

CORPORATE GOVERNANCE

Occupational Health & Safety Policy

Safety arrangements, responsibilities, hazard controls, incident reporting and performance metrics for field and office work.

VERSION 1.0 · EFFECTIVE 15 SEPTEMBER 2026

DOCUMENT CONTROL

DOCUMENT	Occupational Health & Safety Policy
DOCUMENT REFERENCE	FX-POL-007
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, and after any recordable incident
APPLIES TO	The Managing Member, all employees, and all contractors, subcontractors and personnel performing work for Foxtrot LLC
RELATED DOCUMENTS	FX-POL-001, FX-POL-003, FX-POL-005, FX-POL-006, FX-POL-009
CONTACT	compliance@foxtrotllc.com
CLASSIFICATION	Public. Provided to clients, suppliers, regulators and supplier registration portals

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1 Purpose and policy statement

Foxtrot LLC will not trade safety for a deadline, a fee, or a client preference. This policy sets out how that commitment is delivered for work that is carried out almost entirely on other organizations' sites: hangars, ramps, maintenance facilities, storage areas, and aircraft in various states of disassembly.

The company complies with applicable occupational health and safety law in every jurisdiction where it works, including the United States Occupational Safety and Health Act and its standards, applicable Canadian federal and provincial occupational health and safety legislation, and the equivalent law of any other country where work is performed.

CERTIFICATION STATUS

Foxtrot LLC does not hold ISO 45001 or any other third-party certified occupational health and safety management system, and does not claim one. This policy, together with the arrangements described in it, is the company's own safety management arrangement, proportionate to its size and activity.

2 Scope

This policy applies to the Managing Member, to employees, and to contractors, subcontractors and individual personnel performing work for Foxtrot LLC, wherever that work is carried out. It covers field work at aviation facilities, travel to and from those facilities, and office and remote work.

Suppliers and subcontractors carry equivalent obligations under FX-POL-005 Sections 20 and 26.

3 Responsibilities

The Managing Member is accountable for health and safety, and in particular for:

- assessing the hazards of an engagement before it is accepted and before anyone mobilises;
- confirming that personnel hold the competence, training and equipment for the tasks assigned;
- obtaining the host facility's safety rules and making sure they reach the people working under them;
- planning scope, travel and duration so the work can be done without fatigue-driven shortcuts;
- investigating every incident and near miss, and acting on what it shows;
- reviewing performance annually and recording the result.

Everyone performing work for the company is responsible for following site rules and the requirements of this policy, using the equipment provided, reporting hazards, incidents and near misses honestly, and stopping work that cannot be done safely.

4 Principal hazards and controls

The hazards below are the ones that actually arise in this company's work. Each engagement is assessed against them before mobilisation.

HAZARD	CONTROL
Ramp and hangar movement: aircraft, tugs, vehicles, jet blast, propellers and rotors	Host site induction and escort, high-visibility clothing, designated walkways, no lone working in active movement areas
Working at height: stands, docking, wing surfaces, access platforms	Use host-provided compliant access equipment only, three points of contact, no improvised access, fall protection where the site requires it
Confined and restricted spaces: fuel tanks, bilges, cargo bays, wheel wells	Entry only under the host organization's permit and attendant arrangements, never as an unaccompanied visitor
Hazardous substances: fuel, oils, hydraulic fluid, solvents, sealants, composites, cadmium and chromate coatings	Host site chemical controls and safety data sheets, gloves and eye protection, no decanting, no dry sanding or cutting of composites by our personnel
Dangerous goods in transit: batteries, oxygen assemblies, chemicals, aerosols	Only trained personnel prepare, declare or package consignments, under IATA and ICAO requirements
Energised systems and stored energy: electrical power, hydraulics, pressurised lines, deployable devices	Work only after the host organization's isolation and safety precautions are in place and verified
Noise and hearing	Hearing protection in engine run, ground test and ramp environments as required by the site
Manual handling of components, tooling and records boxes	Mechanical aids where available, team lifts, no single-person lift beyond safe limits
Fatigue: night shifts, AOG response, long-haul travel, back-to-back engagements	Duration and rest planned into the engagement, aviation duty and rest limitations respected where they apply, right and obligation to stand down
Travel and driving: unfamiliar roads, night driving, airside driving	Rest before driving, no airside driving without the required permit, taxis or transfers instead of self-drive after long flights
Lone working: records reviews and inspections at remote or out-of-hours facilities	Check-in arrangement agreed before mobilisation, site contact identified, phone charged and reachable
Heat, cold and weather: outdoor inspections, desert and winter operations	Work and rest cycles, hydration, shelter, suspension of outdoor work in lightning, high wind or extreme temperature

5 Stop-work authority

STOP-WORK AUTHORITY

Anyone performing work for Foxtrot LLC has the authority, and the obligation, to stop work and escalate when they believe continuing would be unsafe or non-compliant. No one will be penalized, removed from an engagement, or paid less for doing so. If a client, lessor, broker or facility presses for the work to continue, the Managing Member takes the matter up with them, not with the person who stopped.

