


UK Modern Slavery Act
Slavery and Human Trafficking Statement – FY 2016

Date of Statement	October 1, 2016
Signature:	
Name/Title:	Mary Elizabeth Reiss Vice President, Compliance and Ethics Officer RTI International

RTI is an independent, nonprofit institute that provides research, development, and technical services to government and commercial clients worldwide. Our mission is to improve the human condition by turning knowledge into practice.

Established in 1958 as the Research Triangle Institute, RTI has a distinguished history of scientific achievement in the areas of health and pharmaceuticals, education and training, surveys and statistics, advanced technology, international development, economic and social policy, energy and the environment, and laboratory testing and chemical analysis.



turning knowledge into practice

1. Organizational Structure and Supply Chains

RTI International is one of the world's leading research institutes, dedicated to improving the human condition by turning knowledge into practice. Our staff of more than 3,700 provides research and technical services to governments and businesses in more than 75 countries in the areas of health and pharmaceuticals, education and training, surveys and statistics, advanced technology, international development, economic and social policy, energy and the environment, and laboratory testing and chemical analysis. In 1958, leaders in business, academia, and government in North Carolina founded RTI as the centerpiece of the Research Triangle Park.

Headquartered in Research Triangle Park, North Carolina, RTI maintains offices in the United States and around the world to support ongoing projects and changing client needs. We have conducted projects in more than 140 countries and have more than 50 years of international experience.

In addition, to RTI's headquarters in North Carolina, USA, RTI maintains offices in the United States and throughout the world. Our international regional offices in Asia, Africa, and Latin America and the Caribbean serve as operational hubs for projects throughout these regions. We also maintain a wholly owned subsidiary in India, representative offices in China and the Middle East, RTI Health Solutions offices in Europe, as well as dozens of project-specific offices in many of the countries where we work.

RTI is led by an accomplished group of senior executives who represent a cross-section of our research fields and business operations. These leaders implement our business strategy and oversee operations for our global enterprise. Our governing structure comprises the members of the corporation, the board of governors, and the corporate officers. The members of the corporation, representing Duke University and The University of North Carolina, meet annually as the nonprofit equivalent of stockholders. They elect the governors, who represent the business and scientific communities. Our primary governing body is the board of governors, which formulates policy consistent with our mission to improve the human condition by turning knowledge into practice. The board meets at least bimonthly and consists of up to 15 governors who represent the 17 University of North Carolina institutions, Duke University, and the business and scientific communities. Corporate officers are senior management team members who are accountable to the board for specific aspects of corporate governance and financial management. More information on RTI's leadership may be found [here](#).

As an independent, non-profit research organization, RTI partners with universities, non-profits, and various international and commercial companies to provide research related services and/or technical assistance to our government and non-government clients. The relationship between RTI and our partners, subcontractors and consultants is managed through RTI's Global Supply Chain organization which consists of more than 30 supply chain professionals. Nearly two-thirds of GSC staff have an advanced certification and/or a postgraduate degree in fields such as supply chain management, business and accounting, and law; among them, the members of the senior management team have more than 100 collective years of supply chain experience.

2. Organizational Policies and Procedures

RTI has a culture of compliance and zero tolerance for corruption or unethical behavior. This begins with RTI Policy 1.23 which specifically prohibits any form of slavery or human trafficking, including trafficking-related activities, in any country in which RTI does business. A copy of this policy is available upon request. In addition, we maintain robust compliance and ethics programs that are aligned with our corporate values. Key elements of RTI's programs include written compliance standards and procedures, ongoing employee training, regular audit evaluation and monitoring of compliance program

effectiveness, a reporting process for complaints and concerns, corrective disciplinary actions for noncompliance, and investigation and remediation of problems.

RTI's leadership understands the importance of anti-trafficking and anti-corruption initiatives and has devoted the resources sufficient to ensure compliance. Existing staff includes a dedicated Ethics Officer and Vice President of Compliance who is fully supported by the Board of Governors and the Chief Executive Officer and who leads RTI's Ethics and Compliance program. The Vice President of Internal Audit and the Chief Risk Officer have independent authority to execute their duties. Moreover, an Executive Compliance Committee, led by RTI's Ethics Officer and Vice President of Compliance, and comprised of members of RTI's Executive Leadership Team, meet monthly to assess Institute level and project specific compliance risks. These individuals, and many others, constantly work to ensure that corruption is avoided or quickly and efficiently identified and remedied.

RTI issues a [Code of Conduct](#) that all employees must review and acknowledge every year and with which they are expected to comply. The Code clearly prohibits human trafficking and serves as a guide to help RTI and our employees conduct projects ethically and in adherence with all applicable laws. It has been translated into multiple languages.

