

## REQUEST FOR PROPOSAL (RFP)

Date of Issuance: **20<sup>th</sup> March 2023**  
Closing Date for Questions: **28 March 2023, 17hr**  
Closing Date for Submission of Application: **31 March 2023, 17hr**

Subject: **Request for Proposal No.1 2023 – 01 Entitled  
“Development of Training Manual on Human  
Rights and the Parish Development Model”**

Dear Sir/ Madam,

You are kindly invited to submit a technical and financial proposal relating to **CEFROHT’ project on Integrating a HRBA for women in implementing the Parish Development Model in Tororo and Mukono districts in Uganda Proposal No. 2023 – 01** (with Appendices) hereby referred to as **the Project**. All related correspondence for this proposal should be sent to: [info@cefroht.org](mailto:info@cefroht.org) copied [jnyapendi@cefroht.org](mailto:jnyapendi@cefroht.org).

- Costs incurred by respondents for the preparation of a proposal and the negotiation of contract are not reimbursable.
- The project is not bound to accept any of the proposals submitted.
- The project reserves the right to accept any offers of proposal without further discussion.
- The project will only evaluate proposals from licensed firms or qualified personnel to implement and complete the work under this project.
- The Offers must be able to complete the assignment stated in the Statement of Work.

All questions and inquiries related to this request must be submitted prior to the Closing Date for questions shown above for this RFP. All “Offerors” must submit their questions to **the Project** via the below email address:  
[info@cefroht.org](mailto:info@cefroht.org) copied [jnyapendi@cefroht.org](mailto:jnyapendi@cefroht.org).

The subject line should read: **“Questions for RFP No. 2023 – 01”**

In compliance with standard procedure, all inquiries and comments will be shared with the rest of the Offerors along with the Project’s response. Questions received after the closing date for Questions may not be answered.

## Assignment Instructions

The Offeror shall submit its best price offer/proposal in accordance with the Statement of Work (SOW) and shall contain the following:

1. **Proposal Cover Letter** signed by a person authorized to sign on behalf of the Offeror;
2. **Technical Approach/Proposal** for completing the deliverables in the SOW;
3. **Summary of Relevant Experience.** Offerors should list current and previous relevant projects;
4. **At least two Performance References for similar work;**
5. **Budget** Offerors must use budget template in Attachment B
6. **Budget narrative** Offerors must explain the rationale behind the numbers.

### Submittal requirements:

Proposals shall be delivered at Center for Food and Adequate Living Rights offices located on plot 66-67 Kiriwawanvu lane, GACCETA Estate, Gayaza-Kalagi Road, Wakiso District.

- The Subject line of the application should read: **“Submission to RFP No. 2023 – 01,”**
- Proposals received after the exact time specified for receipts of offer shall be considered late and shall not be evaluated.

Respondents shall receive an email acknowledging that their Proposal has been received upon its submission.

Appendix A: Statement of Work

Appendix B: Budget Template

Appendix C: Suggested Proposal Format

Appendix D: Proposal Evaluation Criteria

**Appendix  
(A)  
Statement  
of Work**

**I. BACKGROUND & CONTEXT**

Women and youths in Uganda are disproportionately affected covid-19 distortions<sup>1</sup> and economic exclusion. They are not legally empowered<sup>2</sup> to challenge and demand for accountability.<sup>3</sup> As indicated in the JLSO report above, 90% of the women in Uganda are not legally empowered. Government developments ought therefore to embrace the Human Rights Based Approach with its principles, including, participation, accountability, transparency, equality and non-discrimination, dignity, and rule of law. More to that, the design of the parish Development Model will be delivered through Cooperative Societies (SACCOs). These are also a creature of law-the Cooperative Societies Act and the legal framework of the Constitutions, the Local Government Act and the Human Rights Enforcement Act. However, performance of SACCOs in Uganda has been very poor. For example, according to the report by the Project of Financial Inclusion in Rural Areas-PROFIRA<sup>4</sup>, 64 out of the 453 registered SACCOs in Uganda have collapsed while 312 are struggling due to fraud and poor governance among other challenges and only 77 out the 453 Saccos they are supporting have not suffered any problem. The only remedy to this is, the human rights-based approach where the rights holders know and understand their rights and how to pursue them and the leaders understand their obligations. The terms of engagement must be clear to all the parties especially women who are vulnerable.

