

Sustainability Compliance Guide

for External Business Partners



*What you need to KNOW
and
what you need to DO
to COMPLY
with
P&G's Sustainability Guidelines*



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I. Introduction

Purpose:

The purpose of this guide is to share P&G’s expectation with our External Business Partners (“EBP”) on standards of social and environmental sustainability, and how to apply these standards to their supply chains.

P&G’s Corporate Social Sustainability Commitments:

P&G is committed to support sustainable development across the corporate end-to-end supply chain. Tied to our company purpose, our sustainability objective is to create industry-leading value with brands and products that consumers prefer, while at the same time conserving resources, protecting the environment and improving social conditions for those who need it the most. We want to provide a better quality of life for everyone, now and for generations to come. Our responsibility to meet these commitments requires our organization and our partners to take responsibility for the impacts of their decisions and activities on society and the environment through transparent and ethical behavior that:

- Contributes to sustainable development, including health and welfare of society
- Takes into account the expectations of stakeholders
- Is in compliance with applicable laws and consistent with international norms of behavior
- Is integrated throughout the organization and practiced in its relationships

P&G has formalized its sustainability commitments through our WBCM, which includes our PVPs (https://www.pg.com/en_US/downloads/company/governance/Policy_Worldwide_Business_Conduct_Manual.pdf), a Human Rights Policy Statement (**Appendix 1**) and our Sustainability Guidelines for External Business Partners (**Appendix 2**).

Sustainability Guidelines for External Business Partners:

It is P&G's belief that how we operate as a Company, and as individuals, is based on the principle of doing the right thing in all that we do. This leads consumers to place their trust in us, our customers and business partners to do business with us, our shareholders to invest in us, our external stakeholders to respect us, and the best talent to join us in working for P&G.

We operate within the spirit and letter of the law, maintaining high ethical standards wherever we conduct business. We actively seek business relationships with partners who share our values and promote the application of these high standards among those with whom they do business.

The **Sustainability Guidelines for External Business Partners (Appendix 2)** explain the global standards to be followed in your daily business activities on behalf of P&G. EBPs and their suppliers are expected to share P&G's commitment to these standards. P&G reserves the right to conduct audits to assure compliance with these guidelines and also reserves the right to discontinue any relationship should the external business partner violate, fail to correct, or have a pattern of violating these guidelines.

P&G requires that EBPs read and understand these guidelines, and make sure their processes are aligned to them. We also encourage our EBPs to set similar expectations with their own suppliers.

II. Audits

Audit:

Audits are used as a tool to identify and address social and environmental sustainability issues at EBP sites. P&G requires some EBPs to execute Audits to confirm their Sustainability status. We see audits as an opportunity to continually improve our operations and the way we conduct business. We highly encourage our EBPs to reapply this practice with their own suppliers, so we can jointly learn about our supply chains and make them more robust and competitive.

P&G selected the SMETA audit (SEDEX Members Ethical Trade Audit) as the methodology of choice. SMETA was created by the membership of SEDEX (Supplier Ethical Data Exchange), a non-profit organization promoting ethical and responsible supply chains, to provide a central agreed audit protocol, which can be confidently shared via the SEDEX online platform (SEDEXglobal.com).

P&G requires SMETA 4-pillar audits. A SMETA 4-pillar audit includes labor standards, health & safety, entitlement to work, subcontracting, environment and business practices. SMETA utilizes the Ethical Trading Initiative (ETI) base code and the local law as main pillars. Additionally, P&G Sustainability Guidelines and the Minimum Compliance Standard can stay at the basis of the audit content.

Selection Process for EBP & Frequency:

P&G executes regular assessments of their supply base, combining external elements (Verisk Maplecroft country risk) and internal focus areas. The output of this assessment is a list of EBPs to be audited. Audits are required every 2 years, however P&G may adjust the timing as needed.

Multiple Sites:

Audits are conducted at site level. If the EBP has multiple sites supplying to P&G, P&G will advise which site(s) will be audited independently.

