

Anti-Human Trafficking Compliance Plan

1. Applicability

In accordance with FAR 52.222-50(h), Praescient Analytics, LLC has developed this Anti-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

Praescient Analytics, LLC has adopted in its Code of Ethics and Standards of Conduct a policy on Anti-Trafficking in Persons ("Policy") 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 the Company's Employee Handbook. The Policy describes prohibited trafficking related activities and the actions that will be taken against employees for violations. Additionally, Praescient Analytics includes an overview of Combatting Trafficking in Persons during new hire indoctrination periods as well as third-party/subcontractors indoctrination periods. This training, required for all employees and third-party/subcontractors, provides employees with general information, reporting requirements and examples of trafficking. Praescient Analytics also periodically conducts specialized training on the Combatting Trafficking in Persons regulations, Policy and Plan as needed.

b. Process to Report

Any Praescent Analytics 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 (if available), the employee's supervisor / leader, Human Resources, or General Counsel. Reports to General Counsel may be made anonymously if desired, unless prohibited by local country law.

Praescent Analytics 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 the Compliance Plan, Praescent Analytics 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

If/when Praescent Analytics provides or arranges for housing facilities on behalf of employees and/or third parties, the housing will meet the host country housing and safety standards.

e. Procedures for Employees & Subcontractors/Third Parties

All Praescent Analytics employees and subcontractors must agree to comply with the Compliance Plan and all applicable anti-trafficking laws and regulations. Praescent Analytics has included FAR 52.222-50 and FAR 52.222-56 in service agreements where applicable.

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

4. Posting

Praescient Analytics 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, www.praescientanalytics.com. This Plan is also available to the Contracting Officer upon request.

5. Certification

Annually after receiving an award, Praescient Analytics 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 Praescient Analytics' knowledge and belief, neither it nor any of its employees, subcontractors or their employees are engaged in trafficking activities; or if abuses related to any of the prohibited trafficking activities have been found, Praescient Analytics or its subcontractor has taken the appropriate remedial and referral actions.