

NetCentrics Human Trafficking Compliance Plan Agreement #: HR-22-12

1. Applicability

In accordance with FAR 52.222-50(h), NetCentrics Corporation (NetCentrics) has developed this Human Trafficking Compliance Plan (the “Compliance Plan” or the “Plan”) to be implemented on United States Government contracts or subcontracts for supplies, other than commercially available off-the-shelf items, acquired outside the United States or services to be performed outside the United States and has an estimated value that exceeds \$500,000. The purpose of this Plan is to ensure employees, agents and subcontractors are aware of prohibited conduct under anti-trafficking regulations and laws, as well as actions that may result from violations.

2. Appropriateness of Plan

This Compliance Plan may be appropriately tailored with respect to the size and complexity of the contract and to the nature and scope of the activities to be performed for the Government, including the number of non-U.S. citizens expected to be employed and the risk that the contract or subcontract will involve services or supplies susceptible to trafficking in persons.

3. Plan Requirements

a. Awareness Program

NetCentrics implements internal policy memorandum HR-22-01, Combatting Trafficking in Persons, to comply with anti-human trafficking laws and regulations promulgated in the United States and those territories in which the Company operates. This policy is also summarized in NetCentrics’ Standards of Business Conduct. Memorandum HR-22-01 describes prohibited trafficking related activities and the actions that will be taken against employees for violations.

Additionally, NetCentrics includes Combatting Trafficking in Persons training, required for all employees with supplier delegation of authority, provides employees with general information, reporting requirements and examples of trafficking in the supply chain.

NetCentrics also periodically conducts specialized training on the Combatting Trafficking in Persons regulations, Policy and Plan as needed.

b. Process to Report

Any NetCentrics employees or third-party doing work on behalf of the Company are required to report information or knowledge of the actual or potential human trafficking violations to the Ombudsman, the employee’s supervisor / leader, Human Resources, International Compliance, or the Office of General Counsel. Reports to the Ombudsman may be made anonymously if desired, unless prohibited by local country law.

NetCentrics employees or third-party doing work on behalf of the Company may also report violations by contacting the Global Human Trafficking Hotline at 1-844-888-FREE or help@befree.org.

Retaliation against an individual who reports a violation is strictly prohibited.

c. Recruitment and Wage Plan

Per policy, NetCentrics permits only the use of recruitment companies who have trained employees, prohibit charging recruitment fees to the employee and ensure that wages meet applicable host country legal requirements or explain any variance.

d. Housing Plan

NetCentrics uses internal policies to ensure housing meets host country housing and safety standards.

e. Procedures for Agents & Subcontractors

All NetCentrics agents and subcontractors must agree to comply with Policy Memorandum HR-22-01 and all applicable anti-trafficking laws and regulations. Rockwell Collins has included FAR 52.222-50 and FAR 52.222-56 in supplier agreements where applicable.

NetCentrics agents and subcontractors must have procedures to prevent trafficking in persons and to monitor, detect and terminate any agents, subcontracts or subcontractor employees that have engaged in such activities.

4. Posting

This Plan is also available to the Contracting Officer upon request.

NetCentrics will post this Plan at the workplace (unless the work is to be performed in the field or not in a fixed location) and on its external website, <https://netcentrics.com>.

5. Certification

Annually after receiving an award, NetCentrics will certify to the government that;

1) it has implemented a compliance plan to prevent any prohibited human trafficking activities and to monitor, detect and terminate any agent, subcontractor or subcontractor employee engaging in prohibited activities and,

2) After having conducted due diligence, to the best of NetCentrics' knowledge and belief, neither it nor any of its agents, subcontractors or their agents are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, NetCentrics or its subcontractor has taken the appropriate remedial and referral actions.

1 Revision History

Revision No.	Reason/Description of Changes	Author	Effective Date
1.0	Original issue and upload to Document Control System.	Pam Frank	12/27/2022