



OMM - Issue 2, Revision 02

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Abbreviations, Terms and Definitions

Abbreviations

A

ACM	Accountable Manager
ACARS	Aircraft communication addressing and reporting system
ACSP	Air carrier security program
AD	Airworthiness directive
ADREP	ICAO accident data reporting system
ALARP	As low as reasonable practicable
AltMoC	Alternative means of compliance
AMC	Acceptable means of compliance
AOC	Air operator certificate
ARA	Authority requirements for aircrew
ARO	Authority requirements for air operations
ATO	Approved training organisation
ATPL(A)	Airline transport pilot licence (aeroplane)
AVSEC	Aviation security

C

CAMO	Continuing airworthiness management organisation
CAP	Corrective action plan
CARA	Common airline risk assessment
CAT	Commercial air transport
CBP	Customs and border protection (USA)
CC	Cabin crew
CDL	Configuration Deviation List
CEO	Chief executive officer
CFI	Chief flight instructor (ATO)
CHFR	Confidential human factor report

CI	Continuous improvement
CM	Compliance monitoring
CERM	Crisis emergency response manual (same as ERP - emergency response planning)
CMM	Compliance monitoring manager
CMP	Compliance monitoring program
CMS	Compliance monitoring system
CoE	Centre of excellence
COO	Chief operating officer
CR	Change request in Yonder
CS	Certification specifications
CSPM	Cabin Safety Procedures Manual
CTKI	Chief theoretical knowledge instructor

D

DG	Dangerous goods
DHS	Department of homeland security (USA)
DLH	Deutsche Lufthansa
DAQCP	De-icing/anti-icing quality control pool

E

EASA	European aviation safety agency
EC	European commission
EDP	Electronic Data Processing
EDW	Edelweiss Air AG
EFB	Electronic flight bag
ECCAIRS	European co-ordination center for accident and incident reporting systems
ERC	Event risk classification
ERCS	European risk classification system
ERO	Emergency Response Organisation
ESC	Event severity classification

F

FAM	Flight Attendant Manual
FC	Flight crew
FCL	Flight crew licensing
FDM	Flight data monitoring
FedLex	Federal law publication platform (Switzerland)
FOCA	Federal office of civil aviation (Switzerland)
FOSI	Flight ops supplements & information
FRM	Fatigue risk management
FSA	Fly smart with Airbus (performance modules)
FSAG	Fatigue safety action group
FSO	Flight safety officer
FSTD	Flight simulation training device
FTL	Flight and duty time limitation

G

GEN	General
GM	Guidance material
GTC	Group training committee

H

HoT	Head of training (ATO)
HTE	Hazard top event

I

IATA	International air transport association
ICAO	International civil aviation organization
IDQP	IATA drinking water quality pool
IFQP	IATA fuel quality pool
IM	Information module

IOSA	IATA operational safety audit
IQSMS	Integrated quality and safety management system provided by ASQS (advanced safety and quality solutions) Vienna, Austria
IR	Implementing rule
ISARP	IOSA standards and recommended practices
ISM	IOSA standards manual

L

LHG	Lufthansa group
LOPP	List of preferred partners
LRM	Legal requirement monitoring

M

MAG	Mitarbeitergespräch
MCC	Manager Cabin Crew
ME	Management evaluation
MINT	Media interactive software system
MMEL	Master minimum equipment list
MoC	Management of change
MOR	Mandatory occurrence report
MS	Management system
MSBT	Management system basic training
MSCT	Management system continuous training

N

N/A	Not applicable
NASP	National aviation security programme
NP	Nominated person
NPCA	Nominated person continuing airworthiness
NPCT	Nominated person crew training
NPFO	Nominated person flight operations

NPGO Nominated person ground operations

O

OCC Operations Control Centre
OM Operations manual
OMCC Operational manager cabin crew
OMM Organisation Management Manual
ORA Organisation requirements aircrew
ORE Operation risk evaluation
ORO Organisation requirements air operations

P

PM Process Manual
PRA Proposed revision / amendment form

R

RCA Root cause analysis
RGC Recurrent ground course
RU Risk unit
RSS Rich site summary

S

SAG Safety action group
SEC Security
SERP Station emergency response plan
SeMS Security management system
SKPI Safety key performance indicator
SM Safety manager
SMS Safety management system
SOP Standard operating procedure
SPI Safety performance indicator

SPS	Samn-Perelli fatigue scale
SPT	Safte performance target
SRB	Safety review board
STSB	Swiss transportation safety investigation board

T

TCO	Third-country operator
TKI	Theoretical knowledge instructor (ATO)
TRI	Type rating instructor
TSA	Transportation security administration (USA)
TOI	Temporary operational information

V

VOR	Voluntary occurrence report
-----	-----------------------------

W

WBT	Web-based training
WF	Work flow

Terms and Definitions

Edelweiss

For simplicity, the legal term "Edelweiss Air AG" will be abbreviated "Edelweiss" or "EDW" throughout the entire documentation system.

Ambiguous Terms

In order to determine the meaning of a wording that could be ambiguous, the following explanations are given:

- "Shall, must, has to, is to", and verbs used in present indicative form such as "does, perform", etc., are used in an imperative, compulsory, mandatory sense.
- "Should" is used in a sense of strong recommendation.
- "May, might" are used in a permissive sense to state the authority or permission to do the mentioned act.
- "Must not, may not or no crew member may" mean that nobody is authorized or permitted to do the act.

- “Includes” means “includes but is not limited to”.

Compliance vs Conformance

The use of the terms “compliance” and “conformance” is defined as follows:

- compliance is related to laws (EASA: requirements = hard law, AMC's = soft law, but in fact hard law without an AltMoC), regulations and internal standards
- conformance is related to industry standards (i.e. IOSA)

Language

- Edelweiss manuals and documents are written in English (based on UK standard) and/or German language.
- The pronoun 'he' shall read "he" / "she" and is used throughout the manual irrespective of the gender for ease of reading.

0 Administration and Control

0.1 Signatures

The OMM revision process is controlled and managed by workflows in Yonder, which eliminates the need for physical signatures. The document owner gives his approval during the revision process directly in the Yonder webclient.

Refer to [OMM System of Amendment and Revision](#).

0.2 Competent Authority Approval of the OMM

 Schweizerische Eidgenossenschaft Confédération suisse Confederazione Svizzera Confederaziun svizra Swiss Confederation	Federal Department of the Environment, Transport, Energy and Communications DETEC Federal Office of Civil Aviation FOCA Safety Division - Flight Operations Section Operations of complex airplanes																				
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0.3 List of Changes

Title	Type	CR Label	Change Reason
Abbreviations	Change d	CR-OMM-114 35	Editorial change - Abbreviations amended

Title	Type	CR Label	Change Reason
1.2.1 Safety and Security Policy	Changed	CR-OMM-11455	Safety & Security Policy updated
2.1.1 Manual Library	Changed	CR-OMM-9814	OM A Appendix added
2.1.1 Manual Library	Changed	CR-OMM-9706	Fatigue Risk Management Manual added
2.7 Control of External Documentation	Title Changed	CR-OMM-11108	Editorial change - Title changed
2.7 Control of External Documentation	Changed	CR-OMM-11110	Chapter amended and restructured New and amended subchapters: 2.7 Control of External Documentation 2.7.1 Involved Parties and Responsibilities 2.7.2 Identification of Legal Requirements and Standards 2.7.3 Processing, Implementation and Supervision of Legal Requirements and Standards
2.7.1 Involved Parties and Responsibilities	Title Changed	CR-OMM-11111	Editorial change - Title changed
2.7.1 Involved Parties and Responsibilities	Changed	CR-OMM-11112	Chapter amended and restructured
2.7.2 Identification of Legal Requirements and Standards	New	CR-OMM-11118	New subchapter to 2.7
2.7.3 Processing, Implementation and Supervision of Legal Requirements and Standards	New	CR-OMM-11120	New subchapter to 2.7

Title	Type	CR Label	Change Reason
3.1.2 Accountable Manager Organisation	Changed	CR-OMM-10864	Organisation chart amended
3.1.2.7 Edelweiss High Reliability Management (OS)	Changed	CR-OMM-10865	Organisation chart amended
3.2 Key Management Personnel of the Operations Division - Functions, Names and Contacts	Changed	CR-OMM-11393	Safety Manager changed
3.3.1.2 Duties and Responsibilities	Changed	CR-OMM-9419	Meeting frequency of ME and SRB amended
3.3.2.2 Duties and Responsibilities	Changed	CR-OMM-10877	Editorial change - Format adjusted
3.3.3 Safety Manager	Changed	CR-OMM-11298	Editorial change - Format adjusted
4.3.4.2 Probability (Likelihood)	Changed	CR-OMM-10710	Probability Classification table amended
4.7.4 Safety Performance Targets (SPT)	Changed	CR-OMM-9421	Editorial change - Reference amended
4.9 Change Management	Changed	CR-OMM-11406	Editorial change - Reference amended
4.11.2 Timing	Changed	CR-OMM-9422	Mentioning and linked meeting timing of ME removed
4.12.1 Stakeholders	Changed	CR-OMM-11139	Deputy Safety Manager iso Safety Manager Deputy Security Manager iso Security Manager Risk Controller OSY added

Title	Type	CR Label	Change Reason
4.13.1 Scope and Implementation of FRM	Changed	CR-OMM-9707	Fatigue Risk Management Manual added
4.13.7.1 Stakeholders	Changed	CR-OMM-11407	Editorial change - Typo corrected
5.1.6 Findings, Organisational Awareness and Feedback	Changed	CR-OMM-9423	Recipients of audit reports amended
5.2.3 Subcontractor and Supplier Monitoring	Changed	CR-OMM-11200	Aviation security audit interval added
5.2.3.1 Ground Operations and Cargo Audit Plan	Changed	CR-OMM-11201	Reason for audit extensions clarified
5.2.3.2 Line Maintenance Audit Plan	Changed	CR-OMM-11202	Reason for audit extensions clarified
5.2.3.3 Security Audit Plan	Changed	CR-OMM-11203	Reason for audit extensions clarified
5.3.8.1 Scope of Department Inspection - Compliance and Conformance Supervision	Title Changed	CR-OMM-11081	Editorial change - Title changed
5.3.8.2 Frequency of Department Inspection - Compliance and Conformance Supervision	Title Changed	CR-OMM-11082	Editorial change - Title changed
5.4.2.1 Responsibility	Changed	CR-OMM-9683	Audits shall align with auditor's job description
5.4.3 Auditor Qualification Requirements	Changed	CR-OMM-11084	Auditor qualification requirements amended
5.5.2 Process Evaluation of Corrective Actions	Changed	CR-OMM-11088	Editorial change - Typo corrected

Title	Type	CR Label	Change Reason
5.5.2 Process Evaluation of Corrective Actions	Change d	CR-OMM-9382	Auditors' competencies clarified (final note)
5.5.2.1 Findings Raised by an External Audit Organisation	Change d	CR-OMM-9449	Positions of 1-Risk Assessment and 2-RCA swapped
5.6 Classification of Findings	Change d	CR-OMM-11086	Actions triggered by an observation amended
5.6.1 IOSA Classification of Findings	Change d	CR-OMM-11087	Risk assessment for IOSA Level 2 finding added
7.3 Management Evaluation (ME)	Change d	CR-OMM-9420	Meeting frequency of ME and reference amended
7.5 Leadership Principles	Change d	CR-OMM-11012	Basis of goals/performance evaluation clarified
8.3.1 Handling of Safety and Security Reports (Processing of Reports)	Change d	CR-OMM-11446	Occurrence report is sent to aerodrome if relevant
10.1 Management System Basic Training	Change d	CR-OMM-9720	SM iso NPCT is responsible for MSBT
10.2 Management System Advanced Training	Change d	CR-OMM-9721	Editorial change - Reference amended
13.1.6 OS	Change d	CR-OMM-9895	DOC 3 added and table sorting adjusted
13.1.9 OT	Change d	CR-OMM-9137	EBT Guide for Management added
13.4.11 T	Change d	CR-OMM-8979	Reference to T meeting overview in CAME added

Title	Type	CR Label	Change Reason
2.7.1.1 Identification of Legal Requirements and Standards	Re-moved	CR-OMM-111 15	Obsolete
OMM	Re-moved	CR-OMM-114 04	Obsolete
2.7.1.2 Monitoring and Review	Re-moved	CR-OMM-111 16	Obsolete

0.4 Copyright and Confidentiality

Copyright

The OMM is the property of Edelweiss. No part of it, electronic formats included, may be reproduced without the written permission of Edelweiss.

Confidentiality and Discrepancy of the Content

The content of Edelweiss manuals by their very nature in describing policies and procedures are confidential and shall be treated accordingly.

Suggestions and contributions toward the improvement of manuals and documents are welcome. Any discrepancies found shall be reported by means of an IQSMS report or directly via a change request (CR) in Yonder.

0.5 User Instruction

All personnel shall only use manuals and documents issued/promulgated by Edelweiss. A fully digital publication process ensures that only updated manuals and documents are available and permitted for operational use. Outdated and/or printed manuals invalid are either to be disposed of or marked as "uncontrolled".

0.6 Compliance with Operational Instructions

A manual is a binding document! All Edelweiss employees including subcontracted personnel at any outstation shall be familiar and strictly adhere to the procedures and processes defined in the management system documentation. If any instructions (or parts thereof) seem unclear, employees are to seek clarification from their superior(s).

0.7 Distribution List

The present Manual shall be made available through Yonder to:

- CEO
- ACM
- FOCA
- All personnel within the Operations Division
- Any contractor as required.

1 Organisation and Scope of Activity

1.1 Introduction

Edelweiss has established an integrated management system in order to ensure a single, comprehensive, and harmonised management of all the activities of the organisation, as defined in [OMM Scope of Activity](#).

This manual contains the comprehensive description of the objectives, philosophy, policies, processes, and responsibilities of the integrated management system and it has been prepared in accordance with the applicable regulations, relevant standards and requirements, as defined in [OMM Applicable Regulations, Relevant Standards and Requirements](#).

The content of this manual is applicable to all personnel involved in the Operations Division of the company. The personnel to whom the manual is made available shall make themselves familiar with its contents and comply with it, as defined in [OMM Compliance with Operational Instructions](#).

1.2 Management System Policies

1.2.1 Safety and Security Policy

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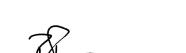
Edelweiss Safety & Security Policy

Edelweiss supports the practice of "mission is the focus and safety is the attitude" during decision making.

The success of Edelweiss depends on a safe and reliable flight operation. All employees, particularly the executive management, aim for the highest achievable level of safety while balancing the resources between production and protection. The Safety & Security Policy is entirely applicable for all integrated suborganisations inside Edelweiss and their management (Approved Training Organisation [ATO] and Continuous Airworthiness Maintenance Organisation [Part-CAMO]).

This policy's relevance is periodically reviewed and continually promoted by the Edelweiss management and considers the Lufthansa Group Safety Policy. The executive management in particular commits to:

1. Support and promote an effective safety & security culture and the provision of sufficient human and financial resources for the successful implementation of the policy.
2. Support an effective reporting culture in order to learn from mistakes, to identify hazards and to collect safety relevant information, as stated in the Edelweiss just culture policy.
3. Use the risk management processes and hazard identification for informed managerial decision making.
4. Develop, implement, maintain and constantly improve safety & security standards, strategies objectives and processes in cooperation with the Lufthansa Group.
5. Develop and continuously improves its Management Systems (SMS / SeMS / CMS) and to measure the safety & security performance as part of the proactive and systematic management process. Further to continuous improvement of this performance by adjusting safety & security objectives, acceptable levels and targets.
6. Apply Human Factor principles.
7. Support a Fatigue Risk Management (FRM) which is not a self-referenced system within Edelweiss but an integral part of the SMS and where the Fatigue Safety Action Group (FSAG) is part of the Safety Action Group (SAG).
8. Comply with legislative and regulatory requirements, as well as national, international and internal standards while considering best practices. Where judged as necessary, aim for exceedance of any compliance.
9. Support all personnel in their responsibility to comply with the applicable laws, regulations and procedures in all locations where operations are conducted and to cooperate with the compliance monitoring and internal investigations.
10. Promote safety, security and compliance awareness and provide training in these disciplines to all Edelweiss personnel corresponding to their role and function in the organization.
11. Ensure that externally supplied systems and services delivered supporting the operations meet Edelweiss and Lufthansa Group safety & security performance standards and provide training where necessary.
12. Ensures regular practice exercises of the emergency response plan to achieve continual improvement.



Bernd Bauer
Chief Executive Officer



David Birrer
Chief Operating Officer &
Accountable Manager

Rev. 04

Date of effectiveness: 15.11.2023

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1.3 Safety Culture

Edelweiss promotes an environment where staff and systems work supportively and constructively together in an environment where discovered errors are recognised and

utilised in a positive and constructive way with a no-blame culture. The Safety Culture is based on the following six elements:

- An **Informative** culture, which requires the management of all systems to have a positive knowledge view concerning human, technical, organisational and environmental factors with impact/contribution to the organisation, allowing for errors to occur.
- A **Flexible** culture open for changes based on «learning from experiences» and a solid safety culture with risk based priorities configuring the business in a timely and controlled manner to new challenges, changing conditions, environment and regulations.
- A **Reporting** culture based on an open organisational climate where all involved are encouraged to report all occurrences deviating from known standards and requirements, hazards and errors without any retribution. The willingness to report, the positive attitude of staff towards safety and security reporting as well as visible and dedicated reporting activities are important elements of a healthy safety culture. Safety reports are one of the most important inputs into the Safety Management System (SMS). The SMS requires safety reports to assess the overall risk exposure, to monitor system performance, to set priorities on safety actions and to initiate the lessons learnt process on the individual and the company level.
- A **Learning** culture willing to perform proactive and corrective actions, and take appropriate action and decisions based on conclusions from relevant information. Willing to implement major reforms where deemed necessary.
- An **Authentic** safety culture relies on a high degree of trust and respect between personnel and management and must therefore be created and supported at all managerial levels. The target of such a culture is reached when all stakeholders (employees, contract parties, managers, etc.) are performing their daily business with the necessary “safety attitude”.
- A **Just Culture** is a culture in which front-line operators and others are not punished for actions, omissions or decisions taken by them which commensurate with their experience and training, but where gross negligence, wilful violations and destructive acts are not tolerated as laid out in the Edelweiss [OMM Just Culture Policy](#).

Edelweiss will constantly invest to keep, enhance and promote such safety culture.

1.3.1 Just Culture Policy

Edelweiss promotes a culture in which front line operators and 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.

Errors and Violations

Effective SMS implementation by Edelweiss depends upon a clear, mutual understanding of errors and violations and the differentiation between the two. The difference between errors and violations lies in intent. While an error is unintentional, a violation is either a wilful misconduct, or a deliberate act of omission to deviate from established procedures, protocols, norms or practices.

Errors or violations may result in non-compliance with regulations or approved operating procedures and are likely to increase an operational risk. Edelweiss will consider whether acts of non-compliance are the result of a violation or an inadvertent error when determining if punitive action is appropriate.

Implementation of Just Culture Principles

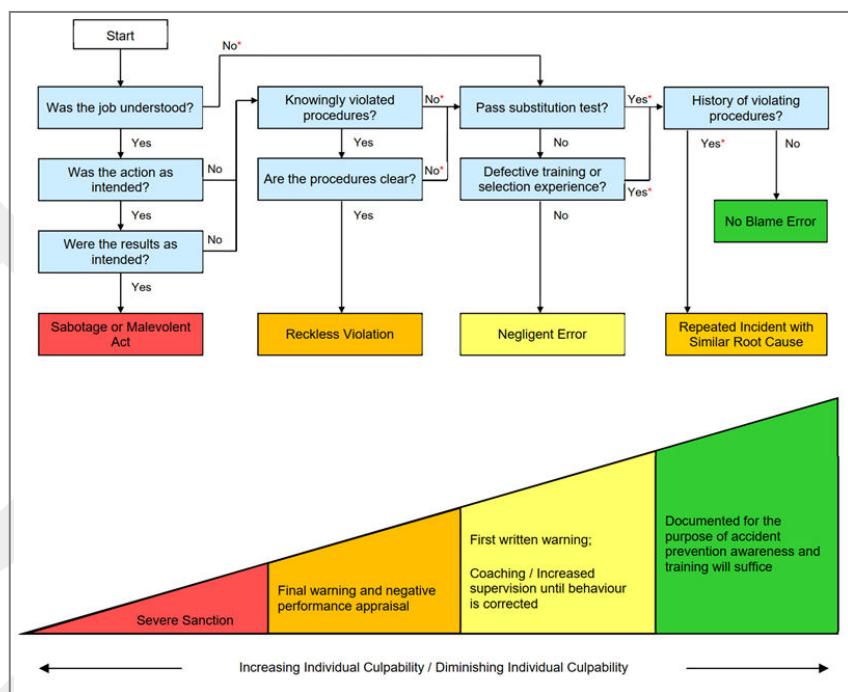
In Edelweiss operations, "just culture" principles are implemented in a system, which is based on a proper assessment of the source of undesired outcomes, errors or violations. It recognizes that, in cases of gross negligence or wilful violation there is a need for disciplinary action. In many other cases, however, where unintentional behaviour is involved, disciplinary action is not appropriate and instead a proper analysis of the outcome should be used for identification of system weaknesses.

Punitive measures taken in response to all acts of non-compliance, without regard to intent, may lead to a reduction in the reporting of errors and finally degrade a positive safety culture.

Edelweiss employees shall be able to distinguish between acceptable and unacceptable behaviour and understand the conditions under which disciplinary action shall not apply.

The following decision tree describes the framework for management decisions when dealing with undesired outcomes in Edelweiss operations.

The below box and question "Pass Substitution Test" requires some further explanation: Would three other individuals with similar experience act in the same manner, in a similar situation and environment as the person being evaluated? If the answer is "Yes", the problem is not the individual, but more likely the environment that would lead most individuals to that action. If the answer is "No", it is more likely that the individual being evaluated is more culpable and accountable.



*) Indicates a "System" induced error. Management personnel must evaluate what part of the system failed and what corrective action and preventive action is required. Corrective and preventative action shall be documented for management review/ evaluation.

Type of Action	Description	Intervention	Dealt with by
Unintended action, unintended consequences	No Blame Error, Repeated Incident with Similar Root Cause, Skill, memory or attention-based errors	Documented for the purpose of accident prevention awareness. Improving performance through training.	Safety Manager or line management
Unintended action, unintended consequences	Negligent Error	Written warning. Manage through improving performance influencing factors (person, task, situation, environment), Coaching, increased supervision until behaviour is corrected	Line management with support of the Safety Manager

Type of Action	Description	Intervention	Dealt with by
Intended action, unintended consequences	Reckless Violation, Rule-breaking (situational, organisational or exceptional optimisation negligent behaviour)	Final warning and negative performance appraisal. Individual follow-up with persons involved	Line management with support of the Safety Manager
Intended action, intended consequences	Sabotage, Malevolent Act, gross negligence, personal optimising	Severe Sanction (disciplinary actions)	Line management with involvement of HR

1.3.2 Fatigue Risk Management Policy



Fatigue Risk Management Policy

To improve flight safety, operational reliability, and the quality of life for our flight and cabin crew members, we have decided to implement a Fatigue Risk Management System (FRMS). This FRMS applies to the whole Edelweiss operation (short-, medium- and long-haul) and to all airborne crew members.

FRMS is a cornerstone in the flight operation as it provides safety and efficiency of our operation whilst also maximizing the well-being of our flight and cabin crews.

Fatigue impact is managed like all other operational risks to safety as documented in the company's Safety Management System concept and principles. Under these concept and principles fatigue mitigation strategies will be regularly reviewed to ensure compliance with safety requirements.

The measures derived from the fatigue mitigation strategies shall be applied by crew schedulers, crew training schedulers, operation control staff, individual crew members and all other persons involved in flight operation.

Nonetheless, as fatigue can never be completely precluded, it is of utmost importance that no airborne crew member reports for duty if not sufficiently free from fatigue in order to operate safely and efficiently under all circumstances.

Therefore, both Edelweiss Air and its airborne crew members have a shared responsibility to avoid fatigue related performance impairment as follows:

The Management of Edelweiss Air is responsible for:

- considering Fatigue Risk Management as one core part of our daily operation.
- providing enough financial resources and administrative personnel to implement the FRMS throughout the company in order to maintain an acceptable level of safety.
- providing flight and cabin crew with a workable roster that strikes a fair balance between the commercial needs and the capacity of individual crew members to work effectively, as well as providing adequate opportunity for recovery between duties.
- creating an environment that promotes open and honest reporting of fatigue related hazards and incidents.
- providing regular fatigue risk management training to flight crew, cabin crew, management, rostering and other FRMS support staff.
- demonstrating active involvement in and understanding of the FRMS.
- ensuring that the fatigue risks within their area(s) of responsibility are managed appropriately and that mitigating actions are taken when the FRM safety assurance process shows that the required safety performance is not maintained.
- employing reactive, proactive and predictive tools and methods, based on scientific knowledge and principles which are part of the Edelweiss Air SMS.
- deciding on the implementation of the FRM measures recommended by the safety bodies and providing the necessary resources to implement these measures.
- demonstrating continuous improvement and providing periodic review of the FRMS to ensure the relevance of the policy and its appropriateness to the size of the operation.



Flight- and Cabin Crews of Edelweiss Air are required to:

- make appropriate use of their rest time to recover.
- actively participate in fatigue risk management education and training.
- report fatigue-related hazards and incidents as described in the OMA and the FRM Guide.
- inform their manager or superior immediately prior to or during work if:
 - they know or suspect that they or other crew members are suffering from unacceptable levels of fatigue.
 - they have any doubt about their or other crew members' capability of accomplishing their duties safely.

Zürich Airport, 03.03.2022



David Birrer

Accountable Manager

1.3.3 Policy Against the Use of Psychoactive Substances

All personnel involved in safety or security sensitive activities shall not be under the influence of psychoactive substances while on duty.

This policy consists of measures to prevent and detect the use of psychoactive substances as well as the associated support processes. Personnel under the influence of psychoactive substances while on duty shall be treated in a just and fair manner. All personnel involved in safety or security sensitive activities shall be informed and trained to ensure a common understanding of this policy.

For self-reporting of problematic use of psychoactive substances by any employee Edelweiss provides assistance through confidential employee counselling. In addition, for flight crew, Edelweiss supports an independent pilot peer support program.

It is the responsibility of each employee to act whenever they suspect a colleague involved in safety or security sensitive activities to be under the influence of psychoactive substances while on duty. In accordance with the four-eyes principle any suspicion shall be verified with a colleague, preferably the direct superior of the suspect, before action is taken as described in [OM A Use of Alcohol and other Psychoactive Substances](#).

The relevant supervisor shall ensure that the suspicion is assessed as soon as possible with a test for psychoactive substances performed by a designated service provider.

Every suspect has the right to demand a second test based on an alternative method. Suspects who refuse to submit to immediate testing for psychoactive substances will be considered to have been under the influence of psychoactive substances while on duty and will remain off duty for further investigation.

Edelweiss acknowledges that there are various reasons for the problematic use of psychoactive substances and supports personnel in overcoming their addiction through voluntary and mutually agreed rehabilitation programs.

Edelweiss ensures that the application of this policy complies with national legislation, data protection requirements and regulatory reporting requirements.

The effectiveness of this policy shall be periodically reviewed in the [Safety Review Board \(SRB\)](#) and amended as deemed necessary.

1.4 Vision, Mission, Values, Strategy and Philosophy

1.4.1 Our Vision

"We are a modern, responsible and internationally successful leisure airline"

Edelweiss is Switzerland's leading leisure travel airline and is based at Zurich Airport. As a sister carrier of Swiss International Air Lines (SWISS) and a member of the Lufthansa Group (LHG), we gear all our actions and activities towards our vision, day after day and in any situation.

1.4.2 Our Mission

“With us, you discover the most beautiful sights of the world”

We fly to over 80 destinations in over 30 countries throughout the world. Whether a beach getaway, a city trip or cultural travel: Edelweiss offers the right destination to make every holiday dream come true.

1.4.3 Our Values

Going on holiday is one of the most exciting and cherished times of the year. We see it as our responsibility to fly our passengers safely and reliably to their respective dream destinations. We pride ourselves on offering Swiss quality that inspires and excites. With a view to ensuring the long-term success of our company, we are continuously expanding our fleet and route network. We are also investing in innovative solutions to make flying even more enjoyable for our passengers and to facilitate the work of our employees.

We live by and apply Swiss values that are globally recognised and appreciated, and we are delighted to represent Switzerland in this way. We cater to the individual needs of our passengers and approach challenges with a professional commitment. Our passengers can rely on us for a relaxing and carefree travel experience to and from their holiday destination, which includes great service on board provided with the warmth and hospitality that Edelweiss is known for.

1.4.4 Our Strategy

Our strategy is the long-term plan for achieving our goals and provides us with the guidelines to be successful in the long term. It consists of several elements and helps us prioritise future initiatives and projects. Our strategy is continuously reviewed and, if necessary, adjusted by analysing the internal and external business environment.

Our strategy includes three main strategic objectives:

- Secure and expand market position in the short- and long-haul leisure segment
- Increase customer satisfaction and loyalty
- Strengthen corporate value within the Lufthansa Group

1.4.5 Our Philosophy

We retain constant awareness of our customers' needs and align our actions to their benefit. We aim for the highest achievable level of safety while balancing the resources between production and protection. We strive to be innovative and best in class in our business area and act in a flexible, agile way to swiftly meet opportunities.

Our daily work is based upon respect and honesty. We take emotional ownership and display leadership in our areas of responsibility. We solicit input and commit to transparency in the decision-making process.

We trust and support each other and have an open-door policy. We believe in giving the power to the people at the sharp end as far as practicable. Therefore, we carefully select and train our staff to high standards so they can apply sound judgement based on professionalism with focus on situational awareness, risk management and economics to achieve our goals. We strive to publish as few rules as possible and only as many as needed. We are a learning organisation and apply just-culture principles.

We communicate the right information to the right person at the right level in a timely, fact-based manner. When distributing information, we strive to structure content as simply/transparently as possible and as explicit as necessary, using clear categorisation and prioritisation principles.

Compliance is a must. Still, we aim for pragmatic implementation, achieved by using sound judgement and decisions based on risk management.

Constant change is a key attribute of our industry. We commit to continuous improvement at the right pace and actively supervise all change processes through risk management. Nevertheless, we also value continuity and we acknowledge social responsibility as a key factor.

We are driven by a pronounced cost sensitivity, with the goal to maintain and improve the cost structure of Edelweiss.

We strive for mindful and responsible use of resources in the context of climate, ecology and the environment.

We treat external stakeholders with professional respect, trust and honesty.

1.5 Scope of Activity

Edelweiss holds the following approvals:

- Air Operator Certificate (AOC), Approval No CH.AOC.1007 issued by the Federal Office for Civil Aviation for Switzerland (FOCA) pursuant to Annex V of Regulation (EU) 2018/1139 and granting privileges to perform commercial air operations as detailed in the A320 and A340 Operations Specifications
- Continuing Airworthiness Management Organisation (CAMO), Approval No CH.CAMO.1007, issued by the Federal Office for Civil Aviation for Switzerland (FOCA) pursuant to Annex Vc (Part-CAMO) to Commission Regulation (EU) No 1321/2014 and granting privileges for airworthiness review and permits to fly for the A320 and A340
- Approved Training Organisation (ATO), Approval No CH.ATO.0193 1007 issued by the Federal Office for Civil Aviation for Switzerland (FOCA) pursuant to Commission Regulation (EU) No 1178/2011 and granting privileges to deliver the training courses listed in the Training Course Approval

- Approval to provide cabin crew initial training and to issue cabin crew attestations, Approval No 02 1007 issued by the Federal Office for Civil Aviation for Switzerland (FOCA) pursuant to Commission Regulation (EU) No 1178/2011.

1.6 Statement of Complexity

Due to the size of the company and the nature and complexity of the activities listed in [OMM Scope of Activity](#), Edelweiss is a complex organisation in accordance with ORO.GEN.200(b).

1.7 Applicable Regulations, Relevant Standards and Requirements

All Edelweiss personnel shall at all times comply with the applicable laws, regulations and procedures in all locations where operations are conducted. In case local regulations are in contradiction with company procedures, local regulations have precedence.

Following tables show an overview of applicable regulations, relevant standards and requirements.

List of regulations and legal requirements¹
Basic Regulation (EC) No 2018/1139
Commission Regulation (EU) No 965/2012, Air operations
Commission Regulation (EU) No 1178/2011, Air crew
Commission Regulation (EC) No 1321/2014, Continuing airworthiness
Regulation (EU) No 996/2010, Investigation and prevention of accidents and incidents in civil aviation
Regulation (EU) No 376/2014, Occurrence reporting
Commission Implementing Regulation (EU) 2015/1018
Regulation (EC) 300/2008, General security aspects in aviation including awareness of the provision
Luftfahrtgesetz der Schweiz; LFG SR 748.0, § 33
Guidelines and directives of the Federal Office of Civil Aviation (FOCA)
ICAO Annexes 6, Operation of aircraft, Part 1 Intl. Commercial Air Transport – Aeroplane
ICAO Annex 19, Safety Management
ICAO Technical Instructions (Dangerous Goods)
ICAO safety management manual Doc 9859
NASP (Swiss National Aviation Security Programme)

List of regulations and legal requirements¹

Foreign Air Carrier Model Security Programm (TSA)

Third Country Operations Specifications (e.g. Part 129 Foreign Air Transport Operator Certification)

Strahlenschutzverordnung StSV 814.501

¹ Including applicable AMCs

List of relevant standards

IATA AHM (Aircraft handling manual)

IOSA Manual (see [OMM External Documents \(incl. GM/AMC, if applicable\)](#))

Swiss World Cargo, Cargo Handling Manual

LHG Safety Management Manual (incl. Safety Standards & References)

Edelweiss' certificates shall remain valid subject to:

- Edelweiss remaining in compliance with the relevant requirements of Regulation (EC) No 2018/1139 and its Implementing Rules, taking into account the provisions related to the handling of findings as specified under ORO.GEN.150/ ORA.GEN.150;
- FOCA being granted access to the organisation as defined in ORO.GEN.140/ ORA.GEN.140 to determine continued compliance with the relevant requirements of Regulation (EC) No 2018/1139 and its Implementing Rules; and
- The certificate not being surrendered or revoked.

Upon revocation or surrender the certificate shall be returned to the competent authority without delay (ref. ORO.GEN.135/ ORA.GEN.135).

Edelweiss has implemented various LH Group guidelines and corporate policies. Most of the guidelines and policies are the Group's original ones, some contain adaptations for the Swiss companies, and some (i.e. Code of Business Conduct and Purchasing Guideline) are adapted guidelines specific to Edelweiss. Guidelines and corporate policies are accessible through COSMOS → WORK → Edelweiss Intern → Konzernrichtlinien.

1.7.1 Exemptions and Derogations

Any exemption or derogation from the Basic Regulation (EU) No. 2018/1139 and its implementing rules requires prior approval by FOCA.

Approved Exemptions and Derogations

Legal reference	Description	Date of approval	Reference
NIL	NIL	NIL	NIL

1.7.2 Alternative Means of Compliance

Instead of Acceptable Means of Compliance (AMC), Alternative Means of Compliance (AltMoC) may be established to ensure compliance with the Implementing Rules, provided the same level of safety is ensured. Edelweiss must not implement Alternative Means of Compliance without having received a formal approval from FOCA.

Approved Alternative Means of Compliance

Legal reference	Description	Date of approval	Reference
NIL	NIL	NIL	NIL

1.8 Compliance Statement



intern

DOC-101

Edelweiss Compliance Statement

The undersigned declares, that

- our organisation's documentation (Management System) has been established and will be maintained in full compliance with the provisions of the legal requirements as stated in OMM Chapter 1.6 «Relevant Standards and Requirements» and that it complies with the terms and conditions of the company's Approval(s), Certificate(s) and other Industry Standards (e.g. IOSA, LH-Group Standard);
- I am responsible for the content of the Management System and confirm, that besides the requirements stated in OMM Chapter 1.6 «Relevant Standards and Requirements» all relevant national and international rules and regulations (e.g. EASA, Swiss Federal Law LFG SR 748) are reflected in the different chapters;
- I am familiar with and understand the content and meaning of the Management System and will perform all duties in full accordance with it;
- the detailed knowledge of the relevant content is mandatory to all personnel concerned and we commit to make sure that they comply with the instructions given in the Management System and;
- I am aware of the fact, that FOCA does not approve/accept the organisation's documentation as such, but only specific elements thereof, as indicated on the respective compliance list. The responsibility for the completeness and the correctness of the organisation's documentation remains therefore solely with the organisation;
- I hold the ultimate responsibility and accountability for the safety and security of the entire operation and;
- I approve and promote safety and security policies throughout the whole organisation.

Zürich Airport, 11.07.2022


David Birrer
Accountable Manager

1.9 Locations, Facilities and Infrastructure

The headquarter of Edelweiss is located in the business complex "The Circle" (Building No. 32 on the 6th floor) directly linked to the airport terminals of Zurich International

Airport and offers a high quality infrastructure. The office floor provides enough working places, meeting and training rooms for the company's daily business.

All working places are equipped with twin desktop screens and high speed internet connections. Wi-fi is available in the entire building for all employees.



The Operations Control Center (OCC) and Crew Control are located on the first floor in Operations Center 1, Zurich Airport.

The offices for the Operational Manager Cabin Crews, the Duty Officer and the briefing rooms for flight/cabin crews are located on the ground floor of Operations Center 1, Zurich Airport.

The Emergency Crisis Room is also located in Operations Center 1, Zurich Airport.

Access to any facility of Edelweiss is electronically restricted to employees only. Visitors will be granted access to these facilities through prior application and registration.

1.9.1 Adresses

Type	Facilities	Location
Headquarter (AOC, Part-CAMO, ATO)	Head office	Edelweiss Air AG The Circle 32 P. O. Box 8058 Zurich Airport Switzerland
Flight Operations	Briefing facilities, crew control, flight	Edelweiss Air AG Operations Centre 1

Type	Facilities	Location
	dispatch, network operations, etc.	8058 Zurich Airport Switzerland
Ground Services	Ground handling at and around the airport	Edelweiss Air AG The Circle 32 P. O. Box 8058 Zurich Airport Switzerland

1.10 Access and Power of the Authority

1.10.1 Competent Authority

FOCA is the competent authority exercising oversight over Edelweiss and its approvals and privileges (ref: ORO.GEN.105).

The competent authority regarding FSTD is defined in [OM D Competent Authority](#).

1.10.2 Power of the Authority

FOCA has the power to:

- interview any nominee or call for additional evidence of his suitability before deciding upon his acceptability
- determine the adequacy, relevance and consistency of the organisation's compliance with the requirements
- assess the efficiency of the organisation's internal monitoring procedures and confirm the availability of sufficient resources and proper processes, as documented by the organisation's Compliance Monitoring System
- verify by means of inspections, compliance with the requirements and the effectiveness of the organisation's Compliance Monitoring System.

1.10.3 Access by the Authority

For the purpose of determining compliance with the relevant requirements of Basic Regulation 2018/1139 and its implementing rules, Edelweiss grants access to any facility, aircraft, document, records, data, procedures or any other material relevant to its activity subject to certification, whether it is contracted or not, to any person authorised by FOCA.

Any person authorised by FOCA is permitted to board and fly in any aircraft operated in accordance with the AOC and ATO at any time and to enter and remain on the flight deck. Any person authorised by the competent civil aviation authority of an EASA member state is permitted to enter the aircraft or FSTD and to perform inspections on its territory.

Note: The responsibility of the commander to make the final decision regarding the admission to the flight deck in flight remains unaffected.

1.10.4 Ad-hoc Authority Audits and Inspections

Flight Inspection

Refer to [OM A Inspections of Flight Operations/Visits to the Flight Deck](#).

Ramp Inspection

The objective of a SAFA/SANA/SACA evaluation is to ensure that the corrective action is taken in order to avert a repetition of the same complaint.

Refer to [FOSI 12 Ramp Inspections](#).

1.10.5 Findings issued by an Authority

Authority findings from audits or inspections are tracked within the audit tool IQSMS.

For further details refer to [OMM Audits performed by an Authority](#).

1.10.6 Disposition imposed by an Authority

1.10.6.1 Immediate Response to Measures imposed to solve a Safety Problem

Edelweiss shall implement:

- any safety measures mandated by an authority; and
- any relevant mandatory safety information issued by EASA, including airworthiness directives.

1.10.6.2 Operational Directives

By means of an Operational Directive, FOCA may prohibit a specific operation, limit it or subject it to certain conditions.

An Operational Directive states:

- the reason for issue
- applicability and duration
- action required by the operator.

Note: Operational Directives are supplementary to the legal provision.

1.10.7 Continued validity of Certificates and Approvals

Certificates issued by FOCA shall remain valid subject to:

- Edelweiss remaining in compliance with the relevant requirements of the Basic Regulation and its Implementing Rules, taking into account the provisions related to the handling of findings as specified in [OMM Audits performed by an Authority](#);
- FOCA being granted access to Edelweiss' organisation as stated in [OMM Access by the Authority](#) to determine continued compliance with the relevant requirements of the Basic Regulation and its Implementing Rules; and
- certificate(s) not being surrendered or revoked.

Upon revocation or surrender, a certificate shall be returned to FOCA without delay.

2 Organisation Documentation, System of Amendment and Revision

All company documentation shall conform to the standard required by the Management System, described in this manual. All manuals listed in [OMM Manual Library](#) form an integral part of Edelweiss management system documentation. They define the lines of responsibility and accountability including organisations key processes.

All manuals must be controlled documents and must be reviewed once a year by the document owner to ensure that the contents have legible and accurate information and in a format appropriate for use.

The document owner shall obtain the necessary acceptance or approval of the relevant Authority when so required.

The document owner is responsible to ensure a continuous legal compliance of the manuals/documents through the revision process.

The document owners ensure, that all concerned personnel, including external service providers are informed of relevant changes in due time and that the documentation is plausible, understandable, valid, readily available and identifiable.

All Edelweiss employees including subcontracted personnel at any outstation shall strictly adhere to the policies, procedures and processes defined in the management system documentation. All operations personnel must be well acquainted with the content pertaining their role within Edelweiss and must make a continuous effort to stay up to date.

The content of Edelweiss manuals is confidential and shall be treated accordingly.

Suggestions and contributions to improve the manuals are always welcome and appreciated. Any discrepancies found as well as suggestions for improvement should be reported immediately by means of an IQSMS report or a Change Request in the Yonder webclient.

Edelweiss documents/manuals apply to all genders, operations personnel, staff, passengers and other persons, although for simplification, references in the company documentation the text are made in the masculine gender only.

General, documents/manuals are written in English and/or German language. Whenever operations personnel are unable to understand parts of the Edelweiss documents pertaining to their duties and responsibilities, translation shall be made available into a language they are able to understand.

Note: The knowledge of the English and German language for operations personnel within Edelweiss is a selection criteria which must be fulfilled for an employment.

2.1 Overview of the Edelweiss' Documentation

Organisation Management Manual (OMM)

The OMM contains a comprehensive description of the objectives, philosophy, policies, processes, and responsibilities of Edelweiss integrated management system.

Operations Manual (OM)

The content of the Operations Manual reflects relevant rules, regulations, requirements, limitations, policies and procedures as well as other information affecting the operation of aircraft under the Edelweiss Air Operator Certificate (AOC), Approved Training Organisation (ATO) and Continuing Airworthiness Maintenance Organisation (CAMO).

