



United Nations Global Compact

Communication on Engagement

December 2021

Creative Associates International

This report outlines Creative Associates International's activities in support of the United Nations Global Compact between the periods of July 2018 to December 2021.

PART I: STATEMENT OF CONTINUED SUPPORT BY CHIEF EXECUTIVE OFFICER

December 16, 2021

To our stakeholders:

I am pleased to confirm that Creative Associates International reaffirms its support to the United Nations Global Compact and its Ten Principles in the areas of Human Rights, Labor, Environment and Anti-Corruption. This is our Communication on Engagement with the United Nations Global Compact. We welcome feedback on its contents.

In this Communication of Engagement, we describe the actions that our organization has taken to support the UN Global Compact and its Principles as suggested for an organization like ours. We also commit to sharing this information with our stakeholders using our primary channels of communication.

Sincerely yours,



Leland Kruvant
President and CEO

PART II: DESCRIPTION OF ACTIVITIES

Creative Associates International (Creative) provides on-the-ground development services in the fields of education both in conflict and non-conflict situations, economic growth, workforce development, positive youth development, citizen security, governance, technology for development, and more. As a member of the UN Global Compact, Creative cherishes the ideals of “partnership in development” and strives to forge lasting partnerships with corporations and local organizations in more than 85 countries around the world in the spirit of equality, reciprocity, and based on shared values, goals, and vision. Creative is committed to upholding the Ten Principles of the UN Global Compact through our programs, strategic partnerships, and internal systems. Below is a description of our activities as they relate to the areas of human rights, labor, environment, and anti-corruption.

Human Rights

Core to our Corporate values and development efforts that we undertake across the many communities we partner with and serve is “respect for human rights”; promotion of the right of individuals irrespective of skin color, religion, disability, ethnicity or race, gender, sexual orientation, etc.) to live in dignity by responding to their fundamental economic needs, and social, and political rights. This is explicitly enshrined in its mission statement; “to support people around the world realize the positive change they seek.” Since 1977, Creative has worked in fragile and conflict-affected areas and has seen first-hand the detrimental impacts on individuals and communities when human rights are not upheld. Creative’s programs and policies reflect bedrock human rights principles, several of which are particularly relevant to the Compact.

The Compact’s “Children’s Rights and Business Principles” calls on members to meet their responsibility to respect and support children’s rights, including the right to education. Since its founding, Creative has been a leader in expanding quality basic education to children and youth around the world, often in conflict or post-conflict countries. In the USAID-funded **Northern Nigeria Education Initiative Plus** program, Creative supported the local ministries to improve access and quality of education for more than 1 million school-aged children and youth in two northern states of Nigeria. Creative’s **Afghan Children Read** program succeeded in building the capacity of the Ministry of Education to provide an evidence-based early grade reading program (in Dari and Pashto) for students in Grades 1 to 3 in both formal and community-based education schools. Creative also works in Ethiopia through the USAID **READ II** program to improve the reading proficiency of 15 million Ethiopian children. The positive impact of these programs depends on strong partnerships that Creative has forged with local and international partners, many of whom are UN Global compact members, including the International Rescue Committee, Viamo, and World Vision International.

Creative has also established a **Child Safeguarding Protection Policy**. Children living in countries where Creative operates often face a range of challenges, including extreme poverty, conflict, natural disasters, and disease. These challenges can increase the risk of child abuse, sexual or other types of exploitation, neglect, or even trafficking. The purpose of this policy is to ensure that Creative programs are safe for children by promoting awareness of their vulnerabilities and mitigating the risk of, or actual harm that



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may come to them. In addition, it is also to establish organizational guidelines, procedures and practices to ensure that children and youth directly involved in Creative's programs or activities are not subject to child abuse, exploitation, neglect, or human trafficking, or that their personal security and human rights are not otherwise compromised.

