

FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT (FFATA)– SUBCONTRACTS UNDER PRIME CONTRACTS

FAR 52.204-10 Reporting Executive Compensation and First-Tier Subcontract Awards: Section 2(d)(2) of the Federal Funding Accountability and Transparency Act of 2006 (Public Law 109-282), as amended by section 6202 of the Government Funding Transparency Act of 2008 (Public law 110-252) requires Prime contractors to report subcontract/purchase order **with a ceiling of \$30,000 or greater**, and the total compensation of the five most highly compensated executives of the subcontractor when certain criteria are met. The law requires all reported information be made public, worldwide (www.usaspending.gov); therefore, the information provided to Palladium will be made public. As a subcontractor or potential subcontractor to Palladium, unless otherwise directed by a contracting officer, Palladium shall report the following information in accordance with the FAR clause at 52.204-10.

By signing below, the Subcontractor/Supplier represents and certifies that this certificate is accurate, curate, and complete and that the signer is duly authorized to make such certification on behalf of the Subcontractor/Supplier.

Subcontract Information <i>(to be completed by Palladium)</i>		
Prime Contract Number:	Prime Contract Name:	
Subcontract Number:	Palladium Project No:	Country of Performance:

Subcontractor Information	
a. Is the subcontractor registered in the System for Award Management (SAM) database?	<p style="text-align: center;">Yes.</p> <p style="text-align: center;">No.</p> <p>If yes, proceed to (b). If no, proceed to (c).</p>
b. What is the subcontractor's Unique Entity Identifier (UEI)?	<p style="text-align: center;">UEI (as shown in SAM) is:</p> <p style="text-align: center;">Not applicable. Proceed to (c).</p> <p>If yes, enter UEI and proceed to (c). If not applicable, proceed to (c).</p>
c. Does the subcontractor have a parent company?	<p style="text-align: center;">Yes. If yes, the parent company's UEI is:</p> <p style="text-align: center;">No.</p> <p>If yes, enter parent company's UEI and proceed to (d). If no, proceed to (e).</p>

d. Parent Address	Street		
	City/State		
	Zip Code +4 (<i>nine digits required</i>)		
	Country		
	Congressional District (required if in the United States)		
e. North American Industry Classification System (NAICS) Code of work performed			
f. Legal Business Name (by which it is incorporated and pays taxes)	As it appears in SAM:		
g. Doing Business As (DBA) Name	As it appears in SAM:		
h. Does the subcontractor commonly use another name?	<p>Yes. If yes, the other name is:</p> <p>No.</p>		
i. Subcontractor's Physical Address (as it appears in SAM; P.O. Box or c/o may not be used)	Street		
	City/State		
	Zip Code +4 (<i>nine digits required</i>)		
	Country		
	Congressional District (required if in the United States)		
j. Primary Performance Location of the Subcontract Work (P.O. Box or c/o may not be used) Check here if same address as i)	Street		
	City/State		
	Zip Code +4 (<i>nine digits required</i>)		
	Country		
	Congressional District (required if in the United States)		
k. Did the subcontractor's gross income in the previous tax year exceed US \$300,000?	Yes	No	If yes, complete l. thru p., then move to Subcontractor Certification and Signature

l. Amount of Subcontract (in US\$)	
m. Date of Subcontract (MM/DD/YYYY)	
n. Subcontract Summary of Work (overall purpose and expected outcomes or results of the subcontract, including significant deliverables and, if appropriate, associated units of measure)	
o. Funding Agency Name	
p. Funding Agency ID (USAID=7200, CDC=7523, DOS=1900, DOD=1700)	

Compensation Reporting Determination

<p>q. In your business or organization's previous fiscal year, did the business or organization (the legal entity to which the UEI provided in section (a) belongs) receive:</p> <p style="margin-left: 20px;">(1) 80% or more of its annual gross revenues in U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements.</p> <p><u>AND,</u></p> <p style="margin-left: 20px;">(2) US \$25,000,000 or more in annual gross revenues from U.S. federal contracts, subcontracts, loans, grants, subgrants, and/or cooperative agreements?</p>	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center; vertical-align: top;">YES</td> <td style="width: 50%; text-align: center; vertical-align: top;">NO</td> </tr> </table> <p style="margin-top: 20px;">If both answers are yes, continue to (r). If only one answer is yes, then continue to Subcontractor Certification and Signature.</p> <p style="margin-top: 10px;">If one or both answers are no, then continue to Subcontractor Certification and Signature.</p>	YES	NO
YES	NO		
<p>r. Does the public have access to information about the compensation of the executives in your business or organization (the legal entity to which the UEI provided in section (a) belongs) for the previous fiscal year, through periodic reports filed under section 13(a) and 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986?</p>	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; text-align: center; vertical-align: top;">YES</td> <td style="width: 50%; text-align: center; vertical-align: top;">NO</td> </tr> </table> <p style="margin-top: 10px;">If yes, check the appropriate box below and proceed to Subcontractor Certification and Signature.* If no, proceed to (s) and complete the information accordingly.</p> <p style="margin-top: 10px;">Which one are you claiming:</p> <p style="margin-left: 20px;">15 U.S.C. 78m(a)</p> <p style="margin-left: 20px;">15 U.S.C. 78o(d)</p> <p style="margin-left: 20px;">Section 6104</p> <p style="margin-top: 20px; font-size: small;">*While you do not need to submit to Palladium supporting data, you will need to have this data available to Palladium and the U.S. Government in an audit within reasonable time of written notice.</p>	YES	NO
YES	NO		

s. Names and Total Compensation of 5 Most Highly Compensated Executives**		
Name	Title	Annual Total Compensation in US\$**
1.		
2.		
3.		
4.		
5.		

Compensation for senior executives shown above is for calendar year 20 _____. The Subcontractor's fiscal year end date is _____(MM/DD/YYYY).

**Total compensation: Cash and noncash dollar value earned during the preceding fiscal year and includes: salary and bonus awards of stock options, and stock appreciation rights/earnings for services under non- equity incentive plans which does not include group life, health, hospitalization or medical reimbursement plans that do not discriminate in favor of executives, and are available generally to all salaried employees/change in pension value. This is the change in present value of defined benefit and actuarial pension plans/above – market earnings on deferred compensation which is not tax-qualified/ other compensation, if the aggregate value of all such other compensation (e.g., severance, termination payments, value of life insurance paid on behalf of the employee, perquisites or property) for the executive exceeds US \$10,000.

Subcontractor Certification and Signature		
I, _____(name), hereby certify that the information submitted herein is, to the best of my knowledge, complete and accurate as of the date indicated below.		
Name		
Title		
Phone Number		Email Address
Date		
Signature		