PUBLIC REPORTING

Human Rights Due Diligence Statement

Annual report for 2026 on the risk analysis performed, the risks identified, the measures taken, the reports received and the priorities for the next period.

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CONTACT	compliance@foxtrotllc.com
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1 About this statement

This is the first annual human rights due diligence statement published by Foxtrot LLC. It reports what the company did in the period to 15 September 2026 to identify, prevent and address adverse human rights and environmental impacts connected to its business, what it found, and what it will do next.

It is published because a commitment nobody can check is not a commitment. It is written to be useful to a client's procurement or sustainability team, to an auditor, and to anyone whose work or community could be affected by ours.

The statement is supported by an internal record, FX-REC-001, which contains the full risk register, scoring, measures and nil returns. That record is provided to clients, auditors and authorities on request.

2 The company and its risk profile

Foxtrot LLC is an Arizona limited liability company providing independent aircraft technical services and aviation software to airlines, lessors, operators and maintenance organizations. Services include pre-purchase inspections, lease return and delivery management, ferry support, records and asset inspection, parts logistics coordination and technical representation. The company also develops and licenses the Synops platform, including rectifAI and synConnect.

The company manufactures nothing, operates no production facility, extracts no raw materials, and holds no land beyond a registered office. It is a micro-enterprise: the Managing Member, plus individual contractors and subcontracted specialists engaged for particular work. Its human rights risk profile is accordingly low in its own operations, and what risk exists is concentrated in two places: the physical safety of people doing field work at facilities the company does not control, and labour conditions in a supply chain that reaches upstream into part manufacture and mineral extraction.

Saying the profile is low is a conclusion from analysis, not a starting assumption. The analysis is summarised below.

3 Policy commitment

The company's commitments are set out in FX-POL-003 Human Rights Policy Statement, published at foxtrotllc.com/policies. It is aligned with the Universal Declaration of Human Rights, the UN Covenants on civil, political, economic, social and cultural rights, the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the ILO core conventions, the OECD Guidelines for Multinational Enterprises, and the UN Global Compact principles. It commits explicitly to the standards owed to groups requiring particular attention, including under CEDAW, the Convention on the Rights of the Child, the Convention on the Rights of Persons with Disabilities, the Migrant Workers Convention and UNDRIP.

During the period the policy framework was extended. The company issued or revised eleven governance documents, including a Supplier Code of Conduct with binding human rights and environmental clauses, an occupational health and safety policy, an equal opportunity and anti-harassment policy, a grievance procedure, a due diligence procedure, and an environmental and responsible sourcing policy.

4 Governance

Foxtrot LLC is a single-member company. The Founder and Managing Member is its highest governance body and holds human rights oversight directly: approving the policy, commissioning and signing off the risk analysis, assigning and funding measures, deciding on remedy, reviewing every report received, and approving this statement. Human rights due diligence objectives are set for that role each period and assessed at the annual review.

The company states plainly that there is no separation of duties at this scale, and that the person who performs the due diligence is the person who approves it. That is why the record is documented in detail, why the grievance channel routes to the client's compliance function, external counsel or an authority where a concern involves the Managing Member, and why the underlying record is made available on request.

5 How the risk analysis was carried out

The analysis followed FX-POL-010, which applies the six-step OECD due diligence framework. It was performed in September 2026 and covers the company's own operations, its direct supply chain, its indirect supply chain by screening, and the services and software it supplies. It considers the company's own personnel, supplier personnel including agency and migrant labour, workers in the indirect supply chain, local communities, clients and platform users, and other people present where the work happens.

Sources included internal engagement, supplier, travel, incident and training records; discussion with subcontracted personnel and with client and facility contacts; documentary research on supplier policies and declarations; external country and sector risk data, including ILO and OECD material and United States Department of Labor child and forced labour lists; sanctions, denied party and adverse media screening; and published living wage benchmarks.