Safeguarding of Women and Other Vulnerable Adults Policy: In countries where Creative operates, women and other vulnerable adults, such as LGBT, the disabled, ethnic minorities, the rural poor, indigenous groups and others, often face a range of challenges, including extreme poverty, conflict, natural disasters, and disease. Moreover, women and other vulnerable adults are often subjugated, oppressed, discriminated, treated inequitably, or disrespected. These conditions, particularly those relating to mistreatment and inequality, can increase the risk of sexual abuse, exploitation, harassment, violence, or trafficking. The risks are heightened in humanitarian or fragile and conflict-affected contexts, where power imbalances can be particularly acute and the displaced have little recourse. The purpose of this policy is to establish organizational guidelines to ensure that women and other vulnerable adults directly involved in Creative's programs or activities are not subject to misconduct perpetrated by Creative employees, consultants or partners, and that Creative mitigates the risk of harm to them as beneficiaries of Creative's programs.

Finally, Creative's **Code of Conduct** broadly reflects well-established human rights and ethical principles. For example, Creative's Code of Conduct values diversity and inclusion; works to prevent harassment and discrimination of any form; promotes a safe and healthy workplace; and protects personal information. Creative is also expanding its training program around these and other ethical behavior policies.

Labor

Creative wishes to tap into its founding and ongoing collaborative spirit to continue to position itself as an employer of choice and business partner by actively demonstrating its commitment to executing diverse, inclusive and socially just business practices as it serves its clients and beneficiaries around the world. Creative is committed to corporate-wide diversity – inclusive of gender, age, race, ethnicity, orientation, ability, nationality, religion, veteran status, background, culture, experience, strengths and perspectives, and inclusive culture –where our employees feel welcomed, valued, respected, accepted and heard, and are enabled to fully participate in the business.

Over the course of 40 years, four women entrepreneurs grew Creative into a dynamic international development company with more than 1,300 diverse and experienced professionals around the world. Creative is committed to upholding the Compact's principles on labor and maintaining a safe and empowering workplace for all its employees in headquarters and the field. The principles of eliminating discrimination in respect of employment and occupation and the abolition of child labor are particularly relevant to Creative's programs and policies.

Creative has established a robust set of policies to prevent unfair or discriminatory employment practices. These include policies for equal employment opportunities, anti-discrimination, worker health and welfare provisions, ethical worker behavior, conflict of interest, anti-harassment, ensuring a non-hostile workplace, and others. Creative also uses tools and methods, such as localized gender assessments and audits, to better understand the needs of male and female staff in each context,



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ensure meaningful participation and representation of women in program staffing, and identify strategies to address barriers and norms that may negatively affect staff from minority groups.

In recent years Creative has established several policies to ensure child protection and safety in its global programs. Under its **Anti-Trafficking Policy**, Creative strictly prohibits a range of actions associated with human trafficking during program implementation, including severe forms of trafficking in persons; procuring commercial sex acts, and using forced labor in the performance of the contract. Creative also seeks to prevent trafficking through training programs, raising awareness, and promoting a culture of anti-trafficking among those hired or retained by Creative. In addition, if Creative personnel receive information that trafficking has been or may be occurring, it conducts a thorough investigation, determines the appropriate action to address any instances of inappropriate behavior, up to and including, termination of employment, and may withhold payments and/or terminate sub awards, grants, or procurements that are non-compliant with anti-trafficking regulations.

Creative's economic growth programs honor the right to economic empowerment, embedded in the International Covenant on Economic, Social and Cultural Rights. Creative supports the active participation of women and minority groups and the protection of children. The USAID-funded West Africa Trade and Investment Hub (WATIH) seeks to improve private sector productivity, profitability, and competitiveness in West Africa through market-based approaches.

