



Supplier Code of Conduct

Standards of
Doing Business with
Abt Associates



OCTOBER 2021



Introduction

For more than 50 years, Abt Associates (Abt) has been guided by our mission, *to improve the quality of life and economic well-being of people worldwide*. As a global professional services firm, our suppliers' performance and alignment to high ethical standards is critical to our ability to deliver on our mission. The Supplier Code of Conduct (Code) establishes the standards of business conduct required of all suppliers in the delivery of goods or services to Abt and/or our clients, worldwide. As a signatory of the United Nations Global Compact, the Code reflects our commitment to the Ten Principles, including our commitment to human rights, the environment, health and safety, business ethics, and the development of a diverse and sustainable supply chain.

References in the Code to "suppliers" are intended to cover suppliers, contractors, grantees, subcontractors, subgrantees, subawardees, subrecipients, and any other third-party doing business with Abt. We require our suppliers to abide by all applicable laws and regulations, as required by our clients and within the geographies in which they conduct and/or maintain a place of business.

We expect our suppliers to read and understand our Supplier Code of Conduct and flow down the principles of the Code to all related entities that provide goods or services to Abt. By accepting any buy-side contract from Abt, suppliers acknowledge their acceptance of the principles of decent business conduct as described by the Code and their intention to comply with its requirements.

The Code herein represents Abt's commitment and expectations to the following topics. Abt expects suppliers to review the associated management documents for information on how to demonstrate and/or submit proof of compliance with the commitments outlined hereafter.

Labor and Human Rights

The first value of Abt is that we are *mission driven*. Counter to our values and mission is the abuse of human rights.

Anti-Trafficking, Forced & Child Labor

We believe every person deserves to be treated with dignity, respect, and compassion. Abt will not tolerate trafficking in persons, use of child labor, use of forced labor, modern slavery, sexual exploitation, abuse, or procurement of commercial sex acts by our suppliers. Trafficking includes, “the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt, bondage, or slavery, and sex trafficking,” as defined by the United States (US) Trafficking Victims Protection Act of 2000.

Suppliers must comply with all applicable laws against trafficking, child and forced labor, modern slavery, and preventing sexual exploitation, abuse, and harassment, including but not limited to the US Federal Acquisition Regulation 52.222-50 Combating Trafficking in Persons; the Australia Department of Foreign Affairs and Trade’s (DFAT) Environmental and Social Safeguard Policy, standards on the Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH), and Child Protection Policies; and relevant anti-trafficking and human rights policy obligations in the United Kingdom (UK) such as the European Convention on Human Rights and the Modern Slavery Act 2015. Suppliers may be required to follow additional policies and procedures in connection with goods and services pertaining to Abt contracts with or for government agencies.

Abt maintains a zero-tolerance policy for any violation of these standards of conduct.

Employment & Working Conditions

Suppliers must comply with all applicable local wage and labor laws, including minimum working age laws. All use of temporary, dispatch and outsourced labor must be in accordance with local law. Abt expects suppliers to provide employees with understandable wage statements that include sufficient information to verify accurate compensation for work. Suppliers must provide wages and benefits that meet or exceed local law requirements and are paid and provided for in a timely manner.

All suppliers must provide a safe and healthy working environment that complies with local laws and minimizes occupational hazards. Suppliers must adopt practices to minimize health and safety risks, safeguard the welfare of its employees and other impacted individuals or entities, support accident prevention, and ensure a safe workspace free from harassment. Suppliers must provide a work environment that is free of illicit drugs, alcohol, or other dangerous substances that impair performance or decision-making capabilities.

Non-Discrimination & Harassment

Suppliers must provide equal employment opportunity to qualified individuals regardless of their race, color, religion, gender identity, sexual orientation, national origin, age, physical or mental handicap, disability, marital status, pregnancy, political affiliation, union membership, veteran status, or other characteristics protected by law. Suppliers must not engage in discrimination in hiring, compensation, access to training, promotion, termination, and/or retirement based on these characteristics and must accommodate all disabilities to the extent required by law.

Suppliers will commit to a workforce and workplace free of all forms of harassment and unlawful discrimination. Suppliers will ensure that employees are afforded an environment free from physical, psychological, sexual, and verbal harassment, threat of violence, retaliation, or other abusive conduct. Suppliers will not engage in, condone, or tolerate any form of harassment or discrimination against or among their employees. Suppliers shall provide employees with reasonable reporting procedures they can use to bring workplace concerns to the attention of management for appropriate resolution. Suppliers must not tolerate retaliation against employees who make these reports.

Equity & Localization

Abt celebrates different perspectives, cultures, expertise, and points of view and believes that diverse teams deliver better solutions for our clients. We are committed to the development and growth of a diverse supplier network to excel in our mission and services. Therefore, we seek suppliers who value and promote equity, diversity, and inclusion (EDI) in their business, products, and services.

Abt has committed to embedding an equity and localization approach in all that we do, including our engagement with our supply chain. Abt has committed to increasing the numbers and diversity of suppliers by increasing procurement opportunities with companies and suppliers who are Black, Indigenous, and People of Color (BIPOC)-owned, women-owned, and owned by people with disability. Abt also seeks to maximize local content and ownership over aid delivery where possible. In alignment with Abt's strategy, suppliers should monitor and set long term targets for increasing diversity and local ownership in their supply groups.

