

APPROVED

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AVIA SOLUTIONS GROUP (ASG) PLC No *ASG-GMO/2023-06-01/10*

AVIA SOLUTIONS GROUP (ASG) PLC

AVIATION SAFETY POLICY

CONTENT

1. INTRODUCTION.....	3
2. DEFINITIONS	3
3. PURPOSE AND SCOPE	7
4. ROLES AND RESPONSIBILITIES	9
5. ASG SAFETY MANAGEMENT SYSTEM	10
6. SAFETY ACCESS	13
7. SAFETY AND COMPLIANCE REPORTING PROCEDURE.....	14
8. CONTRACTING PRINCIPLES	15
9. CHANGE IN THE MANAGEMENT POSITION	16
10. COMPANY INTEGRATION.....	17
11. DISCIPLINARY COMMISSION.....	17
12. EMERGENCY RESPONSE PLAN	17
13. DOCUMENTATION AND RECORDS.....	18
14. GENERAL	18

1. INTRODUCTION

Safety holds the key to Group’s future and affects all its activities. Avia Solutions Group management is committed to the aviation Safety management system and will give leadership to the program and demonstrate through everyday actions, the commitment to Safety and its priority in the achievements of the Group’s Safety objectives. The processes in place in the SMS include the active involvement of all managers and supervisors, who, through planning and review, will continue to promote efforts for continued improvement in Safety and Safety performance within the Group.

The term “Safety Management” is comprehended as Safety, security, health, environmental and compliance management. The key focus is the safe operations of an airworthy aircraft.

Promulgation of its contents to third parties without authorization is prohibited.

2. DEFINITIONS

Definition	Explanation
Acceptable Level of Safety Performance (ALOSP)	The minimum level of Safety performance of civil aviation in a State, as defined in its State Safety programme, or of a service provider, as defined in its Safety management system, expressed in terms of Safety performance Targets and Safety performance indicators.
Accident	An Occurrence associated with the operation of an Aircraft which, in the case of a manned aircraft, takes place between the time any person boards the Aircraft with the intention of flight until such time as all such persons have disembarked, or in the case of an unmanned aircraft, takes place between the time the Aircraft is ready to move with the purpose of flight until such time as it comes to rest at the end of the flight and the primary propulsion system is shut down, in which: <ol style="list-style-type: none"> 1. A person is fatally or seriously injured as a result of: <ul style="list-style-type: none"> – Being in the aircraft; or – Direct contact with any part of the aircraft, including parts which have become detached from the aircraft; or <ul style="list-style-type: none"> – Direct exposure to jet blast, except when the injuries are from natural causes, self-inflicted or inflicted by other persons, or when the injuries are to stowaways hiding outside the areas normally available to the passengers and crew; or 2. The Aircraft sustains damage or structural failure which: <ul style="list-style-type: none"> – Adversely affects the structural strength, performance or flight characteristics of the aircraft, and would normally require major repair or replacement of the affected component, except for engine failure or damage, when the damage is limited to a single engine, (including its cowlings or accessories), to propellers, wing tips, antennas, probes, vanes, tires, brakes, wheels, fairings, panels, landing gear doors, windscreens, the Aircraft skin (such as small dents or puncture holes) or minor damages to main rotor blades, tail rotorblades, landing gear, and those resulting from hail or bird strike, (including holes in the radome); or 3. The Aircraft is missing or is completely inaccessible.
Accountable Manager / ACM	The person acceptable to the National Authority who has corporate authority for ensuring that all operations and maintenance activities can

