Date: 20 August, 2021

**Authorized by:**

**Jaime Nadal**

**UNFPA Representative**

**REQUEST FOR QUOTATION**

**RFQ Nº UNFPA/UKR/RFQ/21/22**

Dear Sir/Madam,

UNFPA hereby solicits a quotation for the following service:

**Conducting gender assessment at JSC “Ukrzaliznytsia”**

This Request for Quotation is open to all legally-constituted companies in Ukraine that can provide the requested services and have legal capacity to perform in Ukraine, or through an authorized representative.

The procurement is part of the project “Equality Springboard: Project on Social Norms Change and Gender Stereotypes Elimination for Better Resilience and Prosperity of Women and Men in Ukraine” funded by Sweden.

**Terms of Reference (ToR)**

**INTRODUCTION**

UNFPA, the United Nations Population Fund, is the lead UN agency focusing on gender equality, reproductive health and youth empowerment. Together with UNFPA partners, it works in 150 countries and territories around the world. The UNFPA Ukraine has been operating since 1997. Guided by the Programme of Action (ICPD), we work to deliver a world where every pregnancy is wanted, every childbirth is safe and every young person’s potential is fulfilled.

UNFPA Ukraine works to build a society free of gender stereotypes and violence. We work with international, national, as well as business partners.

In 2019, UNFPA presented the findings of the study “Gender Equality and Response to Domestic Violence in the Private Sector of Ukraine: A Call to Action” according to which:

· less than half (45%) of respondents agreed that management treats women and men equally when granting childcare leave due to child’s sickness;

· only a third of respondents acknowledged that women and men could equally use parental leave for children under 3 years of age;

· only 5% of male office workers took parental leave to care for a child under 3 years of age;

· almost a quarter of women and men surveyed (24%) in domestic companies experienced domestic violence; the vast majority of them are women (81%);

At the same time, UNFPA initiated the establishment of Ukraine’s first Business Coalition, which is stepping up its efforts to achieve gender equality and prevent domestic violence.

The main objective of the Coalition is to:

1. Introduce gender-sensitive approaches in the work of companies, create conditions for decent work and equal employment and implement family-friendly policies;
2. Promote the prevention of domestic violence and formation of zero tolerance for all its manifestations;
3. Develop and promote cooperation for women’s empowerment, gender equality and formation of zero tolerance for domestic violence.

UNFPA and its partners prepared a handbook, which briefly and in detail describes the current status of Ukrainian legislation and international standards for family-friendly policies, as well as tells how businesses can become responsible and competitive in today’s market. This is the Ukrainian 4c model: acknowledge — respond — establish effective partnerships — measure. Detailed information on the methodology is available at the [link](https://ukraine.unfpa.org/sites/default/files/pub-pdf/Gender_brochure_200x200_16_01_19_0.pdf).

**CONTEXT**

A strong economy, where everyone has a decent job and there is no discrimination, which in turn affects the level of well-being, are important factors in the development and prosperity of every state. By joining the Sustainable Development Goals (SDGs) Agenda 2030 Ukraine committed, in particular, to promoting gender equality, including combating domestic violence, and ensuring decent work for all (Goals 5 and 8).

Strong economies tend to have influential internal business communities whose members support each other and share experiences of implementing best global practices and policies, thus maintaining their productivity and competitiveness. Therefore, Ukrainian businesses are also actively joining efforts to support national priorities and global goals.

In today’s world, human capital is a competitive advantage. Employers are constantly looking for the best, spending time and resources to develop and retain staff. However, people can easily be lost, for example, due to discrimination or non-observance of rights.

Employers are the undisputed leaders of trust for people — 75% of employees trust their companies in improving living standards both in the country and at the community level. Therefore, companies should in turn guarantee the protection of human rights, including gender equality, and prevent domestic violence, form an appropriate corporate culture of support and assistance, work-life balance, for example, by granting childcare leave to fathers. The implementation of appropriate policies creates many opportunities for businesses, including a positive reputation of the company, improving competitiveness, and improving the work with partners and customers.

Work-life balance is an important component of non-discrimination and equal rights and opportunities for women and men. The Ukrainian legislation stipulates that the employer is obliged to provide women and men with the opportunity to combine work with family responsibilities (Article 17 of the Law of Ukraine on Ensuring Equal Rights and Opportunities for Women and Men).

