

## GLOBAL COMPACT ANNUAL COMMUNICATION ON PROGRESS

<b>Company Name</b>	<b>PA Consulting Group Limited</b>	<b>Date</b>	<b>January 2019</b>
<b>Address</b>	<b>10 Bressenden Place London, SW1E 5DN</b>	<b>Membership date</b>	<b>June 2007</b>
<b>Country</b>	<b>UK</b>	<b>Number of employees</b>	<b>2,551</b>
<b>Contact name</b>	<b>Chris Steel</b>	<b>Sector</b>	<b>Professional Services (Business Consulting)</b>
<b>Contact Position</b>	<b>Member of PA's Management Group</b>		
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To our stakeholders:

I am pleased to confirm that the PA Consulting Group ("PA") reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In this annual Communication on Progress, we describe our actions to continually improve the integration of the Global Compact and its principles into our business strategy, culture and daily operations. We also commit to share this information with our stakeholders using our primary channels of communication.

Yours Sincerely,



Alan Middleton  
Chief Executive Officer

### **Brief description of nature of business**

PA is a consulting, technology and innovation firm. We define success as achieving exceptional results that have a lasting impact on businesses, communities and individuals worldwide. As an innovation and transformation consultancy we believe in the power of ingenuity to build a positive human future in a technology-driven world. We define success as achieving exceptional results that have a lasting impact on businesses, communities and individuals worldwide.

This principle has remained the cornerstone of our ethos since 1943 - and it continues to underpin everything we do.

Our clients choose us because we challenge convention to find the solutions that really work - in practice, not just on paper. Then we roll up our sleeves and get the job done.

Our 2,551 people are experts in a wide range of industries and we bring in specialists from across our firm to ensure our clients receive the best service. Our specific expertise is in energy and utilities, financial services, health, life sciences, consumer and manufacturing, government, defense and security, transport and logistics.

We operate globally from our principal offices in the Americas, Europe, the Nordics, the Gulf and wider Middle East and North Africa region (MENA).

## Statement of support

In our opinion, Corporate Social Responsibility (CSR) comprises environmental, economic and social responsibility. PA's approach to CSR is intrinsically linked to our core business values and we believe that being a socially responsible business makes good business sense. Additionally, PA is a signatory to the United Nations Global Compact, a platform for encouraging and promoting good corporate principles and learning experiences in the areas of human rights, labour, environment and anti-corruption. This Communication on Progress provides an overview of our activities since committing in 2007 to the Global Compact's objectives.

In PA, economic, social and environmental responsibility cuts across almost everything we do and is enshrined in our processes as good business practice including:

- The importance PA places on its people
- Our ethical values
- The value we add to our clients through our services
- The way in which we market ourselves and the basis on which we sell services
- Capability development and sharing
- Management of our practices
- The suppliers we choose and the way we deal with them
- Importance of sustainable profitability
- Accountability

Our Core Values and Code of Ethics that we formalized in 1995 continue to guide our company today. We define sustainability through our values which give rise to our policies, our ethics and our corporate culture. They commit our company and every employee to environmental stewardship, safe work environments, and socially responsible behaviour in our workplaces and our communities, as well as in the consulting services we provide to our clients. PA is fully committed to this and our approach is embodied in PA's policies, service manuals and business practices handbooks.

We are a major global employer and know that to continue to succeed we must draw employees from a rich and diverse talent pool. We rely on the unique contributions of all types of people from all over the world. By improving our performance in the areas of CSR we will be better able to:

- Build our reputation as an employer, enabling us to recruit and retain the best people
- Increase the engagement of our people, so that they always feel able to recommend PA as a great place to work and willingly go the extra mile for our clients
- Improve our standing with clients and all the wider communities in which we operate
- Develop new and wider capabilities and knowledge within PA.