Central America Regional Initiative (CARI): Persistent instability and insecurity in Central America have a significant and direct impact on U.S. national security interests. Far too many Central Americans, particularly in El Salvador, Guatemala, and Honduras, suffer from crime, corruption, gang activity, and lack of opportunities, which compel them to migrate. The February 2021 Executive Order on Creating a Comprehensive Regional Framework to Address the Causes of Migration, to Manage Migration Throughout North and Central America, and to Provide Safe and Orderly Processing of Asylum Seekers at the United States Border lays out a comprehensive approach to managing irregular migration flows consistent with U.S. values. As the United States' lead development Agency, USAID provides assistance to promote economic growth; improve security; support democracy, human rights, and good governance; and increase community resilience, to increase hope and opportunity so people can confidently build their lives at home.

A Creative workforce development project in Asia supports ethnic minority groups and highly prioritizes women in senior leadership of the project, such that seven of the eleven staff are women. From 2013 to 2017, Creative implemented the **Combating Exploitative Child Labor in Morocco- Promise Pathways** program with three international organizations and a network of local organizations to reduce child labor, assist youth of legal working age to secure decent work, and provide household members (aged 18 and older) with opportunities for improved livelihoods in rural and peri-urban areas of the Marrakesh-Tansift-Al Haouz region of Morocco.

Environment

The UN Global Compact challenges businesses to undertake initiatives to promote greater environmental responsibility and consciousness. Creative recognizes the importance of designing sustainable development programs for implementation, but also the importance of raising



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environmental awareness and practicing environmental consciousness in its day-to-day operations. As recommended by the Compact, Creative has drafted an Environment Management Policy that recognizes the importance of designing sustainable development programs for implementation, but also the importance of practicing environmental consciousness in its day-to-day operations.

Environment Management Policy: Creative strives to minimize any negative impact on the environment from its activities and operations and promote environmental awareness throughout our supply chains. This includes specific measures taken on projects that involve activities such as construction and certain agricultural interventions, as well as everyday measures that can be implemented in each office. These include actions such as minimizing paper and fossil fuel use, increasing energy efficiency and conservation, encouraging recycling, and making smart use of project vehicles to reduce our emissions and carbon footprint. Creative recognizes the importance of designing sustainable development programs for implementation, but also the importance of practicing environmental consciousness in its day-to-day operations.

Creative strives to contribute to sustainability efforts by employing green practices in our daily operations. Creative's headquarters is located in an environmentally friendly building with energy conservation mechanisms, such as automatic light and HVAC shut downs at the end of the work day and weekends. Toner cartridges are recycled, paper shredding is conducted through vetted safe-shredding certified vendors, and technological waste is disposed responsibly. Creative has also opted to use bean-to-cup coffee machines instead of coffee pods to significantly reduce plastic consumption. Creative complies with the United States 1995 Paperwork Reduction Act, and reduces environmental waste by recycling paper, glass, and aluminium. An information and communications infrastructure is in place to minimize travel by enabling staff to host meetings via Skype for Business, WhatsApp, Teams or Zoom.

Creative implements select USAID programs that require contractors to promote sound and sustainable environmental practices throughout the program's core activities. During start-up, Creative reviews program activities in the context of the Initial Environmental Examination (IEE) prepared for the activity. When a country-level IEE does not exist, Creative supports USAID in developing a supplemental IEE to the project's specific activities and context. Based on the threshold determinations and conditions of the IEE for each relevant project, Creative submits an Environmental Mitigation and Monitoring Plan (EMMP) as part of the initial work plan that guides implementation. Creative's management approach for such projects outlines the effective use of institutional arrangements such as sub-awards and sub-grants to achieve project results. Creative includes environmental compliance language in all sub-grants and sub-awards, and ensures subcontractors and grantees integrate appropriate environmental compliance requirements, such as integrating country IEE conditions into program work plans, ensuring allocation of appropriate resources, and regularly screening and reporting on appropriate elements of environmental compliance. Creative regularly trains grantees and/or subcontractors to increase their capacity to implement the relevant requirements of the country IEE. Creative also budgets appropriate resources to implement environmental compliance and mitigation activities, including project environmental management expertise and mitigation measures.

