U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

CERTIFICATE OF WAIVER

ISSUED TO

T1 Energy
Responsible Person: Gan Liu
Waiver Number: 107W-2026-02066

ADDRESS –

1211 E 4th St Suite 120
Austin, TX 78702

This certificate is issued for the operations specifically described hereinafter. No person shall conduct any operation pursuant to the authority of this certificate except in accordance with the provisions contained in this certificate.

OPERATIONS AUTHORIZED

Small unmanned aircraft system (sUAS) operations beyond the visual line of sight of the remote pilot in command (PIC); Acting as a remote pilot in command (PIC) or visual observer (VO) in the operation of more than one small unmanned aircraft (sUA) at the same time; Operating Limitations for Small Unmanned Aircraft — Visibility; Operating Limitations for Small Unmanned Aircraft — Cloud Clearance

LIST OF WAIVED REGULATIONS BY SECTION AND TITLE

14 CFR § 107.31—Visual line of sight aircraft operation
14 CFR § 107.35—Operation of multiple small unmanned aircraft systems
14 CFR § 107.51(c)—Operating limitations for small unmanned aircraft - Visibility
14 CFR § 107.51(d)—Operating limitations for small unmanned aircraft - Cloud Clearance

STANDARD PROVISIONS

1. A copy of the application made for this certificate shall be attached to and become a part hereof.
2. This certificate shall be presented for inspection upon the request of any authorized representative of the Administrator of the Federal Aviation Administration, or of any State or municipal official charged with the duty of enforcing local laws or regulations.
3. The holder of this certificate shall be responsible for the strict observance of the terms and provisions contained herein.
4. This certificate is nontransferable.

NOTE—This certificate constitutes a waiver of those Federal rules or regulations specifically referred to above. It does not constitute a waiver of any State law or local ordinance.

SPECIAL PROVISIONS

Special Provisions Nos. 1 to 30, inclusive, are set forth on the attached pages.

This Certificate of Waiver is effective from November 13, 2026, to November 30, 2030, and is subject to cancellation at any time upon notice by the Administrator or an authorized representative.

BY DIRECTION OF THE ADMINISTRATOR

DEREK W HUFTY

Digitally signed by DEREK W HUFTY
Date: 2026.11.13 14:24:00 -05'00'

Emerging Technologies Division (AFS–700)

SPECIAL PROVISIONS ISSUED TO
T1 Energy

General.

The FAA's Flight Standards Service has reviewed your application to ensure compliance with the requirements of 14 CFR § 107.200 and § 107.205. Pursuant to these authorities, the Administrator finds that the proposed small unmanned aircraft (sUA) operation can be conducted safely under the provisions of this Certificate of Waiver (Waiver) as listed below because you have established adequate mitigations for risks involved with operating your sUA in the manner you described. Adherence to the provisions of this Waiver establishes the required level of safety within the national airspace system.

The Administrator may cancel this Waiver at any time. As a general rule, this Waiver may be canceled when it is no longer required, there is an abuse of its provisions, or when unforeseen safety factors develop. Failure to comply with any provision listed below is a violation of the terms of this Waiver and will serve as justification for cancellation.

List of Regulations Waived by Section and Title. The following regulations are waived:

> 14 CFR § 107.31, Visual line of sight aircraft operation, is waived to allow operation of the small unmanned aircraft (sUA) beyond the direct visual line of sight of the remote pilot in command (PIC);
>
> 14 CFR § 107.35, Operation of multiple small unmanned aircraft systems, is waived to allow a person to act as the remote Pilot in Command (PIC) or visual observer (VO) to operate multiple small UAS simultaneously;
>
> 14 CFR § 107.51(c), Operating limitations for small unmanned aircraft - Visibility, is waived to allow operations when the flight visibility as observed from the location of the control station is less than 3 statute miles;
>
> 14 CFR § 107.51(d), Operating limitations for small unmanned aircraft - Cloud Clearance, is waived to allow sUA operations not meeting the cloud clearance requirements of § 107.51(d).

No part of this waiver will function as an airspace authorization under 14 CFR § 107.41. The FAA's Air Traffic Organization responds directly to requests for such authorizations. The LAANC system may not be used for Airspace Authorizations for Waivered Operations.

Common Special Provisions. The Responsible Person is directly responsible for safety of operations conducted under this Waiver and will ensure the Remote Pilot in Command (remote PIC), manipulator of the controls, and visual observer(s) (VO)[1] comply with all provisions of this Waiver.