In the spirit of our purpose, we believe PA's CSR initiatives and corporate structure give our people opportunities to bring ingenuity to life, and to create somewhere we all feel proud to work. These initiatives form a key part of our strategy to become *the* premier consulting firm - a strategy whose success will be based on the unique quality of PA that will be seen both by our clients and our people.

### Looking more closely at our initiatives:

**Building an even better place to work:** we are committed to building an inclusive and supportive workplace, where all of our people can excel and bring ingenuity to life every day. We want our people to feel proud to work at PA and make sure we're enabling them to do their best work, so we take an insight-led approach to improving the areas that matter most to them. We regularly measure how our people are feeling about working at PA through our employee engagement survey, which enables us to understand the areas we should celebrate and where we need to focus to make it an even better place to work. In 2018 our people told us that they felt proud of the work they do and had good levels of support from their peer group, as well as opportunities to advance professionally. They felt that more could be done to make PA a more inclusive and diverse place to work, highlighted a need for continued focus on wellbeing, as well as enhanced communications about our business strategy, all of which have become key areas of focus for us this year. Read more about specific steps we have taken this year in 'Actions Taken' against Principles 1 – 6.

**Inclusion and Diversity:** We believe that greater diversity stimulates innovation and creativity, supporting the growth of our people, and enabling us to deliver more enduring results for our clients. We've made strides in this area in recent years, and in our last engagement survey our people told us we should continue to focus in this area. In 2018 we launched a specific Inclusion & Diversity Programme. Our work in this area aims to create a more inclusive environment, which attracts diversity and enables it to thrive.

**Wellbeing:** We want everyone at PA to recognise the importance of looking after their and their team's wellbeing and feel able to ask for support when they need it, and in response to employee feedback, we have also upweighted our focus in this area. In particular, we have been looking at the topic of mental wellbeing and we signed the Time to Change Employer Pledge last year, setting out a commitment to continue to tackle the stigma associated with mental health in the workplace.

**Partner Ethics** (doing the 'right thing', rather than 'the easy thing') reflects the standards we set out for our partners, as our partners have such a significant role as leaders in our firm. Their behaviour, actions and inactions impact our firm, our people, our clients and our broader environment, in many ways. Beyond our role as corporate citizens, our partners have a major influence on our people and on our strength and stability as a firm. The standards of ethical behaviour we set for partners are valued (and assessed) both for positive reasons – so that we can become as great a firm as we aspire to be and project a strong positive profile to our clients and our people, and to avoid negative issues – with poor actions creating damages or risk. Our review of PA-wide Ethics includes continuous improvement principles – as we look for ways to further improve ethical behaviour across PA, to further raise the standards we set ourselves and to ensure that we achieve our standards even more often and even more completely

**Giving Back and Volunteering** reflects a strong desire among many people in PA to take part in activities or actions which contribute something to meet the needs of wider society, such as involvement with charities and other social causes. We think the best way that PA can support social causes is through the time and skills of our employees. As such, our people interested in committing time to a socially worthwhile project will be able to spend up to three days a year to eligible projects.

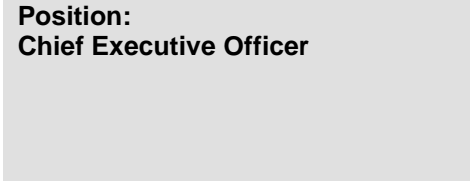
**Speaking Up/Whistle blowing** is about encouraging people across PA to take active responsibility for improving our performance, whether through enhancing working practices or drawing attention to behaviours or other issues which give them concern. This involves introducing procedures and mechanisms to allow people to speak up, and the cultural change that will give them confidence to do so in good faith and in the expectation of being heard.