During the COVID-19 pandemic, the problem of maintaining a work-life balance became acute. The closing of kindergartens and schools turning to distance learning, the caring for sick family members required more and more employees’ time, which in turn requires appropriate employers’ policies.

The JSC “Ukrzaliznytsia” is the largest employer in Ukraine, which seeks to raise social standards for employees, eradicate discrimination at all levels of the organizational structure, develop family-friendly policies, and develop zero tolerance for violence within the company. In 2021, JSC “Ukrzaliznytsia” conducted a corporate study on discrimination in the workplace, which emphasizes the relevance of gender assessment of policies and other corporate documents and the development of systemic mechanisms to combat discrimination and gender-based violence (GBV).

**PURPOSE**

The purpose of the project is to conduct a gender assessment and analysis of corporate policies and other HR documents for family friendliness and focus on combating gender-based violence at JSC “Ukrzaliznytsia”.

UNFPA expects the assessment to:

* study corporate policies and other key documents of JSC “Ukrzaliznytsia” relating to personnel management to explore the aspects of non-discrimination, work-life balance and combating GBV;
* assess the practice of non-discrimination in employment, social and financial support programs for employees with families, ensuring a flexible work schedule, granting maternity leave for parents, staff motivation, etc.;
* systematize and analyze the obtained data and develop recommendations on implementation of necessary changes in policies and other relevant documents of the company, conducting trainings for personnel, introduction of internal corporate mechanisms of promotion of principles of gender equality and response to cases of violence, etc.;
* prepare extended and abbreviated analytical reports;
* inform the company’s management about the findings, ensure participation in the presentation of findings.

**METHODOLOGY**

The selected pool (group) of experts or a research company is expected to develop an assessment methodology framework with methods and instruments to be discussed and agreed upon by UNFPA and the responsible persons of JSC “Ukrzaliznytsia”. The methodology should be based on ILO recommendations for participatory gender auditing, take into account other international standards for gender auditing and ensure that the information collected is representative, valid, reliable and sufficient to meet the assessment objectives and that the analysis is logically coherent and complete (and not speculative or opinion-based). The methodology will cover a mixture of:

* Desk review of best practices of implementation of non-discrimination, work-life balance and GBV combating policies in the corporate sector (Ukrainian and international examples, in particular among railway companies);
* Desk review of existing corporate documents and practices of non-discrimination, work-life balance and GBV combating at JSC “Ukrzaliznytsia”;
* Preparation of guides for interviews and the team of facilitators;
* Structured and semi-structured interviews with top managers and the company’s board, line managers of key departments on awareness of existing practices of gender equality, non-discrimination, combating GBV and work-life balance policies, as well as on existing barriers and desired changes;
* Focus groups with employees of the central office and regional branches of the company, with HR personnel;
* Data collection, analysis and visualization; delivery of video recordings and transcripts of interviews in Ukrainian;
* Preparation of recommendations on the development of internal policies of JSC “Ukrzaliznytsia” on non-discrimination, gender equality, work-life balance and combating GBV based on best practices in railway transport sector;
* Preparation of interim and final reports.

Upon agreement with UNFPA and programme stakeholders, the assessment framework will be translated into an assessment calendar work plan. UNFPA commits to provide the evaluators with all available UNFPA and implementing partner documents that may be relevant for the assessment

Upon agreement with UNFPA and responsible persons of JSC “Ukrzaliznytsia”, the structure (stages) of the assessment will be specified in the work schedule. UNFPA undertakes to provide experts with all documents available to UNFPA and its implementing partners that may be useful for the evaluation.

**ETHICS**

All Evaluation Team members should respect and comply with the ethical principles for assessment and confidentiality:

* **Intentionality:** bearing in mind the purpose, usefulness and necessity of the assessment at all its stages.
* **Avoiding conflict of interest:** upholding the principles of independence, impartiality, credibility, honesty, integrity and accountability. The vendor should not have or had in the past any formal relations with the audited company which implied access to the internal corporate information.
* **Interactions with participants**: engaging appropriately and respectfully with participants in all assessment processes, upholding the principles of confidentiality and anonymity and their limitations, dignity and diversity, human rights, gender equality, avoidance of harm, especially with regard to sensitivities connected with GBV and domestic violence.
* **Assessment processes and products**: ensuring accuracy, representativeness, completeness and reliability, inclusion and non-discrimination, transparency, fair and balanced reporting that acknowledges different perspectives.
* **Discovery of wrongdoing**: discreetly reporting the discovery of any apparent misconduct to UNFPA.