Women are largely economically and socially excluded and have limited or no access to justice for economic rights. It should be noted that in many East African countries, Human Rights enforcement is bundled up with other technical, expensive and onerous legal procedures with capitalist tendencies that have no forbearance for the majority poor women and youths. There is need to have a paradigm shift towards an enabling legal framework for economic, land and livelihood rights especially in implementing the Parish Development Model.

This situation is more pronounced for women as more households are recently headed by women-whether expressly or impliedly.<sup>5</sup> For example, the Uganda Bureau of Statistics report of 2020 shows that, about one in every ten female children (15-17 years) have ever been married while the corresponding proportion for their male counterparts was less one percent implying the big sex differentials of age at marriage<sup>6</sup>. Starting this project in these two districts will therefore offer the possibility of scalability. Women's deprivation and

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<sup>1</sup> See UNDP: COVID-19 Scenarios for short, medium, and longer-term socioeconomic impacts. Available at

<sup>2</sup> See East and Horn of Africa: Impact of Legal Empowerment on People Centered Justice, available at <https://community.namati.org/t/east-and-horn-of-africa-impact-of-legal-empowerment-on-people-centred-justice/81778>

<sup>3</sup> See Hiil reports on Uganda, Kenya and Tanzania (<https://www.hiil.org/news/justice-that-works-for-uganda>, <https://www.hiil.org/projects/justice-needs-and-satisfaction-in-kenya/>,

<sup>4</sup> SACCOs in Uganda suffer fraud, poor governance: Financial Inclusion in Rural Areas-PROFIRA. Available at <https://www.ifad.org/documents/38711624/40089498/Uganda+1100001630+PROFIRA+Supervision+Report+May+2021.pdf/74362008-cb9d-33ef-0ca6-76dae0d5fceb?t=1628674856615>

<sup>5</sup> See the UGANDA NATIONAL HOUSEHOLD SURVEY 2019/2020 REPORT, available at [https://www.ubos.org/wp-content/uploads/publications/09\\_2021Uganda-National-Survey-Report-2019-2020.pdf](https://www.ubos.org/wp-content/uploads/publications/09_2021Uganda-National-Survey-Report-2019-2020.pdf)

<sup>6</sup> See UBOS: 2020 STATISTICAL ABSTRACT. Available at [https://www.ubos.org/wp-content/uploads/publications/11\\_2020STATISTICAL\\_\\_ABSTRACT\\_2020.pdf](https://www.ubos.org/wp-content/uploads/publications/11_2020STATISTICAL__ABSTRACT_2020.pdf)

exclusion is manifold and ranges across the economic, social and political arenas<sup>7</sup>. The youths are equally into this conundrum. Far too many youths especially the adolescent girls and young women are largely alienated and marginalized, and struggle to access public resources and quality social services. They are barely involved in policy formulation and programme design as their participation in decision-making is limited and often ad hoc.<sup>8</sup>

In its community engagements under the community empowerment program in the districts of Mukono and Kaliro, CEFROHT has identified that community members especially women (although knowing and hearing about the PDM in local markets and radio stations), do not understand their rights and roles in the implementation of the PDM. The community members also have barely been engaged through community meetings by the PDM committees and their leaders to understand the PDM and how to access the community benefits within it. Communities do not also know channels through which to engage their community leaders on PDM and to hold them accountable for violating their rights within the PDM. Nonetheless, all this not yet documents as evidence to guide action and realisation of the objectives of the PDM. It is therefore on this basis that CEFROHT seeks to implement a project to use legal empowerment and social accountability to promote financial inclusion and livelihoods especially among women and youth in the PDM.

To guarantee inclusive development and improved quality of Life of Ugandans, women must be prioritized and a human rights-based approach in the parish development model will assist the realization of economic rights and respect for human dignity hinged on the five key principles including, participation, accountability, transparency, equality and non-discrimination, dignity, and rule of law. These reinforce a promise to a world where everyone's right to human dignity is respected and protected. Winning strategies must therefore be innovated to involve women and youths to improve their quality of life and free the potential of each person for wealth creation and effective participation.