Ethics and Compliance

We expect our suppliers to conduct business in an ethical manner and act with integrity. All suppliers must conduct their business activities in full compliance with all applicable laws and regulations while conducting business with and/or on behalf of Abt. Unethical behavior will not be tolerated.

Business Integrity

The highest standard of integrity is expected in all our business dealings. Abt expects this to flow to our suppliers through our supply chain at all levels and within all countries of operation. Suppliers must abide by all applicable anti-corruption and anti-bribery laws. All forms of fraudulent behavior, corruption, extortion, bribery, and embezzlement are strictly prohibited.

Suppliers must not make or accept illegal payments directly or indirectly, including money, improper gifts, or other unlawful incentives (e.g., 'facilitation payments') to or from business partners or government officials. Suppliers must accurately reflect their business dealings in their books and records and upon request, make these available to Abt. Suppliers shall employ monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

Conflict of Interest & Anti-Competitive Behavior

Suppliers must avoid even the appearance of bias, conflicts of interest, or the undue influence of others in their work with Abt. Suppliers will immediately notify Abt of any known family or other close personal relationships with our employees who may have a financial influence over the Supplier's engagements with us. Suppliers will conduct their business in line with fair competition and in accordance with all applicable competition laws.

Trade

Suppliers must comply with all applicable trade controls, as well as all applicable export, re-export, or transfer of goods and services (including software and technology) and import laws and regulations. All invoices and any customs or similar documentation submitted to Abt or governmental authorities in connection with transactions involving Abt must accurately describe the goods and services provided and the price thereof.

Data Privacy & Security

Abt is committed to protecting employee, company, and client information. Suppliers must comply with all applicable data privacy, security, and breach notification laws. Suppliers with access to Abt's or our customers' confidential information, proprietary information, or intellectual property must not use or disclose such information to any other person without Abt's advance written consent. Suppliers must use this information only as it is authorized and intended.

Environment

Abt is committed to minimizing the creation of pollution and managing unavoidable waste responsibly. We further strive for continual improvement in environmental performance through active involvement of all our employees and partners to exceed all relevant legislative and contractual requirements. As such, suppliers shall take steps to minimize their use of natural resources and any negative impact their operations have on the environment.

Environmental Permits & Compliance

Suppliers must operate in compliance with all applicable environmental laws and regulations, including but not limited to United States Agency for International Development (USAID) Environmental Procedures, the UK International Development Act, the Foreign, Commonwealth & Development Office's (FCDO) Environmental Policy Statement on Operations, and DFAT's Environment Protection Policy for the Aid Program and Environmental and Social Safeguard Policy. All required environmental permits, approvals and registrations are to be obtained, kept current, and complied with in accordance with the operational and reporting conditions and requirements defined therein. Upon request, copies must be made available to Abt.

Hazardous Substances & Waste

Suppliers shall ensure that all environmentally sensitive and hazardous materials are identified and managed to safeguard their handling, movement, storage, recycling, reuse, or disposal. The release of hazardous substances must be minimized. Abt expects suppliers to identify, monitor, control, treat, and reduce hazardous air emissions, wastewater, and physical waste generated in and from their operations.

Resource Efficiency & Environmental Footprint

Suppliers should demonstrate a clear understanding of the environmental and climate risks, impacts, and responsibilities associated with the goods and services they provide. Suppliers must have in place an environmental policy, statement, or program to actively measure, manage, and mitigate these risks. The implementation of such should be evident and address context-specific environmental performance, including but not limited to greenhouse gas (GHG) emissions, water, and waste. Reduction targets and action plans for reducing these environmental impacts shall also be evident.

Monitoring and Compliance

Continuous Improvement

The standards of conduct described in this Code are critical to the ongoing success of Abt. Suppliers shall pursue continuous improvement in their internal operations, within their value chain, and across all related entities. Abt expects suppliers to be accountable and responsible for performance and to always be honest about capacity and capability of their operations.

As a supplier to Abt, the supplier's role begins, but does not end, with understanding this Code. If any compliance issues arise, the supplier has the responsibility to immediately make them known to Abt.

Violations

Violations of the Code will not be tolerated. Suppliers are required to immediately report to Abt any violations of the Code made by the supplier or any of its representatives to the supplier's primary Abt contact in accordance with contract obligations. If for whatever reason this is not possible or appropriate, please use one of the following channels:

Ethics and Compliance Helpline:

888-928-4231

Web-based reporting option:

<https://secure.ethicspoint.com/domain/media/en/gui/48834/index.html>

WhatsApp:

001-301-957-0656

Suppliers to Abt Australia and Abt Britain should email concerns to:

incident.report@abtassoc.com.au

Abt will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice, reported questionable behavior, or a possible violation of the Code.

Any supplier that is in violation of the Code could see the cancellation of its current business relationship with Abt and all future business arrangements. In the case of a violation of law or regulation, Abt may be required to report such violations to the proper authorities.

Audit & Review

Abt reserves the right to conduct compliance surveys and employ other mechanisms to evaluate supplier compliance with the Code. Abt expects suppliers to actively audit and monitor their day-to-day management process with respect to the Code and, upon request, to provide evidence of compliance to Abt. This Code will periodically be reviewed by Abt. Within a reasonable time period, suppliers will be informed of any updates to the Code made by Abt.