	be financed and carried out to the standard required by the Authority, and any additional requirements defined by the Subsidiary.
Aircraft	A machine that can derive support in the atmosphere from the reactions of the air other than the reactions of the air against the earth's surface.
ALARP – 'As Low As Reasonably Practicable'	ALARP is a logic that regulators and businesses can sometimes apply to judging the adequacy of Risk controls. In many cases, the business can refer to existing good practice. Sometimes this has happened in concert with stakeholders in the industry to achieve a consensus about what controls achieve ALARP for a particular Risk. However, for high potential Risks, especially if these coincide with complex or novel situations, good practice has to be supplemented with other methods such as cost benefit analysis.
Audit	A systematic, independent, and documented process for obtaining evidence and evaluating it objectively to determine the extent to which requirements are complied with.
Aviation Safety Manager	Focal point of contact for the Safety management system in ASG.
Avia Solutions Group or ASG	Avia Solutions Group (ASG) PLC, a company incorporated under the laws of Republic of Ireland, registration No. 727348, with its registered office at 20 Kildare Street, Dublin 2, Dublin, Ireland.
Centrik	Web-based management system platform, with Documents, Risk, Safety Reporting, Compliance monitoring and Meeting management modules included.
Contributing Factors	Actions, omissions, events, conditions, or a combination thereof, which, if eliminated, avoided or absent, would have reduced the probability of the Accident or Incident occurring, or mitigated the severity of the consequences of the Accident or Incident. The identification of Contributing Factors does not imply the assignment of fault or the determination of administrative, civil, or criminal liability.
Error	An action or inaction by an operational person that leads to deviations from organizational or the operational person's intentions or expectations.
Group	ASG and its legal entities directly or indirectly controlled by ASG;
Hazard	A condition, object, activity, or event with the potential of causing injuries to personnel, damage to equipment or structures, loss of material, or reduction of the ability to perform a prescribed function.
High-consequence Indicators	Safety performance indicators pertaining to the monitoring and measurement of high consequence Occurrences, such as Accidents or Serious Incidents. High-consequence indicators are sometimes referred to as reactive indicators.
ICAO	International Civil Aviation Organization.
Incident	An Occurrence, other than an Accident, associated with the operation of an Aircraft which affects or could affect the Safety of operation.
Inspection	An independent documented conformity evaluation by observation and judgment accompanied as appropriate by measurement, testing or gauging, in order to verify compliance with applicable requirements (incl. procedures, work instruction standards, etc.).
Investigation	A process conducted for the purpose of Accident prevention which includes the gathering and analysis of information, the drawing of conclusions, including the determination of causes and/or Contributing Factors and, when appropriate, the making of Safety Recommendations.
Just Culture	A culture in which front-line Operators or other persons are not punished for actions, omissions or decisions taken by them that are commensurate

	with their experience and training, but in which gross negligence, wilful violations and destructive acts are not tolerated.
Likelihood	In the ICAO Doc 9859 AN/474 Safety Management Manual, Fourth Edition, Safety Risk probability is defined as the likelihood or frequency that a Safety consequence or outcome might occur.
Management of Change	Documented process to identify external and internal changes that may have an adverse (or positive) effect on Safety. This process uses the existing Hazard identification, Risk assessment and mitigation processes.
May	To be allowed or permitted to: Used to express possibility or probability.
Mitigation Barrier	Risk control mitigating the outcome (severity) of an Incident or of an Accident.
Occurrence	Any Safety-related event which endangers or which, if not corrected or addressed, could endanger an aircraft, its occupants or any other person and includes in particular an Accident or Serious Incident.
Operator	A person, organization or enterprise engaged in or offering to engage in an Aircraft operation.
Policy	Aviation Safety Policy
Reporter	A natural person who reports an Occurrence or other Safety-related information pursuant to this Regulation.
Risk	The combination of Occurrence likelihood and severity.
Risk Analysis, Assessment and Mitigation	A Risk management process ensures analysis (in terms of Likelihood and severity of Occurrence), assessment (in terms of tolerability) and control (in terms of mitigation) of Risks to an acceptable level.
Safety	The state in which the possibility of harm to persons or of property damage is reduced to, and maintained at or below, an acceptable level through a continuing process of Hazard identification and Risk management
Safety Investigation	A process conducted by a Safety Investigation authority for the purpose of Accident and Incident prevention which includes the gathering and analysis of information, the drawing of conclusions, including the determination of cause(s) and/or Contributing Factors and, when appropriate, the making of Safety Recommendations.
Safety Management System (SMS)	A systematic approach to managing aviation Safety including the necessary Organisational structures, accountabilities, policies, and procedures, and includes any management system that, independently or integrated with other management systems of the Organisation, addresses the management of Safety.
Safety Manager	Focal point of contact for the Safety management system in the Subsidiary. The position may be combined with Compliance Manager role within the Subsidiary.
Safety Performance	Safety achievement as defined by the Safety performance Targets and measured by Safety performance indicators.
Safety Performance Indicator (SPI)	A data-based Safety parameter used for monitoring and assessing performance.
Safety Performance Monitoring	The process by which the Operator's Safety performance is monitored and assessed against the Operator's Safety policy and Safety objectives.
Safety Performance Objective (SPO) or Target (SPT)	The planned or intended objective for Safety performance indicator(s) over a given period. Objectives and Targets are considered synonymous in this policy.