**Greening PA** is concerned with the assessment and reduction of the environmental impacts of PA's business operations. This initiative involves setting of environmental objectives with the aim of continual improvement in the way we operate. Where possible, PA works to the standard of ISO14001 and the Carbon Trust Standard, both of which PA are currently accredited to. Greening PA also focusses on monitoring of our supply chain to ensure where possible that PA only work with suppliers who are environmentally ethical and share the same environmental values we do. To ensure we continue to do the right thing, our Environmental Management System is integrated in our business strategy with key members of our senior management team at the forefront. Furthermore, we run regular environmental awareness campaigns where we engage with our people and undertake workshops which aim to highlight the environmental work we have carried out, the impact we have on the environment and what our employees can do to help.

**Signature**



**Position:  
Chief Executive Officer**



**PRINCIPLE 1 BUSINESS SHOULD ENSURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES**

**PRINCIPLE 2 BUSINESS SHOULD SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS**

### **Our Commitment or Policy**

PA believes respect for the dignity, rights and ambitions of all people is a cornerstone of business excellence. We treat all employees equitably regardless of local economic conditions, traditions and cultures. We do not tolerate harassment, discrimination, threats or acts of violence, intimidation or coercion. We permit no exploitation of children, physical punishment or abuse. We do not use forced labour, including bonded, indentured or prison labour.

We are committed to complying with all laws and regulations applicable to our business. Our commitment is reflected in our policies which require all PA people to act ethically and with integrity in all our business relationships. This includes taking steps to ensure that there is no human trafficking or slavery in our supply chain or within any part of our business.

Our commitment is underpinned by a consistent and fully documented set of global operating procedures.

### **A brief description of our Processes or Systems:**

**Performance Management:** PA maintains an automated process of personnel reviews, myCareer, which requires twice-yearly downward reviews of all employees as well as upward and peer reviews of senior consultants and partners. These 360-degree reviews are provided to line managers and PA's Partner Election Committee. Through this process, PA encourages all employees to comment on and document the behaviours of our senior management against the published norms for these ranks. Feedback is encouraged outside of these two formal review points and all employees can give feedback to anyone of any rank at any time via our myCareer system.

**Speaking Up** is a confidential channel available to all PA people where they can register any concerns or issues they may have about the conduct of any member of the firm and help us to maintain the high professional standards we all expect. We recognise the difficulties created for individuals by others' poor behaviour and how this challenges our ambition to create a more inclusive workplace and encourage our people to speak up with confidence that each of us will be heard and supported. Employees can also raise their concerns anonymously through this channel if required.

**Measuring Employee Engagement:** to ensure we can continue to make PA an even better place to work and remove barriers to performance, we regularly measure how our people are feeling about working here through our employee engagement survey, identifying the areas where we are making progress, and where we need to focus next. In 2018, our survey revealed a need for continued focus in the fields of Inclusion & Diversity and Wellbeing, as well as improvements in our strategic communications to our people. Specific actions undertaken are outlined below. We plan to survey our people again in 2019 to understand our progress and intend to move towards a more agile, consistent means of measuring engagement at PA.

**People policies:** we make sure we have fair, consistent and supportive people policies in place to address the needs of our diverse workforce from the day they join PA until the day they leave. These policies are in line with minimum legal requirements and, in many cases, exceed them. We review these on a regular basis to ensure they are reflective of our ambition to create a more inclusive and supportive environment where all of our people can excel. A good example is our Flexible Working Policy, through which we invite people to apply for alternative working arrangements that provide them with the flexibility they need to be successful and achieve the work-life balance that is right for them. We have many employees across various ranks and geographies who enjoy a flexible working arrangement such as part-time working, compressed hours, 9-day fortnights, sabbaticals or career breaks.

### **Actions implemented in the last year / planned for next year:**

**Learning & Development:** We continue to promote the PA Academy which provides our people with access to learning and a range of resources, available 24/7. We have invested significantly in developing our coaching capability, to provide quality support at an individual level to all ranks in PA. We have skilled up to a qualified level coaches in all our prime geographies and their support is available via the PA Academy.

