

This statement sets out actions taken by the Abt Australia and Abt Britain Corporate Group (**the Group**) to assess and address modern slavery risks in its global operations and supply chain for financial year starting 1 April 2020 and ending 31 March 2021, pursuant to s54(1) of the *Modern Slavery Act 2015 (UK)* and the *Australian Modern Slavery Act 2018 (Cth)*.

The Group is wholly owned by Abt Associates Inc. (F.I.D. 04-2347643), a company incorporated under the laws of the Commonwealth of Massachusetts and registered in the State of Maryland in the United States of America (collectively referred to as **Abt Associates**).

REPORTING ENTITIES

This joint statement is prepared and submitted by Abt Associates Australia Pty Ltd (A.C.N. 161 695 156) on behalf of the following reporting entities which are wholly owned subsidiaries: (1) Abt Holdings Australia Pty Ltd (A.C.N. 129 332 681); (2) Abt Group Australia Pty Ltd (A.C.N. 120 662 026); and (3) Abt Associates Pty Ltd (A.C.N. 091 591 294) for the *Australian Modern Slavery Act 2018 (Cth)*; and (4) Abt Britain Limited (Company Number 10633588) (referred to as **Abt Britain**) for the *Modern Slavery Act 2015 (UK)*. Abt Associates Australia Pty Ltd has prepared this statement in consultation with the reporting entities listed above.

Abt Associates Australia Pty Ltd and its Australian reporting entities are collectively referred to as **Abt Australia**. A joint statement has been prepared because these entities use the same policies and processes, operate in the same sector and have shared suppliers. This also applies to the other Australia-based and overseas entities that Abt Australia owns or controls.

Abt Britain has adopted Abt Australia's compliance framework and has comparable policies and procedures as Abt Australia, operates in the same sector, and has comparable procurement needs.

The Abt Australia and Abt Britain boards comprise substantially the same directors and company secretary. Abt Australia and Abt Britain senior management have also reviewed and participated in the preparation of this statement. Both Abt Australia and Abt Britain own and control other entities to facilitate the delivery of services in home office locations and overseas.

ABOUT ABT ASSOCIATES

Abt Associates is defined by its mission to improve the quality of life and economic wellbeing of people worldwide. We are a mission-driven, global leader in research and program implementation in the fields of health, social and environmental policy, and international development. Known for our rigorous approach to solving complex challenges, Abt Associates is regularly ranked as one of the top 20 global research firms and has been recognised as one of the top 40 international development innovators.

Our global staff of over 3,700 work in more than 50 countries and includes national and international experts who are recognised for their knowledge, innovative research techniques, and insightful analyses and recommendations.

The Group's operations include direct employment of workers, predominantly in professional services roles, with provision of program management services and specialist advisory services including but not limited to: governance and public sector reform, health services, policy and systems, research monitoring and evaluation, and gender equality and social inclusion. As part of our program management services, we may manage the following on

behalf of our clients: procurements (including of technical assistance), grants, delivery of remote services, subcontracting of projects, subcontracting of local services, impact investing and behavioural change initiatives.

Abt Australia’s head office locations are based in Brisbane and Canberra, Australia with overseas operations in the Asia Pacific region. Abt Britain’s head office is based in London, United Kingdom with overseas operations in Asia, Africa and Eastern Europe. The Group’s supply chain is complex and dispersed across these regions. In addition to standard procurement required to support a professional services firm, the supply chain also consists of downstream partners (subcontractors and grantees) engaged to support delivery of international development programs overseas. The diverse supply chain includes NGOs, research institutions and universities, consultancy companies, church partners, local in-country suppliers, travel and accommodation providers, security firms, suppliers of medical and IT equipment and consumables.

Supply chain: Key¹ products and services sourced in Australia and overseas during the reporting period

Construction work	IT, Office equipment and consumables	Professional services, including legal, tax and other accounting services
Flights and travel expenses	Motor vehicles, rental vehicles and other vehicle running costs	Recruitment and training (including medical and background checks)
Housing and accommodation	Office rent, including cleaning and maintenance	Security
Insurance	Telephone and internet	Software

POLICIES

Abt Associates is a signatory to the United Nations Global Compact (**UNGC**), and supports the Ten Principles of the UNGC on human rights, labour, environment and anti-corruption, including the elimination of all forms of forced and compulsory labour (**principle 4**), and the effective abolition of child labour (**principle 5**).

Abt Associates has established a multi-pronged approach to safeguarding measures that are embedded in organisational practice and clearly communicated to staff, contractors, partners and communities associated with our programs in all contexts.

