

## **CIDRZ Anti-Trafficking Compliance Plan**

### **Background and Purpose**

CIDRZ has developed this Model Anti-Trafficking Compliance Plan (“Plan”) in accordance with the U.S. Government’s zero-tolerance policy regarding trafficking in persons by government contractors and award recipients, as set out in FAR Subpart 22.17 and 52.222-50(h), and in USAID Standard Provision M20 for U.S. Nongovernmental Organizations (“Anti-Trafficking Provisions”).

The purpose of this Plan is to set out CIDRZ’s policies and procedures for: (1) making CIDRZ employees aware of the conduct prohibited under CIDRZ and the actions that may be taken against employees for violations; (2) employing fair recruitment, salary/wage and remuneration practices; and (3) preventing prohibited trafficking activity by suppliers, subcontractors and subrecipients, and monitoring, detecting and terminating those who engage in such activities.

### **Applicability**

This Plan sets out CIDRZ baseline standards for anti-trafficking compliance and applies presumptively to all U.S. Government contracts, subcontracts, cooperative agreements, awards and subawards. However, it may need to be adapted or modified for projects that are larger, more complex, or involve greater risk of trafficking activity. For all contracts and awards with an estimated value of \$500,000 or more, or involve activities outside the U.S., Project staff must examine each one individually to assess the risk of trafficking activity, based on factors such as the number of non-U.S. citizens to be employed and whether the contract or award will involve services or supplies susceptible to trafficking in persons. Project staff must adapt or modify the Plan as necessary to ensure that it is appropriate to the size and complexity of the contract or award and the nature and scope of the activities to be performed.

### **Employee Awareness Program**

CIDRZ will update its Human Resource (HR) policy to include all required components of the USAID Standard Provision M20 by 31 March 2025. This revised section will reflect the Anti- Trafficking Provisions’ prohibiting trafficking-related activities, describe the actions CIDRZ may take against employees and agents who violate the Policy, and sets out the procedure for reporting and investigating Policy violations. CIDRZ will review the HR policy to ensure all clauses set out in FAR Subpart 22.17 and 52.222-50(h) and in USAID Standard Provision M20 are covered. If amendments are needed, they will be led by the HR department and approved by the CIDRZ Board.

CIDRZ posts all policies and code of ethics and conduct on CIDRZ intranet, where they can be accessed by all CIDRZ personnel at any time.

Upon any revisions, all CIDRZ personnel will be notified of the new Policy via a company-wide email containing a link to the Policy on CIDRZ intranet and attached to the email with instructions to access and review the Policy. Thereafter, CIDRZ will send annual email reminders to all personnel directing them to review the Policy on CIDRZ intranet and summarize any Policy updates.

All new personnel are required to read and acknowledge the Policy and the Code at the time of hire and must also complete an on-line training program on the Code.

CIDRZ will commence periodically conducting specialized training on the Anti-Trafficking Provisions, the Policy and the Compliance Plan on an as-needed basis.

## **Recruitment, Salary/Wage and Remuneration Plan**

CIDRZ prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. CIDRZ employees must fully and accurately provided, in a format and language accessible to the employee, all key terms and conditions of employment, including wages and benefits, work location, living conditions, housing and associated costs (where provided or arranged by CIDRZ), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

CIDRZ prohibits the use of recruiters that do not have trained employees, or that do not comply with all labor laws of the country where the recruitment takes place.

CIDRZ prohibits charging recruitment fees to any employee. CIDRZ issues social media posts frequently (at a minimum quarterly) reminding the public of this policy.

CIDRZ will pay all employees' salaries/wages that meet applicable host-country legal requirements or will explain any variance.

CIDRZ will provide every employee with an employment contract, written in a language the employee understands, containing all required information about the terms of conditions of employment, which includes, the work description, salaries/wages, work location, living accommodation and associated costs, if applicable, leave/time off, transportation arrangements, grievance process. If the employee must relocate to perform the work, CIDRZ will provide the relocation allowances to be paid to the employees according to the HR manual.

CIDRZ prohibits destroying, concealing, confiscating or otherwise denying any employee access to his or her identity or immigration documents, as required under Zambian law.

CIDRZ will provide or pay the cost of return transportation at the end of employment for any employee who is not a national of the country where the work took place and was brought into that country by CIDRZ for purposes of working on a covered US Government contract or award unless the employee becomes a resident of the country, which under Zambian law transitions the employee to local contract.

CIDRZ will provide or pay the cost of return transportation at the end of employment for any employee who is not a US national and was brought into the US for purposes of working on a covered US Government contract or award, if payment of such costs is required under existing temporary work programs or pursuant to a written agreement with the Worker for portions of contracts and awards performed outside the US.

## **Housing Plan**

In situations where CIDRZ provides housing to employees, the housing will meet host country housing and safety standards.