2.1.1 Manual Library

Manual	Name of Manual	Manual Owner	Content Responsibility ¹	FOCA Revision Process ²	Format	Access
OM M	Organisation Management Manual	ACM	High Reliability Management (OS)	yes	E D P	Yonder
CER M (ERP)	Crisis Emergency Response Manual (Emergency Response Plan)	ACM	High Reliability Management (OS)	no	E D P	Yonder
FDM	Flight Data Monitoring Manual	Safety Manager	Safety Management (OSF)	no	E D P	Sharepoint (COSMOS)
FRM	Fatigue Risk Management Manual	Safety Manager	Safety Management (OSF)	no	E D P	Sharepoint (COSMOS)
PM	Process Manual	Head of High Reliability Management	Process Owners	yes	E D P	Yonder
OM A	General/Basic	NPFO	Flight Operations Support & Engineering (OCE)	yes	E D P	Yonder

Manual	Name of Manual	Manual Owner	Content Responsibility ¹	FOCA Revision Process ²	Format	Access
	Appendix	NPFO	Flight Operations Support & Engineering (OCE)	no	E D P	Yonder
CSP M	Cabin Safety Procedure Manual	NPFO	Cabin Crew Operations (PCO)	yes	E D P	Yonder
DAM	De-Icing / Anti-Icing Manual	NPFO	Technical Pilot (TO)	no	E D P	Yonder
EFB PPM	Electronic Flight Bag Policy and Procedures Manual	NPFO	Flight Operations Support & Engineering (OCE)	yes	E D P	Yonder
	Appendix	NPFO	Flight Operations Support & Engineering (OCE)	no	E D P	Yonder
FAM	Flight Attendant Manual	NPFO	Cabin Crew Operations (PCO)	no	E D P	Yonder
FOSI	Flight Ops Supplements & Information	NPFO	Flight Operations Support & Engineering (OCE)	no	E D P	Yonder
LSI	Local Station Info	NPGO	Station Management & Performance (OGG)	no	E D P	Yonder
	Dispatch	NPFO	Flight Dispatch (OGD)	no	E D P	Yonder
MCF Manual	Maintenance Check Flight Manual	NPFO	Technical Pilot (TO)	yes	E D P	Yonder
Speech	Speech Booklet	Head of Cabin Crew Operations	Cabin Crew Operations (PCO)	no	E D P	Yonder

Manual	Name of Manual	Manual Owner	Content Responsibility ¹	FOCA Revision Process ²	Form at	Access
book let						
OM B	Aircraft Operating Matters – Type Related A320	NPFO	Flight Operations Support & Engineering (OCE)	yes	E D P	Yonder
	Aircraft Operating Matters – Type Related A340		Flight Operations Support & Engineering (OCE)			
AFM / CDL	Airplane Flight Manual A320	NPFO	Technical Pilot (TO)	no	E D P	FS+ (Master) and Yonder (for info only)
	Airplane Flight Manual A340		Technical Pilot (TO)			
CCO M	Cabin Crew Operating Manual A320	NPCA	Cabin Crew Operations (PCO) Technical Pilot (TO)	no	E D P	Yonder
	Cabin Crew Operating Manual A340		Cabin Crew Operations (PCO) Technical Pilot (TO)			
FCO M	Flight Crew Operating Manual A320	NPFO	Technical Pilot (TO)	yes	E D P	FS+ (Master) and Yonder (for info only)
	Flight Crew Operating Manual A340		Technical Pilot (TO)			
FCT M	Flight Crew Techniques Manual A320	NPFO	Technical Pilot (TO)	yes	E D P	FS+ (Master) and Yonder (for info only)
	Flight Crew Techniques Manual A340		Technical Pilot (TO)			

Manual	Name of Manual	Manual Owner	Content Responsibility ¹	FOCA Revision Process ²	Form at	Access
MEL	Minimum Equipment List A320	NPFO	Technical Pilot (TO) Flight Operations Support & Engineering (OCE)	yes	E D P	FS+ (Master) and Yonder (for info only)
	Minimum Equipment List A340		Technical Pilot (TO) Flight Operations Support & Engineering (OCE)			
QRH	Quick Reference Handbook A320	NPFO	Technical Pilot (TO)	yes	E D P	FS+ eQRH / aircraft ³
	Quick Reference Handbook A340		Technical Pilot (TO)			
OMC	Route Manual	NPFO	Flight Operations Support & Engineering (OCE)	yes	E D P	Yonder
	Appendix		Flight Operations Support & Engineering (OCE)			
OMD	Training Manual	NPCT/ Head of Training	Crew Training (OT)	yes	E D P	Yonder
ACP	Air Carrier Security Programme	Security Manager	Security Management (OSY)	yes	E D P	Yonder
GOM	Ground Operations Manual	NPGO	Ground Operations (OG)	no	E D P	Yonder
GOM	Ground Operations Management Manual	NPGO	Ground Operations (OG)	no	E D P	SharePoint (COSMOS)

Manual	Name of Manual	Manual Owner	Content Responsibility ¹	FOCA Revision Process ²	Format	Access
Crew Control Manual	Crew Control Manual	Head of Crew Planning	Crew Control (OPR)	no	E D P	SharePoint (COSMOS)
CAM-E	Continuing Airworthiness Management Exposition	NPCA	Engineering (TE)	yes	E D P	Yonder
ALP-M	Aircraft Log Procedure Manual	NPCA	Engineering (TE)	yes	E D P	Yonder
LSP-M	Line Station Procedure Manual	Head of Maintenance	Maintenance (TM)	no	E D P	Yonder
MP	Maintenance Program A320	NPCA	Engineering (TE)	yes	E D P	SharePoint (COSMOS)
	Maintenance Program A340	NPCA	Engineering (TE)	yes	E D P	SharePoint (COSMOS)

¹ Editing and publication of yonder manuals is always performed by Flight Operations Support (OCE).

² "yes" means that such manuals/publications shall be submitted to FOCA prior to the effective date in accordance with [OMM Changes requiring Prior Approval](#) (via PRA) or [OMM Changes not requiring Prior Approval](#) (via NMR). Manuals/publications listed as "no" shall never contain elements which require prior approval or a notification to FOCA and therefore are not submitted to FOCA prior to the effective date.

³ Only the following checklists are available as hardcopy on the aircraft: NORMAL CHECKLIST, SMOKE / FUMES / AVNCS SMOKE, REMOVAL OF SMOKE / FUMES, EMER EVAC.

For an overview of other supporting, additional controlled documentation, refer to [OMM List of other Controlled Documentation](#).

2.1.2 Operational Publications

Publica-tion	Content	Responsible	Recipient	FOCA Revision Process ¹	For-mat	Access
Company NOTAM	Infos/Instructions relevant to the flight	OC, OT, TO, OGD	Flight Crew	yes/no ²	EDP	CAE eFM App
FlyPad TOI	Infos/Instructions relevant to the flight	PCO, TO	Cabin Crew	no	EDP	FlyPad App
Memo	Mandatory instructions	OC, OT, TO, PCO	Flight Crew, Cabin Crew, Ground Personnel	yes/no ²	EDP	Yonder
Info	Informational	OC, OT, TO, PCO	various	no	EDP	Yonder
Bulletin	In-depth back-ground information	internal/ external	various	no	EDP	Yonder
Guide	Guiding info	OC, OT, TO, PCO	various	no	EDP	Yonder

¹ "yes" means that such manuals/publications shall be submitted to FOCA prior effective date in accordance with [OMM Changes requiring Prior Approval](#) (via PRA) or [OMM Changes not requiring Prior Approval](#) (via NMR). Manuals/publications listed as "no" shall never contain elements which require prior approval or a notification to FOCA and therefore are not submitted to FOCA prior effective date.

² Depending on the subject addressed.

2.1.2.1 Company NOTAM and TOI

Company NOTAMs are valid for the cockpit crew and are published in the CAE eFM app.

TOIs are published in the Flypad app and are valid for the cabin crew.

Both means of communication contain information which are operationally relevant to the flight.

Company NOTAMs and/or TOIs entries can also be published by the relevant ops personnel for the following purposes:

- urgent revisions

- other operational matters that are time critical.

For urgent revisions refer to [OMM Types of Revisions](#).

2.1.2.2 Memo

Memos contain a mandatory instruction or a directive and have a temporary validity. They can be published for the whole company, for certain departments or functions or solely for one person. Memos either serve:

- to bridge a gap between the instruction or directive becomes effective until the respective manual/document is updated; or
- until the validity of the instruction or directive ends.

It is the responsibility of the author of the memo to update the respective manual and delete the memo thereafter. The memo should indicate which part of the manual system will be revised (if applicable). Operationally relevant memos can be published as "Read and Acknowledge". These memos must be read before the next flight by crew members.

2.1.2.3 Info

An info has a purely informative purpose and is not binding. Information can be published for a department, groups of people or for the entire company.

2.1.2.4 Bulletin

Bulletins are periodic external (e.g. Airbus) or Edelweiss internal publications containing in-depth background information. Typically, they cover technical, safety, operational or planning aspects. They are important for crews to keep up to date.

2.1.2.5 Guide / Topic

Guides or topics are typically designed as an in-depth presentation of a specific topic, such as green procedures, weather, performance etc. and can be produced in-house or by an external source e.g manufacturers, organisations, training facilities.

2.1.3 Signature of Documents

2.1.3.1 Signature of Operational Documents

Controlled operational documents are published in Yonder according a strict workflow and it includes an automated approval process, which does not require an explicit manual signature.

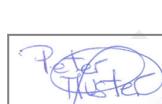
Some documents published in Yonder (e.g.: infos, memos, bulletins, etc.), in order to express their origin, the name of the author and their job title might be stated at the bottom of the document as additional information only:

Peter Muster

Head of XXX

Financially binding operational documents require a qualified signature according the guideline "Unterschriften- und Finanzkompetenzenreglement". (COSMOS → WORK → IT → Digitale Unterschrift).

Any other documents related to operations may be signed either manually (on a paper or on an electronic device), or electronically with a non-qualified electronic signature.

Description	Example
<p>A <u>standard version</u>, which shows at least the signer's name, the country, the organisation (Edelweiss Air AG) and organisation unit, the signer's email, the reason for signing and the date.</p>	
<p>A <u>simplified version</u>, which only shows the signer's name.</p>	
<p>A second <u>simplified version</u>, which is an image of a manual signature.</p>	

2.1.3.1.1 Criteria for the Use of Electronic Signatures of Operational Documents

External Documents

Electronic signature of external documents, which might be used outside Edelweiss:

- Only the standard version, or a more qualified one, is allowed.

Internal Documents

Electronic signature of internal documents, which are to be used exclusively inside Edelweiss:

- All types of signature (the two simplified versions, the standard version and any qualified one) are allowed, depending on the nature and relevance of the document.

2.1.3.2 Signature of Non-Operational Documents

For non-operational documents, refer to Edelweiss guideline “Unterschriften- und Finanzkompetenzenreglement” (COSMOS → WORK → IT → Digitale Unterschrift).

2.2 Format and Form of Distribution

Edelweiss operations manuals and other operational documentations are distributed in an electronic format (EDP) and as hardcopy if required.

The following distribution channels are available:

Distribution Channel	Office Office PC	OCC Office PC / EFB	Cockpit Crew EFB	Cabin Crew Cabin iPad	External Service Providers
Yonder Website	X	X	X	X	
Yonder App ¹		X	X	X	
FlySmart+ AIB App ¹		X	X		
mPilot Lido App ¹		X	X		
CAE eFM ¹		X	X		
Flypad App ¹			X	X	
COSMOS Website	X	X	X	X	
Company NOTAM ²			X		
FlyPad TOI ³			X	X	
Extranet					X
Company Email	X	X	X	X	X

¹ Off-line available

² Via CAE eFM

³ Via Flypad App

2.3 System of Amendment and Revision

2.3.1 Revision Overview

Edelweiss uses Yonder as its primary documentation platform for editing and publishing manuals.

The revision process of documents edited in Yonder is controlled by workflows. All workflows consist of a series of individual steps and activities that are governed by roles.

For the description of the Yonder documentation platform, refer to [OMM Yonder](#)

For the revision process for all manuals/documents edited in Yonder refer to [PM 128*](#) [OSQ Update & Initiate of New Documents](#). The sub-processes described in the following chapters complement and explain Process 128*.

Certain documents are edited outside Yonder and only stored as PDFs on Yonder. For the revision process of these documents refer to [OMM Content processed in an External Editor](#).

2.3.1.1 Establishment of New or Change of Existing Operational Policies and Procedures

Task	Responsibility	Actions	Remarks / Tools
Change initiation	All contributors	Opening change request Refer to OMM Yonder	Yonder Source/input: Internal or external audit, change in legal requirements and standards, yearly systematic review of OM, external documents, reporting system or projects
Preconsultation of proposal text	Document owner, responsible person	Reviewing and editing of proposal text	Yonder Preconsultation of proposal text by document owner or responsible person To facilitate understanding by end-users, the text should be reviewed by a person other than the author of the change request.
Draft 1	OCE	Editing of change request	Yonder Integration of proposal text into draft version
Internal approval 1	Document owner	Approval/rejection	Yonder Approval or rejection of change, i.e. based on: <ul style="list-style-type: none"> legal requirements not met human factors (i.e. links not functional and valid, spelling errors, outdated information)
Compliance review 1	CMM	Approval/rejection	Yonder

Task	Responsi-bility	Actions	Remarks / Tools
			<p>Approval or rejection of change based on:</p> <ul style="list-style-type: none"> • Legal requirements not met • Syntax: not fact-based/precise • Incorrect or missing legal reference <p>Verification for each change if prior approval is required according to OMM Changes Requiring Prior Approval</p>
Draft 2	OCE	Editing of change proposals raised during the compliance review process	<p>Yonder</p> <p>Modification of draft and integrating of results of compliance review 1</p>
Internal approval 2	Document owner	Approval/rejection	Refer to Internal Approval 1
Compliance review 2	CMM	Approval/rejection	Refer to Compliance Review 1
Regulation update (if required)	OCE	Update of legal links in Yonder	Yonder

2.3.1.2 Completion and Submission to FOCA (if applicable)

Task	Responsi-bility	Actions	Remarks / Tools
Preparation of documentation / Application	OCE	Preparation	<p>Documentation/Application package:</p> <ul style="list-style-type: none"> • For changes requiring prior approval refer to OMM Changes Requiring Prior Approval

Task	Responsi-bility	Actions	Remarks / Tools
			<ul style="list-style-type: none"> For changes/elements not requiring prior approval refer to OMM Changes/Elements not requiring Prior Approval
Compliance Check	CMM	Completeness check	Yonder, PRA/NMR, Compliance-List, List of Changes, MoC Completeness and internal cross-check with existing documentation, prior to submission of revised documents to FOCA
Submission	OCE	Submission	All documents required should be submitted via Filetransfer Service BIT
Consultation	FOCA	Evaluation	Document Evaluation Report (DER) If applicable a DER will be forwarded to the responsible person and the CMM.
Correction	Document owner	Correction/modification	Yonder Any correction necessary will trigger another draft loop according to OMM Establishment of New or Change of Existing Operational Policies and Procedures Document owner or responsible person shall correct/modify the revision according to Document Evaluation Report (DER)
Acceptance	FOCA	Signature	PRA/NMR As soon as all required changes are corrected by the responsible person FOCA signs the PRA/NMR and returns it to the responsible person.

2.3.1.3 Publication of Released and Approved Revision

Task	Responsi-bility	Actions	Remarks / Tools
Insertion of PRA/NMR	OCE	Insertion of form in Yonder	Yonder Insertion of signed PRA/NMR into the respective document
Publication	OCE	Closing and publication	Yonder

Task	Responsibility	Actions	Remarks / Tools
		of revision in Yonder	The dates shall be set according to OMM Criteria for Controlled Documents
Production (if required)	Responsible person refer to OMM Manual Library	Hardcopies	Production and distribution according to OMM Format and Form of Distribution
Information of the personnel	Responsible person refer to OMM Manual Library	Setting of change notifications in Yonder	Yonder: Change notification & Tasks Evaluation of which changes should be supplemented by additional information
IQSMS	CMM	Update of IQSMS Library	IQSMS Updating the IQSMS manual library with the effective date and version number
Information of the auditors	CMM	Inform auditors	E-Mail Auditors shall be informed about the new manual to perform the possible pending verification of implementation (VOI), refer to OMM Process Evaluation of Corrective Actions

2.3.1.4 Content processed not in Yonder

Manuals and documents that are not processed in Yonder follow the same sub-processes as described in [OMM Revision Overview](#). However, the editing process is not supported by the technical tools (Change Requests & Workflows) of Yonder. The document owner is responsible for ensuring that the process steps are followed.

2.3.2 Responsibilities for Issuance and Insertions

The ACM has the ultimate accountability for the content and publication of all Edelweiss manuals.

The ACM delegates the responsibility for content, content creation, publication and distribution according [OMM Manual Library](#) and [OMM Appendix - List of other Controlled Documentation](#).

2.3.3 System for Annotations of Effective Dates

The Yonder documentation platform is a software solution based on an XML database, i.e. content is stored in information modules which are combined into documents. When a document is revised, only the affected information modules are edited.

Therefore, each information module is provided with the following two information:

- Validity: Validity period of the module
- Version: Revision with which the content was inserted into the document

Example		Explanation
Validity	01.07.2022 - open	The content of this module was changed with Revision 12, which became effective on 01.07.2022. "Open" means that the module is still valid. This is the standard designation for the latest version of a document, as each module must be valid.
Version	Revision 12	<p>Note: Modules in archived revisions have an "effective to date", e.g. 01.07.2022 - 31.08.2022</p>

This information can be retrieved by any user by accessing the module view in Yonder.

The architecture of Yonder does not allow an "effective from date" to be set retroactively. Therefore, it is not possible for a document to come into effect before it is published in Yonder.

2.3.4 Annotations of Changes

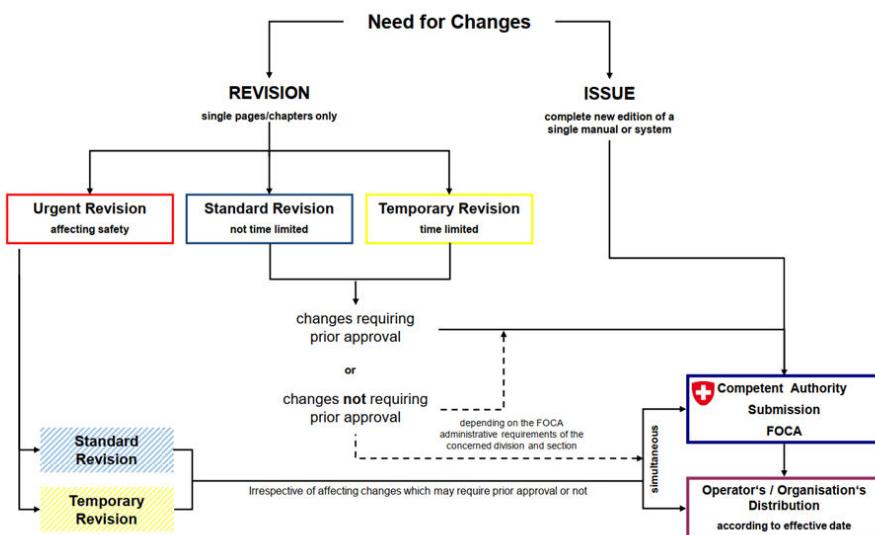
A revised module is marked with a vertical revision bar on the right side of the changed module.

Furthermore, each change can be provided with a change notice, which is displayed to the users as a task to be processed. These tasks can be distributed to the users on a role basis (e.g. CMD, FO, SC etc.).

The processing of the tasks by the users is monitored by the "Compliance Report" function.

2.3.5 Types of Revisions

Depending on the situation, the revisions may be carried out as:



Standard Revision:

Regularly and permanently performed changes on specific content. These changes in any Edelweiss documentation shall ensure continued legal compliance through internal compliance verification. It is required to ensure continued validity of the AOC and its privileges.

Temporary Revision:

Time limited changes or amendments, published additionally to the revision in effect. Temporary Revisions shall be cancelled after expiration or if no longer valid, appropriate or applicable.

Note: Temporary Revisions are not applicable for CAMO.

Urgent Revision:

When immediate amendments or revisions are required in the interest of safety, they may be published and implemented immediately, provided that any required approval has been applied for and FOCA is supplied without delay with the intended revision by e-mail (including published notification to crew). Immediate revisions may be published time limited as Temporary Revision or as Standard Revision. Urgent and time critical changes are issued via Memos and communicated by means of Company NOTAM, Flypad TOI, Yonder notification/task and if required via e-mail and/or extranet (i.e. for service providers).

2.4 Documentation Policy

Operational documentation and data shall be available to operations personnel while carrying out their duties. The content shall be current, legible and accurate. The format

shall be appropriate for use in operations under consideration of human factor principles. When applicable, documents and data shall be approved or accepted by FOCA.

The application for an amendment/revision should be submitted to FOCA with a PRA, at least 60 days before the date of intended change (change of nominated person at least 20 days before). The main manual update processes are documented in the PM.

Hand written amendments and revisions are not allowed and not possible in Yonder.

2.4.1 Criteria for Controlled Documents

A controlled document is a document that must be subject to controlled revision, formal review, formal approval, controlled distribution and controlled storage and access.

All operations manual and sub-manual to the OM (refer to [OMM Manual Library](#)) shall be controlled documents. A controlled document is revised by the revision process of Yonder and contains the following information:

Information	Description
Document title	Document title (usually the abbreviation)
Document description	Either the full name of the document or further info if deemed necessary
Document owner	Responsible persons of the document
Version label	The version/revision number of the document
Effective from date	The date as of which the document is effective
Effective to date	The date as of which the document ceased to be valid ¹
Visible from date	The date as of which the document is visible for the users ²

¹⁾ If the document is still valid, "open" is displayed

²⁾ For Operations Manual, the "visible from" date should be 14 days before the "effective from" date to provide users with adequate time to review the changes. During this period, the document is marked as "invalid: effective from DD.MM.YYYY".

Document users shall ensure that they access documents exclusively through official distribution channels (refer to [OMM System and Form of Distribution](#)) where the full revision process is assured.

2.4.2 Uncontrolled Documents

Uncontrolled documents have subordinate functions and are not part of the Edelweiss management system.

Uncontrolled documents are not amended by revisions.

2.4.3 Identification and Control of Paper Documents

Printed versions of manuals/documents might have a temporary character, are uncontrolled and must be rechecked for validity before use.

2.4.4 Withdrawal / Invalid Documents

Documents that are no longer valid shall be clearly marked as invalid and shall be archived, removed and/or deleted whenever possible.

2.4.5 Revision and Numbering

Revisions and numbering of controlled manuals and documents which are revised via the revision process in Yonder are managed by OCE.

The responsibility of managing revisions and numbering of manuals/documents which are revised in an external editor but published via Yonder lies with the document owner of the respective manual/document. He must inform OCE about any new revisions to ensure the timely exchange of the manual/document in Yonder.

Revisions shall be numbered consecutively.

The terms "Issue", "Revision" or a combination of both shall be used.

2.5 Changes requiring Prior Approval

Any changes in the AOC, ATO and CAMO affecting the following:

- the scope of the certificate or the terms of approval of the Edelweiss organisation
- elements of Edelweiss' management system:
 - the lines of responsibility and accountability throughout the operator including a direct safety accountability of the accountable manager
 - the description of the overall philosophies and principles with regard to safety, referred to as safety policy
- the procedure describing how changes not requiring prior approval will be managed and notified to FOCA
- any item on the current FOCA Compliance List AOC Aeroplane labelled "Approval" available on the FOCA website
- any item on the current FOCA Compliance List ATO labelled "Approval" available on the FOCA website
- any item according to [CAME Procedure for changes requiring prior approval](#).

require a prior approval by FOCA.

The application shall be submitted before any such change takes place, in order to enable FOCA to amend, if necessary, the organisation certificate and related terms of approval attached to it.

The change shall only be implemented upon receipt of formal approval by FOCA. EDW will operate under the conditions prescribed by FOCA during such changes as applicable.

For changes requiring prior approval or if deemed necessary, the Edelweiss organisation conducts a safety risk assessment and provide it to the competent authority on request. Refer to [PM 107* OS Change Management and Safety Assessment](#).

Application time frames

The application for the amendment of an air operator certificate (AOC) shall be submitted at least 30 days before the date of the intended changes.

In the case of a planned change of a nominated person or of a safety manager, FOCA shall be informed at least 20 days (10 days for ATO) before the date of the proposed change.

Unforeseen changes shall be notified at the earliest opportunity.

Documentation/Application package

Edelweiss will provide FOCA with the relevant documentation.

The application package consists of:

- PRA (Proposed Revision/Amendment) incl. list of changes
- Compliance List
- Operational Application Form 330 (if applicable)
- Form 2 (if applicable)
- Form 4 (if applicable)
- Form 105 (if applicable)
- Management of Change (MoC)
- Written résumé (an assessment of Edelweiss why this person meets the required qualifications for the function and how and by whom it was assessed)
- Other documents as required (e.g. MEL, FCOM, curriculum vitae, licences or certificates)
- Revised document(s) electronically in a storables format (e.g. PDF)

Note: Larger files (e.g. PDF export) cannot be transmitted via e-mail. Therefore, the application package should be submitted via file transfer Service BIT/OFIT.

Important: If any doubts remain, whether a planned change requires prior approval, contact FOCA for advice and coordination.

Refer to [PM 128* OSQ Update & Initiate of New Documents](#).

Application Forms for Management Personnel

Details and contacts of management personnel (including deputies) listed in [OMM Key Management Personnel of the Operations Division - Functions, Names and Contacts](#) are reported to FOCA with the following forms:

- Form 4 (Air Operations)
- Form 105 (ATO)
- Form 2 (Part-CAMO)

Current forms are available on the FOCA webpage.

It is the responsibility of Edelweiss to evaluate and nominate sufficient and qualified personnel according applicable legal and internal requirements.

FOCA reviews the application to verify the organisation's compliance. It may ask for more information and/or invite the candidate for an interview/assessment to prove competence.

2.6 Changes not requiring Prior Approval

Changes that do not fall in the scope of [OMM Changes/Elements Requiring Prior Approval](#) do not require prior approval.

Nevertheless, the intended changes shall be forwarded to FOCA at least 30 working days before the effective date.

No amendment/revision shall take place before the application has been submitted to FOCA.

Revisions/amendments shall be processed and concluded entirely before new changes are initiated.

Refer to [PM 128 OSQ Update & Initiate of New Documents](#).

For changes not requiring prior approval in the CAME refer to [CAME Procedure for changes not requiring prior approval](#).

The process how changes "not requiring prior approval" are treated shall include at least following steps:

- The compliance monitoring manager shall check, that

- the change is in accordance with [OMM Safety and Security Policy](#) and that DOC 180 has been applied;
- no items requiring prior approval are included;
- no revision requiring a prior approval from FOCA is pending of the concerned manual.
- no revision/amendment of the concerned part/manual/document is in process and/or pending at FOCA.
- The compliance monitoring manager shall check compliance against valid rules and FOCA guidance material.
- The ACM and the respective nominated person are releasing the planned revision.

Documentation/Application package

Edelweiss will provide FOCA with the relevant documentation.

The application package consists of:

- NMR (Notification of Manual Revision)
- Compliance List
- List of Changes
- Management of Change (MoC)
- Other documents (if applicable)
- Revised document(s) electronically in a storable format (e.g. PDF)

2.7 Control of External Documentation

Edelweiss implements external documents such as laws, international regulations, standards, industry best practices, technical instructions, OEM documentation etc. This chapter describes the control of these external documents.

2.7.1 Involved Parties and Responsibilities

Every Nominated Person or manager is responsible for:

- Identifying new issues and changes in legal requirements and standards.
- Analysing the impact of changes to external documents on Edelweiss's policies, processes and procedures.
- Documenting and implementing these changes to maintain legal compliance.

The Compliance Monitoring Manager supports the NP and managers and supervises this process as described in the following subchapters.

2.7.2 Identification of Legal Requirements and Standards

In addition to the internal process of identifying changes to legal requirements and standards, Edelweiss uses the service provided by the LHG Legal Requirements Monitoring Group. The LRM Group is a Center of Excellence consisting of aviation law experts assigned by the LHG aviation organisations. The group provides information about news and changes in the air law requirements (from EASA, ICAO, FOCA) and industry best practices (from IATA incl. IOSA) and assesses their relevance.

The LRM Group works redundantly and informs Edelweiss Compliance Monitoring through standardised emails.

Edelweiss Compliance Monitoring ensures compliance with applicable legal requirements by monitoring and reviewing the EASA RSS-Feed service about Regulations, Agency Decisions, Certification Specifications, AMCs and GMs, Easy Access Rules and MMEL, among others.

During monthly internal inspections, Edelweiss Compliance Monitoring reviews changes to the EASA, FOCA and IOSA web pages.

2.7.3 Processing, Implementation and Supervision of Legal Requirements and Standards

In case the CMM identifies new or modified legal requirements or standards relevant to Edelweiss, the following process is initiated:

- Edelweiss Compliance Monitoring (OSQ) supports the affected departments by notifying them per email, in accordance with [PM 127 OSQ EDW Supplier & Distribution Legal Requirements](#) and Doc 56 Auditor/Inspector Guide – Task allocation of Legal Requirements and Standards, and keeps track of these notifications.
- Each affected department, under the responsibility of its respective NP or manager, analyses the impact of the changes and documents and implements them.
- The CMM independently analyses the impact of the changes and, if necessary, plans the corresponding Difference Audit within the Audit Plan to supervise the implementation of new or modified requirements or standards.

2.8 Documentation Platform

Edelweiss uses two main documentation platforms for editing, revising and storage of operational documents.

2.8.1 Yonder

Yonder is an XML-based documentation tool and the primary platform for editing, revising and distributing manuals and documents.

Yonder enables access to documents either via the webclient or the offline application.

Yonder is primarily used for operationally relevant documents which crews use in daily operations. During the flight, all documentation in Yonder is available to the crews in the offline application (refer to [OMM System and form of distribution](#)).

The revision process of documents edited in Yonder is controlled by workflows. All workflows consist of a series of individual steps and activities that are governed by roles. Assigning these roles ensures that only users with the required roles can perform a particular workflow activity. For example, only users with the "Compliance approver" role can perform the Compliance Approval step in Yonder.

Changes to the content are initiated by opening a "Change Request (CR)". These CRs are controlled by workflows and edited by OCE. Change Requests can be submitted by any user.

Workflow roles shall only be assigned by OCE and upon request by the responsible Document Owner.

Note: Only OCE have the necessary permissions to assign workflow roles in Yonder

For the detailed documentation of workflows and workflow roles refer to [Yonder Content Concept](#) (Non Operational Files → Content Concept).

Yonder automatically archives all the outdated revisions of the manuals and documents. Furthermore, all change requests, change notices and tasks are stored in the system. This enables the complete tracking of changes in the manual landscape at any time.

A backup of all data stored in Yonder is done twice daily. This done by the provider according to the SLA.

2.8.2 COSMOS (SharePoint)

The internal information portal COSMOS is based on the SharePoint server and acts as a single point of entry for all information containers, tools and documents stored on the SharePoint server.

SharePoint is a web-based collaboration platform that provides a connection to Microsoft products (MS Office, MS Teams, MS OneDrive, File Explorer, etc.). All Edelweiss employees have access to SharePoint.

All documents created in the above mentioned products are stored on the SharePoint server. For each document, a revision history is generated, which enables the tracking of changes.

SharePoint enables offline editing of the synchronised files. Microsoft OneDrive ensures synchronisation of the changes with the SharePoint server as soon as the user is online once again.

Access to the documents stored in SharePoint is controlled by department/team assignments. The document owner may share files with users outside the department/team.

The documents stored on SharePoint are not primarily operationally relevant (e.g. working documents, corporate guidelines etc.).

DRAFT

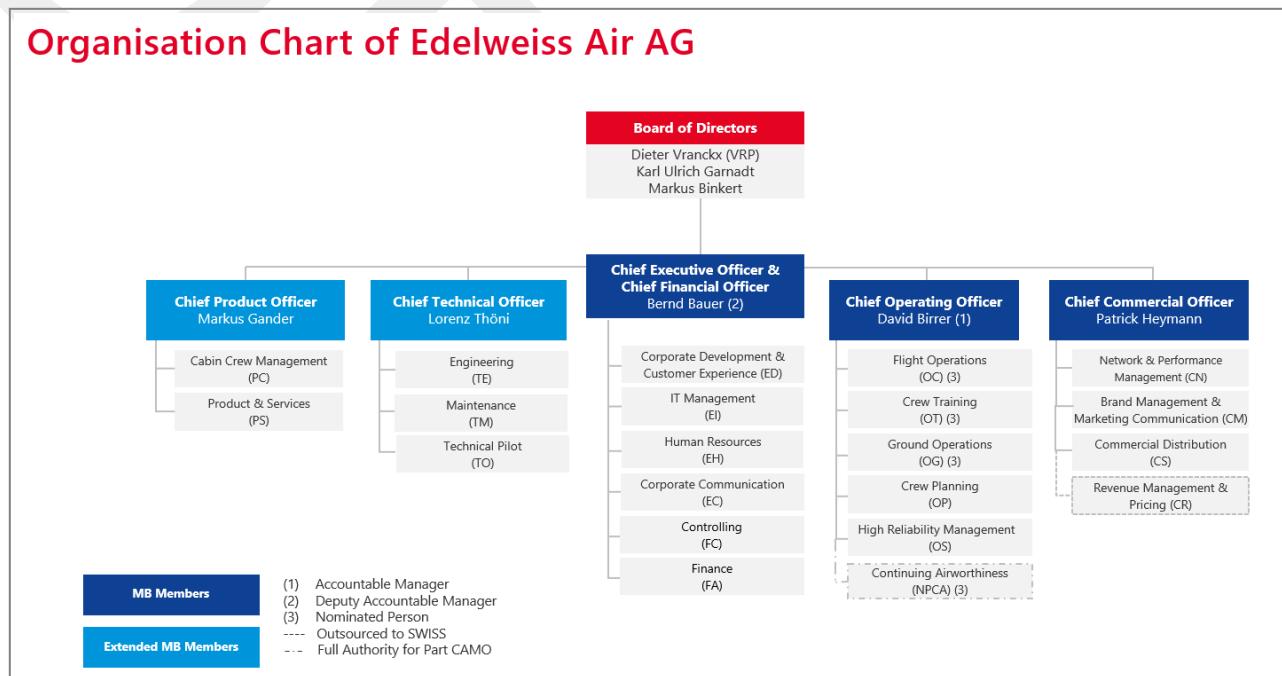
3 Organisational Structure, Duties, Responsibilities and Accountabilities

Edelweiss is a group company of Deutsche Lufthansa AG. It has its own Management with own profit and loss as well as operating responsibility.

3.1 Organisational Structure

A complete overview of the corporate organisation can be found on Edelweiss SharePoint (Cosmos → About → Mitarbeiterverzeichnis).

3.1.1 Edelweiss Corporate Organisation



3.1.1.1 Board of Directors

The Board of Directors bears overall responsibility for the strategic direction of Edelweiss and for personnel decisions at top management level. The Board of Directors also determines the basic organisation of the company and supervises the activities of the Management Board.

Members of the Board of Directors are nominated by the General Meeting of Lufthansa.

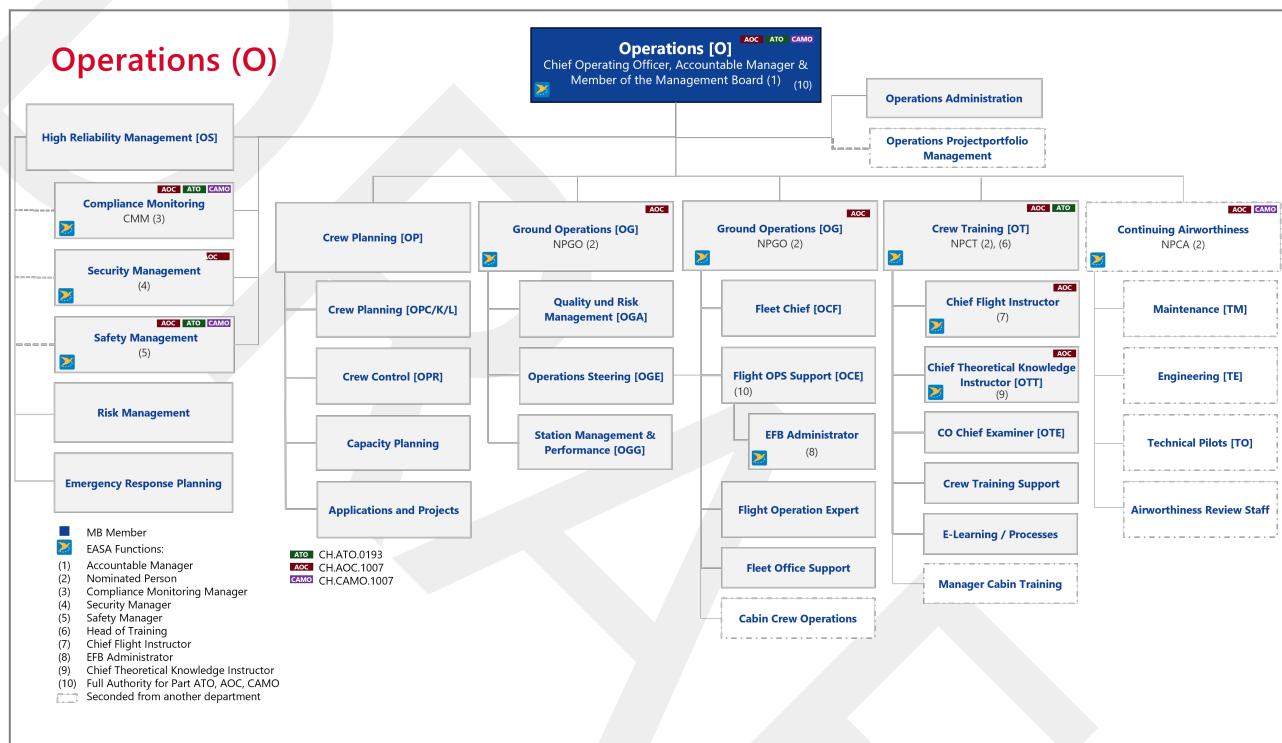
3.1.1.2 Edelweiss Management Board

The Edelweiss Management Board is responsible for the operational management of Edelweiss and reports to the Board of Directors for the company's results. The management of the Management Board lies with the CEO.

The members of the Management Board are appointed by the Board of Directors.

3.1.2 Accountable Manager Organisation

This organisation chart reflects the structure of Edelweiss Operations Division and ensures an overall safety accountability of the Accountable Manager over the integrated management system of Edelweiss as per the approvals described in [OMM Scope of Activity](#).



The above structure ensures that the relevant function holders for the AOC / CAMO / ATO approvals, as well as the CMM, SM, and SeM have direct access to the Accountable Manager.

3.1.2.1 Operations Division Responsibilities

The Operations Division:

- Is responsible for the operation of the aircraft in accordance with Annex IV to Regulation (EC) No. 2018/1139 and the air operator certificate
- Shall ensure that every flight is conducted in accordance with the provisions of the operations manual

- Shall establish and maintain a system for exercising operational control over any flight operated under the terms of its certificate
- Shall ensure that its aircraft are equipped and its crews are qualified as required for the area and type of operation
- Shall ensure that all personnel assigned to, or directly involved in, ground and flight operations are properly instructed, have demonstrated their abilities in their particular duties and are aware of their responsibilities and the relationship of such duties to the operation as a whole
- Shall establish procedures and instructions for the safe operation of each aircraft type, containing ground staff and crew member duties and responsibilities for all types of operation on the ground and in flight. These procedures shall not require crew members to perform any activities during critical phases of flight other than those required for the safe operation of the aircraft
- Shall ensure that all personnel are made aware that they shall comply with the laws, regulations and procedures of those States in which operations are conducted and that are pertinent to the performance of their duties
- Shall establish a checklist system for each aircraft type to be used by crew members in all phases of flight under normal, abnormal and emergency conditions to ensure that the operating procedures in the operations manual are followed. The design and utilisation of checklists shall observe human factors principles and take into account the latest relevant documentation from the aircraft manufacturer
- Shall specify flight planning procedures to provide for the safe conduct of the flight based on considerations of aircraft performance, other operating limitations and relevant expected conditions on the route to be followed and at the aerodromes or operating sites concerned. These procedures shall be included in the operations manual
- Shall establish and maintain dangerous goods training programmes for personnel as required by the Technical Instructions that shall be subject to review and approval by FOCA. Training programmes shall be commensurate with the responsibilities of personnel.
- Shall ensure that the Nominated Persons and their Deputies are not nominated by another organisation, unless agreed with the Accountable Manager and the competent Authorities concerned.

Specific CAMO responsibilities of the Operations Division:

The Operations Division has the overall and final responsibility for ensuring that all aircraft maintenance is conducted in accordance with requirements of part-M and part-CAMO.

In particular the organisation is responsible for providing adequate maintenance contractual arrangements with an appropriately approved part-145 maintenance organisation, which includes adequate facilities, installations, materials, tools and competent qualified personnel in sufficient numbers in order to perform aircraft maintenance on time in accordance with the applicable rules, regulations and standards.

Consequently, the Accountable Manager has the financial responsibility for all maintenance arrangements and ensures with his organisation that:

- The necessary manpower resources and facilities are available to perform the maintenance management and any additional work as required
- Adequate contractual arrangements exists
- Provision of maintenance facilities, tools and material
- The necessary qualified staff with adequate theoretical and practical training are available
- A liaison with the [Nominated Person Continuing Airworthiness](#), the [Compliance Monitoring Manager](#) and the [Safety Manager](#) is established for regular review of the compliance monitoring and safety management system inside the part-CAMO
- The administrative policies and procedures for the maintenance coordination are available
- The safety and security standards, according the Edelweiss's [Safety & Security Policy](#) are ensured at any time
- New or improved practices or procedures for the increase of safety, security and efficiency are evaluated and introduced
- Establishment, revision and distribution control of this Continuing Airworthiness Management Exposition (CAME) are assured.

Specific ATO responsibilities of the Operations Division:

- Is remaining in compliance with the relevant requirements of Regulation (EC) No 216/2008
- Ensures that the entire training is provided in compliance with the appropriate requirements and standards
- Provides adequate facilities for classroom instruction and have available appropriately qualified and experienced instructors.
- Ensures the satisfactory integration of flight training in an aircraft or a flight simulation training device (FSTD) and theoretical knowledge instruction
- Ensures that any contracted training organisation has the necessary authorisation or approval when required, and commands the resources and competence to undertake the task in accordance with the applicable regulations, standards and the Edelweiss [Safety & Security Policy](#).

3.1.2.2 Personnel involved in the Operations Division

3.1.2.2.1 Job Description (Leistungsauftrag)

Any operational manager (including nominated persons) as well as any other person holding a safety or aviation security critical function requires a job description. The job

description shall contain the descriptions of the respective legal function and specify the duties, responsibilities and accountabilities, including:

- The responsibility to ensure operations and airworthiness are conducted in accordance with applicable regulations and standards of Edelweiss
- Accountabilities of members of management, irrespective of other functions, as well as of non-management personnel with respect to the safety performance of the Operations Division
- The authority and responsibility for liaison with regulatory authorities, original equipment manufacturers and other operationally relevant external entities as applicable
- The responsibility for applying and maintaining the SMS as well as the SeMS in the relevant area of competence and responsibility and that it is performing according to the requirements.

The duties, responsibilities and accountabilities for crew members are set out in [OM A Authority, Duties and Responsibilities of the Commander](#) and [OM A Duties and Responsibilities of Crew Members other than Commander](#).

DOC 62 is the template to be used and contains detailed instructions on how to fill in the job description. A yearly review is done during the appraisal talk (MAG). All signed job descriptions are published in COSMOS → WORK → Edelweiss Intern → Public Documents → Leistungsaufräge.

3.1.2.2.2 Managerial Continuity

Operational managers (including nominated persons) as well as any other person who has a safety, security, or compliance critical function shall have a deputy. In absence of the function holder, the deputy shall ensure the continuity of supervision and has the same authorities as the superior being deputised.

It is the responsibility of each operational manager, that in a planned absence the nominated deputy is scheduled for duty and given the necessary time to take over accountabilities, duties and responsibilities of the concerned function. He is also responsible to notify his absence with an out-of-office email message. The notification shall include the information about the return date and contact details of the deputy and if necessary other support members.

3.1.2.2.3 Supervision of Personnel

Functional areas subordinated to the Accountable Manager shall appoint a sufficient number of personnel to ensure a safe, secure and reliable operation.

The duties and responsibilities of these supervisors shall be defined in their individual job description.

The supervision of crew members and other personnel involved in the operation shall be exercised by individuals with adequate experience and the skills to ensure the attainment of the standards specified in the operations manual.

The crew resource demand is reviewed on a monthly basis in order to determine the need of additional manpower.

3.1.2.3 Edelweiss Flight Operations (OC)

Flight Operations, as an integrated part of the Operations Division, ensures control of flight operations and the management of safety and security outcomes.

The responsibility for flight operations at Edelweiss lies with the Head of Flight Operations/Nominated Person Flight Operations (NPFO).

For the duties, responsibilities and accountabilities of the Nominated Person Flight Operations (NPFO) refer to [OMM Nominated Person Flight Operations \(NPFO\)](#).

3.1.2.4 Edelweiss Crew Training (OT)

Edelweiss is structured as an Air Operator with integrated ATO. The responsibility for crew training lies with the Head of Crew Training.

For the ATO structure, refer to [OM D Edelweiss ATO and AOC Training Structure](#).

For the duties, responsibilities and accountabilities of the Head of Training (HoT)/ Nominated Person Crew Training (NPCT) refer to [OMM Head of Training \(ATO\)/ Nominated Person Crew Training \(NPCT\) \(AOC\)](#).

3.1.2.5 Edelweiss Ground Operations (OG)

The responsibility for ground operations at Edelweiss lies with the Head of Ground Operations.

As Edelweiss does not maintain a ground handling organisation, handling agents and supervisors are therefore contracted at each destination. The handling of cargo and dangerous goods is contracted to SWISS WorldCargo worldwide.

For the duties, responsibilities and accountabilities of the Nominated Person Ground Operations (NPGO) refer to [OMM Nominated Person Ground Operations \(NPGO\)](#).

3.1.2.6 Edelweiss Continuing Airworthiness Management Organisation (TE)

Edelweiss has an AOC with an integrated Part-CAMO approved organisation. A management system containing compliance monitoring and safety management is established which monitors all activities in the continuing airworthiness management system to ensure that it remains safe according to the Edelweiss Safety Policy and compliant with Part-CAMO and Part-M. For the complete management structure, refer to the organisation management chart in [OMM Accountable Manager Organisation](#).

For the duties, responsibilities and accountabilities of the Nominated Person Continuing Airworthiness (NPCA) refer to [OMM Nominated Person Continuing Airworthiness \(NPCA\)](#).

3.1.2.7 Edelweiss High Reliability Management (OS)

The scope of the Edelweiss High Reliability Management is to provide the top management with an integrated view of the various risks and areas of improvement identified through the management systems, i.e. SMS, SeMS, and CMS, and to promote and facilitate the adoption and implementation of the highest reliability standards possible.

The High Reliability Management ensures the overarching coordination between the management systems without interfering with the AOC/ATO/CAMO regulatory structures, accountabilities and responsibilities:

- Safety processes are led and defined by the Safety Manager
- Security processes are led and defined by the Security Manager
- Compliance monitoring processes are led and defined by the Compliance Monitoring Manager.

The SM, SeM, and CMM are therefore completely independent in their roles and accountabilities and have non-filtered and unbiased direct access to the Accountable Manager. Direct access is defined as having the right to address any safety or compliance-relevant issue at any time and in a personal manner (e.g. in an ad-hoc face-to-face meeting) to the Accountable Manager.

