

CORPORATE GOVERNANCE

Diversity, Equal Opportunity & Anti-Harassment Policy

Non-discrimination, equal pay for equal work, accommodation, anti-harassment arrangements and how they are monitored.

VERSION 1.0 · EFFECTIVE 15 SEPTEMBER 2026

DOCUMENT CONTROL

DOCUMENT	Diversity, Equal Opportunity & Anti-Harassment Policy
DOCUMENT REFERENCE	FX-POL-008
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 headcount or applicable law
APPLIES TO	The Managing Member, all employees, all contractors and consultants, and conduct toward client, facility and supplier personnel
RELATED DOCUMENTS	FX-POL-001, FX-POL-003, FX-POL-005, FX-POL-009
CONTACT	compliance@foxtrotllc.com
CLASSIFICATION	Public. Provided to clients, suppliers, regulators and supplier registration portals

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1 Purpose

Aviation technical work has a narrow demographic history. Hangars, ramps and line maintenance environments are heavily male, and women, younger workers, and people working in a second language are often the minority in the room. That is the context this policy is written for. It sets out what Foxtrot LLC commits to, how the commitment is put into practice with a small workforce, and how it is monitored.

2 Scope

This policy applies to the Managing Member, to employees, and to contractors and consultants engaged by the company. It also applies to how anyone working for the company behaves toward client staff, hangar and maintenance personnel, crew, vendors and inspectors. Suppliers carry equivalent obligations under FX-POL-005 Section 19.

3 Non-discrimination

Foxtrot LLC does not discriminate on the basis of race, color, ethnicity, national extraction, social origin, religion or belief, sex, gender identity or expression, sexual orientation, pregnancy or maternity, age, disability, medical condition, marital or family status, political opinion, union membership, veteran status, or any other characteristic protected by applicable law.

This applies to every employment and engagement decision, including advertising, sourcing, selection, terms offered, pay, task allocation, access to training, promotion, renewal, discipline and termination. Decisions are made on ability, competence, qualifications, authorizations held, and performance.

The company complies with Title VII of the Civil Rights Act, the Age Discrimination in Employment Act, the Americans with Disabilities Act, the Equal Pay Act, the Arizona Civil Rights Act, and the applicable human rights and employment standards legislation of every other jurisdiction where it engages personnel, including Ontario.

4 Equal pay for equal work

The company commits to equal pay for equal work and for work of equal value, and to equal opportunity at every level of the organization.

The process is as follows:

1. Every role and engagement has a documented rate basis set before the person is identified, derived from the scope of work, the authorizations required, and the market rate for that scope, not from what the individual previously earned or first asks for.
2. Salary history is not used to set pay, and is not requested.
3. Rates are checked against the applicable living wage benchmark and legal minimum under FX-POL-003 before an engagement is priced.
4. At the annual review the Managing Member compares the rate paid to every person engaged in the period against the documented rate basis for that scope of work, identifies any unexplained difference, and corrects it rather than justifying it.
5. The check and its outcome are recorded in FX-REC-001.

REPORTING ON PAY, STATED HONESTLY

Foxtrot LLC currently engages too few people for a gender or ethnicity pay gap figure to be either meaningful or anonymous. The company therefore does not publish a pay gap percentage or set numerical representation targets, because a figure derived from a handful of engagements would mislead rather than inform. It publishes the process above instead, and will publish pay gap data once headcount makes a figure statistically meaningful and non-identifying. Where a client or a supplier assessment asks for pay equity evidence before that point, the company provides the documented rate basis and the annual check record.

5 Recruitment and engagement practice

- Role and engagement requirements are written around the competence and authorizations the work actually needs, and do not carry requirements that exclude candidates without a work-related reason.
- Candidates are assessed against the same criteria, and the reason for a selection decision is recorded.
- Where the company engages personnel through an agency or a subcontractor, it requires the same standards under FX-POL-005, including age verification and non-discrimination.
- The company does not ask about, or take into account, family plans, pregnancy, religion, political views or immigration intentions when selecting.

6 Disability, accommodation and accessibility

The company provides reasonable accommodation to enable a qualified person with a disability, a medical condition, a religious observance, or a caring responsibility to do the work, up to the point where an accommodation would be genuinely incompatible with an aviation safety or regulatory requirement. Where that point is reached, the reason is explained in writing rather than left unstated.

Requests are made to the Managing Member, are handled confidentially, and are answered within ten working days. Medical information disclosed in support of a request is kept separately from engagement records, is not shared with clients, and is retained only as long as needed.

Field work at hangars and airports carries physical requirements that are real, but they are stated per task rather than assumed for a whole role, so that work which can be performed remotely or with an accommodation is not closed off unnecessarily.

7 Harassment, bullying and retaliation

Harassment is unwanted conduct related to a protected characteristic, or conduct of a sexual nature, that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment. It is prohibited, whether or not the person responsible intended it, and whether it happens on a site, in a vehicle, in a hotel, in a message, or on a call.

The following are prohibited without exception:

- sexual harassment, including unwanted advances, comments about a person's body, sexual jokes, requests for sexual favors, and unwanted physical contact;
- racial, ethnic, religious, national-origin, gender, disability or age-based slurs, jokes, imagery or nicknames;

- bullying, intimidation, threats, shouting, humiliation in front of others, and deliberate exclusion from information needed to do the work;
- conditioning work, pay, renewal, or a reference on a personal or sexual relationship;
- corporal punishment, physical abuse, and any threat of it;
- retaliation against anyone who raises a concern, refuses to take part, or supports an investigation.

These prohibitions apply equally to conduct toward people who do not work for us: client staff, hangar and MRO personnel, crew, inspectors and vendor staff. Behaviour of this kind on a client's site is treated as a serious matter and is reported to the client where the client's own personnel are involved.

8 Reporting and investigation

Anyone experiencing or witnessing conduct covered by this policy may raise it with the Managing Member at compliance@foxtrotllc.com, anonymously if they prefer, in any language. Where the concern involves the Managing Member, it may be raised with the client's compliance function, with company counsel, or with the relevant labor or human rights authority. Reports are handled under FX-POL-009, which sets out acknowledgment, investigation, timescales, confidentiality and outcome.

Investigation is proportionate, prompt, and impartial. The person raising the concern is told the outcome. Where the concern is substantiated, action may include an apology and corrective steps, changes to task allocation, retraining, removal from an engagement, termination of employment or contract, termination of a supplier relationship, and referral to an authority.

Nobody is required to raise a concern with the person responsible for the conduct first, and nobody is asked to keep an investigation secret from a regulator, authority or lawyer.

9 Training and communication

This policy is given to every employee and contractor at the start of their engagement, and they confirm they have read it. It is covered in the annual briefing under FX-POL-003 Section 11, together with harassment, discrimination, dignity at work, and how to report a concern. Where an engagement places a lone worker in an unfamiliar or higher-risk environment, the briefing covers that specifically before mobilisation. Completion is recorded.

10 Monitoring and review

At least once a year the Managing Member reviews: every engagement decision made in the period against the criteria in Section 5; the equal pay check in Section 4; accommodation requests received and how they were answered; any report raised under this policy and its outcome; and whether the reporting channel is understood and usable by the people who might need it.

The review states what will change. Findings are recorded in FX-REC-001 and retained for at least seven years. This policy is revised where the review, a substantiated report, a change in headcount, or a change in applicable law makes revision necessary.

11 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 commitments previously stated within FX-POL-001 Section 15 and FX-POL-003, and sets out the equal pay and monitoring process.	Farshad Mohammadi, Managing Member

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