For this to happen, there is need to be implemented within the parish development model; Legal empowerment, social accountability and human rights procedures- for the people especially women to claim, advocate for and demand for accountability in the implementation of the parish development model and sustainable livelihoods as indispensable components of their existence, dignity and aspirations. These are critical pathways for sustainable development, improved quality of Life, women inclusive growth, and sustainable wealth creation and rule of law.<sup>9</sup> These concepts and approaches are anchored in human rights law where universal entitlement to all the rights to satisfy their basic needs, such as property, income, food, housing rights are guaranteed.<sup>10</sup> The realization of these rights confers power in human life manifested in land, property, money, food, economic activities and survival which all together are protected as a right to adequate living<sup>11</sup>.

At the heart of a Human Rights Based Approach is the recognition that unequal power relations and social exclusion deny people their human rights and keep them in poverty. Under the plan, there has now been shift from a sector approach to programs and introduction of the Parish Development Model (PDM) as an

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<sup>7</sup> See, A review of women, poverty and informal trade issues in East and Southern Africa, available at International Science Journal-  
<https://onlinelibrary.wiley.com/doi/10.1111/j.1468-2451.2005.549>.

<sup>8</sup> United Nations Economic Commission for Africa: Africa's youth and prospects for inclusive development Regional situation analysis report. Available at  
<https://www.ohchr.org/sites/default/files/Documents/Issues/Youth/UNEconomicCommissionAfrica.pdf>

<sup>9</sup> See UN Commission on Legal Empowerment of the poor (2015).

<sup>10</sup> See Universal Declaration of Human Rights (UDHR 1948).

<sup>11</sup> See UDHR 1948.

implementation vehicle for the Uganda National Development Plan III. There is therefore need for the implementers (districts, sub counties, municipal councils, town councils and parish level leaders) and beneficiaries of the parish development model especially women, the interconnectedness of income poverty, human development poverty and social exclusion- and how these unequal power relations determine and result into extreme poverty and stuntedness are overly not considered in the model.

There is therefore an urgent need to engage duty bearers at parish/ward level and women on critical principles of human rights ie Participation, accountability, non-discrimination, transparency, human dignity, empowerment, and rule of law in the implementation of the Parish Development Model. This is key because a human rights-based approach helps frame entitlements and rights holders other than beggar recipients. The duty bearers (as implementers (districts, sub counties, municipal councils, town councils and parish level leaders) and women should be capacitated to understand the connection between a human rights-based approach and effective implementation.

Therefore, CEFROHT is now seeking proposals from suitable professionals to develop a training guide on a human rights based approach to PDM.

## **2. OBJECTIVES**

To develop technical training manual for a human rights based approach in the implementation of the PDM.

### **Develop technical training manual for a human rights based approach in the implementation of the PDM.**

The consultant is expected to work in consultation with the National Planning Authority and other major stake holders. It will be the guiding document in all trainings on the Human Rights Based Approach in the PDM. A joint technical team including; CEFROHT and NPA will work with the consultant to develop this manual. The manual will be validated and once approved will be designed, published and launched. The consultant is expected to be part of all these processes.

### **Applicants may submit a proposal for the assignment.**

The consultant will work with a joint technical team including; CEFROHT to develop this manual. The assignment will include; coming-up with clear objectives, identifying target audience, select appropriate training tools, develop training materials and provide tools for assessment and getting feedback. The consultant will be obliged to review and analyze the integration of a human rights based approach in the implementation of the PDM.

The detailed work will include:

- Desk review of human rights based approach to build on Participation, Accountability, Non-Discrimination and Equality, Transparency, Empowerment and Legality
- Build a body on the understanding of integration of a human rights based approach in the implementation of the PDM.
- Inbuild appropriate case studies for a human rights based approach in the implementation of

the PDM.

- Establish clear objectives for training manual
- Identify target audience
- Select appropriate training tools
- Develop training content based on desk reviews conducted
- Provide tools for assessment and getting feedback
- Provide first draft of the training manual
- Review of the first draft by CEFROHT and NPA for technical input
- Hold review meetings for technical input
- Finalize documentation of the manual

### **1. TARGET AUDIENCE**

The target audience comprise beneficiaries and duty bearers at parish, sub-county, district and national level

### **2. OTHER REQUIREMENTS & CONSIDERATION**

- Must have at least 10 years of experience in promoting human rights and use of the human rights based approach.
- Must show evidence of similar assignments done before
- Must have the capacity to engage duty bearers at all levels
- Must have relevant experience and qualifications to implement the proposed scope of work;
- Must have experience in working with duty bearers and organizations;
- Must be deadline-oriented, with high standards for quality.
- Must be able to coordinate/collaborate with beneficiaries of the project.