Safety Recommendation	A proposal of a Safety Investigation authority, based on information derived from a Safety Investigation or other sources such as Safety studies, made with the intention of preventing Accidents and Incidents.
Serious Incident	An Incident involving circumstances indicating that there was a high probability of an Accident and associated with the operation of an Aircraft which, in the case of a manned aircraft, takes place between the time any person boards the Aircraft with the intention of flight until such time as all such persons have disembarked, or in the case of an unmanned aircraft, takes place between the time the Aircraft is ready to move with the purpose of flight until such time as it comes to rest at the end of the flight and the primary propulsion system is shut down.
Subsidiary or Company	Any form of legal entity, formed and established under Avia Solutions Group corporate structure, related entities and any of its direct or indirect subsidiaries, regardless of the controlling stake in the shareholding.
Undesirable Operational State (UOS)	The stage in an Accident scenario where the scenario has escalated so far that the Accident can be avoided only through successful recovery measure(s) or by chance.

3. PURPOSE AND SCOPE

The purpose of the Policy is to set out the key aspects of the Group's SMS framework with the intention to maintain operations of the Group at the acceptable level of Safety.

The Group consists of different airlines, maintenance repair organizations, ground handling service providers and aviation training academies across the world. The regulations applicable to each Group Subsidiary may differ locally, however it is expected that they comply with ICAO Annex 19 requirements. Operational control that the Subsidiaries exercise through a structure is detailed in different variations depending on the interpretations and local requirements. ASG seeks to have a monitoring function on the local structure, its aviation Safety and Compliance performance as well as its evolution and continuous improvement.

3.1. Safety and Compliance Statement

"Avia Solutions Group believes that Safety and Compliance are fundamental to our business.

This leads to our commitment to develop, implement, maintain, and constantly improve processes to ensure that all our activities take place through a balanced allocation of resources, aimed at achieving the highest level of Safety performance possible. All staff are accountable and responsible for safety. Responsibility for Safety performance and making our operations safer lies with each of us – from managers to front-line employees. Each employee is required to comply with all Company procedures and standards and perform his/her duties in a way that promotes Safety. Safety is a primary responsibility for each manager who is responsible for implementing and maintaining Safety Management System practices in his or her area of responsibility and will be held accountable to ensure that all reasonable steps are taken to improve Safety.

Avia Solutions Group is fully committed to the Corporate Safety Program. Its primary objective is the proactive identification of Safety Hazards and systematic management of their associated Risks, with the intent to eliminate their potential for affecting all areas of our operations, for injury to people and damage to equipment or the environment. To that end, we will continuously examine our operations for Safety Hazards, address Safety Risks as a priority and find the ways to minimise them. To achieve this staff are required to use an internal safety reporting system to raise any concerns relating to the Safety of Aircraft operation, ground handling, crew training and/or airworthiness activities.

