

DOUG NYSTROM

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Dynamic leader with over 30 years at the intersection of business, law, and ethics and over 10 years of experience driving impactful human rights strategies. Proven track record of enhancing corporate responsibility and sustainability initiatives, fostering stakeholder engagement, and achieving measurable improvements in human rights performance.

PROFESSIONAL EXPERIENCE

Business & Human Rights Consultant Oct 2024-Present

Brodie Partners, London, UK
Senior Advisor Oct 2024-Present

Impactt Limited, London, UK
Senior Advisor Oct 2024-Present
Associate Director – North America Feb 2023-Oct 2024

- Provide counsel on key human rights risks to global clients including several in the Fortune 500.
- Managed high-risk, high-profile projects such as repayment of \$1.9M to over 700 workers in Saudi Arabia, and GBVH investigations into employment conditions at Jordan factories.
- Led Independent Human Rights Assessments for Belgium, the Netherlands, and Germany's bid to host the FIFA Women's World Cup 2027.

Walmart, Bentonville, AR Aug 2013-Feb 2023
Director – Human Rights/ESG Strategy & Engagement – 2019-2023

- Developed and managed ESG strategic roadmaps for product/food safety, ethics & compliance, human rights, responsible sourcing, supplier diversity, and COVID-19 response. Interacted regularly with subject matter experts on these topics across Walmart, including product safety compliance.
- Directed Walmart's human rights risk management and integration of a human rights perspective across the global enterprise.
- Led the Human Rights Working Group, a 15-member cross-functional team, to monitor human rights laws, conduct assessments, map policies, analyze ESG benchmarks, identify risks, implement mitigation strategies, and engage stakeholders.
- Published Walmart's first Human Rights Statement in 2018, enhancing transparency and stakeholder trust.
- Provided strategic oversight for Walmart's ESG agenda on high-risk issues, developing solutions across global operations and supply chains, resulting in a 25% improvement in ESG scores.
- Led the 2020-21 materiality review project to determine ESG priorities for Walmart.
- Improved Walmart's ESG scores on various benchmarks including the Corporate Human Rights Benchmark, Oxfam Supermarket Scorecard, and Fashion Transparency Index by 15% year-over-year.
- Engaged with ESG data aggregators and investment community members to address controversies and improve scores, leading to an increase in investor confidence.

Director – Human Rights, Responsible Sourcing – 2016-2019

Sr Manager – Human Rights, Responsible Sourcing – 2014-2016

Legal Consultant, Responsible Sourcing – 2013-2014

Identification, monitoring, and mitigation of high-risk human rights issues in Walmart's global supply chain

- Developed tools to identify and assess risks based on country, commodity and factory.
- Oversaw the completion of over 700 structural, electrical, and fire inspections in Bangladesh, publicly posting results to Walmart's website, and transitioning inspection oversight to the Alliance for Bangladesh Workers Safety (Alliance). Engaged in day-to-day operational issues with the Alliance like factory remediation and the Alliance hotline during the initial years of the Alliance.
- Managed an external team of attorneys to assist Walmart's Audit Assessment team in assessing thousands of social compliance audits.
- Led a revision of Walmart's Suppliers' Manual, providing suppliers with detailed protocols on how to comply with Walmart's Standards for Suppliers.

Leading Walmart's strategy for respecting human rights

- Secured executive approval for the 2025 commitment on responsible recruitment, leading a cross-functional team of 10 people to research laws and issues surrounding migrant labor in Walmart's global supply chain and develop

programmatic solutions. Conducted on-site visits across Asia, including Thailand, Malaysia, Taiwan, Bangladesh, Singapore, and China. Outcomes included engaging governments on public policy, grants from the Walmart Foundation, and a business engagement with the UN International Organization for Migration (IOM). This work resulted in a baseline assessment of all Walmart's active suppliers' facilities in Thailand and Malaysia, training for 169 managers in 110 facilities in both countries, and training for recruiters in Indonesia, Nepal, Malaysia, Cambodia, Thailand, Bangladesh, and Myanmar.

- Provided thought leadership on human rights issues for Walmart's 2025 agenda, prioritizing social issues and setting goals for the next decade of Walmart's global responsibility work.

Stakeholder advocacy and influence that delivers strategic value to Walmart's business

- Led Walmart's role in both developing and participating in the Steering Committees of the Leadership Group for Responsible Recruitment (LGRR) and the Responsible Labor Initiative (RLI).
- Increased Walmart's engagement with human rights stakeholders by over 100% between June 2016-June 2019. Engaged organizations included RLI, LGRR, Institute for Human Rights and Business, Shift Project, IOM, Issara Institute, OECD, USCIB – Labor & Employment Committee and Corporate Responsibility Committee, Ethical Trading Initiative (UK), Consumer Goods Forum, Retail Industry Leaders Association – Responsible Sourcing Workgroup, Alliance for Bangladesh Worker Safety, Verisk Maplecroft, Verite, American Apparel & Footwear Association, Transparentem, Impactt, the Interfaith Center on Corporate Responsibility, the Malaysia government, the Thai government, and human rights defenders.
- Initiated discussions with the Norwegian Council on Ethics in 2018, leading to further cross-functional engagement and subsequent removal from their "blacklist," resulting in a 0.12% stock increase on a day the market was down .21% and a \$187M position in WMT.

