

# NATHAN

Trusted for Excellence



## UNITED NATIONS GLOBAL COMPACT Communication on Progress (COP) 2020

---

Nathan Associates  
December 2020

# Contents

Statement of Continued Support by the Chief Executive Officer	3
Human Rights	4
Labor Standards	7
Environment	10
Anti-Corruption	11

## 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](http://nathaninc.com)

## STATEMENT OF CONTINUED SUPPORT BY THE CHIEF EXECUTIVE OFFICER

12th December 2020

As a member of the United Nations Global Compact, Nathan Associates strongly supports this corporate sustainability initiative. This document represents Nathan's third annual Communication on Progress report. I am proud of our accomplishments to date and our continued commitment to the Compact's 10 principles in the areas of Human Rights, Labor, 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 ethics.

We will leverage our successes and continue to focus on the integration of the Global Compact and its principles into our business strategy, culture, and daily operations. In this report, we provide a summary of the key actions undertaken in 2020. We also commit to sharing this information with interested parties.



A handwritten signature in dark ink, reading "Susan B. Chodakewitz", with a large, elegant loop at the end.

**Susan Chodakewitz**

President & Chief Executive Officer  
Nathan Associates

**NATHAN**

Trusted for Excellence



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

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

These commitments are set out in a range of corporate policies and guidelines, including:

- **Code of Business Conduct:** establishes the standards of ethical behavior for all employees, suppliers, and partners.
- **Equality and Diversity Policy:** establishes our commitment to providing a work environment where all individuals are treated with respect and dignity. We embrace diversity of identity, experience, and thought, and actively strive for inclusive behaviors across our company and our work.
- **Anti-Modern Slavery Policy:** defines our zero-tolerance approach to any form of modern slavery for all employees, suppliers, and partners.
- **Safeguarding Policy:** describes our commitment to the safety and protection of all children and vulnerable adults from physical abuse, emotional abuse, sexual abuse, and neglect.



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



- **Whistleblowing:** guides our employees, suppliers, partners, and associates on how they can speak up and confidentially report any suspicions or concerns they may have.
- **Data Protection Policy:** aligns our policies and processes with data protection legislation, including the General Data Protection Regulation (GDPR).

### PROGRESS TO DATE

Nathan continues to improve the integration of Principles 1 and 2 in our work. This year, we reviewed our Code of Business Conduct so that it remains timely and relevant.

Globally, we demonstrated the following accomplishments, which included:

- Implementing a global policy that governs the adoption of best health and safety practices for all Nathan offices to help mitigate the threat posed by COVID-19.
- Establishing a partnership with International SOS, the world's largest health and security services firm, to provide guidance and to protect our global workforce from health and security threats.
- Updating our Affirmative Action planning and increasing distribution of Nathan's job postings to diverse job boards including colleges and universities with historically higher numbers of black and ethnic minority students.
- Ensuring our recruiters have undergone unconscious bias training to reduce bias in the recruitment process.
- Recognizing Juneteenth in the US as a holiday starting in June 2021.

Our London office demonstrated additional accomplishments, which included:

Nathan applies the highest standards of integrity and ethic conduct to all its affairs and activities.

- Delivering Safeguarding Investigation Management training for key senior employees.
- Appointing an Equality and Diversity Champion to drive the implementation of the Equality and Diversity policy to hold Nathan staff and Senior Leadership accountable.
- Developing an annual scorecard to monitor the effectiveness of a diverse and inclusive workplace.
- Celebrating Cultural Awareness Day to recognize our diverse and vibrant workforce.
- Establishing an employee interest group to provide programming, training and learning, and development to mitigate racism and to promote racial equality in the workplace and in the international development sector. Some of the initiatives rolled out so far include:
  - Assessing implicit bias to raise awareness of individual unconscious biases.
  - Facilitating diversity discussions in an inclusive space where all staff can communicate and engage in an open dialogue.
  - Developing learning and development opportunities by providing programming and books to support employees' self-education on issues related to racial inequality and white privilege.

### MEASUREMENT OF OUTCOMES

- **Policy Review and Attestation:** All of Nathan's employees, suppliers and partners reviewed and signed Nathan's Code of Business Conduct.
- **Compliance Training:** All of Nathan's employees received training on the Code of Business Conduct.
- **Reporting:** In 2020, there were no reports made to Nathan's Global Hotline of human rights incidents. Nathan did not identify any incidents of employees or subcontractors causing or contributing to human rights violations.





## SECTION 2: LABOR 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 labor;

### **Principle 5:**

the effective abolition of child labor, and

### **Principle 6:**

the elimination of discrimination in respect of employment and occupation.