**Inclusion and Diversity:** this year we formed a global Inclusion & Diversity (I&D) Steering Committee and launched our global I&D programme, committed to building a more inclusive culture that drives diversity. To kick-start the programme, we hosted a series of ‘Building an Inclusive Culture’ workshops, which all of our Partners, Managing Consultants, Directors and senior administrative staff have now attended. The sessions were designed to raise our leaders’ awareness of unconscious biases and how they can impact inclusion. In the year ahead, our leadership team will be responsible for engaging their teams in the conversation around inclusion and diversity and setting their own commitments for building a more inclusive PA. Another area of focus has been the completion of diversity data, to help us better understand the composition of our workforce today and how we might want this to evolve in future. We have launched several Diversity Networks and provided new ways for our employees to connect with one another. We now have established PRIDE and BAME (Black, Asian, Minority Ethnic) Networks and this year plan to launch our Women’s Network. We’re also supporting inclusion through other initiatives, such as PA’s Reverse Mentoring scheme, which sees more junior members of the organisation mentor our more senior leaders, fostering cross organisational collaboration. Finally, we completed a piece of exploration work to better understand the reasons for the relative lack of diversity at senior levels in PA; the findings from this research will inform our plans for the year ahead and are likely to involve refinements to several people practices and policies to support greater inclusion and diversity in future.

**Wellbeing:** this year we introduced a new Mental Health programme, encouraging our employees to support us in challenging the stigma around mental health. We signed the Time to Change pledge to further reinforce this commitment and engaged our people through a series of wellbeing-related communications campaigns. This year we plan to build on our progress by introducing Mental Health training for our managers at PA, as well as broadening out our wellbeing approach to also cover physical health and lifestyle related elements.

**Measurable Results or Outcomes**

While PA does not set standards for measures in this area our employee engagement results can be considered an indication of progress and the levels of goodwill we are engendering in our people. 70% of our people took part in our 2018 employee engagement survey, and we achieved an engagement level of 72% across the firm (the number of positive answers to the question How likely is it you would recommend PA as a place to work?). We will continue to work to improve both participation and levels of engagement over time, focusing on the areas that our people tell us will make the biggest difference to their experience at PA.

<b>PRINCIPLE 3</b>	<b>BUSINESS SHOULD UPHOLD THE FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING</b>
<b>PRINCIPLE 4</b>	<b>BUSINESS SHOULD SUPPORT THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR</b>
<b>PRINCIPLE 5</b>	<b>BUSINESS SHOULD SUPPORT THE EFFECTIVE ABOLITION OF CHILD LABOUR</b>
<b>PRINCIPLE 6</b>	<b>BUSINESS SHOULD SUPPORT THE ELIMINATION OF DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION</b>

**Our Commitment or Policy**

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We are committed to complying with all laws and regulations applicable to our business. Our commitment is reflected in our policies which require all PA people to act ethically and with integrity in all our business relationships. This includes taking steps to ensure that there is no human trafficking or slavery in our supply chain or within any part of our business.

### **A brief description of our Processes or Systems**

PA is committed to building an inclusive and supportive culture where diversity thrives, and all of our people can excel. We believe that greater diversity stimulates innovation, enabling us to fulfil our purpose of 'Bringing Ingenuity to Life', supporting the growth of our people, and delivering more enduring results for our clients.

### **Actions implemented in the last year / planned for next year**

This year we formed a Global Inclusion & Diversity Steering Committee to lead a global Inclusion & Diversity programme, designed to help us build a more inclusive culture at PA that drives diversity. Key areas of focus are outlined in response to Principles 1 and 2.

