

CORPORATE GOVERNANCE

Environmental & Responsible Sourcing Policy

Environmental commitments, convention obligations, hazardous materials handling and responsible sourcing across Foxtrot LLC operations and its supply chain.

VERSION 1.0 · EFFECTIVE 15 SEPTEMBER 2026

DOCUMENT CONTROL

DOCUMENT	Environmental & Responsible Sourcing Policy
DOCUMENT REFERENCE	FX-POL-006
ISSUED BY	Foxtrot LLC, an Arizona limited liability company
VERSION	1.0
EFFECTIVE DATE	15 September 2026
APPROVED BY	Farshad Mohammadi, Managing Member
OWNER	Managing Member
REVIEW CYCLE	Annual, or on material change to operations or applicable law
APPLIES TO	The Managing Member, all employees, and all contractors, subcontractors and agents acting for Foxtrot LLC, and to the goods and services supplied to it
RELATED DOCUMENTS	FX-POL-003 Human Rights Policy Statement, FX-POL-005 Supplier Code of Conduct, FX-POL-007 Occupational Health and Safety Policy
CONTACT	compliance@foxtrotllc.com
CLASSIFICATION	Public. Published without gating and provided to clients, suppliers and supplier registration portals

Contents

1 Purpose and environmental profile	3
2 Commitments	3
3 Conduct at customer, hangar and airport sites.....	4
4 Mercury: Minamata Convention.....	4
5 Persistent organic pollutants: Stockholm Convention	4
6 Hazardous waste: Basel Convention	4
7 Responsible sourcing of parts and materials	5
8 Land, water and community impact	5
9 Travel, energy and emissions	5
10 Suppliers and verification	6
11 Monitoring, reporting and review	6
12 Approval	6
Revision history.....	6

1 Purpose and environmental profile

This policy sets out how Foxtrot LLC manages its environmental impact and how it sources responsibly. It is written to be accurate about what a company of this size and type actually does, rather than to claim a footprint or a management system it does not have.

Foxtrot LLC provides aviation technical services and develops aviation software. It does not manufacture goods, operate production facilities, run a workshop or paint shop, hold a fuel or chemical inventory, extract raw materials, or own aircraft. Its direct environmental impact comes from three things: business travel to inspection and delivery sites, the handling of aircraft parts and dangerous goods in transit, and the energy consumed by the cloud infrastructure that runs its software.

Most of the environmental risk connected to our work sits at the facilities we visit and with the suppliers we use. This policy therefore covers our own conduct on those sites and what we require of those suppliers.

2 Commitments

Foxtrot LLC commits to:

- comply with applicable environmental law in every jurisdiction where it works, and with the environmental rules of every facility it enters;
- comply with the obligations of the Minamata, Stockholm and Basel Conventions insofar as they apply to its activities and to the goods it handles or procures;
- cause no 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;
- handle, declare and package dangerous goods only through trained personnel and only under IATA and ICAO requirements;
- require responsible sourcing and environmental compliance from suppliers through FX-POL-005, and verify it in proportion to risk;
- prefer the lower-impact option where it does not compromise safety or the accuracy of a technical finding, including remote records review, consolidated site visits, and shipping consolidation;
- measure and record what it can measure honestly, and state plainly what it does not measure.

CERTIFICATION STATUS

Foxtrot LLC does not hold ISO 14001 or any other third-party certified environmental management system, and does not claim one. It does not currently hold a CDP score. This policy is the company's own environmental management arrangement, proportionate to its size and activity, and is reviewed annually. Any certification obtained in future will be stated on foxtrotllc.com/policies with the certificate reference and date.

3 Conduct at customer, hangar and airport sites

Almost all field work takes place at facilities operated by someone else. On those sites we:

- follow the host organization's environmental procedures, waste segregation, and spill response rules, and ask for them where they are not given;
- do not carry out any activity that generates hazardous waste outside those procedures;
- use the host's designated routes for used oils, solvents, fuel samples, aerosols, rags, filters and batteries, and never place them in general waste;
- report a spill, leak, or containment failure we cause or find to the site immediately, and record it;
- avoid unnecessary running of ground power, auxiliary power units, and vehicles during inspections.

4 Mercury: Minamata Convention

Foxtrot LLC commits to the objectives of the Minamata Convention on Mercury. The company does not use, produce, trade or dispose of mercury or mercury compounds as part of its business.

Mercury can nevertheless appear in aviation work, most often in legacy instruments and in a small number of components or cargo consignments. Where mercury or a mercury-added product is identified in an aircraft, a component, or a shipment connected to our work, we:

- do not handle or ship it outside the applicable requirements;
- disclose it to the client, the operator, and the carrier as required;
- require the supplier or facility to use a licensed route for storage, transport and disposal;
- record the identification and the action taken.