The High Reliability Management organisation supports Edelweiss in keeping the operational risks under organisational control and promotes the continuous improvement of the operational processes through the aggregated distribution of the data analytics collected within the safety, security, and compliance functions. The ultimate goal is to have an organisation operating well above the legal compliance level and oriented to industry best practices.

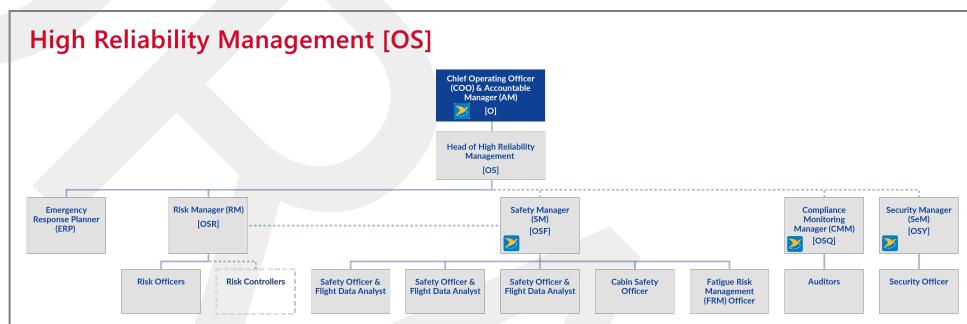
Integrating all the existing management systems into one High Reliability Management department ensures the ability to accumulate and aggregate all identified risks into one landscape. This enables the risk owners (Accountable Manager, NPs) and other decision-makers to have a coordinated and focused overall picture of the Operations.

The main tasks of the OS department are the following:

- Aggregate all identified risks within the safety management system, security management system and compliance monitoring system into one landscape to enable the Accountable Manager, NPs and other higher managers to have a coordinated and focused overall picture of the Operations and to take fact-based strategic and operational decisions

- Support the responsible persons in ensuring that processes, procedures, protocols and guidelines within the Operations Division are continuously reviewed to ensure consistency and adaptivity to the internal and external circumstances based on the HRO principles
- Ensure cases of operational success are duly analysed and investigated to understand why the safety and security performance has been achieved in a given circumstance with the ultimate goal of disseminating the learning throughout the Operations Division.

For the duties, responsibilities and accountabilities of the Head of High Reliability Management, refer to [OMM Head of High Reliability Management](#).



3.2 Key Management Personnel of the Operations Division - Functions, Names and Contacts

Function	Holder of Function	Contact Details	Req. Forms
Accountable Manager (O)	David Birrer	Ph: +41 43 456 56 77 david.birrer@flyedelweiss.com	Form 4 Form 105
	Daniela Ceschi (Deputy)	Ph: +41 43 456 55 29 daniela.ceschi@flyedelweiss.com	Form 4 Form 105
Chief Operating Officer (O)	David Birrer	Ph: +41 43 456 56 77 david.birrer@flyedelweiss.com	N/A
	Philipp Federer (Deputy)	Ph: +41 43 456 55 77 philipp.federer@flyedelweiss.com	N/A

Function	Holder of Function	Contact Details	Req. Forms
Emergency Response Planner (ERP)	Daniela Ceschi	Ph: +41 43 456 55 29 daniela.ceschi@flyedelweiss.com	N/A
Head of High Reliability Management (OS)	Daniela Ceschi	Ph: +41 43 456 55 29 daniela.ceschi@flyedelweiss.com	N/A
Safety Manager (OSF)	Laurent Bobay	Ph: +41 43 456 56 29 laurent.bobay@flyedelweiss.com	Form 4 Form 105
	Tobias Maurer (Deputy)	Ph: +41 43 456 55 69 tobias.maurer@flyedelweiss.com	Form 4 Form 105
Compliance Monitoring Manager, CMM (OSQ)	Bruno Tobler	Ph: +41 43 456 50 98 bruno.tobler@flyedelweiss.com	Form 4 Form 105
	Reto Meier (Deputy)	Ph: +41 43 456 55 63 reto.meier2@flyedelweiss.com	Form 4 Form 105
Security Manager (OSY)	Reto Sigran	Ph: +41 43 456 55 76 reto.sigran@flyedelweiss.com	N/A
	Carina Demuth (Deputy)	Ph: +41 43 456 55 82 carina.demuth@flyedelweiss.com	N/A
AOC			
Nominated Person Flight Operations, NPFO (OC)	Manuel Burgauer	Ph: +41 43 456 56 51 manuel.burgauer@flyedelweiss.com	Form 4
	Martin Bühlmann (Deputy)	Ph: +41 43 456 55 98 martin.buehl-	Form 4

Function	Holder of Function	Contact Details	Req. Forms
		mann@flyedelweiss.com	
Nominated Person Crew Training, NPCT (OT)	Florian Affolter	Ph: +41 43 456 57 12 florian.affolter@flyedelweiss.com	Form 4
	Samuel Berger (Deputy)	Ph: +41 43 456 57 18 samuel.berger@flyedelweiss.com	Form 4
Nominated Person Ground Operations, NPGO (OG)	Philipp Federer	Ph: +41 43 456 55 77 philipp.federer@flyedelweiss.com	Form 4
	Philip Kobel (Deputy)	Ph: +41 43 456 56 35 philip.kobel@flyedelweiss.com	Form 4
Nominated Person Continuing Airworthiness, NPCA (TE)	Stefan Meier	Ph: +41 43 456 55 35 stefan.meier@flyedelweiss.com	Form 4
	Fritz Zaugg (Deputy)	Ph: +41 43 456 57 39 fritz.zaugg@flyedelweiss.com	Form 4
EFB Administrator (OCE)	Gregor Tschudi	Ph: +41 43 456 55 85 gregor.tschudi@flyedelweiss.com	N/A
	Harry Gubler	Ph: +41 43 456 55 71 harry.gubler@flyedelweiss.com	N/A
Company Chief Examiner	Edouard Schmutz	Ph: +41 43 456 55 37 edouard.schmutz@flyedelweiss.com	N/A
ATO			
Head of Training, HoT	Florian Affolter	Ph: +41 43 456 57 12 florian.affolter@flyedelweiss.com	Form 105

Function	Holder of Function	Contact Details	Req. Forms
	Samuel Berger (Deputy)	Ph: +41 43 456 57 18 samuel.berger@flyedelweiss.com	Form 105
Chief Flight Instructor, CFI	Edouard Schmutz	Ph: +41 43 456 55 37 edouard.schmutz@flyedelweiss.com	Form 105
	Pascal Charmillot (Deputy)	Ph: +41 43 456 50 64 pascal.charmillot@flyedelweiss.com	Form 105
Chief Theoretical Knowledge Instructor, CTKI	Stephan Mayer	Ph: +41 43 456 57 40 stephan.mayer@flyedelweiss.com	Form 105
	Florian Affolter (Deputy)	Ph: +41 43 456 57 12 florian.affolter@flyedelweiss.com	Form 105
CRM/Security/DG Training	Stephan Mayer	Ph: +41 43 456 57 40 stephan.mayer@flyedelweiss.com	Form 105
	Florian Affolter (Deputy)	Ph: +41 43 456 57 12 florian.affolter@flyedelweiss.com	Form 105
Crew Safety Training	Stephan Mayer	Ph: +41 43 456 57 40 stephan.mayer@flyedelweiss.com	Form 105
	Florian Affolter (Deputy)	Ph: +41 43 456 57 12 florian.affolter@flyedelweiss.com	Form 105

3.3 Key Management Personnel of the Operations Division - Duties, Responsibilities and Accountabilities

3.3.1 Accountable Manager

3.3.1.1 Function

The Accountable Manager (ACM) is appointed by the Chief Executive Officer (CEO).

He reports to the Chief Executive Officer (CEO).

The Accountable Manager (ACM) has corporate authority for ensuring that all operations, training and maintenance activities can be financed and carried out in order to make policy decisions, provide adequate resources, resolve safety and security issues and ensure the necessary system components are in place and functioning properly according to the standard required by the authority and any additional company requirements.

His position within the Edelweiss Management Board is Chief Operating Officer (COO). He is a member of the Edelweiss Management Board and leads the Edelweiss Accountable Manager Organisation AOC.

He leads the following departments:

- Flight Operations (OC)
- Crew Training (OT)
- Ground Operations (OG)
- Crew Planning (OP)
- Continuing Airworthiness (TE)
- High Reliability Management (OS) (incl. Compliance Monitoring (OSQ), Safety (OSF) & Security (OSY)).

He also oversees the Emergency Response Organisation (ERO).

3.3.1.2 Duties and Responsibilities

The Chief Operating Officer & Accountable Manager, Member of the Management Board:

- Leads his direct reports in line with the company strategy and the relevant policies and regulations.
- Has overall budget responsibility for operation departments, ensures cost-effectiveness and defines performance indicators.
- Ensures legal and regulatory documents and the compliance of the entire operation with relevant laws and regulations.
- Is responsible for economically implementing a safe, secure, and compliant operation.
- Sets the overall operation strategy in accordance with the company strategy.

- Is responsible for all operational contracts and SLAs in accordance with the strategic orientation.
- Ensures availability of sufficient manpower and financial means for all operational departments and necessary safety and security relevant investments or expenditures to guarantee the required safety and security standards.
- Is responsible for the maintenance and continuous improvement of the Management System (SMS) in all areas of the organisation.
- Promotes a corporate culture where all employees see and live operational safety, security, and quality according to the "just culture principle".
- Conducts regular meetings with all nominated persons and responsible managers for Safety, Compliance Monitoring and Security or arranges special meetings if necessary.
- Conducts the Management Evaluation (ME) four times per year.
- Conducts the Safety Review Board (SRB) twice per year.
- Establishes regular Safety Action Group (SAG) Meetings.
- Informs the Management Board about relevant operational matters.
- Represents Edelweiss in operational matters at national and international regulatory institutions as well as in aviation operations and safety-related organisations.
- Represents Edelweiss in operational matters within the Lufthansa Group Process Domains, ensuring legal conformity and autonomy of the Edelweiss Management System (SMS) and interests.
- Acts as Ops Picket in irregular ops situations.

3.3.1.3 Accountabilities

The Chief Operating Officer & Accountable Manager, Member of the Management Board is accountable:

- towards the Management Board for the delivery of a safe, secure, reliable, punctual, and comfortable operation
- to the National Authority (FOCA) compliance with laws and regulations
- for the airworthiness of all fleets under the AOC of Edelweiss
- for the quality and safety standards of all subcontracted services and bought-in products
- for the Management System, including the Fatigue Risk Management (FRM) program
- for the Change Management in accordance with the Edelweiss process (Change Management and Safety Assessment) and the timely and effective implementation of necessary mitigations
- for the Edelweiss Security Program (SSP) and that relevant training is properly established and maintained (Security KPIs, Number of incidents with relevant risk level)
- for the awareness and accountability of Edelweiss executives and staff for their safety performance and that regular evaluation of the effectiveness of Edelweiss safety management system and operational performance take place.

3.3.1.4 Powers and Authorities

The Chief Operating Officer & Accountable Manager, Member of the Management Board:

- has legal Authorities as Member of the Management Board
- has the authority to define operational quality, safety and security standards, release the Edelweiss safety policy, make policy decisions, and allocate necessary resources to manage safety and security risks in operations
- ensures and has the authority that all operations and maintenance activities can be financed and carried out to the standard required by the National Authority and any additional requirements defined by the operator
- enforces the specified standards of performance of all operational processes and takes all necessary actions to guarantee these standards
- secures the required financial, personnel and infrastructure to ensure appropriate initial and recurrent training of all operational personnel
- issue directives in functional and disciplinary matters to all subordinated members of the accountable management organisation as required by the management system irrespective of Edelweiss' or LHG's divisional setup, including CAMO relevant safety, security, and quality topics
- enforces in close cooperation with the HR-department personnel changes in his area of responsibility if deemed necessary
- rejects suppliers, service-providers and other stakeholders in the operational value chain which do not fulfil the Edelweiss safety standards.

3.3.2 Head of High Reliability Management

3.3.2.1 Function

The Head of High Reliability Management reports directly to the Accountable Manager. He is responsible for the High Reliability Management department and leads the Safety Manager, the Security Manager, and Compliance Monitoring Manager in their management activities without influencing their direct access to the Accountable Manager.

3.3.2.2 Duties and Responsibilities

The Head of High Reliability Management:

- Leads his direct reports within the High Reliability Management Department in line with the Edelweiss strategy and the relevant policies and regulations.
- Develops the strategy, policy, and processes of a high reliability organisation and manages any changes thereto.
- Promotes, applies and reinforces the deployment of HRO principles throughout the Operations division.
- Aggregates all identified risks within the compliance monitoring system, safety management system, and security management system into one landscape to

enable the Accountable Manager, NPs, and other higher managers to have a coordinated and focused overall picture of the Operations and to take strategic and operational decisions.

- Support the responsible persons in ensuring that processes, procedures, protocols and guidelines within the Operations Division are continuously reviewed to ensure consistency and adaptivity to the internal and external circumstances based on the HRO principles.
- Makes sure cases of operational success are duly analysed and investigated to understand why the safety and security performance has been achieved in a given circumstance with the ultimate goal of disseminating the learning throughout the Operations Division.
- Raises awareness of the AM, NPs and higher management on topics of concern within the aviation industry and initiates an impact assessment analysis on their perceived effect on the organization's operations.
- Drives a proactive exchange with the CMM, SM, and SeM to facilitate alignment on the high reliability topics within the High Reliability Management department.
- Consolidates inputs across all disciplines of the management system to reduce errors, eliminate unsafe processes and increase the involvement of staff towards a resilient culture capable of detecting, containing and bouncing back from events that occur.
- Ensures proper liaison with external entities and international industry committees (e.g. LH Group Process Domains) to represent and safeguard Edelweiss' interests.
- Acts as Emergency Response Planner and is responsible for the development, implementation, and update of the Company CERM (Crisis and Emergency Response Manual).
- Promotes the continuous improvement process of the Operations Division by ensuring the data analytics collected within the High Reliability Management department are distributed to the affected stakeholders and used to operate above the legal compliance level and oriented at building and maintaining a resilient operation.
- Works with key stakeholders within the Operations Division to support ongoing projects with the expertise of the High Reliability Management department.
- Is responsible for the establishment and continuous improvement of an effective Process Management System and Documentation Management System supporting Edelweiss's operational requirements in terms of safe, reliable, and efficient performance.

3.3.2.3 Powers and Authorities

The Head of High Reliability Management has the right to:

- Contact any person within Edelweiss, directly or indirectly, in relation to the tasks specified in this job description
- Implement all necessary decisions and measures to ensure a safe, secure and compliant operation in close cooperation with operational and technical

departments (e.g. OG, OC, OP, OT, TE, TM, T, PC), after consultation with the SM, and SeM, and CMM, as required

- Access all documentation and systems of the Operations Division except for:
 - any safety and human factor related documents
 - meeting minutes declared as “confidential” by the safety department (OSF)
 - any recorded data (e.g. flight or voice data, etc.)
- Attend any meeting or training inside the Operations Division except for confidential safety, just culture and human factor meetings/debriefings.

3.3.3 Safety Manager

3.3.3.1 Function

The Safety Manager is appointed by the Accountable Manager.

The Safety Manager reports directly to the Accountable Manager. He is a member of Edelweiss High Reliability Management.

3.3.3.2 Duties and Responsibilities

The Safety Manager:

- leads and empowers the Safety Management Team (OSF) both disciplinary and functional
- develops and manages the Safety Management System and the Fatigue Risk Management System on behalf of the Accountable Manager
- monitors/facilitates hazard identification and safety risk analysis
- monitor the implementation of actions taken to mitigate risks
- monitors corrective actions and evaluates their effectiveness
- develops, monitors and propose Safety Objectives, Performance Indicators and Performance Targets for the area of his responsibility
- maintains SMS relevant records and documentation up to date
- defines the content of the SMS training and plans/organises SMS promotion
- chairs SAG and FSAG
- provide periodic reports on safety performance to the safety review board (Part-CAMO)
- ensure the initiation and follow-up of internal occurrence investigations
- has the lead in safety investigations
- represents the contact unit for confidential/anonymous reports from flight crew, cabin crew and ground staff
- provides periodically information on operational safety at corresponding meetings to Accountable Manager or CEO (e.g. ACM Meeting). He also brings incidents and non-routine occurrences on a confidential and anonymous basis to the attention of the Accountable Manager (see Vereinbarung über die Verwendung von Datenaufzeichnungsgeräten an Bord von Flugzeugen der Edelweiss)

3.3.3.3 Powers and Authorities

The Safety Manager has the right to:

- contact any person within Edelweiss directly or indirectly in the frame of the specified tasks of his job description
- contact directly any contracted operator or other service provider, and the regulatory authorities
- represent the interests of Edelweiss on national and international boards (e.g. LH Group) or any other institution he deems necessary for his work
- access all documentations and systems relevant for the operation
- attend any meeting or training inside the entire accountable manager organisation.

3.3.4 Security Manager

3.3.4.1 Function

The Security Manager is appointed by the Accountable Manager (ACM).

The Security Manager reports directly to the Accountable Manager (ACM). He is a member of High Reliability Management (OS).

The Security Manager co-ordinates and controls (in close cooperation with the Head of High Reliability Management) security measures in compliance with respective laws in all operational areas. He follows a risk-based approach to security matters (Risk and Threat Assessment) within the company and initiates preventive or corrective measures if necessary.

3.3.4.2 Duties and Responsibilities

The Security Manager:

- ensures that all the appropriate personnel are familiar and comply with the relevant Air Carrier Security Programme (ACSP) of Edelweiss
- responsible developing, applying and maintaining the Security Management System (SeMS) in his area of responsibility
- develops and promulgates company-wide security standards and recommended practices to reach an optimal degree of security
- complies with the understanding of legislation and regulations relating to federal laws of Switzerland, based on ICAO Annex 17, ECAC DOC 30, EU Regulation 2320 / 2002, MSP/USA and the NASP, all dealing with security issues and measures in international civil aviation
- implements general information and initiating special security measures during periods or incidents of increased threats
- ensures an effective risk analysis, threat assessment and response capability in close communication with SWISS and Federal Police (RBA-Sibel Meeting)

- assists and advises Training Departments (OT/LAT) in the security instruction and training of flight and cabin crew members as well as ground personnel
- implements the concept of Air Marshals and stationed security guards in cooperation with the Federal Police (Training, Planning Assignment, Administration and Finance)
- defines policy and procedures regarding unruly passengers, inclusive necessary decisions and actions
- supervises any implemented security measures from annual audit- and inspection programs, including analysing of yearly station inspection check sheets, to ensure effectiveness of the Security Programme
- supports and assists the Compliance Monitoring Manager in security matters
- establishes a security incident reporting mechanism
- provides sufficient human and financial resources in order to meet set targets and standards in respect to security
- establishes and maintains an effective relation and communication with authorities in the field of security
- is a member of the National Aviation Security Committee (NASC)
- is the official Edelweiss representative concerning security expert groups or state organisations such as ICAO, ECAC, EU, IATA, IACA, TSA, FAA or other Civil Aviation Offices and Regulators.

3.3.4.3 Powers and Authorities

The Security Manager has the right to:

- contact any person within Edelweiss directly or indirectly
- participate, if necessary, in the planning and decisions which are on executive level but concern security at the same time
- to implement all necessary aviation security measures within Edelweiss
- to implement all necessary decisions within his scope for a secure flight operations
- to define security standards, policies and implementing measures
- to manage Edelweiss's security staff inside the security department.

3.3.5 Compliance Monitoring Manager

3.3.5.1 Function

The Compliance Monitoring Manager (CMM) is appointed by the Accountable Manager (ACM).

He reports and has direct access to the Accountable Manager (ACM). He is a member of the Reliability Management department.

The Compliance Monitoring Manager (CMM) is responsible for the management of the Edelweiss compliance monitoring in operational, training and maintenance aspects.

3.3.5.2 Duties and Responsibilities

The Compliance Monitoring Manager:

- ensures the compliance monitoring program is properly implemented, maintained, and continually reviewed and improved
- develops and maintains an actual manpower plan for the compliance monitoring department (OSQ) and the yearly auditing plan
- develops and monitors safety key performance indicators of OSQ
- is responsible to discuss legal requirements with all concerned parties and ensures that all procedures are documented, implemented, and re-evaluated
- reviews and validates all document change requests (e.g. PRA, NMR, AOC, OPS spec.) to ensure legal compliance and smooth coordination with FOCA
- monitors compliance with the designed processes and procedures and all relevant requirements and standards to ensure safe activities and that these activities are carried out properly under the supervision of the nominated persons (operational Safety Assurance)
- carries out audits and inspections to fulfil the requirements of the compliance monitoring program as stated in [OMM Compliance and Conformance Monitoring Program](#) and he communicates the results to the responsible, the Accountable Manager and FOCA if required
- is the single point of contact to authorities and other legal bodies for applications, findings, due dates, audit and inspection reports, etc.
- disseminates compliance relevant information to management and non-management personnel (e.g. ME/SRB, SAG, accountable manager meeting, quarterly reports, guidelines, memos, etc.)
- assesses and analyses the outcome of audits and inspections, discusses deficiencies with the applicable entity and ensures corrective and preventive actions are implemented and effective
- manages the company-wide documentation system (excluding documentation tracked by yonder system) by providing guidance and support to responsible authors and leading document distributors
- defines the content of the compliance monitoring training and plans/organises compliance promotion
- leads, trains, develops and evaluates Edelweiss auditors and inspectors
- continuously develops his knowledge in the field of compliance monitoring by visiting training courses, congresses, workshops, etc.
- represents the interests of Edelweiss on national and international compliance monitoring management boards (e.g. LH-Group).

3.3.5.3 Powers and Authorities

The Compliance Monitoring Manager has the right to:

- direct access to the Accountable Manager, all parts of the operator, any contracted operator or other service provider, and the regulatory authorities (FOCA)
- demand changes and/or improvements resulting from the compliance monitoring programme
- refuse or to request amendments of document change requests if legal compliance is in doubt or not granted
- limit or suspend the privileges of auditors and inspectors
- limit or stop operations in case of level 1 findings
- to access all documentations and systems relevant for the operation
- to attend any meeting or training inside the Operations Division.

3.3.6 Nominated Person Continuing Airworthiness (NPCA)

3.3.6.1 Function

The Nominated Person Continuing Airworthiness (NPCA) is appointed by the Accountable Manager (ACM)

He reports and has direct access to the Accountable Manager (ACM). He is a member of Edelweiss Accountable Manager Organisation AOC.

The Nominated Person Continuing Airworthiness (NPCA) has the overall technical responsibility for the Edelweiss fleet and coordinates and oversees the activities in the field of Continuing Airworthiness Management of Edelweiss according to the Part-CAMO and operational requirements.

3.3.6.2 Duties and Responsibilities

The Nominated Person Continuing Airworthiness:

- is responsible for the aircraft asset management
- ensures the fleet is properly maintained by contracts approved by the authorities with suitable Part 145 maintenance firms (line and base maintenance)
- is responsible for the maintenance and reliability programme approved by the authorities and analyses the effectiveness thereof
- plans and coordinates the maintenance schedule with the flight operation and the maintenance company
- supports the instruction of flight crew in technical matters
- is responsible for the invoice control within his department
- advises and supports the Accountable Manager during technical investments and aeroplane acquisition
- is responsible for the asset management of the fleet and coordinates fleet planning related issues with other involved departments and contractors
- advises and supports the Accountable Manager in technical and insurance matters during incidents / accidents

- manages and assesses the performance of the staff members reporting to him. Conducts annual staff appraisal interviews. Coordinates personnel relevant issues like employment contracts or legal regulation issues with human resources
- is responsible for the punctual execution of mandatory modifications
- is responsible for the decision about implementation and execution of non-mandatory modifications
- applies the company wide safety management system in his department and takes the necessary provisions
- provides sufficient human and financial resources in order to meet set targets and standards in respect to safety and security
- continually examines risks and employs risk minimising measures using the company-wide "risk management tools"
- maintains in his area the autonomous compliance monitoring (quality system) and supports OSQ in this regard.
- is responsible for a customised MEL (minimum equipment list) approved by the authorities in coordination with the Technical Pilot.
- is responsible for the coordination and punctual reporting system with the authorities in his department (authorizations, occurrence reporting)
- is responsible for the compliance with applicable and relevant regulations (i.e. EASA) standards (i.e. IOSA) and any additional requirements and standards as established by Edelweiss (i.e. LH group standard).

3.3.6.3 Powers and Authorities

The Nominated Person Continuing Airworthiness has the right to:

- keep contact with all internal and external concerned parties and ensures an appropriate exchange of information
- hire and to dismiss employees in his department
- the financial authority according to internal regulations
- to develop and sign contracts with suppliers according Edelweiss contract regulations
- to internally approve maintenance program variations and MEL extensions
- to limit aircraft operations due to technical issues.

3.3.7 Nominated Person Flight Operations (NPFO)

3.3.7.1 Function

The Nominated Person Flight Operations (NPFO) is appointed by the Accountable Manager (ACM).

He reports and has direct access to the Accountable Manager (ACM). He is a member of Edelweiss Accountable Manager Organisation AOC.

The function of the Nominated Person Flight Operations (NPFO) is performed by the Head of Flight Operations. He is responsible for the management and supervision of flight operations.

He is responsible to ensure that in developing the flight operations concept, full recognition is given to the need for safe and efficient operations. He must ensure that every flight is conducted in accordance with the provisions of the operations manual and that crews are qualified, as required for the area and type of operation.

He is the executive responsible for the development and implementation of the respective flight operations manuals, policies and for direct supervision of the line operations on all fleets.

3.3.7.2 Duties and Responsibilities

The Nominated Person Flight Operations:

- ensures safe flight operations (flight deck and cabin matters) under the Edelweiss AOC
- defines all operational aspects (philosophies, policies, procedures, checklists) for a safe operation
- leads and supports the flight crew members
- leads, qualifies, develops, and promotes direct reports and management personnel
- is responsible for applying and maintaining the Safety Management (SMS) including the Fatigue Risk Management (FRM) and Aviation Security Management in his area of competence and is responsible for its performance according to the requirements
- ensures safe flight operations under the Edelweiss AOC
- adheres to the process according to Edelweiss quality systems
- is responsible for the adequate number of flight crew members selected, trained, and checked according to the performance standards to fulfil operational demands
- manages crew utilisation within all legal and contractual rules and regulations
- is responsible for the compliance with applicable and relevant regulations (i.e. EASA), standards (i.e. IOSA) and any additional requirements and standards as established by Edelweiss (i.e. LH group standard)
- is responsible for the accuracy and up-to-date legal flight documentation for flight crew members
- assesses and nominates his direct reports (in co-operation with EH) and in accordance with his superior
- decides on dismissals
- sets, monitors, and assesses the safety goals for all fleets in close co-operation with the flight Safety Assurance department based on occurrence reports, air safety reports, risk assessments, flight data monitoring, and other operational weaknesses identified
- investigates risks in assigned areas with the help of the company-wide “risk management tool” and works out mitigation measures

- ensures that the required standards and procedures according to the Edelweiss quality system are carried out
- is responsible for ensuring delegation of authority and assignment of responsibility within the management system for liaison with regulatory authorities, original equipment manufacturers, and other operationally relevant external entities
- ensures regulatory conformity of flight documentation
- ensures reliable and economical flight deck operations according to company standards
- provides all necessary and legal information to flight crew members
- decides about training standards in coordination with the Nominated Persons Crew Training
- sets and monitors leadership goals for all flight operations management personnel, examiners, and instructors as well as commanders of Edelweiss
- defines performance standards of flight crews and ensures them through screening, training, and checking according to company procedures
- issues yearly qualifications for all pilots and manages the confidential employee files and guarantees compliance with the regulatory agency
- defines the standards of training of operational personnel assigned to duties in connection with the preparation and/or conduct of flight operations of Edelweiss
- ensures adequate pilot's job marketing and hires flight crews according to overall Edelweiss demand
- ensures a balanced number of FTE and requirement of flying personnel (crew productivity) in cooperation with operations planning
- ensures optimized crew productivity by suitable planning systems and methods (includes authority for respective directives of flight operations planning)
- informs his superior about staff and operational incidents and irregularities
- negotiates and implements contractual matters with pilot unions
- leads project activities according to the project management process
- adheres to the budget of his area.

3.3.7.3 Powers and Authorities

The Nominated Person Flight Operations has the right to:

- the decision-making competency to implement all necessary decisions and measures for a safe, secure, and compliant flight operation in close cooperation with operational and technical departments (e.g. OG, OC, OT, OP, OS, T, P)
- the financial authority according to internal regulations
- to limit or stop aircraft operations due to operational safety or aviation security issues.

3.3.8 Head of Training (ATO)/Nominated Person Crew Training (NPCT) (AOC)

3.3.8.1 Function

The Head of Training / Nominated Person Crew Training (NPCT) is appointed by the Accountable Manager (ACM)

He reports and has direct access to the Accountable Manager (ACM). He is a member of Edelweiss Accountable Manager Organisation AOC.

The Head of Training (HoT) leads the training division and acts as Nominated Person Crew Training (NPCT).

3.3.8.2 Duties and Responsibilities

The Head of Training / Nominated Person Crew Training:

- is responsible for the proper and timely conduct of the safety/security and operations-related training and checking for instructors, crews, and ground personnel
- monitors the training progress of trainees
- is the point of contact to the Federal Office of Civil Aviation (FOCA) in the field of crew training
- is responsible for the compliance with applicable and relevant regulations (i.e. EASA), standards (i.e. IOSA) and any additional requirements and standards as established by Edelweiss (i.e. LH group standard)
- participates in the GTC and is the representative of EDW crew training in the LH matrix organisation
- is responsible for the cooperation with suppliers and service providers in the field of crew training
- conducts the training for all crews, instructors, and dispatch (the technical responsibility for the dispatch training is delegated to OG)
- works independently with authorities as Nominated Person Crew Training and Head of Training
- draws up the performance assignments of all employees in the OT department
- is responsible for the standard of the cabin crew safety training
- conducts the instructor meetings and the instructor seminar
- is responsible for the specifications for course and simulator planning, and therefore has the technical responsibility for the position "Training Administration and Course Planning"
- prepares training documents and ensures the optimal execution of the courses
- prepares and maintains the **OMD** and other training documents
- suggests improvements regarding the safety, economy, and ecology of the crew training to O.
- ensures invoice control for all invoices generated in his department.

- leads and supports the Deputy OT, CFI, CTKI, OTK, Head of ESST, and other staff members in OT and defines their tasks and competencies through job descriptions.
- applies the company-wide safety management system (SMS) in the OT department
- continuously examines the area of responsibility for risks by employing the SMS and works out measures to minimize them.
- carries out autonomous quality assurance within the OT department and supports the Compliance Monitoring Manager in these matters.
- formulates the general training objectives during the O-meetings in cooperation with the O, OC, OP, PC and OS
- is responsible for the qualifications during the education, training, and checks, whereby necessary measures resulting from the candidate's performance are determined by OC (after consultation with OT, the involved instructor/examiner, and the candidate).

3.3.8.3 Powers and Authorities

The Head of Training/Nominated Person Crew Training has the right to:

- decide on training and further education of instructors and employees of the OT department (considering the veto right of O)
- decide on training discontinuations for qualification reasons, according the processes established for this purpose
- order corrective actions based on findings from audits/inspections to ensure the efficiency of processes in his area of responsibility (incl. contractors)
- take disciplinary action against employees within the OT department and, depending on the severity, involves O and EH
- the financial authority according to internal regulations.

Additional rights and obligations for the Head of Training are listed in [OM D Personnel Requirements, Duties and Responsibilities](#).

3.3.9 Nominated Person Ground Operations (NPGO)

3.3.9.1 Function

The Nominated Person Ground Operations (NPGO) is appointed by the Accountable Manager (ACM)

He reports and has direct access to the Accountable Manager (ACM). He is a member of Edelweiss Accountable Manager Organisation AOC.

The Nominated Person Ground Operations (NPGO) is responsible that ground operations are conducted in accordance with conditions and restrictions of the Air Operator Certificate (AOC), and in compliance with applicable regulations and standards of Edelweiss.

3.3.9.2 Duties and Responsibilities

The Nominated Person Ground Operations:

- is responsible for the ground handling organisation and dispatch
- organises, coordinates, and controls all ground and cargo handling services in close cooperation with the station manager
- ensures safe, efficient, economical, and punctual flight planning of dispatch
- is deputy of the COO (O)
- is responsible to FOCA regarding Edelweiss ground operations matters
- directs and supports his deputy and defines his duties and competencies
- holds annual appraisal interviews with each employee and defines training goals
- ensures that the OG training provisions are fulfilled (education and training)
- is responsible to coordinate labour contractual issues with EH
- defines all processes according to legal requirements in all important fields of action
- is responsible for ensuring delegation of authority and assignment of responsibility within the management system for liaison with regulatory authorities, original equipment manufacturers and other operationally relevant external entities
- executes internal safety assurance and applies the internal safety management system (SMS)
- provides sufficient human and financial resources in order to meet set targets and standards in respect to safety and security
- analyses his area of responsibility according to the risk management tool and generates corrective and preventive actions and risk mitigation measures
- is responsible to establish and manage the audit- and inspection plan of ground operations including management of ground handling stations
- ensures management of OG reporting system (IQSMS).
- is responsible for the coordination and punctual reporting system with the authorities in his department (authorizations, occurrence reporting)
- informs the COO of all personnel and operative occurrences and irregularities
- oversees the operation according to the flight plan and is largely responsible for the organisation of measures taken in case of irregularities
- ensures that cockpit and cabin crews receive the necessary flight documents at every departure airport punctually
- negotiates and organises all ground services (incl. de-icing) with the local agents
- organises and supervises cargo handling in cooperation with Swiss WorldCargo
- is the interface to SWISS ground services. The NPGO ensures, that all LX-operated WK flights are operated legally and hold all necessary permissions
- is responsible to obtain and publish all necessary traffic and overflight permits (in cooperation with SWISS)
- ensures that all necessary traffic rights are requested for any flights installed on short notice (within the ops-range)
- ensures the smooth provision of fuel at all stations (according to the contracts negotiated by F via LH Fuel Plus)

- runs the editing and ensures provision of correct passenger and crew numbers to the catering provider and other internal and external partners
- ensures adequate communication and information flow between internal and external partners (e.g. SWISS OCC, HCC and flight dispatch, airports, contractors)
- is responsible for the administration and statistics in his department
- is responsible for the crew-office and oversees the legal duty time limitations
- is responsible for definition of crew rotations in coordination with the OC, P
- creates audit plans and examines the efficiency of the stations
- controls all invoices which concern his department
- is responsible for the compliance with applicable and relevant regulations (i.e. EASA), standards (i.e. IOSA) and any additional requirements and standards as established by Edelweiss (i.e. LH group standard).

3.3.9.3 Powers and Authorities

The Nominated Person Ground Operations has the right to:

- select, hire and to dismiss employees in his department in cooperation with EH and O
- coordinate corrective or preventive actions (e.g. findings) in order to maintain a safe and efficient operation, including subcontractors
- take disciplinary sanctions within OG. Depending the severity, in coordination with HR
- the financial authority according to internal regulations
- budget for ground operations, OG
- revise and publish the Ground Ops Manual, GOM
- perform safety investigations in ground operations
- develop and sign contracts with suppliers all ground ops contracts
- order and arrange further education and training for OG employees
- design and rearrange job descriptions of ground ops employees
- the financial authority according to internal regulations.

3.3.10 EFB Administrator

3.3.10.1 Duties and Responsibilities

The EFB Administrator is:

- responsible for all the EFB applications installed, and for providing support to the EFB users regarding these applications
- checking potential security issues associated with the applications installed.
- managing hardware and software configuration of the EFBs, and for ensuring that no unauthorised software is installed

- ensuring that miscellaneous software applications do not adversely impact on the operation of the EFB and should include miscellaneous software applications in the scope of the configuration management of the EFB.
- ensuring that only valid versions of the application software and current data packages are installed on the EFB system
- ensuring the integrity of the data packages used by the applications installed
- ensuring the continuity of the management of the EFB system in the absence of the EFB administrator
- ensuring that each person involved in EFB administration receives appropriate training for their role and has a good knowledge of the proposed system hardware, operating system and relevant software applications, and also of the appropriate regulatory requirements related to the use of EFBs. The content of this training should be determined with the aid of the EFB system supplier or application supplier
- ensuring that the persons involved in EFB administration keep their knowledge about the EFB system and its security up to date.

3.3.11 Company Chief Examiner (CCE)

3.3.11.1 Duties and Responsibilities

The Company Chief Examiner:

- manages the SFE, TRE and senior examiners in accordance with FOCA requirements
- is the link between FOCA and the Edelweiss examiners
- cooperates independently with FOCA
- instructs the examiners working in his area
- submits applications for examiner training in consultation with O, OT and OC
- takes disciplinary measures for examiners (depending on the degree of severity, with the involvement of OT)
- publishes CCE information as required
- leads an agenda item "CCE" at the instructor meetings.

3.3.12 Chief Theoretical Knowledge Instructor (CTKI)

3.3.12.1 Function

The Chief Theoretical Knowledge Instructor manages and supervises the theoretical knowledge instructors.

The Chief Theoretical Knowledge Instructor is subordinated to and reports to the Head of Training.

3.3.12.2 Duties and Responsibilities

The Chief Theoretical Knowledge Instructor:

- supervises the theoretical knowledge instructors and the standardisation of all theoretical knowledge instruction
- assures that all theoretical knowledge instructors meet the qualification requirements and have the appropriate knowledge and experience for their activities
- supervises the execution of effective instruction
- analyses the teaching capabilities and competence of the theoretical knowledge instructors to ensure and improve the knowledge transfer during training activities
- develops, implements, and improves the teaching material, lesson plans, training publications and instructional means
- is responsible for the processing, storing, and filling of all documents and records according to the provisions of the management system in the ATO
- promotes corporate culture of safety and compliance
- manages and plans continuous education and career development of his subordinates.

3.3.12.3 Powers and Authorities

The Chief Theoretical Knowledge Instructor has the right to:

- define the actions to be taken if subordinates do not achieve or maintain the required standards of performance and/or associated behaviour
- implement corrective actions within his department.

3.3.13 Chief Flight Instructor (CFI)

3.3.13.1 Function

The Chief Flight Instructor manages and supervises the flight and synthetic flight instructors.

The Chief Flight Instructor is subordinated to and reports to the Head of Training.

3.3.13.2 Duties and Responsibilities

The Chief Flight Instructor:

- supervises flight and flight simulation training instructors and the standardisation of all flight instruction and flight simulation instruction
- assures that all instructors meet the qualification requirements for their activities
- monitors the validity of their licences, ratings, and medicals (in cooperation with OP)
- develops and implements instructor training and refresher programmes
- supervises the execution of safe and effective training

- analyses (in cooperation with the CTKI) the teaching capabilities and competence of the instructors to ensure and improve the knowledge transfer during training activities
- is responsible for the processing, storing, and filling of all documents and records according to the provisions of the management system
- records and analyses any occurrences and deviations from the standards and ensures corrective and preventive action within Edelweiss
- promotes corporate culture of safety and compliance
- manages and plans continuous education and career development of his subordinates.

3.3.13.3 Powers and Authorities

The Chief Flight Instructor has the right to:

- define actions to be taken if subordinates do not achieve or maintain the required standards of performance and/or associated behaviour
- to implement corrective actions within his department.

4 Safety Management System

4.1 Introduction to Safety Management System (SMS)

A Safety Management System (SMS) is an evolutionary development of the traditional flight safety program and represents a means for an industrial organisation to proactively manage the hazards that are a natural part of any specific commercial operation. Due to the increasingly diverse and complex nature of modern aviation, the implementation of an SMS carries a high potential of improving flight safety performance.

The European regulatory authorities have realised the importance of an effective safety management in contemporary aviation and therefore made it mandatory for every operator to introduce such a system as specified in the regulation of Commission Regulation (EU) No 965/2012 Annex III ORO.GEN.200 and ICAO doc. 9859 "Safety Management Manual" with regards to ICAO Annex 19, which present the comprehensive and worldwide valid standard in aviation.

Therefore, an effective management of safety issues is not only an ethical obligation towards the travelling public but also interesting to the company in financial terms. A strategic approach to managing safety is vital and an integral part of the business process parallel to the financial segment.

With these corporate aspects in mind, it becomes evident that "Safety" is not only of concern to staff directly involved in flight operations but that full participation of everyone in the company is necessary. It is therefore of vital importance for safety issues to be accounted for at top management level. From there safety awareness should permeate the entire organisation from the top down, thus creating a "safety culture" throughout the company. An SMS can be regarded as a roadmap to achieve this goal. It provides the organisational framework to constantly identify hazards and evaluate the associated risk.

Once that information is gained, the SMS describes how the company structure is used to conceive and implement remedial action for a specific safety concern. In this way a modern management-type approach is used for safety oversight.

How that process, which concentrates on the control of processes, works inside Edelweiss is described in this chapter. This is a "living document" and shall be revised periodically to reflect changes in organisational functions and responsibilities as they occur.

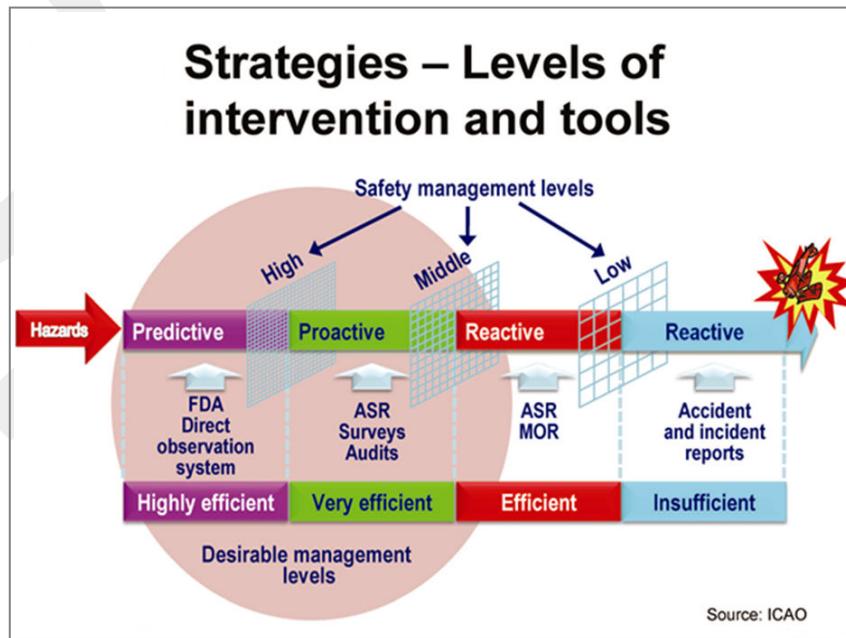
The SMS established by Edelweiss covers the entire AOC-Organisation, Approved Trainings Organisation (ATO) and Part-CAMO.

An important part of this SMS is the IOSA Flight Safety Analysis Program which is described below and mentioned in several parts of this chapter.

Flight Safety Analysis Program

The Flight Safety Analysis Program (ISARP ORG 3.3.1) consists of decision bodies, processes for identification of hazards, analysis, rating, recommendation and mitigation. The Safety Manager ([OMM Safety Manager](#)) is acting as the program manager for the Flight Safety Analysis Program (ISARP ORG 3.3.2).

4.1.1 Fundamental Beliefs of Edelweiss



We regard safety as one of our core responsibilities to implement strategies, management systems and processes which ensure the safety of our passengers, employees and equipment. Our goal is to constantly develop and improve on these to reach a standard of safety to meet – or exceed – national and international standards. As a well-established airline in Switzerland and on the European market we realised the necessity for a structured approach to create a level of safety, even before committees, associations or authorities were asking for it. Developing this, we figured out some objectives which guided us through this topic and evolved into the fundamental beliefs which represent the foundation of our safety work. As the entire High Reliability Management department (OS) is depending on information inputs from all sides to provide a safe environment, we strongly believe that every single employee of Edelweiss must acknowledge her/his accountability for the individual safety performance as well as the overall company safety level. While the elimination of accidents (and serious incidents) would be desirable, a one hundred per cent safety rate is an unachievable goal. Failures and errors will occur, in spite of the best efforts to avoid them. No human activity or human-made system can be guaranteed to be absolutely safe, i.e. free from risk.

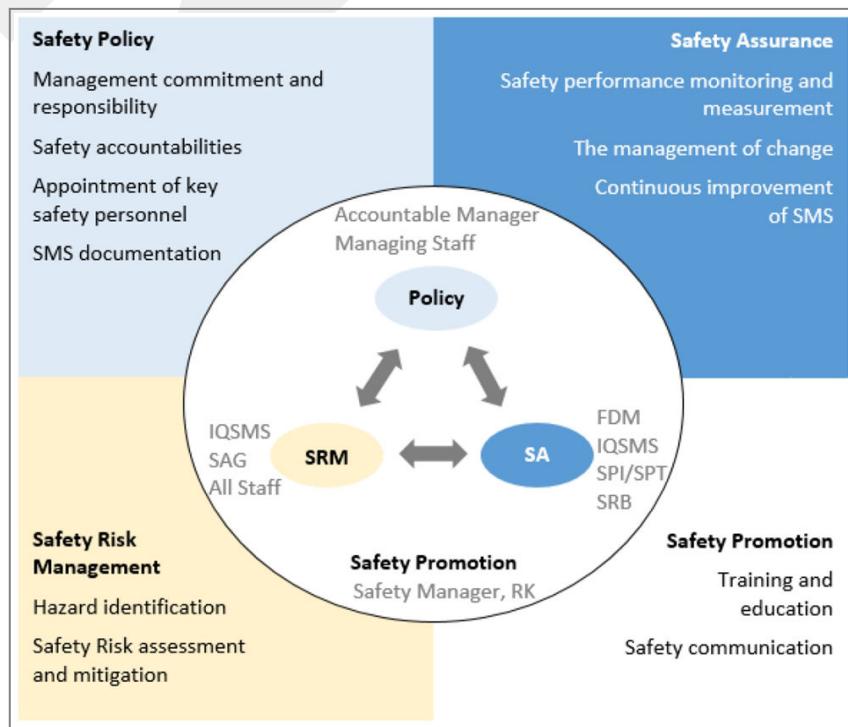
Safety is a relative notion whereby inherent risks are acceptable in a safe system. Although major air disasters are rare events, less catastrophic accidents and a whole range of incidents occur more frequently. These lesser safety events may be harbingers of underlying safety problems. Ignoring these underlying safety hazards could pave the way for an increase in the number of more serious incidents.

