

CORPORATE GOVERNANCE

Human Rights Policy Statement

Commitments, governance, risk analysis, preventive measures, grievance handling and remediation across Foxtrot LLC operations and its supply chain.

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DOCUMENT CONTROL

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ISSUED BY	Foxtrot LLC, an Arizona limited liability company
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APPROVED BY	Founder and Managing Member
OWNER	Founder and Managing Member
NEXT REVIEW	Annually, or upon material change to operations or applicable law
APPLIES TO	The company, its officers and members, all employees, and all contractors, consultants and temporary personnel, wherever located
RELATED DOCUMENTS	FX-POL-005 Supplier Code of Conduct, FX-POL-006 to FX-POL-011, FX-POL-010 Human Rights and Supply Chain Due Diligence Procedure, FX-REC-001 risk analysis record, FX-REP-001 due diligence statement
GRIEVANCE CONTACT	compliance@foxtrotllc.com
CLASSIFICATION	Public. Published without gating; provided to clients, suppliers, regulators and supplier registration portals

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1 Purpose and commitment

Foxtrot LLC respects internationally recognised human rights in everything it does. This statement sets out the standards the company holds itself to, the standards it expects of the people and businesses it works with, and how it identifies, prevents, addresses and reports adverse human rights impacts connected to its activities.

Foxtrot LLC is a technical services and software company serving the commercial aviation sector. Its work consists of engineering and airworthiness services, technical representation, records and asset inspection, parts logistics coordination, and the development and licensing of software. The company does not manufacture goods, operate production facilities, or extract raw materials. Its human rights risk profile is accordingly low, but the commitment set out here is unconditional and applies regardless of scale.

2 Scope

This policy applies to the company, its officers and members, all employees, and all contractors, consultants and temporary personnel engaged by the company, wherever they are located and whatever the duration of the engagement.

It also sets the expectations the company applies to its suppliers, subcontractors, agents and other business partners, including those in its extended supply chain. Those expectations are stated in full in FX-POL-005 Supplier Code of Conduct, which is provided at the point of engagement.

The policy covers the company's own operations, its direct and indirect supply chain, the services and software it supplies, and any project work it takes on.

3 Standards and frameworks

This policy is informed by and aligned with the following instruments:

- The United Nations Universal Declaration of Human Rights.
- The United Nations International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.
- The United Nations Guiding Principles on Business and Human Rights.
- The International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the ILO core conventions, including those addressing forced labour, child labour, discrimination, and freedom of association and collective bargaining.
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- The United Nations Global Compact principles on human rights and labour.

Where local law sets a lower standard than these instruments, the company applies the higher standard to the extent permitted by law. Where local law conflicts with them, the company seeks ways to honour the principles of internationally recognised human rights without breaching applicable law.

Instruments for groups requiring particular attention

Some groups face heightened risk of harm, and the company commits explicitly to the standards set out for them in the following instruments:

- The Convention on the Elimination of All Forms of Discrimination Against Women.
- The Convention on the Rights of the Child.
- The International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.
- The Convention on the Rights of Persons with Disabilities.
- The United Nations Declaration on the Rights of Indigenous Peoples.
- The United Nations Declaration on the Rights of Persons Belonging to National or Ethnic, Religious and Linguistic Minorities, including Roma, Sinti and traveller communities.
- The United Nations Declaration on the human rights of people of African descent.
- The United Nations Guiding Principles on Extreme Poverty and Human Rights.
- The protections owed to refugees, asylum seekers and internally displaced people under the Refugee Convention and its Protocol.

4 Governance and accountability

Foxtrot LLC is a single-member limited liability company. The Founder and Managing Member is its highest governance body, and human rights oversight sits with that role directly rather than with a committee. The Managing Member approves this policy, owns human rights due diligence, decides on remedial action, and is the designated point of contact for human rights matters.

Specific accountabilities held at that level are:

- approving this policy and any revision to it;
- commissioning and signing off the annual human rights risk analysis;
- assigning, funding and tracking preventive and remedial measures;
- deciding whether to suspend or end a business relationship on human rights grounds;
- reviewing every report received through the grievance channel;
- approving the annual public due diligence statement.

Human rights due diligence objectives are set for the Managing Member at the start of each review period, and delivery against them is assessed in the annual review and recorded in FX-REC-001. Where the company introduces variable compensation, a bonus, or a management incentive of any kind, delivery of these objectives is a condition of it.

As the company grows, a named human rights officer will be appointed below the Managing Member and this policy will be updated to record the appointment.

