

Oxfam GB Ethical & Environmental Policy

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LT Sponsor:	Director of Integrity and Ethics (Kate Sayer)
Approved By:	Council
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Geographical Scope:	Worldwide, except in countries where following this policy contravenes local legislation. In these cases, local legislation must be followed.
Implementation owner:	All Oxfam GB managers.
Circulation:	Public

VERSION CONTROL

Version Number	Date Approved	Approved By (Name & Title)	Brief Description of Changes
	17 Dec 2020		The key revisions in this version are: <ul style="list-style-type: none">i. the scope covers OGB's UK-based procurement teams (since non-UK based teams work to the Oxfam supplier code of conduct);ii. Oxfam's sourcing (buyer) commitment (2.a) has been strengthened.iii. improved environmental standards, in particular a new standard on cotton.iv. three additional activities which we ask suppliers to disclose (the last three bullet points of section 5).

POLICY STATEMENT

Oxfam GB recognises the importance of sustainable development for all people living in poverty, without discrimination, 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. To embed appropriate management of these standards, the associated framework has been adopted.

SCOPE AND ELIGIBILITY

This policy applies across all Oxfam-GB operations and supply chains. This includes all UK based procurement teams and all UK based budget holders who manage spends of up to £500,000.

Since the humanitarian imperative is paramount, where speed of purchase and distribution is essential in saving lives, Oxfam GB will purchase essential goods and services from the most appropriate available source(s). What this means is that in exceptional circumstances, where it has

not been possible to plan ahead to meet humanitarian needs, the standards in this policy may not be as rigorously applied.

POLICY PURPOSE

This policy outlines Oxfam-GB's ethical and environmental standards to the people carrying out its work, including staff and third parties, in particular its suppliers.

RELATED DOCUMENTS

The links in this section are intended to ensure Oxfam's effective implementation of this policy. All policies can be made available on request. Oxfam staff should read this policy in conjunction with:

[Procurement Authority Policy](#)

[Procurement Procedures](#)

[The Operational Handbook](#)

[Supply & Logistics Manual](#)

[ID Logistics, Purchasing & Supply Procedures Manual](#)

For Sourced by Oxfam's suppliers only, a guide to the SbO Ethical & Environmental Framework

[Code of Conduct for staff](#)

[Non-Staff Code of Conduct](#)

[Supplier Code of Conduct](#)

OGB [Anti-Bribery Policy](#)

[Oxfam Anti-Fraud and Corruption Policy](#)

[Anti-Slavery](#)

[Anti-bullying and Harassment](#)

[OGB Conflict of Interest Policy](#)

[Dealing with Problems at Work](#)

[Disclosure of Malpractice in the Workplace \(whistleblowing\)](#)

[Equality Diversity and Inclusion Policy](#)

[Gender Equality Policy](#)

[Prevention of Sexual Exploitation and Abuse](#)

[Safeguarding Children Policy](#)

[Safeguarding Adults Policy](#)

[Survivor Support Policy](#)

POLICY CONTENTS

1.0 Definitions

Sustainable: the interaction between humans and the living and non-living natural world determines whether or not something is sustainable. Oxfam bases its understanding on the [Bruntland Commission's](#) definition of sustainable development: *"meets the needs of the present without compromising the ability of future generations to meet their own needs"* and also the human and environmental priorities for urgent action outlined by the United Nations' [Sustainable Development Goals](#).

2.0 Commitments

It is vital that those who work with and for Oxfam GB remain true to its core mission, aims and values. To this end, Oxfam has outlined the minimum standards of behaviour expected of the individuals implementing its work in its [Codes of Conduct](#). Part a) of this section outlines the standards required for Oxfam's staff (and other non-staff implementing our work) to fulfil section 6 of the Codes of Conduct, i.e.: to promote human rights, protect the environment and oppose criminal or unethical activities.