¹ Products and services supplied by our top suppliers (determined by type and spend)

During this reporting period, Abt Australia and Abt Britain strengthened its workplace culture and key safeguarding measures to address common vulnerabilities and power imbalances, which are highly relevant to combatting modern slavery. These include:

- Introducing the *Respect at Work Policy* which was formally adopted in January 2021. This policy makes a firm commitment to cultivate a workplace culture that proactively fosters an inclusive, enabling and respectful environment, in which harm and abuse is less likely to happen. It aims to raise awareness of the different types of unacceptable behaviour in the workplace, prohibits all forms of unacceptable behaviour as defined by national and international laws, increase understanding of employee rights, roles and responsibilities and ensure people are held accountable for their actions.
- Strengthened incident management procedures across the Group to set the framework for incident reporting through formal and informal mechanisms; and to ensure incidents are taken seriously, dealt with promptly and with due care and sensitivity with a commitment to a survivor centred approach. Abt Associates has a robust *Safeguarding Code of Conduct* which applies to all personnel worldwide, *Whistleblower Protection Policies* and an independent Ethics and Compliance Helpline (with an anonymous reporting option) to ensure that personnel can report concerns without fear of retaliation. These documents, as well as other relevant policies, procedures and reporting tools, are available to staff through the Abt Global Intranet (**AGI**) and the Quality Management System (**QMS**).
- Established Communities of Practice for Safeguarding Officers to support capacity building and knowledge sharing across global programs, enabling discussion about local challenges and solutions whilst ensuring governance and policy adherence. The Safeguarding Communities of Practice remit will be broadened in the future to include modern slavery requirements and best practice in responding to and preventing modern slavery incidents in the Group’s operations.

Refer to the table below for an overview of Abt Associates’ comprehensive suite of policies and procedures to meet safeguarding commitments. The table includes policies that have been updated and restructured to ensure intersectionality during this reporting period, as well as support networks that have been established formally and informally. These policies include good practice in organisational leadership, risk assessments, governance and workplace culture, with reporting and disciplinary elements and adherence to legislative and client contract requirements.

Abt Associates intends to integrate a targeted response to combatting modern slavery, by leveraging its comprehensive *Safeguarding Framework*. Abt Associates will leverage and align safeguarding policies to apply across its Group operations, including the extension of Abt Britain’s *Modern Slavery Policy* to apply to Abt Australia, and with reference to international best practice in modern slavery.

Framework	Key Policies	Support Networks
<p>Safeguarding Abt Associates is committed to take all possible steps to promote the rights of all, to strengthen</p>	<p>- Modern Slavery and Human Rights Abuses Policy (Abt Britain)</p>	<p>Safeguarding Community of Practice</p>

<p>protections and to prevent harm and abuse.</p> <p>The safeguarding framework aims to prevent likelihood of exploitation or abuse for any person who may be in a vulnerable situation and where unequal power dynamics exist.</p>	<ul style="list-style-type: none"> - Safeguarding and Child Protection Policy (Abt Britain) - Prevention of Sexual Exploitation, Abuse and Harassment Policy (Abt Australia) - Child Protection Policy (Abt Australia) - Respect at Work Policy - Whistleblower Protection Policy - Safeguarding Code of Conduct 	<p>Respect at Work Peer Support Network</p>
<p>Equity</p> <p>Abt Associates has a company-wide commitment to equity. This includes pro-actively seeking a workplace culture where people are treated fairly with dignity and respect, celebrating difference and embracing unique perspectives and contributions.</p>	<ul style="list-style-type: none"> - Gender Equity Policy (Abt Australia) - Equality, Diversity and Inclusion Policy (Abt Britain) - Volunteering Policy (Abt Australia) - Flexible Work Policy - Respect at Work Policy 	<p>Diversity and Inclusion Working Groups</p> <p>Respect at Work Peer Support Network</p>
<p>Incident Management</p> <p>Holistic approach to Incident Management with a commitment to a survivor centred approach (where relevant), investigating and managing all types of incidents in an ethical, transparent and accountable way.</p>	<p>Targeted incident management procedures</p> <ul style="list-style-type: none"> - Safeguarding (all types) - Whistleblowing - Workplace Health Safety & Security 	<p>Work Health and Safety Focus Group</p> <p>Safeguarding Community of Practice</p>

RISK ASSESSMENT AND CONSULTATION

During the reporting period, the Group conducted an initial group wide risk assessment in July/August 2020. Resources were dedicated to understanding key risk factors related to modern slavery, including the ILO indicators of forced labour, and private sector best practice in managing and mitigating the risk of modern slavery practices in operations and supply chains. Briefing/training sessions were held to ensure personnel informing the group wide risk assessment were briefed on the key risk factors and lessons learned from this process. In preparation of this Statement, the group wide risk assessment was reviewed in June/July 2021.

Consultation with overseas entities owned and controlled by Abt Australia and Abt Britain was conducted at the program level given these entities are set up to facilitate the delivery of programs overseas. Australia-based entities owned and controlled by Abt Australia were represented by the higher entity. All programs and home office locations completed a local risk assessment pertaining to their local operations and supply chain and informed by their country/regional context.