Cost:

As the methodology is standard and the audit results are owned by the EBP and can be shared with multiple customers, the cost of the audit is covered by the EBP. By eliminating the duplication of multiple audits, EBPs are able to save time and resources and achieve greater efficiency with their business partners.

Accepted External Audit Firms and Audit Methodologies:

P&G uses external audit firms to conduct the audits. P&G has an agreement with the inspection, verification, testing and verification company Societe Generale de Surveillance (SGS), which enables

EBPs to benefit from a negotiated price. SGS tracks and reports progress to P&G bi-weekly and are familiar with P&G’s non-compliance management. SGS is therefore the preferred audit firm. P&G will also accept External Audit Firms and Audit Methodologies identified in the table below provided that the EBP follows these steps:

- Communicate schedule for the audit to EBP Relationship Owner. The EBP Relationship Owner is the P&G primary point of contact for non-compliance issue remediation
- Ensure EBP Relationship Owner is copied on the audit report
- Post the audit report on SEDEX platform (not the audit certificate) and ensure it is visible to P&G.

Social Compliance Auditors	Alternative Audit Methodologies accepted
<ul style="list-style-type: none"> • Societe Generale de Surveillance (SGS) • Bureau Veritas • Verisio • UL Responsible Sourcing • Elevate • Verite • Intertek • RINA (SA8000) • Control Union 	<ul style="list-style-type: none"> • Business Social Compliance Initiative (BSCI) • Electronic Industry Citizenship Coalition (EICC) • Ethical Trading Initiative (ETI) • Fair Labor Association (FLA) • Social Accountability 8000 (SA8000) • Worldwide Responsible Accredited Production (WRAP) • Audit methodologies of other AIM-PROGRESS members

AIM-PROGRESS:

P&G is a member of AIM-PROGRESS, a group of FMCG companies collaborating on Responsible Sourcing. As part of its mutual recognition framework, audits done for other members of AIM-PROGRESS are recognized by P&G. For more details on AIM-PROGRESS mutual recognition framework, please visit: aim-progress.com

SEDEX Membership:

EBPs must become a SEDEX member (B member, annual membership of 40,32GBP+VAT). Being a SEDEX member will provide the following benefits to your organization:

- Have access to a Self Assessment Questionnaire (SAQ) (Environment, Health & Safety, Business Ethics and Labor Standards)
- Upload and store audit reports, certificates and corrective action plans and request an audit
- Share your information with multiple customers

When registering on SEDEX, please create the link with P&G’s companies, so that your audit and the status of remediation are visible to P&G. EBPs should renew their SEDEX membership annually.

Guidance on SEDEX is available online to B members or alternatively through the SEDEX helpdesk:

Email: helpdesk@sedexglobal.com;
 Phone: China: +86 (0)21 6103 1622;
 US/Canada: +1 888 487 6146;
 Europe/Rest of the World tel. +44 (0)20 7902 2320

III. Engagement, Remediation and Escalation

Engagement:

When an audit is due, a notification is sent to the EBP copying the P&G EBP Relationship Owner detailing: the need for an audit, the time for scheduling the audit and registration/linking process for SEDEX. The EBP and EBP Relationship Owner will receive reminder notifications until the EBP has fully engaged with the external audit company and SEDEX system. If the EBP fails or refuses to complete any of the engagement steps, the issue will be escalated.

Audit Remediation:

After the audit is complete, the external audit firm will issue a Corrective Action Plan identifying non-compliance issues with the appropriate remediation steps. After the Audit and Corrective Action Plan are uploaded into the SEDEX platform by the EBP, a notification is sent to the Audited EBP and the EBP Relationship Owner detailing: the Audit results, the Corrective Action Plan and actions required to meet P&G's Minimum Compliance Standard. The Audited EBP and EBP Relationship Owner will receive reminder notifications until the EBP has complied with P&G's Minimum Compliance Standard.

