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Current Policies are at [www.zeabrokers.com](http://www.zeabrokers.com)

Version 1.32

## Combating Trafficking in Persons Compliance Plan

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## 1. Purpose Statement

ZEA LLC is committed to upholding the highest ethical standards by strictly adhering to both **FAR 52.222-50 (Combating Trafficking in Persons)** and **FAR 52.222-56 (Certification Regarding Trafficking in Persons Compliance Plan)**. This policy establishes the company's commitment to preventing trafficking in persons, forced labor, and related practices in all operations, in compliance with **Solicitation No. 19GE5025R0007**.

## Scope of the policy, Applicability

This CTIP policy applies to:

- **All employees** of ZEA LLC.
- **Subcontractors, suppliers, and agents** involved in federal contracts.
- **Partners and vendors** engaged in recruitment, labor management, and service provision.
- **All supplies**, other than commercially available off the shelf items to be acquired outside the United States, or services to be performed outside the United States
- **All undertakings** which exceed a value of over \$550,000

## 3. Prohibited Activities

ZEA LLC strictly **prohibits**:

- Engaging in severe forms of trafficking in persons.
- Using forced labor in the performance of any contract.
- Charging employees recruitment fees.
- Destroying, concealing, or confiscating an employee's identity or immigration documents.
- Providing misleading information about work conditions or wages.
- Using coercion, threats, or fraudulent practices in hiring and employment.
- Failing to provide return transportation for employees recruited for overseas contracts as required under FAR 52.222-50.

## Housing Plan

For contracts requiring employer-provided housing, ZEA LLC ensures:

- Housing will comply with **local safety and health standards**, providing clean and safe living conditions.
- Regular **inspections and audits** will be conducted to ensure compliance.
- Employees will have access to **basic amenities** such as clean water, electricity, and sanitation facilities.
- Employees will not be charged **exorbitant fees** for housing, and any housing costs will be clearly outlined in employment agreements.

## 4. Certification Requirements

Under **FAR 52.222-56**, ZEA LLC certifies:

- A compliance plan has been implemented to monitor, detect, and prevent prohibited activities as identified in **FAR 52.222-50(b)**.
- Due diligence has been conducted, and:
  - o To the best of the company's knowledge, neither it nor its subcontractors, suppliers, or agents are engaged in prohibited activities; or
  - o If abuses were identified, appropriate remedial and referral actions have been taken.

## 5. Subcontractor and Supplier Compliance

All subcontractors and suppliers engaged by ZEA LLC must:

- Certify their compliance with **FAR 52.222-50** and **FAR 52.222-56**.
- Implement their own anti-trafficking programs or adopt ZEA LLC' CTIP policy.
- Flow down these requirements to their subcontractors and vendors.
- Maintain records demonstrating compliance and provide them upon request.

## 6. Training Requirements

All employees and relevant personnel will:

- Complete **mandatory CTIP training** during onboarding and **annual refresher courses** thereafter. As described on [www.silverphoenixprocurement.com](http://www.silverphoenixprocurement.com)
- Training will cover:
  - o Understanding **trafficking indicators**.
  - o Reporting obligations and mechanisms.
  - o Responsibilities under **FAR 52.222-50** and **FAR 52.222-56**.
  - o Training records must be maintained for **at least three years**.

## 7. Reporting Mechanisms

ZEA LLC provides multiple channels for reporting suspected violations:

- **Internal Reporting:** Employees and contractors may report concerns directly to the **Compliance Officer at [director@silverphoenix.com](mailto:director@silverphoenix.com)** or via the **hotline +33744809567**.
- **External Reporting:** Reports may also be submitted to the **Global Human Trafficking Hotline at 1-844-888-FREE (3733)** or to the appropriate **Contracting Officer**.
- **Whistleblower Protections:** Retaliation against employees or subcontractors who report concerns in good faith is strictly prohibited

## 8. Monitoring, Audits, and Compliance Reviews

ZEA LLC will:

- Conduct **annual compliance audits** to ensure adherence to CTIP regulations.
- Require subcontractors and suppliers to submit **compliance certifications** (directly through [www.silverphoenixprocurement.com](http://www.silverphoenixprocurement.com)).
- Investigate all reported violations and take immediate corrective action, including contract termination if necessary.
- Maintain all compliance documentation for **at least three years**.

## 9. Consequences of Non-Compliance

Violations of this policy will result in:

- **Termination of employment or contracts.**
- **Legal and financial penalties.**
- **Notification to federal authorities** and potential suspension or debarment from future contracts.

## 10. Policy Review and Updates

This policy will be reviewed at minimum **annually** and updated as necessary to reflect changes in laws, regulations, and best practices.

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## 11. Company Details

- **Company Size:** ZEA LLC has two employees.
- **Nature of Operations:** ZEA LLC provides insurance services as a managing agent, working exclusively through subcontractors.

- **Location:** The company is U.S.-based but operates internationally.
- **Risk Level:** There are no high-risk sectors in the company's operations or supply chain.
- **Compliance Officer:** The Compliance Officer is **Arnaud Saacke**, responsible for overseeing CTIP implementation and reporting.

This finalized CTIP plan ensures compliance with **Solicitation No. 19GE5025R0007, FAR 52.222-50, and FAR 52.222-56**, reinforcing ZEA LLC' commitment to ethical business practices and human rights protection.

**Authorized Representative:**

*Carson Hall*

*Chief Executive Officer*

*ZEA LLC*

*Date: 02.12.2025*

A handwritten signature in black ink, appearing to be 'Carson Hall', with a large '2' and a checkmark-like flourish below it.