Suppliers are bound by the equivalent requirement in FX-POL-005 Section 21.

5 Persistent organic pollutants: Stockholm Convention

Foxtrot LLC commits to the objectives of the Stockholm Convention on Persistent Organic Pollutants. The company does not produce, formulate, or use chemicals prohibited or restricted under the Convention.

Suppliers are contractually prohibited under FX-POL-005 Section 21 from producing or using chemicals prohibited under the Convention in connection with our work, and are required to notify us where a product they supply contains a listed substance. Where such a notification is received, the company will not accept the product into a client engagement without the client's informed agreement and a compliant handling route.

6 Hazardous waste: Basel Convention

Foxtrot LLC commits to the objectives of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal. The company does not generate, store, or trade hazardous waste in its own premises.

Where hazardous waste arises from work we coordinate, including used batteries, oxygen assemblies, fuel samples, solvents, and contaminated packaging, we require that it is handled, exported, imported and disposed of only in accordance with the Convention and applicable national law, through licensed handlers

and documented routes. We do not describe hazardous waste as anything other than what it is on any shipping or customs document.

7 Responsible sourcing of parts and materials

Our parts logistics work involves procuring, coordinating and shipping aircraft parts. Those parts contain metals and minerals, including tin, tantalum, tungsten and gold, that can originate in conflict-affected and high-risk areas.

Foxtrot LLC does not smelt, refine, or import raw minerals, and therefore sits far downstream of the point where responsible minerals due diligence is performed. Our approach is proportionate to that position:

- FX-POL-005 Section 21 requires every supplier of parts, components, or raw materials to confirm that it carries out due diligence consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and to provide its own or its supplier's declaration on request;
- we prefer suppliers that publish a conflict minerals or responsible sourcing declaration;
- we buy from approved-source distributors and OEM-authorized channels with traceable documentation, which is also our airworthiness requirement;
- where a client has its own responsible sourcing requirement, we pass it through to the supplier and return the evidence to the client.

We do not claim membership of the Extractive Industries Transparency Initiative or any minerals scheme, and we do not operate a smelter-level management system.

8 Land, water and community impact

Foxtrot LLC holds no land, operates no site of its own beyond a registered office, and undertakes no construction, extraction or land development. 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, and requires the same of suppliers under FX-POL-005 Section 22.

Risks to the right to water and sanitation are considered in the annual human rights risk analysis under FX-POL-010, in line with the United Nations Sustainable Development Goals and the CEO Water Mandate principles. The assessment covers water use at facilities where our personnel work, water risk in the countries where we deploy, and water-related impacts disclosed by suppliers. Findings are recorded in FX-REC-001.

9 Travel, energy and emissions

Business travel is the company's largest direct impact. We:

- carry out records, continuing airworthiness and technical review work remotely where doing so does not weaken the finding;
- combine site visits where geography allows, rather than making separate trips;
- select routings and durations that avoid repeat mobilisation, which also reduces fatigue risk under FX-POL-007;

- keep a travel record from which distance-based emissions can be estimated, and will publish an estimate once the data covers a full reporting year.

For the Synops platform, we prefer cloud regions and providers that publish their energy and carbon performance, and we take that into account alongside data residency and latency requirements when selecting a region.

We do not currently purchase offsets, and we make no carbon neutrality claim.

10 Suppliers and verification

Environmental requirements for suppliers are set out in FX-POL-005 Sections 20 to 22 and are part of our contract terms. Verification is proportionate to risk, as described in FX-POL-005 Section 26, and may include a written assessment, documentary evidence, or an audit of records relating to our work. A supplier that cannot meet these requirements, or that will not evidence them where asked, is not awarded further work.

11 Monitoring, reporting and review

The Managing Member reviews environmental performance at least once a year as part of the annual due diligence cycle. The review covers any spill, waste, or dangerous goods event connected to our work, supplier declarations obtained, the water and land assessment, the travel record, and any change in applicable law. Findings and actions are recorded in FX-REC-001 and retained for at least seven years.

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

12 Approval

This policy is adopted on behalf of Foxtrot LLC and takes effect on the date shown on the cover of this document.

DocuSigned by:

4620BECE0E724B4...

FARSHAD MOHAMMADI, MANAGING MEMBER

15 September 2026

DATE

Revision history

VERSION	DATE	SUMMARY OF CHANGE	APPROVED BY
1.0	15 September 2026	First issue. Consolidates the environmental commitments previously stated only within FX-POL-001 and FX-POL-003.	Farshad Mohammadi, Managing Member

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