

NATHAN

Trusted for Excellence



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ABOUT NATHAN

Nathan is a private international economic and analytics consulting firm that works with government and commercial clients around the globe to deliver practical solutions and achieve lasting results. Whether building frameworks for economic growth or navigating regulatory hurdles, securing infrastructure financing or evaluating and assessing disputes, Nathan's experts serve as trusted partners, offering clients the analysis, technical advice, and strategies they need for sound decision-making. Known for both technical and service excellence and with corporate offices in the US, London, and India and more than 40 program offices around the world. More information about Nathan can be found at nathaninc.com

STATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER

2nd December 2018

As a member of the United Nations Global Compact, Nathan Associates strongly supports this instrumental corporate sustainability initiative. This document is the first annual Communication on Progress report from Nathan Associates and I would like to confirm our continued commitment to the Compact's 10 principles in the areas of Human Rights, Labour, Environment and Anti-Corruption.

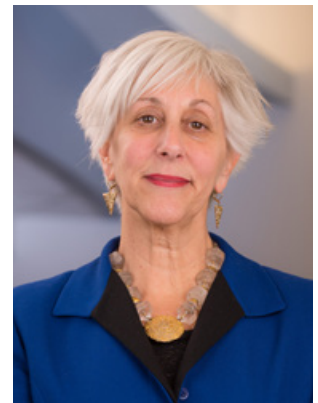
Nathan Associates is an international private consulting firm that delivers sound, and defensible analytic and economic solutions and analyses for government and commercial clients around the world. For almost 75 years, clients have relied on Nathan Associates to handle complex, high-stakes assignments, and provide exceptional value while maintaining the highest standards of integrity and legality.

In this report, we provide a summary of 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 sharing this information with any interested party.



Susan Chodakewitz

President & Chief Executive Officer
Nathan Associates



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SECTION 1: HUMAN RIGHTS

Principle 1:

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2:

make sure that they are not complicit in human rights abuses.

Nathan is fully committed to uphold human rights principles and frameworks, promoting and supporting human rights of employees, suppliers, partners and beneficiaries we work with, or come into contact. We are also absolutely committed to safeguarding people and ensuring that our actions do no harm.

Nathan is committed to conducting all of its affairs and activities with the highest standards of integrity and ethical conduct. Nathan embraces a culture in which employees are free and encouraged to speak up when they see behaviour that is not aligned with any of its policies including those related to human rights abuses.

Some of the policies and procedures that we have put in place that include principles 1 and 2 include:

- **Code of Business Conduct:** clearly sets out the standards of ethical behaviour for all employees, suppliers and partners.
- **Anti-Modern Slavery Policy:** sets out our policy to ensure as far as practical that our suppliers and partners are not involved in trafficking or modern slavery.
- **Safeguarding Policy:** set out our policy to ensure that women, children and the very poor are protected from physical abuse, emotional abuse, sexual abuse and neglect.

Nathan is fully committed to uphold human rights principles and frameworks, promoting and supporting human rights of employees, suppliers, partners and beneficiaries we work with, or come into contact.



MEASUREMENT OF OUTCOMES

- **Policy Review and Attestation:** All of Nathan's employees, suppliers and partners review and sign Nathan's Code of Business Conduct.
- **Compliance Training:** Nathan provides annual training and awareness raising sessions to ensure that all employees and suppliers understand the importance of respecting human rights in our work.
- **Due Diligence Systems:** Vetting and due diligence process highlights and communicates risks related to human rights.
- **Reporting:** Employees can report their concerns to their manager, Human Resources or anyone in management. Nathan also has a Global Hotline, that is operated by a third-party, for employees, suppliers and partners to report a concern or a claim confidentially, 24 hours a day, seven days a week.



SECTION 2: LABOUR STANDARDS

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 labour;

Principle 5:

the effective abolition of child labour; and

Principle 6:

the elimination of discrimination in respect of employment and occupation

Nathan is fully committed to ensuring a safe and trusted environment for our employees, suppliers, partners and beneficiaries. This commitment includes our aim to tackle the issues of forced labour and modern slavery as detailed in Nathan's Business Code of Conduct, Anti-Modern Slavery Policy and Safeguarding Policy, amongst others. More specifically:

- All firms that are part of our supply chain are provided with contracts and must review the policy and sign the attestation for the Business Code of Conduct, which Nathan is able to audit at any time for compliance.
- All employees are made aware of company policies through an Employee Handbook, setting out their rights, responsibilities and benefits, and the need to take an online Ethics Training.