### 3. TENTATIVE TIMELINE

Activities	Timing
Start of contract	From contract signing date
Inception meeting with CEFROHT consultancy assignment planning and expectations and review of implementation plan	1 day
Conduct desk reviews	5 days
Develop training content & produce first draft	2 weeks
Review of the first draft by CEFROHT and NPA for technical input	5days
Finalize documentation of the manual	1 week
Presentation of Training manual	1 day
TOTAL	3 weeks 12 days

### 4. SELECTION CRITERIA AND SCORING

Proposals will be evaluated according to the Proposal Evaluation Criteria (in Appendix D) by the Reviewand Selection Committee. Only short-listed candidates will be contacted. Proposals with accompanying documentation will not be returned to unsuccessful candidates. Besides, unselected proposals, should not and will not be used in any form under any circumstance without prior written permission by corresponding candidates.

The proposals will be evaluated based on the Final Score which is the accumulated score of the scorefor proposals (primary score) and the score for presentation (interview score).

The chosen agency will be required to abide with code of conduct in regard to respect of fundamental social and human rights, and the equal rights of men and women while taking responsibility for minimizing the environmental impact in activities undertaken and, endorse ethical business practices

**Appendix (B)**  
**Budget**  
**(in Uganda Shillings)**

Cost Component	Amount (UGX)
1. Estimated Total (Gross)	
Grand TOTAL	



## **Appendix (C) Proposal Format**

The Offeror shall submit its best price offer/proposal in accordance with the Statement of Work (SOW) and shall contain the following:

1. **Proposal Cover Letter** signed by a person authorized to sign on behalf of the Offeror;
2. **Technical Approach/Proposal** for completing the deliverables in the SOW;
3. **Summary of Relevant Experience.** Offerors should list current and previous relevant projects;
4. **Performance References for similar work;**
5. **Budget.** Offerors must use the budget template in Attachment B
6. **Budget narrative.** Offerors must explain the rationale behind the numbers.

### **Technical and Financial Proposal Requirements:**

It is requested that Offerors organize their Technical and Financial Proposals as noted below. This request is prerequisite for the Project to review the submitted material thus enabling a rapid decision and contracting process.

#### **Technical Proposal Requirements:**

The technical proposal must be written in English. There should be a maximum of 5 type-written pages, excluding appendixes/supporting documents, with no more than 1 page covering Company Information and Relevant Past Performance. (Format - Type: Times New Roman, Font Size 11, Margins: 1" all around)

The technical proposal shall address the subjects outlined below:

#### **A. Firm Information(in case applying as a firm and in case you are applying as an individual adjust accordingly)**

- Provide the name, address and license of your firm.
- Provide the contact information for your primary contact for this project.
- If you are partnering with other firms or institutions, provide the above information for each partner and the percentage of the work that they will be performing.
- Please describe your firm's management structure if applicable.
- Identify the Key Personnel that would be working on this project assuming an award. Please include a brief statement about the capabilities and experience. CVs must be provided, not exceeding 2 pages.

#### **B. Past Performance**

Please outline your experience or experience your firm has had in performing work

similar to that described in Appendix A. **For each former and/or current project, please include the name of the client and his or her contact information (current and most recent information required, within the last year).** It is CEFROHT's

intention to contact some of these clients for testimonials regarding your performance or firm's performance in these areas:

- The quality of the work performed by the Offeror,
- The capability performed by the Offeror,
- The timeliness of the effort of the Offeror, and
- Whether the Client would use Offeror's services should they have similar needs in the future?

### **C. Technical Approach**

Please submit a detailed technical write-up of the proposed implementation strategy and management for this specific assignment. **Offerors must include a Gantt Chart Schedule.**

### **Financial Proposal Requirements**

The Offeror's proposed Financial proposal must represent the linkages between budget items and activities proposed in the proposal.

It should be noted that a narrative describing the basis on which the costs were derived as well as an explanation for whom, why, where, when, etc. and supporting information must be provided in sufficient detail to allow a complete analysis of the Offeror's cost/price.

The Offeror must use the budget template in Attachment B.