**SCOPE OF WORK, DELIVERABLES AND REPORTING**

The overall guidance of the assessment will be done by the UNFPA Assistant Representative, UNFPA Gender Program Manager, UNFPA Partnership and Mobilization Analyst, UNFPA Equality Springboard Project Manager and responsible persons of JSC “Ukrzaliznytsia”.

Experts should provide information, produce and submit the assessment reports, presentation of findings and recommendations as explained below in this section. These documents (reports) should be submitted to UNFPA in electronic format in **Ukrainian** before the deadlines agreed with UNFPA.

**The presentation made upon findings and recommendations outlined in the final report should be submitted in both Ukrainian and English**. Text documents should be prepared in Microsoft Word on A4 size pages will all page margins of 2 cm using the Calibri or Times New Roman font of size 11 with single line spacing and paragraphs separated with a blank line. Layout design of the deliverables is not required but most welcome.

Work schedule:

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| --- | --- | --- | --- |
| # | Deliverables | Description | Tentative deadline  |
|  | Development of a gender assessment project  | The project should include methodology, data sources, information collection methods, general evaluation plan with work schedule, meeting/interview plan and a list of key sources of information, deadlines for submission of final materials and proposals on the structure/contents of the evaluation report | 2 weeks since the signing of Contract  |
|  | Desk review of best practices of implementation of policies and other corporate documents on non-discrimination, work-life balance and GBV combating policies in the corporate sector (international examples) | A desk review of best practices of Ukrainian and foreign public and private sector companies (in particular, leading railway companies) on ensuring non-discrimination, gender equality, the introduction of family-friendly approaches and combating GBV developedUp to 10 pages | Up to 4 weeks since the approval of the project |
|  | Desk review of practices of JSC “Ukrzaliznytsia” | A desk review of existing corporate practices of non-discrimination on the grounds of gender, collection of gender statistics, work-life balance and GBV combating policies at JSC “Ukrzaliznytsia” developedUp to 15 pages | Up to 4 weeks since the approval of the project |
|  | Development and approval of guides for interviews with top management and the board, training of facilitators | The UNFPA team and responsible persons of JSC “Ukrzaliznytsia” review the guide and ToR for facilitators, provide comments and return it to evaluators  | 10 business days for approval |
|  | Development and approval of guides for focus groups for staff of the central office, regional branches and HR personnel | The UNFPA team and responsible persons of JSC “Ukrzaliznytsia” review the guide for FGDs, provide comments and return it to evaluators | 10 business days for approval |
|  | Interviews with top management and line managers | Interviews (online and offline) with up to 10 people. Delivery of video or audio recordings and transcripts in Ukrainian  | within 2 weeks |
|  | Conducting focus groups for staff of the central office, regional branches and HR personnel  | At least 3 focus groups (online and offline) of 8 participants from the central office and regional branches (interviews can be conducted at the Contractor’s premises) Delivery of video or audio recordings and transcripts in Ukrainian (for offline meetings) | within 2 weeks |
|  | Delivery of an inception report on the results of interviews and FGDs with conclusions (topline memo)  | Inception report with general conclusions - up to 5 pagesDiscussion with responsible persons of UNFPA and JSC “Ukrzaliznytsia” | -2 weeks for inception report |
|  | Feedback on the first draft evaluation report  | UNFPA provides a summary feedback on the report | 1 week |
|  | Preparation of extended and abbreviated versions of the final report with recommendations  | The report should contain an explanatory note (summary of the purpose and objectives of the evaluation), methodology and key findings, diagrams of key data, conclusions and recommendations in Ukrainian and English  | 2 weeks after the approval of inception report |
|  | Finalization of the evaluation report  | The final “clean version” of the report with all annexes (**in Ukrainian**) and presentation (**in Ukrainian and English**) delivered  | 1 week |
|  | Presentation of evaluation findings  | The findings and recommendations presented publicly with the participation of UNFPA and the Embassy of Sweden |  |

