

Period covered by this Communication on Progress (COP)

From: November 15, 2013

To: November 15, 2014

Statement of Continued Support for the Global Compact

November 6, 2014

To our stakeholders:

I am pleased to confirm that Athena Global Advisors reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labor, 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.

Sincerely yours,

Margaret Wilkinson CEO Athena Global Advisors, Inc.



UNITED NATIONS GLOBAL COMPACT - HUMAN RIGHTS PRINCIPLES

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2: make sure that they are not complicit in human rights abuses

Assessment, Policy and Goals

"At Athena Global Advisors, our goal is to encourage that our employees and all our business partners respect human rights and prevent potential abuses. Our commitment is memorialized in our written policies found in our employee handbook and code of ethics and business conduct."

Implementation

"Athena Global Advisors' commitment to protecting human rights spans how we treat our employees, our expectations of our consultants and how we make a sustainable impact in the communities where we live and work. The respect and protection of human rights are at the heart of our core values and anchored in our policies and procedures supporting human rights. Our Chief Operating Officer is responsible for receiving and reviewing all employee and client issues related to unfair treatment. Should any such issues arise; the COO addresses it immediately for resolution."

Measurement of outcomes

"Athena Global Advisors will audit and evaluate all partners and consultants against a set of defined principles, policies and guidelines. Any contravention of human rights will be documented and the responsible partner will be placed on probation and given a timeframe to address and resolve the issue. Continued non-compliance will result in the partner relationship being terminated. Senior management will audit consultants annually without any warning to ensure that they are working within the defined guidelines of human rights."



UNITED NATIONS GLOBAL COMPACT - LABOR PRINCIPLES

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labor; Principle 5: the effective abolition of child labor; and

Principle 6: the elimination of discrimination in respect of employment and occupation

Assessment, Policy and Goals

"Athena Global Advisors prides itself on having an authentically diverse culture: our workforce spans countries, cultures, languages, generations, perspectives, backgrounds and educational experiences. Our company handbook covers policies concerning our employee rights and compensation and responsibilities. We assess labor related risks. We will continue to refine our employee handbook as needed and incorporate the Global Compact."

Implementation

"All employees are entitled to medical insurance. All employees are encouraged to exercise and live a healthy lifestyle. To improve the quality of life of employees and their families, they are permitted to work from home and encouraged to take all their annual paid time off. In addition, we have an annual offsite retreat to bring employees and consultants together to strategize company wellness and build rapport in a relaxed atmosphere."

Measurement of outcomes

"We are a women-owned business and continue to focus on increasing the representation of women in our workforce, as well as diversification of talents and backgrounds within the company. Our diverse workforce spans countries, cultures, languages, generations, perspectives, backgrounds and educational experiences."



UNITED NATIONS GLOBAL COMPACT - ENVIRONMENTAL PRINCIPLES

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies

Assessment, Policy and Goals

"Athena Global Advisors ensures sustainable growth from how we run our business and the services we provide our clients, as well as how we engage with our employees and consultants. We recognize the promise, usefulness, and need for environmentally friendly technologies. The company is committed to purchasing them when economically viable, and communicating their utility and environmental benefits."

Implementation

"We utilize our numerous communications tools (ie: video and tele-conferencing, instant messaging, screen share, online message boards, and virtual file rooms) to reduce the need to travel to locations for meetings allowing our employees, consultants and clients to interact as if they are in the same office."

Measurement of outcomes

"Our travel costs have decreased significantly by requiring virtual communications assessment before scheduling physical meetings with our team and clients. We continually assess our need for travel and our communications network to ensure our goals are in line and on track."



UNITED NATIONS GLOBAL COMPACT - ANTI-CORRUPTION PRINCIPLES

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Assessment, Policy and Goals

"Athena Global Advisors is committed to maintaining the highest ethical standards and to complying with all anticorruption laws where we operate. This is a key component and critical to our success as a company as we help other companies around the world comply with anticorruption laws and regulations. Our commitment is reflected in our internal policies and code of ethics and business conduct. We have a zero tolerance policy for bribery or any other activity that violates anticorruption laws."

Implementation

"We perform routine risk assessments of our business operations and make relevant changes to our compliance program. Our compliance program is systemically stress tested to identify weaknesses and areas for improvement. We provide anti-bribery and corruption training to our employees and consultants. We practice what we preach and apply the same level of care for our clients operations around the globe."

Measurement of outcomes

"We are subject matter experts in anticorruption and are asked to participate in education and training sessions around the world. We have hosted and provided webinars and other similar in person seminars free of charge to interested parties where we discuss varying aspects of anticorruption issues and how to proactively prevent and mitigate such issues from surfacing. We have been published and interviewed by numerous editors on the subject with the goal of educating companies and individuals of their anticorruption risks."