### **Supplier Diversity**

PA views diverse suppliers as small and medium enterprises; suppliers from underrepresented or ethnic minority groups; and suppliers demonstrating a diverse workforce composition. Our supplier diversity policy helps ensure that the contracts that PA places with suppliers provide value for money, and that a diverse range of suppliers have fair opportunity to compete for and win new work. We also encourage our suppliers to adopt best-practices in terms of diversity and monitor this through our supplier pre-qualification questionnaire. This brings real business benefits through:

- Increasing competitiveness by identifying suppliers who are more efficient, flexible, innovative, and committed
- Providing access to new markets
- Demonstrating engagement with underrepresented or ethnic minority groups
- Promotes ethical Corporate Social Responsibility

We will strive to ensure that the purchase of goods and services is undertaken in line with our inclusion and diversity commitments and, whenever possible, is from agencies or companies who share our values on equality of opportunity and diversity by:

- Assessment of our success in attracting a wide range of suppliers to tender for work
- Analysis of the distribution of contracts awarded between businesses of different sizes and ownership
- Regular review of procurement practices to ensure consistency and to identify any barriers to minority owned businesses demonstrating value for money.

PA is committed to a consistent and fair tender process and to facilitate this, for centrally coordinated tenders, all potential suppliers will receive:

- Request for quotation/proposal letter inviting suppliers to participate
- Intent to respond document
- Non-disclose document.

Upon completion of these documents, suppliers wishing to tender will receive the RFQ/RFP which includes timescales and the format of responses that suppliers must adhere. All tenders provide for an opportunity to allow suppliers to respond with questions and to give an identical time period for all to respond.

### **Measurable Results or Outcomes**

To ensure that a diverse supplier base is aware of opportunities to work with PA, we benchmark with at least three (3) suppliers; review periodically the channels by which we attract supplier interest and identify and address any barriers to involvement; and seek advice from external sources on appropriate ways of attracting diverse expressions of interest for different types of work and introductions to networks with knowledge of underrepresented groups. We actively engage a diverse base of organisations to help them understand our bidding process and raise their awareness of business opportunities.

PA are signatories to The Prompt Payment Code (PPC). This code sets a standard for payment practices and best practice and is administered by the Chartered Institute of Credit Management. Compliance with the principles of the Code is monitored and enforced by the Prompt Payment Code Compliance Board. The Code covers prompt payment, as well as wider payment procedures.

PA has just filed its second set of results for the Government led legislation Duty to report. This scheme was introduced in 2017 to monitor the payments to SME's and Sole traders. The Payment practices applies to large companies and LLP's that exceed over a certain size and turnover criteria. This data can be found on the governments website [here](#).

PA is committed to treating their suppliers fairly no matter what size.

<b>PRINCIPLE 7</b>	<b>BUSINESS SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES</b>
<b>PRINCIPLE 8</b>	<b>BUSINESS SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY</b>
<b>PRINCIPLE 9</b>	<b>BUSINESS SHOULD ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES</b>

**Our Commitment or Policy**

PA tries to keep its responsibilities in respect of the environment in mind, in the development of its services and in the effective running of the business. Although our impact on the environment is limited by the nature of our operations, we do take direct action to mitigate our impacts, particularly in relation to our real estate, technology assets, employee business travel, and procurement of goods and services.

As part of our commitment to protecting the environment, we seek to reduce our impact to water, land and air, aiming for continual improvement. We work hard to comply with all applicable legal and other requirements relevant to the environmental impacts of our operations. We have implemented a fully documented Environmental Management System (EMS) which includes the framework for setting our objectives and targets and ensuring that the international standard of ISO14001 is met or exceeded. We are also committed to attaining the ISO 50001 Energy Management System accreditation in the UK to ensure year on year reduction in our carbon emissions. We calculate and publish our emissions in our annual Carbon Footprint Report.

We strive to achieve environmental best practice:

- Maintaining effective waste management, separating and recycling waste wherever possible, and disposing of waste responsibly
- Enhancing energy efficiency through prudent consumption, monitoring of energy use, and consideration of energy efficient technology and renewable alternatives
- Implementing an environmental awareness campaign to promote employee participation to help reduce the environmental impacts of PA’s operations
- Monitoring and reviewing our environmental performance to ensure that progress towards our objectives and targets is maintained.

