

CORPORATE GOVERNANCE

Anti-Bribery & Anti-Corruption Policy

Prohibited conduct, approval thresholds, third-party due diligence, controls and reporting obligations.

VERSION 2.0 · EFFECTIVE 15 SEPTEMBER 2026

DOCUMENT CONTROL

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APPROVED BY	Farshad Mohammadi, Managing Member
OWNER	Managing Member
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RELATED DOCUMENTS	FX-POL-001 sections 7 and 8, FX-POL-005 Supplier Code of Conduct, FX-POL-009 Grievance and Whistleblowing Procedure
REPORTING CONTACT	compliance@foxtrotllc.com
CLASSIFICATION	Public. May be distributed to clients, suppliers, regulators and supplier registration portals

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1 Policy statement

Foxtrot LLC prohibits bribery and corruption in every form, in every country, without exception. We do not offer, promise, give, authorize, request, agree to receive, or accept anything of value in order to win business, retain business, influence a decision or official act, secure an approval or clearance, or obtain any other improper advantage.

NO COMMERCIAL OVERRIDE

This prohibition has no commercial override. We accept the loss of a contract, a delayed shipment, a missed delivery date, or a grounded aircraft rather than make a corrupt payment. No one at Foxtrot LLC has authority to approve a deviation from this policy, including the Managing Member.

2 Why this matters in our business

Our work puts us in routine contact with people who hold decision-making power over our clients' assets and our own ability to deliver. That includes civil aviation authority inspectors and delegated representatives, customs and border officials, airport authorities and handling agents, and the staff of airlines that are owned or controlled by governments.

Much of our commercial pipeline is with state-owned or state-controlled flag carriers. Employees of those airlines are treated as government officials under anti-corruption law even when they are performing ordinary commercial procurement work. A payment to a procurement manager at a state-owned carrier carries the same legal exposure as a payment to a minister.

Our work also happens under time pressure. Aircraft on ground situations, lease return deadlines, ferry permit timelines, and customs holds all create the exact conditions in which someone suggests a payment to make a problem disappear. That pressure is not a defense and is not a reason to deviate from this policy.

3 Scope

This policy applies to:

- the Managing Member, all employees, and all officers;
- all contractors, subcontractors, consultants, agents, brokers, freight forwarders, customs brokers, and representatives acting for Foxtrot LLC or on its behalf;
- all joint venture, teaming, referral, and reseller arrangements.

It applies to conduct anywhere in the world, whether or not the conduct is customary locally.

4 Laws we are subject to

- **United States Foreign Corrupt Practices Act (FCPA)**, including both the anti-bribery provisions and the books and records and internal controls provisions. Foxtrot LLC is a US entity, so the FCPA applies to our conduct worldwide, including conduct by third parties acting for us.
- **Canadian Corruption of Foreign Public Officials Act (CFPOA)**, which applies to our activity conducted from Canada and which contains no facilitation payment exception.

- **UK Bribery Act 2010**, where we have a business nexus in the United Kingdom. It covers commercial bribery between private parties, not only officials.
- The anti-corruption, anti-kickback, and gift laws of every country we work in, including the laws of the Kingdom of Saudi Arabia, the United Arab Emirates, Jordan, and the European Union member states where we operate.

Where laws differ, we apply the strictest standard.

5 Definitions

Anything of value is not limited to cash. It includes gifts, discounts, travel, accommodation, meals, entertainment, event tickets, upgrades, flight benefits, loans, use of aircraft or vehicles, employment or internships for relatives, charitable or political contributions made at someone's request, favorable contract terms, business referrals, and free or discounted services.

Government official includes any officer or employee of a government, agency, or department; any employee of a state-owned or state-controlled enterprise, including flag carriers, national MROs, airport authorities, and sovereign lessors; civil aviation authority staff and inspectors; customs, immigration, and border officials; military personnel; officials of international organizations such as ICAO and IATA; political party officials and candidates; and members of a royal family where they exercise official functions.

Bribe means anything of value given, offered, promised, requested, or accepted with the intent to influence a decision, obtain or retain business, or secure an improper advantage.

Kickback means the return of a portion of a payment, fee, or contract value as a reward for awarding or facilitating business.

Facilitation payment means a small payment to a low-level official to secure or speed up a routine action the official is already obliged to perform, such as processing paperwork, releasing a shipment, issuing a permit, or granting access.

6 Prohibited conduct

The following are prohibited without exception:

1. Offering, promising, or giving anything of value to a government official or a private counterparty to influence a decision or obtain an advantage.
2. Requesting or accepting anything of value that could influence, or appear to influence, our technical findings, recommendations, vendor selection, or acceptance decisions.
3. Paying or accepting kickbacks, including on parts sales, MRO referrals, freight, or software licences.
4. Facilitation payments of any size, in cash or in kind, including payments to expedite customs clearance, part release, permit issuance, inspection scheduling, hangar access, or slot and handling arrangements.
5. Using a third party, including an agent, broker, forwarder, or consultant, to do anything this policy prohibits us from doing directly, or making a payment while ignoring signs that it will be passed on improperly.
6. Making a charitable donation, sponsorship, political contribution, or hiring decision at the request of, or to benefit, someone in a position to award or influence business.