If the Audited EBP refuses to remediate any non-compliance issue or fails to comply with P&G's Minimum Compliance Standard, the issue will be escalated.

External Business Partner Sites must complete the following steps (see **Appendix 3**):

- Ensure Audit is uploaded and published in SEDEX for P&G to view.
- Enter Corrective Actions in SEDEX.
- Alert the auditor the Corrective Actions are available in SEDEX for verification.
- Schedule a follow up or desktop audit (as required) to verify the Corrective Actions are acceptable.
- Ensure follow up audit is uploaded and published and issues are closed in SEDEX for P&G to view.

Minimum Compliance Standard:

Maintaining minimum compliance requires:

- CRITICAL
 - No critical non-compliance issues (as per SMETA) or
 - All critical non-compliance issues remediated and closed with an audit **within 90 days** AND
- MAJOR
 - No major non-compliance issues (as per SMETA) identified in the areas of Accommodations, Children & Young Workers, Discrimination, Employment Freely

Chosen, Freedom of Association/Collective Bargaining, Health, Safety & Hygiene, Discipline/Grievance OR

- o All major non-compliance issues identified in the above areas remediated and closed with an audit **within 90 days**.

Note: an inability of an EBP to have or maintain P&G’s Minimum Compliance Standard or remediated imminent danger issues may lead to reduction in or termination of business.

Imminent danger issues identified and flagged by the auditor must be stopped immediately and remediated within 7 days: these are the critical issues with immediate remediation timeframe as per SMETA, such as child labor under 15 year old or young person engaged in hazardous work, fire exits locked or no fire exits, premises or accommodation not structurally safe, clean drinking water not available, sexual abuse or harassment. These issues will be escalated.

Continuous Improvement:

Continuous improvement must be shown between audits for:

- All major non-compliance issues identified in the areas of Regular Employment, Wages, Working Hours, or Other systems (Environment, Management Systems) and
- All minor non-compliance issues

Audit Category	CRITICAL	MAJOR	MINOR
Accommodations	Minimum Compliance (90 Days resolution)	Minimum Compliance (90 Days resolution)	Continuous Improvement (audit cycle)
Children & Young Workers			
Discrimination			
Employment Freely Chosen			
Freedom of Association / Collective Bargaining			
Health, Safety, and Hygiene			
Discipline / Grievance			
Regular Employment		Continuous Improvement (audit cycle)	
Wages			
Working Hours			
Environment (Other)			
Management Systems (Other)			

Audit Release:

After the Audited EBP has met P&G's Minimum Compliance Standard, a notification is sent to the Audited EBP detailing that EBP has met P&G's Minimum Compliance Standard and reminding the EBP that continuous improvement must be made between audit cycles for all major non-compliance issues identified in the areas of Regular Employment, Wages, Working Hours, or Other systems (Environment, Management Systems) and all minor non-compliance issues.

Visit: <http://www.sedexglobal.com/ethical-audits/smeta/> for additional details on the SEDEX Members Ethical Trade Audit and to review the following documents:

- SMETA Best Practice Guidance
- SMETA Measurement Criteria
- SMETA Report
- SMETA Corrective Action Plan

Appendix

[Appendix 1: P&G Human Rights Policy Statement](#)

[Appendix 2: Sustainability Guidelines for External Business Partners](#)

[Appendix 3: Social Sustainability Audit Process Steps and Auditor Responsibilities](#)

Appendix 1: P&G Human Rights Policy Statement

P&G Human Rights Policy Statement

Throughout our history of more than 175 years, our business has grown and changed but our fundamental values, which are known by our customers, consumers, employees and external business partners, have endured. This reputation of trust and integrity, built over time and rebuilt every day, is what sets us apart. Our **Purpose, Values and Principles** (PVPs), are the foundation of our Company.