1. The Responsible Person listed on the Waiver is responsible to the FAA for the safe conduct of the

[1] Title 14 CFR § 107.3 defines the term "visual observer." Any VO participating in operations conducted under this Waiver must meet the requirements listed in § 107.33 throughout the duration of flight operations.

operations. Prior to conducting operations that are the subject of this Waiver, the Responsible Person:

a. Must ensure the remote PIC, manipulators of the controls, and VO(s) are informed of the terms and provisions of this Waiver and strictly observe the terms and provisions herein;
b. Must ensure the remote PIC, manipulators of the controls, and VO(s) are informed and familiar with part 107 regulations; and
c. Evidence of the above (a and b) must be documented and must be presented for inspection upon request from the Administrator or an authorized representative;

2. This Waiver may not be combined with any other waiver(s), authorization(s), or exemption(s) without specific authorization from the FAA;

3. The FAA has the authority to cancel or delay any or all flight operations if the safety of persons or property on the ground or in the air are in jeopardy or there is a violation of the terms of this Waiver;

4. A copy of this Waiver must be accessible and available to the remote PIC at the ground control station during sUA operations that are the subject of this Waiver;

5. The Responsible Person listed on this Waiver must maintain a current list of pilots by name and remote pilot certificate number used in operations under this Waiver. This list must be presented for inspection upon request from the Administrator or an authorized representative;

6. The Responsible Person listed on this Waiver must maintain a current list of sUA by registration number(s) used in operations under this Waiver. This list must be presented for inspection upon request from the Administrator or an authorized representative;

7. For the purposes of this Waiver, direct participants are the remote PICs, persons manipulating the controls, VOs, and any persons whose involvement is necessary for safety of the sUA operation. All other persons are considered non-participants;

8. If a discrepancy exists between the provisions in this Waiver and the waiver application, the Waiver takes precedence and must be followed;

Waiver Specific Special Provisions

9. Remote ID: The sUA must be a standard remote identification unmanned aircraft listed on the FAA-accepted declaration of compliance list (found here: https://uasdoc.faa.gov/), unless otherwise authorized by the Administrator in writing;

10. The Flight Crew for operations under this Waiver must consist of the personnel specified in the Waiver application and supporting documentation, in the number and crew specialties as specified;

11. The remote PIC (RPIC) must be located within the continental United States;
    a. Performance procedures as stated in the CONOPs;

12. Critical Infrastructure Shielding - for structures as defined in subsection (e) of the Critical Infrastructures Protection Act of 2001 (42 U.S.C. 5195c(e)): The sUA must not exceed:
    a. 200 feet above ground level (AGL); or
    b. 200 feet above the height of any object, obstacle (natural or man-made), within a 200 foot radius of the sUA; not to exceed 400 feet AGL; except
    c. Stated UAS Facility Map Grid Heights take precedence over provisos a. and b. unless otherwise

authorized; and
d. Must remain within the confines of the defined operational area detailed in the Site Selection Performance procedures as stated in the CONOPS;

13. Multiple UAS Operations:
    a. The remote PIC may conduct operations of up to **Four (4)** sUA of the make/model defined in the Waiver application controlled and monitored using the specified Flight Management System, which must ensure adequate health and position monitoring, and control of all sUA so they remain inside the area of operation, as described in the waiver application;
    b. Must be operated at the maximum altitudes specified in these Special Provisions;
    c. The remote PIC must ensure that an individual system failure must not interfere with the operation of any other sUA or cause incidents, accidents, or loss of control involving any other sUA that are subject to this Waiver;
    d. Each sUA must be equipped with an independent Flight Termination System that will allow a safe maneuver for recovery inside the defined operational area if the command and control system fails;
    e. The flight termination and Geo-fencing systems must be verified operational prior to each flight;

14. The remote PIC (RPIC) must ensure:
    a. Prior to conducting operations under this Waiver, the RPIC must perform a documented site survey to:
        1) Identify flight operational area obstacles and boundaries so as to avoid collision with, or damage to property;
        2) Validate C2 signal strength is sufficient for control through the entire route;
        3) Validate suitable launch/recovery site(s); and
        4) Complete and document a Flight Risk Assessment;
    b. Routes are preplanned (using waypoints) prior to flight and aircraft are programmed to automatically follow the route. Manual flights are allowed as necessary;
    c. Geofencing is used to confine the Operational Volume as described in the Waiver application;
    d. Return to Home/Return to Land feature must not allow the sUA to deviate from the defined operational volume;
    e. Launch or recovery areas are pre-designated and monitored to keep any human being who is not directly participating in the operation out of the areas prior to, during, and immediately following flight operations;
    f. Non-participant persons inside the operational area are notified of sUA operations; and
    g. Individuals directly participating in the operation of the sUAS must be easily identifiable visually (e.g., apparel, safety vests);