Recently, Creative has expanded its development work into programs that foster improved environmental stewardship and sustainability. For example, in Honduras, Creative implemented the ***Alianza para E Corredor Seco/Alliance for Dry Corridor*** program, which enhances the human capital, resilience, and livelihoods of 6,000 poor and extreme poor families in twelve municipalities in the dry



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corridor—one of the most impoverished and climate-fragile environments in the country. Through a workforce development program in Asia, Creative is improving sustainable livelihoods of historically discriminated ethnic groups, providing these communities with the skills and knowledge to thrive in a growing market economy.

Anti-Corruption

Creative as a company has a demonstrated track record of taking steps to ensure that it is vigilant against corruption, misconduct, and conflicts of interest. Creative recently implemented a new broad anti-corruption policy applicable to all Creative personnel worldwide. It is also Creative policy to comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”) and the local laws in every country in which we do business. FCPA mandates that companies establish and maintain accurate books and records and sufficient internal controls. FCPA applies to all employees of Creative, including officers and directors. In addition, Creative will require third parties who represent the company (such as agents, consultants, and contractors) to conduct themselves in a manner consistent with this policy.

Creative conducts formal and informal vetting for all employees and partners to ensure that no client funds go to blacklisted individuals, compliance with client-mandated rules and regulations, and an appropriate understanding of performance and reputation. Creative uses the Visual Compliance Database system to check more than 50 watch lists, including HM Treasury Consolidated List, United Nations Consolidated List, and Interpol Recently Wanted. Creative’s Security Department develops project-specific Vetting Plans adapted to each program requirements.

In addition, all staff are briefed on, and required to sign, Creative's **Code of Conduct** and conflict of interest policies. Creative has also developed specific training on the Code that employees take on an annual basis. If project staff are found to be engaged in corrupt activities, we remove those individuals from the project in a careful and culturally sensitive way. In all cases, we inform the client immediately if an allegation has been raised or suspicions arise, and work with the client to resolve the issue for the integrity of the program. Creative requires employees to disclose any suspected or actual cases of conflict of interest in which they may be involved or witness. If called for, Creative introduces third parties to ensure unbiased reviews.

Creative also recently established a **Whistleblower Policy** that informs Creative’s employees of their statutory whistleblower rights and protections. The policy provides that it is contrary to the values of Creative for any employee to retaliate against anyone who reports an allegation or violation in good faith, reports an ethics violation or a suspected violation of law, fraud/waste/abuse, or violation of any regulation governing the operations of Creative. An employee who retaliates against someone who has reported an allegation or violation in good faith is subject to discipline up to and including termination of employment.

Pursuant to Creative’s Reporting of Fraud, Allegations of Fraud and Misconduct Policy, Creative’s Security Office administers the receipt, review, and investigation and ensures proper disposition of all allegations of fraud and misconduct. Any allegation regarding a Creative employee or other relevant party involving violations of law, government regulations, or Creative standards of conduct must



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immediately be reported to the Team Lead via the program specific hotline or to Creative's Security Office Fraud and Abuse direct lines, via email, or online.

Creative is proud to have an Anti-Corruption Sr. Technical Advisor who ensures that Creative's policies and ethical principles are also a part of our on-the-ground development work. The Advisor supports staff across Creative's divisions to incorporate anti-corruption measures into our projects and with our partners, in line with Principle 10 of the UN Global Compact and the new U.S. Strategy for Countering Corruption, among others.

PART III: MEASUREMENT OF OUTCOMES

Creative is a results-oriented organization that uses evidence-based programming to promote the UN Global Compact's mission and principles. Below are examples of Creative-led programs that have achieved positive results in the areas of human rights, education, and labor.

