

CORPORATE GOVERNANCE

Grievance, Whistleblowing & Remediation Procedure

How anyone can report a concern about Foxtrot LLC or its supply chain, how reports are handled, and how remedy is provided.

VERSION 1.0 · EFFECTIVE 15 SEPTEMBER 2026

DOCUMENT CONTROL

DOCUMENT	Grievance, Whistleblowing & Remediation Procedure
DOCUMENT REFERENCE	FX-POL-009
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, including a review of accessibility and effectiveness
OPEN TO	Anyone, whether or not connected to Foxtrot LLC, including its own personnel, workers in its direct and indirect supply chain, local communities, clients, business partners and any other affected person
RELATED DOCUMENTS	FX-POL-001, FX-POL-002, FX-POL-003, FX-POL-005, FX-POL-007, FX-POL-008
CHANNEL	compliance@foxtrotllc.com
CLASSIFICATION	Public. Published without gating at foxtrotllc.com/policies

Contents

1 Purpose.....	3
2 Who can use this procedure.....	3
3 How to report	3
4 What can be reported	4
5 How a report is handled	5
6 Confidentiality and data handling	5
7 Protection from retaliation	5
8 Remedy and remediation	6
9 Records and retention	6
10 Accessibility, design and effectiveness review	6
11 Approval.....	7
Revision history.....	7

1 Purpose

A commitment that cannot be challenged is not worth much. This procedure sets out how anyone can tell Foxtrot LLC that something is wrong, what happens next, how the person is protected, and how the company puts things right.

It is written to meet the effectiveness criteria for grievance mechanisms in the United Nations Guiding Principles on Business and Human Rights: legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement with the people who use it.

2 Who can use this procedure

The channel is open to anyone, whether or not they have any relationship with the company. That includes:

- the company's own personnel, employees, contractors and consultants;
- personnel of suppliers, subcontractors, agents, brokers and forwarders in the direct supply chain, including their own workers directly rather than only their management;
- workers anywhere in the indirect supply chain;
- local communities affected by the company's operations or by its supply chain;
- clients, business partners, and users of the Synops platform;
- crew, host facility personnel, inspectors and other people encountered during our work;
- anyone else affected, and anyone raising a concern on their behalf, including a trade union, a worker representative, a lawyer, or a non-governmental organization.

3 How to report

GRIEVANCE CHANNEL

Email compliance@foxtrotllc.com

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

Published at foxtrotllc.com/policies. No account, login, portal or form is required.

Reports are accepted in any language, and may be submitted anonymously.

A report does not need to use any particular words, cite a policy, or be complete. It is enough to describe what happened, where, and when, as far as the person knows it. If a report reaches the company by another route, including verbally on a site, through a client, or through a social channel, it is brought into this procedure and recorded in the same way.

IF THE CONCERN INVOLVES THE MANAGING MEMBER

Foxtrot LLC is a single-member company, so the person who reviews reports may be the person a report is about. Where that is the case, the concern can be raised instead with the compliance function of the client for the engagement concerned, with the company's external counsel, with the relevant civil aviation authority, or with the relevant labor, human rights or law enforcement authority. Nothing in this procedure requires a person to raise a concern with the company first, and the company will not treat going directly to an authority as a breach of any duty owed to it.

4 What can be reported

Any conduct connected to the company or its supply chain that may breach our policies, the law, human rights or aviation regulation. It is not limited to a list, but it expressly includes:

- child labour and the employment of young workers in hazardous work;
- forced labour, modern slavery, human trafficking, recruitment fees, retention of identity documents, and restrictions on freedom of movement;
- occupational health and safety, unsafe work, unsafe aircraft condition, and pressure to continue unsafe work;
- interference with freedom of association or collective bargaining;
- discrimination, harassment, bullying, sexual harassment and retaliation;
- wages below the legal minimum, below the prevailing industry wage, or below the applicable living wage benchmark, late or indirect payment, and unlawful deductions;
- excessive working hours, denial of breaks and rest, and workload that cannot be met within duty limits;
- harmful soil change, water or air pollution, harmful noise emission, or excessive water consumption;
- unlawful eviction, unauthorized taking of land, forest or water, and disregard of tenure rights;
- misuse of public or private security forces;
- impairment of a protected legal position;
- mercury under the Minamata Convention, persistent organic pollutants under the Stockholm Convention, and hazardous waste under the Basel Convention;
- bribery, corruption, kickbacks, facilitation payments and falsified records;
- data protection, privacy and information security failures;
- falsification of technical records, suspected unapproved parts, and misuse of the Synops platform.

