

CUAMM Anti-Trafficking Compliance Plan

Background and Purpose

Doctors with Africa CUAMM (“CUAMM”) has developed this 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 for U.S. Nongovernmental Organizations (“Anti-Trafficking Provisions”).

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

Applicability

This Plan sets out CUAMM’s baseline standards for anti-trafficking compliance and applies presumptively to all contracts, subcontracts, cooperative agreements, awards and sub awards. 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, Project staff must examine each one individually to assess the risk of trafficking activity, based on factors such as 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

CUAMM has adopted several policies that reflect the Anti Trafficking Provisions’ prohibiting trafficking-related activities, describe the actions CUAMM may take against employees and agents who violate them, and set out the procedure for reporting and investigating policies violations. The Policy is also summarized in CUAMM’s Code of Ethics and Conduct (the “Code”).

CUAMM stored both the policies and the Code on its internal server, where they can be accessed by all CUAMM personnel at any time. Furthermore, the policies are published on the official website of the organization following this link: <https://doctorswithafrica.org/en/who-we-are/organization/organization/>.

Upon initial adoption, all CUAMM personnel will be notified of the new Policy via a company-wide email containing a link to the Policy location in the server with instructions to access

and review it. Thereafter, CUAMM will send periodic email reminders to all personnel directing them to review the policies when needed and summarizing any policies updates. All new personnel are required to read and acknowledge the policies and the Code at the time of hire.

CUAMM could also periodically conduct specialized training on the policies on an as-needed basis.

Recruitment and Wage Plan

CUAMM prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. CUAMM employees must fully and accurately disclose, in a format and accessible language 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 CUAMM), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

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

CUAMM prohibits charging recruitment fees to any employee.

CUAMM will pay to all employees' wages that meet applicable host-country legal requirements, or will explain any variance.

Where required by law or contract, CUAMM will provide to every employee an employment contract, recruitment agreement or other required work document, written in a language the employee understands, containing all required information about the terms of conditions of employment, which may include, by way of example, the work description, wages, work location, living accommodations and associated costs, time off, transportation arrangements, grievance process, the content of applicable laws and regulations prohibiting trafficking in persons, and the prohibition on recruitment fees.

CUAMM prohibits destroying, concealing, confiscating or otherwise denying any employee access to his or her identity or immigration documents.

CUAMM 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 CUAMM for purposes of working on a covered contract or award.

Housing Plan

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

Supplier Compliance

For Suppliers and Supplier Contracts that may be more susceptible to trafficking-related activities, CUAMM 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, CUAMM 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 policies or applicable Anti-Trafficking Provisions, CUAMM 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 sub recipient
- Suspending payments to Supplier until violation is remedied
- Immediately terminating the Supplier Contract

Reporting Requirements and Procedure

All CUAMM personnel, Suppliers and Supplier Personnel are required to report any suspected trafficking related activity or violation of this policy to CUAMM. Reports may be made to CUAMM HQ representatives.

HQ representatives will investigate all reports of prohibited trafficking-related activity or violations of this policy and take appropriate action.

CUAMM strictly prohibits retaliation against any CUAMM employee who reports prohibited trafficking related activity or other violations of this policies, or who cooperates with any internal or government investigations of such reports. Employees may do so without fear of reprisal. CUAMM personnel who engages 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 CUAMM.

Investigations

If CUAMM receives credible information from an employee report or any other source alleging prohibited trafficking-related activity, the HQ responsible will conduct an investigation and report its findings and determine what, if any, remedial action is appropriate.

The HQ responsible will be in charge for immediately notifying the director and the appropriate supervisors of the information received and any resulting remedial action taken. CUAMM will cooperate fully with any agencies responsible for any investigations, audits or corrective actions relating to trafficking in persons, including, but not limited to, providing



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timely and complete responses to document requests, and providing reasonable access to CUAMM facilities and staff.

CUAMM 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 authorities.

Posting

CUAMM will post this Plan in the internal server and at workplace, except where the work is being performed in the field or not otherwise at a fixed location.

Padua, 9th Sept. 2020