Accidents (and incidents) cost money. Although purchasing “insurance” can spread the cost of an accident over time, accidents make bad business sense. While insurance may cover specified risks, there are many uninsured expenses. In addition, there are less tangible (but no less important) costs such as the loss of confidence of the travelling public. An understanding of the total cost of an accident is fundamental to understanding the economics of safety.

In order to keep the dilemma between protection and production balanced in the mindset of all employees during their daily business, Edelweiss developed the following slogan:

“Mission is the Focus, Safety is the Attitude”

4.1.2 Overview of SMS Components and Operational Areas



4.2 Hazard Identification

4.2.1 Introduction

Hazard identification is the first step in managing safety and is obtained in a number of ways from a variety of reactive, proactive and predictive sources, for example:

- Hazard and incident reporting programs ([PM 115 OS Hazard Identification](#))
- Investigation and follow-up of reported hazards and incidents ([PM 106 OS Internal Investigation](#))
- Trend analysis ([PM 108* OS SPI/SPT Monitoring](#); [PM 109 OS Safety Performance Monitoring BowTie](#))
- Feedback from training and Crew (IQSMS Reports)
- Flight data analysis ([PM 100 OSF Flight Data Monitoring](#))
- Safety surveys and operational oversight safety audits ([PM 121 OSQ Audit](#))
- Monitoring normal line operations ([PM 122 OSQ Inspections](#))
- State investigation of accidents and serious incidents
- Information exchange programs
- Compliance monitoring and quality assurance program ([OMM Compliance and Conformance Monitoring Program](#); [PM 121 OSQ Audit](#)).

Most of the time the safety hazards creating risks become evident after an obvious breach of safety, such as incidents or accidents. Therefore, it is the aim of Edelweiss' Safety Assurance to proactively identify these hazards before an actual safety event occurs. This will be done through Edelweiss' safety management system.

A large number of different hazards with different cause types can threaten the company. The most common are:

- Design factors (equipment, task design, etc.) [TEC]
- Procedures and operating practises (documentation and checklists) [ORG]
- Communications (means, terminology, language, etc.) [HUM]
- Organisational factors (recruitment, training, etc.) [ORG]
- Work environment factors (light, noise, etc.) [ENV]
- Regulatory factors (authorities) [ENV]
- Defences (detection and warning systems) [ORG]
- Human performance [HUM] .

For a detailed definition of a hazard refer to [OMM Hazard](#).

4.2.2 Hazard Library (Risk Register)

All information concerning the identification of hazards is summarised in the hazard library created and maintained within the IQSMS Risk Management Module. The system automatically stores the required results of a MoC in the relevant databases. Each hazard can be tracked with a unique ID-number.

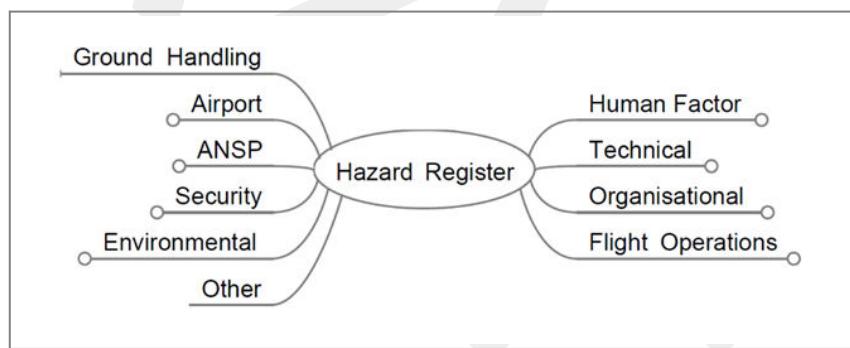
ID	Revision Date/Time	Event	Description	Threat(s)	Initial Risk	Controls	Residual risk	Consequence(s)	Additional information
29	2021-10-13 12:48:33	Number of not qualified gradings during simulator and line-	Number of not qualified gradings during simulator and line-	Lack of practical experience Reduced Selection	Severity Low / S2 Probability Very Low / P1	Additional training when marginal standard of performance Operation - Training (OT)	Severity Low / S2 Probability Remote / Pe	Reduction of pilots available for operation	Hazard: Simulator training

The Edelweiss Hazard Library stores the following data:

- Event and associated description
- Hazard (classified as additional information) with ID number
- Threat(s)
- Consequence(s)
- Initial & residual risk

4.2.3 Use of Hazard and Top Event (HTE) List

Each ESC classifies a specific event. To allow a clear identification of which type of event is meant, a hazard/top event from the Hazard and Top Event list (HTE) is assigned to the event. The HTE list is standardised within LHG and regularly revised, updated and implemented into the IQSMS. During an ESC-rating the drop-down-menu of the "Effect Group" lists in the IQSMS Risk Assessment module, all current Hazard and Top Events presently known to Edelweiss. The HTE list is grouped into following hazard clusters:



Hazard Clusters of the HTE

Example of HTE entries:

Hazard/Top Event (HTE) (IQSMS Hazard)	Hazard Cluster	Risk Owner	Factor
Tailwind Limit Exceeded	Flight Operations	FLT	HUM
Take Off Rejected - Other	Flight Operations	FLT	ENV
Take Off Rejected - Technical Reason	Technical	TEC	TEC
Taxiway Excursion or Risk of	Flight Operations	FLT	HUM
Taxiway Incursion or Risk of	Flight Operations	FLT	HUM
Technical Failure - Other	Technical	TEC	TEC
Technical Malfunction - Other	Technical	TEC	TEC
Terrain Clearance Lost	Flight Operations	FLT	HUM

The usage of the HTE list is a fundamental part of the event severity classification process ([PM 104 OS Event Severity Classification](#)).

4.3 Risk Management

The main objective of Edelweiss' risk management system is to make sure that all risks remain at or below an acceptable level.

As described in the previous chapter, the hazard identification process provides the input for the risk assessment.

Having identified a safety hazard, the associated risk must be assessed. Once we clearly understand the nature of the risk, a determination can be made whether it is acceptable to the company's level of safety and philosophy or not. Those found to be unacceptable must be eliminated or at least mitigated to an acceptable level.

This safety management system is centred on such a systematic approach to hazard identification and risk management. The implementation of the complete system aims at minimising the loss of human life, property damage and financial, environmental and societal losses. This is only possible when any data is available which can feed the risk management system. Hence, one primary objective of Edelweiss is to collect and evaluate as much information as possible related to overall safety.

Edelweiss obtains as much information as possible from internal and external sources. This enables the organisation to analyse a maximum amount of data in order to detect ineffective controls or new hazards. As soon as these are identified they will be dealt with according to the risk management process diagram ([OMM Edelweiss' Risk Management Process](#)).

The objective of an Operational Risk Assessment (ORA) is the assessment of operational risks in a systematic, robust and intellectually cohesive manner and is needed in three different contexts:

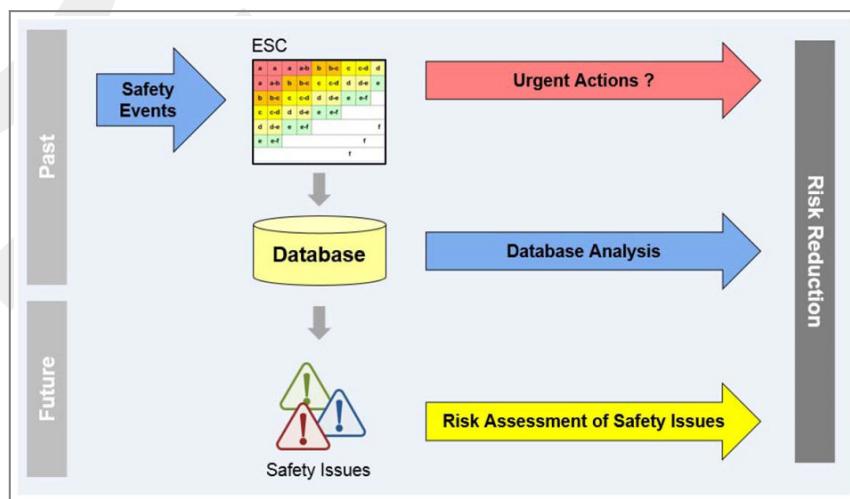
- Individual safety events may reflect a high level of risk and consequently require urgent action. Therefore, incoming events need to be risk assessed where appropriate. This step is called Event Risk Classification (ERC). Edelweiss is utilising the LHG Event Severity Classification (ESC) Matrix.
- The Hazard Identification process may lead to the identification of safety issues, which need to be risk assessed to determine what actions, if any are needed. This step is called Safety Issue Risk Assessment (SIRA). In addition the ESC rating units are converted into risk indexes (LHG concept).
- From time to time there will be a need to carry out safety assessments, typically related to a new or revised operational activity (e.g. new destination). The activity

needs to be risk assessed at the planning stage according to the “Management of Change” process of the company.

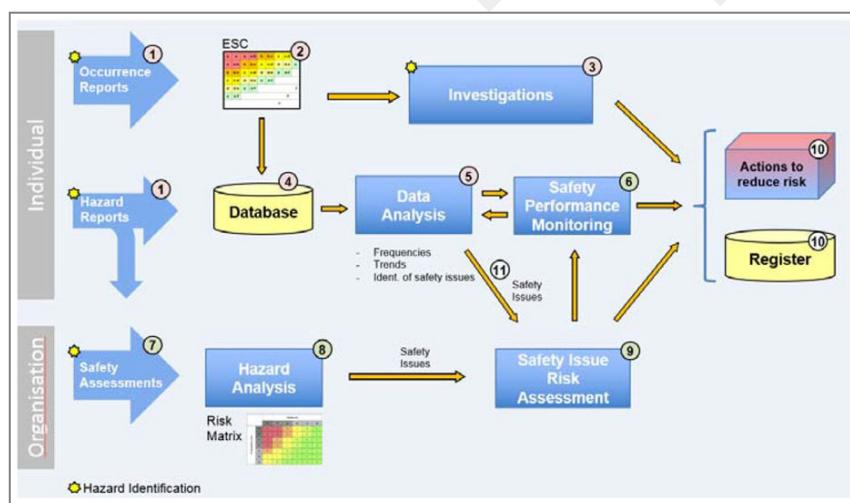
4.3.1 Edelweiss' Risk Management Process

Edelweiss Air uses the ARMS (Airline Risk Management Solutions) methodology fully integrated into the IQSMS application covering the major elements of the operational risk assessment concept and is triggered through the Management of Change Process ([PM 107 OS Change Management and Safety Assessment](#)).

Simplified ARMS Process:



ARMS Process in detail linked to the installed IQSMS modules:



#	Module	PM Reference
1	IQSMS Reporting	114 OS Processing of Occurrence Reports 102 OS Processing of CHFR
2	IQSMS Reporting-Classification ESC Rating	114 OS Processing of Occurrence Reports 104 OS Event Severity Classification
3	IQSMS Investigation	106 OS Internal Investigation
4	IQSMS Database	--
5	IQSMS/Tableau Statistics (HTE) / Hazard Identification	115 OS Hazard Identification
6	IQSMS Bow Tie and Tableau SPI/SPT	108 OS SPI/SPT Monitoring 109 OS Safety Performance Monitoring BowTie
7	Decision to trigger MoC	107 OS Change Management and Safety Assessment
8	Hazard Identification	115 OS Hazard Identification
9	Bow Tie and IQSMS MoC	117 OS Safety Issue Risk Assessment
10	Mitigation Processing	118 OS Mitigation Process
11	IQSMS Database	--
12	IQSMS Database	--

The ARMS methodology deals with various types of hazard identification data. The main rule is that ERC resp. [OMM Event Severity Classification](#) (LHG solution) is used for events (even when there is no actual consequence) and SIRA is used for issues (including hazards and latent conditions). The Risk Matrix is used within the Hazard Analysis tool.

All risk management data are stored and managed in the IQSMS database.

The methodology defines an overall process for operational risk assessment and describes each step. The assessment process starts with the Event Severity Classification (ESC), which is the first review of occurrences in terms of urgency and the need for further investigation.

The purpose of the Event Severity Classification (ESC) is to allow an initial classification of any event information on a standardised basis. It does not replace a risk assessment because it does not consider the number of events as well as the number of flights without events. It therefore considers only the likelihood of the remaining barriers failing,

not the probability of the event itself or the overall probability of the worst foreseeable outcome happening. While the sum of all event severity classifications indicates the "historic" amount of risk which was taken, a risk assessment of the underlying hazards and risks is additionally required to allow predictive risk management and to distinguish between acceptable, tolerable and unacceptable risks.

As the ESC method is a single event/incident severity classification, it applies predominantly to FODA/FDM reporting and investigation.

The next step is data analysis in order to identify current safety issues. These safety issues are then risk assessed in detail through the Safety Issue Risk Assessment (SIRA). The whole process ensures that any necessary safety actions are identified, creates a register for following up risks and actions and provides a safety performance monitoring function. SIRA can also be used to make safety assessments, which is a requirement of the "Management of Change" element of the SMS.

4.3.2 Risk Analysis

Having confirmed the presence of a safety hazard, some form of analysis is required to assess its potential for harm or damage. Typically, this assessment of the hazard involves two considerations:

- probability of the hazard precipitating an unsafe event (i.e. the probability of adverse consequences should the underlying unsafe conditions be allowed to persist);
- severity of the potential adverse consequences, or the outcome of an unsafe event.

Risk analysis involves consideration of both the probability and the severity of any adverse consequences; in other words, the loss potential is determined. In carrying out risk analyses, it is important to distinguish between hazards (the potential to cause harm) and risk (the likelihood of that harm being realized within a specified period of time). A risk analysis matrix (such as the one provided in [OMM Risk Matrix \(Level of Risk\)](#)) is the tool used within Edelweiss for prioritising the hazards most warranting attention.

Generally, as soon as the hazard has been added to the individual risk value, a process of remedial consequences will be set in motion. These findings will be brought forward to the next SAG meeting (OMM Safety Action Group (SAG)). If the Risk Index (RI) is equal or less than value "C" they may be forwarded to the responsible department directly. All other hazards (red & orange area) must be brought to the attention of the SAG. In all time critical matters, the Safety Manager has to call in the SAG with all the relevant participants the Safety Manager deems necessary.

Considerable literature is available on types of analyses used in risk assessment. Currently the International Organisation for Standardization (ISO) has a valid standard ISO 31000 and its standardisation family. Edelweiss has decided to align its risk procedures with Lufthansa Group standards. Refer to Lufthansa Group Safety Management Manual (LHG SMM).

If any further advice is necessary to determine the risk, the Safety Manager may invite additional experts (Risk controllers) as he/she deems necessary. Such a team has the task to develop and visualise the current risk situation concerning the identified hazard. A great method is the so-called “Bow Tie Model” based on asking a structured set of questions in a logical sequence (Refer to [OMM Bow Tie Model](#)”).

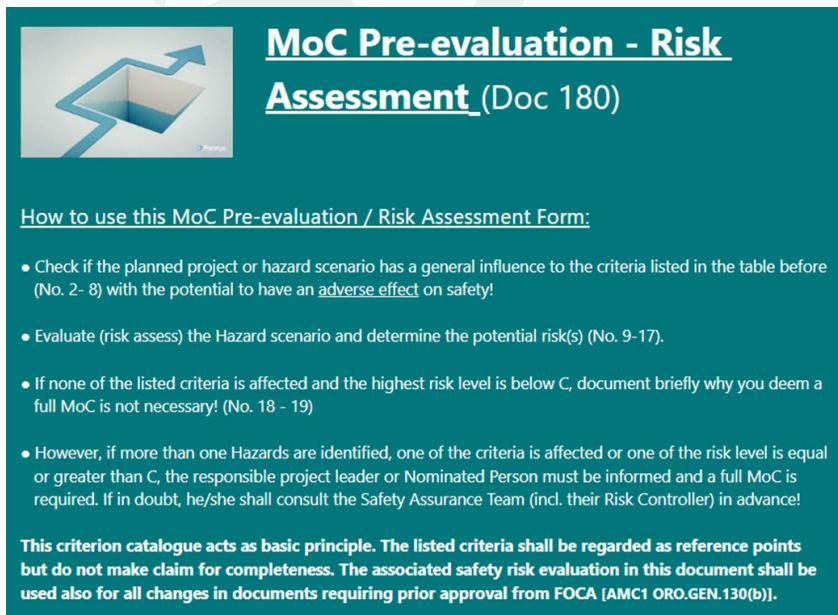
4.3.3 Risk Assessment

Risk assessment is an integral component of a risk management process. It involves an objective evaluation of the analysed risk. In other words, risk assessment facilitates the balancing act between assessed risks and viable risk mitigation.

As a formal and thorough risk assessment is time consuming, Edelweiss defined two steps of risk assessment:

4.3.3.1 "Light MoC": Pre-Evaluation Risk Assessment

A change management process is designed to ensure risk management is applied to any internal or external changes that have an adverse potential to negatively affect established operational processes, procedures, products and services. For all changes in documents requiring prior approval from FOCA a light MoC shall be performed. The Pre-Evaluation Risk Assessment (light MoC) is done in the manner of structured questionnaire, DOC 180 published in COSMOS → WORK → Arbeitsdokumente.



MoC Pre-evaluation - Risk Assessment (Doc 180)

How to use this MoC Pre-evaluation / Risk Assessment Form:

- Check if the planned project or hazard scenario has a general influence to the criteria listed in the table before (No. 2-8) with the potential to have an adverse effect on safety!
- Evaluate (risk assess) the Hazard scenario and determine the potential risk(s) (No. 9-17).
- If none of the listed criteria is affected and the highest risk level is below C, document briefly why you deem a full MoC is not necessary! (No. 18 - 19)
- However, if more than one Hazards are identified, one of the criteria is affected or one of the risk level is equal or greater than C, the responsible project leader or Nominated Person must be informed and a full MoC is required. If in doubt, he/she shall consult the Safety Assurance Team (incl. their Risk Controller) in advance!

This criterion catalogue acts as basic principle. The listed criteria shall be regarded as reference points but do not make claim for completeness. The associated safety risk evaluation in this document shall be used also for all changes in documents requiring prior approval from FOCA [AMC1 ORO.GEN.130(b)].

The first seven questions (No. 2 – 8) is a criterion catalogue which acts as basic principle. The listed criteria are predefined questions towards the “adverse effect of safety” concerning specific operational areas and shall be regarded as reference points but do not make claim for completeness. The final judgement whether an “impact of

safety" is adverse has to be evaluated by applying the company's risk assessment ([OMM Risk Matrix \(Level of Risk\)](#)). For this a Hazard ([OMM Hazard](#)) and an Undesired State ([OMM Undesired \(operational\) State](#)) has to be described. The applied risk evaluation on the possible Consequence ([OMM Consequence](#)) decides about the further steps. If the identified risk is "C", "B" or "A" the associated safety impact is considered being adverse and mitigation is necessary.

A full MoC via IQSMS has to be performed in one of the following cases:

- If at least one criterion is marked "YES" (Question No. 2-8).
- More than one Hazard ([OMM Hazard](#)) is identified.
- The identified risk is level "C" or higher ("B" or "A")

It is the responsibility of the Head of Department and/or Project Manager to identify the requirement for management of change, if necessary to organise and conduct the change management process ([PM 107 OS Change Management and Safety Assessment](#)) followed by a formal risk assessment.

If the decision is made to not perform a full MoC, the DOC 180 asks for a brief argumentation. (Question No. 19)

All data from a filed DOC 180 are stored in the safety department (OS) and serves as evidence of the performed pre-evaluation (performed risk assessment) in due time. On request, a single print out (pdf format) is available for any request from an external party (partners, LHG members, authorities, etc).

The Accountable Manager always has the right to order a full MoC evaluation.

4.3.3.2 Full MOC

Any risk assessment or evaluation has to be in a written form (EDW MoC). Edelweiss is using the IQSMS-System to document, store and list all MoC and their outcomes. The detailed process of performing a MoC is described in [PM 105 OS Management of Change](#). User guidance for the relevant steps inside the IQSMS is available as "IQSMS MoC Instruction Manual". Once the MoC is finished it has to be acknowledged by the risk owner(s). This ensures that the risk owner is aware of the identified risk. Furthermore, he acknowledges the defined mitigation and the associated impact (manpower, financial, time consumption, etc), as well as the necessity of checking their effectiveness. In general, all assessments and evaluations will have an expiry date set by the risk assessors. This expiry date shall be considered more as a reminder to review the conditions for the evaluation. If nothing is changed the evaluation can be easily extended again by any period deemed necessary by the reviewer.

Presently the maximum allowable review period is 5 years.

A special check period applies to risk assessment used for airport evaluations. If no indication asks for an earlier check the following schedule for reviewing the airport classification applies:

- Airport Class "A" every 5 years
- Airport Class "B" every 3 years
- Airport Class "C" every 2 years

An expired MoC is still valid but is waiting to be evaluated with the next opportunity.

A full MoC has to be performed when either the safety impact of a change is obviously adverse and necessary risk mitigations are very likely, the outcome of a light MoC via DOC 180 leads to a full MoC or the Accountable Manager asks for it.

4.3.3.3 Risk Mitigation

Where risk is concerned, there is no such thing as absolute safety.

Therefore, Edelweiss is following a strategy to lower identified risk to a level "as low as reasonably practicable" (ALARP), instead of avoiding them. Risks have to be managed to a level "as low as reasonably practicable" (ALARP). This means that the risk must be balanced against the time, cost and difficulty of taking measures to reduce or eliminate the risk.

"No Unacceptable Risk"

When the acceptability of the risk has been found to be unacceptable, control measures, so called mitigations, need to be introduced – **the higher the risk, the greater the urgency**. The level of risk can be lowered by reducing the severity of the potential consequences or by reducing the likelihood of occurrence. The optimum solution will vary depending on the local circumstances. In formulating meaningful safety action, an understanding of the adequacy of existing defences is required. Therefore, it is very important that involved risk assessor in a MoC are familiar with the subject and trained on internal risk assessment (evaluation) processes.

Once the mitigation is defined, it has to be implemented according to the timeline defined during the risk assessment and agreed by the risk owner(s). In general, head of departments or risk owners are accountable for implementing their particular mitigations in due time and check their effectiveness. Each individual department is responsible to keep their own overview over their mitigations.

All proposed risk mitigation derived from any risk assessment (MoC) or evaluation are stored in the Mitigation Database inside the IQSMS-System on the company's network. Each Mitigation automatically receives a unique identification number and is marked, whether the mitigation will become a future company standard or not.

All mitigations are accessible by the compliance department for audit preparation. Risk classifications "C" or less will be checked randomly during a scheduled audit by the compliance monitoring team. This is a compulsory item during the audit preparation ([PM 120 OSQ Internal Audit Program Preparation](#)). Mitigations concerning initial risk classifications "A" or "B" – time critical - will be inspected by the Risk Manager for proper implementation.

A detailed description about dealing with risk mitigations can be found in the [PM 118 OS Mitigation Processing](#).

4.3.4 Classification of Risks

A Safety risk is defined as the assessment, expressed in terms of predicted probability and severity, of the consequences of a hazard, taking as a reference the most foreseeable (most credible) situation. Typically, safety risks are designated through an alphanumeric convention (ref. Risk Matrix) that allows for their measurement. Using the example of crosswind below, it can be seen that the proposed definition of safety risk allows one to link safety risks with hazards and consequences, thus closing the loop in the hazard-consequence-safety risk trilogy:

- a wind of 15 knots blowing directly across the runway is a hazard;
- the potential for a runway lateral excursion because a pilot might not be able to control the aircraft during take-off or landing is one of the consequences of the hazard; and
- the assessment of the consequences of a runway lateral excursion, expressed in terms of probability and severity as an alphanumeric convention, is the safety risk.

There are many ways to approach the analytical aspects of risk analyses. Edelweiss has chosen an alphabetical approach in which capital letters (A - E) are allocated to the different levels of severity and likelihood. Any changes shall be discussed in the ME/SRB Meeting and must be approved by the Accountable Manager.

The following equation is used to determine a numerical risk index (RI) of any hazard identified:

$$\begin{array}{ccc} \text{Severity} & \times & \text{Probability} \\ \text{Classification} & & \text{Level} \\ \hline & = & \text{Risk Index} \\ & & \text{(RI)} \end{array}$$

4.3.4.1 Severity

Edelweiss Air Severity LEVEL	S5	S4	S3	S2	S1	S0
NATURE INJURY	Extreme	High	Medium	Low	Minor	None
Multiple fatalities and/or permanent disabilities with serious illness or health impairments.	Fatalities and/or permanent disability with serious illness or health impairment.	Serious but non-permanent injuries (e.g. loss time injury).	Injuries requiring medical first aid treatment only.	No or minor injuries (First aid treatment).		
NON-ROUTINE INCIDENTS (modified ICAO definition)	Total loss or hull loss.	Accident with serious injuries or fatalities, or significant damage to aircraft	Serious incident with injuries and/or substantial damage to aircraft	Incident with minor injury and/or minor aircraft damage.	Incident with discomfort and/or less than minor system damage.	None
PROPERTY OR A/C DAMAGE COST	> 100 Mio. CHF	20 Mio. CHF to 100 Mio. CHF	500.000 CHF to 20 Mio. CHF	50.000 CHF to 500.000 CHF	< 5000 CHF	None
REPUTATION AND PUBLIC CONFIDENCE	Fundamental change in the public perception of Edelweiss Air as a quality airline.	Extended nation-wide negative media coverage or international negative media coverage.	Short-term nation-wide negative media coverage.	Negative local media coverage.	None	None
CUSTOMER IMPACT	Extensive shut down of services for an extended period. All customers affected.	More than 40 flights cancelled, rescheduled or delayed. Thousands of customers affected.	Between 1 and 40 flights cancelled, rescheduled or delayed.	Between 2 and 5 flights rescheduled or delayed. Dozens of customers affected.	1 flight rescheduled or delayed. Small number of customers affected.	None
OPERATIONAL IMPACT	Fleet grounding for extended period.	Brief fleet grounding up to 2 days.	Aircraft grounding more than 2 days.	Aircraft grounding 4 to 48 hours.	Aircraft delay less than 4 hrs.	None
EQUIPMENT	Loss of critical equipment, shutdown of organization.	Major damage, results in major slowdown and/or downtime.	Minor damage, leads to organizational slowdown and/or minor downtime.	Minor damage, potential organizational slowdown and/or downtime.	No adverse consequences.	None
COMPLIANCE	Significant disruption to scheduled services over an extended period.	Substantial fine and disruption to scheduled services.	Substantial fine but no disruption to scheduled services.	No fine and no disruption to scheduled services.	Minor breaches by individual staff members.	None
PROCESS BREACH	Several steps of flight critical process not followed or flight critical process non-existent.	No steps of documented process followed or process non-existent.	Majority of steps of documented process not followed or process unknown.	Contiguous steps of documented process not followed or process partly unclear.	Some single steps of documented process not followed.	None
KNOW-HOW LOSS	Dramatic loss resulting in fully new build-up requiring more than 2 years.	Heavy loss resulting in substantial build-up and/or renewal requiring 1-2 years.	Worrying loss resulting in substantial build-up and/or renewal requiring up to 1 year.	Loss resulting in noticeable build-up and/or renewal requiring 3-6 months.	Slight loss that can be easily absorbed within the existing organization within 3 months.	None
SAFETY AWARENESS IGNORANCE	Intolerable total absence of safety awareness demanding immediate dismissal.	Unusually high level of safety awareness ignorance needing immediate correction or dismissal.	Unacceptable attitude toward safety awareness needing immediate correction or dismissal warning.	Generally acceptable attitude toward safety awareness with occasional blackouts needing pronounced and lasting correction.	Sound attitude toward safety awareness with occasional and isolated misjudgement needing clarification and lasting educational influence.	None
SECURITY	Attempted or Actual Breach of Flight Deck.	Life Threatening threat, the presence of a weapon determines the seriousness.	Physical abuse from the assailant. Grabbing, pushing, slapping, kicking another passenger or crew, deliberate damage to property etc. breaking of seats, destroying panel etc. Unruly behaviour of more than 2 people. Group of people showing collective unruly behaviour.	Intentional disorderly behaviour may be due to alcohol, drugs etc., abusive language used by passengers. Acts or body language confirming suspicious or threatening behaviour, smoking in lavatory.	Passenger is not following the Flight Crews instructions due to language barriers, lack of knowledge or inexperience etc.	None
FLIGHT CREW	Several Flight Crew Member are intentionally not following safety procedures. More than half of the Flight Crew is absent due to medical incident, injury etc.	Flight Crew Member is intentionally not following safety procedures. More than 1 Flight Crew Member is absent due to medical incident, injury etc.	Flight Crew Member is not following safety procedures. 1 Flight Crew Member absent due to medical incident, injury etc	Flight Crew Member is not following the predefined procedures.	NIL -----	None
MEDICAL INCIDENT PASSENGER	Multiple fatalities.	Permanent disabilities, fatalities, multiple affected people.	With need for Diversion, health professionals and opening the doctor's kit.	Medical Incident with urgent need for health professionals and the need for opening the doctor's kit.	Only minor medical Incident with need for opening the medical kit and monitoring of the sick person.	None

4.3.4.2 Probability (Likelihood)

The value of the Probability Classification shall be taken from the following table:

Probability LEVEL	Occurrences Edelweiss Air			One out of _____ flights	Probability (acc. LHG SMM)	Description
	Upper Boundary	Mean	Lower Boundary			
P5	Always	3,0 per week	Every 2 nd week	30 to 100	7,3 x 10E-03	Probability: Almost certain, very high. History: Significant history, has occurred many times and is considered most likely to happen in these circumstances. Context: has occurred innumerable times at EDW.
P4	Every 2 nd week	1,0 per month	4,0 per year	300 to 1.000	8,9 x 10E-04	Probability: Likely, high. History: History and will probably occur in most circumstances. Context: Has occurred many times at EDW.
P3	4,0 per year	2,0 per year	Every 2,0 years	300 to 9.000	1,1 x 10E-04	Probability: Possible, medium. History: Some history, has occurred occasional and is considered quite likely to happen in these circumstances. Context: Has occurred at EDW.
P2	Every 2,0 years	Every 4,0 years	Every 10 years	30.000 to 70.000	1,3 x 10E-05	Probability: Low, possible under certain circumstances. History: Some history and is considered possible in these circumstances. Context: Has occurred at EDW.
P1	Every 10 years	Every 30 years	Every 40 years	300.000 to 600.000	1,6 x 10E-06	Probability: Very low, unlikely. History: Has occurred rarely, has happened, but a credible statistic frequency is hard to establish. Context: Has occurred sporadic at EDW.
P0	Every 40 years	Every 250 years	Every 300 years	3.000.000 to 5.000.000	2,0 x 10E-07	Probability: Quite unlikely, rare. History: In most circumstances no history, but possible in exceptional circumstances. Context: Has occurred in the aviation industry.
Pe	Every 300 years	Every 2000 years	...	30.000.000 to 40.000.000	2,4 x 10E-08	Probability: Extremely unlikely, mishap basically impossible. History: No history and considered very unlikely to occur. Context: Not yet heard of in the aviation industry.

4.3.4.3 Risk Matrix (Level of Risk)

The calculated risk index will be evaluated using the following risk matrix.

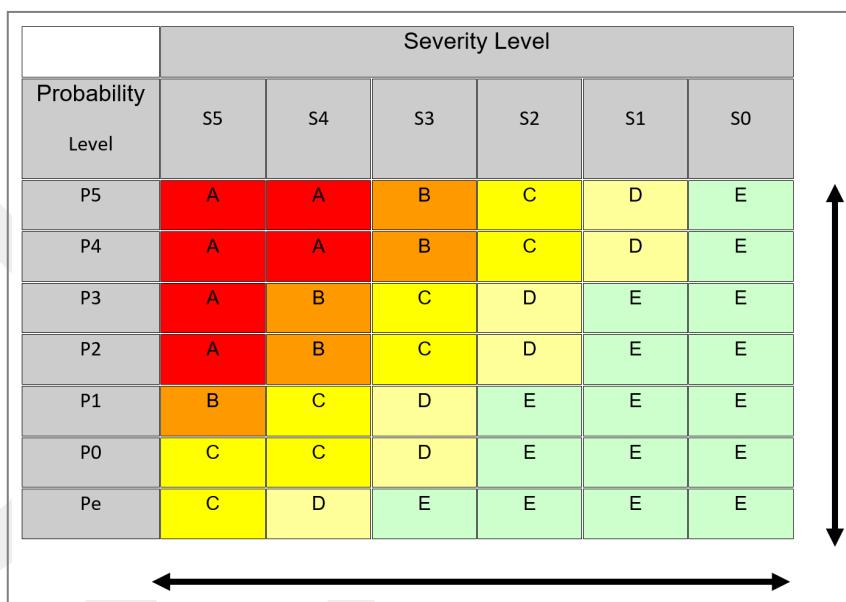
All the green (E) areas are considered as acceptable. No immediate action is required but further monitoring is appreciated.

The cream (D) and amber (C) shaded calls for a review of the risk mitigation currently in place and might require management involvement.

Areas coloured in orange (B) demand an immediate action to rectify the hazard.

Areas shown in red (A) require an immediate decision from management and might lead towards stopping the operation. Only limited time is acceptable to establish functional controls.

		Severity Level					
Probability Level		S5	S4	S3	S2	S1	S0
P5	A	A	B	C	D	E	
P4	A	A	B	C	D	E	
P3	A	B	C	D	E	E	
P2	A	B	C	D	E	E	
P1	B	C	D	E	E	E	
P0	C	C	D	E	E	E	
Pe	C	D	E	E	E	E	



4.3.4.3.1 Conversion of Risk Index to Risk Level

The conversion is based on the following tolerability table:

Risk Level	Risk Index	Risk	Risk Mitigation
A	$\geq 3,5$	Extreme	Unacceptable: Under the existing circumstances. Immediate risk mitigation required. (consider stopping operation!)
B	$2,5 < 3,5$	High	Unacceptable: Under the existing circumstances. short term risk mitigation required.
C	$1,5 < 2,5$	Moderate	Acceptable based on risk mitigation: It may require management decision. Long term improvement desired. (Mitigation shall be in place before project or planned process starts!)
D	$0,5 < 1,5$	Low	Acceptable but needs to be monitored: It may require risk mitigation.
E	$< 0,5$	Negligible	Acceptable: Collect data.

Risk Tolerability Table

Note: For risk-level C-A notification via e-mail to the Accountable Manager (ACM) required.

The conversion is only valid for the severity and probability tables and the corresponding risk matrix as stated in [OMM Risk](#), which is also used for the Management of Change

(MoC) and the LH Group ORE. As a result the "observed risk" may be compared to the "predictive" risk resulting from a full MoC.

4.3.4.3.2 Time-Reference Table for Action Planning

Edelweiss currently does not have a time-reference table for action planning and will define it at a later stage.

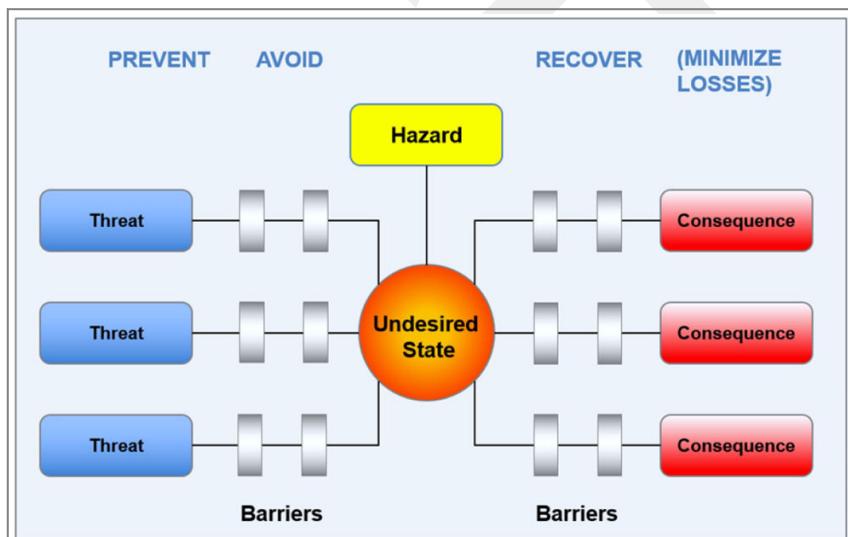
4.3.5 Bow Tie Model

All identified hazards from the collected data will be subjected to the risk assessment process as described in the [PM 105 OS Management of Change](#) and [PM 117 OS Safety Issue Risk Assessment](#). If any further advice is necessary to determine the risk, the Safety Manager may invite additional experts (safety commissioners) as he/she deems necessary.

The newly created risk assessment team (all subject matter experts) has the task to develop and visualise the current risk situation concerning the identified hazard. A great method is the so-called "Bow Tie Model" based on asking a structured set of questions in a logical sequence. The complete Bow Tie Model illustrates the identified hazard with an undesired state, the safety events and consequences and the safety controls put in place to minimise the risk.

In the Bow Tie methodology there are preventive or proactive barriers (on the left side of the undesired state) that prevent the undesired state from happening. There are also corrective or reactive controls (on the right side of the undesired state) that prevent the undesired state from resulting into unwanted outcomes or reduce the consequence severity of the outcomes.

4.3.5.1 The Bow Tie Elements in Detail



4.3.5.1.1 Hazard

A hazard is defined as a condition, activity or an object with the potential to cause injuries to personnel, damage to equipment or structures, loss of material, or reduction of ability to perform a prescribed function.

A hazard can be focused on:

- a condition (e.g. icing conditions),
- an object (e.g. another vehicle), or
- an activity (e.g. driving).

For example “driving a car on a busy motorway” – this is an activity where risks are present.

4.3.5.1.2 Undesired (operational) State

The undesired state describes the point where the hazard is no longer under adequate control. It is usually what is considered to be an unsafe state that is not yet an accident.

Therefore, top events - while not being disasters themselves - have the potential to become disasters if nothing is done to control them.

In the driving a car on a busy motorway example, the top event could be described as “losing control of the car”.

4.3.5.1.3 Threat

A possible direct cause that will potentially release a hazard by producing a top event.

In the example of driving a car on a busy motorway, a threat would be “tire blow out”.

4.3.5.1.4 Consequence

A potential event resulting from the release of a hazard, which directly results in loss or damage.

In the driving a car on a busy motorway example, a consequence would be “collision with another vehicle resulting in serious injury or fatalities”.

4.3.5.1.5 Prevention Control (Barrier)

Any measure taken which acts against some undesirable force or intention, in order to maintain a desired state.

In the example of driving a car on a busy motorway, to eliminate the threat of a “tire blow out”, the car owner would “conduct regular tire inspections” to identify any potential issues that lead to a tire blow out.

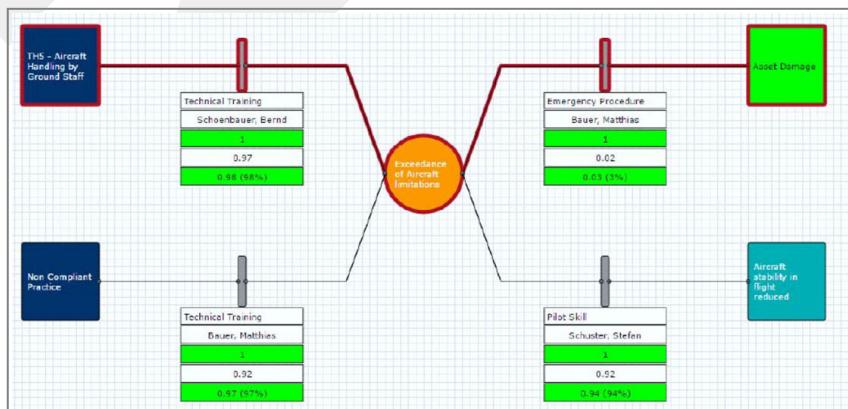
4.3.5.1.6 Recovery Control (Barrier)

These controls are considered to reduce the likelihood of the undesired state developing into a consequence as well as mitigating the severity of the consequence.

In the example of driving a car on a busy motorway, a reduction control would be a anti-lock braking system (ABS) to constrain the loss of control parameters to not affect other motorway users. A mitigating control could be airbag activation acting against the fatality severity of the consequence.

4.3.5.2 SIRA Risk Management Concept in IQSMS

The goal of IQSMS's risk management function is to automatically alert the organisation, when predefined safety controls are falling below effectiveness of the controls. The data taken for the calculation derives from the control analysis when an occurrence is actually happening, as identified in the IQSMS Reporting Module. The module enables to create company specific and customized main processes and corresponding sub processes. For each (sub)process, an unlimited number of Bow Tie models can be created.



4.3.6 Event Severity Classification

The purpose of the Event Severity Classification (ESC) is to allow an initial classification of any event information on a standardised basis. It does not replace a risk assessment, as described in OMM Classification of Risks because it does not consider the number of events as well as the number of flights without events. It therefore considers only the likelihood of the remaining barriers failing, not the probability of the event itself or the overall probability of the worst foreseeable outcome happening. While the sum of all event severity classifications indicates the "historic" amount of risk which was taken, a risk assessment of the underlying hazards and risks is additionally required to allow predictive risk management and to distinguish between acceptable, tolerable and unacceptable risks.

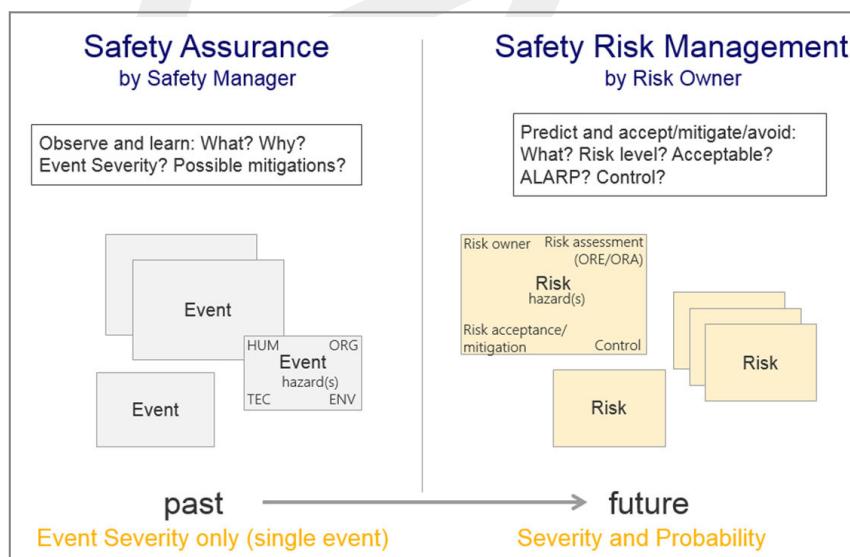
As the ESC method is a single event/incident severity classification, it applies predominantly to FDM reporting and investigation.

For any risk evaluation of potential future risks, a risk classification in accordance with [OMM Classification of Risk](#) shall be performed.

4.3.6.1 Handling of Event Severity Classification (ESC)

4.3.6.1.1 Motivation

With start of implementation of SMS in 2008 European wide, it was recognised that managing risk is a crucial part of the SMS. While describing the acceptable level of a risk with various risk matrix tailored to the company's size it became obvious that this method does not provide the correct and full picture. Once an event or incident became known in the company, the risk matrix was applied as a reactive step in order to provide a possible outlook into the future with the assumed possibility of re-occurrence of such (or similar) event. With this reactive view, stating the probability was easy as the occurrence truly happened. The probability is always 100%. After searching in the company's safety database for similar events, a statement of the expected probability for the future could be made. However, such assumption of probability became almost impossible when an event or incident was confirmed as a single occurrence.



To avoid this problem Edelweiss, as many other safety departments, distinguished in the past between "proposed" severity and "actual" severity. This has been accepted by the industry as an acceptable workaround. Triggered by the implementation of the EU Regulation 376/2014 a classification method for single occurrence must be in place, regardless of the proactive perspective. A statement about the severity of the occurrence must be provided with a standardised method by submitting any occurrence to EICAIRS in

the ADREP-Classification. A solution to this problem is the method of the ARMS Group, known as Event Severity Classification (ESC). This method has been adjusted to the Edelweiss Risk Matrix.

The decision on how to handle an event may be based on the ESC result. If ESC indicates that further actions and/or an investigation is required, usually a risk assessment (MoC) needs to be updated (or performed).

4.3.6.1.2 Event Severity Classification Matrix

The event severity classification is done according to the event severity classification matrix in the IQSMS “Reporting Module” or IQSMS “FDM Risk Module” via the button “Risk Assessment”. For the conversion of the event severity classification matrix to the ARMS values refer to chapter 9. Lower severities than “i” may be used for calculation purposes.