15. The Responsible Person must ensure:
    a. A copy of the Waiver application and Waiver is available to the remote PIC and all other direct participants prior to and during sUAS operations that are the subject of this Waiver;
    b. A copy of the current operations manual required by this Waiver is available to the remote PIC and all other direct participants prior to and during sUAS operations that are the subject of this Waiver;
    c. All operations conducted under this Waiver follow the procedures outlined in the current operations manual. If a discrepancy exists between the provisions in this Waiver and the procedures outlined in the operations manual, the provisions of this Waiver take precedence and must be followed;
    d. A documented notification from the operator(s) of the sUA to any airport, heliport, known

agricultural aerial application operation or aerial military installation within a 3 mile radius of the operating area; and

e. Each remote PIC who will conduct operations under this Waiver is trained in a manner that addresses the items listed in § 107.49(a) and in a manner that is consistent with how the sUAS will be operated under this Waiver. All training and demonstration for all remote PICs and VO(s) must be documented and made available upon request by the Administrator or an authorized representative. Training operations may only be conducted under the standard requirements of part 107 (without waiver). The training must include:
    1) RPIC's with documented experience operating UAS may receive initial Waiver Operations training under the provisions of this Waiver and/or via simulator.
    2) RPIC's who do not have documented experience operating UAS must receive initial Waiver Operations training under the standard un-waivered requirements of Part 107 followed by training under the provisions of this waiver and/or via simulator.
    3) The training must include:
        i. sUA limitations;
        ii. sUA programming;
        iii. sUA operational procedures;
        iv. Waiver specific operations and procedures. The training program must address each Waivered regulation;
        v. Abnormal procedures;
        vi. Air traffic avoidance procedures;
        vii. Crew Resource Management;
        viii. sUA flight training; and
        ix. Demonstration of sUA ground and flight skills;

16. Operations Manual: The Responsible Person must update or revise the operations manual (aka CONOPs) submitted with the Waiver application for changes in the operation. The Responsible Person must track such revisions and present revised documents to the Administrator or an authorized representative upon request. The Responsible Person must also present revised documents when applying for extension of or amendment to this Waiver. If any revision to the manual would be contrary to the information provided in the waiver application or obviate a condition or limitation of this waiver, then the Responsible Person must apply for an amendment to this Waiver;

17. Operations subject to this waiver must cease as soon as possible in a manner that does not jeopardize the safety of human beings, property or other aircraft, if, at any time:
    a. Safety of human beings or property on the ground or in the air is in jeopardy;
    b. Any failure to comply with the provisions of this Waiver exists;
    c. Full-duplex communications cannot be maintained between the remote PIC and any VO participating in the operation;

18. Lost Link Procedures: If the remote PIC loses command or control link with the sUA, the sUA must follow a predetermined route to immediately reestablish command and control link. If command and control link is not immediately reestablished and the remote PIC no longer has the ability to direct the sUAS to ensure compliance with applicable provisions of part 107, the sUA must follow the loss of command and control procedure as described in the waiver application;

19. Safety Review: Prior to operations under this Waiver the remote PIC must perform a safety review that addresses, at minimum, the following items as applicable:
    a. Designated positions, physical locations, responsibilities, and Crew Resource Management;

b. Planned flight operating area;
c. Designated launch and recovery areas;
d. Verification of geo-fence boundaries;
e. Verification of return home and land flight profile, and course;
f. Procedures for avoidance of other aircraft and obstacles;
g. Procedures for operating under this waiver;
h. Land vehicle speed;
i. Intended flight path;
j. Abnormal procedures; and
k. Emergency procedures;

20. Unmanned Aircraft System:
    a. Operations conducted under this Waiver may only occur with the make and model sUAS described in the waiver application. This includes the Docking Station specified in the CONOPS. Proposed operations of any other manufacturer, make or model of sUAS or Docking Station will require a new waiver application or a request to amend this Waiver; and
    b. The sUA Docking Station must be equipped or provided with sufficient lighting to ensure the ability to determine the satisfactory condition of the sUA prior to flight for all operations and ensure the immediate takeoff and landing area is clear;