Our Commitment is to:

- *No fatal Accidents.*
- *Ensure Safety of our employees, passengers, clients, and contractors.*
- *Establish and implement a Hazard identification and Risk management processes to pro-actively eliminate or mitigate Risks to a level that is as low as reasonably practicable.*
- *Support and promote the reporting of identified Risks, Hazards, errors, and events, which may compromise the Safety of our operations.*
- *Where reports are submitted in confidence, all practical steps will be taken to safeguard the source of the report.*
- *Promote sharing of the Safety critical information with the Board of Directors of ASG to ensure our operations at the acceptable level of Safety.*
- *Support the proactive and systematic management of Safety and Compliance through the provision of appropriate human and financial resources that will result in an organisational culture that fosters safe and high-quality practices, and actively manages Safety and Compliance with the same attention to results as our financial management.*
- *Apply an open-door policy that encourages effective communication and a "Just Culture" principles, when staff are not punished for actions, omissions or decisions taken by them which are commensurate*

with their experience and training, but where reckless conduct, wilful violations and destructive acts are not acceptable.

- *Apply human factor principles in all activities.*
- *Continually monitor the workload of the key Safety persons throughout the Company.*
- *Ensure that all staff cooperates with Safety and compliance monitoring Audits and Investigations, when required.*
- *Emphasise a value based corporate culture, which results in a stable and honest working environment for all employees.*
- *Enforce the management and training of Safety and Compliance as one of the primary responsibilities of all managers.*
- *Clearly define responsibilities to all our staff for the delivery of Safety and Compliance performance.*
- *Comply with, and wherever possible exceed, national and international regulatory requirements, standards, and best practices.*
- *Ensure that all relevant staff are provided with adequate and appropriate aviation Safety information and training, are competent in Safety and compliance matters and are only allocated to tasks commensurate with their skills and qualification.*
- *Establish and measure Safety and Compliance performance against realistic objectives and/or Targets.*
- *Continually improve our Safety and Compliance performance and conduct management reviews to ensure relevant Safety and Compliance actions are taken and are effective.*
- *Check that externally supplied systems and services to support our business meet our Safety and Compliance performance standards.*
- *Take all possible steps to ensure the Health, Safety and Welfare of all employees, visitors and contractors engaged in work for the Company.*
- *We aim to remain an industry leader in safe, competent, and efficient provision of corporate aviation services. “*

4. ROLES AND RESPONSIBILITIES

4.1. Aviation Safety Committee

Aviation Safety Committee reports directly to the Board of Directors of ASG.

Aviation Safety Committee's responsibilities include:

- formulation and implementation of the Policy;
- reviewing and assessing of the Safety objectives and evaluation of their implementation by the Subsidiaries;
- consolidating of Hazards, Risks, Incidents and Accidents registry establishing Group-level database;
- constant monitoring of aviation Safety Risk trends within the Group and the aviation industry overall and provision of recommendations and guidance to the Subsidiaries as appropriate;
- establishing recommendations arising from review of Group-level Safety register;
- identifying of what additional resources are required to meet Policy goals and implement agreed actions which enhance Safety.

4.2. ASG's Aviation Safety Manager

The ASG's Aviation Safety Manager is responsible for the supervision and facilitation of the processes to support the Accountable Manager, Safety and Compliance Manager of aviation related Subsidiaries, in developing processes and procedures to ensure their activities in a safest manner possible.

ASG's Aviation Safety Manager functions, duties and responsibilities include, but are not limited to:

- development and implementation of the Policy;
- constant monitoring of the Group's overall aviation Safety and Compliance performance against the Policy;
- proposing of the annual aviation Safety goals to the Board of Directors of ASG (including specific Safety Performance Indicators);
- monitoring and assisting ASG management as necessary in creating within the Group the single level of Safety culture that achieves the highest possible industry performance standards;
- monitoring the effective integration of Aviation Risk Management into ASG's and its Subsidiaries activities;
- monitoring the Safety Investigation of the aviation Occurrences involving Group's assets and observed Hazards related to aviation activities;
- management of ASG Subsidiaries Incidents and Accidents central registry;
- issuing recommendations arising from Group Incidents and Accidents registry;
- identifying, analysing, and monitoring trends that may affect the Safety of Group;
- reviewing and assessing of the Safety level established by the Group and evaluation of its implementation and performance by the Subsidiaries;
- reviewing of reports, assessments, notifications, or any other formal documents received from the Subsidiaries, aviation regulators and / or other authorities that may have a material effect on flight Safety operations;

