

SUPPLY CHAIN GOVERNANCE

# Human Rights & Supply Chain Due Diligence Procedure

The method Foxtrot LLC uses to analyse risk, prioritise it, act on it, verify that the action worked, and document all of it.

VERSION 1.0 · EFFECTIVE 15 SEPTEMBER 2026

DOCUMENT CONTROL

|                    |                                                                                                                     |
|--------------------|---------------------------------------------------------------------------------------------------------------------|
| DOCUMENT           | Human Rights & Supply Chain Due Diligence Procedure                                                                 |
| DOCUMENT REFERENCE | FX-POL-010                                                                                                          |
| 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, with the due diligence cycle                                                                                |
| APPLIES TO         | The company's own operations, its direct and indirect supply chain, its services and software, and its project work |
| RELATED DOCUMENTS  | FX-POL-003, FX-POL-005, FX-POL-006, FX-POL-007, FX-POL-008, FX-POL-009, FX-REC-001, FX-REP-001                      |
| CONTACT            | compliance@foxtrotllc.com                                                                                           |
| CLASSIFICATION     | Public. Provided to clients, suppliers, regulators and supplier registration portals                                |

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## 1 Purpose and standard applied

This procedure sets out how Foxtrot LLC performs human rights and environmental due diligence in practice. It exists so that the commitments in FX-POL-003 are executed the same way each year, are evidenced, and can be checked by a client, an auditor or an authority.

The method follows the six-step framework of the OECD Due Diligence Guidance for Responsible Business Conduct and the United Nations Guiding Principles on Business and Human Rights: embed responsible conduct, identify and assess impacts, cease, prevent and mitigate, track implementation and results, communicate, and provide for or cooperate in remedy. It is also written to answer the requirements customers apply under the German Supply Chain Due Diligence Act and comparable supplier assessment frameworks.

### PROPORTIONALITY, STATED PLAINLY

Foxtrot LLC is a micro-enterprise. It does not operate a factory, employ a large workforce, or buy from thousands of vendors. This procedure is therefore designed to be performed properly by one accountable person with documented steps, rather than to imitate the apparatus of a large manufacturer. What it does not do is reduce the standard applied: a low-risk profile is a conclusion reached by analysis and recorded, not an assumption made in advance.

## 2 Scope of the analysis

Each cycle covers four layers:

| LAYER                               | WHAT IS EXAMINED                                                                                                                                                                                                                                                          |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Own operations and locations        | The registered office, remote and office working, and all field work performed by the company's own personnel at client, maintenance and airport facilities, including travel                                                                                             |
| Direct supply chain                 | Every party with a contractual relationship with the company, including subcontracted engineers and inspectors, maintenance organizations, parts vendors, freight forwarders and customs brokers, travel providers, cloud and software vendors, and professional advisers |
| Indirect supply chain               | Suppliers of our suppliers, examined by country and sector screening, by flow-down obligations under FX-POL-005, and whenever substantiated information about a specific risk reaches the company                                                                         |
| Services, software and project work | The technical services supplied to clients, the Synops platform including rectifAI and synConnect, and any project engagement, assessed for impacts on the people affected by them, including the workforces of client operators                                          |

The company holds no majority-owned affiliated companies, has no subsidiaries, and undertakes no investment activity, so those layers are recorded as not applicable rather than left blank.

### 3 Affected groups considered

The analysis considers, for each layer, who could be harmed:

- the company's own personnel, employees and contractors;
- personnel of direct suppliers, including agency and supplied labour;
- workers in the indirect supply chain;
- local communities affected by the company's operations, and by its direct and indirect supply chain;
- clients, business partners and platform users, including the maintenance and engineering workforces whose records our software touches;
- other people present where the work happens, including host facility staff, crew, inspectors and drivers.

Where a group requiring particular attention may be affected, as set out in FX-POL-003, that group is assessed specifically rather than as part of a general workforce.

### 4 Timing and triggers

The full cycle is performed at least once a year, in September, and signed off by the Managing Member.

It is performed again, in whole or in part, when any of the following occurs:

- the company enters a new country or market;
- it engages a new category of supplier, or a supplier in a higher-risk country or sector;
- it takes on a materially different type of work, or a project with a community or land interface;
- it changes a product, a deployment model, or a data processing arrangement;
- a grievance, an incident, a client audit finding, or credible external information indicates a risk anywhere in the supply chain;
- applicable law changes.

