

NATHAN

Trusted for Excellence



UNITED NATIONS GLOBAL COMPACT Communication on Progress (COP) 2021

Nathan Associates
December 2021

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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. Nathan is known for both technical and service excellence and has 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

16th December 2021

As a member of the United Nations Global Compact, Nathan Associates (Nathan) strongly supports this corporate sustainability initiative. This document represents Nathan's fourth 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 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 over 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 2021. We also commit to sharing this information with interested parties.



A handwritten signature in black ink that reads "Susan Chodakewitz". The signature is fluid and cursive, with a large loop at the end.

Susan Chodakewitz

President & Chief Executive Officer
Nathan Associates



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 behaviour 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 behaviour for all employees, suppliers, partners, and associates.
- **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 behaviours across our company and our work.
- **Reasonable Accommodation Policy:** establishes our commitment to a safe workplace that encourages efficient, productive, and creative work. It further defines our approach to promoting equality and diversity in our recruitment efforts.
- **Anti-Modern Slavery Policy:** defines our zero-tolerance approach to any form of modern slavery for all employees, suppliers, partners, and associates.
- **Modern Slavery and Human Trafficking Statement:** publicly states our commitment to no modern slavery or human trafficking in our supply chains or in any part of our business.

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.



- **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.
- **Whistleblowing Policy and Procedures:** 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 again reviewed and updated our Code of Business Conduct so that it remains timely and relevant.

Globally, we demonstrated the following accomplishments, which included:

- Regular reviews and adaptation of the global policy implemented in 2020 that governs the adoption of best health and safety practices for all Nathan offices to help mitigate the ongoing and changing threat posed by COVID-19.
- Developing and delivering two new training modules for all Nathan staff on (1) Disability, Discrimination and Accommodations; and (2) Diversity and Inclusion.
- 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.

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

Our London office demonstrated additional accomplishments, which included:

- Developing standard operating procedures and processes to govern safeguarding investigations, including establishing a committee to independently oversee any such investigations.
 - Adopted a new Mental Health, Stress and Wellbeing Policy to help establish, promote, and maintain the positive mental health and wellbeing of all Nathan staff through workplace policies and practices.
 - Driving the implementation of Nathan's Equality and Diversity Policy through the leadership of the Equality and Diversity Champion and Officer; helping to hold Nathan staff and Senior Leadership accountable.
 - Implementing the newly-developed annual scorecard to monitor the effectiveness of a diverse and inclusive workplace.
 - Celebrating Cultural Awareness Day to recognize our diverse and vibrant workforce.
 - Co-chairing the British Expertise Diversity & Inclusion Working Group in order to drive change in the sector by advocating for change with clients.
 - Engaging our 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 in 2021 include:
- Facilitating diversity discussions in an inclusive space where all staff can communicate and engage in an open dialogue.
 - Holding themed film and book reviews to discuss language used both in the company and in our sector in an attempt to make communication more inclusive.

MEASUREMENT OF OUTCOMES

- **Policy Review and Attestation:** All Nathan's employees, suppliers and partners reviewed and signed Nathan's Code of Business Conduct.
- **Compliance Training:** All Nathan's employees received training on the Code of Business Conduct.
- **Reporting:** In 2021, 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

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 on an annual basis.

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. This Equality and Diversity Policy is complemented by Nathan's affirmative action and reasonable accommodation policies and procedures.

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, 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.

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



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 2021, 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:

- Reviewing baseline 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.
- Delivering a new Diversity and Inclusion training module to all Nathan staff.
- Completing the UK Government's Modern Slavery Assessment Tool and updating our Anti-Modern Day Slavery policy based on the tool's recommendations.
- Updating and rolling out Anti-Modern Day Slavery training for the London office and all new international development programs.
- Conducting an extensive review and update of the due diligence checks used for partners.

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.

MEASUREMENT OF OUTCOMES

- **Compliance Training:** As in 2020, in 2021 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 2021 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 both 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:

- Continuing to implement 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 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.
- Initiating the development of a Carbon Reduction Plan for our London office which will measure the office’s current greenhouse gas emissions and set out a commitment to achieve Net Zero by at least 2050 for our UK operations.

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 corruption in all its forms, 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 and Anti-Fraud and Corruption Policy together represent 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.
- **Anti-Fraud and Corruption Policy:** represents our commitment to conduct operations ethically and in compliance with applicable laws and regulations. It sets out our stance on fraud and corruption and our approach to preventing, detecting, reporting and investigating fraud and corruption.
- **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. Nathan's independent 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. This includes managing conflicts of interest and verification of compliance with tax obligations.

Nathan has a zero tolerance policy for bribery and corruption.



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:

- Regularly reviewing and strengthening of the Conflict of Interest Policy and development of contextualized Conflict of Interest training materials for international development programs.
- Conducting an extensive review and update of the due diligence and vetting used by the London office, including strengthening the checks used to manage conflicts of interest and politically exposed persons and expanding our anti-corruption, fraud and bribery identification procedures.
- Holding interactive training for the London office team on our updated Anti-Bribery Policy and Anti-Fraud and Corruption Policy.

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.