- identifying of what additional resources are required within the Group to implement agreed actions which enhance Safety;
- drafting Safety bulletins, newsletters, and consolidated Safety reports;
- promotes aviation Safety awareness and Just Culture principles within the Group;
- considering any other matters affecting aviation Safety within the Group.

5. ASG SAFETY MANAGEMENT SYSTEM

5.1. Safety Objectives

Avia Solutions Group Safety objectives are defined and approved by the Aviation Safety Committee.

The implementation of Safety improvements to reach and maintain these objects is the condition for operating at an Acceptable Level of Safety Performance.

The Aviation Safety Committee and the Board of Directors of ASG periodically reviews the Safety performance of the aviation related Subsidiaries to ensure a continuous improvement of the Group Safety.

5.2. Safety Performance Indicators and Targets

Safety performance Indicators (**SPIs**) are a measure used to express the Level of Safety Performance achieved. They are generally expressed in terms of the frequency of an event or Occurrence, e.g., number of unstable approaches per 100 flights, Aircraft departures or man hours.

Safety Performance is reviewed during meeting of Board of Directors of ASG to ensure that the operations are performed as expected.

The Aviation Safety Manager can identify the Safety concerns and Hazards by monitoring the operations.

Most of the time, the Safety Performance Indicators are the Safety data from the tools which have allowed the identification of the Safety concern:

- Events of Flight Data Monitoring;
- Occurrences or deficiencies provided by the reporting system;
- Findings identified by Audits or Inspections.

Safety Performance Indicators are approved separately from this Policy by Aviation Safety Committee and distributed to the Subsidiaries for quick access. The results of these indicators shall be available to ASG's Aviation Safety Manager on request or shall be transmitted to ASG's Aviation Safety Manager if deemed to have actual or potential negative Safety effects.

5.3. Safety report management

All Safety reports are collected, distributed, and managed by ASG's Aviation Safety Manager. All reports received to the safey@aviasg.com mailbox are registered and kept by ASG's Aviation Safety Manager.

ASG's Aviation Safety Manager may contact the Subsidiary to make sure it is aware of the nature and circumstances of the Occurrence/Hazard reported and/or to obtain the necessary additional information and clarification. When required by the Aviation Safety Committee, ASG's Aviation Safety Manager may participate in the Investigation for the monitoring and overview purposes.

When the Investigation together with corrective/ mitigating / preventive actions has been completed and the summary of the Investigation has been sent to ASG by Safety Manager of the Subsidiary, Safety report will be closed in the Group register.

Members of the Aviation Safety Committee may request to perform more in-depth Investigation, provide additional evidence of the corrective/preventive measures and/or recommend additional corrective/preventive measures. Request should be agreed upon all members of the Aviation Safety Committee.

Safety reports registered in the reporting system database are periodically reviewed and analysed by Aviation Safety Committee in order to identify trends, Safety Risks and Hazards as well as to monitor if implemented corrective actions were effective in reduction of Safety Risk.

5.4. Safety Risk Management

The Safety Risk Management process starts with the identification of Hazards followed by an assessment of the Risks associated with the Hazards, affecting aviation Safety and security, in the terms of probability and severity of the defined consequences. The objective is to quantify Risks, determine the acceptability and develop appropriate and effective measures where necessary to eliminate Hazards or mitigate Risks. Once the level of Risk is identified, suitable mitigation measures will be implemented to reduce the Risk to As Low As Reasonably Practicable (ALARP).