**Appendix (D)**  
**Proposal Evaluation**  
**Criteria**

<b>Part 1</b> <i>Dossier</i>							
No	Description of criteria	Guidance notes	Tick as appropriate				
			Signed & Stamped Proposal Cover Letter	Technical Proposal	Summary of Relevant Experience	Performance References	Financial Proposal
			Yes	No	Comments		
Overall Comments (if any)							
Evaluation (Pass <sup>1</sup> /Fail <sup>2</sup> )							
<b>Part 2</b>					<i>Experience &amp; Performance (TOTAL possible point: 20 points)</i>		
No	Description of criteria				Max. possible score		
<b>1</b>	<b>Relevant experience</b>				<b>10</b>		
<b>2</b>	<b>Personnel capabilities</b>				<b>10</b>		
<b>Part 3</b>					<i>Technical Proposal (TOTAL: 60 points)</i>		
No	Description of criteria				Max. possible score		
<b>1</b>	<b>The clarity and logic of the protocol</b>				<b>10</b>		
<b>2</b>	<b>The necessity of proposed activities</b>				<b>5</b>		
<b>3</b>	<b>Methodologies</b>				<b>20</b>		
<b>4</b>	<b>Feasibility of protocol activities</b>				<b>10</b>		
<b>5</b>	<b>Creativity of the protocol</b>				<b>10</b>		
<b>6</b>	<b>Monitoring, Evaluation &amp; Risk management</b>				<b>5</b>		
<b>Part 4</b>					<i>Cost Evaluation Criteria (TOTAL: 20 points)</i>		
No	Description of criteria				Max. possible score		
<b>1</b>	<b>Relevance, reasonableness and logics of the budget</b>				<b>10</b>		

<b>2</b>	<b>Efficiency of the budget</b>	<b>10</b>
	<b>TOTAL</b>	<b>100/100</b>

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1 If Pass, come to Part 2.

2 If Fail, stop evaluation.

## **Appendix E – CEFROHT Supplier Code of Conduct**

CEFROHT recognizes the universal and fundamental values enshrined in international instruments in the areas of human rights, labor, environment and anti-corruption.

CEFROHT expects its Suppliers to respect fundamental social and human rights, and the equal rights of men and women, take responsibility for minimizing the environmental impact of their activities, endorse ethical business practices and reach the following goals:

**1. Supplier Relationships:** The provisions of this Code of Conduct set forth the expectations of all suppliers with whom CEFROHT does business. CEFROHT expects that these principles apply to suppliers, parent entities and subsidiary or affiliate entities, as well as all others with whom they do business including employees, subcontractors and other third-parties. CEFROHT expects suppliers to ensure that the rules and standards of this Code of Conduct are communicated to their employees and subcontractors.

**2. Promoting the Principles of this Code of Conduct:** CEFROHT expects that its suppliers will establish and maintain appropriate management systems whose scope is related to the content of this Code of Conduct, and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. All principles contained in this Code of Conduct are of equal importance independently of their order of appearance.

**3. Subcontracting:** CEFROHT expects that its suppliers encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code of Conduct or equivalent set of principles.

### **Labor:**

**4. Freedom of Association and Collective Bargaining:** CEFROHT expects its suppliers to recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with the laws of the countries in which they are employed, as well as core international principles on Freedom of Association and collective bargaining. CEFROHT recognizes the importance of open communication and direct engagement between workers and management and suppliers are to respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference or reprisal.

**5. Forced Labor:** CEFROHT expects its suppliers to prohibit any use of forced, bonded or indentured labor or involuntary prison labor, and embrace employment practices consistent with international rules on forced labor. All work, including overtime work, will be voluntary and workers should be free to leave upon reasonable notice. Suppliers should also not mandate that workers hand over government-issued identification, passports or work permits as a condition of employment.

**6. Child Labor:** CEFROHT expects its suppliers, at a minimum, not to engage in any practice inconsistent with the rights set forth in the Convention on the Rights of the Child. The minimum admission to employment or work shall not be less than the age of completion of compulsory schooling, normally not less than 15 years or 14

where the local law of the country permits, deferring to the greatest age. Additionally, all young workers must be protected from performing any work that is likely to be hazardous or to interfere with the child's education or that may be harmful to the child's health, physical, mental, social, spiritual or moral development. All suppliers should also adhere to legitimate workplace apprenticeship programs and comply with all laws and regulations governing child labor and apprenticeship programs.

**7. Discrimination:** CEFROHT does not tolerate any form of discrimination in hiring and employment practices on the ground or race, color, religion, gender, sexual orientation, age, physical ability, health condition, political opinion, nationality, social or ethnic origin, union membership or marital status. CEFROHT also discourages discrimination regarding access to training, promotion, and rewards.