7. Falsifying, omitting, or mischaracterizing any entry in our books and records relating to a payment, expense, commission, fee, or gift.
8. Retaliating against anyone who refuses to participate in prohibited conduct or who reports a concern.

7 The one exception: safety-related payments under duress

PERSONAL SAFETY TAKES PRIORITY

If a payment is demanded under credible threat to personal safety, health, or liberty, make the payment. Preserving a life takes priority over this policy.

The payment must then be:

1. reported to the Managing Member as soon as it is safe to do so;
2. recorded accurately in the books as a payment made under duress, not disguised as a fee or expense;
3. reported to the affected client and, where required, to counsel and the relevant authority.

This exception is narrow. Commercial pressure, an AOG situation, a threatened delay, a withheld release, or a lost contract does not qualify.

8 Legitimate payments that are permitted

This policy does not prohibit paying lawful, published, official charges, such as:

- certification, registration, permit, overflight, landing, parking, and handling fees;
- customs duties, taxes, and brokerage charges;
- expedited processing fees that are officially published and available to any applicant on the same terms;
- authority inspector or delegated representative fees charged under a published schedule or written engagement.

These payments must be supported by an official invoice or receipt, made to the official entity rather than to an individual, and recorded accurately. If a payment is requested in cash, to a personal account, to a third country, or without documentation, treat it as a red flag and escalate before paying.

9 Gifts, hospitality, and travel

Hospitality is only acceptable when it is modest, occasional, customary, transparent, properly recorded, and not intended or likely to influence a decision.

Never permitted

- cash or cash equivalents, including gift cards, vouchers, and prepaid cards;
- anything given or received while a bid, tender, inspection, acceptance, dispute, claim, audit, or supplier registration is open;
- anything given to or received from a government official beyond a nominal courtesy, where local law or the official's own rules prohibit it;

- travel, flights, upgrades, or accommodation paid by a counterparty, unless it is within the engagement scope and disclosed in writing to the client;
- anything routed through a family member, intermediary, or personal account;
- anything the giver or the recipient would prefer not to be recorded.

Approval thresholds

VALUE PER OCCASION, PER RECIPIENT	REQUIREMENT
Under USD 50	Permitted, no pre-approval, record if recurring
USD 50 to USD 150	Permitted with written pre-approval by the Managing Member, entered in the Gifts and Hospitality Register
Above USD 150	Prohibited unless there is a documented business justification, written pre-approval, and confirmation that the recipient's own employer permits it
Any amount to a government official	Written pre-approval required regardless of value

Splitting a gift into smaller amounts to stay under a threshold is a violation of this policy.

A **Gifts and Hospitality Register** is maintained by the Managing Member recording the date, giver, recipient, employer, description, estimated value, business reason, and approval. It is retained for seven years and is available for client and auditor review.

10 Third parties, agents, and intermediaries

Most enforcement actions in this industry arise from the conduct of intermediaries, not employees. We are responsible for what our third parties do for us.

Before engaging an agent, broker, consultant, freight forwarder, customs broker, or local representative, we carry out risk-based due diligence covering:

- legal name, registration, ownership, and beneficial ownership;
- identification of any government official, or relative of one, among the owners, directors, or staff;
- sanctions, denied party, debarment, and adverse media screening;
- the commercial rationale for using this party, and whether the fee is proportionate to the work actually performed;
- references and evidence of relevant licences or approvals.

Findings are documented in the third-party due diligence record, with the date of screening, the sources used, the conclusion, and the approver. Records are retained for at least seven years. Higher-risk engagements are re-screened at renewal, and at least every two years.

All third-party agreements must be in writing and include, at minimum: a description of actual services, a fee basis that is proportionate and payable to the contracting entity, compliance with this policy and applicable

anti-corruption law, acceptance of FX-POL-005 Supplier Code of Conduct, no subcontracting without consent, audit and records access rights, and termination for suspected corrupt conduct.

Prohibited third-party arrangements

- success fees or commissions contingent on obtaining a government approval, permit, certificate, or customs release;
- payments to a party different from the contracting entity, to a personal account, or to an account in an unrelated jurisdiction;
- cash payments;
- undocumented or vaguely described fees, including "consulting", "facilitation", "expediting", or "local costs" with no supporting detail;
- an agent selected or insisted upon by a counterparty or official without a documented business reason.

