Organisation](#). The ILO incorporates government, employer and employee representatives and is responsible for setting international labour standards. The ILO Conventions have the force of international law and are binding for states that have ratified them.

The [ILO Declaration on Fundamental Principles and Rights at Work](#) require all 174 ILO member states to respect, promote and realise the principles contained in the seven core [ILO Conventions](#), regardless of ratification. These are:

Conventions [29](#) and [105](#) & Recommendation [35](#) (Forced and Bonded Labour).

Convention [87](#) (Freedom of Association).

Convention [98](#) (Right to Organise and Collective Bargaining).

Conventions [100](#) and [111](#) & Recommendations [90](#) and [111](#) (Equal Remuneration for male and female workers for work of equal value; Discrimination in employment and occupation).

Convention [138](#) & Recommendation [146](#) (Minimum Age).

Although not core ILO conventions, [the following ILO standards](#) are especially relevant to the standards of this code:

Convention [135](#) & Recommendation [143](#) (Workers' Representatives Convention).

Convention [155](#) & Recommendation [164](#) (Occupational Safety & Health).

Convention [159](#) & Recommendation [168](#) (Vocation Rehabilitation).

Convention [177](#) & Recommendation [184](#) (Home Work).