



**OXFAM**

## **INTERNAL POLICY**

### **Ethical & Environmental Policy 2016**

#### **Key Data**

1.	Title of policy	Ethical and Environmental Policy
2.	Author name	Alex Cole-Hamilton, Head of Corporate Responsibility
3.	LT sponsor	Alison Hopkinson
4.	Area of governance	Corporate Responsibility
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6.	Date for review	Oct 2019
7.	Approved by	Leadership Team
8.	Geographical scope	All countries where OGB operates
9.	Status	Public

#### **Section 1: Policy Statement**

Oxfam GB recognises the importance of sustainable development for people living in poverty, and the long term benefits of becoming a more sustainable organisation. Oxfam GB takes responsibility for and is committed to managing the labour and environmental standards in its operations and supply chains. In order to embed appropriate management of these standards, the associated framework must be adopted.

#### **Qualifications to the policy**

The humanitarian imperative is paramount. Where speed of deployment is essential in saving lives, Oxfam GB will purchase necessary goods and services from the most appropriate available source.

- This policy is to be read in conjunction with the:  
[Procurement Authority Policy](#)  
[The Green Book](#) Page 48 (Supply and Logistics)  
[ID Logistics, Purchasing & Supply Procedures Manual](#)

#### **Section 2 Policy Details**

##### **Environmental and Labour Standards**

Oxfam GB is committed as a minimum to complying with all applicable labour and environmental legal requirements in its both operations and supply chains.

In addition, Oxfam GB is committed to meeting the labour and environmental standards in Appendices [A](#) and [B](#) and applying a continuous improvement approach within an agreed timeframe where it is known that standards are not met.

When Oxfam GB's sources from small producer groups, it applies the principles of Oxfam International's Values Based Approach to Fair-Trade.

##### **Oxfam GB Procurement Environmental and Labour Principles**

To ensure Oxfam's procurement processes are run with integrity, Oxfam GB employees should follow the principles listed in [Appendix C](#)

Oxfam GB expects suppliers as a minimum, to follow the below-mentioned principles:

- Accept responsibility for labour and environmental conditions under which products are made and services provided. This includes all work contracted or sub-contracted and that conducted by home or other out-workers.

- Be open and transparent about the labour and environmental standards in your supply chains. To provide information requested by Oxfam GB to enable our assessment of labour and environmental standards in their supply chains.
- Support workers to realise their rights and minimise the barriers which prevent workers from achieving them.
- Demonstrate ability to meet local labour and environmental laws.
- Demonstrate commitment to achieve conformance with the ETI Base Code [Appendix B](#) and our environmental standards in [Appendix A](#) and commitment to continuous improvement of their labour and environmental standards as agreed with Oxfam.
- The supplier or parent company should not be involved in any of the activities listed in the Integrity Principles for Oxfam GB Procurement [Appendix D](#).
- Suppliers importing from small scale producer groups facilitate trade in-line with Oxfam GB's values based approach.

Oxfam GB will seek alternative sources where the conduct of suppliers demonstrably violates the basic rights of Oxfam's intended beneficiaries, and there is no willingness to address the situation within a reasonable time period.

Oxfam GB will not knowingly enter into contract or partnership with suppliers that actively lobby to undermine policies to tackle climate change or actively encourage the use of finite resources, including fossil fuels.

## **Implementation**

### Responsibilities

Oxfam GB's Finance & IS Director is accountable

The Head of Corporate Responsibility will be responsible for facilitating and monitoring effective implementation of this policy across the organisation, and for reporting to the Leadership Team and external stakeholders about performance with respect to policy implementation.

Procurement employees will be responsible for implementing this policy with suppliers

Where contract value is over £5,000 or if an item carries the Oxfam brand, Oxfam GB staff will be responsible to engage the [Procurement Category Manager](#) to ensure they complete all necessary procurements steps.

### Monitoring and Reporting

Oxfam GB will establish key prioritised risk based performance indicators and put in place monitoring systems to measure performance against the implementation requirements of this policy.

### Communication

Oxfam GB will effectively communicate this policy to Oxfam GB staff, volunteers, suppliers and supporters

Oxfam GB will make use of multi-stakeholder dialogue to review and ensure Oxfam's actions and reporting meets the emerging expectations of stakeholders

## **Appendix A: Environmental Standards**

Oxfam GB is committed to reduce its reliance on finite/scarce resources and to minimise the environmental impact of its operations including its supply chain, and will work to achieve the standards listed in this section.