As a responsible buyer, Oxfam tiers its support and incentives to its suppliers to do no harm and continuously improve the ethical and environmental impacts of their particular business and supply chain operations based on levels of risk. Part b) of this section outlines how we expect suppliers to work with Oxfam to achieve our ethical and environmental standards. Those standards are outlined in section 3.

a) Oxfam's sourcing commitment to its suppliers

To ensure that we create prosperous, long term commercial partnerships, we recognise that alongside our commitment to achieving best value, we must achieve a fairer balance of power and responsibility with our suppliers. This commitment has been tailored to Oxfam, but is informed by [ETI's Guide to Buying Responsibly](#).

We acknowledge the impact that our purchasing practices can have on workers, and commit to the standards below to support our suppliers to overcome the challenges that business-as-usual poses to the human rights of people working in Oxfam's operations and supply chain by:

- Complying 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.
- Recognising the contribution that stable business relationships can make to labour and environmental standards, and endeavour to establish long-term relationships with its suppliers.
- Recognising that our suppliers may not be able to achieve all the labour and environmental standards immediately and work with suppliers towards conformance within a reasonable timeframe.
- Continuously working to improve Oxfam's Labour and Environmental policies and practices. Seeking suppliers' views on these standards and ability to implement them. Providing proportionate material and practical support to suppliers to enable them to meet their commitments as outlined in sections 2, 3 and 5 of this policy and to make improvements within reasonable and agreed time frames.
- In the event that a purchase arrangement or relationship must be terminated, we will not do so without due regard to all material circumstances, appropriate communication and notification to the supplier as outlined in the Supplier Contract [9.2]. 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.
- Communicating clearly, promptly and accurately on all issues concerning orders. Ensuring that our requirements are adequately defined and specified in sufficient time to allow the suppliers to react to our requirements.
- Aiming to pay a price that enables our suppliers to provide decent wages and working conditions for their workforce and never knowingly negotiating a price that is below the cost of production.

- Always negotiate lead-times which take account of labour standards impacts and do not trigger excessive working hours or subcontracting. If changes to orders are unavoidable, amending target delivery times accordingly
- 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.

b) Suppliers' commitment

We, the supplier, commit to striving to adhere to the ethical and environmental standards outlined in section 3 below, plus:

- Compliance with all laws and regulations applicable to our business.
- Being open and transparent about the standards in our supply chain and operations, and provide information requested by Oxfam to enable assessment.
- Informing customers if their purchasing practices are undermining the supplier's ability to uphold decent working conditions (including predictable work and living wages) and working with customers to build trust and share accountability for doing no harm and continuously raising standards over time.
- Continually striving to remove barriers based on discriminatory norms. For example, by paying equal wages for equal work and providing equal access to opportunities for all workers to fulfil their potential at work. This may include positive-discrimination to transform uneven access into equal access.
- Not paying, offering, receiving or requesting a bribe, nor engaging in any corrupt behaviour (such as acts of fraud, nepotism, money laundering, terrorism financing or any other form of financial crime). Examples may include colluding with other suppliers to rig bids, overbilling or altering invoices, providing inferior quality goods or failing to declare a conflict of interest. Suppliers should report any such behaviour through Oxfam's confidential reporting lines (please see section 5 below).
- Providing clear, understandable oral and written information to workers, in their own language, on their wages, working hours, benefits, terms of employment and their rights as workers. Providing signposts to independent sources of expert advice.

3.0 Standards

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. We will therefore 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 and timebound GHG reduction targets for all of their operations located in industrialised countries or 'Economies in Transition', such as those identified in Annex I of the United Nations Framework Convention on Climate Change¹.

Waste:

- Follow the Waste Hierarchy; favouring waste minimisation first, then reuse, and then recycling and so reduce the amount of waste sent to landfill or incineration.
- Monitor operations, including procurement, to ensure waste minimisation and seek high product and process efficiency.
- Effective controls of waste in respect of ground, air, and water pollution are adopted.

Materials:

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

Cotton:

- We will not knowingly source new products with cotton fibre or fabric from Uzbekistan, Turkmenistan or Xinjiang (China), unless the supplier can demonstrate how forced labour concerns are being robustly addressed.

Packaging:

- Actively educate to remove undue and unnecessary packaging wherever practicable and use recycled and readily recyclable materials wherever appropriate.
- Plastic packaging use should be minimised where it is clearly excessive (subject to food product preservation), with a preference for the use of recycled and readily recyclable plastics.