The Subsidiaries have the responsibility to make decisions regarding Risk tolerability with respect to the Safety and/or security of their operations in accordance with their procedures.

When an intolerable (high) Risk is identified in the Subsidiary, its Safety Manager should advise ASG's Aviation Safety Manager as soon as possible.

5.5. Levels of Tolerability:

a. HIGH RISK (RED): Intolerable

Risk must be reduced by urgent and efficient mitigation. If not, stopping concerned operations should be considered. In case of an intolerable Risk, the Safety Manager of the Subsidiary has a responsibility to notify ASG as soon as possible together with the Accountable Manager's decision whether he/she accepts the Risk or stops operations.

Aviation Safety Committee may issue a recommendation for additional measures or actions for the identified Risk. The final and ultimate accountability to accept the Risk or to stop operations lays with the Accountable Manager of the affected Subsidiary. Group will continue to monitor the effectiveness of the identified Risk control measures.

b. MODERATE RISK (YELLOW): Tolerable

Operations may continue while being monitored by ASG at the request of Aviation Safety Manager of ASG.

c. LOW RISK (GREEN): Acceptable

Operations may continue without mitigation and escalation to ASG.

Risk assessments resulted in the High-Risk level will be reviewed at Aviation Safety Committee meeting including the review and acceptance of the proposed mitigation actions.

High Risk assessments of the subsidiaries may be re-assessed with accordance to the Group Risk Tolerability and included, if required in the Enterprise Risk Register of the Group.

The overview of the Group High Risk operations will be presented during the Board of Directors meeting.

Risk assessments resulted in the moderate Risk level will be monitored by ASG's Aviation Safety Manager at least once a year and used for the trend monitoring purposes.

All identified Hazards as well as Risk mitigation information are kept by ASG's Aviation Safety Manager in the Group Risk register.

6. SAFETY ACCESS

The Group is dedicated to reach the highest level of Safety as the Policy states. The supervision of the Safety and Compliance monitoring departments is conducted by ASG's Aviation Safety Manager and should have as such full disclosure from the Subsidiaries.

The reporting system, be it anonymous, mandatory, or voluntary Occurrence, will be monitored by ASG's Aviation Safety Manager.

6.1. Safety Review Board

ASG's Aviation Safety Manager should be notified and invited for the Safety Review Board or similar mandatory Safety meeting by Safety Manager or Accountable Manager of the Subsidiary. If not present, the minutes of the meeting is expected to be forwarded to ASG's Aviation Safety Manager.

6.2. Safety Management System

As described above, ASG's Aviation Safety Manager may have direct and unrestricted access to the Safety management system of the aviation related Subsidiaries within the Group.

6.3. Flight Data Monitoring

ASG's Aviation Safety Manager should be informed directly on major (High-Risk) issues and/or trends identified by flight data monitoring program.

6.4. Hazard Log / Risk Register

ASG's Aviation Safety Manager should receive a copy of the latest actual Hazard Log/Risk Register of the aviation related Subsidiary or have access to it through the Safety management software.

6.5. Ad-Hoc audit by the Group

For the purpose of maintaining the continuous monitoring function over the Subsidiaries, ASG may perform an ad-hoc audit or inspection at the Subsidiary.

The Subsidiary is expected to grant access to any facility, aircraft, documents, records, data, procedures or any other material relevant to its activity whether it is contracted or not, to the authorised person by ASG.

7. SAFETY AND COMPLIANCE REPORTING PROCEDURE

7.1. Safety reporting procedure

Safety Manager or his dedicated person (according to the local procedures) is expected to notify ASG's Aviation Safety Manager of the events as defined by ICAO Annex 13 or other Safety events, as indicated below:

- Accidents (fatal and non-fatal);
- Serious Incidents;
- Company High-Risk events;
- Any other events, related to possible public/media interest.

Reports should be submitted to ASG's Aviation Safety Manager via email safety@aviasg.com. Email can be submitted directly through Safety management software.