**A brief description of our Processes or Systems**

PA’s approach is to aim to maintain effective and efficient documented environmental management procedures as part of our Environmental Management System, which aims to reduce our significant environmental impacts, namely, water and energy consumption, waste production and chemical consumption and handling. It is also our intention to comply with, all statutory and regulatory requirements, national and international standards and industry practices in PA owned premises. PA does its best to raise employee awareness of environmental issues and attempts to utilise industry best practices wherever possible. To this end, PA is committed to raising environmental standards and following an environmental policy of continual improvements and pollution minimisation. We aim to undertake a positive action programme by committing to new objectives and setting annual targets relevant to our significant impacts and data we collate, whenever appropriate, being transparent in respect to disclosure of our environmental performance.

**Actions implemented in the last year / planned for next year**

As a company that firmly believes in innovation, PA is leading the way in reducing our own energy usage and carbon footprint with an innovative approach. Working with British Gas – a Centrica company, PA are continuing to implement and expand an engineered Eco|Solution holistically addressing energy usage in areas responsible for the highest consumption of energy across the business.

As part of the Eco|Solution, the operational energy flow of PA buildings are assessed and optimised. Independently sourced and clean technologies are integrated in to a bespoke hybridized design. With the technologies working cooperatively together for maximum results, the solution minimizes energy consumption while also generating clean energy onsite. The first site to be implemented is the Melbourn Office/Global Innovation & Technology Centre in the United Kingdom. Specifically, for this office we carried out boiler optimisation, transformer tap down, Building Management System Upgrade and installed Solar PV. Since implementation there have been commendable savings in terms of energy, cost and carbon. We also follow the principles outlined in ISO14001:2015 Environmental Management Systems (all PA owned real estate is accredited to this standard) and BS8900:2006 Guidance for **Managing Sustainable Development** Initiatives at improving our environmental performance and limiting our carbon footprint include:

- Global office facility survey to improve our measuring and monitoring of our internal ecological footprint leading to reduced costs and resources consumption.
- Reviewing the ecology of PA owned premises to encourage indigenous species whilst identifying non-indigenous and invasive species with a view to removal where possible.
- Promoting and increasing the use of video conferencing and web-conferencing facilities to reduce staff travel where practicable. Review and consideration of new media technologies further prevent unnecessary travel.
- Regularly reviewing utility providers to PA premises and where possible utilising energy provided from renewable resources.
- Continuous examination of PA's global server configuration to reduce energy consumption.
- Annual all-staff survey on our CSR efforts to establish an unequivocal baseline of employee attitudes and behaviours, as well as build employee confidence in PA's ethics and values.
- Sub Metering: Electricity sub meters have been strategically installed throughout the real estate we own to allow analysis of energy consumption patterns as well as quantify energy savings. The system can be logged onto via Energy360 where reports can be run off for specific meters and timescales
- We have established a network of environmental champions to ensure environmental best practices throughout our offices and regularly consult with our people for their input on what we could do better and how they can get involved.
- Electric charge points have been installed at PA owned premises which are available for use by our staff and clients, encouraging the use of electric vehicles.
- PA makes every effort to reduce air emissions. Nearly all emissions come from transportation and are quite low as compared to those of other professional services sectors. We have implemented a cycle to work scheme, car share and taxi pooling initiative to aid the reduction in emissions from scope three.
- Comply with applicable discharge, permit and other requirements to eliminate citations, notices of violations and other regulatory actions.
- Review of both incumbent and future service providers with a view to ensuring where possible they adhere to the standards set out in ISO14001 and to ensure we select the correct providers to work with to help us minimise our impact on the environment.
- LED lighting assessment across all PA owned sites to measure efficiency and ensure the benefits across PA owned sites. Where possible and when reasonably practicable upgrade existing lighting systems to LED.
- Aim to minimise the amount of waste generated in PA's premises, this is to be achieved through reduction of unnecessary consumables.
- Continued use of alternative waste streams and service providers to deliver 100% land fill diversion from all PA owned premises.