This group wide risk assessment considered a comprehensive review of findings in the initial risk assessment, together with further analysis to consolidate and produce the Group’s overall risk assessment.

FINDINGS

The Group’s risk rating of modern slavery practices in its operations and supply chain are outlined below.

Key risk sources identified include:

- Lack of transparency in the supply chain, which is complex and includes high risk locations and high-risk industries, such as medical equipment, cleaning services and the hotel industry.
- Prevalence of modern slavery in the Asia Pacific region – the region accounts for 62% of the global estimate (even though it only accounts for 56% of the world’s population). It also has a high prevalence of forced labour compared to other regions. Abt Australia has programs in Papua New Guinea, the Philippines, Timor-Leste and Indonesia where the estimated prevalence of modern slavery victims per 1,000 population are 10.3, 7.7, 7.7, and 4.7, respectively. Australia and the United Kingdom rates are 0.6 and 2.1 for every thousand people in the country, respectively.²

The below table outlines the **inherent risk profile** for this reporting period.

	Risk events	Likelihood	Consequence	Inherent risk rating		Likelihood	Consequence	Inherent risk rating
Abt causes or contributes to:	Slavery	Rare	Severe	Medium	Abt's supply chain causes or contributes to:	Possible	Severe	Very High
	Servitude	Rare	Major	Medium		Possible	Major	High
	Forced labour	Unlikely	Major	Medium		Possible	Major	High
	Deceptive recruiting	Unlikely	Major	Medium		Possible	Major	High
	Debt bondage	Unlikely	Major	Medium		Possible	Major	High
	Human trafficking	Rare	Major	Medium		Possible	Major	High
	Forced marriage	N/A	N/A	N/A		N/A	N/A	N/A

² The Walk Free Foundation, 2018 Global Slavery Index: Asia and the Pacific Report (accessed 18 September 2020) <https://www.globalslaveryindex.org/2018/findings/regional-analysis/asia-and-the-pacific/>

	Worst form of child labour	Unlikely	Severe	High		Possible	Severe	Very High
Abt is directly linked to modern slavery		Unlikely	Major	Medium				

PROCUREMENT AND GRANTS DUE DILIGENCE

As identified above, the risks of modern slavery practices continue to be highest in the supply chain. We have in place baseline and comprehensive due diligence assessments when engaging downstream partners as part of our procurement and grants management, as listed under the *Safeguarding Framework*. Although the inherent risk of modern slavery through the supply chain exists, Abt Britain has fewer high-risk suppliers because of the nature and size of current operations. In this reporting period, Abt Britain have not identified any purchasing practices that could put pressure on suppliers, leading to modern slavery. Abt Associates intends to further develop its formal control framework in response to the Group’s modern slavery risk assessment and will review and refine the due diligence framework accordingly. Currently, our baseline measures include:

- Abt Britain’s procurement policies and processes follow the FCDO *Supply Partner Code of Conduct* and other client contract requirements, including safeguarding checks when undertaking UK Government-funded procurement.
- Abt Australia’s procurement policies and processes follow the principles of the *Commonwealth Procurement Rules, Commonwealth Grant Rules* and other client contract requirements, including child protection risk-based assessments and control strategies when undertaking Australian Government-funded procurement.
- The due diligence framework requires that all downstream partners must be checked against global sanctions lists, in recognition of the growing nexus between modern slavery and terrorism. These checks aim to prevent funds being diverted to terrorist organisations or individuals, who may engage in modern slavery practices to fund or further their objectives.
 - Sanction checks relevant to Abt Britain: Proscribed Terrorist Organisations List; Consolidated List of Financial Sanctions Targets in the UK; OFSI Consolidated Financial Sanctions List Search; Company Check (UK-registered consultants).
 - Sanction checks relevant to Abt Australia: Australian National Security Terrorist Organisation List, DFAT Consolidated List; World Bank Listing of Ineligible Firms and Individuals; Asian Development Bank (**ADB**) Anticorruption Sanctions List.

RESPONSE TO COVID-19

Abt Associates recognises the impact of the global COVID-19 pandemic may increase the vulnerability of workers in our global operations and supply chain to modern slavery. These increased risks may relate to sudden changes to remote working environments, dispersed

work teams, changes to organisational structure or workforce reductions. These can disproportionately affect some workers and increase their exposure to modern slavery and other forms of exploitation. These factors may include loss of income or fear of loss of income, low awareness of workplace rights, requirements to work excessive overtime to cover capacity gaps, or the inability to safely return to home countries.

Sudden changes to supply chain structure can also impact modern slavery risk, such as the increased demand for PPE and supply chain shortages and delays due to travel/freight restrictions. In response to COVID-19, Abt Australia's procurement of medical consumables and PPE increased during the reporting period compared to pre-COVID-19 levels.