21. ADS-B out (1090/978 MHz) may not be transmitted from the sUAS when operating pursuant to this Waiver. An ADS-B in Receiver (other than a cell phone or third party internet services) must be operational and monitored during all operations pursuant to this Waiver;

22. Anti-Collision Lighting: The sUA must be equipped with anti-collision lighting compliant with §107.29 to appropriately increase the conspicuity of the sUA. The anti-collision lighting system must be operational at all times;

23. Ground Control Station, Control and Communications (C2) System:
    a. Telemetry: The sUAS ground control station must display in real-time the sUA altitude, position, direction of flight, ground speed, C2 signal strength, GPS or navigation system signal condition, battery condition, and sUA distance from the control station as described in the Waiver application;
    b. Alerting: The remote PIC must ensure the GCS is configured to audibly and/or visually alert the remote PIC of degraded system performance, geofence loss of containment, loss of Control link with the sUA, and intrusion alerts as described in the Waiver application;
    c. Emergency Profiles: The remote PIC must ensure the GCS is configured for automated emergency actions (e.g. RTL/RTH, altitude descend, position hold etc.) as described in the Waiver application; and
    d. Sensors: the remote PIC must ensure any installed collision/obstacle avoidance sensors are operational;

24. UAS Maintenance: All sUAS operations conducted in accordance with this Waiver must comply with all manufacturer recommendations and limitations for the sUAS:
    a. The Responsible Person must maintain each sUAS and its components in accordance with manufacturer's instructions and recommendations. sUAS maintenance includes scheduled and unscheduled overhaul, repair, inspection, modification, replacement, and system software upgrades of the sUAS and its components necessary for flight;
    b. A log of all maintenance performed must be kept for each aircraft operated under this waiver.

This log must be available to the remote PIC for review prior to conducting operations that are the subject of this waiver. Each sUAS maintenance log must be presented to the Administrator when requested. The log must contain the following information for each maintenance activity:

1) A description (or reference data acceptable to the Administrator) of work performed;
2) The date of completion of the work performed;
3) The name of the person who performed the work; and
4) The signature of the person who performed the work;

c. Any sUA that has undergone maintenance (including firmware or software changes) that may appreciably affect the flight characteristics of the sUA must undergo a functional check flight prior to conducting commercial operations under this Waiver. The functional check flight may be conducted under the provisions of this Waiver in a controlled access area and under the standard provisions of 107.51. A log entry must be made for each functional check flight. The log entry must contain at minimum the:

1) Calendar date;
2) sUA registration number;
3) Remote PIC who performed the functional test flight;
4) Duration of the flight; and
5) The result of the functional flight test;

Operating limitations for small unmanned aircraft - Weather: Cloud Minimums Special Provisions sUAS operations may be conducted in weather conditions with reduced cloud clearance minimums, provided:

25. Operational Parameters: The sUA must not be operated;
    a. To exceed 200 feet above ground level;
    b. Into clouds, and that the ability of remote PIC and VO to maintain visual line of sight of the sUA at all times and is not hampered by clouds;

26. **Reduced Minimum Visibility and Cloud Clearance Requirements:**
    a. During operations conducted under this Waiver the remote PIC will not fly the sUA unless the minimum flight visibility, as observed from the location of the control station or where sUA is positioned for flight, is no less than 1 statute mile; and
    b. Operations into clouds is prohibited. The sUA must remain clear of clouds at all times; and
    c. Night operations are prohibited;

27. When operating within 3 statute miles of any airport, airport management must be notified prior to the sUAS operation, a method of radio or telephone communication with airport management must be established, and the remote PIC or VO must monitor the airport's common traffic advisory frequency;

28. NOTAM: The Responsible Person must file a Notice to Airmen (NOTAM) no more than 72 hours and no less than 24 hours prior to operating under this waiver. A NOTAM can be filed by calling 1-877-487-6867 (1-877-4-US-NTMS). The Responsible Person must verify the NOTAM has been issued prior to conducting waivered operations;

29. All emitters used in sUAS must be compliant with all applicable FCC regulations and provisions of the FCC authorization granted for the emitter. An FCC Experimental authorization may not be used for sUAS operations under this Waiver; and

30. Operations Area: Operations conducted under this Waiver are limited to the location as described in the waiver application.