Respect and Compliance

At P&G, respect for Human Rights is fundamental to the way we manage our business. We support the **U.N. Guiding Principles for Business and Human Rights** which respects and honors the principles of internationally recognized human rights consisting of:

- Those rights expressed in the **International Bill of Human Rights** (i.e., **Universal Declaration of Human Rights** and the **International Covenants on Economic, Social and Cultural Rights** and **Civil & Political Rights**.) and
- The principles concerning fundamental rights as set out in the **International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work**.

We recognize that it is the sovereign state's duty to protect against human rights abuses by establishing and upholding appropriate laws and policies. We comply with all laws applicable to our operations around the world. We also recognize that some states do not have adequate legal and regulatory frameworks, enforcement mechanisms, or have laws that conflict with these internationally recognized human rights. Wherever this is the case, P&G will always try to do the right thing by respecting human rights consistently across our global operations. We expect these same commitments to be shared by our business partners and we strongly encourage our business partners to share these same expectations with their suppliers.

Respecting Our Employees – At P&G, we strive to promote a work environment of confidence and trust. Our commitment to our employees includes our **Employee Rights Policy** which upholds our PVPs and respects International Labor Standards. Our **Worldwide Business Conduct Manual** provides employees with clear guidance on specific situations they may face and directs them where to go when they have questions or concerns. Our employees hold themselves and one another accountable for operating with trust and integrity, for stepping up as leaders and owners of the business and for competing honorably with a passion to win. P&G is committed to creating a work environment that fosters open communication and supports employees in reporting potential violations. Retaliation of any kind is inconsistent with our values of integrity and trust and simply will not be tolerated.

Respecting Our Consumers – P&G’s purpose “to provide branded products and services of superior quality and value that improve the lives of the world’s consumers, now and for generations to come” inspires everything we do and inspires our human rights policy. This purpose guides our strategic choices, leads to bigger and better innovation, drives brilliant execution, and compels us to operate responsibly and ethically, as we create products and services that improve people’s lives. Our respect for the human rights of our consumers includes our commitments addressed in our [Product Safety policy](#), Product Quality program and [Privacy policy](#).

Respecting Our Communities – P&G has a long-standing reputation of being a good corporate citizen and neighbor in all the places around the world where we do business. We respect the human rights of all persons in the communities in which we conduct business as well as recognize that we must be responsible for environmental stewardship and using resources wisely. Our commitments to these communities are addressed in our [Environmental Quality, Water, Sustainable Forestry, Wood Pulp and Palm Oil](#) policies. We strive to be socially responsible in the use of Company resources for the long-term benefit of society. P&G actively supports our employee efforts to make a difference in their local communities. We are particularly committed to improving the lives of children in need around the world, including working to prevent childhood disease. We support the arts and education. We lend a hand to those in need, and provide help when disaster strikes.

Commitment to our Supply Chain – Our [Business Partner Guidelines](#) establish clear expectations of our direct business partners, including an expectation to respect internationally recognized human rights, comply with all applicable laws and conduct their business ethically and responsibly. We will not knowingly condone or contribute to adverse human rights impacts caused by the actions of our business partners. When we become aware of an adverse impact, we will engage to be part of the solution to address the issue or dilemma, including seeking to prevent or mitigate the adverse impact.

Due Diligence, Remediation and Communication – We work to promote sustainable practices, support value creation and assess both actual and potential human rights adverse impacts in our direct operations as well as our supply chain. We strive to implement and improve systems in business relationships across our supply chain in order to mitigate the risk for impacted rights holders. We openly engage with our business partners, social partners and other stakeholders to identify areas of concern and develop solutions where there are risks of infringements.

Engaging Stakeholders and Human Rights Experts – We acknowledge that respecting human rights is an enormous challenge and progress will be made through a journey of collaboration and engagement with our stakeholders. Thus we seek meaningful consultation with important external stakeholders, including critics and recognized human rights thought leaders. We strive to work cooperatively with governments and civil society organizations to make progress in addressing issues. We seek to understand the nature and context of the evolving human rights journey and how we can make a difference.