To meet this end, Oxfam GB and its suppliers are not only expected as a minimum to comply with all applicable legislation and statutory requirements but also to demonstrate commitment to meet the following standards:

### **Climate change:**

Monitor and actively seek to reduce the Greenhouse Gas (GHG) emissions associated with its operations and:

- Set absolute GHG reduction targets for operations in industrialised countries or Economies in Transition, such as those identified in Annex I of the United Nations Framework Convention on Climate Change [Appendix E](#).
- Set and report on targets for improved efficiency in countries where Oxfam runs programmes, such as those that may be regarded as non-Annex I countries under the UNFCCC

**Waste:**

- Reduce waste to landfill.
- Monitor operations, including procurement, to ensure waste minimisation and high product and process efficiency.
- Effective controls of waste in respect of ground, air, and water pollution are adopted.

**Materials:**

- Reuse, recycling and the use of recycled and recyclable materials are strongly encouraged.
- Avoid where practicable reliance on materials that are heavily dependent on finite resources.

**Packaging:**

- Actively avoid undue and unnecessary packaging wherever practicable and use recycled and recyclable materials wherever appropriate.

**Wood and forest products:**

- Ensure that all forest products purchased are as a minimum legal in origin and provide evidence of due diligence to ensure this if requested by Oxfam GB
- Suppliers of paper products sourced from Oxfam GB UK offices and New Products for Resale carrying the Oxfam Brand, must source forest products from recycled sources or well managed forests which have been certified to a credible standard. Exceptions will be made for products which are Fairtrade marked or produced by members of the World Fair Trade Organisation as appropriate. Oxfam GB views the Forestry Stewardship Council (FSC) as the most credible certification for the sustainable sourcing of wood and forest products.
- Suppliers must never knowingly become involved in, collude with or purchase timber from illegal logging operations.

**Energy:**

- Work to reduce energy consumption and where practicable use energy from renewable resources.

**Transport and travel:**

- Reduce staff travel wherever practicable.
- Monitor and reduce transport logistics to ensure efficient distribution and delivery of products and services.

**Conservation of biodiversity:**

- Seek to minimise the impact of operations on fauna, flora and land to ensure the conservation of biodiversity and habitats.

**Water:**

- Develop a better understanding of its impact on water use and develop management processes where appropriate

**Appendix B: Labour Standards: ETI Base Code ([link](#))**

Oxfam GB respects the labour rights of workers and asks suppliers to accept responsibility for the standards in their supply chains and to take active steps to enable workers to realise their labour rights according to the [Ethical Trading Initiative Base Code](#) as below:

**Employment is freely chosen:**

- There is no forced, bonded or involuntary prison labour.

- Workers are not required to lodge “deposits” or their identity papers with the employer and are free to leave their employer after reasonable notice.

**Freedom of association and the right to collective bargaining are respected:**

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the legitimate activities of trade unions.
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

**Working conditions are safe and hygienic:**

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- The company observing the standards shall assign responsibility for health and safety to a senior management representative.

**Child Labour shall not be used:**

- There shall be no new recruitment of child labour.
- Companies shall develop or participate in and contribute to policies and programmes, which provide for the transition of any child found to be performing child labour to enable her/him to attend and remain in quality education until no longer a child.
- Children and young people under 18 years of age shall not be employed at night or in hazardous conditions.
- These policies and procedures shall conform to the provisions of the relevant International Labour Organisation (ILO) standards.

**Living wages are paid:**

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmarks, whichever is higher. In any event wages should always be high enough to meet basic needs and to provide some discretionary income.
- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment, and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the express and informed permission of the worker concerned. All disciplinary measures should be recorded.