Risks were prioritised by severity, irreversibility, the number of people who could be affected, likelihood, the nature and extent of the company's activity, whether the company causes, contributes to or is merely linked to the impact, the company's leverage, and legal implications. The analysis is repeated annually and additionally on defined triggers, including entry into a new market, a new supplier category, a materially different type of work, or substantiated information about a risk.

6 What the analysis identified

The company identified ten risks. In order of priority:

1. **Injury to own or subcontracted personnel during field work** at hangars, ramps and on aircraft. Severity and irreversibility are both high. The sites are controlled by host organizations, so the company's leverage is partial.
2. **Fatigue and excessive hours** driven by aircraft on ground response, lease return deadlines, night work and long-haul travel. The company both causes and can control this one.
3. **Labour conditions of migrant and agency workers** at third-party maintenance facilities and ground handlers, including recruitment fees, retention of identity documents and restrictions on movement. Higher risk in Gulf Cooperation Council states. The company is linked to this risk, and contributes where it places work.
4. **Solicitation of bribes and facilitation payments** by officials, customs, inspectors or state-owned carrier staff, and the pressure this places on individuals.

5. **Labour conditions, including child and forced labour, in upstream part manufacture and mineral extraction.** Severity, irreversibility and scale are high, and the company's leverage is very low.
6. **Exposure to hazardous substances, dangerous goods and hazardous waste** during inspection and parts handling.
7. **Misuse of personal data**, including crew and engineer data, and misuse of platform data for individual monitoring.
8. **Discrimination or harassment** experienced by, or directed at, personnel on third-party sites, particularly lone workers and people working in a second language.
9. **Pressure on a technical finding**, and the safety consequence for everyone who relies on that finding.
10. **Environmental impact** at facilities, including spills, waste routing, and travel emissions.

No risk was scored high on every criterion. The company recorded no actual adverse human rights impact in the period.

Some topics were assessed and found not relevant, and are recorded as such with the basis: unlawful eviction and the taking of land, forest or water; misuse of private or public security forces; and the production or use of persistent organic pollutants. The company holds no land, engages no security forces and produces no chemicals. It records these as verified nil returns rather than as silence, and re-verifies them each cycle.

7 Measures taken

Against the priorities above, the company:

- assesses the hazards of every engagement before mobilisation, obtains and passes on the host facility's safety rules, provides personal protective equipment at no cost to the worker, and states the stop-work authority in writing;
- plans scope, travel and duration against duty and rest limitations, and requires people to stand down when too fatigued to work safely, with no consequence for doing so;
- issued a Supplier Code of Conduct that makes age verification, the prohibition on recruitment fees, direct and timely wage payment, the prohibition on retaining identity documents or restricting movement, freedom of association, working hours and health and safety contractual requirements rather than expectations, with assessment, evidence and audit rights behind them;
- requires suppliers of parts and materials to confirm due diligence consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas;
- requires suppliers to comply with the Minamata, Stockholm and Basel Conventions in work supplied to the company, and to disclose listed substances;
- applies its anti-bribery policy without commercial override, screens third parties before award, maintains a gifts and hospitality register, and briefs personnel before higher-risk mobilisation;
- commits to pay no person below the applicable living wage benchmark or legal minimum, whichever is higher, checked before an engagement is priced and reviewed annually;
- built its software so that it advises rather than decides, refuses to supply an autonomous airworthiness release, and is neither designed nor licensed for individual performance monitoring or for identifying reporters in a confidential safety reporting system;
- gives award preference, longer terms and further work to suppliers that meet the Code and evidence it, rather than competing away their investment in labour and safety standards.

Every measure has a named owner, a frequency or deadline, and a verification route recorded in FX-REC-001.

8 Grievance mechanism and reports received

Anyone may report a concern about the company or its supply chain, whether or not they are connected to it, by writing to compliance@foxtrotllc.com or to the registered address. Reports are accepted in any language, may be anonymous, and require no account, portal or form. The channel is published openly at foxtrotllc.com/policies. Suppliers are required to make it known to their own personnel directly, in a language those personnel understand.