John Brown University, Siloam Springs, AR 2012-2016
Political Science, Adjunct Professor (Introduction to Political Philosophy class)

Nystrom Law Firm, Rogers, AR 2006-2014
Attorney

- Delivered comprehensive legal services to a diverse clientele, including international, national, and local businesses and individuals.
- Specialized in international law, business law, government compliance, labor and employment, tax, complex commercial transactions, real estate, contracts, multinational corporate formation, intellectual property, and estate planning.

Arvest Bank Group, Fayetteville, AR 2007-2012
Database Marketing, Commercial Marketing Consultant

- Utilized data, analytics, and reporting to craft marketing strategies, provide insights, and guide the development of new products for business clients at this Walton-family-owned regional bank with over \$12B in deposits. Presented strategies and metrics to senior executives, including Chairman/CEO, Jim Walton, through presentations, training sessions, and one-on-one meetings.
- Created metrics to monitor progress and boost sales and services per household, producing over 50 actional reports on a monthly, quarterly, and annual basis.
- Led a team to develop a website for small business customers (Arvest Small Business Resource Center—www.arvestbiz.com) and authored a weekly blog for small businesses.

Retail Capital Group, LLC, Bentonville, AR 2006-2007
Corporate Counsel/Chief Financial Officer

- Directed legal and financial operations for this national commercial real estate company and its two affiliates, managing 46 shopping center properties across 20 states, valued at over \$100M. Contributed to strategic vision and developed processes to achieve strategic goals.
- Renegotiated over \$90M in commercial real estate financing, saving the company \$325K.
- Restructured and enhanced the company's accounting system to improve tracking and monitoring of monthly accounts receivables from 200+ tenants and accounts payable to 150+ vendors.

Coral Ridge Ministries, Fort Lauderdale, FL 2005-2006
Corporate Counsel/Chief of Staff

- Oversaw legal, public policy, financial, and human resource functions for 12-member public policy NGO focused on various national human rights issues, managing a \$1.2M operating budget. Established a lobbying office in Washington, DC, and ensured compliance with lobbying and political campaigning laws.
- Monitored legislation and government policies to formulate public policy strategies on human rights issues, including grassroots initiatives, lobbying efforts with the White House and Congress, and public relations campaigns.

Martin Attorneys, P.A., Springdale, AR 2003-2005
Managing Attorney, Bankruptcy Department

- Supervised the bankruptcy department, consisting of 4 attorneys, 4 paralegals, and 3 assistants. Represented corporate and individual clients in over 300 bankruptcy cases.

Children First America, Bentonville, AR 2001-2003
Corporate Counsel/V.P., Finance and Administration

- Managed legal and financial operations for a \$10M NGO advocating for educational opportunities. Ensured compliance with lobbying and government regulations. Reported to a high-profile national Board, that included the late John Walton and former Secretary of Education, Betsy DeVos.
- Contributed to drafting a successful *amicus curia* brief in *Zelman v. Simmons-Harris*, where the U.S. Supreme Court ruled that publicly-provided school vouchers did not violate the 1st Amendment Establishment Clause of the U.S. Constitution.

Bouhan, Williams & Levy and Union Camp Paper Corp, Savannah, GA 1989-1992
Attorney—Commercial Litigation and Corporate Counsel

EDUCATION

****The University of Georgia School of Law, Athens, GA****

Juris Doctorate (International Law Focus) 1989

- Executive Editor, *Georgia Journal of International & Comparative Law* (1988-1989)

****Baylor University, Waco, TX****

Bachelor of Business Administration (Finance and Accounting) 1986

****Westminster Theological Seminary, Philadelphia, PA****

Master of Divinity (Ethics & Philosophy Concentration) 1995

THOUGHT LEADERSHIP HIGHLIGHTS

Administrative Leadership

- Member, Steering Committee, Responsible Labor Initiative, Responsible Business Alliance (RBA), 2017-2019
- Member, Steering Committee, The Leadership Group for Responsible Recruitment, The Institute for Human Rights and Business (IHRB), 2016-2019
- Member, GRI-RLI Task Force on Tackling Modern Slavery Reporting Indicators, 2018

Written Leadership

- “It’s hard to believe that forced labor exists in the world today, but it does,” Thomson-Reuters Foundation News, 25 APR 2017 (www.cms.trust.org/item/20170425101207-brnhp)
- Author, *The Effects of the New EEC Insider Trading Directive*, 18 *GA. J. INT’L. & COMP. LAW* 119 (1988)

Oral Leadership

- Panelist, “Removing Unfair Labor Practices from the North American Supply Chain.” American Chamber of Commerce – Mexico, Monterrey, Mexico, 12 FEB 2024
- Speaker, “Forced Labor – Observations from the Field.” Joint Forced Labor Working Group – Retail Industry Leaders Association (RILA), American Apparel & Footwear Association (AAFA), National Retail Federation (NRF), and