It is recommended, that all notifications are forwarded as soon as possible, but not later than 72 hours following the event.

Follow-up and closure of reports should be submitted following the same procedure, as described above.

ASG's Aviation Safety Manager remains the right to closely monitor Safety Investigation, when needed.

7.2. Compliance reporting procedure

ASG is required to be informed about identified compliance issues, if any. It is important to have an in-depth view of the compliance matters to understand the degree of the required ASG's involvement in the matter.

National Authority Audit/Inspection

Compliance Manager should provide a copy of the Audit plan for the following year, if it is received from National Authorities.

In addition, Compliance Manager could share the Audit report following the Audit conducted in the compliance and Safety management areas.

In case of the finding has been raised as Level 1, the immediate notification is expected to be made to ASG's Aviation Safety Manager by email safety@aviasg.com

Internal Compliance Reporting

The local compliance department is expected to report any finding that has not been closed with the timeframe allocated. The finding can be internal or external source.

The report, when possible, could contain an explanation by the compliance manager on the issue preventing the closure of the finding and what corrective actions are planned.

A report is also expected to be made in case of multiple substantial findings that would result in Level 1 finding if found by the authority.

Full access of the compliance management system shall be granted to the ASG's Aviation Safety Manager.

SAFA/SACA/SANA Inspection

The local compliance department should provide quarterly the SAFA ratio statement to ASG's Safety Manager, when required. Level 3 findings raised during SAFA/SACA/SANA Inspection is expected to be forwarded to ASG's Safety Manager by email safety@aviasg.com.

8. CONTRACTING PRINCIPLES

8.1. Safety and Compliance management software

All Group Subsidiaries are expected to use software solution for their Safety and Compliance management system.

It is accepted that subsidiary may choose the software independently. However, it is advised to use ASG's preferred and recommended software, where possible.

When software is chosen independently, it should meet the minimum requirements to ensure effectiveness of safety and compliance management functions in the Company:

- Possibility to submit safety report by any staff member
- Possibility to submit confidential/anonymous safety reports
- Possibility to process safety reports within the software
- Possibility to conduct a safety risk assessment within the software
- Possibility to keep a register of identified hazards and/or risks
- Possibility to perform audits using the software
- Possibility to process the raised non-conformities within the software.

8.2. Flight Data Monitoring (AOC only)

Every Airline within the Group (AOC holder) is expected to use a dedicated software solution for Flight Data Monitoring program. It is accepted that the Subsidiary may choose the software independently.

8.3. Emergency Response (AOC only)

In addition to the local Emergency Response Plan, each Airline within the Group (AOC holder) is recommended to use Emergency Response service provider to ensure full support coverage during the crisis.

It is accepted that subsidiary may choose the software independently.

9. CHANGE IN THE MANAGEMENT POSITION

9.1. Notification to ASG of the change in position

Information with the change in the Accountable Manager, Compliance Monitoring and Safety Manager positions should be sent to ASG's Aviation Safety Manager by the Subsidiary.

The notification should be done via email with the proposed change, respective CV and the new organigram.

It is expected ASG's Aviation Safety Manager to participate in the recruitment process for the Compliance and/or Safety Manager's position in the Subsidiary to evaluate the professional and personal competencies of the potential candidate.

Once a change has been completed, the subsidiary is required to provide a new organigram of the Company within 14 calendar days of the change together with the contact details of the related person. It is important on the Group level to have the possibility to reach out the right responsible person. The new organigram should be sent to ASG's Aviation Safety Manager.

10. COMPANY INTEGRATION

10.1. New M&A

New acquired Subsidiary will be introduced to this Policy at the earliest convenience.

Safety and compliance management system may be reviewed and evaluated by ASG's Aviation Safety Manager. Recommendations, if any, for system improvements will be escalated to the Aviation Safety Committee and sent to Subsidiary's Accountable Manager and Safety Manager.

