PRI Principles for Responsible Investment

PRI PROCUREMENT POLICY

Approved: June 2019 by the PRI Association Board

The policy provides the basis for the PRI Association and its subsidiaries ('the PRI') to provide best value to its signatories, stakeholders and the wider community in the purchasing and provision of goods and services.

1. PURPOSE

1.1. This document establishes the framework under which procurement takes place and is to be applied by all staff and company directors.

2. PURCHASING GUIDELINES

- 2.1 All purchasing of goods or engagement of services must comply with applicable laws and regulations. Such laws and guidelines include human rights, environmental, employment, health and safety, anti-tax avoidance and anti-corruption regulations.
- 2.2 All processes relating to PRI purchases will be fair, unbiased, transparent and aim to attract the widest and diverse pool of applicants as possible and appropriate.
- 2.3 Selection should be based on transparent and objective criteria, free from personal interests, biases, or other untoward or political influences.
- 2.4 Procurement should be consistent with the PRI's mission, purpose and values.
- 2.5 Responsible persons should not disclose information that confers unfair advantage or financial benefit or detriment on a supplier or potential supplier.
- 2.6 Responsible persons should not engage in any activity that would create a conflict of interest.
- 2.7 Responsible persons must ensure that appropriate records are kept as complete and accurate as possible, and timely kept.

3. THRESHOLD

- 3.1 The expenditure threshold is in relation to the entirety of the procurement, including any options, extensions or variations to the initial procurement. The expenditure limits are meant to ensure the proper use of procurement processes to obtain the best and most cost-effective procurement to meet the PRI's need.
- 3.2 Artificial splitting of contracts or projects in order to avoid the implications of another procurement process category is prohibited.

4 UP TO £25,000

- 4.1 There is no formal bid process, however procurement must:
 - 4.1.1 comply with the above purchasing guidelines,
 - 4.1.2 be within budget and
 - 4.1.3 be approved by a *Head of Department* or above.
- 4.2 Unless a C-Suite, the approver should be senior to the individual proposing the procurement.



5 INCLUDING AND IN EXCESS OF £25,000

- 5.1 Call for bids should be open, well-advertised and posted for a minimum period of 10 working days on the PRI website.
- 5.2 In some cases, a more targeted approach (whereby a few possible applicants are directly contacted) may be required, especially in cases of genuine time or source constraints.
- 5.3 Exemptions to an open call for bids must be authorised at C Suite level and the reason documented for audit.
- 5.4 A summary of offers received shall be presented by the person responsible to the *Chief Financial Officer* for final approval with the following details:
 - 5.4.1 the bid process, including details of publication;
 - 5.4.2 the approved budget allocation and
 - 5.4.3 a recommendation as to the preferred supplier signed off at *C*-Suite level.

6 ACCOUNTABILITY

- 6.1 For procurement under the threshold, Finance will maintain a file of invoices and their authorisation available for audit.
- 6.2 In addition to the above, for procurements in excess of the threshold, an audit trail needs to be maintained in central repository. This will include the why, how and approval process together with a completion review.

7 REVIEW

7.1 The policy will be reviewed annually by the PRI Board's Finance, Audit and Risk committee.