- United States Fashion Industry Association (USFIA), Virtual, 18 JAN 2024
- Speaker, “Enhanced Practices for Supply Chain Transparency.” USFIA, Virtual, 28 MAR 2023
 - Workshop Participant, “Indicators of Corporate Leadership, Governance and Rights-Respecting Culture.” The Valuing Respect Project, Shift, Virtual, 10 JUL 2020
 - Workshop Participant, “Human Rights Risks Inherent in Business Models.” The Valuing Respect Project, Shift, Virtual, 2 JUL 2020
 - Panelist, “The Role of Retailers in Driving Responsible Business Conduct in Supply Chains.” 2019 Annual RBA Conference, Responsible Business Alliance, Santa Clara, CA, 21 OCT 2019
 - Panelist, “Applying Leverage in Responsible Business Conduct: Success Stories in Driving Change.” 2019 Annual RBA Conference, Responsible Business Alliance, Santa Clara, CA, 22 OCT 2019
 - Panelist, “Expert Panel—Perspectives and Experiences with Responsible Recruitment.” Round Table for Responsible Recruitment, Stronger Together US, West Palm Beach, FL, 27 SEP 2019
 - Panelist, “Migrant Workers and Ethical Recruitment—Mexican Perspective.” RBA Outreach Meeting, Responsible Business Alliance, Guadalajara, Mexico, 5 SEP 2019
 - Government Meeting Participant, Strategic Dialogue with Government of Malaysia (5 Malaysia Ministries), Topic: How to drive responsible recruitment in Malaysia, Kuala Lumpur, Malaysia, 17 JUL 2019
 - Panel Moderator, “Business Actions: Leverage and Limitations.” Driving Responsible Recruitment in Asia (Malaysia Roundtable), Joint Meeting of Consumer Goods Forum, the Leadership Group for Responsible Recruitment and Responsible Business Alliance, Kuala Lumpur, Malaysia, 16 JUL, 2019
 - Government Meeting Participant, 2019 Global Forum on Responsible Recruitment Strategic Dialogue with Government of Thailand (3 Thailand Ministries), Topic: How to drive responsible recruitment in Thailand, Bangkok, Thailand, 10 JUL 2019
 - Workshop Participant, “Expert Consultation on Valuing Respect.” The Valuing Respect Project, Shift, New York, NY, 1 MAY 2019
 - Workshop Participant, Circle of Innovators, Institute for Human Rights and Business, New York, NY, 15-16 NOV 2018
 - Panelist, “Progress, Challenges and Opportunities in Implementing Anti-Trafficking and Forced Labor Standards in Supply Chains.” 2018 Annual RBA Conference, Responsible Business Alliance, Santa Clara, CA, 31 OCT 2018
 - Panelist, “Impact of Faith-based SRI Investors on Corporations.” Seventh Generation Interfaith Coalition for Responsible Investment (Frank Sherman, ICCR), Milwaukee, WI, 16 OCT 2018
 - Panelist, “Responsible Recruitment: Tackling Forced Labor at the Root.” Innovation Forum, Podcast, 23 AUG 2018
 - Keynote, “Ethical Recruitment of Migrant Workers: Challenges in Securing Sustainable Labor Supply Chains in Taiwan.” European Chamber of Commerce Human Rights and Corporate Social Responsibility Committee Meeting, Taipei, Taiwan, 15 JUN 2018
 - Panelist, “Are We Moving Fast Enough? What Are the Markers?” 2018 Global Forum on Responsible Recruitment, The Leadership Group on Responsible Recruitment and Consumer Goods Forum, Singapore, Singapore, 11 JUN 2018
 - Keynote, “Supporting the Dignity of Workers in the Supply Chain.” 2nd Annual Soderquist College of Business “Working for the Common Good” Series, John Brown University, Siloam Springs, AR, 12 MAR 2018
 - Keynote, “Walmart’s Responsible Sourcing Program.” Women in Engineering at the University of Arkansas, Fayetteville, AR, 12 FEB 2018
 - Panelist, “Global Buyer Perspectives: Evolving Ethical Supply Chain Governance in New Regulatory Regimes.” 1st Annual Issara Global Forum, Bangkok, Thailand, 8 NOV 2017
 - Panelist, “Effective Strategies to Prevent Forced Labor in Supply Chains.” 2017 Fall Conference, American Bar Association Section of International Law, Miami, FL, 27 OCT 2017
 - Panelist, “What/Where are the Best Opportunities for Collaboration?” Conference on Labor Standards and Management Systems in the Apparel and Footwear Industries: Building a New, More Sustainable and Just Business Model for the 21st Century, Brown University and Nike, Providence, RI, 9 JUN 2017
 - Participant, “Leadership Circle.” Responsible Business Alliance, 22-24 MAY 2017
 - Panelist, “Cleaning Supply Chains from Forced Labor.” 2017 Trust Conference America Forum, Thomson Reuters Foundation, Washington, DC, 25 APR 2017
 - Panelist, “The Use of Technology to Combat Forced Labor in Supply Chains.” 2016 SRI Conference on Sustainable, Responsible, Impact Investing, SRI Conference & Community, Denver, CO, 11 NOV 2016