Nathan has a responsibility to ensure a safe and trusted environment for our employees, suppliers, partners and beneficiaries. This includes our aim to tackle the issues of forced labor and modern slavery as detailed in Nathan's Code of Business Conduct and Anti-Modern Slavery Policy. 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 Nathan's Code of Business Conduct, which Nathan is able to audit at any time for compliance.
- All employees are made aware of company policies, setting out their rights, responsibilities and benefits, and the need to take an online Ethics training.

Nathan's policies related to labor practices include provisions relating to:

**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 regard to age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, or pregnancy/maternity status.

**Harassment in the Workplace:** Nathan prohibits harassment of any employee by another employee, manager, or third party. Harassment is conduct that has the purpose or effect of creating an intimidating,



Nathan has adopted a formal Equality and Diversity Policy to ensure employees, contractors, associates, and applicants are treated equally.



hostile, or offensive work environment and unreasonably interfering with an individual's work performance. Harassment may consist of verbal, physical, visual, or sexual harassment and may also 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 Business Conduct or any other policy. Nathan will not tolerate any harassment, retaliation, or reprisals of any kind.

### **PROGRESS TO DATE**

In 2020, Nathan continued to consistently improve the integration of the four Principles related to Labor Standards. Accomplishments included:

- Refining further the performance management system to ensure that it is applicable across all of our offices.
- Renewing our commitment to putting in place effective systems and safeguards against any form of modern slavery or human trafficking taking place in our business or our supply chains.
- Including anti-trafficking clauses within all US government contracts and adhering to them.
- Revising our recruitment codes to improve the accuracy and transparency of recruitment data.

Our London Office reported further progress, including:

- Undertaking a baseline to collect data against a range of equity indicators which will be used to provide transparency on firm level diversity statistics and for monitoring the effectiveness of equitable recruitment and talent management practices.



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 policies.

- Updating and rolling out Anti-Modern Day Slavery training for the London office and all new international development programs.

#### MEASUREMENT OF OUTCOMES

- **Compliance Training:** This year we required all employees to participate in training, which covered workplace harassment rules, regulations, and expectations.
- **Reporting:** Nathan has not received any complaints or concerns related to discrimination or Principles 3–6 of the UN Global Compact.
- **Human Capital Management:** Performance and salary evaluations are conducted annually. We achieved a 100% completion rate of the 2020 Annual Performance Review for employees across all of our offices.





## SECTION 3: ENVIRONMENT

### **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.

Nathan has an Environmental Policy in place which is communicated through the Code of Business Conduct and vetting and due diligence procedures. We maintain a policy of “minimum waste” and recycling. Our employees and all those who work for us are expected to promote this policy by minimizing printing, collecting and recycling office paper, or avoiding use of disposable products.

### **PROGRESS TO DATE**

Nathan continues to improve the way that we work in alignment with our Environmental Policy. Accomplishments this year included:

- Implementing globally environmentally-friendly technologies to enable remote working for employees and projects when they are unable to work in the office.
- Undertaking a Green Office assessment for our headquarters and London Office to assess the actual performance of the office against a range of environmental indicators. This will be used to inform the development of a Green Office action plan for the subsequent year.

### **MEASUREMENT OF OUTCOMES**

- **Legislative Compliance:** Nathan has not been served any fines or non-monetary sanctions for non-compliance with environmental laws and regulations.
- **Reporting:** Nathan has not received any complaints or concerns about potential or real environmental impacts resulting from Nathan’s work.
- **Supply Chain Management:** All UK supply partners are assessed in relation to their compliance with relevant environmental criteria prior to contracting.



## SECTION 4: ANTI-CORRUPTION

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

Nathan has a zero tolerance for 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 anti-corruption laws and regulations in jurisdictions in which Nathan 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:** establishes standards of ethical behavior for all employees, suppliers and partners.

**Anti-Bribery Policy:** presents our commitment to conduct operations ethically and in compliance with applicable anti-corruption laws and regulations.

**Whistleblowing:** guides our employees, suppliers, partners, and associates on how they are able to speak up and confidentially report any suspicions or concerns they may have. The Global Hotline is accessible to anyone anywhere in the world, 24 hours a day, 7 days a week.

**Vetting and Due Diligence Processes:** All employees, suppliers, and partners undergo a rigorous vetting and due diligence process prior to contracting.



Nathan has a zero tolerance policy for bribery and corruption.



This includes managing conflicts of interest and verification of compliance with tax obligations.

### **PROGRESS TO DATE**

Nathan continues to operate in a way which is consistent with the above mentioned policies and practices and upholds our commitment to Principle 10. This year, accomplishments included:

- Reviewing and strengthening of the Conflict of Interest Policy and procedures for managing of conflict of interest risk in International Development Programs.

### **MEASUREMENT OF OUTCOMES**

- **Compliance Training:** All employees completed Nathan Ethics training so that everyone understands what corruption is and how to report it.
- **Reporting:** No instances of fraud were reported to the Global Hotline.