- Minimise our inventory of non-printing paper supplies (notepads, notebooks, etc.), general office supplies. Examples may include pens from recycled plastic and be recyclable, notepads from recycled paper and paper cups, plates and plastic utensils phased out entirely.
- Ensure that as a business we are utilizing the double sided printing facility on all printers and work with electronic documents where possible.
- Globally utilizing email communications rather than print. For instance, Christmas cards to clients were produced and sent via email.
- Develop a Green Campaign to increase the awareness of our impact on the environment throughout our employees and how they can help to reduce this. This provides a forum in which to consult and engage with our people to gain their input on how we could do things better.
- Develop Giving Back/Volunteering relationships/strategic partnerships, etc. that allow our employees to channel their effort into projects that help reduce/offset one's carbon footprint.

### **Measurable Results or Outcomes**

Each year PA measures and validates its carbon emissions, as part of its on-going efforts to reduce its impact on the environment, and to implement steps to make all their business activities more sustainable. We are continuously looking at new ways of evaluating our environmental performance. We currently collate data on energy consumption, water consumption, waste production, paper usage and plot this against various parameters, data is reviewed in detail every year which means we are able to focus on areas that need priority attention, and examine key changes affecting our business. As a result, we set targets to significantly reduce our emissions year on year. These are achieved through a number of initiatives including:

- Tighter control of heating, cooling, and lighting in office areas
- Travel and transportation controls
- Waste recycling campaigns
- Employee awareness campaigns and workshops
- Working to the principles of the ISO 50001 Energy Management System and those set within the ISO14001 standard.

We believe our supply chain management has served PA well. Within our UK and US markets, the process has proven effective at resolving environmental and social issues that may arise with our suppliers. As our business expands globally, we are gaining a better appreciation of the challenges to ensure that these same practices and standards are applied equally to all of our operating locations and new methods and reporting standards adapted to address our impacts systematically and holistically throughout the firm. We are developing numerical metrics and Key Performance Indicators to baseline our business impacts and those of our suppliers.

<b>PRINCIPLE 10</b>	<b>BUSINESS SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY</b>
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### **Our Commitment or Policy**

It is PA's policy that no employee, representative or agent of PA shall do business for or on behalf of PA in such a manner as to violate local, state or federal laws of any country in which we conduct business or to engage in any activity that might have the appearance of an illegal or unethical act. This is set out in our Code of Conduct.

### **A brief description of our Processes or Systems**

PA complies with the UK Bribery Act and the FCPA. All staff have been trained in knowing how to spot situations of high risk and how to report anything suspicious.

The prevention of bribery and unethical practices is part of our Code of Conduct which all employees must adhere to.

Our trading contracts have anti-bribery clauses and our supplier selection process questions the potential supplier about their processes for preventing bribery and corruption.

All new employees undergo anti-bribery training as part of the orientation of new employees. Current employees are reminded of their obligations through the Code of Conduct and any updates. Certain training courses also provide reminders (e.g. Legal Course for Consultants or Commercial Leadership in PA) which are targeted at people more likely to encounter unethical situations. Work outside of our normal office locations is scrutinised for risks by our High-Risk Assignment Committee which will include assessing any bribery risk. (E.g. the use of agents is very carefully scrutinised).

**Actions implemented in the last year / planned for next year**

Our procedures for the prevention of bribery have recently been reviewed and minor amendments have been made to our policies. New e-learning training for those joining the company has been provided

**Measurable Results or Outcomes**

All full-time employees complete anti-bribery training and logs are kept. Global Procurement has details of suppliers' acknowledgements to ensure they have adequate procedures in place to prevent bribery.

**How do you intend to make this COP available to your stakeholders?**

This Communication on Progress will be submitted to the Global Compact and made publicly available. PA may include relevant sections of the COP published in PA's Annual Report.