- **The Nigeria Northern Education Initiative Plus:** Beginning in October 2015, under funding from the United States Agency for International Development (USAID), the Northern Education Initiative Plus project (NEI Plus/the Initiative) is a five-year, evidence-based Early Grade Reading (EGR) systems intervention. The project strengthens the capacity of Bauchi and Sokoto states to significantly improve reading outcomes for more than one million school-aged children and provide greater access to basic education to 268,000 Out-of-School Children (OOSC) attending 5,600 Non-Formal Learning Centers (NFLCs), Adolescent Girls Learning Centers (AGLCs), and Youth Learning Centers (YLCs), which served adolescent boys. The Initiative addressed a broad range of critical factors that affect learning, teaching, systems management, parental participation, and community engagement. It focused on strengthening the technical and administrative capacity, commitment, and accountability of federal, state, and LGEAs to provide effective English and mother-tongue-based (Hausa) EGR teaching and learning to pupils. The project also made a provision to develop EGR materials in widely spoken Nigerian languages: Igbo and Yoruba.
- **The Nigeria Education Crisis Response** program was implemented in Adamawa, Bauchi, Gombe and later expanded to Yobe and Borno states. It brought accelerated basic education and psychosocial support to more than 80,000 children whose futures would have otherwise been put on hold through more than 1,400 non-formal learning centers established throughout the life of the project.
- **West Africa Trade and Investment Hub (WATIH):** The United States Agency for International Development (USAID)-funded West Africa Trade and Investment Hub (Trade Hub or Activity) is a 5-year, \$140.2 million trade and investment facilitation activity that seeks to improve private sector productivity, profitability, and competitiveness in West Africa through market-based approaches. The Trade Hub is an integral part of the Prosper Africa initiative and partners with United States and West African private sector firms to generate new private sector investment in key sectors to create jobs and increase trade between the United States and West Africa, including through increased utilization of the African Growth and Opportunity Act (AGOA). This activity comprises two main components: (1) design and administration of a grant-making



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facility for private sector partnerships; and (2) technical assistance (TA) that directly supports, coordinates, and engages with qualifying recipients (i.e., partners and grantees) to achieve USAID's trade and food security objectives. In Nigeria, the Trade Hub also focuses on co-investment partnerships that increase agricultural productivity and the profitability of smallholder farmers in Nigeria under a Research and Development (R&D) Fund aimed at innovating and modernizing practices across five targeted value chains. The Trade Hub's grant making facility has also assisted small and medium enterprises to overcome disruptions in export-oriented supply chains, support domestic food security initiatives, and prevent job losses through grant assistance to maintain or scale-up their production and service capabilities. The Trade Hub considered potential co-investment partnerships with over 200 firms and executed grant agreements with 39 of these firms. An additional 90 firms are actively engaged in various stages. \$36.3 million in grants were awarded and the grantees will leverage \$260 million in co-investments to implement business activities that will deliver \$154 million in exports and create over 40,000 jobs.

- The ***Alianza para E Corredor Seco/Alliance for Dry Corridor (AJH)*** program has established and strengthened a combined total of 46 Outreach Centers that have benefitted more than 22,000 youth with English, ICT, and life skills instruction in Honduras. Through more than 100 partnerships with the private sector, AJH trained at-risk youth and former gang members in skills for income-generating activities.
- **Vamos Ler: Vamos Ler!** is a five-year program, funded by the U.S. Agency for International Development (USAID), whose goal is to strengthen the Mozambican government's ability to ensure that students in the target regions of Nampula and Zambézia can achieve grade-level fluency and comprehension in the local language in Grades 1-3. To this end, Vamos Ler! provides evidence-based technical and material assistance to improve early grade literacy instruction in Emakhuwa, Elomwe, and Echuwabo, along with new language acquisition and literacy support to prepare children for transition to Portuguese. Vamos Ler! supports the Ministry of Education and Human Development (MINEDH) to strengthen classroom and systems support and lay the foundation for sustaining and expanding bilingual early grade reading instruction.

Creative plans to participate in upcoming UN Global Compact networking and online events such as "United Nations Global Compact LIVE at Davos", and "Women's Empowerment Principles 101: Empowering Women in the Workplace, Marketplace, and Community." Creative also plans to continue participating in local and global Compact events of these nature to promote the Compact's principles and membership through its local and international partnerships and publicize its involvement with the Compact through multiple channels of communication.