The **assessment report** is expected not to exceed **40** pages excluding annexes and should follow the structure agreed by UNFPA in the inception phase report, unless otherwise agreed in writing. Preferably, the executive summary should be written in short sentences, in a clear and simple language. The report must only contain information relevant for the assessment purpose and avoid including information of no direct relevance to the analysis. Assessment readers should be able to easily understand:

* What was assessed and why (purpose and scope);
* How the assessment was designed and conducted, how the representativeness of findings was ensured (assessment questions, methodology and limitations);
* What was found and on what evidence base (findings and evidences);
* What was concluded from the findings in relation to main assessment questions asked, and how such conclusions were drawn (good practices and conclusions);
* What and why was recommended (recommendations);
* What could be learned from the assessment (lessons learned).

Special attention in the report should be paid to recommendations. They should be strictly based on evidence collected during the assessment and analysis made, follow exclusively from the assessment findings and conclusions and not be based merely on opinions. Recommendations could include strategic directions and operational solutions adapted to the specifics of the activities and documents of JSC “Ukrzaliznytsia”. They should be practical and actionable, and very clear about who should take the proposed action, albeit not too prescriptive. Therefore, draft recommendations should be discussed in detail with potential implementers to secure their acceptability and feasibility and foster understanding, ownership and commitment of those who will act.

All costs of the assessment will be covered by a company performing the assignment under this tender. The evaluators are supposed to use their own equipment and tools for this assignment (computers, printers, photocopiers, cameras, voice/video recorders, data analysis apps etc.) and make their own travel arrangements for travels. UNFPA is not in a position to provide visa support or facilitate receiving work permits for evaluators.

Evaluation contract payments will be made by UNFPA via bank transfers through the United Nations Office in Ukraine based on review and approval of the deliverables by the Head of UNFPA, UNFPA Gender Program Manager, UNFPA Partnership and Mobilization Analyst, UNFPA Equality Springboard Project Manager and responsible persons of JSC “Ukrzaliznytsia”.

The contract amount will be paid in three installments as follows:

1. 30% upon submission of the project and assessment methodology and desk reviews of international practices and policies of JSC “Ukrzaliznytsia”;
2. 30% upon approval of the first evaluation report
3. 40% upon acceptance of the finalized Evaluation Report, presentation and recommendation.

**Questions**

Questions or requests for further clarifications should be submitted in writing to the contact e-mail below:

|  |  |
| --- | --- |
| Email address of contact person: | *zinkevych@unfpa.org* |

The deadline for submission of questions **Tuesday, September 7, 2021, 17:00 Kyiv time.**

**SUBMISSIONS AND SELECTION**

In response to the UNFPA request for quotations, interested companies or groups of consultants should prepare and submit their Quotations in a single e-mail whenever possible, depending on file size. Quotations must contain a) technical and b) financial proposals.

**Technical proposals** should meet all the requirements of these terms of reference ensuring that the purpose, questions, scope, criteria, deliverables, management and financial arrangements of the evaluation are considered. A technical proposal should demonstrate the understanding of the assignment by the evaluators and explain the proposed approach to organizing and managing the works, evaluation methodology, data sources, data collection methods and tools, data analysis procedures and criteria for making judgments, as well as the proposed structure/contents of the evaluation report and how it will be composed. The technical proposal should also provide a work plan and timeline, composition of the Evaluation Team with updated CVs of all members, and links or soft copies of two most recent evaluations performed by the proposed team. The technical proposal must be clearly marked “TECHNICAL PROPOSAL” and should NOT contain any financial information, otherwise they will not be qualified for consideration.

Price quotation with proposed budgets should be submitted strictly in accordance with the price quotation form, including:

● Daily rates for each evaluator of the team

● Proposed number of days for each evaluator on this assignment and specification of work to be performed

● Operational support costs (e.g. communications, interpretation/translation, expendables, stationery, transportation, subsistence in case the travel is foreseen by the proposal).

● Any other costs that need to be covered to make the evaluation exercise a success, with detailed justifications

Travel expenses should be based on the most direct and economical fares and should not exceed the applicable rates established by the United Nations for Ukraine. The financial proposal must be submitted to the secured e-mail indicated below together with the technical proposal and clearly marked “FINANCIAL PROPOSAL”.