### 5 Information sources

The analysis is built from:

- internal data: the engagement register, supplier register, purchase and travel records, incident and near miss log, training records, and the grievance log;
- discussion within the company, at review and after each engagement;
- discussion with business partners, including suppliers, subcontracted personnel, clients and facilities, about conditions on the work;
- documentary research, including supplier policies, codes, certifications, safety statistics and declarations;
- external data and databases, including country and sector risk indices, ILO and OECD material, the United States Department of Labor lists of goods produced by child or forced labour, sanctions, denied party, debarment and adverse media screening, and published living wage benchmarks;
- external expertise, engaged where a question exceeds the company's own competence, for example a country-specific labour law question or a community land matter.

Where a source is used, it is named in the record so that the conclusion can be retraced.

## 6 Scoring and prioritisation

Every identified risk is scored on the criteria below. Scoring is qualitative, on a three-point scale of low, medium and high, and the reasoning is written down rather than reduced to a number alone.

| CRITERION                         | QUESTION ASKED                                                                                       |
|-----------------------------------|------------------------------------------------------------------------------------------------------|
| Severity                          | How serious would the harm to a person be?                                                           |
| Irreversibility                   | Could the harm be put right, or is it permanent?                                                     |
| Scale                             | How many people could be affected?                                                                   |
| Likelihood                        | How probable is it, given the country, sector and the specific arrangement?                          |
| Nature and extent of our activity | How much of this activity do we actually do, and how often?                                          |
| Causal contribution               | Do we cause the harm, contribute to it, or are we only linked to it through a business relationship? |
| Leverage                          | How much influence do we genuinely have over the party responsible?                                  |
| Legal implication                 | What legal exposure arises for the affected person and for the company?                              |

Priority is set by severity and irreversibility first, then by likelihood and scale, then by leverage. A risk that is severe but unlikely is not dismissed because it is unlikely. A risk where we have little leverage is not dropped; it is recorded, and the company looks for collective or contractual routes to influence it.

The record distinguishes impacts the company causes directly from impacts indirectly associated with it, and states which category each risk falls in.

## 7 In-depth examination of high risks

Where a risk is scored high, desk research is not sufficient. The company then:

1. seeks contact with the people who may be affected, or with their legitimate representatives, including a trade union, a worker representative or a local organization;
2. draws on internal expertise, including the Managing Member's aviation operations experience of the country and facility type concerned;
3. engages external human rights, labour law or country expertise where the matter exceeds that expertise;
4. asks the supplier or facility for specific evidence rather than a general assurance;
5. considers whether to proceed at all, and records that decision.

The examination, the sources, the findings and the resulting measures are recorded in FX-REC-001. Where no risk is scored high in a cycle, the record states that expressly and states what would have triggered this section.

## 8 Preventive measures

Measures are selected against the specific risk, assigned to a person with a deadline, and verified. The catalogue below is the standing set; each cycle adds, removes or changes measures according to what the analysis found.

| LAYER                               | STANDING MEASURES                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Own operations                      | Policies issued and acknowledged at onboarding; annual briefing on the full topic list in FX-POL-003 Section 11; pre-mobilisation hazard assessment under FX-POL-007; living wage and rate check before pricing; written terms in a language the person understands; duty and rest planning; grievance channel published                                                                            |
| Direct supply chain                 | Screening before award; FX-POL-005 accepted through the purchase order; signed acknowledgment for higher-risk engagements; written human rights, labour and health and safety assessment for suppliers providing personnel or physical work; evidence requested on age verification, wages, hours, safety and training; audit where warranted; re-screening at renewal and at least every two years |
| Indirect supply chain               | Flow-down obligation in FX-POL-005 Section 24; country and sector screening; OECD minerals due diligence confirmation for parts and materials; action on substantiated information; escalation through the direct supplier                                                                                                                                                                          |
| Services, software and project work | Prohibited uses and human oversight commitments in FX-POL-004; no surveillance or individual performance monitoring capability; data protection and residency controls under FX-POL-011; client documentation support                                                                                                                                                                               |
| Beyond our own reach                | Participation in industry and association initiatives that address a risk the company cannot influence alone, and passing client requirements through the chain                                                                                                                                                                                                                                     |