Event Severity Classification Matrix	Question 2: What was the effectiveness of the remaining barriers between this event and the most credible accident scenario E0 to E12? (answer below)												
	None		Not effective 90%		Minimal 99%		Limited 99,9%		Effective 99,99%		Very effective 99,999		
	E0	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	E11	E12
Alternative Question 2: What is the likelihood that this event leads to the most credible accident scenario?													
1 out of 1	1 out of 3	1 out of 10	1 out of 30	1 out of 100	1 out of 300	1 out of 1.000	1 out of 3.000	1 out of 10.000	1 out of 30.000	1 out of 100.000	1 out of 300.000	1 out of 1 mio.	
Loss of aircraft or multiple fatalities (3 or more) Catastrophic Accident (S5) – A5	a	a	a	a-b	b	b-c	c	c-d	d	d-e	e	e-f	f
Several fatalities, multiple serious injuries, serious damage to the aircraft (almost lost) Serious Accident (S4 – S5) – A4	a	a-b	b	b-c	c	c-d	d	d-e	e	e-f	f	f-g	g
1 or 2 fatalities, multiple serious injuries, major damage to the aircraft Major Accident (S4) – A3	b	b-c	c	c-d	d	d-e	e	e-f	f	f-g	g	g-h	h
Serious incident with injuries and/or substantial damage to aircraft Serious Incident (S3) – A2	c	c-d	d	d-e	e	e-f	f	f-g	g	g-h	h	h-i	i
Incident with injuries and/or damage to aircraft Incident (S2 – S3) A1	d	d-e	e	e-f	f	f-g	g	g-h	h	h-i	i		
Minor injuries, minor damage to aircraft Minor Injuries or damage (S2) – A0	e	e-f	f	f-g	g	g-h	h	h-i	i				
Incident with discomfort Incident with discomfort and/or less than minor system damage (S1) – A0	f	f-g	g	g-h	h	h-i	i						

4.3.6.1.3 Verbal Meaning of the Event Severity Classification (German and English)

If it is not possible to determine the effectiveness of the remaining barriers between the event and the most credible accident scenario, a verbal definition of the event severity may be used instead. The event is described answering the following question: How do you describe the event severity verbally?

German	English	Event severity
gerade nochmal gutgegangen oder starke Beschädigung/Unfall	close call/near miss or major damage, accident	a
sehr heftig	very heavy stuff	b
heftig	heavy stuff	c
ernstzunehmend	take seriously	d
interessant (evtl. Vorsicht)	interesting	e
nice to know (evtl. erwähnenswert)	nice to know	f
Risiko nicht signifikant erhöht, Einzelevent nicht safety-relevant	no significant additional risk, single event not safety relevant	g to i

Verbal definition of event severities

Intermediate severities, e.g. a-b, may be derived by interpolation.

4.3.6.1.4 Explanation of Event Severity Classification (ESC)

The main objective of event severity classification is to act as the first screening of all incoming safety data and to identify when urgent action is necessary. This type of screening is necessary whatever methodology is later used for risk assessment.

Typically, the event severity classification should take place preferably within one or two days of the event and be carried out by a person with operational experience who has been trained in event severity classification.

The event severity classification is based on the concept of “event-based severity”, which is an assessment of the severity associated with that one event and not the risk associated with all similar events. It should be kept in mind that the event severity classification may only be the first step in the risk assessment process and may be revised as a result of any investigation.

The event severity classification result is based on two questions:

1. If this event had escalated into an accident, what would have been the most credible accident outcome?
2. What was the effectiveness of the remaining barriers between this event and the most credible accident outcome?

It is worth noting that:

- The first question is looking to identify the accident outcome that is of most concern when this type of incident occurs. Or, put in another way, ‘what is the accident I am trying to avoid by having these incidents reported?’ This question is not asking for the most probable outcome, as that is usually “nothing” and therefore ignores any risk that the event carries. But neither is it necessarily looking for the worst possible outcome as the worst-case scenario would often not be the most obvious accident to expect. For example, a low speed runway overrun or a ground collision during taxiing would be an accident but seldom one with 100% fatalities.

- There is likely to be some subjectivity between users in the answer to the first question depending upon how they consider the factors causing the event. However, that variation is dealt with in question two through consideration of the remaining barriers, and hence the probability of that accident outcome. The severities in the event severity classification are intended to ensure that any variation in approach produces similar outputs in terms of risk.
- In the longer term it is likely that organisations will identify the outcomes associated with types of events and hence remove the subjectivity associated with the first question for most incidents. Alternatively some users may wish to consider multiple outcomes, this, however, is beyond the scope of the initial assessment of an event.
- The second question only considers remaining barriers – to estimate the probability of further escalation into the most credible accident outcome (of question 1). The barrier, which stopped the escalation, will be counted in (because it was still in place) along with any others that are believed to still remain. The already failed barriers will be ignored.
- It is recognised that there is still subjectivity in the answer to the second question and that expert knowledge will still be required to make an accurate categorisation. It is likely that some organisations will choose to develop methods to reduce this subjectivity.
- The reference in this analysis has to be an accident, because risk assessment only makes sense in relation to an accident. It does not change the fact that we manage incidents that are not actually accidents. It just recognises the fact that, to measure the risk associated with incidents, they need to be referenced to the accident outcome. In some cases, the reference accident could be so minor that it would not qualify as an accident according to the ICAO definition. This explains the adopted use of the term “accident outcome”.

The event severity classification is performed by use of the ESC matrix.

The following guidance helps in making coherent event severity classifications.

Question 1: “If this event had escalated into an accident, what would have been the most credible accident outcome?”

- In your mind, try to escalate the event into an accident outcome.
- If it was virtually impossible that the event could have escalated into an accident outcome, then you are at the bottom row with event severity “f”.

- If you can imagine credible accident scenarios (even improbable ones!), then consider the most credible scenario and judge its typical consequence and pick the corresponding row in the matrix. The listed “typical accident scenarios” in the first column of the ESC-matrix can be of help.

Question 2: “What was the effectiveness of the remaining barriers between this event and the most credible accident outcome?”

- To access the remaining “safety margin”, consider both the number and robustness of the remaining barriers between this event and the accident scenario in question 1.
- Barriers that already failed are being ignored. Only the barrier which worked and any subsequent barriers still in place are taken into account. For the vertical column selection, you should pick:
 - The extreme left column if the only thing separating the event from an accident was pure luck or exceptional skill, which is not trained nor required.
 - The E4 column if some barrier(s) were still in place but their total effectiveness was “minimal” – e.g. this could be a GPWS warning just before an imminent CFIT.
 - The E6 column if the effectiveness of the barrier(s) was “limited”. Typically, this is an abnormal situation, more demanding to manage, but with still a considerable remaining safety margin – e.g. a moderate error in the load sheet or loading vs. slight rotation problems at take-off.
 - The E8 column if the safety margin was “effective”, typically consisting of several good barriers – e.g. passenger smoking in the lavatory versus in-flight fire accident.

Alternative Question 2: “What is the likelihood that this event leads to the most credible accident scenario?”

- This question is addressing the likelihood that the event results in the most credible accident scenario. It is a conditional likelihood. It is only valid under the condition that the event takes place. The probability of the event itself is not taken into account. It is also called the “Übergangswahrscheinlichkeit”.

1. The risk associated with all similar events is called “risk A, B, C, D or E”. Similar means that all events are the result of the same hazard.

2. Multiple outcomes are considered in a Management of Change (MoC).

It is good to keep in mind that the available information about the event at this stage may be limited and the event severity classification is performed based on this limited information.

4.3.6.1.5 Output of the Event Severity Classification

The event severity classification has two outputs.

The first output is a recommendation on what should be done about the event (e.g. an investigator based on his/her own judgment, sometimes decide on a higher classification than the event severity classification would indicate).

Event Severity	Accident and Incident Investigation-Team (Occurrence Report)	FODA/FDM-Team (FODA Event/FDM Event)	Safety Assurance-Team	Safety Promotion Team	Optional for GRD related report	Optional for MAINT related report	Group Safety
a, a-b	Investigate immediately and take action	Check Occurrence Report or CHFR, consider event for quarterly report (especially if ORG error)	Update or add hazard in hazard registry, update bow tie, perform or update risk assessment (ORE), present in ME/SRB	Presentation for seminars and safety meetings if recommended, publish in monthly safety and quality (S&Q) notice	Report processing immediately – INV/ORE (SAG/Fleet impact?)	Send information about event to Group Safety Pilot	
b							
b-c	Investigation candidate and take action if required				Investigate and take action (Investigation Team)		
c, c-d							
d, d-e	Potential investigation candidate, use for continuous improvement	Optionally check FR/CSR or request trusted pilot, may be mentioned in report	May be used for SPIs	Use is optional (typically if HUM error is involved)	Request investigation by station management, use for continuous improvement,		
e, e-f	Flows into the database	May be used for campaigns (e.g. medium FODA/ FDM event severity)	Monitor	Optional	Copy report to station management	Confirm ESC	
f to i	Categorize report in reporting system (IQSMS)						
no ESC possible	Mark report as "hazard report" (only possible event is reported) or "not safety relevant" (normal report, not a classic air safety report)						

The second output of the event severity classification is a number, called the event severity index.

Event severity	Event severity index ESI (logarithmic scale)	Risk Units (RU) (linear scale)	Likelihood of catastrophic accident (S5) provided event occurs (probability scale)
a	4	$10^2 = 100$	$\geq 10^{-1}$
a-b	3,5	$10^{1,5} \approx 31,6227766$	$10^{-1,5}$
b	3	$10^1 = 10$	10^{-2}
b-c	2,5	$10^{0,5} \approx 3,16227766$	$10^{-2,5}$
c	2	$10^0 = 1$	10^{-3}
c-d	1,5	$10^{-0,5} \approx 0,316227766$	$10^{-3,5}$
d	1	$10^{-1} = 0,1$	10^{-4}
d-e	0,5	$10^{-1,5} \approx 0,0316227766$	$10^{-4,5}$
e	0	$10^{-2} = 0,01$	10^{-5}
e-f	-0,5	$10^{-2,5} \approx 0,00316227766$	$10^{-5,5}$
f	-1	$10^{-3} = 0,001$	10^{-6}
f-g	-1,5	$10^{-3,5} \approx 0,000316227766$	$10^{-6,5}$
g	-2	$10^{-4} = 0,0001$	10^{-7}
g-h	-2,5	$10^{-4,5} \approx 0,0000316227766$	$10^{-7,5}$
h	-3	$10^{-5} = 0,00001$	10^{-8}
h-i	-3,5	$10^{-5,5} \approx 0,00000316227766$	$10^{-8,5}$
i	-4	$10^{-6} = 0,000001$	10^{-9}

Event Severity Index

This event severity index gives a quantitative relative event severity value and is very useful in compiling statistics. In the proposed event severity classification matrix, the severity indices run from -1 to 4 and are on a logarithmic scale. The conditional accident probability indicates the probability of a catastrophic accident (S5) provided the event (re-)occurs. The Risk Units (RU) are on a linear scale and may therefore be added to aggregate the total risk of an event type or of an airline using the total (non-conditional) risk matrix. By definition 1000 RU equal one (virtual) accident. If for example the total risk matrix indicates that the risk budget of an airline is limited to one accident every 10 years (which equals 1.000 RU in 10 years), a maximum sum of 100 RU is allowable in a one year period.

The ESI may be calculated from the most credible accident scenario (An/A0 to A5, An equals -1) and the effectiveness of the remaining barriers (E0 to E12) between from the Event Severity Classification Matrix.

$$ESI = (A) - 0,5 \cdot (E)$$

The Risk Units may be calculated from the ESI

$$RU = 10^{(ESI - 2)}$$

If there are several possible “accident outcome” scenarios that can be imagined, use the event severity classification process on each and pick the one that returns the highest event severity index.

4.3.6.1.6 Event Severity Classification in Reporting Tools

The event severity classification is integrated in the IQSMS reporting tool.

4.3.6.1.7 Conversion of the ESC Matrix to ARMs ERC

The results of the ESC-Matrix may be converted to the proposed practical ERC application, a 4x4 matrix, as illustrated below:

Question 2				Question 1		Typical accident scenarios
What was the effectiveness of the remaining barriers between this event and the most credible accident scenario?				If this event had escalated into an accident outcome, what would have been the most credible outcome?		Typical accident scenarios
Effective	Limited	Minimal	Not effective	Catastrophic Accident	Loss of aircraft or multiple fatalities (3 or more)	
50	102	502	2500	Major Accident	1 or 2 fatalities, multiple serious injuries, major damage to the aircraft	
10	21	101	500	Minor Injuries or damage	Minor injuries, minor damage to aircraft	
2	4	20	100	No accident outcome	No potential damage or injury could occur	
1				Any event which could not escalate into an accident, even if it may have operational consequences (e.g. diversion, delay, individual sickness)		

Practical ERC Matrix according ARMs

The ERC has two outputs.

The first output is a recommendation on what should be done about the event.

- | | |
|--|---|
| | → Investigate immediately and take action. |
| | → Investigate or carry out further Risk Assessment |
| | → Use for continuous improvement (flows into the Database). |

Interpretation of ERC matrix results

The second output of the ERC is a number, called the ERC risk index.

ESC event severity	ERC risk index	ARMs recommendation
a	2500	Investigate immediately and take action
a-b	1000*	
b	500	
b-c	200*	
c	100	
c-d	40*	Investigate or carry out further risk assessment
d	20	
d-e	6*	
e	2	Use for continuous improvement (flows into database)
f - i	1	

* interpolated

Conversion ESC to ARMs

4.3.6.1.8 Conversion of the ESC Matrix to the ERCS Matrix

In order to make occurrence reports comparable, a common European Risk Classification scheme (ERCS) was set up. This scheme is only applicable for competent authorities (Member States and EASA). As from the adoption of the European Risk Classification Scheme, competent authorities are required to use it to review and classify the risk of occurrences they collect (REGULATION (EU) NO 376/2014 Article 7(2)).

The ERCS is defined in the “COMMISSION DELEGATED REGULATION (EU) 2020/2034 of 6 October 2020 supplementing Regulation (EU) No 376/2014 of the European Parliament and of the Council as regards the common European risk classification scheme”.

According to the Annex of the regulation, the ERCS consists of the same two steps as the ESC:

1. Determination of the values of the two variables: severity and probability,
2. Scoring of the safety risk within the ERCS matrix based on the two determined values of variables.

Therefore, the ESC can be applied and transferred to the ERCS values.

SEVERITY		CLASSIFICATION (ERCS Score)										
Potential Accident Outcome	Score											
Extreme catastrophic accident with the potential for significant number of fatalities (100+)	X	X9	X8	X7	X6	X5	X4	X3	X2	X1		X0
Significant accident with potential for fatalities and injuries (20-100)	S	S9	S8	S7	S6	S5	S4	S3	S2	S1		S0
Major accident with limited amount of fatalities (2-19), life changing injuries or destruction of the aircraft	M	M9	M8	M7	M6	M5	M4	M3	M2	M1		M0
An accident involving single individual fatality, life changing injury or substantial aircraft damage	I	I9	I8	I7	I6	I5	I4	I3	I2	I1		I0
An accident involving minor and serious injury (not life changing) or minor aircraft damage	E	E9	E8	E7	E6	E5	E4	E3	E2	E1		E0
No likelihood of an accident	A	No Implication to Safety										
	Corresponding Barrier Score	9	8	7	6	5	4	3	2	1		0
	Barrier Weight Sum	17-18	15-16	13-14	11-12	9-10	7-8	5-6	3-4	1-2		0
PROBABILITY OF THE POTENTIAL ACCIDENT OUTCOME												

ERCS Matrix

As organisations can use their own risk classification, Edelweiss, as agreed within the Lufthansa Group, uses the ESC in order to gain compatibility to the operational risk assessment method. The ESC as well as the ERCS is based on the same methodological approach, so a conversion table from the ESC to the ERCS is possible.

Each ERCS score is assigned a corresponding numerical value of risk magnitude to facilitate the aggregation and numerical analysis of multiple occurrences with an ERCS score:

ERCS Score	X9	X8	X7	X6	X5	X4	X3	X2	X1	X0
ERCS Corresponding numerical value	1,0E-03	1,0E-02	1,0E-01	1,0E+00	1,0E+01	1,0E+02	1,0E+03	1,0E+04	1,0E+05	1,0E+06
ESC Risk Units	1,0E-06	1,0E-05	1,0E-04	1,0E-03	1,0E-02	1,0E-01	1,0E+00	1,0E+01	1,0E+02	1,0E+03
ESC Event severity index ESI	-4,0	-3,0	-2,0	-1,0	0,0	1,0	2,0	3,0	4,0	5,0
ESC Event Severity	i	h	g	f	e	d	c	b	a	a
ERCS Score	S9	S8	S7	S6	S5	S4	S3	S2	S1	S0
Corresponding numerical value	5,0E-04	5,0E-03	5,0E-02	5,0E-01	5,0E+00	5,0E+01	5,0E+02	5,0E+03	5,0E+04	5,0E+05
ESC Risk Units	5,0E-07	5,0E-06	5,0E-05	5,0E-04	5,0E-03	5,0E-02	5,0E-01	5,0E+00	5,0E+01	5,0E+02
Event severity index ESI	-4,3	-3,3	-2,3	-1,3	-0,3	0,7	1,7	2,7	3,7	4,7
ESC Event Severity	i	h-i	g-h	f-g	e-f	d-e	c-d	b-c	a-b	a
ERCS Score	M9	M8	M7	M6	M5	M4	M3	M2	M1	M0
Corresponding numerical value	1,0E-04	1,0E-03	1,0E-02	1,0E-01	1,0E+00	1,0E+01	1,0E+02	1,0E+03	1,0E+04	1,0E+05
ESC Risk Units	1,0E-07	1,0E-06	1,0E-05	1,0E-04	1,0E-03	1,0E-02	1,0E-01	1,0E+00	1,0E+01	1,0E+02
Event severity index ESI	-5,0	-4,0	-3,0	-2,0	-1,0	0,0	1,0	2,0	3,0	4,0
ESC Event Severity	i	i	h	g	f	e	d	c	b	a
ERCS Score	I9	I8	I7	I6	I5	I4	I3	I2	I1	I0
Corresponding numerical value	1,0E-05	1,0E-04	1,0E-03	1,0E-02	1,0E-01	1,0E+00	1,0E+01	1,0E+02	1,0E+03	1,0E+04
ESC Risk Units	1,0E-08	1,0E-07	1,0E-06	1,0E-05	1,0E-04	1,0E-03	1,0E-02	1,0E-01	1,0E+00	1,0E+01
Event severity index ESI	-6,0	-5,0	-4,0	-3,0	-2,0	-1,0	0,0	1,0	2,0	3,0
ESC Event Severity	i	i	i	h	g	f	e	d	c	b
ERCS Score	E9	E8	E7	E6	E5	E4	E3	E2	E1	E0
Corresponding numerical value	1,0E-06	1,0E-05	1,0E-04	1,0E-03	1,0E-02	1,0E-01	1,0E+00	1,0E+01	1,0E+02	1,0E+03
ESC Risk Units	1,0E-09	1,0E-08	1,0E-07	1,0E-06	1,0E-05	1,0E-04	1,0E-03	1,0E-02	1,0E-01	1,0E+00
Event severity index ESI	-7,0	-6,0	-5,0	-4,0	-3,0	-2,0	-1,0	0,0	1,0	2,0
ESC Event Severity	i	i	i	i	h	g	f	e	d	c

To calibrate the scales the "numerical value of risk magnitude" of X0 is used:

- In the ECRS 'X' stands for an “extreme catastrophic accident with the potential for significant number of fatalities”
- In the ECRS '0' stands for “no barriers” left which means worst likely accident outcome realised
- Corresponding ERCS numerical value of X0 is 10^6 (see table above)
- Therefore, an event which leads to an extreme catastrophic accident outcome the ERCS numerical value 10^6 (ENV)
- The same event has an ESC value of 1000 RUs
Therefore 10^6 ENV = 10^3 RU or 10^3 ENV = 1 RU or 1 ENV = 0.001 RU.

The ENV purpose is to “facilitate the aggregation and numerical analysis of multiple occurrences”. Therefore, it may be assumed that ENV values can be added and that 10×0.1 ENV equals 1 ENV.

The following ESC matrix includes the corresponding ERCS scores:

Event Severity Classification Matrix with ERCS score	Question 2: What was the effectiveness of the remaining barriers between this event and the most credible accident scenario E0 to E12? (answer below)												
	None		Not effective 90%		Minimal 99%		Limited 99,9%		Effective 99,99%		Very effective 99,999%		
	E0	E1	E2	E3	E4	E5	E6	E7	E8	E9	E10	E11	
	1 out of 1	1 out of 3	1 out of 10	1 out of 30	1 out of 100	1 out of 300	1 out of 1,000	1 out of 3,000	1 out of 10,000	1 out of 30,000	1 out of 100,000	1 out of 300,000	
Alternative Question 2: What is the likelihood that this event leads to the most credible accident scenario?													
Loss of aircraft or multiple fatalities (3 or more) Catastrophic Accident (S5) – A5	X0 a	X0 a	X1 a	X1 a-b	X2 b	X2 b-c	X3 c	X3 c-d	X4 d	X4 d-e	X5 e	X5 e-f	X6 f
Several fatalities, multiple serious injuries, serious damage to the aircraft (almost lost) Serious Accident (S4 – S5) – A4	S0 a	S1 a-b	S1 b	S2 b-c	S2 c	S3 c-d	S3 d	S4 d-e	S4 e	S5 e-f	S5 f	S6 f-g	S6 g
1 or 2 fatalities, multiple serious injuries, major damage to the aircraft Major Accident (S4) – A3	M1 b	M1 b-c	M2 c	M2 c-d	M3 d	M3 d-e	M4 e	M4 e-f	M5 f	M5 f-g	M6 g	M6 g-h	M7 h
Serious incident with injuries and/or substantial damage to aircraft Serious Incident (S3) – A2	I1 c	I1 c-d	I2 d	I2 d-e	I3 e	I3 e-f	I4 f	I4 f-g	I5 g	I5 g-h	I6 h	I6 h-i	I7 i
Incident with injuries and/or damage to aircraft Incident (S2 – S3) A1	E1 d	E1 d-e	E2 e	E2 e-f	E3 f	E3 f-g	E4 g	E4 g-h	E5 h	E5 h-i	E6 i	E6 i	E7 i
Minor injuries, minor damage to aircraft Minor Injuries or damage (S2) – A0	E2 e	E2 e-f	E3 f	E3 f-g	E4 g	E4 g-h	E5 h	E5 h-i	E6 i	E6 i	E7 i	E7 i	E8 i
Incident with discomfort Incident with discomfort and/or less than minor system damage (S1) – A0	A f	A f-g	A g	A g-h	A h	A h-i			A i				

ESC Matrix with ECRS Scores

The ECRS scores are used by Edelweiss when transmitting the risk classification result of each event to the competent authority according regulation (EU) 2020/2034.

4.3.6.1.9 Conversion Aggregated ESC Risk Units to Risk Level

Risk units, which are observed over a specific time period may be aggregated and converted to a Risk Index by the following formula. The number of relevant flights are all relevant flights in the specified time period (with or without events).

Risk Index = $0,266 * \ln(\text{Sum(RUs}^1)/\text{flights}) + 4,74$

¹ Sum of all Risk Units (RUs) of the relevant flights in the time period

The resulting Risk Index may be considered as the “observed risk” of a specific time period. It may be used as a SPI for safety assurance.

Note: It only reflects the “expected risk” if:

- the events are independent,
- the events are identically distributed, which means there is no major change,
- the ESC is not biased, and
- it is assumed that at least the high severity events are reported and therefore the data collected give the full picture of the risk situation.

4.3.6.1.9.1 Calculation of the Risk Budget

To meet the minimum LHG safety standard according to the LHG SMM the following applies:

- The maximum tolerable risk level is „C“, (refer to tolerability table below)
- $C = S5/P0$, (proactive risk matrix, see below)
- $S5$ = total loss (severity table, see below)
- $P0 = 2e^{-7}$, (probability table, see below)
- One divided by $2e^{-7}$ is 5.000.000,
- Result: the risk budget maximum is one total loss per 5 Mio. flights.

1000 RU equal by definition one total loss (see above).

The maximum annual risk budget depends on the number of flights per year as follows:

- Risk Budget per year = (flights per year) * $P0 * RU/\text{total loss}$
- Risk Budget per year = (flights per year) * $2e^{-7} * 1.000$
- Risk Budget per year = (flights per year) * $2e^{-4}$
- Risk Budget per year [in RU] = (flights per year) / 5.000

Example: If Edelweiss has 125.000 flights per year the risk budget is 25 RU per year.

4.3.6.1.9.2 Risk Level of Specific Risk Owners

The Risk Index of a specific risk owner may be calculated, too. In this case only the RUs of the specific risk owner are considered (e.g. flight ops). Additionally the risk budget has to be taken into account by means of a value relative Risk Budget, which is above 0 and up to 1. It reflects the relative amount of allowable risk budget of the specific risk owner in relation to the total risk budget of the organisation:

Risk Budget = Total Risk Budget / Risk Budget Risk Owner.

This risk index of the risk owner is calculated by the formula:

Risk Index Risk Owner = $0,266 * \ln(\text{Sum(RUs}^1)) / \text{flights} / \text{Risk Budget} + 4,74$

¹ Sum of all Risk Units (RUs) of the relevant flights in the period

A possible distribution according the Nominated Persons Flight Operations, Ground Operations, Maintenance, and Training are in the following table. The table is a rough estimate and based on operational experience.

Risk Owner	Risk Budget
Flight (incl. Cabin and Training)	0,45
Maintenance	0,40
Ground	0,15

Estimates for relative amount of allowable risk budget

4.4 Investigation of Accidents and Serious Incidents

4.4.1 Definitions

Incident

An incident is an occurrence, other than an accident, associated with the operation of an aircraft which affects or could affect the safety of operation.

Serious incident

A serious incident is an incident involving circumstances indicating that an accident nearly (high probability) occurred.

Accident

The Swiss Transportation Safety Investigation Board (STSB) defines an accident (in accordance with ICAO Annex 13) as an occurrence associated with the operation of an aircraft, which takes place between the time when any person boards the aircraft with the intention of flight and such time as all persons have disembarked, from in which:

1. any person suffers death or serious injury while in or on the aircraft or by direct contact with any part of the aircraft (including any part which has become detached from the aircraft) or by direct exposure to jet blast, except when the death or serious injury is from natural causes, is self-inflicted or is inflicted by other persons or when the death or serious injury is suffered by a stowaway hiding outside the areas normally available in flight to passengers and members of the crew of the aircraft; or
2. the aircraft incurs damage or structural failure, which adversely affects its structural strength, performance or flight characteristics and which would normally require major repair or replacement of the affected component, other than:
 - a. engine failure or damage, when the damage is limited to the engine, its cowling or accessories,
 - b. damage limited to propellers, wing tips, antenna, tyres, brakes, fairings, small dents or punctured holes in the aircraft skin; or
3. the aircraft is missing or is completely inaccessible.

Serious injury

Serious injury means an injury that is sustained by a person in an accident and which:

- requires his/her stay in hospital for more than 48 hours commencing within seven days from the date on which the injury was received; or
- results in a fracture of any bone (except simple fractures of fingers, toes or nose); or
- involves lacerations which cause nerve muscle or tendon damage or severe haemorrhage; or
- involves injury to any internal organ; or
- involves second or third degree burns on any burns affecting more than five per cent on the body surface; or
- involves verified exposure to infectious substances or injurious radiation.

Fatal injury

An injury is considered fatal if the person involved in the accident dies within 30 days after the accident due to reasons caused by the accident.

4.4.2 Principle and Purpose of Investigation

In principle the safety department (OS) is involved in any investigation of accidents and serious incidents related to Edelweiss operations. The purpose of an investigation of any accident or reportable incident is to establish the facts and causes, and thereby prevent further occurrence. The purpose is not to apportion blame or liability. Investigations shall be conducted by or under the authority of the Safety Manager, who shall determine as quickly as possible, the facts of the case, so that the Accountable Manager and his Nominated Persons can evaluate whether there are circumstances which necessitate

immediate changes to procedures, operating or engineering standards, modifications of equipment, or other measures.

This process ([PM 106 OS Internal Investigation](#)) shall take place independently of whether or not the state in which the incident occurs or any other state affected decides to carry out its own investigation. In principle it is not the policy of Edelweiss to institute disciplinary procedures in response to the reporting of an incident affecting safety, except the incident was a deliberate act or caused by gross negligence. Only in the rare circumstances where an employee has taken actions or risks which, in Edelweiss' opinion, no reasonably prudent employee with his/her training and experience would have taken, will Edelweiss consider initiating such disciplinary action. The fact that the employee has fully complied with his/her responsibilities to report (Safety Report) the circumstances and to co-operate fully throughout any investigation will weigh in his/her favour in Edelweiss' consideration of the matter.

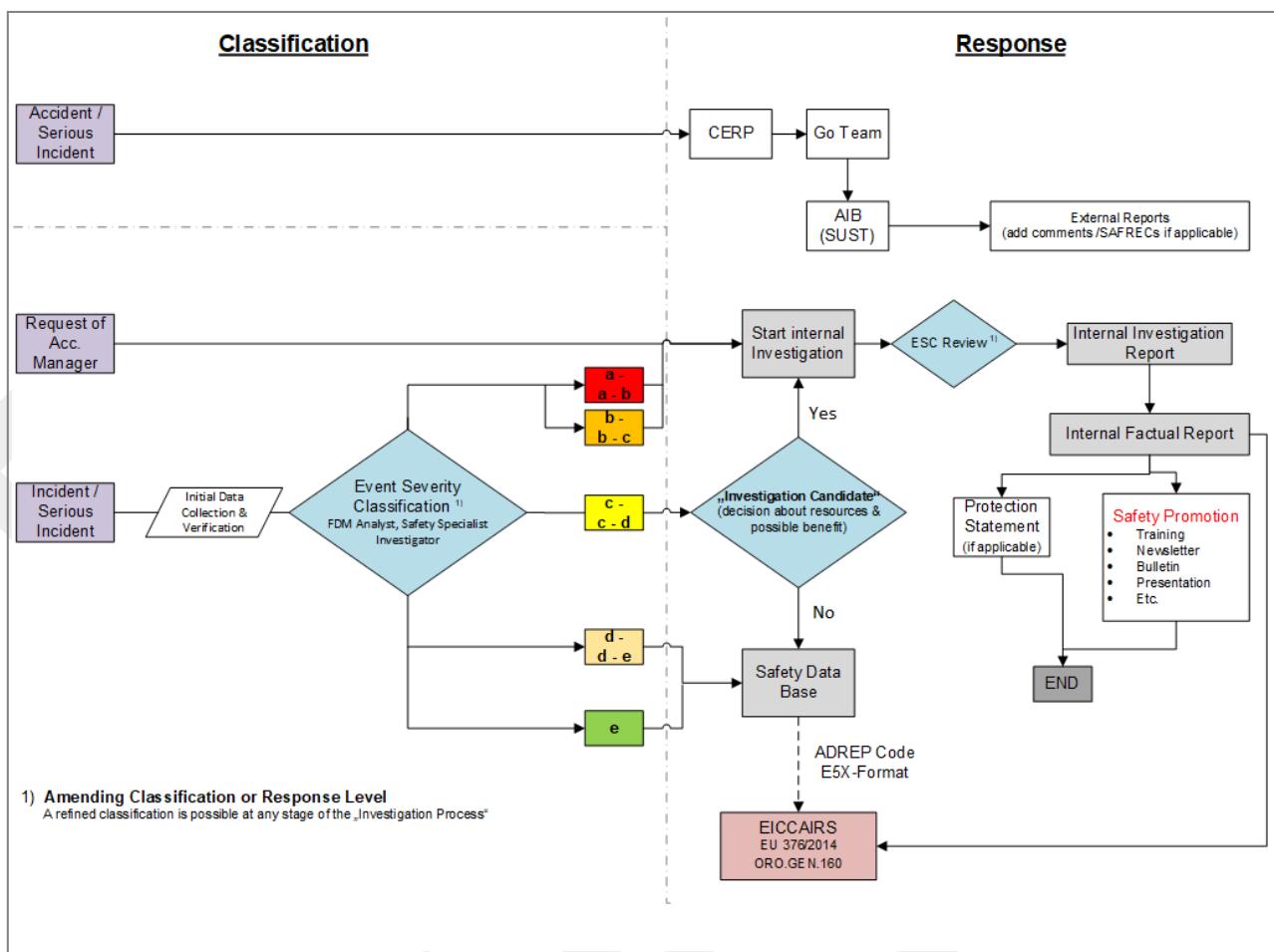
Typically, an investigation identifies causes, contributing factors and conditions and may lead to recommendations and corrective actions. Edelweiss is utilizing the IQSMS "Investigation Module".

According to European regulations each occurrence that jeopardised the aeroplane, the persons on board, and/or third parties shall be reported. Refer to [OM A Mandatory Occurrence Reporting](#) for a list covering the respective items.

Each Administrator processing the occurrence report will make sure that any mandatory report will be sent in due time (72 hours after becoming known) to the authorities (refer to OMM Mandatory Occurrence Reporting (MOR)). Submissions to ECCAIRS are in the E5X format.

4.4.2.1 Classification of Events & Incidents (Decision for an Investigation)

Traditionally it is quite difficult for a safety department to judge whether an event or incident has to be investigated. From a safety perspective certainly all events and incidents are worth being examined or investigated. However, this is limited by the possible outcome of the planned investigation and available resources. With other words a decision has to be made, whether the expected outcome justifies a - mostly demanding and time consuming - investigation. In parallel, cases are present where a decision has to be made whether an occurrence, if not classified as a mandatory occurrence, shall be forwarded to ECCAIRS or not. A solution for such daily decisions can be solved with the Event Severity Classifications (ESC). The following process aids as a decision guideline.



Description

After an event, occurrence or incident the available data has to be evaluated. If some facts are unknown or missing, additional data has to be collected (e.g. crew reports, interviews, etc.) in order to be able to apply the ESC-Method. ([PM 104 OS Event Severity Classification](#)) All events classified as "f" until "d" showed enough barriers in place for a particular hazard which will make a re-occurrence extremely unlikely or is considered acceptable. Such cases will be closed in the internal safety database and might be reported to ECCAIRS if necessary (MOR). Outcomes classified as "c-d" and "c" are considered so called "Investigation Candidates". Internal decision inside the OS department has to be made considering a possible outcome in case of an investigation and the available resources at present. If the decision is made for an internal investigation the OS department will initiate the process. At any stage of the investigation with more details and information gathered the ESC classification can be adjusted. This re-classification might lead to stop the investigation with just a factual report or it can confirm the necessity of the investigation. ESC classification with a result of "b-c" and "b" up to "a-b" and "a" are automatically triggering a full investigation.

The Accountable Manager can order an investigation any time regardless of the ESC classification.

4.5 Flight Data Monitoring Program

4.5.1 Introduction

The Flight Data Monitoring (FDM) program is designed to identify and analyse hazards and potentially hazardous conditions with the final aim to promote and improve flight safety within the company. FDM is a method by which each flight may be monitored to ensure that it is being operated in accordance with the company's manuals and procedures. It also allows monitoring of exceedances of operating limits, company operating policies and procedures, training effectiveness and engine health to assist in reducing unplanned "down time" for aircraft.

All flight data monitoring and associated information are managed and protected confidentially. Its processes are applied according to Edelweiss' just culture principles.

The Flight Data Monitoring program ensures a systematic download and management of electronically recorded aircraft flight data for all aircraft on the Edelweiss AOC.

Flight data analysis is performed in a consistent and standardized manner, and methods are defined for detecting and analysing events and data trends as well as for developing and implementing corrective or remedial action to address adverse events or trends.

An agreement with the pilot union (AEROPERS) defines in detail procedures, access, retrieval, evaluation, use, retention and archiving of all data recorded with FDM equipment on board aircraft operated by Edelweiss, as well as all data that can be sent or requested via ACARS data link where available to ensure data de-identification and confidentiality.

The office of the flight data analysts is separated from other office space in the company, with no insight and limited access to ensure confidentiality and secure facilities.

The program is managed inside the Flight Safety department (OSF).

It is considered as the best flight safety tool in the aviation industry at present. For all details concerning FDM refer to the FDM Manual, [PM 100 OSF Flight Data Monitoring](#) and [PM 111 OSF Flight Data Recorder Read-Out Request](#).

4.6 Safety-Studies, -Reviews, -Audits, -Surveys

4.6.1 Safety Studies

Safety studies are targeted inquiries to collect information and data on specific issues of interest, using research methods and tools. These may be carried out in-house or at an industry or nationwide level. The analysis of data from safety studies provides validated arguments and supporting evidence in support of the decision-making process with regard to mitigating safety hazards and managing risks.

Some safety studies involve surveys (e.g. questionnaires, interviews) to examine particular elements or procedures of a specific operation, such as problem areas or bottlenecks in daily operations, perceptions and opinions of operational personnel and

areas of dissent or confusion. Since survey responses are subjective, verification through other studies may be needed before corrective action can be taken.

Surveys provide an inexpensive source Safety Studies are performed for situations, operations or changes that have not happened or that have not degraded into a dangerous situation (event) yet, but that have the potential of harming people or properties in the future. These are dangers that the Safety Assurance Team must "proactively" or "predictively" foresee and where proper barriers must be put in place in order to reduce the probability that they will harm the safety of flight. Safety studies are rather large analyses encompassing broad safety concerns (industry- or world wide scale).

The Safety Review Board (SRB) as the strategical safety committee, identifies the needs for safety studies and has the final responsibility. Safety Studies are planned, conducted and then evaluated. Safety deficiencies will be revealed and analysed. Finding root causes and going through a risk assessment process will ease the way to determine effective and appropriate actions. Subsequent monitoring of implemented actions and determining their effectiveness is part of the SAG. The implementation is done by line managers/ Nominated Persons.

Studies may include:

- Flight Data Analysis
- Root Cause Models
- SPI Trend Analysis
- Safety Inspections
- Management of Change

4.6.2 Safety Reviews

Safety reviews are part of the management of change and ensure safety performance under changing operational conditions. Safety reviews ensure safety performance during periods of change, by providing a road map to safe and effective change.

Safety reviews are conducted during introduction and deployment of new technologies, change or implementation of procedures, or in situations of a structural change in operations.

4.6.3 Safety Audits

Audits are an important tool to measure an organisation's performance in regards to compliance, quality and safety. Auditing of safety performance is done in line with the other audits and inspections of the compliance management. Refer to [OMM Audits and Inspections-Plan](#) and [PM 120 OSQ Internal Audit Program Preparation](#).

Edelweiss has no separate process for safety audits, but rather an inclusion of the elements relevant for safety audits into the established auditing processes for internal

audits, subcontractor audits and security audits. This approach has been chosen to obtain maximum integration of the Safety Management System awareness.

During such audits, special focus lies in the areas of following criteria:

- SMS principles
- Soft factors
- Safety culture
- Mindset and attitude

These areas and their relevance to safety performance are an integral part of any audit.

In order to verify if systems, processes and procedures of the SMS are achieving the desired outcomes, Edelweiss has implemented a system of evaluating effectiveness and suitability which is applied when auditing the relevant standards.

4.6.4 Safety Surveys

Safety surveys are part of safety assurance and is managed by SAG. Safety surveys examine particular elements or procedures of a specific operation, such as problem areas or bottle necks in daily operations, perceptions and opinions of operational personnel and areas of dissent or confusion. Surveys may also be used to review particular areas of safety concerns where hazards are suspected. Safety surveys may involve the use of checklists, questionnaires and informal confidential interviews. The primary survey tool is the IQSMS survey module or another web based platform if a survey is organized by an external entity. Since surveys are subjective, verification may be needed before corrective action can be taken.

Surveys provide an inexpensive source of significant safety information. The process is the same as for the safety study, except that the SAG defines solely the need/ topics of the safety surveys.

4.7 Safety Performance Monitoring and Measurement

The primary function of setting performance measures is to monitor the operational safety performance of the organisation and to detect the practical drift (PD) from the baseline performance (defined process). This is achieved by monitoring and measuring the outcomes of activities that operational personnel must engage in for the delivery of services by the organisation. Remedial action takes place whenever unacceptable or abnormal trends are triggered.

4.7.1 Safety Concern

Once facts or safety issues become evident that the company's safety level might be lowered, these facts normally result in a safety concern. The Safety Assurance department will check the available data (SPIs/SPTs) to gain a better understanding of this particular safety concern.

Once the safety concern is well defined, safety objectives will be established to reflect the strategic achievements or desired outcomes related to these safety concerns.

4.7.2 Safety Objectives

Safety objectives are long term targets, reflecting the big picture and may or may not be quantitatively measurable. However, safety objective aligned with appropriate SPIs are preferred. Establishing objectives for the safety management system is vital for directing the organisation's resources to achieve the desired outcomes. These objectives can be specific or can apply to the entire operation and should be defined by the OS-department and presented and approved in the SRB. Safety Objectives development must be consistent with the safety management policy statement. The objectives themselves and later the results are communicated to all operational personnel. These objectives can be for example:

- Changes in company policies,
- Implementation of new managing systems,
- Continuous improvements of certain systems, etc.

4.7.2.1 Process for developing Safety Objectives

OS department is reviewing safety data, existing safety objectives and the safety & security policy on a yearly basis, to identify any need for an adjustment in an existing objective or if a totally new safety objective might be necessary.

In parallel the relevant SPIs are revised, whether the quality of data still meets the expectation, and the targets are realistic and achievable.

A first overview of the recently designed safety objectives is presented at the OS-Team Meeting and discussed among all participants. Any adjustments will be done during discussions direct in the PPT-presentation.

Once the OS-Team meeting is satisfied with result of the safety objective they will be linked to responsible departments (if possible) and the necessary SPIs/SPTs challenged.

The new safety objective will be presented to the Accountable Manager.

The approved safety objectives will be uploaded to TEAMS GRP-RM-SPI.

4.7.3 Safety Performance Indicators (SPI)

Safety performance indicators (SPIs), measurable objectives (data-based parameter expressed in numerical terms) reflecting the operational safety performance. The SPIs should be directly linked to the normal operation and related safety concerns in regard to the SMS. SPIs are a tactical and strategically monitoring and measurement tool to monitor the safety performance of Edelweiss in the SMS. For each SPI, a SPT must be defined. The SPIs are also a tool for the Management Evaluation. These build the base for further hazard identification and risk assessment. The responsible nominated person or

manager presents these results at the ME/SRB meeting where follow-up actions, mitigations and safety performance targets might be defined or adjusted.

Each SPI, the associated target (SPT) and all relevant data is documented on DOC 65 and stored inside OS. The entire process for SPI/SPT is described in the [PM 108 OS SPI/SPT Monitoring](#).

4.7.3.1 Possible Origins of Edelweiss' SPIs

Edelweiss' SPIs can be:

- created by the functional area, because of known critical areas in operation; experience in own processes and risk profile
- an outcome of the safety review board
- given by the authority
- selected in accordance with external information.

4.7.3.2 Possible data source for SPIs

- Reports
- Surveys
- Bowties
- Audits or Internal Inspections
- FDM
- Meeting Minutes
- Benchmark with other airlines

4.7.4 Safety Performance Targets (SPT)

Safety Performance Targets (SPT) define long-term safety performance objectives. They are expressed in numerical terms and must be concrete, measurable, acceptable, reliable and relevant. Targets also need to contain completion dates with milestones if the target has to be achieved in phases or over an extended period of time. Targets provide a measurable way of ensuring and demonstrating the effectiveness of safety performance.

Target setting should take factors such as the applicable level of safety risk, the costs and benefits related to improvements to the aviation system, as well as expectations regarding the safety of Edelweiss into consideration. The setting of desired improvement targets should be determined after considering what is realistically achievable for the associated sector. It should take the recent historical performance of that particular safety indicator, where historical trend data is available into consideration.

Benchmarking with known data from the aviation industry might be a helpful tool for creating a realistic SPT.

Refer to DOC 65, Safety Performance Indicator (development form).

Edelweiss has an SPI tracking and monitoring tool in place (Tableau). The organisation develops SPIs and SPTs and tracks the SKPI trend in the given interval.

The tool is accessible to the NP, department leaders and the Accountable Manager via the Tableau "Landing Page".

Formal process to develop and maintain a set of performance parameters, allowing monitoring of trends	SPI/SPT Form DOC 65, PM 108 OS SPI/SPT Monitoring IQSMS (acceptable. No of events), PM 105 OS Management of Change
Formal process to develop and review a coherent set of safety goals to achieve overall safety objectives	ME, DOC 27 Targets for each NP OMM Management Evaluation (ME) , OMM Safety Review Board (SRB) PM 108 OS SPI/SPT Monitoring , PM 103 OS Management Evaluation/SRB
Internal audit system in place, covering all functions, activities and organisation. Audit scopes, frequency defined	OMM Compliance and Conformance Monitoring Program
Internal investigation process	PM 106 OS Internal Investigation , IQSMS Investigation Module

4.7.5 Continuous Improvement of the SMS

Edelweiss constantly seeks to improve its operational, safety and security performance. Continuous improvement of the SMS and SeMS is overseen by the Management Evaluation. Refer to [OMM Management Evaluation \(ME\)](#).

Continuous improvement is measured through the monitoring of the organisation's safety and security performance indicators and relates to the maturity and effectiveness of the SMS and SeMS. Safety assurance processes support improvements of the SMS and SeMS through continual verification and follow up actions.

Continuous improvement in Edelweiss is achieved through internal inspection, internal and external audits and applies to:

- proactive evaluation of facilities, equipment, documentation and procedures, for example, through internal inspections (refer to [OMM Compliance and Conformance Control](#))
- reactive evaluations in order to verify the effectiveness of the system for control and mitigation of safety risks, for example, through internal and external audits.

Edelweiss utilises the IQSMS Quality Module to schedule, conduct and monitor internal inspections and audits.

4.8 Safety Auditing

In accordance with Edelweiss' fundamental beliefs, Safety Management and Compliance Monitoring Management are working completely interlinked for the sake of an effective safety assurance.