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) to be 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.

¹ Countries party to the United Nations Framework Convention on Climate Change:

Australia, Austria, Belarus, Belgium, Bulgaria, Canada, Croatia, Cyprus, 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. https://unfccc.int/process/parties-non-party-stakeholders/parties-convention-and-observer-states?field_national_communications_target_id%5B515%5D=515

Transport and travel:

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

Conservation of biodiversity:

- Seek to minimise the impact of its 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.

Individual procurement decisions will be subject to a fuller list of standards, and the above list is intended to highlight some of the most important ones that will be used in evaluating potential suppliers. Please see appendix C below for how we apply these.

b) Labour Standards

Oxfam GB respects the labour rights of workers in its own operations and asks its suppliers to accept responsibility for meeting these standards by taking active steps to enable workers to realise their labour rights according to the Ethical Trading Initiative's Base Code, which is detailed below.

To know whether or not these standards are being met, Oxfam refers to the [UN Guiding Principles on Business and Human rights](#) which recommend that companies carry out human rights due diligence, provide grievance mechanisms and pay particular attention to the different impacts of business activity on different [genders](#). Oxfam-GB aims to tackle all forms of discrimination. To fulfil our mandate to reduce poverty and suffering, we tackle economic inequality, frame our work through eleven [feminist principles](#) and are in the process of decolonising how we work.

The Ethical Trading Initiative's [Base Code](#):**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.

4.0 Roles and Responsibilities

Oxfam GB's Director of Integrity and Ethics and ultimately Council hold overall accountability for this policy.

All Oxfam GB managers are responsible for its implementation. All staff, volunteers, implementing partners, suppliers and other representatives of Oxfam GB are required to adhere to this policy.

Oxfam GB staff (contracting managers and budget holders) will be responsible for implementing this policy with suppliers. Where contract value is over £500,000, or if an item is deemed high risk or carries the Oxfam brand, Oxfam GB staff are required to engage the Central Procurement Team to ensure they complete all necessary procurements steps. For a total spend of between £10,000 - £500,000 the Central Procurement Team will advise staff responsible for purchasing, and support them with guidelines, templates and training materials. For total spends of up to £10,000, all staff are responsible for using open-access training materials to help them use the right templates and implement guidelines.

The Head of Ethics will be responsible for facilitating and monitoring the implementation of this policy across the organisation, and for reporting to the Chief Operating Officer and external stakeholders about performance with respect to policy implementation. This will include reviewing and updating this policy every three years and in line with good practice, legislative and organisational developments.

5.0 Consequences of non-compliance

In the event that a purchase arrangement or relationship must be terminated, we will not do so without due regard to all material circumstances, appropriate communication and notification to the supplier as outlined in the Supplier Contract [9.2]. 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.

We recognise that a zero-tolerance approach with suppliers and partners could undermine our ability to engage in the best interests of any potential survivor and to address the root causes of an issue. Therefore, with suppliers and partners we take an approach of *zero tolerance to inaction* on ethical and environmental issues. Oxfam GB will terminate a contract where the conduct of suppliers or implementing partners demonstrably violates this policy, and there is no willingness to address any specific instances which arise or address underlying weaknesses in systems which led to the incident, within a reasonable time period. This is in line with Ethical Trading Initiative [guidance](#).

To make a complaint, please use the confidential Oxfam email: speakup@oxfam.org.uk or the Speak Up web form, available online at: <https://oxfam.clue-webforms.co.uk/webform/misconduct/en>

Oxfam GB asks suppliers to disclose any involvement in the following activities or industries and advises that we may seek alternative suppliers if we believe these activities may undermine our mission:

- Active lobbying to undermine public policies to tackle climate change or push for the 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, 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 standards outlined in section 3.
- Public or formal party-political involvement or activity that compromises Oxfam's independence.
- Production or manufacture of pharmaceuticals.
- Commercial activities in illegally occupied territories run by settlers, occupying state or military.
- Companies using land without demonstrable Free Prior and Informed Consent from any local populations that believe they have rights to that land.