

Last updated and approved by Nathan London Ltd. (UK) Board of Directors:  
September 2017

**MODERN SLAVERY AND HUMAN  
TRAFFICKING ACT  
*STATEMENT FOR FINANCIAL YEAR 2018***



## Introduction from Nathan London Managing Director, Mark Thomas

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Nathan Associates Incorporated and its subsidiaries (“**Nathan**”) have a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## Organisational structure and business

Founded in 1946, Nathan is an international development consulting firm with international offices in Washington DC, California, London, Delhi and Chennai. We are a premier provider of high quality analytic and economic solutions that delivers results to our clients around the world. We operate in over 50 countries, mainly in the developing world. This includes, but is not limited to, Africa, South and Southeast Asia, and South and Central America.

## Supplier adherence to our values

Our supply chain consists of vendors, suppliers, subcontractors, grantees, and consultants located in the US, UK and elsewhere. Nathan will only engage with partners, suppliers and business partners who conduct their businesses in a lawful and ethical manner, which includes the adoption of business practices that prevent or eliminate modern slavery and human trafficking. We ask all of our contractors, vendors, suppliers, and subcontractors to comply with Nathan’s ethical and compliance standards as described in Nathan’s Code of Business Conduct.

## Our policies

We are committed to no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to see that all parts of our business and supply chain are slavery free, we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues. Nathan London Ltd. operates under a number of internal policies to monitor that we are conducting business in an ethical, compliant, and transparent manner. These include:

1. **Anti-human trafficking policy.** This policy sets out the organisation’s stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

2. **Anti-corruption and anti-bribery policy.** This policy helps employees, contractors and suppliers to understand their obligations under the UK Bribery Act 2010.
3. **Recruitment policy.** We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees, contractors and suppliers to safeguard against human trafficking or individuals being forced to work against their will.
4. **Whistleblowing policy.** We want all employees, contractors and suppliers to know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals. We maintain an Ethics Hotline to help implement our policy.
5. **Code of business conduct.** This code explains the manner in which we behave as an organisation and how we expect our employees, contractors and suppliers to act.

All employees and contractors are required to sign an agreement that they will adhere to Nathan's Code of Business Conduct.

All of these policies are available and provided to our employees and contractors.

### Training

Nathan, in its commitment to maintaining high standards of workplace integrity, has instituted an Ethics Hotline to give employees a way to report conduct that may be unethical, illegal, in violation of professional standards, or otherwise inconsistent with our Code of Business Conduct.

Members of staff are trained on how to contact NAVEX Global, an independent third-party host, with complaints or concerns. NAVEX Global staffs the hotline 24 hours a day, 365 days a year.

Employees, contractors and suppliers can also report any unethical behaviour through their contract supervisor, line manager, or Chief of Party/Team Leader.

### Due diligence

Nathan exercises due diligence in all aspects of its work. Nathan considers the nature and business practices of every party it engages with to ensure that vulnerable workers are not being trafficked or enslaved in filling positions of low or unskilled labour along the supply chain. Nathan always promptly investigates and responds to any allegation or reports of potential violations of human rights.

## **Risk and risk mitigation**

Our internal policies allow us to identify and mitigate risk. In addition, Nathan has developed a comprehensive due diligence questionnaire that all subcontractors are required to complete.

Nathan has a culture of openness and accountability to ensure the delivery of these policies and that staff reports any potential violations.

## **Effectiveness in combating slavery**

Nathan's existing Key Performance Indicators (KPIs) reduce and mitigate the risk of modern slavery.

These KPIs include:

- Reporting of any credible information about suspected trafficking to Contracting Officers, the Office of the Inspector General and law enforcement agencies;
- Ensuring that all employees agree to comply with Nathan's Anti-Human policies as set out above; and
- Ensuring that the Anti-Human Trafficking Policy and other policy documents are kept up-to-date.

During the year, Nathan will continue to develop appropriate KPIs to measure progress in this domain.

## **Approval of this statement**

This statement is made pursuant of section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 2018.



Mark Thomas  
Managing Director  
Nathan London Ltd.