5 Commitments

Foxtrot LLC commits to the following, and expects the same of its business partners.

Forced labour, modern slavery and human trafficking

The company prohibits forced, bonded, indentured and involuntary prison labour, and any form of human trafficking, in its own operations and in its supply chain. No worker is required to surrender identity documents, pay recruitment fees or related costs, or lodge deposits as a condition of employment. Workers are not required to use company-provided accommodation and their freedom of movement is not restricted. All employment is entered into freely, terms are agreed in writing before work starts, and workers are free to leave on reasonable notice.

Child labour and young workers

The company does not employ anyone below the applicable minimum working age or below the age of completion of compulsory schooling, and in no case below fifteen years. It does not engage anyone under eighteen in hazardous work, which includes all work on or around aircraft, ramps, hangars and maintenance facilities. Age is verified from identity documents before any engagement begins, and the same verification is required of suppliers and subcontractors who supply personnel to our work.

Non-discrimination, harassment and dignity at work

The company does not discriminate on the basis of race, colour, ethnicity, national extraction, social origin, religion or belief, sex, gender identity, sexual orientation, age, disability, marital or family status, political opinion, union membership, veteran status, or any other protected characteristic. Recruitment, pay, training, promotion and termination decisions are based on ability and performance. Harassment, bullying, intimidation, retaliation, corporal punishment and any form of physical or verbal abuse are prohibited. FX-POL-008 sets out how this is implemented and monitored.

Groups requiring particular attention

The company takes additional care where an engagement involves women in male-dominated work settings, young workers, migrant workers, workers supplied through labour agencies, indigenous peoples and local communities, persons with disabilities, members of ethnic, religious or linguistic minorities, and refugees or displaced people. Where such a group may be affected, the risk analysis considers that group specifically, the measures taken are adapted to it, and contact is sought with the group or its legitimate representatives rather than assumed on their behalf.

Health and safety

The company provides a safe working environment and complies with applicable occupational health and safety law. Because much of its work is carried out at customer, maintenance and airport facilities, personnel are briefed on and comply with the site safety rules of the host organisation, and are equipped and trained for the tasks assigned to them. Personnel have the right and the obligation to stop work they reasonably believe to be unsafe, without fear of reprisal. Incidents, injuries and near misses are recorded and reviewed. FX-POL-007 sets out the arrangements in detail.

Freedom of association and collective bargaining

The company respects the right of workers to form and join trade unions and worker representative bodies of their choosing, to bargain collectively, and to engage in lawful industrial action, without discrimination, reprisal or interference. No term of engagement used by the company restricts that right. Where these rights are restricted by law, the company does not obstruct alternative lawful means of worker representation. This position is confirmed at each annual review and recorded.

Wages, benefits and working hours

The company pays at least the applicable legal minimum or prevailing industry wage, whichever is higher, together with all legally mandated benefits, and pays in full, directly to the worker, and on time. Wage deductions as a disciplinary measure are prohibited.

LIVING WAGE COMMITMENT

No person engaged by Foxtrot LLC, whether as an employee or as an individual contractor, is paid less than the applicable living wage for the place where they work. The company uses the MIT Living Wage Calculator rate for the relevant United States county, the Ontario Living Wage Network rate for engagements based in Ontario, and the nearest equivalent published benchmark elsewhere, and applies whichever is higher, that benchmark or the legal minimum. The rate is checked before an engagement is priced, reviewed annually, and the check is recorded in FX-REC-001.

Working hours, rest periods and leave comply with applicable law, with ILO standards on maximum working hours, minimum breaks and rest periods, and with aviation duty and rest limitations where these apply. Workload, task allocation and deadlines are set so that they can be met within those limits, and field work is planned around travel and fatigue rather than in spite of it. Terms of engagement are documented in writing in a language the worker understands.

Privacy, data protection and product responsibility

The company handles personal data of employees, customers and end users lawfully, proportionately and securely, and designs its software products so that personal data is collected only where there is a legitimate operational purpose. It does not build or supply capabilities intended for unlawful surveillance of individuals, nor tools for monitoring, ranking or disciplining named individuals where that use is unlawful or has not been agreed with the workforce concerned. FX-POL-004 and FX-POL-011 set out the product and information security commitments that support this.

Land rights, tenure, communities and security arrangements

The company does not acquire, use or develop land in a way that deprives any person of the basis of their livelihood, and does not carry out or commission unlawful eviction or the unauthorised appropriation of land, forest or water. It recognises legitimate tenure rights, including customary and collective rights, consistent with the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security.