Appendix 2: Sustainability Guidelines for External Business Partners

(PDF and translations available on www.pgsupplier.com)

Sustainability Guidelines for External Business Partners (May 2014)

Legal Compliance

External business partners must follow the law at all times. External business partners and their employees must ensure they understand how these standards and the law apply to their work on behalf of P&G. No external business partner has the authority to require or request that any of their employees or anyone else to violate these standards or any law or regulation.

Human Rights

P&G respects internationally recognized human rights as defined by the Universal Declaration of Human Rights and Associated Covenants, and the International Labor Organization (ILO) Declaration on the Fundamental Principles and Rights at Work. We expect our external business partners to respect these internationally recognized human rights. In our business award decisions, we will continue to place substantial value upon incumbent and potential external business partners who consistently respect these human rights. Our commitments to human rights are detailed in our [Human Rights Policy Statement and Social Policies & Statements](#).

Child Labor

P&G's external business partners will not use child labor. The term child refers to a person younger than 15 (or 14 where local law allows) or, if higher, the local legal minimum age for employment or the age for completing compulsory education. P&G prohibits assigning young workers (i.e., under 18 years of age or as defined by local law) to hazardous work based on age limits and types of work (e.g., night work) defined by local law.

Forced Labor, Human Trafficking, & Employment Eligibility

Employment must be voluntarily and freely chosen. External business partners including recruitment agencies must verify the legal employment eligibility of employees to work. External business partners including recruitment agencies must not use prison labor, indentured or bonded labor, human trafficking, or modern day slavery. External business partners must never use corporal punishment or other forms of mental and/or physical coercion. External business partner employees should not be required to lodge deposits or identity papers, or to pay recruitment fees, and should be free to leave their employee after reasonable notice. P&G expects those recruitment agencies that work for P&G to train their employees who are assigned to work on the P&G account to ensure they understand these requirements.

Wages and Hours

External business partners must comply with all applicable wage and hour laws, including minimum wage, overtime, maximum hour rules, meal and rest periods, and to provide legally mandated benefits. Where local industry standards exceed applicable legal requirement, external business partners are encouraged to provide wages that meet the higher local industry standards.

Coercion, Harassment and Discipline

P&G expects its external business partners to treat their employees with dignity and respect. External business partners are expected to have systems in place to prevent, detect, and resolve unacceptable worker treatment such as harassment, inappropriate use of discipline, discrimination, physical or mental punishment, or other forms of intimidation or abuse (e.g., physical abuse, threat of abuse, sexual or other harassment, verbal abuse, any type of corporal punishment, or other forms of mental and/or physical coercion as a form of discipline).

Discrimination

Discrimination based on race, color, gender, age, national origin, religion, sexual orientation, gender identity and expression, marital status, citizenship, disability, veteran status, medical condition (e.g., HIV/AIDS status, pregnancy, etc.), or any other legally protected factor will not be tolerated. External business partners must not discriminate in their hiring and employment practices (e.g., pay/promotion) and must follow all employment laws. Employment decisions must be based on merit, skills, and work experiences.

Health & Safety

External business partners must comply with all applicable health and safety laws, rules, regulations and industry standards. We expect our external business partners to be committed to and support the improvement of the health and safety of their operations, employees and the surrounding community. Our external business partners are expected to take all reasonable and necessary actions to prevent accidents and injuries, analyze and minimize health and safety risk exposure, protect their physical assets, ensure business continuity and engender public trust. If a question arises relating to the industry standards for key ingredients, contact your P&G Purchases representative.

Environmental Sustainability

External business partners must comply with all applicable environmental laws, rules and regulations. P&G recognizes that we must be responsible for environmental stewardship and using resources wisely. We strive to be socially responsible in the use of Company resources for the long-term benefit of society. Our commitments to environmental sustainability are addressed in our [Environmental Policies & Statements](#). External business partners are expected to share P&G's commitments and maximize the value and quality of their products by using resources responsibly, preserving the environment and reducing the environmental footprint of their operations. P&G will identify and notify external business partners that will be required to use and submit the scorecard or designated equivalent on-line tool to track improvement on environmental sustainability metrics. All other external business partners are encouraged to use the scorecard for their internal use if applicable. Click [here](#) for information and training materials on the Supply Chain Environmental Sustainability Scorecard.