The obligation to adhere to the Code of Conduct extends to all project partners and stakeholders. All project implementing entities, including sub-contractors, grantees, government partners and vendors, have access to the Code on RTI's website. In addition to our Code of Conduct and ongoing ethics training, RTI issues a project specific Employee Handbook for each country where we operate. The Handbook will further emphasize and explicitly prohibit corrupt practices of any kind related to human trafficking, forced and child labor. Disciplinary actions for noncompliance with RTI corporate and project specific policies and procedures and the Code of Conduct will be clearly explained in the Handbook. RTI also has developed a [Global Supply Chain Supplier Handbook](#) available on RTI's website that further outlines expectations for all suppliers doing business with RTI.

RTI maintains an anonymous Ethics Helpline (919.541.7070, 877.212.7220 toll-free), which is a dedicated confidential phone line directly to RTI's Ethics Officer. The RTI ethics office also has a dedicated ethics e-mail address (ethics@rti.org). The Helpline and ethics e-mail address provide a means through which RTI employees can seek advice and guidance on the RTI Code of Conduct and RTI policies and procedures, as well as a means to ensure that instances of improper conduct or other irregularities are reported, investigated, and resolved. Employees may also contact the Global Human Trafficking Hotline at 1-844-888-FREE or email at help@befree.org.

3. Due Diligence

RTI's risk assessment of vendors, consultants and suppliers also includes the company's hiring practices and use of labor recruiters. Allegations or suspicions of potential violations are promptly investigated, remedied, and, if required, reported to appropriate government officials.

RTI's Global Supply Chain Office is responsible for making RTI's anti-trafficking policies known to suppliers and recruiting agents and for flowing down any trafficking-related requirements contained in RTI's contracts with our clients to both subcontractors and recruiting agents. RTI requires all subcontractors to be compliant with any applicable anti-trafficking requirements prior to the award of the subcontract and annually thereafter.

During the proposal stage, RTI performs anti-trafficking and other human rights-related screening of prospective suppliers/third parties. This includes using third party screening and monitoring software from both Amber Road or Dun and Bradstreet. RTI also follows the guidance in the United Nations

Guiding Principles on Business and Human Rights, and prioritizes for attention those suppliers with a profile presenting the most significant risks of adverse human rights impacts, whether based on the particular operations or operating context, the goods or services involved, or other factors. Based on the results of this risk assessment, certain categories of providers that require heightened pre-contract due diligence to identify any past issues, as well as post-contract monitoring are identified.

During contract performance, RTI monitors vendors and suppliers throughout the relationship for trafficking-related activities, and follows up on any red flags identified. This includes obtaining any required annual certifications as noted above. Periodic audits may also be implemented for providers of goods and services that are more susceptible to trafficking and forced labor.

RTI is responsible for the compliance of our vendors and subcontractors, and any government directed payment withholding for non-compliance will be made against our (prime) contract. RTI's AP (Accounts Payable) Supplier Intelligence and Monitoring Offices and the PM (Project Manager) are responsible for reviewing invoices while ensuring payments are properly withheld for non-compliance with the prime contract terms and conditions.

4. Assessing and Managing Risk

RTI segments suppliers into three tiers allowing RTI to develop and tailor monitoring activities to reflect the risk, criticality and type of supplier supporting RTI contract requirements. Once a supplier's tier and risk category has been determined, RTI will enter the supplier's overall classification into a system used to monitor the supplier during performance. This supplier segmentation, classification process helps RTI with identifying, managing and monitoring high risk suppliers throughout the engagement.

Risk Assessments

Risk assessments are completed internally at time of award to determine the level and frequency required to monitor a supplier's performance and progress.

Supplier Scorecards

Suppliers are monitored in four focus areas:

- Relationship (e.g., invoice accuracy, responsiveness, and communication)
- Financial (e.g., price and financial risk assessments)
- Operational (e.g., service or product quality; innovation and delivery)
- Customer satisfaction (e.g., number of complaints; number of corrective action requests).

RTI compiles performance data for selected suppliers. This selection is typically driven by spend and risk. Supply Chain Specialists administer the supplier monitoring process and periodically share this information with RTI business units and the supplier.

5. Training

In addition to reading and acknowledging the Code of Conduct, we understand the importance of additional ethics training addressing the prohibition on human trafficking. To that end, we have a robust ethics and compliance training program that includes in-person training at our corporate offices and in the field, written training documents, and online courses.

Our training emphasizes that corruption is not limited to financial or material gain, but also extends to abuse of position, conflicts of interest, cronyism, and influence by gifts or hospitality. Performing our duties in an ethical manner and in full compliance with all applicable laws is essential at RTI and any

failure to uphold these values or any violation of the Code of Conduct is serious. Our employees share our values and strive to act ethically. They also understand and are deterred by the potential of disciplinary actions, including termination and reporting to the relevant enforcement authorities that may follow from a violation.

Training specific to Anti-trafficking and Child Protection may include educating staff, contractors and vendors on prohibited conduct, recognizing signs of trafficking and forced labor, and the available reporting mechanisms. Vendors or first-tier suppliers are required through contractual provisions to provide this training to other relevant links in their supply chains.