The company does not engage private or public security forces. Should it ever do so, it will require that any such arrangement respects the prohibition on torture and on cruel or degrading treatment, and on injury to life or limb, that personnel are instructed and supervised, and that the arrangement complies with the Voluntary Principles on Security and Human Rights.

Water, sanitation and environment-related human rights

The company complies with applicable environmental law and with the obligations of the Minamata Convention on mercury, the Stockholm Convention on persistent organic pollutants, and the Basel Convention on the transboundary movement of hazardous waste, insofar as they apply to its activities. It does not cause harmful soil change, water or air pollution, harmful noise emission or excessive water consumption that would impair a person's health, food production, or access to safe drinking water and sanitation. Risks to the right to water and sanitation are considered in the annual risk analysis, in line with the

United Nations Sustainable Development Goals and the CEO Water Mandate principles. FX-POL-006 sets out the environmental and responsible sourcing arrangements.

Protection of legally established rights and positions

The company does not impair a protected legal position of any person, including rights of ownership, use, tenure and access that are established in law or by legitimate custom, and does not act through a third party to do so.

6 Business partners and supply chain

Foxtrot LLC requires its suppliers, subcontractors, agents and business partners to meet the standards in FX-POL-005 and to hold their own suppliers to equivalent standards. The Supplier Code is provided at the point of engagement, is incorporated by reference into purchase orders and contracts, and is acknowledged in writing before mobilisation for higher-risk engagements.

Human rights conduct is a factor in awarding and renewing work. Suppliers that meet the Code and provide evidence on request are given preference at award, longer or renewed engagement terms, and consideration for further work. Where the company becomes aware that a business partner has caused or contributed to an adverse human rights impact, it raises the matter, agrees corrective action with a deadline, verifies completion, and, if the partner is unwilling to remedy a severe violation, suspends or terminates the relationship.

7 Risk analysis and due diligence

The company carries out a human rights risk analysis at least once a year, and additionally on an ad hoc basis when it enters a new market, engages a new category of supplier, takes on a materially different type of work, changes a product or service, or receives substantiated information suggesting a risk anywhere in its supply chain. The method is set out in FX-POL-010 and the result is recorded in FX-REC-001.

The analysis covers:

- the company's own operations and locations;
- the direct supply chain, meaning parties with which the company has a contractual relationship;
- the indirect supply chain, screened on the basis of country, sector and substantiated information;
- the services, software and project work the company supplies.

It considers the people who may be affected, including the company's own personnel, workers in the direct and indirect supply chain, local communities affected by the company's operations or by its supply chain, business partners and customers, and other stakeholders present where the work is carried out.

Information sources include internal records and engagement data, discussions within the company and with business partners, documentary research, published country and sector risk data such as ILO, OECD and government child and forced labour lists, sanctions, denied party and adverse media screening, and external expertise where a matter falls outside the company's competence.

Identified risks are prioritised using:

- the severity of the potential impact;
- the irreversibility of the potential impact;

- the number of people who could be affected;
- the likelihood of occurrence;
- the nature and extent of the company's own business activity in the situation;
- the nature of the company's causal contribution, whether it causes, contributes to, or is only linked to the impact;
- the company's ability to influence the party directly responsible;
- legal implications for the company.

The assessment distinguishes impacts the company causes directly from impacts indirectly associated with it through a business relationship, and records preventive measures against each.

IN-DEPTH EXAMINATION OF HIGH RISKS

Where a risk is assessed as high, the company does not rely on desk research alone. It seeks dialogue with the people who may be affected or with their legitimate representatives, draws on internal expertise, and engages external human rights or country expertise where the matter exceeds that expertise. The examination, its findings and the resulting measures are documented in FX-REC-001.

8 Preventive measures

Based on the risk analysis, the company identifies and implements measures to prevent or mitigate potential adverse impacts. Measures are applied in its own operations, in the direct supply chain, in the indirect supply chain where influence allows, and in relation to the services, software and project work it supplies. Where a matter is beyond the company's individual reach, it participates in industry or association initiatives that address it.

For every measure, the company records the risk it addresses, the objective, the person responsible, the deadline, how completion is verified, and the outcome. Objectives are communicated to the people expected to deliver them and, where they concern suppliers or clients, externally.

9 Grievance mechanism

Anyone may report a suspected human rights or labour standards violation relating to the company or its supply chain, whether or not they are connected to Foxtrot LLC. The channel is open to the company's own personnel, to workers in the direct and indirect supply chain, to local communities, to business partners and customers, and to anyone else affected.