Freedom of Association and Collective Bargaining

External business partners must respect their employees' right to choose to join or not to join a trade union, or to have recognized employee representation in accordance with local law. External business partners are expected to maintain constructive dialogue and negotiate in good faith with such representatives. External business partners shall not harass, discriminate against, or otherwise penalize workers, worker representatives, or trade union members because of their interest and/or membership in, or affiliation with, a trade union, or their legitimate trade union activity, in accordance with international labor standards.

Preventing Bribery and Corruption

External business partners must conduct business with integrity and in full compliance with the law. External business partners must not give, agree to give, offer, or receive anything of value to influence the behavior of another business partner or government official in order to obtain an improper benefit or advantage. Government officials include government employees (including employees at government-controlled or owned entities, such as hospitals, and energy and media outlets in certain countries), elected officials, political party officials, or candidates for public office or for a political party. External business partners must not make "facilitating payments," which are small payments (or "tips") to individual government officials to expedite routine government actions.

Gifts, Entertainment and Gratuities

External business partners are expected to respect and comply with our policy on gifts, entertainment, and gratuities. P&G's policy generally prohibits receiving gifts, entertainment or other gratuities from people with whom P&G does business and is not acceptable, because doing so could imply an obligation on the part of the Company and potentially pose a conflict of interest.

Employee & Data Privacy

External business partners must respect the privacy of their employees as well as those whose personal data P&G entrusts with them to provide products or services. P&G expects external business partners to properly protect and use personally-identifiable information. P&G expects that all external business partners will train their employees and subcontractors' employees assigned to work on the P&G account to ensure they understand the requirements and their personal responsibilities for protecting P&G personal information and as well as all P&G information.

Our Privacy goal at P&G is to protect, collect and use personal information only for the purpose for which it was provided. We do not trade, sell or lease personal information entrusted to us. A complete statement of P&G's privacy policy may be found at http://www.pg.com/privacy/english/privacy_statement.shtml.

Personnel & Facility Security

External business partners will comply with all applicable laws related to General Conduct, Apprehension/Detention of personnel as it relates to their duties as a security provider. External business partners must ensure that all persons are treated humanely, respect their dignity and privacy, prohibit torture or other cruel inhumane or degrading treatment, sexual exploitation and abuse or violation or discrimination. External business partners will train their employees on these and other legal requirements.

The P&G Worldwide Business Conduct Helpline

We encourage external business partners and employees of external business partners working on P&G's business to report any violations of P&G Policy or the law. Reports can be made to P&G directly by any of the following means:

The P&G Worldwide Business Conduct Helpline is a toll-free number you can call 24 hours a day, seven days a week, to report any serious concerns.

- Dial +1-800-683-3738 (if you are located in the United States, Canada or Puerto Rico)
- Dial country code 01 and then call collect at 704-544-7434 (in any other location)

The P&G Worldwide Business Conduct Helpline is staffed by an independent company and can take calls in most languages. P&G will not attempt to trace your identity. When calling the P&G Worldwide Business Conduct Helpline, you can report actual or suspected violations anonymously, where allowed by local law. Please keep in mind, however, that it may sometimes be more difficult or even impossible for P&G to thoroughly investigate reports that are made anonymously. You are therefore encouraged to share your identity when making a report via the P&G Worldwide Business Conduct Helpline. Protecting the identity of innocent people and preventing retaliation for people who make reports in good faith are a priority for our Company.

The P&G Ethics and Compliance Committee

P&G Ethics & Compliance Committee consists of the Chief Executive Officer, the Chief Financial Officer, the Chief Legal Officer, and the Global Human Resources Officer.