**Instructions for submission**

Proposals should be prepared based on the guidelines set forth in ToR, along with a properly filled out and signed price quotation form, are to be sent by e-mail to the secured e-mail and contact person indicated below no later than **Monday, September 13, 2021 at 17:00 Kyiv time.** Proposals sent to any other address will not be considered.

|  |  |
| --- | --- |
| Name of contact person at UNFPA: | *Iryna Bohun* |
| Email address of contact person: | **ua-procurement@unfpa.org** |

Please note the following guidelines for electronic submissions:

- The following reference must be included in the email subject line: **RFQ Nº UNFPA/UKR/RFQ/21/22.** Proposals that do not contain the correct email subject line may be overlooked by the administrator and therefore not considered.

- The total e-mail size may not exceed **20 MB (including e-mail body, encoded attachments and headers)**. Where the technical details are in large electronic files, it is recommended that these be sent separately before the deadline.

An evaluation committee will be established by UNFPA to evaluate all received applications. Applications will be reviewed in a two-stage process: technical proposals will be evaluated and rated before opening of financial proposals. Only those proposals found technically compliant will be subject to comparative financial evaluation.

The applications will be evaluated with 60% weight assigned to technical proposal score and 40% to financial proposal score, and according to the following criteria and scores:

**Technical proposals (100 points max):**

Overall response (20 points max)

* General quality and completeness of the proposal vis-à-vis the terms of reference and request for quotations requirements
* Applicant’s understanding of the evaluation subject, purpose, objectives, scope, expected deliverables
* Applicant’s background, official registration, recommendations etc.

Proposed methodology and approach (50 points max)

* Proposed approach to organizing and managing the evaluation
* Proposed methodology, techniques, scope and tools of sampling and data collection, data analysis procedures and criteria for making judgments
* Proposed structure/contents of the evaluation report and how it will be composed
* Proposed work plan and timeline
* Deliverables are addressed as per TOR; proposed timelines are met

Technical capacity of the Evaluation Team (30 points max)

* Range and depth of experience with similar evaluations
* Academic qualifications and job record
* Competencies and skills relevant for the evaluation (e.g. communications, analysis, data management, report writing, software use)
* Ukrainian and English language proficiency

**Only those technical proposals achieving the score of 60 points and above will be considered as qualifying for evaluation of the financial proposal.**

**Financial Proposals (100 points max):**

Financial proposals should follow the results-based budgeting approach. They will be assessed based on their clarity, completeness, level of detail and appropriateness. The maximum number of points shall be scored to the lowest price proposal among all technically qualifying applications. Other financial proposals will receive scores in inverse proportion according to the following formula:

|  |  |  |
| --- | --- | --- |
| Financial score = | Lowest price ($) | X 100 (Maximum score) |
| Price being scored ($) |

The total score of each application will represent the weighted sum of its technical and financial scores:



**REQUIREMENTS**

The service provider should be a pool (group) of experts with a desirable involvement of an international consultant, with a solid monitoring and evaluation background and respective practical experience. One of the team members will be assigned with the Team Leader responsibilities. The team should have the following qualifications and skills mix:

* Academic background or special training in monitoring and evaluation, preferably in the international corporate context
* Training on or practical involvement in gender equality in corporate sector and GBV prevention interventions
* Excellent knowledge of evaluation principles, norms, standards, methodologies, designs, ethics and practices
* Technical evaluation skills
* Evaluation management skills
* Proven experience of conducting programme or project evaluations, ideally in gender equality or GBV response.
* Data management and analytical skills
* Communication and interpersonal skills
* Time management skills, ability to respect set deadlines
* Excellent writing skills
* Perfect knowledge of written and spoken Ukrainian and English
* **Award Criteria**

A contract for a period until 31 March 2022 between UNFPA and the Supplier will be concluded with the bidder whose bid will receive the highest overall score.

* **Right to Vary Requirements at Time of Award**

UNFPA reserves the right at the time of award of contract to increase or decrease by up to 20% the volume of services specified in this RFQ without any change in unit prices or other terms and conditions.

* **Payment Terms**

The payment will be done in accordance with the above deliverables acceptance by the Contractor and complete set of supporting documentation.

The payment will be done in currency: Ukrainian Hryvnias. In case of two currencies involved, the United Nations Operational Rate of Exchange should be used on the day UNFPA instructs that payment(s) (web: [www.treasury.un.org](http://www.treasury.un.org/)).