HUMAN RIGHTS GRIEVANCE CHANNEL

Email compliance@foxtrotllc.com, or write to Foxtrot LLC, 12112 N Rancho Vistoso Blvd, STE 100, Oro Valley, AZ 85755, United States. Reports may be made in any language and may be submitted anonymously. No account, portal or form is required. Received and reviewed by the Founder and Managing Member. Published at foxtrotllc.com/policies.

The channel is designed so that the people who might need it can actually use it. It accepts any language, accepts anonymous reports, requires no technical knowledge and no login, is published openly rather than behind a client portal, and is required by FX-POL-005 to be made known by suppliers to their own personnel

rather than only to their management. Personnel and suppliers are asked at review whether the channel is usable and understood, and their comments are taken into account when it is revised. Handling, timescales, confidentiality and non-retaliation are set out in FX-POL-009.

The identity of anyone raising a concern is protected. Retaliation of any kind against a person who reports in good faith, or who takes part in an investigation, or who refuses to take part in a violation, is prohibited and is itself a violation of this policy.

10 Remediation

Where Foxtrot LLC has caused or contributed to an adverse human rights impact, it provides for or cooperates in remediation. Remedial action is proportionate to the severity of the impact and may include correcting the practice, compensating those affected, changing a process or a contract term, retraining, ending an engagement, or reporting the matter to the relevant authority. Any violation within the company's own operations is ended immediately. Where the impact arises at a business partner, the company uses its leverage to obtain remedy and escalates as set out in FX-POL-005.

11 Training and communication

This policy is provided to every employee and contractor at the start of their engagement, and they confirm they have read it. It is published openly, provided to clients, suppliers, regulators and supplier registration portals, and available to anyone on request.

Personnel receive briefing appropriate to their role, and in any case covering: child labour and young workers; forced labour, modern slavery and trafficking; occupational health and safety; freedom of association and collective bargaining; discrimination, harassment and inclusion; wages, living wage and working hours; land, forest and water rights; misuse of security forces; protected legal positions; mercury under the Minamata Convention; persistent organic pollutants under the Stockholm Convention; handling, export and import of hazardous waste under the Basel Convention; anti-bribery and anti-corruption; export controls and sanctions; and data protection. Briefing is given at onboarding, refreshed at least annually, and given specifically before mobilisation on a higher-risk engagement. Completion is recorded.

12 Effectiveness monitoring

The company checks at least once a year whether the measures it has taken are working. The check considers whether assigned measures were completed on time, whether supplier acknowledgments and evidence were obtained, whether training was delivered, whether any reports were received through the grievance channel and how they were resolved, whether living wage and working hour commitments were met in practice, and whether any incident or near miss points to a gap.

The check includes dialogue with the people who may be affected. In practice that means asking personnel and subcontractors directly about working conditions, workload and safety on engagements, inviting comment on the grievance channel, and, where an identified risk affects a community or a group of workers elsewhere, seeking contact with them or with their legitimate representatives. Findings are recorded, and measures that are not working are changed rather than repeated.

13 Reporting and transparency

The company publishes a human rights due diligence statement every year at foxtrotllc.com/policies, without gating. The statement covers the risk analysis procedure and period, the human rights aspects identified, any actual impacts and reports received, the measures taken and their effect, the responsibilities defined within the company, and the priorities for the next period. FX-REP-001 is the current statement.

14 Documentation and review

The company documents its risk analyses, preventive measures, training, supplier acknowledgments, reports received, remedial actions taken and effectiveness checks, and retains that documentation for at least seven years.

This policy is reviewed at least annually by the Founder and Managing Member, and revised where the review, a substantiated report, or a change in the company's operations or in applicable law makes revision necessary.

15 Approval

This 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:  4620BECE0E724B4...	15 September 2026
FARSHAD MOHAMMADI, FOUNDER AND MANAGING MEMBER	DATE

Revision history

VERSION	DATE	SUMMARY OF CHANGE	APPROVED BY
2.0	15 September 2026	Added UN Covenants and instruments for groups requiring particular attention. Added measurable living wage commitment, tenure rights, water and sanitation. Expanded governance, risk analysis scope and prioritisation, preventive measures, training, effectiveness monitoring and public reporting. Cross-referenced FX-POL-007 to FX-POL-010.	Founder and Managing Member
1.0	10 September 2026	First issue.	Founder and Managing Member

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