Handling is set out in FX-POL-009: acknowledgment within five working days, discussion of the facts with the person who raised the concern, immediate protective action where a person is at risk, investigation normally concluded within eight weeks, and the outcome communicated. Retaliation is prohibited and is itself a breach of policy. Nothing requires a person to come to the company first, and going directly to an authority is never treated as a breach of a duty owed to the company.

Reports received in the period: none. The company does not present that as a result. In a first period, a nil return is at least as likely to mean the channel is not yet known to the people who might need it. Making it known, and asking those people whether they believe using it is safe, is a priority for the next period rather than a completed action.

9 Remediation

Where the company causes or contributes to an adverse impact it provides for or cooperates in remedy, proportionate to the harm and decided with regard to what the affected person needs. Remedies include ending the practice, correcting a record, paying wages or repaying a recruitment fee, compensation, reinstatement, medical care or immediate practical assistance, changing a process or contract term, retraining or removal, supplier corrective action with verification, and referral to an authority. No remediation was required in the period.

10 Training

Policies are issued to every employee and contractor at the start of an engagement and acknowledged. Briefing covers child labour and young workers, forced labour and trafficking, occupational health and safety, freedom of association, discrimination and harassment, wages and working hours, land forest and water rights, security forces, protected legal positions, mercury, persistent organic pollutants, hazardous waste, anti-bribery, export controls and data protection. It is given at onboarding, refreshed annually, and given specifically before mobilisation on a higher-risk engagement. Completion is recorded.

11 Effectiveness and what we do not claim

The company checks annually whether its measures work, using the indicators in FX-POL-010: measures completed on time, supplier acknowledgments and assessments obtained, screening completed before award, briefing delivered, grievances received and closed and whether remedies held, incidents and near misses, and living wage and hours checks performed. Where an indicator shows a measure is not working, the measure is changed. Repeating an ineffective measure into a second cycle is treated as a finding in itself.

This period establishes the baseline. Being straightforward about the limits:

- The company holds no SA8000, ISO 14001, ISO 45001 or ISO/IEC 27001 certification, no third-party CSR rating, and no CDP score, and has not completed an external CSR audit. Where it states alignment with a framework, it means alignment, not certification.
- Health and safety performance is reported as counts, not rates. At this exposure level a rate would mislead. There were no fatalities, recordable injuries or lost time injuries in the period.
- The company's leverage over upstream manufacturing and minerals is very low. Contractual declarations are the realistic limit of what it can achieve alone, and it records that as a limitation rather than as a control.
- Supply chain visibility is moderate. Direct suppliers are identified and categorised; visibility below the first tier comes from screening, flow-down obligations and declarations rather than from mapping.

12 Priorities for the next period

1. Obtain Supplier Code acknowledgment from every active supplier and report the coverage as a figure.
2. Complete a written human rights, labour and health and safety assessment for every supplier that provides personnel or performs physical work on aircraft.
3. Confirm that suppliers have made the grievance channel known to their own personnel, and ask those personnel directly.
4. Obtain responsible minerals declarations from parts suppliers and report coverage.
5. Publish a travel emissions estimate covering a full reporting year.
6. Re-verify every nil return and state any change expressly.
7. Decide, and record either way, whether an external CSR assessment adds anything real at this scale.

13 Contact and reporting cycle

Questions about this statement, and reports about the company or its supply chain, go to compliance@foxtrotllc.com or to Foxtrot LLC, 12112 N Rancho Vistoso Blvd, STE 100, Oro Valley, AZ 85755, United States. Anonymous reports are accepted, in any language.

This statement is published annually at foxtrotllc.com/policies, without gating. The next statement is due in September 2027.

14 Approval

This statement is published on behalf of Foxtrot LLC for the 2026 reporting period and is available without gating at foxtrotllc.com/policies.

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Farshad Mohammadi
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FARSHAD MOHAMMADI, FOUNDER AND MANAGING MEMBER

15 September 2026

DATE

Revision history

VERSION	DATE	SUMMARY OF CHANGE	APPROVED BY
2026	15 September 2026	First annual statement.	Founder and Managing Member

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