The payment terms are 30 days after receipt of the related documents, invoices and other documentation required according to the contract.

* **Fraud and Corruption**

UNFPA is committed to preventing, identifying, and addressing all acts of fraud against UNFPA, as well as against third parties involved in UNFPA activities. UNFPA’s policy regarding fraud and corruption is available here: [FraudPolicy](http://www.unfpa.org/resources/fraud-policy-2009). Submission of a proposal implies that the Bidder is aware of this policy.

Suppliers, their subsidiaries, agents, intermediaries and principals must cooperate with the UNFPA Office of Audit and Investigations Services as well as with any other oversight entity authorized by the Executive Director and with the UNFPA Ethics Advisor as and when required. Such cooperation shall include, but not be limited to, the following: access to all employees, representatives, agents and assignees of the vendor; as well as production of all documents requested, including financial records. Failure to fully cooperate with investigations will be considered sufficient grounds to allow UNFPA to repudiate and terminate the Agreement, and to debar and remove the supplier from UNFPA’s list of registered suppliers.

A confidential Anti-Fraud Hotline is available to any Bidder to report suspicious fraudulent activities at [UNFPAInvestigationHotline](http://web2.unfpa.org/help/hotline.cfm).

* **Zero Tolerance**

UNFPA has adopted a zero-tolerance policy on gifts and hospitality. Suppliers are therefore requested not to send gifts or offer hospitality to UNFPA personnel. Further details on this policy are available here: [ZeroTolerancePolicy](http://www.unfpa.org/about-procurement).

* **RFQ Protest**
* Bidder(s) perceiving that they have been unjustly or unfairly treated in connection with a solicitation, evaluation, or award of a contract may submit a complaint to the UNFPA Programme Manager Olesia Kompaniiets at e-mail: kompaniiets@unfpa.org. Should the supplier be unsatisfied with the reply provided by the UNFPA Head of the Business Unit, the supplier may contact the Chief, Procurement Services Branch at procurement@unfpa.org.
* **Disclaimer**

Should any of the links in this RFQ document be unavailable or inaccessible for any reason, bidders can contact the Procurement Officer in charge of the procurement to request for them to share a PDF version of such document(s).

**PRICE QUOTATION FORM**

|  |  |
| --- | --- |
| **Name of Bidder:** |  |
| **Date of the quotation:** | Click here to enter a date. |
| **Request for quotation Nº:** | UNFPA/UKR/RFQ/21/22 |
| **Currency of quotation:** | UAH |
| **Validity of quotation:***(The quotation shall be valid for a period of at least 2 months after the submission deadline)* |  |

***All prices must be exclusive of VAT tax, since UN and its specialized agencies are exercising zero VAT payer status***

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| --- | --- | --- | --- | --- | --- |
| Item | Description | Number of Staff by Level | Hourly Rate | Hours to be Committed | Total |
| 1. Professional Fees
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|  |  |  |  |  |  |
| *Total Professional Fees* | UAH |
| 1. Out-of-Pocket expenses
 |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| *Total Out of Pocket Expenses* | UAH |
| ***Total Contract Price, excl. VAT*** *(Professional Fees + Out of Pocket Expenses)* | UAH |



I hereby certify that the company mentioned above, which I am duly authorized to sign for, has reviewed RFQ UNFPA/UKR/RFQ/21/22 including all annexes, amendments to the RFQ document (if applicable) and the responses provided by UNFPA on clarification questions from the prospective service providers. Further, the company accepts the General Conditions of Contract for UNFPA and we will abide by this quotation until it expires.

|  |  |  |
| --- | --- | --- |
|  | Click here to enter a date. |  |
| Name and title | Date and place |

**ANNEX I:**

**General Conditions of Contracts:**

**De Minimis Contracts**

This Request for Quotation is subject to UNFPA’s General Conditions of Contract: De Minimis Contracts, which are available in: [English,](http://www.unfpa.org/resources/unfpa-general-conditions-de-minimis-contracts) [Spanish](http://www.unfpa.org/sites/default/files/resource-pdf/UNFPA%20General%20Conditions%20-%20De%20Minimis%20Contracts%20SP_0.pdf) and [French](http://www.unfpa.org/sites/default/files/resource-pdf/UNFPA%20General%20Conditions%20-%20De%20Minimis%20Contracts%20FR_0.pdf)