- Email: **ethicscommittee.im@pg.com**
- Send mail to: The Procter & Gamble Company Ethics & Compliance Committee
One Procter & Gamble Plaza (C-11)
Cincinnati, OH 45202

The P&G Corporate Secretary

- Email: **corpsecretary.im@pg.com**
- Send mail to: The Procter & Gamble Company Corporate Secretary,
One Procter & Gamble Plaza (C-11)
Cincinnati, OH 45202

Appendix 3: Social Sustainability Audit Process Steps and Auditor Responsibilities

<u>Supplier Steps</u>	<u>SGS (or approved alternate auditor*) Steps</u>	<u>Sedex System</u>
Sedex Registration		
Register in Sedex		Supplier ZS# codes are generated immediately
Add audit site to Sedex		
Send Link invitation in Sedex to P&G Subsidiary		Link invitation goes to P&G and is accepted
After link is accepted, Click "allow access" in Sedex for audit site and audit report		P&G subsidiary allowed access to audit report
Complete Supplier Assessment Questionnaire in Sedex		SAQ completed
Audit Scheduling		
Contact SGS (or approved alternate auditor) to schedule audit	Provide questionnaire to be completed by supplier before scheduling	
Complete auditor questionnaire	SGS offers dates and proposed pricing agreement within 10 business days of receiving completed questionnaire	
Agree on date, and complete agreement, pay auditor invoice	Confirm audit date.	
Communicate Audit date to P&G (if auditor other than SGS)	SGS provides audit date to P&G on tracking report	
Create audit # and communicate to Auditor		
Audit Planning & Execution		
Provide S# & P# to auditor in pre-audit paperwork or at opening meeting of audit	Send Pre-audit planning documents	
Create audit # in Sedex (preferred approach-enables auto-publish)		Audit # generated immediately and used by SGS to upload audit

Host auditor and allow them to view all required materials and locations	Perform audit	
Receive Corrective Action Plan Report at close of audit	Provide Corrective Action Plan Report to supplier at close of audit Notify P&G of any critical issues	
Ensure audit is uploaded into Sedex by auditor	SGS uploads Audit Report & Corrective Action Plan Report (CAPR) to Sedex after 20 business days (if ZS# was provided).	Audit Report and CAPR uploaded within 20 business days. Audit will self-publish and be viewable by P&G if Audit # was created by supplier prior to audit date.
If audit # wasn't created prior to audit, supplier must "publish" audit in Sedex for Customers to view		Audit and CAPR Published and is viewable by P&G
Non-compliance Remediation		
Enter Corrective Actions in Sedex for Critical and Major NC's within 90 days from audit date.		Corrective Actions in Sedex
Alert auditor when the Corrective actions are available in Sedex for verification.	For "Desktop" follow up assigned to NC's - Auditor verifies NC's in Sedex if acceptable within 10 business days from desktop due date (90 days from audit)	Desktop audit NC's verified within 10 business days of desktop due date (90 days from audit)
Schedule and perform a follow up audit (if required) within 90 days of the audit to verify the Corrective Actions are acceptable (follow audit scheduling process above).	Schedule and perform a follow up audit (if required) within 90 days of the audit to verify the Corrective Actions are acceptable (follow audit scheduling process above).	
Create audit # in Sedex (preferred approach-enables auto-publish)		Audit # generated immediately and used by SGS to upload audit
Ensure follow up audit is uploaded into Sedex by auditor	SGS uploads follow up Audit Report & CAPR to Sedex after 20 business days from audit.	Audit Report and CAPR uploaded and NC's verified within 20 business days from audit
If audit # wasn't created prior to audit, supplier must "publish" audit in Sedex for Customers to view		Audit and CAPR Published and is viewable by P&G

* Suppliers will need to ensure auditors other than SGS follow the required steps

Sustainability Compliance Guide

for External Business Partners



Touching lives, improving life. **P&G**™