6 Host facility rules and interface

Because we are usually a visitor, the host organization's arrangements govern the site. Before work starts we obtain and pass on the site induction, the emergency and evacuation arrangements, the permit requirements, the personal protective equipment requirements, and the reporting route for incidents. Where a host facility will not provide them, or where its arrangements are visibly inadequate, work does not start until the matter is resolved with the client.

Where our personnel identify a hazard created by the host organization, we raise it with the site and with the client in writing, and record it.

7 Fitness for duty

No one performs, supervises, or certifies aviation work while impaired by alcohol, drugs, or medication that affects judgment or performance, or while too fatigued to perform safely. Personnel are expected to remove themselves from safety-critical tasks in that condition, and to say so. Doing so carries no consequence. Where an operator or facility applies a drug and alcohol testing program, we comply with it.

8 Training and competence

Before assignment, the company confirms that the person holds the licences, ratings and authorizations the task requires, the current technical training for the aircraft type or task, and current dangerous goods training where the work involves consignments.

Safety briefing is given at onboarding, refreshed at least annually, and given specifically before mobilisation on a higher-hazard engagement. The briefing covers the hazards and controls in Section 4, the stop-work authority, incident reporting, and the grievance channel. Completion is recorded with the date, participant and topics, and retained for at least seven years.

9 Personal protective equipment

The company provides or requires, as a minimum for field work: safety footwear, high-visibility clothing, eye protection, gloves appropriate to the substance handled, and hearing protection. Site-specific equipment is used as the host organization requires. Personal protective equipment is never charged to the worker.

10 Incident reporting and investigation

Incidents, injuries, near misses, dangerous occurrences, and aircraft damage are reported to the Managing Member promptly and honestly, including where the reporter is at fault. Reports are recorded in the incident log with the date, location, engagement, description, immediate action, root cause, and corrective action.

Reporting in good faith carries no penalty. Withholding, delaying, or misrepresenting a report is a disciplinary matter, and for a supplier it is a breach of FX-POL-005.

Every recordable incident triggers a review of this policy and of the engagement assessment that preceded it.

11 Health and safety performance metrics

The company records the following for employees, contractors and subcontractors working on its engagements:

METRIC	BASIS
Fatalities	Count
Recordable injuries	Count, with lost work-day cases, restricted work-day cases and medical treatment cases identified separately
Lost time injuries (LTI)	Count
Near misses and dangerous occurrences	Count
Environmental events, including spills	Count
Total recordable incident rate (TRIR) and lost time injury frequency (LTIF)	Calculated per 200,000 and per 1,000,000 exposure hours respectively once recorded exposure hours make the rate meaningful. Below that threshold the company reports counts and exposure hours rather than a rate, because a single event at low hours produces a figure that misleads

Figures are reviewed annually, recorded in FX-REC-001, and provided to clients and supplier portals on request. At the date of this issue the company has recorded no fatalities, no recordable injuries and no lost time injuries.

12 Health and safety in procurement

Health and safety is assessed before work is awarded to a supplier that will perform physical work on aircraft or at a facility, or that will supply personnel. The arrangements are set out in FX-POL-005 Sections 20 and 26 and include health and safety clauses in the Supplier Code and contract terms, risk assessment before award, written supplier assessment, documentary evidence on request, audit where the engagement warrants it, and support to close an identified gap. Award preference is given to suppliers that demonstrate sound arrangements.

13 Emergency arrangements

Before mobilisation the company identifies, for each engagement, the site emergency and evacuation procedure, the location of first aid and the nearest medical facility, the site emergency number, the client and facility contacts, and an out-of-hours contact for the person travelling. Personnel travelling internationally are given the local emergency number and the insurance and assistance contact.

14 Monitoring and review

The Managing Member reviews health and safety performance at least once a year, and after any recordable incident. The review covers the incident and near miss log, the metrics in Section 11, training completion, engagement assessments, supplier assessments, and any hazard raised by personnel or by a host facility. It records what worked, what did not, and what will change. Findings are recorded in FX-REC-001 and retained for at least seven years.

15 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:

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15 September 2026

FARSHAD MOHAMMADI, MANAGING MEMBER

DATE

Revision history

VERSION	DATE	SUMMARY OF CHANGE	APPROVED BY
1.0	15 September 2026	First issue. Expands the health and safety commitments previously stated within FX-POL-001 Section 16 and FX-POL-003.	Farshad Mohammadi, Managing Member

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