Where possible, the change of the software to the Group preferred systems, shall be considered between ASG's Safety Manager and Subsidiary's Safety Manager.

10.2. Start-up

New Subsidiary will be introduced to this Policy at the earliest convenience.

ASG's Aviation Safety Manager may be included from the initial steps in the development of Safety and compliance management system within the Subsidiary.

Subsidiary will be provided with the list of possible Group service providers, according to the scope of Subsidiary. Subsidiary is advised to choose the provider from the Group list.

ASG's Aviation Safety Manager will closely monitor the development of the management system for the first 2 years of operations.

11. DISCIPLINARY COMMISSION

11.1. Investigation process

In the event when a disciplinary commission shall be created to face certain issues, ASG can support the Subsidiary, upon request, with impartial but knowledgeable assessors.

This service shall also be provided if the targeted individual has a management function, is a responsible manager or objects to participate due to personal issue or where impartiality is difficult to maintain.

12. EMERGENCY RESPONSE PLAN

12.1. ASG integration

The Subsidiary is required to include ASG dedicated persons in the Company's Emergency Response Plan. ASG dedicated persons will not hold any role in the Subsidiary's crisis management plan, but they should be informed without delay whenever Company's Emergency Response Plan is activated.

Following the Emergency Response Plan's activation at the Subsidiary, Crisis Communication plan will be activated at The Group level for follow up and actions, if required.

12.2. Exercise

ASG persons, who are included in the Subsidiary's Emergency Response Plan, will participate in the Emergency Response Plan's activation exercises, drills, etc. Subsidiary is expected to ensure ASG is notified of such an activity and invitations are sent as applicable.

13. DOCUMENTATION AND RECORDS

13.1. Documentation

ASG and the Subsidiaries retain records concerning the counterparties and other information relevant for this Policy, including documentation, related to the management of aviation Safety Risks.

All records shall comply with relevant data retention, data privacy and data protection laws and regulations. If there are on-going checks, reviews, audits, investigations, litigation, or other pursuits the records and other supporting documentation should be kept until the end of these procedures.

The Subsidiaries within the Group should make available upon request any information requested by ASG to verify consideration to the relevant guidelines and recommendations under this Policy or in the context of checks, reviews, Audits, or investigations.

14. GENERAL

This Policy supersedes all Aviation Safety policies and may be amended from time to time as deemed necessary to reflect changes in best Safety practice.

This Policy may not be shared with any third party and should be kept strictly confidential to the Group.

The Policy shall not impose exact and precise requirements for Safety processes carried out at each Subsidiary and shall not establish detailed and comprehensive processes, and these shall be set up internally by each Subsidiary so that the goals of the Policy would be duly met.

ASG's Aviation Safety Manager or other person appointed by the CEO of ASG (if any) shall be responsible for monitoring the performance and implementation of this Policy within the daily business operations and activities of ASG and the Group overall.

The Aviation Safety Committee shall periodically and at least once a year review the Policy and may initiate amendments thereto in order to assure it to be in line with ASG's and the Group's strategy, objectives and values. The initiated amendments to the Policy shall be consistent with the other policies and procedures effective in ASG and the Group overall.

For the purpose of proper implementation and execution of the Policy, the Aviation Safety Committee, the CEO of ASG (or any other person delegated by the CEO of ASG) may draft and develop the documents and/or other materials clarifying the proper implementation and performance of the Policy within ASG or the Group (as the case may be), including, but not limited to, any training material, summaries, etc.

A failure to perform this Policy or its improper performance shall be considered as a serious violation of official duties, and, therefore, may impose negative legal consequences.

All employees of ASG shall be familiarized with this Policy and amendments thereto (if any) in IT-based electronic documents management system used to draft and maintain ASG's electronic documents. If ASG does not have such system installed (or if it is impossible to familiarize the persons with the Policy in such system for any reasons), said persons shall be familiarized with the Policy and subsequent amendments thereto (if any) by signing.

The Policy shall be deemed valid as of its approval by the CEO of ASG.