**Working hours are not excessive:**

- Working hours must comply with national laws, collective agreements, and the provisions below, whichever affords the greater protection for workers. The below provisions are based on international labour standards.
- Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week\*
- All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

- The total hours worked in any 7 day period shall not exceed 60 hours, except where covered by the following clause.
- Working hours may exceed 60 hours in any 7 day period only in exceptional circumstances where all of the following are met:
  - this is allowed by national law;
  - this is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce;
  - appropriate safeguards are taken to protect the workers' health and safety; and
  - the employer can demonstrate that exceptional circumstances apply such as unexpected production peaks, accidents or emergencies.
- Workers shall be provided with at least one day off in every 7 day period or, where allowed by national law, 2 days off in every 14 day period.\*
- \*International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced

**No discrimination is practised:**

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

**Regular employment is provided:**

- To every extent possible work performed must be on the basis of a recognised employment relationship established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

**No harsh or inhumane treatment is allowed:**

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

**Appendix C: Integrity Principles for Oxfam GB Procurement**

To ensure we procure with Integrity, Oxfam GB staff will:

- Recognise that our suppliers may not be able to achieve all the Labour and Environmental standards laid out in Appendices [A](#) and [B](#) immediately and we will support suppliers to work toward conformance within a reasonable timeframe.
- Recognise the impact of all supply decisions on meeting the labour and environmental standards outlined in this policy. We will involve our suppliers in addressing issues that may arise and expect them to assist us in minimising any negative effects.
- Ensure that our supply requirements are adequately defined and specified in sufficient time to allow the supply market to react to our demand.
- Ensure that our supply activities comply with all applicable international and national laws, regulations, conventions and agreements that are in force in the countries from where our requirements are being procured, and ensure that the specific supply related requirements of our donors are adhered to.
- Not engage in any activity with suppliers, or buyers from other organisations, which might be deemed to be anti-competitive or in breach of any statutory requirements in any country or trading region.
- Not terminate purchase arrangements or relationships without due regard to all material circumstances, appropriate communication and notification to the supplier. We will however terminate supplier relationships where serious breaches of Oxfam's labour and environmental standards persist after reasonable attempts have been made to work with the supplier to implement improvements, and where there is no reasonable prospect of securing improvements. Such terminations will be carried out in a responsible way.
- Act impartially and objectively in all their purchasing activities and to keep written records where appropriate to demonstrate that their actions have been fair and above reproach.

- Declare in advance any interest commercial or otherwise, they may have with a supplier to Oxfam GB and to be prepared to withdraw from those dealings if required.
- Maintain an unimpeachable standard of integrity in all their business relationships and to foster the highest possible standards of professional competence in all their supply activities.
- Not accept any personal gifts or other inducements, as individually or cumulatively these will be adjudged as an attempt to influence a purchasing decision.
- Comply with both the letter and the spirit of the law, of the countries in which they operate and with which Oxfam GB deals and in all contractual obligations incurred by or on behalf of Oxfam GB.
- Seek the views of its suppliers over their ability to meet Oxfam's labour and environmental standards given existing buying practices, and assists them to meet their concerns.
- Recognise the contribution that stable business relationships can make to the observance of the labour and environmental standards, and endeavour to establish long-term relationships with its suppliers.

#### **Appendix D: List of activities that Oxfam GB suppliers should not be involved in**

Oxfam GB will seek alternative suppliers if we identify the following activities:

- Actively lobby to undermine public policies to tackle climate change or push for continued expansion of fossil fuel use
- Arms manufacture;
- The sale or export of arms or strategic services to governments which systematically violate the human rights of their citizens, or where there is internal armed conflict or major tensions, or where the sale of arms may jeopardise regional peace and security.
- Tobacco production and sale;
- The sale of baby milks outside the World Health Organisation (WHO) Code of Conduct;
- Pesticide sales outside the Food and Agriculture Organisation (FAO) guidelines for pesticide retailing
- Extractive industries
- Production or publication or broadcast of adult entertainment
- Knowingly become involved in, collude with or purchase timber from illegal logging operations.
- Any other activities which violate the basic rights of Oxfam's intended beneficiaries.
- Activities which contravene the Integrity Principles listed in [Appendix C](#)
- public or formal party political involvement or activity that compromises Oxfam's independence.

Suppliers must declare any formal party political involvement or activity

#### **Appendix E: Annex I countries, United Nations Framework Convention on Climate Change**

Australia, Austria, Belarus, Belgium, Bulgaria, Canada, Croatia, Czech Republic, Denmark, Estonia, European Union, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Japan, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Monaco, Netherlands, New Zealand, Norway, Poland, Portugal, Romania, Russian Federation, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, Ukraine, United Kingdom of Great Britain and Northern Ireland, United States of America.