Therefore, auditing of safety performance is done in line with the other audits and inspections of the compliance management. There is no separate process for safety audits, but rather an inclusion of the elements relevant for safety audits into the established auditing processes for internal audits, subcontractor audits and security audits. This approach has been chosen to obtain maximum integration of the Safety Management System awareness.

During such audits, special focus lies in the areas of following criteria:

- SMS principles
- Soft factors
- Safety culture
- Mindset and attitude

These areas and their relevance to safety performance are an integral part of any audit.

As a standardised audit question in any audit, a sample check of relevant mitigations or corrective actions, resulting from occurrence reports, are mandatory.

4.9 Change Management

Edelweiss has a formal process, [PM 105 OS Management of Change](#) in conjunction with DOC 180, to identify changes within or external to the organisation, which may affect established processes and services concerning aircraft operations. This process takes existing hazard identification, risk assessment and the mitigation process into account. Furthermore, the arrangements to ensure safety performance before implementing changes are described, as well as how to eliminate or modify safety risk controls that are no longer needed or effective due to changes in the operational environment. The management of change should generally include any business decision that poses potential new risk(s) to operations. It is impossible to list all instances of such initiatives, but examples might include significant changes to operations, such as the addition of new routes or destinations, the acquisition of new aircraft type(s) or the introduction of significant outsourcing of operational functions.

In case the change management affects Lufthansa Group, in addition, an LHG ORE will be conducted.

The following cross-reference list guides to the associated processes and documents:

Formal process for the management of change	PM 107 OS Change Management and Safety Assessment
Process for the management of change analysing changes to operation or key personnel for risks	PM 103 OS Management Evaluation/SRB DOC 58
Changes which affect established processes are identified	PM 103 OS Management Evaluation/SRB DOC 58 PM 107 OS Change Management and Safety Assessment
Maintenance of safety performance is ensured prior to the implementation of changes	OMM Edelweiss High Reliability Management (OS)
Management of risks related to crew fatigue when implementing changes affecting crew	PM 110 OS Fatigue Risk Management OMM Edelweiss High Reliability Management (OS)
ORE Lufthansa Group	DOC 66
Group Risk Rating	DOC 68
Risk Controller to check the correct implementation of the mitigations and to provide the evidence (Excel List)	PM 105 OS Management of Change Excel List: Workspace Risk Controller MoC_Mitigation Nachweis

4.10 Safety Promotion

4.10.1 Training and Education

Documented process, identifying training requirements so personnel are competent to perform their duties	PM 262 OT Management System Basic Training OMM Management System Training Annual internal audits according audit plan
Appropriate safety initial, recurrent and update training to individuals involving SMS	OMM Management System Training Annual internal audits according audit plan PM 262 OT Management System Basic Training
Emergency preparedness and response training for affected personnel	OMM Emergency Response Plan CERM (ERP) Annual exercises with LX

Validation process that measures the effectiveness of training	OMM Auditor Selection and Training OMM Management System Training PM 262 OT Management System Basic Training
Initial safety training incorporated into introduction training upon employment	OMM Management System Basic Training OM D Management System Training
Fatigue Risk Management	OMM Management System Training OM D Training for Fatigue Risk Management (FRM)

4.10.2 Safety Communication

Communication processes in place that permit SMS to function effectively and commensurate with size and scope of company	OMM Communication
Information established and maintained in a suitable medium that provides direction in related documents	OMM Communication
Conveys safety critical information, especially relating to assessed risks and analysed hazards and explains why particular actions are taken	IQSMS / Tableau Reporting and Finding Statistics, MoC publications

4.10.3 Safety Notice

A safety notice is an internal publication with the aim of sharing events and experience among Lufthansa Group airlines. The respective safety department of the airline that discovered the event prepares the content. Within LHG it is managed and distributed by FRA CF/Q via e-mail.

4.10.3.1 Contents

A safety notice generally consists of the following contents:

- Administrative information: Such as operator, investigator contact details, HTE and ESC (if applicable), location
- Factual information: Describes the incident itself, but does not carry out an assessment
- Analysis: Describes the current status of the investigation as well as identified causes and effects
- Actions: Describes the measures taken or planned by the respective AOC

- Additional information: Contains general information on how to proceed and points which must also be mentioned in this Safety Notice
- Revision record: Is adjusted in accordance with the current revision
- Attachments: E.g. Preliminary investigation report, (updated) operational risk assessment, audit results.

4.10.3.2 Trigger Criteria for a Safety Notice

A safety notice shall be issued if at least one of the following applies:

- In the context of an investigation; if the event severity classification (ESC) classifies "b-c" or higher
- In a predictive risk assessment (MoC) (e.g. planned change); a risk level B or higher is determined, without the possibility of introducing mitigations that lower the risk level
- In a reactive risk assessment (MoC) (e.g. incident driven, ongoing activity, updated active ORE); a risk level B or higher is determined
- An AOC gives a divisional safety recommendation; which may be relevant for the entire LHG
- In the course of an audit; a risk level B or higher is determined
- There are safety-relevant events or information which, based on the expert opinion of the respective safety management of the AOC, should be disseminated immediately throughout the entire LHG.

4.10.3.3 Process

Refer to the LHG safety process database, accessed through LHG intranet (eBase).

4.10.3.4 Form

For the "Safety Notice (LHG) form" refer to the LHG Safety SharePoint/Safety Data Analysis.

4.10.3.5 Liability and Confidentiality

A safety notice serves as additional safety information only. The author of a safety notice does not take any responsibility for the content, completeness, risk levels and effectiveness of the suggested mitigations stated in a safety notice.

The content of a safety notice is confidential unless otherwise specified. The distribution of a safety notice beyond the Safety Managers of LHG is subject to approval by the author of the safety notice.

When preparing the safety notice the author decides whether the information may also be passed on for the purpose of internal publication. For this purpose the safety notice contains a tick box. If the field is ticked, the author releases the information regarding factual information, analysis and actions.

4.11 Safety Review Board (SRB)

The Safety Review Board (SRB) is a high-level committee which considers strategic safety functions acknowledge the safety objectives and targets according evaluated safety concerns and analyses the safety performance of the operation and company. It is the platform where any participant may communicate to the accountable manager any information, as necessary, to allow decision-making based on safety data. The SRB also measures if selected defences and implemented controls against hazards identified in the past are working as expected. If the status is still considered as unsatisfactory, the SRB will put this topic again on the agenda of SAG or FSAG. The Safety Review Board is chaired by the Accountable Manager, but prepared, organised and moderated by the Head of High Reliability Management (refer to [PM 103 OS Management Evaluation/SRB](#)).

4.11.1 Stakeholders

The Safety Review Board (SRB) includes all managers of the functional areas and all nominated persons. All participants have to be prepared to report their SPIs/SPTs and other safety relevant topics within their respective departments and if applicable from key partners of outsourced services. Meeting minutes are taken and will then be distributed among the SRB members. Actions are planned, assigned and monitored with Microsoft Planner. The invitation for the SRB meeting will consider the following departments: OS, OSY, OSQ, OSF, OC, OT, OG, OP, PC, T, TM, C.

If special expertise is required, other participants might be invited to attend the SRB meeting on demand.

4.11.2 Timing

Edelweiss performs the Safety Review Board (SRB) twice per year. If any high-level risks are identified during operations, or certain events require immediate reaction, immediate additional SRB have to be set up. The Accountable Manager chairs the Safety Review Board.

4.11.3 Terms of Reference

As a minimum the Safety Review Board is responsible for:

- monitoring the airline's operational safety performance against the Safety Management System (especially safety policy and safety objectives)
- setting or adjusting safety targets
- monitoring that any necessary corrective action is being taken in a timely manner
- monitoring the effectiveness of the airline's safety management processes (SMS) which give effect to the declared corporate priority of business management for operational safety
- monitoring the effectiveness of the corporate oversight processes which independently validate the airline's safety performance

- ensuring that appropriate resources are allocated to meet agreed actions which enhance safety performance beyond that required by regulatory compliance alone
- monitoring the effectiveness of safety oversight of subcontracted operations carried out on behalf of the airline
- giving strategic direction to the airline's Safety Action Group
- reviewing the FRM performance
- reviewing the company's policies (safety & security policy, FRM policy, a.o.).

4.12 Safety Action Group (SAG)

The Safety Action Group (SAG) is a working group focusing on safety, security and compliance related topics and serves as a "decision board" sharing information, identifying mistakes and weak points and issuing mitigation measures in order to assure and to further develop a safe, efficient and reliable operation. It reports to and takes strategic direction from the Safety Review Board.

All participants shall bring forward any safety relevant issue they deem necessary to be discussed, regardless of risk index calculated, especially topics which could not be solved bilaterally with concerned departments or are expected to be time consuming. Nevertheless, any new hazard having been allocated a risk index "C" or greater must be taken to the SAG-Meeting.

4.12.1 Stakeholders

SAG membership will be drawn from managers, supervisors and staff from within the appropriate functional areas. The minimum stakeholders taking part are:

- Safety Manager
- Deputy Safety Manager
- Risk Manager
- Deputy Security Manager & Risk Controller OSY
- Compliance Monitoring Manager
- Deputy NP Flight Operation & Risk Controller OC
- Deputy NP Ground Operation & Risk Controller OG
- Deputy NP Crew Training (Head of Training) & Risk Controller OT
- Deputy NP Maintenance & Risk Controller TM
- Deputy Head of Cabin Management & Risk Controller PC
- Technical Pilot
- Dispatch (optional)
- Head of High Reliability Management (optional)

If special expertise is required, other participants might be invited to attend the SAG meeting on demand.

All departmental heads will be invited with the status "optional" to the SAG meeting. This enables them to participate in the SAG meeting when they deem it necessary. The

participation of the head of a department is only mandatory if his deputy cannot participate in the SAG meeting.

The SAG meeting is chaired by the Safety Manager.

4.12.2 Timing

SAG meetings will normally take place on a quarterly basis, except for any extra ordinary meetings.

4.12.3 Terms of Reference

As a minimum the SAG is responsible for the following:

- to oversee and monitor operational safety within the functional areas
- to ensure that any necessary corrective action is taken in a timely manner
- to resolve identified risks and monitor the impact on operational safety especially during changes
- to report to and accept strategic direction from the Safety Review Board.

This will be done by:

- ensuring that hazard identifications and risk assessments are carried out as appropriate with such involvement of staff as may be necessary to build up safety awareness
- ensuring that satisfactory arrangements exist for safety data capture and handling employee feedback
- ensuring that suitable safety performance indicators are developed and regularly reviewed
- ensuring that the mandatory audit programme is so operated as to maximize its direct contribution to safety performance and that full assistance is afforded to the corporate safety department in the event of a requirement to carry out a safety audit or review of any aspect of the operation
- convening of such meetings or briefings as may be necessary to ensure that effective opportunities are available for all employees to participate fully in management of safety
- ensuring that shortfalls in human performance which are found to have contributed to safety events are dealt with in such a manner that no avoidable indirect detriment is caused to the contribution which the workforce shall make to the required culture of safety as a priority

- ensuring that adequate investigation of safety events/issues takes place and that safety reviews are then conducted and any actions arising tracked to completion
- ensuring that appropriate safety, emergency and technical training of personnel is carried out to meet or exceed minimum regulatory requirements
- reviewing the effectiveness of previous safety recommendations and safety promotion
- reviewing incident, accident and safety information received from other operators, manufacturers and airworthiness authorities, and the dissemination of appropriate information to staff.

4.13 Fatigue Risk Management System (FRMS)

Fatigue is a human factors hazard because it affects all aspects of an individual's performance and therefore ability to function safely and effectively. In line with its commitment towards the safety of operations, Edelweiss aims to manage the risk of fatigue like it does all risks to safety, using the standards and processes defined by the Edelweiss SMS. As such, Fatigue Risk Management (FRM) can be considered a focused application of the SMS concept, which specifically assesses and reduces the impact of the risk of fatigue on human performance and, by extension, the safe accomplishment of operations.

FRM at Edelweiss involves the proactive, reactive, and even predictive identification of hazards and the management of fatigue risks arising from such hazards during operations.

4.13.1 Scope and Implementation of FRM

Although based on industry standards and best practices, Edelweiss FRM activities are customised to take into account the company culture and the size, scope and nature of operations. They initially address flight and cabin crew operations.

FRM implementation is based on a gap analysis and includes the specific Edelweiss crew rotation patterns with frequent night flights, time zone differences and long layovers at destinations on other continents. For short-haul operations, specific attention lies on disruptive schedules and turnarounds with duty time close to maximum values as defined in EASA Flight Time Limitations (ORO.FTL).

FRM is documented through:

- Fatigue Risk Management Manual
- Fatigue Risk Management Policy
- FRM Processes ([PM 110 OS Fatigue Risk Management](#), [PM 285 OP Monitoring of Unknown State](#))
- FRM activities and their output

- FSAG and SRB meeting minutes
- FRM training and promotion materials (including training records)
- Fatigue-relevant data and findings (e.g. reports, surveys, studies, measured data), including safety performance indicators

4.13.2 Accountability of FRM

Accountability for the management of fatigue rests with the Accountable Manager, as a direct extension of his responsibilities towards the overall management system.

4.13.3 Responsibility of FRM

The Safety Manager is responsible for the development, administration, and maintenance of the company's FRM processes.

Two safety bodies ensure cross-divisional representation in all decisions to address the risk of fatigue in Edelweiss operations:

Safety Review Board (SRB)

- General monitoring of FRM performance
- Review of FRM processes in a 3 year interval
- Steering inputs for SAG and Head of High Reliability Management

Fatigue Safety Action Group (FSAG)

- Fatigue related hazard identification
- Decision
- Body for predictive, proactive and reactive mitigation actions.

4.13.4 Fatigue Hazard Identification

Fatigue related Safety Hazards are identified in a predictive, proactive and reactive manner. A data-driven approach supports an objective identification method. The following data is gathered and evaluated on a regular basis:

- Reporting of fatigue related observations by using a specific fatigue report
- Crew surveys based on scientific questionnaires
- Common alertness measurement in cooperation with scientists from Zurich University of applied Science
- Application of biometric models in cooperation with SWISS International Airlines.

4.13.5 Fatigue Safety Risk and Mitigation Process

Edelweiss Fatigue Safety Risks and Mitigations are managed through the process PM 110 OS Fatigue Risk Management. The Fatigue Safety Action Group (FSAG) is responsible to define, implement, monitor and track mitigation actions. The bi-annual rotation meeting

is used as working arrangement to implement mitigation actions linked to crew rotation patterns.

4.13.6 Risk Assessment of Fatigue Reports

As fatigue occurs “within” crew members - extreme fatigue cannot be detected by others - it is more likely to be under-reported than other more prominent occurrences (e.g. unstable approaches which might pop up in FDM). Fatigue Risk Management is therefore designed as a multi-faceted approach and ESC of reported fatigue risks/events is unsuitable as a sole measurement of fatigue-related risks and/or effectiveness of FRM. It may be valuable in detecting trends and monitoring pro-active fatigue management measures which should endeavour to reduce average fatigue as low as reasonably practicable and ensure that a maximum permissible level of fatigue is never exceeded.

The risk assessment of fatigue reports are based on the tables below which takes into account the subjective Samn-Perelli scale and is done in the IQSMS Reporting Module.

4.13.6.1 Cabin Crew Members

Flight Phase or others	HTE-List Entry	Samn-Perelli fatigue scale (SPS)	Meaning	Most credible accident scenario	Effectiveness of the remaining barriers	New ESC proposal
Take off	Cabin crew fatigue - TO_SP5	5. Moderately tired , let down	Fatigue during take off phase level SP5 (one crew member*)	A1	E9	h-i
Take off	Cabin crew fatigue - TO_SP6	6. Extremely tired , very difficult to concentrate	Fatigue during take off phase level SP6 (one crew member*)	A2	E9	g-h
Take off	Cabin crew fatigue - TO_SP7	7. Completely exhausted , unable to function effectively	Fatigue during take off phase level SP7 (one crew member*)	A2	E8	g
Cruise	Cabin crew fatigue - CR_SP5	5. Moderately tired , let down	Fatigue during cruise phase level SP5 (one crew member*)	An	E10	i
Cruise	Cabin crew fatigue - CR_SP6	6. Extremely tired , very difficult to concentrate	Fatigue during cruise phase level SP6 (one crew member*)	An	E5	h-i
Cruise	Cabin crew fatigue - CR_SP7	7. Completely exhausted , unable to function effectively	Fatigue during cruise phase level SP7 (one crew member*)	A3	E12	h
Landing	Cabin crew fatigue - LD_SP5	5. Moderately tired , let down	Fatigue during landing phase level SP5 (one crew member*)	A1	E9	h-i
Landing	Cabin crew fatigue - LD_SP6	6. Extremely tired , very difficult to concentrate	Fatigue during landing phase level SP6 (one crew member*)	A2	E9	g-h
Landing	Cabin crew fatigue - LD_SP7	7. Completely exhausted , unable to function effectively	Fatigue during landing phase level SP7 (one crew member*)	A2	E8	g
Unspecified SP or phase	Cabin Crew Fatigue	<SP 5	<SP 5	No Risk		
Reported Unfit	Cabin Crew - Reported Unfit			(No Risk if reported unfit before commencing flight duty)		
				* Increased fatigue level for multiple crew members at the same time is considered as a contributing factor and taken into account by an increased ESC value.		

4.13.6.2 Flight Crew Members

Flight Phase or others	HTE-List Entry	Samn-Perelli fatigue scale (SPS)	Meaning	Most credible accident scenario	Effectiveness of the remaining barriers	New ESC proposal	
Take off	Pilot fatigue - TO_SP5	5. Moderately tired , let down	Fatigue during take off phase level SP5 (one crew member*)	A1	E8	h	
Take off	Pilot fatigue - TO_SP6	6. Extremely tired , very difficult to concentrate	Fatigue during take off phase level SP6 (one crew member*)	A2	E9	g-h	
Take off	Pilot fatigue - TO_SP7	7. Completely exhausted , unable to function effectively	Fatigue during take off phase level SP7 (one crew member*)	A3	E8	f	
Cruise	Pilot fatigue - CR_SP5	5. Moderately tired , let down	Fatigue during cruise phase level SP5 (one crew member*)	An	E5	h-i	
Cruise	Pilot fatigue - CR_SP6	6. Extremely tired , very difficult to concentrate	Fatigue during cruise phase level SP6 (one crew member*)	An	E4	h	
Cruise	Pilot fatigue - CR_SP7	7. Completely exhausted , unable to function effectively	Fatigue during cruise phase level SP7 (one crew member*)	A3	E11	g-h	
Landing	Pilot fatigue - LD_SP5	5. Moderately tired , let down	Fatigue during landing phase level SP5 (one crew member*)	A1	E7	g-h	
Landing	Pilot fatigue - LD_SP6	6. Extremely tired , very difficult to concentrate	Fatigue during landing phase level SP6 (one crew member*)	A2	E8	g	
Landing	Pilot fatigue - LD_SP7	7. Completely exhausted , unable to function effectively	Fatigue during landing phase level SP7 (one crew member*)	A2	E5	e-f	
Unspecified SP or phase	Pilot Fatigue	<SP 5	<SP 5			No Risk	
Reported Unfit	Pilot - Reported Unfit					(No Risk if reported unfit before commencing flight duty)	
				* Increased fatigue level for multiple crew members at the same time is considered as a contributing factor and taken into account by an increased ESC value.			

4.13.6.3 Fatigue Impacting or Potentially Impacting the Ability to Perform Flight Duties Safely

Fatigue reports with a fatigue rating of greater than 6 according to the “Samn-Perelli scale” and any other fatigue report where fatigue was a contributing factor to an event where a mandatory occurrence report is required will likewise be treated as a mandatory occurrence report (MOR).

4.13.7 Fatigue Safety Action Group (FSAG)

The FSAG is a working group responsible for coordinating all fatigue risk management activities. The FSAG uses performance indicators (SPIs, KPIs) to monitor issues and/or escalates issues (cases) to the relevant risk owner.

4.13.7.1 Stakeholders

The membership of the FSAG includes a least one representative of the following groups and the listed persons:

- Flight Operation
- Cabin Crew Operation
- Crew Planning
- AEROPERS representative
- EFA (Edelweiss Air Flight Attendant Association) representative
- Safety Manager
- Flight Safety Manager
- Head of High Reliability Management

- Accountable Manager (optional)
- Crew Training (optional)

4.13.7.2 Timing

The FSAG will normally take place on a quarterly basis, except any extra ordinary meetings.

4.13.7.3 Terms of Reference

The principle functions of the FSAG are to:

- oversee the development of the FRMS
- assist in FRMS implementation
- oversee the ongoing operation of the FRM processes
- contribute as appropriate to the FRMS safety assurance processes
- maintain the FRMS documentation
- and be responsible for the content of FRMS training and promotion.

5 Compliance and Conformance Management

5.1 Compliance and Conformance Monitoring Program

5.1.1 Function

The compliance and conformance monitoring and assurance system of Edelweiss shall ensure safe operation standards and airworthy aeroplanes in compliance with regulations and conformance with industry standards.

Edelweiss's system is built on the following two main pillars:

- Compliance and conformance monitoring assurance
- Compliance and conformance monitoring control.

5.1.1.1 Compliance and Conformance Assurance

The Compliance Monitoring Manager (CMM), his deputy and assigned auditors perform the monitoring tasks of compliance assurance and conformance with:

- audits
- inspections.

The main objective of compliance monitoring assurance is the verification of Edelweiss' compliance against the legal requirements, processes and procedures in the respective manuals.

If inspections or audits show a performance below the required level which could lead to a degradation of safe operations, corrective actions are being taken without delay.

The Edelweiss compliance monitoring system will be adapted in due time whenever major changes in the organisation, operations, training or maintenance take place.

5.1.1.2 Compliance and Conformance Control

Head of departments / NPs and their deputies are responsible for compliance and conformance control by supervision of the different departments of Edelweiss. The main objective of compliance and conformance control is the verification of the practical application of procedures against the written ones.

Supervision is achieved by:

- department inspections during daily operations.

5.1.2 Program

The Compliance Monitoring Program includes audits and inspections in the IQSMS Quality module based on the yearly audit and resource plan. The audit program includes scope and area of audit/inspection and planned schedule date based on 'Regulation Assignment' and the 'Audit Assignment & Resource plan'. A review and follow up including resource control is established continuously by the CMM, considering any amendments to ensure compliance and conformance with current or new requirements or standards.

Any corrections and corrective action necessary based on findings and audits/inspections are also under control within the tool IQSMS. OSQ shall enable the organisation to ensure efficient and effective handling of findings are established and train the organisation accordingly (e.g. sufficient root cause analysis).

OSQ related Record and Archiving System data are accessible within:

- IQSMS
- Windows 365 Teams GRP-OSQ-Audits
- Windows 365 Teams GRP-OSQ
- Yonder
- MINT (Training Records)
- See also [OMM Management System Training](#)

5.1.3 Organisational Setup

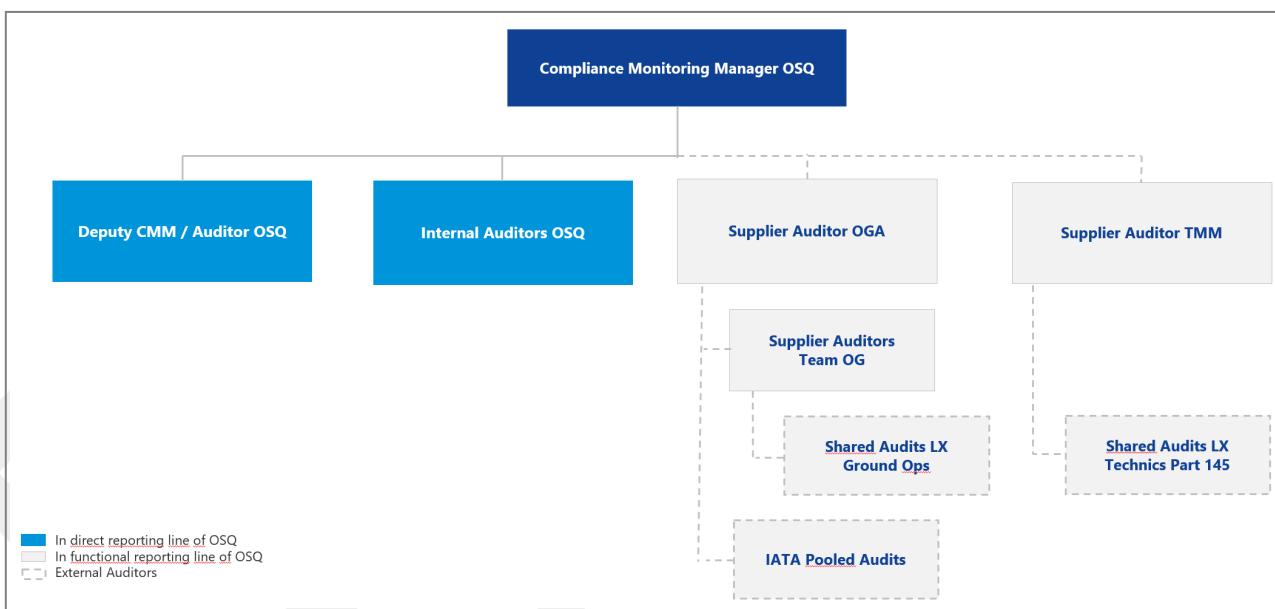
The Compliance Monitoring Manager (CMM) and his deputy have direct access to the Accountable Manager (ACM) and to all departments within Edelweiss as well as to all activities and documents which are required to fulfill their tasks.

A detailed description of the duties, responsibilities and authorities allocated to the Compliance Monitoring Manager, its deputy and the auditors performing audits in their independent function can be found in their position profile (Leistungsauftrag).

Supplier audits in Ground Operations and Line Maintenance are planned and managed by OGA and TMM. These auditors are reporting directly to the respective Nominated Person. However, in terms of compliance and conformance monitoring assurance they are directly reporting to the CMM.

All external contracted partners of Ground Operation and Cargo service suppliers are audited by OG and OGA auditors.

All external contracted partners of Line Maintenance service suppliers are audited by TMM while the audits for base maintenance (C-Checks, A/C Overhaul) and engines are subcontracted to Swiss Quality Management.



5.1.4 Activities Compliance and Conformance Management

Compliance and Conformance Management includes the following main activities:

- Establishing annual audit plans for EASA and IOSA (individual plans for Air Operations, Aircrew, CAMO, and Ground & Cargo);
- Conducting internal audits/inspections;
- Conducting subcontractor audits/inspections;
- Legal Requirements Monitoring (LRM);
- Supporting Root Cause Analysis (RCA) and of an appropriate Corrective Action Plan (CAP);
- Finding risk level evaluation according to [OMM Severity](#) table and [OMM Probability \(Likelihood\)](#) table (task delegated: performed by the risk controller);
- Tracking of findings;
- Monitoring the implementation and effectiveness of measures associated to findings and risks;
- Checking manual revisions (PRA, Compliance List & List of Change) for legal compliance;
- Providing trend evaluation, organisational awareness and feedback related to the compliance and conformance monitoring assurance to the operational management (O) (refer to [OMM Findings, Organisational Awareness and Feedback](#)).

5.1.5 Audit Tool IQSMS

Edelweiss Air uses the electronic database IQSMS (Integrated Quality & Safety Management System) Quality Module for the management of compliance and conformance monitoring.

ASQS (Advanced Safety & Quality Solutions) provides the quality module and the necessary licenses to Edelweiss Air and is responsible for the maintenance of the IQSMS in technical regards. ASQS also ensure that the currently applicable regulative frameworks are available in the database. OS and OSQ is the main point of contact for ASQS. CBT (Computer Based Training) for auditors and auditees, administration personnel etc. is available within the tool as well as different user guides.

The IQSMS reflects all associated Compliance and Conformance Management processes. It includes the following information and data:

- Alpha-numeric identifier
- Auditor name(s)
- Auditee name(s)
- Audit dates
- Scope to be audited
- Audit checklists based on ISARPs, EASA Implementing Rules including AMCs and internal standards audited and effective at the time of audit(s)
- Appropriate documentation references from the Management System and Operations documentation system
- Evidence(s) gathered during audits
- Level of findings
- Due dates of findings
- Persons responsible for findings
- Root cause analysis
- Implemented corrections/corrective actions/preventive actions and follow-up
- Finding risk rating
- Non-applicabilities
- Summary (IQSMS: Management Review)
- IOSA specific: Auditor actions accomplished by auditor(s).

5.1.6 Findings, Organisational Awareness and Feedback

Findings of audits and inspections are automatically recorded in IQSMS and visualised in Tableau.

Results and information to the management about the status of compliance and conformance monitoring assurance are communicated during:

- Audit Report (sent to the ACM, CMM, NP and auditees)
- Accountable Meeting Meetings with the ACM and NPs
- O-Open session
- Face-to-face meeting between CMM and ACM
- Tableau dashboard
- SAG meetings
- Quarterly Report to the Accountable Manager AOC and its organisation

- Management Evaluation and Safety Review Board ([PM 103 OS Management Evaluation/SRB](#))

Non-management operational personnel will be informed to ensure an organisational awareness of compliance with applicable regulatory and other requirements by:

- Manual revision
- Recurrent training
- Memos, infos & bulletins
- Compliance & conformance promotion/ news (at least every 6 months).

Feedback (i.e. room for improvement) from all employees can be brought forward towards Edelweiss with the IQSMS reporting system or via Yonder change request.

5.1.7 Definition related to Audits and Inspections

5.1.7.1 Audit

Audit means a systematic, independent and documented process for obtaining evidence and evaluating it objectively to determine the extent to which requirements are complied with.

5.1.7.2 Inspection

Inspection means an independent and documented conformity evaluation by observation and judgement accompanied as appropriate by measurement, testing or gauging, in order to verify compliance with applicable processes and procedures.

5.1.7.3 Objective Evaluation

This process allows Edelweiss to ascertain whether:

- written, mutual or other kind of rules are implemented
- the results aimed for are achieved with the related activities
- the rules are appropriate to achieve the objectives and results.

5.1.7.4 Audit Criteria

For compliance and conformity audits a set of policies, processes, procedures or legal requirements are used as reference.

5.1.7.5 Audit Evidence

Information which is relevant to the audit criteria and verifiable serves as audit evidence:

- Documentation in controlled documents (e.g. manuals, tools which are specifically referred to in manuals)

- Evidence of implementation (e.g. records, photographs, observed behaviour).

5.1.7.6 Audit Assessment Options

For auditing other than internal IOSA, the "PSOE"-technique shall be applied when assessing compliance:

P – Present

Evidence is present that the requirement is reflected either as a policy, program, process or procedure and described in a controlled document.

S – Suitable

The above mentioned description can be considered as being suitable based on Edelweiss' size (e.g. number of aeroplanes, employees), nature and complexity (e.g. area and kind of operations).

O – Operating

There is evidence of implementation indicating that the described acts are applied in daily life and an output is produced.

E – Effective

There is evidence that the desired output is achieved.

Effectiveness ("doing the right thing") is not the same as efficiency ("doing the thing right"). Effectiveness could therefore be fulfilled without being efficient – what would not be desired but still in compliance as long as marginal efficiency would not result in a drawback towards effectiveness.

Note: To rate a requirement as "compliant", "P" & "S" & "OE" must all be fulfilled. "E" is linked together with "O" as one assessment point "OE", as "E" will not be applicable/usable to all requirements/standards.

However, not all points of the PSOE-technique may be applicable to every requirement. For example AMC1 ORO.AOC.100 Application for an AOC - Application Time Frames can't be rated as suitable "S" as the time frames are not based on Edelweiss' size, nature or complexity. Not applicable points of the PSOE do not generate a finding.

5.1.7.7 Audit Finding

An audit finding is the result of the evaluation of collected audit evidence against audit criteria and indicates either:

- compliance/non-compliance, or
- conformity/non-conformity with audit criteria, or

- opportunities for improvement (IQSMS: listed under “auditor comments”).

Text in audit findings and auditor comments shall:

- be fact-based
- be written in short sentences using precise wordings in present tense, one key statement only per sentence
- indicate whether the non-compliance/-conformance is related to a documentary or an implementation issue (refer to the “PSOE-principle” in [OMM Audit Assessment Options](#))
- inspections be detailed and contain specific information about relevant data (i.e. date, time, weather, description of situation, observed actions).

Examples for finding text based on audits:

- **Not documented** (= “PS..” **NO**) – **not implemented** (= “..OE” **NO**), example IOSA CAB 1.6.5:
Edelweiss does **not ensure** all passenger aircraft in its fleet are equipped with one or more universal precaution kits.
- **Not documented** (= “PS..” **NO**) – implemented (= “..OE” **YES**), example IOSA ORG 2.2.2:
Although implemented, as verified by a comprehensive review of available back-up record files, the scheduled generation of back-up record files for electronic records is **not documented**.
- **Documented** (= “PS..” **YES**) – **not implemented** (= “..OE” **NO**), example IOSA FLT 2.1.28:
Although documented, **no evidence of implementation** can be provided for the monitoring, recording and evaluation of results of successful flight crew evaluations.
- **Documented** (= “PS..” **YES**) – **partially implemented** (= “..OE” **NO**), example EASA CAT.POL.MAB.105:
Evidence of implementation for the verification of the integrity of output data is available for the initial approval of DCS load-sheets. However no evidence of implementation can be provided for the periodic re-evaluation as documented in GOM 12.5.

Note: In a case that Edelweiss decides not to close an observation and in order to generate a correct conformance report, all IOSA observations must be left open. In addition, the observation shall be identified with the finding comment; “RUNNING IOSA

OBSERVATION, MUST REMAIN OPEN TO GENERATE A CORRECT CONFORMANCE REPORT WITHIN IQSMS".

Example:

RUNNING IOSA OBSERVATION - MUST REMAIN OPEN TO GENERATE A CORRECT CONFORMANCE REPORT WITHIN IQSMS

Edelweiss outsources cabin operations functions to external service providers and does not have a program that ensures personnel of external service providers are trained and competent to perform SMS duties.

5.1.7.8 Audit Conclusion

The outcome of an audit is provided by the auditor after consideration of the audit objectives and all audit findings. The audit conclusion will be documented in the management summary.

5.1.7.9 Root Cause Analysis (RCA)

A root cause is defined as a factor that caused a non-compliance or non-conformity and should be eliminated or mitigated through the corrective action. The root cause is the core issue - the highest-level cause - that sets in motion the entire cause-and-effect reaction that ultimately leads to the non-compliance or non-conformity. Proper determination of the root cause(s) is crucial for defining an effective corrective actions to prevent re-occurrence.

Content of a proper Root Cause Analysis (RCA) for:

Level 1 finding:

- 5-Why shall first be performed
- RCA field on the handle finding page in IQSMS: insert and summarise the result of the performed 5-Why analysis (core issue why it happened).

Level 2 finding:

- RCA field on the handle finding page in IQSMS: insert the core issue why it happened (5-Why: optional, on auditor decision)

Example of a possible root cause analysis in the respective RCA field in IQSMS for level 1 and level 2 findings:

- Lack of oversight by nominated person due to short term work

Note: The RCA-process is described in detail in DOC 110 Problem solving guide (Root Cause Analysis).

5.1.7.10 Corrective Action Plan (CAP)

A corrective action plan is the action taken by the auditee to propose a solution to eliminate or mitigate the root cause(s) and prevent re-occurrence of an existing detected non-compliance, non-conformity, or other undesirable condition or situation. The corrective action plan includes a proposed intermediate and/or a long-term correction.

The auditee proposes a solution as described above and the auditor is required to state his feedback indicating whether the proposed solution would point into a direction of solving the issue.

The objective of the Corrective Action Plan (CAP) is to provide preliminary information about the type and extent of the corrective action and correction:

- Brief and specific description of the planned change to correct the finding
- Appropriate and comprehensive enough to address the Root Cause (RCA) and prevent re-occurrence
- Text written in future tense
- **Documentation:** binding statement (i.e. what paragraph will be changed in which manual revision by which date)
- **Implementation:** binding statement, describe the way how and when documented changes will find their sustainable way into daily operations (e.g. by submission of Highlights of Changes (HoC), memos, standardization training, recurrent checking, meeting agenda).

Example of a binding & clear structured Corrective Action Plan (CAP):

- **Change:** Stabilisation criteria will be increased from 1000 ft/AAE to 1500 ft/AAE"
- **Documentation:** OM-A 8.3.2.30.1 will be modified with rev xy, estimated date of publishing ddmmyyyy
- **Implementation:** HoC will be submitted to flight crews in SEP 202x, TRI/E will be standardized in NOV 202x, OP1/2 & LPC/OPC for the year 202x+1 will include stabilized/ de-stabilized scenarios for both PF and PM".

Generic statements, pure repeats or rephrasing and inverting of the findings such as "finding will be corrected to reflect the requirement" do not fulfill the purpose of a Corrective Action Plan (CAP) as the outcome could not be judged by auditors and be visible after the correction only.

Inherent risks of a correction-rejection as potentially not addressing and solving the finding shall be avoided by a Corrective Action Plan (CAP) allowing corrections at an earlier stage than after having worked on the correction going into an undesired direction.

5.1.7.11 Corrective Action

Action to eliminate or mitigate the root cause(s) and prevent recurrence of an existing detected non-compliance, non-conformity, or other undesirable condition or situation.

5.1.7.12 Correction

Action to eliminate a detected non-compliance or non-conformity as proposed by the auditee in the corrective action plan (intermediate and/or long-term correction).

Example for a correction:

- Documentation: CSPM Issue 2, effective 29AUG2022, chapter 5.3.1 published;
- Implementation: standardisation training xyz completed by all CCM via Ilias; or
- Implementation: memo xyz published via Yonder (read and acknowledge).

5.2 Audits and Inspections-Plan

5.2.1 Audit Checklist and Cycle

Edelweiss's audit checklists are based on relevant standards and requirements (refer to [OMM Applicable Regulations, Relevant Standards and Requirements](#)).

The checklists reflect the latest legal requirements as well as the verification of processes and procedures as stated in the respective manuals.

Compliance with these standards/requirements is tracked with the IQSMS software tool. During the review of the individual standards it will be determined if individual standards/requirements are applicable or non-applicable.

Edelweiss audits each applicable standard/requirement as follows:

- EASA Air Operations (IRs and AMCs), in accordance with EU 965/2012 and successive amendments: Annex III (Part ORO), Annex IV (Part CAT) and Annex V (Part SPA), complete audit cycle within 24 months;
- EASA Aircrew (IRs and AMCs), in accordance with EU 1178/2011 and successive amendments: Annex I (Part FCL), Annex V (Part CC) and Annex VII (Part ORA), complete audit cycle within 24 months;
- EASA Continuing Airworthiness (IRs and AMCs), in accordance with EU 1321/2014 and successive amendments: Annex Vc (Part-CAMO) & Annex I (Part M exclusive Subpart F & G), complete audit cycle within 12 months;
- IOSA (Standards and Recommended Practices), in accordance with the ISM (IOSA Standards Manual) Edition in force at any time: Sections ORG, FLT, DSP, MNT, CAB, GRH, CGO and SEC, complete audit within 24-months period of validity;
- New regulation applicable (effective date): difference audit completed latest within 6 months and preferable before the publication of a revision (i.e. OMs).

5.2.2 Audit & Inspection Procedure and Planning Process

5.2.2.1 Overview Audit and Inspection Procedure

Input	Content	Output
Audit/inspection request from the Accountable Manager (ACM)	This process describes: <ul style="list-style-type: none"> • how internal audits / inspections are planned, conducted, supervised and recorded 	Weak points eliminated (including root cause analysis and the link to the risk assessment)
Yearly audit plan		Assessment of the ability of third party subcontractors to provide the required standards
Legal requirements and additional standards (e.g. EASA AIR-OPS, EASA AIRCREW, EASA Part M/CAMO and IOSA)		Audit / inspection report
Internal need for audit / inspection		Feedback to the Accountable Manager (ACM) during CMM face to face meeting
Previous audit findings and the effectiveness of implemented corrective actions		Monthly compliance and conformance monitoring review during the accountable meeting
Relevant organisational changes		SAG meetings
Relevant operational safety or security events		Quarterly Report to the Accountable Manager AOC and its organisation
Need to monitor third party service providers/suppliers as part of the evaluation process		Management evaluation & safety review board (SRB) meeting
Results from previous audit & inspection (performance risk based audit)		

Note: During the establishment of the yearly audit program, a clear focus shall be given on adequate resources and sufficiently trained and qualified auditors.

5.2.2.2 Audit Planning Process

The following table summarises the audit planning process and describes briefly the steps to be taken to create and publish the annual audit plan (refer to [PM 120 OSQ Internal Audit Program Preparation](#) and [DOC 105 OSQ Audit and Inspection Plan](#)).

Task	Re-sponsi-bility	Reference	Tool
Re-evaluation of last audit program	CMM	<ul style="list-style-type: none"> OMM Review of Audit and Inspection Program 	IQSMS
Systematic review for relevant operational safety & security events	CMM	<ul style="list-style-type: none"> OMM Overview Audit and Inspection Procedure 	Accountable meeting minutes Management evaluation & safety review board (SRB) minutes
Create EASA audit plan by OCT for next year ¹	CMM	<ul style="list-style-type: none"> OMM Audits and Inspections OMM Compliance and Conformance Monitoring Audit DOC 106 List of Auditors OMM Auditor Recency and Recurrent Training 	IQSMS, status "audit planned" (blue) <div style="border: 1px solid blue; padding: 5px; margin-top: 10px;"> Note: For audit & inspection settings refer to DOC 56 Auditor Inspector Guide. </div>
Create internal IOSA audit plan by OCT for next year (for odd years only) ¹	CMM	<ul style="list-style-type: none"> OMM IOSA (IATA Operational Safety Audit) & OMM Continuing IOSA Conformity Monitoring OMM Audits and Inspections DOC 106 List of Auditors 	IQSMS, status "audit planned" (blue)
Acceptance by ACM	CMM	<ul style="list-style-type: none"> Face to face meeting with ACM 	IQSMS audit plan <div style="border: 1px solid blue; padding: 5px; margin-top: 10px;"> Note: Signed audit plan becomes a controlled document and is archived for at least five years. </div>

Task	Re-sponsi-bility	Reference	Tool
Publish audit plan by end of NOV	CMM	<ul style="list-style-type: none"> Info mail to assigned auditors and auditees 	Email & IQSMS
Create questionnaires for all assigned audits approximately 90 days before the planned audit date	(Lead) Auditor	<ul style="list-style-type: none"> Only at stage "yellow" automatic notification mails will be sent to both auditor's and auditees 	IQSMS, status "Questionnaire generated" (yellow) Note 4
Prepare audit	(Lead) Auditor	<ul style="list-style-type: none"> Add tailored audit questions which reflect relevant operational safety or security events³ Review previous audit report / findings (if available)² Inform auditee once audit preparation are completed 	IQSMS VOE "auditor comment" DOC 56 Auditor Inspector Guide IQSMS "finished editing the questionnaire" & "send an e-mail informing the auditee(s)" PM 120 OSQ Internal Audit Program Preparation
Prepare audit	Auditee(s)	<p>Preparation shall start 60 days before the planned audit date, and shall be completed not later than 30 days before the planned audit date.</p> <ul style="list-style-type: none"> Complete preparation in the documentation tool Yonder by linking the legal reference to the respective manual chapter. Perform final preparation in IQSMS, pre-insert doc references including upload of documents in IQSMS (auditee-preparation). 	Yonder IQSMS auditee tool IQSMS status "preparation finished" (purple)

Task	Re-sponsi-bility	Reference	Tool
Verification Doc Reference	Auditor	<p>Verification of doc reference shall start 25 days before the planned audit date and shall be completed 5 days before the planned audit date.</p> <ul style="list-style-type: none"> Wrong or missing document references shall be submitted by the auditee before the planned audit date. 	IQSMS status "conduct audit" (orange)
Update of connections	Audi-tee(s)	<ul style="list-style-type: none"> After the audit report is published, the auditee shall receive the audit report and must update the connections legal reference and manual chapter accordingly, in the documentation tool Yonder. 	Yonder

¹ For audits & independent inspections, the NP and his deputy shall be assigned as additional auditee to allow an overview about auditing activities and the status of compliance and conformance assurance in his department.

² Verification of Effectiveness (VOE) (refer to [OMM Verification of Effectiveness \(VOE\)](#)) shall be done for all findings which have been raised in the previous audit. The VOE shall be documented in the field "auditor comment" of the respective requirement/question, or, if available, the respective internal standard shall be used for the documentation of the performed VOE.

Example: VOE #1000.12 -> verification performed and add results/summary of VOE.

³ Source: Compliance communicates highlights taken from management evaluation and safety review board (SRB) meeting minutes to all auditors by the periodic "Auditor Recurrent Training News".

⁴ Hard and soft law

- when setting up an audit, the applicable "soft laws" (AMCs) shall be inserted/selected as well.
- GMs may be selected. However, during the audit, GM shall, after their consultation, be deselected from the audit by ticking each GM to "not audited" (black).

5.2.2.3 Review of Audit and Inspection Program

The audit and inspection program is continuously reviewed and improved by the CMM, who shall generate any amendments and ensure compliance with the current requirements. The audit and inspection plan allows for additional audits and inspections if deemed necessary. Follow-up audits and inspections are scheduled if needed.

5.2.2.4 Audit Extension

A reasonable level of planning flexibility can be granted by the CMM, if the intervals and safety are not affected.

An audit extension request is mandatory and must be presented to the CMM for his approval, whenever an audit cannot be performed (including the publication of its audit report) within 14 days after its planned date according to the Audit Plan, or when the audit cycles defined above will be delayed. For detailed information, see DOC 34 Audit Extension Request.