## **Supplier Compliance**

All CIDRZ contractors, consultants, vendors, suppliers, subcontractors and subrecipients ("Suppliers") will be oriented on the required Anti-Trafficking Provisions and will be requested to agree to comply with the Policy and all applicable Anti-Trafficking Provisions. CIDRZ will include language to that effect in all USAID supplier contracts, subcontracts and subagreements ("Supplier Contracts"), including inserting FAR

52.222-50, FAR 52.222-56 and USAID Standard Provisions where applicable.

All CIDRZ Suppliers will be oriented on the need for a compliance plan to prevent prohibited trafficking-related activities and to monitor, detect and terminate any of its contractors, consultants, suppliers, subcontractors or subrecipients engaging in prohibited trafficking-related activities, and provide a copy of its plan to CIDRZ. The Supplier's compliance plan must meet the minimum requirements in the Anti-Trafficking Provisions and be appropriate to the size and complexity of the contract, subcontract or sub agreement with CIDRZ and the nature of the activities to be performed under it.

CIDRZ will work with all Supplier Contracts, and on an annual basis thereafter, all CIDRZ Suppliers must submit a certificate to CIDRZ:

- That the Supplier has implemented a compliance plan and has complied with its plan such a compliance plan; and
- That after conducting due diligence, to the best of the Supplier's knowledge and belief, neither it nor any of its employees, or its contractors, consultants, suppliers, subcontractors, subrecipients or their employees, have engaged in any prohibited trafficking-related activities, or if any abuses relating to prohibited trafficking-related activities have been found, Supplier has taken appropriate remedial and referral actions.

For Suppliers and Supplier Contracts that may be more susceptible to trafficking-related activities, CIDRZ Compliance Office may, in situations where it has direct access, inspect the Supplier's workplace or any housing provided by the Supplier for signs of trafficking-related activities. In lower-risk situations, and in situations where the Supplier is distant, CIDRZ will review the plans and certifications of its Suppliers to ensure they include adequate monitoring procedures and reporting mechanisms.

If any Supplier fails to comply with the Policy or applicable Anti-Trafficking Provisions, CIDRZ will take appropriate action to remediate the violation and prevent future violations, including, but not limited to:

- Requiring the Supplier to remove an employee or agent from a project
- Requiring the Supplier to terminate its relationship with any Supplier contractor, consultant, supplier, subcontractor or subrecipient
- Suspending payments to Supplier until violation is remedied
- Immediately terminating the Supplier Contract

### **Reporting Requirements and Procedure**

All CIDRZ personnel, Suppliers and Supplier Personnel are required to report any suspected trafficking-related activity or violation of this policy to CIDRZ. Reports may be made via CIDRZ's anonymous and confidential whistleblowing services provided through [www.cidrz.org/ceo-drop-box](http://www.cidrz.org/ceo-drop-box) and the CIDRZ compliance hotline +260965229373 to report non-compliance and unethical incidents in the organisation. In addition, reports may be made to any CIDRZ supervisor, manager, leadership team member, or executive officer. Any CIDRZ supervisor, manager, leadership team member, or executive officer who receives such a report is required to immediately forward the report to CIDRZ Office of Risk and Compliance and Internal Audit.

CIDRZ personnel and Supplier Personnel who believe they or others have been subjected to prohibited trafficking-related activities may report the activity as outlined above, or may contact the Global Human Trafficking Hotline at 1-844-888-FREE or [help@befree.org](mailto:help@befree.org).

Human Resources will investigate all reports of prohibited trafficking-related activity or violations of this policy and take appropriate action. The Office of Risk and Compliance and Internal Audit will make all required notifications to government agencies.

CIDRZ strictly prohibits retaliation against any CIDRZ employee who reports prohibited trafficking-related activity or other violations of this policy, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. CIDRZ personnel who engage in any form of retaliation against those who report prohibited trafficking-related activities or other violations of this policy are subject to disciplinary action, up to and including termination of employment with CIDRZ.

### **Investigations**

If CIDRZ receives credible information from an employee report or any other source alleging prohibited trafficking-related activity, the CIDRZ Risk and Compliance Office and Internal Audit department will investigate and report its findings and determine what, if any, remedial action is appropriate. The Internal Audit department will also monitor CIDRZ management's implementation of such remedial action.

The CIDRZ Risk and Compliance Office will be responsible for immediately notifying the contracting officer and the appropriate agency Inspector General of the information received and any resulting remedial action taken.

CIDRZ will cooperate fully with any US Government agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including, but not limited to, providing timely and complete responses to document requests, and providing reasonable access to CIDRZ facilities and staff.

CIDRZ will protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited and will not prevent or hinder these employees from cooperating fully with US government authorities.

### **Posting**

CIDRZ will post this Plan on the CIDRZ intranet and on its external website, [www.cidrz.org](http://www.cidrz.org).