Abt Associates established a Crisis Management Team on 3 February 2020 which continues to be in place today, to protect the health and safety of our workers, not only in Australia and Britain, but also in our overseas program locations. A variety of measures have been put in place, including:

- Prioritising our capacity to retain and pay workers despite potential interruptions, uncertainties and threats to business arising from the pandemic.
- Recognising the impact of the pandemic and the challenge of travel and movement across borders, we have established a risk management approach, including the *Adaptive Reopening Framework* and the *Adaptive Remobilisation Framework*, to inform when and how to open offices safely and to guide decision making for domestic and international travel.
- Continuing to closely monitor the COVID-19 environment and ensure COVID safe work practices are established for each country and office location, guided by a COVID-19 risk assessment and COVIDsafe plan relevant to the country and local context.

In addition, where required our overseas health programs have pivoted to support the local response to COVID-19, including facilitating the procurement of protective equipment.

MEASURING EFFECTIVENESS

Abt Australia and Abt Britain measures the effectiveness of actions taken to combat modern slavery through several mechanisms as follows:

- percentage of programs and home office locations that provided input into the group-wide risk assessment – being 100% for this reporting period. This ensures that the consolidated assessment is informed by on-the-ground, local insight, and the resulting control strategy will be fit-for-purpose.
- percentage of Abt Britain personnel who received the ethical training package during their induction - being 100% during this reporting period.
- percentage of Abt Britain personnel who completed training on modern slavery and human rights abuses - being 100% during this reporting period.

As Abt Australia and Abt Britain introduce other control measures in response to the Group's Modern Slavery Risk Assessment to identify, aim to prevent, mitigate and account for how the group addresses modern slavery, we expect that other key performance indicators will be introduced to measure the effectiveness of our actions.

In addition, our internal audit department provides independent assurance that our risk management, governance and existing internal control environment are operating effectively, and will similarly provide a measure of effectiveness as future modern slavery policies and processes are introduced.

REMEDICATION AND NEXT STEPS

Abt Associates understands that remediation refers to the prevention of situations of modern slavery, such as forced labour and labour trafficking, and as far as possible correcting the harm experienced by victims.

Abt intends to extend our comprehensive safeguarding control framework to include refinement of incident management procedures and introduction of a remediation action plan for modern slavery, with consideration to:

- be flexible and responsive to the needs and wishes of the victim.
- respond to a local understanding of the factors driving modern slavery.
- understand the risks and sensitivities present in the local context.
- be delivered in accordance with national law and international labour and human rights standards.
- incorporate means of preventing further abuses.

The above principles and good practice already inform Abt Australia's *Commitment to Safeguarding Statement* in relation to *Child Protection and Preventing Sexual Exploitation, Abuse and Harassment (PSEAH) Policy*. These commitments will be extended further, together with a detailed gap analysis of relevant policies and procedures, to address and combat the unique challenges of modern slavery.

Following a group-wide risk assessment to ensure we take an informed approach towards combatting modern slavery, we intend to:

- continue to strengthen and develop Abt Associates comprehensive *Safeguarding Framework*, with Modern Slavery to convene under this framework.
- review and leverage the strengths of existing safeguarding policies and procedures to be consistently applied across the Group (to the extent possible) including a commitment to:
 - undertake a gap analysis of incident management procedures to identify areas requiring adaptation and develop a remediation action plan to address the nuances of modern slavery requirements.

- undertake a gap analysis of Abt Britain’s current *Modern Slavery and HRA Policy* to identify areas for improvement and extend policy application to Abt Australia.
- introduce targeted training for modern slavery for Abt Australia personnel and support the capacity building of key internal stakeholders with responsibilities for the prevention and management of modern slavery requirements across the Group.

Abt Australia and Abt Britain are committed to identifying, preventing and mitigating modern slavery in our operations and supply chain. We have a zero-tolerance approach towards modern slavery in our operations, and to the extent that we can influence the different tiers of our supply chain, in our supply chain as well. We will continue to monitor the effectiveness of our policies and actions, investigate reports of policy non-compliance, investigate all complaints about suspected and confirmed modern slavery activities in our operations and supply chain, and take prompt corrective action wherever required. To date, we have not received any such complaints.

STATEMENT APPROVAL

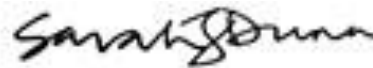
This statement was approved by the board of Abt Associates Australia Pty Ltd on 16 September 2021 on behalf of each of the reporting entities it owns and controls.

This statement was approved by the board of Abt Britain Limited on 16 September 2021 on behalf of each of the reporting entities it owns and controls.

Signed on behalf of Abt Australia and Abt Britain:



Jacqui De Lacy
Managing Director
Abt Australia



Sarah Dunn
Managing Director
Abt Britain