5.2.3 Subcontractor and Supplier Monitoring

Subcontractor and supplier monitoring are held either as an evaluation before the conclusion of the supply contract or as performance monitoring of compliance in the course of the supply process.

The audit plan within "TEAMS GRP-OSQ-Audits – Dokumente" lists all current aviation law relevant (ALR) subcontractors and defines the method of monitoring:

- Independent inspection
- Department inspection
- Desktop audit
- Onsite audit

The Compliance Monitoring Manager and the respective Nominated Person evaluate the most appropriate method for monitoring the subcontractor by considering a risk-based approach and factors of the supplied services such as:

- Safety relevance
- Complexity
- Operational and commercial importance
- Amount, volume and periodicity

Refer to [OMM Continuous Monitoring of Contractors](#).

For ground operations, security, cargo and maintenance, the audit cycle/interval has been established as follows:

Area/Section	Re-mark	Audit Interval
Part CAMO LX Technics ZRH	OSQ	max. 24 months
Part 145 LX Technics hangar and line maintenance ZRH	OSQ	max. 24 months
Swiss World Cargo	OSQ	max. 36 months
Part 145 line stations abroad	TMM	max. 36 months
Ground handling stations - all	OG/OG A	max. 36 months
Aviation Security	OSY	max. 60 months

Note: If the organisation changes in a significant way, an audit has to be performed within 90 days after the implementation of this new structure.

Note: The audit cycle for all other subcontractors and suppliers is defined in the respective annual audit plan.

5.2.3.1 Ground Operations and Cargo Audit Plan

The audits are performed following the OGA – Audit Plan, which is stored within ‘TEAMS GRP-OSQ-Audits – Dokumente’.

Development and update of the audit plan are performed in close cooperation with the CMM to ensure functional control. Meetings for ensuring compliance standards and continuous improvements shall be held at least every two months with the CMM.

Supervision control is ensured by the NPGO. OGA coordinates all audits with the OG auditors and updates their audit plan. If the defined maximum audit interval cannot be adhered to, OGA triggers audit extensions in accordance with the [OMM Audit Extension](#).

OGA monitors and records all findings within OGA/OG.

5.2.3.2 Line Maintenance Audit Plan

The audits are performed following the TMM – Audit Plan, which is stored within ‘TEAMS GRP-OSQ-Audits – Dokumente’.

Development and update of the audit plan are performed in close cooperation with the CMM to ensure functional control. Meetings for ensuring compliance standards and continuous improvements shall be held at least every two months with the CMM.

Supervision control is ensured by the NPCA. TMM keeps control of shared audits with LX and, as applicable, with Swiss Technics. If the defined maximum audit interval cannot be adhered to, TMM triggers audit extensions in accordance with the [OMM Audit Extension](#).

TMM monitors and records all findings within TMM.

5.2.3.3 Security Audit Plan

The audits are performed following the OSY – Audit Plan, which is stored within ‘TEAMS GRP-OSQ-Audits – Dokumente’.

Development and update of the audit plan are performed in close cooperation with the CMM to ensure functional control. Meetings for ensuring compliance standards and continuous improvements shall be held at least every two months with the CMM.

Supervision control is ensured by the SEO. OSY coordinates all audits with the OSY auditors and updates their audit plan. If the defined maximum audit interval cannot be adhered to, OSY triggers audit extensions in accordance with the [OMM Audit Extension](#).

OSY monitors and records all findings within OSY.

5.2.4 Audits performed by an Authority

Authorities (e.g. FOCA) regularly performs audits and inspections at Edelweiss as part of their regulatory oversight responsibility. The following process ensures orderly communication within Edelweiss. Authority audits or inspections shall always be tracked within the audit tool IQSMS. Refer to [PM 126 OSQ EDW Supplier & FOCA/IOSA Audit](#).

The following table summarises the process associated with performed audits by the authority and describes briefly the steps to be taken by the NP and CMM.

Task	Re-sponsi-bility	Actions	Remarks / Tools
Announcement	NP	Inform CMM about oversight audit/inspection by FOCA	Via e-mail compliancemonitoring@flyedelweiss.com
IQSMS audit preparation	CMM	Creation of a FOCA audit	IQSMS FOCA information attached to the audit
audit plan update	CMM	Up-date of the yearly audit plan	GRP-OSQ-Audits, 01) Compliance Monitoring Management, Auditplan yyyy-yy

Task	Re-sponsi-bility	Actions	Remarks / Tools
auditee team	NP	All required competent personnel invited in order to be present during the audit	OSQ representative may be invited as well (on request by NP)
FOCA audit report	NP	Forward/distribute FO-CA audit report	Via e-mail compliancemonitoring@flyedelweiss.com
Tracking of Finding	CMM	Up-date according to the FOCA report (raised finding)	IQSMS PM 124 OSQ Tracking of Findings FOCA report attached to the audit
Handling of Finding	NP	Handling of finding	IQSMS Refer to OMM Findings Raised by an External Audit Organisation
FOCA closing report	NP	Forward/distribute FO-CA closing report	via e-mail compliancemonitoring@flyedelweiss.com
IQSMS closure	CMM	Up-date of the IQSMS and close the findings	IQSMS FOCA closing report attached to the audit/finding

5.2.5 Continuing IOSA Conformity Monitoring

Edelweiss is a registered IOSA carrier and therefore ensures IOSA standards and recommended practices are a substantial part of the Compliance Monitoring System. All ISARPS are audited at least once during the IOSA registration period. The Regulation Assignment ([OMM Program](#)) is updated according to the effective IOSA Standards Manual. Necessary changes are incorporated into the audit plan.

Edelweiss makes use of the IATA defined Auditor Actions (AAs) as a basis during its audits. AAs should be accomplished unless there are particular conditions that either prevent the completion of an AA or in case clear evidence was already obtained. Clear focus shall be given to the verification of the implementation and the auditor actions shall be applied to a depth that the auditor gets clear evidence for a proper implementation.

When sampling, a representative amount of relevant samples shall be verified by the internal IOSA auditor as follows:

- quantity: as many samples as required to verify specific evidence for implementation (e.g. not less than three samples if applicable)
- timeframe: evenly distributed over a period of the last 24 months

- random picking: the internal auditor shall pick samples by himself.

Mandatory Observations (MO) do not have to be performed during internal IOSA audits. If performed, the mandatory observation shall be recorded on the “ISM Ed. X – Audit Observation Checklist (XYZ)” provided by IATA.

5.3 Audits and Inspections

5.3.1 Compliance and Conformance Monitoring Audit

A compliance and conformance monitoring audit is used to confirm that policies, structures, facilities, resources and procedures are and remain relevant to the company's operation and are effective in maintaining the Edelweiss compliance and conformance monitoring standards. The primary purpose of a compliance and conformance monitoring audit is to identify, in an objective fashion, potentially unsatisfactory policies, procedures or practices before they cause an accident or an incident.

Compliance and conformance monitoring audits shall ensure that Edelweiss:

- complies with applicable regulations and standards
- satisfies stated operational needs
- identifies areas requiring improvement
- identifies hazards to operations
- monitors effectiveness of safety risk controls

5.3.1.1 EASA Part Air OPS

- Annex III Part-ORO, Subparts:
 - GEN – General Requirements
 - AOC – Air Operator Certification
 - MLR – Manuals, Logs and Records
 - SEC - Security
 - FC – Flight Crew
 - CC – Cabin Crew
 - FTL – Flight and Duty Time Limitations and Rest Requirements
- Annex IV Part-CAT, Subparts:
 - A – General Requirements
 - B – Operating Procedures
 - C – Aircraft Performance and Operating Limitations
 - D – Instruments, Data, Equipment
- Annex V Part-SPA, Subparts:
 - A – General Requirements
 - B – PBN Operations
 - C – Operations with specified Minimum Navigation Performance (MNPS)
 - D – Operations in airspace with Reduced Vertical Separation Minima (RVSM)

- E – Low Visibility Operations (LVO)
- G – Transport of Dangerous Goods
- M – Electronic Flight Bags (EFB)
- Annex VIII Part-SPO:
 - Subpart E – Specific Requirements:
 - Section 5 – Maintenance Check Flights (MCF)

5.3.1.2 EASA Part Air Crew

- Annex I Part FCL, Subparts:
 - Subpart A – General Requirements
 - Subpart F – Airline Transport Pilot Licence - ATPL
 - Subpart H – Class and Type Ratings
 - Subpart J – Instructors
 - Subpart K – Examiners
 - Appendixes
- ANNEX V Part CC, Subparts:
 - Subpart GEN – General Requirements
 - Subpart CCA – Specific Requirements for the Cabin Crew Attestation
 - Subpart TRA – Training Requirements for Cabin Crew Attestation Applicants and Holders
 - Appendix
- Annex VII Part ORA, Subparts:
 - GEN – General Requirements
 - ATO – Approved Training Organisations

5.3.1.3 EASA Part M & CAMO

- Subpart A – General
- Subpart B – Accountability
- Subpart C – Continuing Airworthiness
- Subpart D – Maintenance Standards
- Subpart E – Components
- Subpart I – Airworthiness Review Certificate
- Part CAMO – Continuing Airworthiness Management Organisation Quality Audit of Aircraft

5.3.1.4 IOSA (IATA Operational Safety Audit)

All IOSA standards and recommended practices must be audited at least once every 24 months.

- section 1 – Organisation and Management System (ORG) (management and control / documentation and records / safety management / emergency response)

- section 2 – Flight Operations (FLT) (management and control / training and qualification / line operations / operations engineering specifications)
- section 3 – Operational Control and Flight Dispatch (DSP) (management and control / training and qualification / line operations / operational control requirements and specifications)
- section 4 – Aircraft Engineering and Maintenance (MNT) (management and control / maintenance control / technical records / maintenance organisations)
- section 5 – Cabin Operations (CAB) (management and control / training and qualification / line operations / cabin systems and equipment)
- section 6 – Ground Handling Operations (GRH) (management and control / training and qualification / ground handling operations / special aircraft ground handling operations)
- section 7 – Cargo Operations (CGO) (management and control / training and qualification / acceptance and handling)
- section 8 – Security Management (SEC) (management and control / training and qualification / security operations (security threat and contingency management)

5.3.2 Independent Monitoring

To be effective in providing the management with confidence about the reliability of its operation, compliance and conformance monitoring is free to act independently of routine management.

Audits and independent inspections as an instrument for compliance or conformance assurance are carried out by personnel not being directly responsible for the:

- function
- procedure
- products.

The purpose of this limitation as given by EASA and IOSA is to prevent employees inspecting or auditing either procedures which were defined on their own (e.g. manuals, processes or procedures written by themselves) or any activities they are responsible for as direct superiors.

The fact that all employees, whether acting internally or externally, are on Edelweiss' payroll and could then be judged as not being fully independent is not in conflict with this regulation.

Auditing and inspecting requires very detailed subject related knowledge, competence and awareness about internal work flows or organisational set-ups. In any kind of

auditing or inspecting, a potential conflict of interest between specific knowledge and independence can only be mitigated by strong characters of auditors and inspectors who rank evidence based results higher than purely social relations.

5.3.3 Remote Monitoring

The main focus is on on-site monitoring activities. However, under special circumstances a remote monitoring may be used instead of an on-site monitoring. For remote monitoring, the following shall apply:

- Audit planning:
 - The lead auditor must request an audit to be carried out remotely. The decision for a remote audit shall be at the discretion of the Compliance Monitoring Manager (CMM).
 - In general, all procedures described in [OMM Compliance and Conformance Management](#) are applicable to remote monitoring.
 - A internet connection suitable for transmitting information and video call & conferences shall be available (e.g. mobile network or WiFi).
 - Detailed audit plan that includes scheduled calls and persons to be interviewed shall be announced.
- Documentation:
 - Much of the documentation that will be reviewed during the monitoring shall be gathered, organized and available in advance (auditee preparations).
 - Validating documentation assessment results during the remote calls and interviews.
- Implementation:
 - Observing records and evidences through shared images or screens
 - Observing the operation through live video broadcasting
 - Increasing of sampling size whenever possible, to compensate for the lack of on-site monitoring of operations.

Note: The remote method of auditing shall be avoided whenever possible. Audit reports and related records shall indicate the extent to which remote technology has been used in carrying out the remote audit, including any item that was not able to be completely reviewed.

5.3.4 Pool Audits

Pooled Audits (e.g. IATA Audits) are not accomplished by Edelweiss auditors. Presently Edelweiss is using the following pool audits:

- De-Icing/Anti-Icing Quality Control Pool (DAQCP);
- Fuel Quality Pool (IFQP);
- Drinking-Water Quality Pool (IDQP).

OGA has full access to audit reports within the IATA Homepage. Results and further planning are discussed during the pooled audits meetings three times a year, whereas OGA reports to the CMM.

5.3.5 Shared Audit

Shared Audits are performed by one organization (e.g. LX) and shared based on a contract between the operators (e.g. WK).

5.3.6 Security Audits

The Security Manager is responsible to audit and evaluate the security management system and operational functions at a determined frequency following a regularly performed risk assessment.

The Security Manager refers to NASP (National Civil Aviation Security Program) as well as with ACSP (Edelweiss Air Security Manual). For the Security Audits process, refer to Chapter 16 of the ACSP.

Security audits are performed by the Security Department and its contents are considered confidential.

The Security Manager establishes a yearly audit plan based on the risk & threat analysis.

5.3.7 Process Audits

Process Audits are planned within the Audit Assignment, see DOC 105 OSQ Audit and Inspection Plan. A process audit shall be a highly focused inspection of internal systems, processes, and organisations. Internal process audits focus on departmental processes, compare activities against predetermined standards to reveal inefficiencies and improvement areas. Separate processes must be properly controlled by a management system to streamline flows and efficiency.

5.3.8 Department Inspections under NP / Manager's Responsibility

Each NP (and some dedicated managers) maintain a system of regular inspections in order to create a valid testimony about the state of compliance and conformance with standards during the daily operation. Regular inspections address all aspects of the operation, training and maintenance, including qualification and proficiency checks of flight and cabin crew members and other operations personnel as well as spot checks of various aspects of the operation.

The primary purpose of supervision is to verify that established procedures are followed and that the required standards are achieved.

5.3.8.1 Scope of Department Inspection - Compliance and Conformance Supervision

Following scopes are supervised for compliance and conformance:

Responsible	Inspection Scope
OC	Flight Duty Limitation (cockpit) Load Control (mass and balance) Flight Planning Documentation EFB Performance
OT	EDW Training Facilities Training Standards Tracking of KPI & SPI Reporting - Documentation Inspection of subcontractor Simulator
OP	OPC Cockpit Planning OPK Cabin Planning OPR Crew Control OPL OPL Licensing & Training Planning
OG	FOO Competency Check (Dispatch) Integrity of mass and balance data & document check
T	Refer to EDW CAMO Inspection Concept. <i>Note: T has got direct access to LX AMOS.</i>
PCO	Cabin inventory on every aircraft
OSF	OSF monthly internal inspection
OSQ	OSQ monthly internal inspection
OSY	OSY monthly internal inspection (review of performed security audits in regards to RCA, risk assessment and corrective action process to ensure effectiveness in preventing future incidents or occurrences)
Refer to OMM Manual Library	Yearly systematic review of the assigned OMs and sub-manuals of the OMs (e.g. checking the general structure of the manuals and obvious inconsistencies)
Head of Department or NP	Yearly systematic review of changes in the Edelweiss Safety Management System, the Safety Culture and the Safety & Security Policy. Active exchange and/or training of the subcontractor / service provider to address and meet the following Edelweiss standards or requirements:

Responsible	Inspection Scope
	<ul style="list-style-type: none"> • SMS • Security (incl. information security) <p>An active exchange is considered as web base training (WBT), read & sign do, on-site training etc.</p>

Additional to the table above, all Nominated Persons (OC, OG, T, OT) and other departments (OS, OSY, P etc.) may perform additional inspections to fulfil the duties according to their responsibilities (Leistungsauftrag). Therefore the list above is not exhaustive and subject to change.

5.3.8.2 Frequency of Department Inspection - Compliance and Conformance Supervision

Department compliance and conformance supervision is performed according to department's activities and decision by the head of department or NP.

5.4 Auditors and Inspectors

5.4.1 Code of Conduct

The audit or inspection:

- contributes to the success of Edelweiss
- verifies safety assurance
- is objective and is based on procedures, processes and legal requirements
- creates results of and success for all participants
- creates improvements
- is process orientated and transparent

Auditors and inspectors must be impartial and independent from operational areas to be audited, which means neither responsible for the function, services nor products.

5.4.2 Auditor Responsibility and Authority

5.4.2.1 Responsibility

The auditors/inspectors are responsible for:

- Preparing and conducting audits according to the described and applicable procedures (i.e. [OMM Compliance and Conformance Management](#), relevant DOCs).
- Supporting and motivating auditees in audit preparation to perform root cause analyses, Corrective Action Plans and corrections within the defined time frame.

- Issuing audit reports in the IQSMS tool.
- Performing a formal audit closure meeting.
- Monitoring corrective actions arising from audits: Approving or accepting Corrective Action Plans, corrective actions, corrections and Verification of Implementation.
- Performing a finding risk assessment → delegated to the risk controller.
- Performing a Verification of Effectiveness.
- Closing of finding.
- Creating and cultivating compliance and conformance monitoring awareness.

Note: The audits to be performed by each auditor must be in accordance with his job description (Leistungsauftrag). Additional duties and responsibilities of auditors may also be specified/indicated there.

5.4.2.2 Authority

Auditors have the authority to:

- access all departments and documents required to fulfill their task
- request required support by CMM to fulfill their tasks
- accept or decline auditees request for extension of finding due dates
- require certain persons to provide information or explanations as necessary for the performance of their duties.

Note: Every auditor is automatically qualified to perform inspections.

5.4.3 Auditor Qualification Requirements

EDW ensures that compliance monitoring personnel has the appropriate level of training that develops competency in auditing skills and techniques and experience to conduct auditing and evaluation against all applicable EDW standards.

5.4.3.1 Prerequisites

Auditors must have and demonstrate relevant knowledge, background and experience as appropriate to the activities being audited or inspected, including knowledge and experience in compliance and conformance monitoring.

5.4.3.2 Biography

A candidate shall have:

- completed at least secondary education (e.g. abgeschlossene Berufsausbildung (EFZ) oder Maturität)
- completed an auditor training by an accredited training organisation (for internal IOSA Auditors in addition at least a completed IAAT or IAT)

- at least two years of total work experience in the area to be audited, except for all Flight- and Training-Sscopes where a total of three years of operational aviation experience is needed.

5.4.3.3 Knowledge and Skills

A candidate for an auditor shall have:

- knowledge in compliance and conformance monitoring and safety audit principles
- auditing skills and techniques in accordance with ISO 19011 standard or equivalent
- knowledge of EASA and local regulation in the field he is supposed to audit
- be familiar with Edelweiss Operation Manuals (OM)
- English language: speaking, reading and writing at least equivalent to ICAO “extended level 4”
- good knowledge of MS Office
- thorough knowledge about the content of manuals that comprise the IOSA documentation system (IPM, ISM, IAH & IRM).

5.4.3.4 Additional Knowledge and Skills for Part M / CAMO Auditor

In addition to the above knowledge and skill requirements, a Part-M auditor shall have:

- attended an EASA Part-M/CAMO course
- completed training for fuel tank safety level 1
- knowledge of and be familiar with Edelweiss CAME.

5.4.3.5 Additional Knowledge and Skills for External Auditor / Inspector

In addition to the above knowledge and skills requirements, an external auditor shall have:

- completed at least five audits within the area to be planned to audit.

5.4.4 Auditor Selection Procedure

Edelweiss gathers evidence to verify compliance with [OMM Auditor Qualification Requirements](#). If these prerequisites are fulfilled, the candidate will be invited for a selection to ascertain adequate knowledge as stated in [OMM Knowledge and Skills](#).

5.4.4.1 Nomination

The Compliance Monitoring Manager together with the Accountable Manager nominates auditors within OSQ for internal audits and inspections and within OGA, OG and TMM for supplier audits.

5.4.5 External Personnel used to perform Audits / Inspections

If external personnel are used to perform compliance audits or inspections:

- any such audits or inspections are performed under the responsibility of the Edelweiss Compliance Monitoring Manager (CMM);
- Edelweiss remains responsible to ensure that the external personnel have relevant knowledge, background and experience as appropriate to the activities being audited or inspected; including knowledge and experience in compliance and conformance monitoring;
- Edelweiss retains the ultimate responsibility for the effectiveness of the compliance and conformance monitoring function in particular for the effective implementation and follow-up of all corrective actions.

5.4.5.1 Administration

External sources may act as internal auditors after:

- a contract with specific documented requirements has been signed by both parties;
- a familiarization training according to OMM has been completed.

5.4.6 Auditor Initial Training Program

Before auditing under supervision as an internal auditor, theoretical instruction is given as follows:

- Compliance and conformance monitoring procedures and practices ([OMM Compliance and Conformance Management](#))
- Initial Advanced Management System Training (DOC 49)
- IQSMS tool (role as auditor)
- Familiarization training of audited scope within Edelweiss
- AVSEC (only applicable for security audits/inspections)
- Load control familiarization (if candidate is not experienced) (only applicable for ground operations auditor)
- DGR awareness training (only applicable for ground operations auditor)
- Regulation training of EASA Air Ops / EASA Air (if required).

After having received theoretical knowledge instruction, auditing under supervision starts as follows:

- candidate observes a portion of the discipline to be qualified
- candidate audits in the discipline to be qualified under supervision of an experienced auditor (at least 1 audit)¹

Once the training and evaluation is successfully completed, the auditor is entitled to audit the assigned scopes according to DOC-106 List of Auditors.

¹ This procedure applies for each additional discipline being assigned after completion of the initial training.

5.4.7 Auditor Recency and Recurrent Training

5.4.7.1 Recency

The minimum amount of audits to be performed to maintain an appropriate level of current audit experience is:

- two audits per calendar year (EASA and IOSA count equally).

5.4.7.2 Recurrent Auditor Training

An internal auditor stays current by:

- self-study of changing requirements (EASA, IOSA & local requirements)
- attending an audit refresher course at least every 24 months in any area relevant to the scopes being audited (contents based on ISO 19011).

At latest every 24 months, the auditors shall join a refresher training which includes shared experience from previous audits. This training is mandatory for all auditors.

The content for the refresher course is specific for every recurrent training and may cover:

- Review of the past audit period
- Regulatory changes and amendments
- Risk Assessments/Analysis of Findings.
- Compliance and conformance monitoring procedures and practices, changes and amendments (OMM Ch 5 Compliance and Conformance Management)
- Actual issues and news
- IQSMS tool best practices
- Exchange of experience and information
- IOSA Auditor training refresher (only applicable for Auditors auditing the IOSA ISARPs internally)
- Outlook of the next audit period.

Exception for the recurrent auditor training: IOSA auditors certified by an IATA Audit Organisation (AO), who conduct internal IOSA audits only.

5.4.8 Auditor Evaluation

After completion of the initial training and subsequently at least every 24 months, an evaluation is performed (refer to DOC 59 Auditor Evaluation Form) by an evaluation auditor assigned by the Compliance Monitoring Manager (CMM) according to DOC 106 List of Auditors.

5.5 Audit Findings

In general, a finding shall be raised if one or more elements of "PSOE" are not fulfilled (refer to [OMM Audit Assessment Options](#)). Before the audit closure, the auditor shall systematically questioning the raised findings whether:

- compliance/ non-compliance, conformity/ non-conformity is affected
- related to a documentary or an implementation issue
- level of non-compliance based on the relevance of safety/security
- finding text written according [OMM Audit Finding](#).

Before a finding is considered to be valid, the auditor must have gained a clear picture of options about realistic closing actions to be taken by the auditee while applying reasonable efforts within his own area of competence.

Findings addressing issues which are beyond the auditee's jurisdiction imply the risk of a potential failure to close them.

Therefore, findings pointing towards such kind of more systemic issues beyond the auditee's area of competence shall be raised at the appropriate management levels.

5.5.1 Audit Closure Meeting

The findings will be discussed at the audit closure meeting, which will normally be with the auditee, NP or a person designated to accept responsibility for the findings. The auditor will request that the auditee acknowledges that he accepts the findings.

Deadlines are clear and next steps of the process evaluation of corrective actions and corrections ([OMM Process Evaluation of Corrective Actions](#)) are clear w/o any doubt.

Auditors are encouraged to discuss with the auditees how the finding may have occurred, how the root cause may be identified.

5.5.2 Process Evaluation of Corrective Actions

The general process associated with a finding is described in [PM 124 OSQ Tracking of Findings](#) and DOC 82 IQSMS - Anleitung Audit-Finding Bearbeitung – Auditee.

The following table summarises the process associated with findings and describes the steps to be taken by the auditor and auditee.

Task	Responsibility	Actions	Remarks
0 - Finding			
Finding	Auditor	Open	<p>Closure meeting performed (refer to OMM Audit Closure Meeting)</p> <p>Note: The audit report shall be published not later than 14 days after the on-site or remote audit.</p>
Finding validation	CMM	Validate the finding before the audit closure.	If required
1 – Risk Assessment			
Risk assessment	Risk Controller	Perform	Refer to Note ²
2 – Root Cause Analysis (RCA)			
RCA	Auditee	Create	<ol style="list-style-type: none"> 1. If required, a 5-Why analysis shall be performed first (refer to OMM Root Cause Analysis (RCA)). 2. RCA field on the handle finding page: Insert the final root cause according to the performed 5-Why analysis (core issue). <p>Note: Task 2 must be completed within 30 days of the audit report publication.</p>
3 – Corrective Action Plan (CAP)			
CAP	Auditee	Describe the intended plan for how to	Refer to Note ¹

Task	Responsibility	Actions	Remarks
		eliminate or mitigate the root cause and to eliminate the cause of non-compliance or non-conformity.	<p>Note: Task 3 must be completed within 30 days of the audit report publication.</p>
4 – Evaluation of RCA & CAP			
Evaluation of RCA & CAP	Auditor	Feedback to auditee	<p>If the RCA/CAP is accepted, the finding status will be set to “in progress”.</p> <p>Refer to Note¹</p> <p>Note: Task 4 must be completed within 5 days after the RCA/CAP are available.</p>
5 - Correction			
Correction	Auditee	<p>Describe the performed action to eliminate a detected non-compliance or non-conformity.</p> <p>Describe the performed action to mitigate or eliminate the root cause.</p>	<p>Do not proceed with the correction until the auditor has commented (feedback/input) on the performed RCA/CAP.</p> <p>If the correction is accepted, the finding status will be set to “closed” or “internally closed”.</p> <p>Refer to Note³</p> <p>Note: Task 5 must be completed within 90 days of the audit report publication.</p>
6 – Evaluation of Correction			
Evaluation of correction	Auditor	Feedback to auditee	<p>Refer to Note^{3,4}</p> <p>Note: Task 6 must be completed within 5</p>

Task	Responsibility	Actions	Remarks
			days after correction is available.
7 – Verification of Implementation (VOI) & Effectiveness (VOE)			
VOI/VOE	Auditor		Refer to Note ⁴

¹ The implementation of a specific and binding, comprehensive and permanent corrective action shall only be done after completion of the root cause analysis. The CAP shall be formulated (written) in accordance with [OMM Corrective Action Plan](#). Afterwards, the auditor evaluates and verifies the RCA and the CAP. A mandatory comment (feedback/input) will be given to the auditee.

Without any “acceptance” comment (“go ahead” by the auditor), no further actions are allowed by the auditee (do not proceed with the correction). Once RCA and CAP have been accepted by the auditor the finding status will be set to “in progress”.

² Risk assessment of findings is based on the [OMM Severity](#) table and [OMM Probability \(Likelihood\)](#) table.

The risk controller must perform a risk analysis within the IQSMS for each level 1 and level 2 finding. He shall do this after the completion of the Root Cause Analysis.

³ Until the auditor has given his “go ahead” (feedback/input) for the performed RCA/CAP, correction shall not be started by the auditee.

Once the correction is accepted by the auditor his conclusion is inserted in the comment field, and the finding status will either be set to “closed” once all is finished (i.e. documented/implemented) or “internally closed” in case of available “Yonder change request” and required acceptance or approval of adopted manuals by FOCA.

Note: If a Yonder CR is associated with a finding, the reference of the finding must be clearly indicated within the CR.

When changing the finding status from “internally closed” to “closed”, the auditor shall verify the published revision (not editing drafts) and insert the document reference (e.g. publication of OM Issue 2, 30.11.2022, chapter 5.1 verified).

The auditor compares the manual references used in the correction with the selected manual references during the audit phase. If required, update the selected manual references accordingly before the finding status is set to “closed”.

⁴ If the correction for the non-compliance or non-conformity is completed and accepted by the auditor, but, for instance, the mitigation of the root cause is not completed/implemented (e.g. flight safety conferences will be attended in December 2024), or there is a doubt regarding the effectiveness (refer to [OMM Verification of Effectiveness \(VOE\)](#), then:

- The finding status will be set to “closed”.
- “Verification of Implementation” shall be set to “Yes”, and the proposed date for the completed root cause mitigation or the planned date for the effectiveness check shall be selected.

Note:

- In the case of audits of suppliers or external service providers, the general process described above may be flexibly adapted by the auditor to consider the peculiarities of each audit, refer to [OMM Subcontractor and Supplier Monitoring](#).
- For suppliers or external service providers, the lead auditor has the responsibility to guide the corrective action process in the most logical way to get the best possible result and eliminate the detected non-compliance or non-conformity.
- If the IQSMS cannot be used/accessed by an auditee of a supplier or external service provider, the auditor enters the statement on behalf of the auditee.

5.5.2.1 Findings Raised by an External Audit Organisation

The general process associated with a finding is described in [PM 124 OSQ Tracking of Findings](#) and [DOC 82 IQSMS - Anleitung Audit-Finding Bearbeitung – Auditee](#).

The following table summarises the process associated with findings raised by an external audit organisation (e.g. FOCA, IOSA, Partner-Monitoring and others). The process shall be handled as follows:

Task	Responsibility	Actions	Remarks
0 - Finding			
Notification of finding by the external audit organisation	CMM	Set up an IQSMS audit if not already prepared.	Distribution of the finding including to the responsible auditee(s).
1– Root Cause Analysis (RCA)			
RCA	Auditee	Create	1. A 5-Why shall first be performed for each finding.

Task	Responsibility	Actions	Remarks
			<p>2. RCA field on the handle finding page: Insert the final root cause according to the performed 5-Why analysis (core issue).</p> <div style="border: 1px solid blue; padding: 5px; margin-top: 10px;"> Note: Task 2 must be completed within 30 days of the audit report publication. </div>
2 – Risk Assessment			
Risk assessment	Risk Controller	Perform	Refer to Note ²
3 – Corrective Action Plan (CAP)			
CAP	Auditee	Describe the intended plan on how to eliminate or mitigate the root cause and to eliminate the cause of non-compliance or non-conformity.	<div style="display: flex; align-items: flex-end;"> <div style="flex: 1;"> Refer to Note¹ </div> <div style="flex: 1; border: 1px solid blue; padding: 5px; margin-left: 10px;"> Note: Task 3 must be completed within 30 days of the audit report publication. </div> </div>
4 – Evaluation & forwarding of RCA/CAP			
Evaluation of RCA & CAP	CMM	Forward RCA and CAP to the external audit organisation.	<div style="display: flex; align-items: flex-end;"> <div style="flex: 1;"> Create a PDF of the handling finding page "corrective action record (CAR)" including attachments. Refer to Note¹ </div> <div style="flex: 1; border: 1px solid blue; padding: 5px; margin-left: 10px;"> Note: Task 4 must be completed within 5 days after RCA/CAP are available. </div> </div>
5 – Response of RCA/CAP			

Task	Responsibility	Actions	Remarks
Response by the external audit organisation	CMM	Insert response into IQSMS (copy-paste).	<p>If the external audit organisation accepts the RCA/CAP, the finding status will be set to "in progress".</p> <p>Refer to Note¹</p> <div style="border: 1px solid blue; padding: 5px; margin-top: 10px;"> Note: Task 5 must be completed within 5 days after the response of the external audit organisation. </div>
6 - Correction			
Correction	Auditee	<p>Describe the performed action to eliminate a detected non-compliance or non-conformity.</p> <p>Describe the performed action to mitigate or eliminate the root cause.</p>	<p>Do not proceed with the correction until the CMM has commented (feedback/input from the external audit organisation) on the performed RCA and CAP.</p> <p>If the correction is accepted, the finding status will be set to "closed" or "internally closed".</p> <p>Refer to Note³</p> <div style="border: 1px solid blue; padding: 5px; margin-top: 10px;"> Note: Task 6 must be completed within 90 days of the audit report publication. </div>
7 – Evaluation & forwarding of Correction			
Evaluation of correction	CMM	Forward correction to the external audit organisation.	<p>Create a PDF of the handling finding page "corrective action record (CAR)" including attachments.</p> <p>Refer to Note³</p>

Task	Responsibility	Actions	Remarks
			<p>Note: Task 7 must be completed within 5 days after correction is available.</p>
8 – Response of Correction			
Response by the external audit organisation	CMM	Insert response into IQSMS (copy-paste).	<p>If the external audit organisation accepts the correction, the finding status will be set to “closed”</p> <p>Refer to Note^{3,4}</p> <p>Note: Task 8 must be completed within 5 days after the response of the external audit organisation.</p>
9 – Verification of Implementation (VOI) & Effectiveness (VOE)			
VOI/VOE	CMM		Refer to Note ⁴

¹ The implementation of a specific and binding, comprehensive and permanent corrective action shall only be done after the completion of a 5-Why root cause analysis (RCA). The CAP shall be formulated (written) in accordance with [OMM Corrective Action Plan](#).

Afterwards, the CMM and the external audit organisation evaluate and verify the 5-Why analysis and the CAP. A mandatory comment (feedback/input) will be given to the auditee.

Without any comment “acceptance” (“go-ahead” by the external audit organisation via CMM), no further actions are allowed by the auditee (do not proceed with the correction).

Once RCA and CAP have been accepted by the external audit organisation, the finding status will be set to “in progress” by the CMM.

² The risk assessment of findings is based on the [OMM Severity](#) table and the [OMM Probability \(Likelihood\)](#) table.

The risk controller must perform a risk analysis within IQSMS for each level 1 and level 2 finding. He shall do this after the completion of the Root Cause Analysis (RCA) and it

must be completed within 60 days after the audit report publication

³ Until the external audit organisation has given its “go-ahead” (feedback/input) for the performed RCA/CAP (done via CMM), correction shall not be started by the auditee.

Once the correction is accepted by the external audit organisation, the CMM inserts the conclusion in the comment field. The finding status will either be set to “closed” once all is finished (i.e. documented/implemented) or to “internally closed” in case of available “Yonder change request” and required acceptance or approval of adopted manuals by FOCA.

Note: If a Yonder CR is associated with a finding, the reference of the finding must be clearly indicated within the CR.

When changing the finding status from “internally closed” to “closed”, the CMM shall verify the published revision (not editing drafts) and insert the document reference (e.g. publication of OM Issue 2, 30.11.2022, chapter 5.1 verified).

The CMM compares the manual references used in the correction with the selected manual references during the audit phase. If required, update the selected manual references accordingly before the finding status is set to “closed”.

⁴ If the correction for the non-compliance or non-conformity is completed and accepted by the CMM, but, for instance, the mitigation of the root cause is not completed/implemented (e.g. flight safety conferences will be attended in December 2024) or there is doubt regarding the effectiveness (refer to OMM Verification of Effectiveness (VOE), then:

- The finding status will be set to “closed”.
- “Verification of Implementation” shall be set to “Yes” and the proposed date for the completed root cause mitigation or the planned date for the effectiveness check shall be selected.

5.5.3 Verification of Effectiveness (VOE)

In order to verify the effectiveness of corrections taken, previously raised findings shall be evaluated after a certain period of time, e.g. the next audit or independent inspection. During this verification process it shall be checked, whether the corrections taken were correct and effective and the root cause clearly eliminated.

During the [OMM Process Evaluation of Corrective Action](#), Verification of Effectiveness (VOE) shall be applied if one of the following factors is evident:

- increased potential for re-occurrence
- correction with increased complexity
- effectiveness of correction might be in doubt due to any reason.

Note: Before or latest during the conduction of an audit, the auditor shall check the previous audit report (if available). If findings have been raised during the previous audit, the verification of effectiveness of all those findings shall be applied before or latest during the conduction of the planed audit. For more information refer to [OMM Audit Planning Process](#).

5.5.4 Distribution of the Audit Report

The Audit Report (Management Summary) with the information regarding the raised findings shall be sent by the lead auditor trough the IQSMS to:

- every assigned auditee
- the associated responsible person(i.e. NP, Head of)
- the respective risk controlle
- the ACM and CMM (sent by IQSMS as per default).

Note: The audit report shall be published / sent not later than 14 days after the on-site or remote audit.

5.5.5 Management and Control of Findings

The NP and/or responsible manager must monitor the findings and progress.

The auditee must monitor progress, adequately plan the required tasks and, in case support is required, approach the auditor as early as possible in order to avoid overdue findings.

5.5.6 Finding Extension

5.5.6.1 General

Overdue findings shall be avoided and pro-actively handled by the assigned auditee and under the responsibility of the NP.

It is not allowed to extend a level 1 finding. The final decision on how to proceed can only be taken by the Accountable Manager with support of the CMM.

If the due date of a level 2 finding or an observation needs to be extended, the auditee shall submit an extension request with the reason for the extension via IQSMS (comment field "corrective action"). Failure to submit a timely request to the Lead Auditor will result in the finding to become overdue.

Note: For authority audits, the finding due date cannot be extended without a formal FOCA approval.

5.5.6.2 Procedure

The assigned auditee shall enter the following information directly into the IQSMS:

- Reason of delay Explanation/reason for the overdue situation;
- Proposed deferred due date
- Immediate mitigation taken to avoid or limit the impact on safety caused by the delay (if applicable).

If request of the extension is approved, the Lead Auditor confirms the extension by adjusting the due date in IQSMS accordingly.

Type of Audit	First Extension	Second Extension	Further Extensions
Internal	The lead auditor himself may provide a initial extension of up to 30 days. ¹	The CMM may provide a second extension of up to 30 days (or longer, if deemed appropriate due to the circumstances and under due consideration of safety risk aspects).	The finding gets escalated to the Accountable Manager, who decides on the terms and/or actions to be taken.
Subcontractor/ Supplier performed by OSQ, TMM, OSY or by OGA / OG-auditors	TMM / OGA / OSY may provide an extension of time for their resolution of up to 30 days (or longer, if deemed appropriate due to the circumstances and under due consideration of safety risk aspects). ¹	Same as the first extension, but with the Compliance Monitoring Manager being involved.	The CMM, the NP and the ACM are fully involved, and decisions shall be taken due to the circumstances and under due consideration of safety risk aspects (e.g. because of closed stations due to the pandemic, volatile network, etc.).

Findings Extension Table

¹ First extension: If it is foreseeable that the finding cannot be closed within the first extension up to 30 days (e.g. because of necessary changes/upgrades to aircraft systems that need approval, maintenance action, etc.), in this case, the Lead Auditor can, after thorough consideration of the reasons given by the auditee, extend the finding closure period to a date, where it is realistically foreseeable that the finding can be closed.

5.5.7 Escalation of Audit Findings

5.5.7.1 Disagreement between Auditee and Auditor

Should the auditee and the auditor not agree about a raised finding, the decision making procedure can be escalated by the following chain of escalation:

1. re-evaluation of the finding by a second auditor
2. Compliance Monitoring Manager (CMM)
3. Accountable Manager (ACM): final decision.

5.6 Classification of Findings

Level	Definition	Action	Due Dates	Risk Assessment
1	<p>A level 1 finding is any significant non-compliance with:</p> <ul style="list-style-type: none"> • A legal requirement (i.e. EASA, FOCA) • A valid internal procedure or an industry standard <p>Such findings lower the safety standard or the security level and seriously hazard flight safety.</p>	<ul style="list-style-type: none"> • RCA, CAP and corrective actions are mandatory. • Opening a level 1 finding requires a subsequent notification of the Accountable Manager and the Compliance Monitoring Manager. • The activity to which the level 1 finding was raised must be stopped immediately. • The level 1 finding shall be closed in coordination with the Compliance Monitoring Manager and the Safety Manager. 	<ul style="list-style-type: none"> • The finding shall be rectified within 5 days. • RCA and CAP shall be available within 5 days. 	<ul style="list-style-type: none"> • Mandatory • The risk assessment of findings is based on the OMM Severity table and OMM Probability (Likelihood) table.
2	A level 2 finding is a non-compliance with:	<ul style="list-style-type: none"> • RCA, CAP and corrective actions are mandatory. 	<ul style="list-style-type: none"> • The finding shall be rectified within 90 days. 	<ul style="list-style-type: none"> • Mandatory • The risk assessment of findings is

	<ul style="list-style-type: none"> • A legal requirement (i.e. EASA, FOCA) • A valid internal procedure or an industry standard <p>Such findings could lower the safety standard or the security level and possibly hazard flight safety.¹</p>		<ul style="list-style-type: none"> • RCA and CAP shall be available within 30 days. 	based on the OMM Severity table and OMM Probability (Likelihood) table .
Observation	<p>An observation is a remark, information or recommendation.²</p>	<p>An observation can either be accepted or acknowledged.</p> <ul style="list-style-type: none"> • By accepting the observation, a CAP is requested. • By acknowledging the observation, the auditee recognises the suggestion for improvement and decides whether actions are taken or not. Such actions are not tracked via IQSMS. <p>Note:</p> <ol style="list-style-type: none"> 1. The reason for acknowledging has to be entered. 2. A RCA can be requested by the auditor if necessary. 	<p>If the observation is accepted, a due date shall be agreed upon.</p>	Not safety-relevant

¹ Quality and commercial items which are in non-conformance with the related contract or any other Edelweiss procedure/standard, which do not affect the safety and security standards, shall be declared as a level 2 finding.

² Observations do contain additional and supporting information in the sense of continuous improvement. They can be entered in IQSMS in the “auditor comment” field and shall be summarised in the management review by the lead auditor.

5.6.1 IOSA Classification of Findings

Level	Definition	Action	Due Dates	Risk Assessment
2	A level 2 finding is a non-conformity with an IOSA standard.	<ul style="list-style-type: none"> RCA, CAP and corrective actions are mandatory. 	<ul style="list-style-type: none"> RCA and CAP shall be available within 30 days. The finding shall be rectified within 90 days. 	Within 60 days
Observation	An observation is a non-conformity with an IOSA recommended practice.	<ul style="list-style-type: none"> A RCA is mandatory. A CAP is not mandatory if the observation is not documented/implemented (acknowledged by the auditee). 	<ul style="list-style-type: none"> The RCA shall be available within 30 days. If a corrective action is applicable, the observation shall be rectified within 90 days. 	Not required

6 Security Management System

6.1 Introduction to Security Management System

The Security Management System (SeMS) is an integral part of the Edelweiss Safety Management System.

The SeMS ensures that security operations consistently fulfil all requirements mandated in the National Civil Aviation Security Programme (NASP) as well as all LHG and Edelweiss internal security requirements. Thereby it considers the operational environment of Edelweiss.

The security processes of the the SeMS are outlined in the Edelweiss Air Carrier Security Program (ACSP).

6.2 Strategic Aviation Security

The Edelweiss security department maintains the AVSEC link to FOCA in Switzerland as well as to all CAAs of the countries on our network, ensuring full compliance with the respective regulations. It is also in constant exchange with the Swiss Federal Office of Police (Fedpol) and the relevant authorities in the USA (TSA, CBP, DHS).

Further relationships exist to A4E, IATA (IOSA), security departments of other airlines and to various security-related associations/organisations.

The Edelweiss security department performs a constant risk assessment of Edelweiss' operation and implements additional security measures in the areas of flight operation, aircraft handling and protection, passenger & baggage, cargo & mail, catering & cleaning and the choice of crew layover hotels, if deemed necessary.

The Edelweiss security department is part of the Edelweiss Crisis and Emergency Response Organisation.

High quality standards are achieved by quality control measures such as audits, tests, inspections and surveys as well as a training program covering the various security-related functions.

The Edelweiss security department, together with the SWISS and Lufthansa security departments, provides support on security matters 24 hours 7 days a week.

6.3 Core Documentation of the Security Management System

All aviation security (AVSEC) related requirements are documented in the Edelweiss Air Carrier Security Program (ACSP) which is based on the National Civil Aviation Security Programme (NASP) issued by FOCA. Its contents are reflected in both, operational and non-operational manuals, as well as in procedures not requiring approval.

The ACSP is approved by FOCA following each revision.

The ACSP is a confidential document that will be disclosed to third countries (NAA) upon request only.

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7 Management Principles

7.1 Strategic and Business Planning

7.1.1 Strategic Planning

Strategic Planning is a revolving process aimed at setting the long-term orientation of Edelweiss in a fast-changing business environment. The basis is formed by the Edelweiss strategy ([OMM Our Strategy](#)). The time horizon for strategy planning is five years.

A strategy workshop once a year with the members of the Management Board and certain upper management, depending on individual topics, puts emphasis on covering and discussing selected major business issues. Thorough preparation, under the leadership of Corporate Development, ensures that no relevant topic and no relevant input from any department are missed. The strategy workshop serves to redefine, prioritise and confirm the strategic issues for the entire company, develop a common understanding of all relevant issues and set important qualitative and quantitative targets.

7.1.2 Business Planning

Business planning is used to translate the results of the strategy workshop into short- and medium-term financial and operational goals. These measures shall directly be put into the budget, which creates an integral link between the strategy and the budget for the coming year. All operational departments analyse and prepare the demand of required human and financial resources according the derived operations plan. This process is initiated, guided and monitored by the Controlling department and overall triggered by the LH Group planning timeline.