## 9 Supplier onboarding and monitoring

| STAGE                 | ACTION                                                                                                                                                                                     |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Before award          | Identify the risk category of the engagement; screen the entity, its owners and beneficial owners; check approvals and insurance; confirm the commercial rationale and fee proportionality |
| At award              | Provide FX-POL-005; incorporate it into the purchase order or contract; obtain signed acknowledgment where required; record the supplier in the register with its risk category            |
| During the engagement | Monitor conduct on the work; discuss conditions with the supplier's personnel where they are on site with us; act on any concern raised                                                    |
| At renewal            | Reassess, re-screen higher-risk suppliers, and review any corrective action taken                                                                                                          |
| On a finding          | Raise it, agree corrective action with a deadline, verify completion, and suspend or terminate where a severe violation is not remedied                                                    |

Suppliers that meet the Code and evidence it receive award preference and longer terms, as set out in FX-POL-005 Section 27. This is the company's incentive mechanism, and it is applied at award rather than described in the abstract.

## 10 Tracking effectiveness

The company tracks the following each cycle, and compares against the previous cycle:

- measures assigned, completed, and completed on time;
- supplier acknowledgments obtained as a proportion of engagements requiring them;
- assessments completed for suppliers in scope;
- screening completed before award;
- briefing and training completion;
- reports received through the grievance channel, time to acknowledge, time to close, and whether the remedy held;
- incidents, injuries and near misses;
- living wage and working hour checks performed;
- whether personnel and suppliers' personnel know the grievance channel exists and believe it is safe to use.

Where an indicator shows a measure is not working, the measure is changed and the change is recorded. Repeating an ineffective measure for a second cycle is treated as a finding in its own right.

## 11 Documentation and retention

The cycle produces one internal record, FX-REC-001, containing the scope, sources, risk register with scoring, relevance assessment for each topic, measures matrix, nil returns, checks performed, grievance log summary, effectiveness review and sign-off. Supporting evidence is filed with it.

All of it is retained for at least seven years, together with grievance records, supplier acknowledgments, assessments, screening results, training records and incident records.

## 12 Communication

The company publishes a human rights due diligence statement every year at [foxtrotllc.com/policies](https://foxtrotllc.com/policies), without gating. FX-REP-001 is the current statement. It covers the procedure used, the period, the risks identified, actual impacts and reports received, measures taken and their effect, responsibilities within the company, and priorities for the next period.

FX-REC-001 is internal but is provided to a client, an auditor or an authority on request, redacted only where it would identify a person who raised a concern.

## 13 Roles and annual calendar

The Managing Member performs and signs off every step of this procedure. Until the company appoints a named human rights officer, there is no delegation, and the record states who performed each step so that the absence of separation of duties is visible rather than hidden.

| WHEN       | STEP                                                                                                                     |
|------------|--------------------------------------------------------------------------------------------------------------------------|
| Continuous | Supplier screening before award, pre-mobilisation assessment, grievance handling, incident recording                     |
| On trigger | Partial or full re-analysis under Section 4                                                                              |
| September  | Full risk analysis, scoring and prioritisation; relevance assessment of every topic; in-depth examination where required |
| September  | Effectiveness review of the previous cycle's measures and of the grievance channel                                       |
| September  | Update of measures, policies and the Supplier Code; sign-off of FX-REC-001                                               |
| October    | Publication of FX-REP-001                                                                                                |

## 14 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:  
  
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FARSHAD MOHAMMADI, MANAGING MEMBER

15 September 2026

DATE

## Revision history

| VERSION | DATE              | SUMMARY OF CHANGE                                                                                                                                    | APPROVED BY                           |
|---------|-------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| 1.0     | 15 September 2026 | First issue. Documents the risk analysis, prioritisation, preventive measure, verification and reporting method referred to in FX-POL-003 Section 7. | Farshad Mohammadi,<br>Managing Member |

*Controlled electronically. The authoritative version is the one published at [foxtrotllc.com/policies](https://foxtrotllc.com/policies).*