Nathan's policies related to labour practices include:

- **Diversity and Equal Employment:** Nathan has adopted a formal Equality and Diversity Policy to ensure employees, contractors, associates and applicants are treated equally. Nathan recruits, in all job areas, without discriminating against on grounds of their age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage & civil partnership, or pregnancy/maternity status.

Nathan is fully committed to ensuring a safe and trusted environment for our employees, suppliers, partners and beneficiaries.

- **Harassment in the Workplace:** Nathan prohibits harassment of one employee by another employee, manager or third party. Harassment is conduct that has the purpose or effect of creating an intimidating, hostile, or offensive work environment and unreasonably interfering with an individual's work performance. Harassment may consist of verbal, physical, visual or sexual harassment; it may include retaliation for reporting harassment or threatening to report harassment.
- **Commitment to Non-retaliation:** Nathan prohibits any form of retaliation against an employee, supplier, or partner who files a complaint, in good faith, or participates in an investigation regarding a violation of Nathan's Code of Conduct or any other policy. Nathan will not tolerate any harassment, retaliation or reprisals of any kind.

MEASUREMENT OF OUTCOMES

- **Compliance Training:** Training and awareness raising takes place to ensure that employees, suppliers and partners understand what modern slavery is in our work.
- **Reporting:** Ensuring that our reporting procedures of any contraventions to our labour standards are clear, can be made easily and with confidence, and are dealt in an effective manner. This also includes that claims can be made in Nathan's Global Hotline (available 24 hours, seven days a week) related to principles three, four, five and six of the UN Global Compact.





SECTION 3: ENVIRONMENT

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

Nathan has an Environmental Policy in place which is communicated through our Business Code of Conduct and Vetting and Due Diligence procedures. We maintain a policy of “minimum waste” and recycling, which is essential to the cost-effective and efficient running of our operations. Our staff and all those who work for us are expected to promote this policy by minimising printing, collecting and recycling office paper, or avoiding use of disposable products.

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

Nathan is committed to:

- Meet relevant environmental legislation
- Integrate sustainable practices into our operations
- Progressively implement an environmental management system
- Raise awareness of the issues and our policies amongst employees, suppliers and partners.

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

MEASUREMENT OF OUTCOMES

- **Company Communication:** Regular communications around energy and waste management provided to all staff (e.g. recycling audit results).
- **Employee Participation:** Continuous involvement of our Office Managers in improving the environmental footprint in our offices.



SECTION 4: ANTI-CORRUPTION

Principle 10:
Businesses should work against all forms of corruption, including extortion and bribery

Nathan has a zero tolerance on bribery and corruption. Nathan will conduct its business in an honest and ethical manner. Nathan's Anti-Bribery Policy represents our commitment to conduct operations ethically and in compliance with applicable anticorruption laws and regulations in jurisdictions in which it operates.

Nathan does not tolerate corruption in any form, whether directly or indirectly. Corruption causes poverty, inhibits economic growth, is damaging to businesses, and may result in criminal and civil liability and penalties for any personnel or person working on behalf of Nathan.

Nathan has several policies and procedures in place which cover Anti-Corruption:

- **Code of Business Conduct:** clearly sets out the standards of ethical behaviour for all employees, suppliers and partners.
- **Anti-Bribery Policy:** sets out conduct operations ethically and in compliance with applicable anticorruption laws and regulations
- **Whistleblowing Policy:** provides clear procedures for reporting and ensuring that all employees, suppliers and partners are able to speak up in confidence any concerns they might have.
- **Vetting and Due Diligence Policy:** set out our due diligence procedures, including managing conflict of interests (which could be potentially perceived as fraud, bribery or corruption).

Nathan has a zero tolerance on bribery and corruption. Nathan will conduct its business in an honest and ethical manner.



MEASUREMENT OF OUTCOMES

- **Compliance Training:** Training of Nathan staff on the company's ethical approach so that everyone understands what corruption is and how to report it.
- **Reporting:** Ensuring that our reporting and whistleblowing procedures allows for claims of employees, suppliers, partners and beneficiaries related to fraud, bribery and corruption to be dealt with in an effective manner. This also includes ensuring that Nathan's Global Hotline is available to report on claims related to principle ten of the UN Global Compact 24 hours a day, seven days a week, anywhere in the world.