**8. Working Hours:** CEFROHT expects its suppliers to comply with all applicable working hour requirements as established by local law, and should never exceed 60 hours per week, including overtime, except in emergency or unusual situations. Suppliers must ensure that all overtime work is voluntary and compensated at the prevailing overtime rates. Suppliers are encouraged to ensure that workers are provided with one day off in every seven-day week.

**9. Compensation:** CEFROHT expects its suppliers to comply, at a minimum, with all wage and hour laws and regulations, including those pertaining to minimum wages, overtime wages, piece rates, other elements of compensation and to provide legally mandated benefits.

#### **Human Rights:**

**10. Human Rights:** CEFROHT expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

**11. Harassment, Harsh or Inhumane Treatment:** CEFROHT expects its suppliers to create and maintain an environment that treats all employees with dignity and respect and will not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. No harsh or inhumane treatment coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

**12. Health and Safety:** CEFROHT expects its suppliers to follow all relevant legislation, regulations and directives in the country in which they operate to ensure a safe and healthy workplace or any other location where production or work is undertaken. At a minimum, suppliers should strive to implement recognized management systems; reasonable access to potable water and sanitary facilities; fire safety; emergency preparedness and response; industrial hygiene; adequate lighting and ventilation; and occupational injury and illness and machine safeguarding. Suppliers will also ensure these same standards apply to any dormitory or canteen facilities.

**13. Mines:** CEFROHT expects its suppliers to strive not to engage in the sale or manufacture of anti-personnel mines or components utilized in the manufacture of anti-personnel mines.

**Environment:**

**14. Environmental:** CEFROHT expects its suppliers to comply with existing legislation and regulations regarding the protection of the environment. Suppliers should wherever possible support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices.

**15. Chemical and Hazardous Materials:** Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

**16. Wastewater and Solid Waste:** Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

**17. Air Emissions:** Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, monitored, controlled and treated as required prior to discharge.

**18. Minimize Waste, Maximize Recycling:** Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

**Drug trafficking and Terrorism:**

**19. Drug Trafficking:** CEFROHT expects its suppliers to warrant that neither they, nor any of their employees and subcontractors, are engaged in the manufacture, sale, transportation, or distribution of any drug or narcotic substance deemed to be illegal in either the country of manufacture or delivery of the goods or services to be provided to CEFROHT.

**20. Terrorism:** CEFROHT expects its suppliers to warrant that neither they, nor any of their employees and subcontractors, are engaged directly or indirectly in terrorism, or in the finance or support to terrorists. Further, CEFROHT expects its suppliers to warrant that neither they nor their staff, nor any other recipients of funds from the supply of goods or services to CEFROHT, are listed in any sanctions list maintained by the United Nations Security Council; the United States Department of the Treasury, Office of Foreign Assets Control; or the European Union. Should the supplier, its staff, or other recipients of funds from the supply of goods or services to CEFROHT be included in any of the above-listed sanctions lists, the supplier is expected to notify CEFROHT immediately.

**Bribery & Corruption:**

**21. Corruption:** CEFROHT expects its suppliers to adhere to the highest standard of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including extortion, fraud, or bribery, at a minimum.

**22. Conflict of Interest:** CEFROHT suppliers are expected to disclose to CEFROHT any situation that may appear as a conflict of interest, and disclose to CEFROHT if any CEFROHT official or professional under contract with CEFROHT may have an interest of any kind in the supplier's business or any kind of economic



ties with the supplier.

**23. Gifts and Hospitality:** CEFROHT does not accept any type of gift or any offer of hospitality. CEFROHT will not accept any invitations to sporting or cultural events, offers of holidays or other recreational trips, transportation, or invitations to lunches or dinners. CEFROHT expects its suppliers not to offer any benefit such as free goods or services or a work position or sales opportunity to CEFROHT personnel in order to facilitate the supplier's business with CEFROHT.

**24. Monitoring and Evaluation:** CEFROHT may conduct on-site evaluations and inspections of its suppliers' facilities and those of their subcontractors to review their progress towards these principles. It is the expectation of CEFROHT that suppliers, at a minimum, have established clear goals toward meeting the standards set forth in this Code of Conduct. CEFROHT may monitor that milestones have been set and management systems have been put in place to ensure that the principles set out in this Code of Conduct have been met and failure to do so may impact the future ability of a supplier to do business with CEFROHT.