

## CENTRE FOR CATALYZING CHANGE

### *ANTI SLAVERY AND ANTI HUMAN TRAFFICKING POLICY STATEMENT*

CENTRE FOR CATALYZING CHANGE (C3) commitment to human rights focuses on subjects such as forced labor, slavery, child labor and human trafficking and thereby C3 is committed to ensure that its employees, consultants, sub recipients and subcontractors take appropriate steps to mitigate the risk of human trafficking and slavery in any part of its program/ projects.

### ORGANISATION'S STRUCTURE

Centre for Catalyzing Change (C3) formerly CEDPA India, is a nongovernmental organization that improves the lives of women and girls in India. Through local partnerships and programs, C3's proven approach to development gives women, young girls and boys the tools they need to improve their lives, as well as that of their families and communities. Our programs focus on increasing educational and livelihood opportunities for adolescent girls, ensuring access to lifesaving reproductive health information and services, and strengthening people's ability to become leaders in their communities and the nation.

### VISION

We envision a future in India where women and girls are fully empowered and enabled to realize their rights, opportunities and achieve gender equality.

### MISSION

We equip, mobilize, educate and empower women and girls to achieve gender equality.

### POLICIES

C3 is committed to ensure that there is no modern slavery or human trafficking in any part of our business. C3 has internal policies and practices which focus on slavery and human trafficking and is part of a transparency and accountability and respect for human rights. C3 has taken multiple actions to verify the absence of forced labor, slavery and human trafficking in and part of our business.

### ADHERENCE TO C3'S VALUES

C3 has zero tolerance to slavery and human trafficking. C3 expects all of those associated with C3 including its employees, partners and contractors to adhere and comply with C3's values. The legal and compliance, human resources are responsible for ensuring compliance across the organization.

## **The Compliance Plan**

The purpose of this Plan is to set out C3's policies and procedures for:

- (1) Making C3 employees aware of the conduct prohibited under C3 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 partners, subcontractors and sub-recipients, and monitoring, detecting and terminating those who engage in such activities.

## **Scope**

This Plan sets forth C3 standards for anti-trafficking compliance and applies presumptively to all contracts, subcontracts, 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 factor 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.

C3 has adopted the policy on Combating Trafficking in Persons ("Policy") that reflects the Anti-Trafficking Provisions' provisions prohibiting trafficking-related activities, describes the actions C3 may take against employees and agents who violate the Policy, and sets out the procedure for reporting and investigating Policy violations..

Both the Policy and this Plan are posted on C3's intranet MITR where they can be accessed by all personnel at any time.

Upon initial adoption, C3 notifies personnel of the new Policy via an email containing a link to the Policy on *MiTR* with instructions to access and review the Policy.

All new personnel are required to read and acknowledge the Policy at the time of hire, including its anti-trafficking provisions.

C3 also will periodically conducts specialized training on the Anti-Trafficking Provisions, the Policy and the Plan on an as-needed basis.

## **C3 Recruitment and Wages**

C3 prohibits the use of any misleading or fraudulent recruitment practices during the recruitment of employees or offering of employment to employees. C3 fully and accurately discloses, 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 C3), significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work.

C3 prohibits the use of recruiters that do not have trained employees, or that do not comply with all labor laws of the India.

C3 prohibits charging recruitment fees to any employee.

C3 will pay to all employees such wages that meet applicable legal requirements, or will explain any variance.

Where required by law or contract, C3 will provide to every employee an employment 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. If the employee must relocate to perform the work, C3 will facilitate the obtainment of, and cover the cost of, the required work document prior to relocation.

C3 prohibits destroying, concealing, confiscating or otherwise denying any employee access to his or her identity or immigration documents.

## **Partners Compliance**

All C3 contractors, consultants, vendors, partners, subcontractors and sub-recipients ("Suppliers") must agree to comply with the Policy and all applicable Anti-Trafficking Provisions. C3 will include language to that effect in all purchase orders, subcontracts and sub-agreements ("Supplier Contracts").

C3 offices will make all Suppliers aware of C3's Anti-Trafficking Policy. All contractors and sub-recipients being contracted for an amount \$500,000 or greater are required to have a compliance plan to prevent prohibited trafficking-related activities and to monitor, detect and terminate any of its contractors, consultants, suppliers, subcontractors or sub-recipients engaging in prohibited trafficking-relating activities, and reserve the right to request a copy of said plan to C3. 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 C3 and the nature of the activities to be performed under it.

C3 offices may request, prior to the award of any Supplier Contract, and on an annual basis thereafter, all C3 Suppliers contracted for an amount \$500,000 or greater to submit a certification to C3:

- 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, sub-recipients 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, C3 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, C3 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, C3 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 C3 personnel, Suppliers and Supplier Personnel are required to report any suspected trafficking-related activity or violation of this policy to C3.

C3 employees are strongly encouraged to report any violation of this policy directly to the C3's Executive Director or Director- Operations, as both are effective and expeditious means of addressing the required reporting of potential violations. In addition and in the case of suppliers/ contractors and their personnel as well as C3 employees, reports may be made to any of C3 Senior Advisor(s). Any C3 Senior Advisor who receives such a report is required to immediately forward the report to C3 Executive Director/ Director -Operations. Supplier Personnel who believe they or others have been subjected to prohibited trafficking-related activities may report the activity as outlined above. Reports may also be made via C3 anonymous compliance by an email at [atp@c3india.org](mailto:atp@c3india.org) or at telephone no - 91-11-474 88888

Human Resources will investigate all reports of prohibited trafficking-related activity or violations of this policy and take appropriate action. The Executive Director will make all required notifications to government agencies, as more fully set out in this Compliance Plan.

C3 strictly prohibits retaliation against any C3 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. C3 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 C3.

## **Follow-up on Reported Violations**

If C3 receives credible information from an employee report or any other source alleging prohibited trafficking-related activity, C3 Director- Operations will conduct an investigation and report its findings and determine what, if any, remedial action is appropriate. The C3 Executive Director will monitor C3 management's implementation of such remedial action.

The Executive Director will be responsible for immediately notifying the appropriate authority of the information received and any resulting remedial action taken.

C3 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 C3 facilities and staff.

C3 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

## **Notification**

C3 will post this Plan and Policy on its intranet - <https://mitr.c3india.org> (*MiTR*) and the Policy on its external website: [www.c3india.org](http://www.c3india.org).