11 Red flags

Escalate to the Managing Member before proceeding if any of the following appear:

- a request for payment in cash, to a personal account, to a third country, or without an invoice;
- a request for an unusual discount, rebate, credit note, or overbilling arrangement;
- a counterparty asking for payment of travel or personal expenses;
- a suggestion that a technical finding be softened, removed, or delayed in exchange for anything;
- a customs, permit, or release problem that "can be solved" through a specific individual or a specific agent;
- an official or state-owned airline employee with an undisclosed interest in a supplier we are asked to use;
- pressure to skip due diligence or sign a contract before compliance review because of a deadline or AOG;
- reluctance to accept anti-corruption terms in a contract;
- a fee that is disproportionate to the service, or a commission structure the other party will not put in writing;
- a request tied to an open tender, inspection, acceptance, or supplier registration.

RAISING A RED FLAG IS PROTECTED

Raising a red flag is expected and protected. Being wrong about one carries no consequence.

12 Books, records, and internal controls

Every payment, expense, commission, fee, gift, and hospitality item is recorded accurately, in reasonable detail, in the period it occurs, with supporting documentation. There are no off-book accounts, undisclosed funds, false or inflated invoices, or misleading descriptions.

Controls in place:

- Managing Member approval and supporting documentation required for all third-party payments;
- no cash disbursements other than documented petty expenses;

- expense claims supported by receipts and a stated business purpose, including the names and employers of anyone hosted;
- Gifts and Hospitality Register and third-party due diligence records maintained and reviewed at least annually;
- records retained for at least seven years.

The Managing Member reviews these controls at least once a year, together with any reports received and any red flags raised, and records the review. Where the review finds a gap, the control is changed and the change is recorded.

Falsifying a record to conceal a payment is treated as seriously as the payment itself.

13 Charitable donations, sponsorship, and political activity

Charitable donations and sponsorships are permitted only to legitimate organizations, for a genuine purpose, documented, and never made at the request of, or to benefit, anyone in a position to award or influence business. Donations are not made in return for a contract, approval, or favorable treatment.

Foxtrot LLC makes no political contributions of any kind, in any jurisdiction. Personal political activity is private, conducted on personal time and with personal funds, and must not imply company endorsement.

14 Client and counterparty compliance requirements

Where a client imposes its own anti-corruption terms, supplier code, or compliance certification, we comply with those terms in addition to this policy, and we apply the stricter standard where they differ.

We will not sign a contract clause that requires, or would in practice require, conduct prohibited by this policy or by the FCPA, CFPOA, or applicable sanctions and antiboycott law. Such clauses are referred to counsel before signature.

15 Training and communication

The Managing Member completes anti-corruption refresher training annually. Employees and long-term contractors receive this policy at onboarding, confirm they have read it, and receive refresher briefing annually. Higher-risk engagements, meaning work in higher-risk jurisdictions or involving officials, intermediaries, or state-owned counterparties, receive a specific briefing before mobilization. Completion is recorded with the date, the participant, and the topics covered, and the record is retained for seven years.

This policy is published on the Foxtrot LLC website and provided to clients, supplier registration portals, and third parties on request.

16 Reporting concerns and non-retaliation

Report any suspected bribery, corruption, kickback, falsified record, or attempt to solicit a payment to:

REPORTING CONTACT

Farshad Mohammadi, Managing Member

Foxtrot LLC, 12112 N Rancho Vistoso Blvd, STE 100, Oro Valley, AZ 85755, United States

Email: compliance@foxtrotllc.com

Anonymous reports accepted, in any language, from anyone inside or outside the company.

Reports may be made anonymously and are treated confidentially so far as possible. Where a concern involves the Managing Member, it may be raised directly with the client's compliance function, with company counsel, or with the relevant authority. Handling and timescales are set out in FX-POL-009.

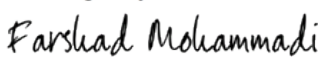
Retaliation against anyone who reports a concern in good faith, or who refuses to take part in prohibited conduct, is a violation of this policy. Nothing in this policy limits anyone's right to report to a government agency, regulator, or law enforcement body, or to receive a whistleblower award.

17 Consequences of violation

Violations may result in removal from an engagement, termination of employment or contract, termination of a third-party relationship, recovery of losses, and referral to law enforcement. Individuals who violate anti-corruption law face personal criminal liability, including imprisonment and fines that a company is not permitted to pay on their behalf.

18 Approval

This Anti-Bribery & Anti-Corruption Policy is adopted on behalf of Foxtrot LLC and takes effect on the date shown on the cover of this document. It supersedes version 1.0.

DocuSigned by:

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FARSHAD MOHAMMADI, MANAGING MEMBER

15 September 2026

DATE

Revision history

VERSION	DATE	SUMMARY OF CHANGE	APPROVED BY
2.0	15 September 2026	Replaced placeholder contact details with compliance@foxtrotllc.com . Added third-party screening record requirements, training records, annual controls review, and cross-references to FX-POL-005 and FX-POL-009.	Farshad Mohammadi, Managing Member
1.0	12 September 2026	First issue.	Farshad Mohammadi, Managing Member

Controlled electronically. The authoritative version is the one published at foxtrotllc.com/policies.