5 How a report is handled

STEP	TIMESCALE
Receipt is acknowledged, with a case reference and the name of the person handling it. Where the report is anonymous and no reply route exists, receipt is logged instead	Within 5 working days
The facts are discussed with the person who raised the concern, where contact is possible, so that the company understands the concern as they see it rather than as it assumes it to be	Within 10 working days
Immediate protective action is taken where there is a risk to a person, including stopping work, removing someone from an engagement, or notifying an authority	Immediately, ahead of any investigation
The concern is investigated proportionately to its seriousness. This may include reviewing records, speaking to the people involved, requesting evidence from a supplier, visiting a site, or engaging external expertise	Normally within 8 weeks
Findings, the decision, the remedy and any corrective action are communicated to the person who raised the concern, with an explanation where something is not disclosed	Within 2 weeks of conclusion
Corrective action is verified as complete	By the deadline set, and confirmed at the annual review
Where the investigation cannot be concluded within 8 weeks, the person is told why and given a revised date	At 8 weeks

6 Confidentiality and data handling

The identity of a person raising a concern is not disclosed without their consent, other than where disclosure is required by law or by an authority. Where an investigation makes identity effectively apparent, the person is told before the step is taken and their view is taken into account.

Anonymous reports are investigated on their content. Anonymity is not treated as a reason to give a report less weight.

Personal data in a report is handled under FX-POL-011, is kept separately from ordinary engagement records, is shared only with those who need it for the investigation, and is retained under Section 10.

7 Protection from retaliation

NON-RETALIATION

Retaliation against anyone who raises a concern in good faith, refuses to take part in a violation, or assists an investigation is prohibited and is itself a breach of FX-POL-001 and FX-POL-005. Retaliation includes dismissal, non-renewal, removal from an engagement, rate reduction, withdrawal of work, exclusion, threats, and pressure through a third party. For a supplier, retaliating against its own personnel for using this channel is grounds for suspension or termination of the relationship.

A report made in good faith carries no consequence even if it turns out to be mistaken. Only a report known by the person to be false is a disciplinary matter, and the burden of showing that sits with the company, not with the reporter.

Nothing in this procedure limits anyone's right to report to a regulator, authority or law enforcement body, to seek legal advice, to speak to a trade union or worker representative, or to receive a whistleblower award.

8 Remedy and remediation

Where the company has caused or contributed to an adverse impact, it provides for or cooperates in remedy. Remedy is decided with regard to what the affected person needs, not only to what is convenient for the company, and may include:

- ending the practice immediately and confirming that it has ended;
- an apology, and correction of a record or a statement;
- payment of wages, repayment of a recruitment fee, or compensation for loss or injury;
- reinstatement to an engagement, or restoration of work withdrawn;
- medical care, transport home, or immediate practical assistance where a person has been harmed or stranded;
- a change to a process, a contract term, a rate, or a workload arrangement;
- retraining, removal from an engagement, or termination of the person responsible;
- corrective action by a supplier with a deadline and verification, and suspension or termination where the supplier will not remedy a severe violation;
- referral to the relevant authority.

Where the impact arises at a business partner rather than at the company, the company uses its leverage under FX-POL-005 to obtain remedy and escalates as that Code provides. It does not treat the absence of direct legal responsibility as the end of the matter.

9 Records and retention

Every report is recorded in the grievance log with the case reference, the date received, the route, whether anonymous, the subject, the steps taken, the outcome, the remedy, the corrective action and its verification, and the date closed. The log is retained for at least seven years.

A summary of the log, including the number of reports received and their subject matter, is published each year in the human rights due diligence statement, FX-REP-001, in a form that cannot identify the people involved.

10 Accessibility, design and effectiveness review

This channel is designed for the people who might need it, which in our supply chain includes personnel working in a second language, on a night shift, at a facility a long way from the company:

- any language is accepted, and a reply is provided in the language of the report;
- anonymous reporting is available;
- no account, login, portal or technical knowledge is required, and email or post is enough;

- the channel is published openly rather than behind a client or supplier portal;
- suppliers are required by FX-POL-005 Section 28 to make the channel known to their own personnel directly, in a language those personnel understand;
- a report can be made by a representative on someone's behalf;
- no cost falls on the person reporting.

At least once a year the Managing Member reviews whether the channel actually works. The review asks the company's own personnel and its suppliers' personnel whether they know the channel exists, whether they believe using it is safe, and what would make it easier to use, and takes those answers into account when revising this procedure. Where an identified risk affects a community or a group of workers, contact is sought with them or with their legitimate representatives about how they would prefer to raise a concern. The review also considers reports received, time taken at each step, outcomes, and whether remedies held. Findings are recorded in FX-REC-001, and changes to this procedure are made in the next revision rather than deferred.

11 Approval

This procedure 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. Sets out in full the grievance arrangements referred to in FX-POL-003 Section 9 and FX-POL-005 Section 28.	Farshad Mohammadi, Managing Member

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