7.2 Operational Management Process

This process regulates the procedure for the individual areas of responsibility for:

- Periodical data compilation and evaluation (management evaluation)
- Devising and prioritizing actions
- Monitoring the implementation of actions and their effects.

Objectives of the operational management process:

- Adequately implement and apply the guidelines and parameters stipulated by Edelweiss within the operations division
- Monitor achievement of the objective and, in cases of deviation or trends away from it, to initiate appropriate action and monitor its implementation and effect.

These activities shall ensure that the organisational and workflow processes are constantly developed and enhanced.

Operational Planning

Operational planning shall contain planning processes for operations which:

- define desired operational safety and security outcomes
- address operational resource allocation requirements
- take into account requirements originating from applicable external sources, including regulatory authorities and original equipment manufacturers.

The operational planning processes ensure that sufficient resources are in place to meet internal operational safety and security requirements, as well as to meet requirements from external sources, such as regulatory authorities and equipment manufacturers. Resource requirements may be determined through risk assessment, management review or other management processes.

7.3 Management Evaluation (ME)

Management Evaluation is an analysis of the performance of Edelweiss's organisation and management, including ATO and Part-CAMO, regarding its ability to meet standards given and required by the organisation, authorities or industrial standards (e.g. IOSA, LH-Group). The review shall also include the performance of contracted/outsourced activities.

It is a thorough review of the Safety, Security and Compliance Monitoring System, including the Safety and Security Policy. The analysis is performed and presented during the Management Evaluation meeting every quarter (4 times per year).

The process for ME/SRB is documented in [PM 103 OS Management Evaluation/SRB](#). Intended participants are listed on DOC 27.

The following managers analyse their respective areas of responsibility based on available sources: TE, PC, OS, OSQ, OSF, OP, OC, OT, OG and OSY.

Guideline for the ME presentations:

1. Presentation of SPI/SPT. Kinds of presentations are e.g. long landing, short landing etc. What is the interpretation of the presented figures? What is the relationship to operational safety and security? Have any possible actions already been taken?
2. Presentation of any possible non-scalable safety and security issues. This could be:
 - a. Identified department hazards, threats and risks (e.g. MoC)
 - b. Safety-relevant reports from the department (focus on direct operational safety)
 - c. Audit/inspection findings/investigations/operational feedback
 - d. Occurrences/incidents/law violations
 - e. Changes to the laws and regulations
 - f. Status of preventive/corrective measures
 - g. Follow-up of former management evaluations

Presentations containing general information, such as the status of non-safety-related projects, shall be avoided as the focus lies on operational safety. The safety policy is implemented by discussing safety objectives, key performance indicators and corresponding targets or limits.

The presentation shall indicate if past corrective and preventive actions and mitigation measures were effective or if more are required in the future, considering associated risks.

A Risk Assessment/MoC (for ME) may be performed or initiated during the SRB meeting for potential complex risks.

Upon achieving defined safety and compliance management targets from the last ME, corrective actions will be established based on these presentations.

7.4 Continuous Improvement of Safety & Security

Edelweiss strives for continuous improvement of the safety & security performance of the whole organisation.

Continuous improvement is a formal process to:

- setting up performance indicators and reviewing them regularly
- regular analysis of malfunctions and undesirable operational results
- follow-up of corrective actions and their effectiveness in improving operational performance.

The performance of this continuous improvement policy is periodically reviewed by Management Evaluation/SRB.

7.5 Leadership Principles

The company's leadership principles are defined as follows:

- Lead by setting clearly defined goals (Leapsome) based on the performance indicators defined in the job description.
- Evaluate the performance of each employee based on defined goals and performance indicators.
- Delegate and assign clearly defined responsibilities and competencies.
- Promote entrepreneurship and innovative practice, yielding rising entrepreneurial risk.
- Make decisions and be quick and consequent to enforce them.
- Communicate openly and honestly - even concerning delicate matters.
- Be credible and live by what you say.

- Stand by the Edelweiss Code of Business Conduct (COSMOS → Work → Konzernrichtlinien → Code of Business Conduct Edelweiss Air AG) as well as by all regulations and processes in our operating field.

7.6 Meeting Policy

7.6.1 Goals

The meeting leader and the meeting participants shall strive for effective meetings with replicable results.

To support this goal, basic directives are established.

At least half yearly or whenever significant changes, new processes, personnel changes, organisational adaptations, changes in scope and scale of meeting or any additional need arises, a hazard identification agenda point shall be added to ensure proactive hazard awareness. Hazard shall be reported in accordance with [PM 115 OS Hazard Identification](#) and tracked in IQSMS.

7.6.2 Application of Meeting Directives

Listed meetings

- These directives describe how the listed meetings (refer [OMM List of Regular Meetings](#)) shall be prepared and documented.

Not listed meetings (ad-hoc meetings)

- The directives shall serve as a recommendation.

Informal meetings

- It is recommended to document the meeting's results, taken decisions, and assigned tasks

7.6.3 Meeting Directives

Meeting agenda

- All listed and not listed meetings shall have a predefined agenda. Listed meetings follow a standard agenda.
- The agenda shall be made available before the meeting allowing an appropriate preparation for all participants.

Meeting invitations

All meetings must be planned for both on site and online participation (hybrid meeting format). A meeting room shall always be blocked for the expected on-site participants only.

Exception

- If the meeting only takes place online, no meeting room must be blocked.

The meeting responsible can request an on-site only meeting in certain cases, however, a O365 Teams invitation shall be included, nevertheless.

Duration of Meetings

Meetings shall be planned - whenever possible - in 45-minutes slots. The spare 15 minutes of the hour will allow for an on-time transfer from one meeting to another.

In case a meeting should last for more than 45 minutes it should be scheduled in a way that allows for a 15-minutes transfer to the next appointment for most of the participants. Long meetings shall include appropriate breaks.

Keeping Minutes

- The minutes shall be taken in templates located on COSMOS under "Arbeitsdokumente" (Safety Assurance → Documents → OSQ Compliance Monitoring → PUBLIC_RO → 2) Interne kontrollierte Dokumente_DOC → _Interne Kontrollierte Dokumente_Verwendete DOCs)
- Generally, the minutes shall be kept in OneNote, however, if access for all participants to OneNote is not possible, Word shall be the alternative.
- Assigned tasks shall be kept and tracked with O365 planner.

The meeting language is - where not required otherwise - German.

Follow the meeting process described in the meeting templates under the section "Meeting Rules".

Storage of Meeting Minutes

The minutes must be stored on the SharePoint site of Teams, preferably in pdf format, for the respective meeting. If no such Teams exist, the minutes must be stored in the ORG-Teams of the respective meeting responsible.

- In case of storage on the ORG-Teams, the meeting minutes folder shall be shared with the necessary participants and/or sent via email to external guests, if direct access cannot be granted.

7.7 Communication

7.7.1 Internal Communication

Edelweiss maintains an open communication culture which is built on mutual honest and respectful interaction. Every employee, including management, has an open ear for the concerns of the employees. Especially issues concerning safety, security, and compliance monitoring are freely and in line with the established just culture able to be discussed. Communication at Edelweiss happens at different levels with various mediums. The following outlines the most commonly used and institutionalised methods of communication.

All employees at Edelweiss are able to communicate in English and per default in German (Common languages). Communication with the media or press is coordinated by Corporate Communications only.

A detailed list of all additional operational instructions and information, the responsible department and means of publication is to be found in [OM A System of Promulgation of Additional Operational Instructions and Information](#).

7.7.2 External Communication

The nominated person or assigned managers are responsible to communicate with regulatory authorities, original equipment manufacturers and other operationally relevant external entities.

It is the responsibility of the internal contact to forward necessary information to other departments concerned without delay. Likewise, it is their duty to appropriately forward any external requests.

7.8 Project Management

Corporate Development (ED) is responsible for the project management methodology. Edelweiss has a standardised project management process which has been approved by the management board. Projects are divided into the phases "generating and evaluating ideas", "deciding on implementation", "implementation" and "conclusion and review of achieved goals".

The main goal of Edelweiss project management is to support project managers with a project management process that covers the essential and mandatory subjects that need to be considered for successful project execution with minimal administrative overhead. This ensures an integrated approach considering safety, risks, documentation and compliance.

For the project management process, refer to [Cosmos → Work → Projektmanagement](#).

7.9 Personnel Policy

Edelweiss does its best to provide an outstanding workplace environment to support the personal and career development of its employees.

Success and above average effort are recognised and rewarded.

Our management and executive board undertake everything, so our employees have the best qualifications to guarantee reliable, friendly, punctual flight operations to the best price-service-ratio. Shortcomings, especially in safety, are rectified transparently and with the upmost priority.

Edelweiss is ensuring that all employees requiring specific qualifications or training to perform their task - especially in respect to safety and security of aircraft operations - maintain their competence based on continued education and training in order to satisfy any mandatory competency requirements.

For detailed human resources processes refer to [PM EH Processes](#).

7.9.1 Personnel Selection

Edelweiss is aware, that their employees are their most valuable asset. For this reason they are chosen carefully. Candidates must go through a selection process defined by the nature of the position in question. The following qualifications are assessed:

- education / Training
- experience and skills
- personal/social characteristics/competence
- motivation
- aptitude for the position and the potential to adapt to the company culture.

7.9.2 Management Development

The annual Edelweiss employee appraisal (MAG / Leapsome) is an active and systematic exchange between employee and supervisor at all levels of the organisation. The individual well-being of the employee as well as his or her assessment of goals and performance should be addressed.

The appraisal talk strengthens the role and function of the supervisor and creates transparency about the quality of staff and management, thus providing a solid basis for targeted investment in our current and future employees and managers.

For further details refer to COSMOS → Work → Personalentwicklung.

8 Reporting Scheme

8.1 Objective of Reporting Scheme

Safety management systems involve the reactive and proactive identification of safety hazards. Accident investigations reveal a great deal about safety hazards. Fortunately, aviation accidents are rare events. They are, however, generally investigated more thoroughly than incidents. Research showed that the number of incidents is significantly higher than the number of accidents for comparable types of occurrences (1:600 Rule). The causal and contributory factors associated with incidents may also culminate in accidents. Often, only good fortune prevents an incident from becoming an accident. Unfortunately, these incidents are not always known to those responsible for reducing or eliminating the associated risks. This may be due to the unavailability of reporting systems, or people not being sufficiently motivated to report incidents. One of the most important methods of data acquisition is a company wide reporting system.

Effective reporting is based on the author not just reporting the outcomes but also about the circumstances that led to the situation the author is reporting about. Beside safety and security perspective reporting is the basis of the learning organisation Edelweiss. It is used by management to improve the system and serves the employees for their personal learning process. Operational feedback refers to safety and security information.

For this, Edelweiss uses a comprehensive, electronic reporting tool called "IQSMS" (from ASQS) for all employees working on behalf of Edelweiss and contractual parties (e.g.: ground handling services, maintenance service providers, etc.). Reports are generated through the own IQSMS Reporting App (installed on a portable device), or via any internet browser.

Each report can be written in a confidential or anonymous way if deemed necessary.

Safety relevant outcomes of the reporting system are analysed, classified, archived and will trigger mitigation or Management of Change processes if necessary.

All Edelweiss employees, as well as external contracted partners, have to participate in this system by reporting all events, they find notable in decreasing the level of acceptable Safety or Security.

8.2 Just Culture in the Reporting System

It may happen that the analysis of a safety report (occurrence report) shows wrong acting or mistakes of the reporter. It shall be pointed out, that the fundamental idea of safety reporting is avoiding re-occurrence and preventing accidents, not putting blame on persons. It is not the idea to put blame on any reporter.

Assuming that no employee of Edelweiss provokes mistakes intentionally, Edelweiss abstains from claims for damages and/or prosecution. In relation with the company's Just Culture Policy ([OMM Just Culture Policy](#)) the precondition is, that the mistake or non-

compliance was not done grossly negligent and/or intentionally and that the mistake was reported to give chance for improvement.

The following cross reference table indicates the different requirements to our reporting and feedback system.

Policy to ensure effective safety reporting, including actions	OM A Non-Punitive Safety Reporting System
Feedback process which notifies contributors about results	PM 114 OS Processing of Occurrence Reports
Simple and accessible reactive and proactive reporting system	OMM Objective of Reporting Scheme OMM Communication
Policy in place providing immunity from disciplinary action for employees reporting safety deficiency, hazards or occurrence	OM A Non-Punitive Safety Reporting System OMM Just Culture Policy
Feedback process which notifies contributors about results	PM 114 OS Processing of Occurrence Reports
Specific reporting process to address crew fatigue observations and incidents related to crew alertness	PM 110 OS Fatigue Risk Management Fatigue Report (IQSMS)

8.3 Different Types of Safety Reports

Following type of safety reports exist in the IQSMS Reporting tool:

- Flight Crew Report (FCR)
- Cabin Crew Report (CCR)
- Confidential Human Factor Report (CHFR)
- Ground Operations Report
- Maintenance Report
- Fatigue Risk Management Report
- Hazard Identification Report
- Security Report

What kind of Report do you want to enter?	
Cabin Crew	Cabin Crew
FDM Internal	FDM Internal
Flight Crew	Flight Crew
Ground Operations	Ground Operations
Hazard Identification	Hazard Identification
Maintenance	Maintenance
Office	Office
Others	Others
Survey	Survey

The reporters (writer) have to note and pro-actively report, all details which they judge as unusual or noteworthy about any occurrence, including potential hazards which could jeopardise operations in future.

Crew reports, revealing a non-compliance towards defined procedures may be looked at as an inspection of a contractor or subcontractor. The reporter selects the suitable type of report within the IQSMS Reporting App. The preselected reports will be sent to the predefined distribution group. The automatically addressed responsible will take corrective and preventive or mitigation measures up to closing the report.

8.3.1 Handling of Safety and Security Reports (Processing of Reports)

The IQSMS Reporting Module is a web-based tool designed to handle, classify and analyse risk from all divisions within Edelweiss. The reporter selects the suitable type of report within the IQSMS Reporting App. The preselected reports will be sent to the predefined distribution group. The automatically addressed responsible persons will take corrective and preventive actions or mitigation measures up to closing the report.

Incoming safety reports are automatically collected and registered in the IQSMS database. Depending on whether the received report is open or confidential, the system requires by default all data accordingly.

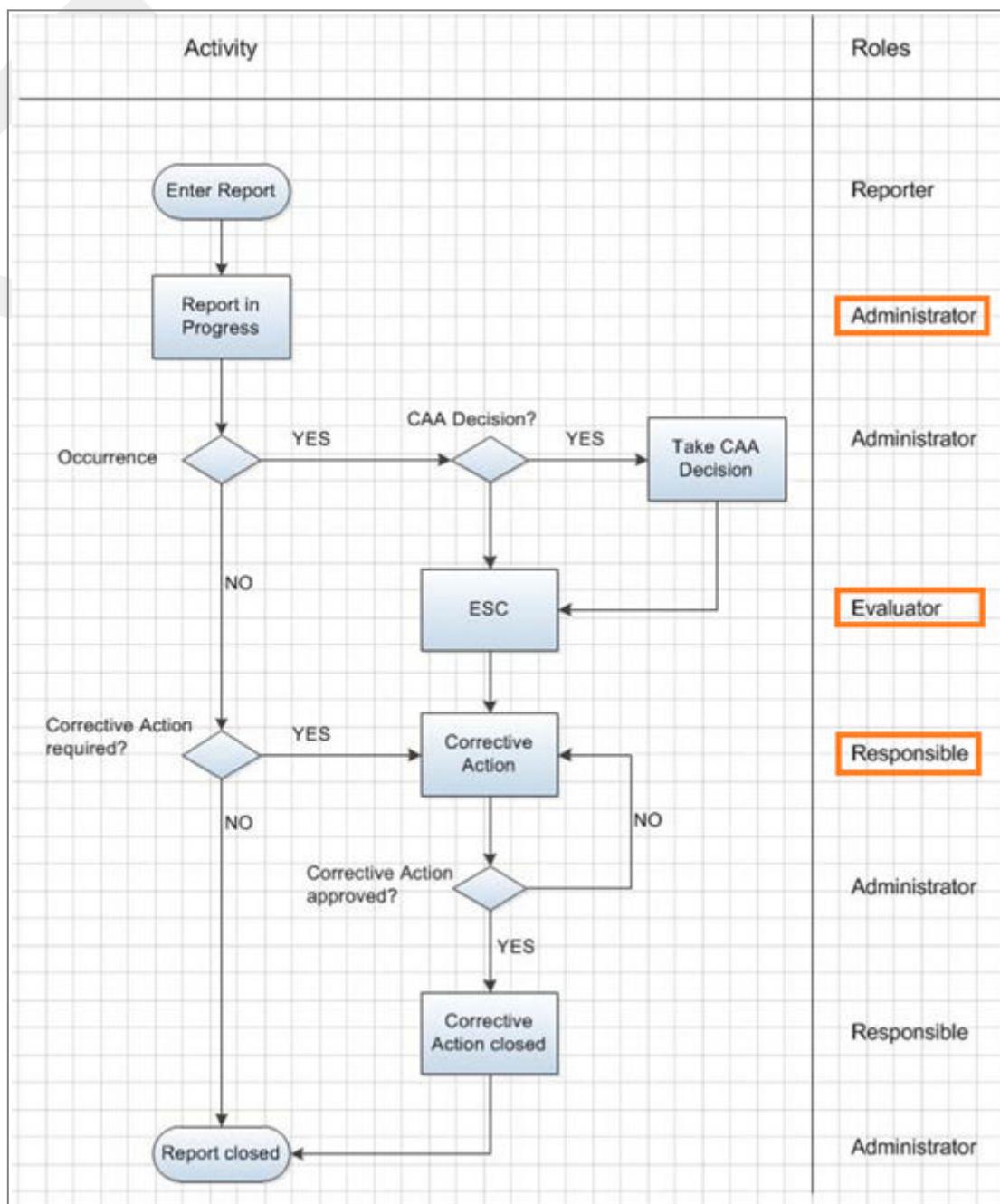
The following information will be entered into the database as a minimum:

- Headline/title describing the event
- Registration
- Date of event
- Time of event
- Flight number
- Locality (aerodrome/airspace)
- Flight phase
- Flight Crew Member (is left open in case of CHFR)
- Specific data referring to the situation (if provided by the reporting person)
- Information describing the event

The IQSMS generates a unique file number beginning with the prefix "#".

The writer of the report will automatically receive an acknowledgement of the receipt including the specific occurrence ID.

As seen in the following process, there are different key roles in the reporting system: Administrator, Responsible and Evaluator.



The Administrator will get the report to answer. If he is unable to do this on his own, he will request an answer from one of the Responsible persons, which are pre-nominated by

the IQSMS System or may be nominated by the Administrator. After an answer is given either by the Responsible person or the Administrator itself, the system pre-selects if a safety impact is to be expected, according to the report's header. If this is not the case, the report is closed, the reporter receives the response and the report is transferred into the database for storage. If there might be a safety impact, the report is routed to the Evaluator who decides the level of risk. After the risk classification, the report is set to "closed" which releases the response to the reporter, a copy to the database and information about the risk level.

If the given responses from the Responsible person(s) are unsatisfactory and do not address the problem, the report shall remain open and the safety department (OS) has to be informed for continuing review and action as required.

The Administrator's duties are:

- Approving and processing the reports within 72h.
- Assigning the report to Responsible(s).
- Verifying the answers, statements and proposed corrective actions by the Responsible person(s) for plausibility and prevention of re-occurrence.
- Ensuring mandatory occurrence reports (MOR) are filed correctly (e.g.: correct entity selected (AOC, ATO Part-CAMO), all mandatory fields are correctly filled with correct terms, etc.).
- Ensuring the event is risk classified correctly.
- Ensuring MOR are sent to authority within 72h.
- Ensuring voluntary occurrence reports with a potential impact on safety are sent to the authority and submitted to the aerodrome involved when relevant.
- Performing the root cause analysis.
- Entering corrective actions.
- Closing, reopening and editing reports.

The Responsible person's duties are:

- Entering preventive/corrective actions, including the final corrective action for those reports assigned to him by the Administrator Reporting Module.

The Evaluator's duties are:

- Performing ADREP classification and risk assessment for those reports assigned to him by the System Admin under Allocation of Reports.

Once a safety report is closed, the contents may be published in Safety Letters and/or Bulletins if the Safety Manager deems it to be supportive in the interest of safety promotion.

For example: Safety-related issues concerning a specific aerodrome, reported by crew are collected and published by OSF in the CCI under the column "FLIGHT SAFETY / SHARED EXPERIENCE".

Closed reports are selected for a random check during an audit as a standard audit question. The auditor will check if preventive or corrective measures have been implemented as described.

8.3.1.1 Administrator for the Reporting System within Edelweiss

An Administrator is a legally required person inside the company to handle independently the collection, evaluation, processing, analysis and storage of details of occurrences reported.

A list of active Administrators is listed in the IQSMS and maintained by department OS.

8.3.2 Hazard Reporting

With the IQSMS Reporting Module there is a possibility to select under "Type of Report" the "Hazard Identification" form. This type of report shall only be used for situations with the potential to create a safety or security issue in the future. Hazard reports will be assessed by the safety department and forwarded to the responsible department for further risk evaluation and corrective action. Hazard reports are not confidential reports.

8.3.3 Mandatory Occurrence Reporting (MOR)

All occurrences which may represent a significant risk to aviation safety are mandatory occurrence reports (MOR) and must be reported to the European Co-ordination Center for Accident and Incident Reporting Systems (ECCAIRS) via the state (FOCA).

The European Commission has published a list for occurrences related to the operation of the aircraft (Commission Implementing Regulation (EU) 2015/1018). This list is structured in such a way that occurrences are linked with categories of activities during which they are normally observed, according to experience, in order to facilitate the reporting of those occurrences. However, this presentation must not be understood as meaning that occurrences must not be reported in case they take place outside the category of activities to which they are linked in the list. The items (MORs) from this list applicable to Edelweiss operation - considering the AOC, the ATO and the Part-CAMO - have been implemented into IQSMS. All these MORs are marked in IQSMS with a "#" after the description.

By selecting "Report for Authority" in the IQSMS this will de-identify the persons involved in the occurrence in order to respect privacy policy.

A system is established to check the quality of the reporting system on a monthly basis.

Refer to [OM A Mandatory Occurrence Reporting](#); [PM 116 OS Mandatory Occurrence Reports](#) and [PM 114 OS Processing of Occurrence Reports](#).

8.3.4 Voluntary Occurrence Reporting (VOR)

Any occurrence that has or might have endangered the aircraft or its occupants or any person on ground is considered reportable. Instances of a specific type of occurrence, which in isolation would not be considered reportable, but which could form a potential hazard when occurring repetitively must be reported as well! Such voluntary reporting is treated under the same just culture principle and afforded the same protection of the sources of information.

Any Voluntary Occurrence Report classified as an ESC-value \geq "c-d" shall be treated as a mandatory occurrence report and sent to the authority as described in [OMM Mandatory Occurrence Reporting \(MOR\)](#).

8.3.5 Confidential and Anonymous Reporting

There is a difference between confidential reporting and anonymous reporting. An anonymous report is a confidential report without stating the name of the reporter.

Confidential reporting is the preferred system by Edelweiss because it permits feedback to the reporter in response to the report. Not only is the reporter entitled to an explanation, but also feedback provides an excellent incentive for the submission of future reports. The effectiveness of a confidential human factors reporting system is determined by a basic requirement for safeguarding safety and risk information.

Individuals will continue to provide information only when there is confidence that such information will be used only for safety purposes and will never be compromised or used against them

Incoming confidential reports (Human Factor) are processed in the IQSMS but can only be seen (read) by the Safety Manager and his deputy (see also [PM 102 OS Processing of CHFR](#)).

For the Confidential Human Factor Report, refer to [OM A Confidential Human Factor Report \(CHFR\)](#).

9 Emergency Response Plan

9.1 Objectives and Scope

Edelweiss is part of the Lufthansa Group Crisis and Emergency Response Organisation.

The entire coordination of emergency response planning is laid out in the [Crisis Emergency Response Manual \(CERM\)](#).

The CERM documents and defines the policy, organisation, responsibilities, tasks, functions and procedures of the Lufthansa Group emergency response organisation and the Edelweiss corporate emergency response plan.

The CERM is primarily applicable for incidents involving Edelweiss aircraft, the most critical occurrence and of greatest consequences to an airline and its passengers.

However, it is also applicable for any operational event resulting in fatalities, serious injuries and/or considerable damage that involves Edelweiss.

It is the responsibility of the Emergency Response Planner to guarantee the availability of trained managerial staff at all times. This includes the control and supervision of the knowledge transfer within all involved business units of Edelweiss, especially with regard to personnel changes. Furthermore, designated managers with an assigned leading function in the Corporate Emergency Response Process must familiarise themselves with the content of the CERM. Each function holder is responsible to develop, maintain, communicate and exercise sub-processes throughout the year and to keep the corresponding documentation updated at all times.

The Emergency Response Planner/Process Manager is responsible for coordinating and harmonising internal and external processes, which are tested regularly by means of an exercise. The outcome of these exercises or of any response to an actual event (which means whenever the ERP is executed) will be evaluated in IQSMS and the necessary steps will be undertaken to adapt the actual plan if necessary and to update the processes involved.

The Emergency Response Planner/Process Manager is also responsible for keeping the alarm system in permanent working order and the alarm plan database updated. Furthermore, he is in charge of the updating process of the CERM and any other related documentation needed in relation with the corporate emergency response plan (refer to mission statement ERP Manager in the CERM appendix). In addition to all the mentioned parts of the ERP, the individual Station Emergency Response Plan (SERP) and the training involved are also under the responsibility of the Emergency Response Planner. This includes all the necessary documentation, the SERP and the coordination with the overall Corporate ERP.

The emergency response organisation must be operational within 60 minutes following notification on a 24-hour/ 365-day basis. In an initial phase, crisis management duties will be active 24 hours a day. It is therefore vital that all function holders can rely on an

adequate number of trained deputies in order to guarantee a 24-hour coverage as well as absence relief. The number of available persons per faculty is periodically checked in connection with the Fact24 phone alarm. Contact possibilities for the public must be made available worldwide by extending office hours of call centres and of offices in town and at the airport as appropriate.

9.2 Concept

In times of crisis, strong, unconditional and professional leadership as well as caring and compassionate communication may be decisive factors to recover well and to emerge with credibility and respect.

The focus of our attention must therefore always be on:

- utmost control and overview of overall activities;
- care for passengers and families of passengers concerned;
- care for crews and families of crew members concerned;
- timely information and communication to next-of-kin, media, public, own staff;
- care and support for directly and indirectly involved own staff;
- accident and incident investigation;
- business continuity according to established values.

For further details refer to [LH Group CERM EDW Version](#).

10 Management System Training

10.1 Management System Basic Training

The Safety Manager is responsible for Edelweiss personnel receiving appropriate Management System Training according to this training concept.

The Management System Training and the trainees are described in [OM D Management System Training](#). The detailed Management System Training syllabus is outlined in the controlled document DOC 49.

Every employee joining Edelweiss is considered safety-relevant personnel. All safety-relevant personnel receive Management System Training. Management System Training is split between a classroom introduction during the Edelweiss welcome day and subsequent web-based training (WBT). The training contains the necessary information about Edelweiss' management system and policies.

Management System Basic Training is defined as initial training (MSBT) and continuous training (MSCT).

Cross references to OM D:

Crews, FOO and Instructors	Description of Management System Training	OM D Management System Training
Flight Crew	Operator's Conversion Course	OM D Operator's Conversion Course
Cabin Crew	Basic Course	OM D Elements during initial training course and examination
Cabin Crew	Operators Conversion Course	OM D Aircraft type specific and operator conversion course
Operations Personnel (incl. crews)	General	OM D General & OM D Management System Training
FOO	Initial Training	OM D Initial Training FOO
Training and Checking Personnel	Management System Training	OM D Management System Training

10.2 Management System Advanced Training

This training program is based on the basic training program and is required for aviation safety specialists (see [OM D Management System Training](#)). The Management System Basic Training is a prerequisite for this training. It must be held in a classroom by competent personnel (e.g. Accountable Manager, CMM, Safety Manager, etc.).

The detailed Management System Training syllabus is outlined in the controlled document DOC 49. Management System Advanced Training is recorded on DOC 38 for Auditors and DOC 39 for Managers.

Management System Advanced Training is defined as initial training and continuous training (MSCT).

Cross references to OM D:

Management Personnel, Auditors and Inspectors	Description of Advanced Management System Train- ing	OM D Advanced Training - Man- agement Personnel, Auditors and Inspectors
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10.3 Management System Continuous Training

The purpose of the Management System Continuous Training (MSCT) is to ensure that the organisation and all employees are continuously maintaining and improving the Standard of Performance regarding all aspects, philosophies, policies and procedures of the management system. It is reviewed periodically for its effectiveness in order to ensure continuing relevance to the organisation and based on a systematic analysis of factual data and results of:

- Internal audits;
- Edelweiss' monitoring system;
- Question of the day;
- Crew reports;
- Studies, Investigations, Surveys and Reviews including Management Evaluation;
- Yearly employee interviews;
- Flight Data Monitoring;
- Reporting and Feedback System.

This information again gets evaluated and incorporated into the next training programs. Management System Continuous Training is customised for the following target groups:

- aviation safety specialists, or
- other safety relevant personnel.

Maintenance System Continuous Training is performed as needed, at intervals not exceeding 3 years. It may be part of any other training (e.g. RGC).

Management System Continuous Training for safety relevant personnel may be performed through self-study (web-based training, specific publication).

Cross references to OM D:

Crews, FOO and Instructors	Description of Continuous Management System Training	OM D Continuous Training
Flight Crew	Recurrent Training and Checking	OM D Recurrent Training and Checking
Cabin Crew	Recurrent Training	OM D Course overview
Operations Personnel (incl. crews)	Continuous Training	OM D Continuous Training
FOO	Recurrent Training	OM D Recurrent Training FOO
Training and Checking Personnel	Management System Training	OM D Management System Training

11 Record Keeping and Archiving

11.1 General

Following requirements are valid for any storage of Edelweiss documents, data, records or logs (AOC, ATO, Part-CAMO, Subcontractors, etc.).

Edelweiss record keeping and archiving must ensure that:

- all records are readily accessible, legible, identifiable, and available to eligible personnel only
- safeguarded against theft, unauthorised access, damage, alteration (protected and secured)
- all records are kept in paper form or in electronic format or a combination of both
- all electronic format records are accessible within the Edelweiss IT-System
- a backup system for electronic data is available (backup within 24hrs)
- all paper format records are accessible within Edelweiss facilities and are stored within the applicable department
- records are archived for the retention period defined
- the retention period starts when the record has been created or was last amended
- after the end of the storage period, documents/records may be disposed
- confidential documents have to be destroyed by paper shredder or permanently deleted (EDP).

11.2 Management System Records

Accurate, complete, and readily accessible records documenting the results of the Compliance Monitoring Program and Management System have to be retained by Edelweiss for at least 5 years in paper or electronic form:

- IQSMS Audit and inspection plan
- IQSMS Audit/Inspection checklists
- IQSMS Audit/Inspection reports
- IQSMS responses to findings (corrective action, root causes,...)
- Management evaluation reports
- List of OSF / OSQ training and recurrent training
- CERM (ERP) records
- Investigation Report
- Risk Assessments (MoCs)
- IQSMS Reports (MORs, VORs and CHFRs)
- Safety studies, surveys, reviews
- Training records (incl. Management System Training)
- Meeting protocols (e.g. SRB, SAG, FSAG, GL, Accountable Manager meeting)
- Quarterly Reports (management report to O / board).

They are at all times available to the following managers:

- Accountable Manager
- Compliance Monitoring Manager
- Safety / Security Manager
- The owner of the individual document (OC/OT/etc.).

These records are stored by the CMM, Safety/Security Manager or Owner and are treated confidentially.

11.3 Document Storage Periods

Operations Manuals (OM) shall be retained for at least for 5 years.

11.4 Flight Records "preparation and execution of flight" (OC/OG)

Refer to [OM A Control, analysis and storage of records, flight documents and additional data](#)

11.5 Security Records (OSY)

Refer to ACSP 0.10.2 Document Retention.

11.6 Ground Operations Records (OG)

For ground operations, refer to [GOM Retention of Documents](#).

For cargo, refer to Swiss WorldCargo CHM chapter 2.

11.7 Training Records (ATO)

Refer to [OM D Documentation Storage](#).

Training records are electronically stored in MINT and are protected accordingly.

11.8 Maintenance Records (Part-CAMO)

Refer to [CAME Time & Continuing Airworthiness Records; Responsibilities, Retention, Access](#).

11.9 Electronic Data Processing (EDP)

Edelweiss has several servers in use. All servers are using a common storage device (SAN) or a cloud technology to store all the business relevant data.

A back-up server makes a daily snapshot of the image of the storage device. This image will then be backed-up either by a tape robot or in cloud storage.

The back-up process provides a daily incremental back-up, a weekly full back-up and a monthly full back-up.

11.9.1 Contractor / Subcontractor Electronic Data Processing (EDP)

Edelweiss ensures, that the back-up of contracted IT systems is performed as contractually agreed. The respective Nominated Person or Person who signed the contract is responsible and monitors the result of the performed back-up according to the defined interval.

The monitoring is ensured through internal inspections (refer to [OMM Compliance and Conformance Control](#)).

11.10 Application for a Specific Approval

Edelweiss shall retain all records relating to an application for a specific approval (SPA.GEN.105) at least for the duration of the operation requiring a specific approval.

12 Contracting and Leasing

12.1 Contracting

Contracting activities are activities by external service providers, that fall under the scope of Edelweiss' approvals. Contracted activities include all activities within Edelweiss's scope of approval that are performed by another organisation, which is either itself certified to carry out such activities or if not certified, working under the organisation's terms approval.

Edelweiss shall ensure, that the competent authority is given access to the contracted organisation, to determine continued compliance with the applicable requirements.

The ultimate responsibility for contracted products or services provided by external organisations always remains with Edelweiss. Activities performed by contractors may have an impact on safety. Therefore, the contracted safety related activities need to be addressed through the Edelweiss's safety management and compliance monitoring program.

12.1.1 Evaluation of Subcontractors and Products

When evaluating a contract with a new provider, two different kinds of contractual relations could exist:

- Subcontracted services (EASA term) = outsourced operational functions (IOSA term); or
- Products delivered by suppliers.

A clear picture about the kind of contract must exist before the evaluation process as per [OMM Evaluation Process](#) is initiated as the processes are different.

12.1.1.1 Subcontracted Services/Outsourced Functions

The term of subcontracting or outsourcing can be determined by the following characteristics:

- A business practice whereby Edelweiss transfers the conduct of a job, duty or task that is performed by the subcontractor's personnel as a part or in direct support of Edelweiss' operations
- Edelweiss remains responsible for the output or results even though it is conducted by the external party
- Apart of documentary elements, it can typically not be inspected prior to its delivery or implementation
- Examples:

- any kind of training using the external provider's infrastructure and instructors, ground handling, dispatch/ flight planning by an external provider and provided directly to flight crew, maintenance tasks by external providers
- Wet lease or code share operations are not considered to be operational function.

Usually, subcontractors used within Edelweiss are certified either based on EASA requirements or an industry standard (e.g. ISO 9001) which includes a compliance monitoring or quality system.

In such a case, Edelweiss compliance monitoring management focuses on auditing of the:

- contract to contain specific documented requirements which can be monitored to ensure requirements affecting safety or security of operations are being fulfilled
- interfaces between EDW and the subcontractor
- subcontractor's compliance monitoring or quality system.

12.1.1.2 Products

The term of "products" can be determined by the following characteristics:

- can typically be inspected by Edelweiss prior to its use, to ensure it fulfills requirements before being deployed to operations
- tailored:
 - although a product may involve configuration for Edelweiss, it is still considered to be a product
- subscription service:
 - buying of products is not necessarily related to a one-time event but might include a subscription service with regular delivery intervals
- examples:
 - any form of data (e.g. FMS or EGPWS database, navigation/obstacle data or manuals, performance charts), manuals and other documentation (route or training manuals), CBT/WBT, weather/ performance data, aircraft parts, equipment used (e.g. GSE), equipment used from other providers (e.g. dry lease of simulators rented from a simulator centre), flight planning by Edelweiss with an online platform from an external provider, DCS system/ software.

12.1.2 Evaluation Process

This chapter contains a summary of the evaluation process which is documented in detail and implemented by use of the process [PM 600 F Buying-in Third Party Products and Services](#).

- outsourced services:

- require an initial evaluation process (refer to Major steps of the Evaluation Process below)
- and a continuous monitoring as per [OMM Continuous Monitoring of Contractors](#)
- product control:
 - requires an initial evaluation process (refer to Major steps of the Evaluation Process below) only,
 - nevertheless, any kind of (continuous) monitoring as per [OMM Continuous Monitoring of Contractors](#) may be applied if deemed required (e.g. complexity of the product, experience with subscription services or any other indicators pointing towards potential issues).

Major steps of the Evaluation Process

- Contractor holds the required approvals and certificates (if applicable)
- Service providers must run a valid and fully implemented SMS (whenever possible)
- Elaboration of needs defined by specific documented requirements
- Offer which confirms or adjusts specific documented requirements and contains commercial items
- Offer confirms the right for future supervision and monitoring without any extra costs
- Decision about kind of contract being a subcontracted service or product
- Safety-relevant issues (i.e. no SMS): risk assessment or change management
- Compliance/conformance evaluation
- Final acceptance of contract (after re-negotiation if required)
- Signing of contract
- Monitoring: definition of kind (audit or inspection) and interval of monitoring

Note: Contracted maintenance is defined in the [CAME Contracted Maintenance](#). Subcontracted Training Facilities are defined in [OM D Subcontracted Training Facilities](#).

12.1.3 Continuous Monitoring of Contractors

Subcontractors are supervised by the responsible line, Compliance Monitoring Manager (CMM) or designated person who are involved in this part of the operation. During audits and inspections the specific documented requirements as stated in the contract shall also be verified. Findings from these audits and inspections shall be treated according to [OMM Audit Findings](#).

Contractors and pooled services, are assessed and monitored by Edelweiss on different levels:

- Audits (including SMS)
- Inspections
- SPI/SPT, see [OMM Safety Performance Monitoring and Measurement](#)

- Self monitoring system.

If external service providers (containing safety risk functions) have a valid SMS, Edelweiss shall have coordination and monitoring processes that ensure the management of safety in operations. The easiest (not less effective) way of checking a subcontracted service is by monitoring the daily operation (crew reports).

Pooled services (e.g. fuel pool) are treated like any other contracted service. The contracted pool informs OSQ immediately about any relevant deviation or finding. OSQ opens or delegates thereafter the respective entry into SABRE FPM (refer to [PM 124 OSQ Tracking of Findings](#)).

For external service provider which are not under direct control of Edelweiss (e.g. ATC providers, airport security, etc.) the output should be monitored in order to ascertain desired results are being achieved.

The table in Appendix Subcontractor Matrix serves as a guideline for the continuous monitoring of contractors.

12.2 Codeshare

Codeshare agreements are not subject to approval.

However, whenever Edelweiss enters into a codeshare agreement with a third-country operator (TCO) as the operating carrier, FOCA (sboc@bazl.admin.ch) shall be notified.

The notification shall be supported by information about the TCO's compliance with the relevant regulations including the ICAO Standards referred to therein.

Codeshare partners are subject to continuous monitoring according to the LH Partner Airline Monitoring Process.

Edelweiss shall enter into a codeshare agreement with a TCO only after:

- verifying the potential partner airline is listed on the current LOPP regardless of the category (CAT1, CAT2, CAT3, CAT4);
- verifying that the partner airline is listed on the IOSA registry;
- having verified that the third-country operator complies with the applicable ICAO standards; and
- having provided FOCA with documented information enabling it to
 - satisfy itself, following the verification by Edelweiss, that the TCO complies with the applicable ICAO standards;
 - liaise with the competent authority of the state of the TCO as necessary.

When a code-share agreement with a TCO is implemented, Edelweiss shall regularly assess:

- the ongoing compliance of the TCO with the applicable ICAO standards by using advantage of the LH Partner Airline Monitoring Process; and

- that the TCO is not subject to an operating ban published by the European Commission for Mobility and Transport [(EC) No.: 2111/2005 (Black List)];

to ensure, that no tickets are sold and issued on such operators.

12.2.1 Standard Elements of a Lease-In Contract

The following standard elements are mandatory topics in a lease-in contract:

- Special termination rights in the event of loss/restrictions on IOSA registration
- Regular release and clearance of the lessor's IOSA Report to Edelweiss
- Reporting of the lessor's SAFA ratio on a monthly basis
- Obligation to inform any mandatory or voluntary report to Edelweiss OS
- Audit and inspection rights for Edelweiss' OS-Department
- Obligation of the lessor to risk mitigation measures following a CARA
- Regular provision of SMS safety report to Edelweiss
- Obligation to report significant changes by the lessor and forward results from change management process
- Approval for sharing data within the LH Group regarding evaluation
- In case of a codeshare agreement, the obligation of the operating carrier to inform the marketing carrier about sub-lease, an operating ban or other (legal) restrictions in due time.

12.3 Leasing

12.3.1 Terminology

Term	Definition
Dry lease	Lease of an aircraft without any crew
Dry lease-in	The aircraft is leased in without any crew and operated under the AOC of Edelweiss
Dry lease-out	The aircraft is leased out without any crew and operated under the AOC of the foreign operator
Wet lease	Lease of an aircraft with flight crew or complete crew
Wet lease-in	The aircraft is leased in with flight crew or complete crew and operated under the AOC of another operator
Wet lease-out	The aircraft is leased out with flight crew or complete crew and operated under the AOC of Edelweiss

Term	Definition
Lessor	The party from which the aircraft is leased
Lessee	The party to which the aircraft is leased
Community Operator	An operator certificated under EASA air operations by one of the member states

12.3.2 Responsibility and Restrictions

The ACM, NP Ground Operations or Ops pickett on duty are authorized to sign ad-hoc lease-in contracts. All other lease contracts need to be signed at least by the ACM.

Except for ad-hoc wet lease-in, all wet lease-in need the approval by the Compliance Monitoring Manager (CMM).

If passengers with codeshare tickets are affected, the particular codeshare partner needs to be informed immediately.

For all wet lease-in operations, passengers have to be informed of the identity of the operating air carrier or carriers according to Commission Regulation (EC) No. 2111/2005.

12.3.3 Wet Lease-In

A wet lease-in agreement is a delegation of a flight operation from Edelweiss to a lessor, while the operational and technical control and responsibility lies with the lessor, the commercial responsibility remains with Edelweiss.

Edelweiss distinguishes between the following possibilities:

- limited wet lease-in
- wet lease-in based on a framework approval.

Except for ad-hoc wet lease-in for AOG coverage, Edelweiss generally makes use of wet lease-in based on a framework approval.

Any lease agreement concerning aircraft used by Edelweiss shall be subject to prior approval by FOCA.

For Ad-Hoc Wet Lease-In, however, the approval may be deemed to have been given, provided the process described in [OMM Ad-Hoc Wet Lease-In \(Urgent Wet Lease-In\)](#) has been followed.

Wet Lease-In Criteria table:

	Wet Lease-In based on framework ap- proval	Limited Wet Lease-In	
		Short Term Wet Lease-In	Ad hoc Wet Lease-In (Urgent Wet Lease-In)

EASA registered	---	---	Yes
IOSA Registry	Yes	Yes	Yes
LOPP¹	CAT1 or CAT2	CAT1, CAT2 or CAT3	---
SAFA Ratio	≤ 0,8	≤ 0,8	≤ 0,8
Alliance member	---	---	Star Alliance, One World, Skyteam

¹ For the definition of LOPP-categories (CAT1 – CAT4) refer to [OMM List of Preferred Partners \(LOPP\) \[basis for Edelweiss White List\]](#).

When applying for the approval of a wet lease-in of an aircraft of a TCO, Edelweiss shall demonstrate to FOCA that:

- the TCO holds a valid AOC issued in accordance with ICAO Annex 6;
- the safety standards of the third-country operator with regard to continuing airworthiness and air operations are equivalent to the applicable requirements established by EASA continuing airworthiness and EASA air operations; and
- the aircraft has a standard certificate of airworthiness issued in accordance with ICAO Annex 8.

Edelweiss maintains a record of occasions when lessors are used for inspection by FOCA ([PM 194 CN Notification of All Leases to FOCA](#)).

Edelweiss shall only wet lease-in aircraft from an operator that:

- is not subject to an operating ban published by the European Commission for Mobility and Transport [(EC) No.: 2111/2005 (Black List)]
- has a current SAFA Ratio ≤ 0.8
- is listed on the IOSA-Registry as an IOSA-certified operator
- fulfils the analysis / review of the IOSA Report (IAR) according to [OMM Analysis and Review of IOSA Audit Report \(IAR\)](#).

For any lease-in (except ad-hoc-wet lease-in), Edelweiss shall provide FOCA with the following information:

- The aircraft type, registration markings and serial number
- The name and address of the registered owner
- A copy of the valid certificate of airworthiness
- A copy of the lease agreement or description of the lease provisions, except financial arrangements

- Duration of the lease
- The Leasing Statement by the Lessee (DOC 160)
- In case of a wet lease-in, a copy of the AOC of the third country operator and the areas of operation
- A copy of the valid certificate of insurance covering the scope the leasing.

With the above mentioned leasing statement, Edelweiss confirms that the parties to the lease agreement fully understand their respective responsibilities under the applicable regulations.

12.3.3.1 Limited Wet Lease-In

A limited wet-lease-in is an on-demand approval for specific flights within a specified time frame.

There are two options:

- Ad-hoc wet lease-in
- Short term wet lease-in

12.3.3.1.1 Ad-Hoc Wet Lease-In (Urgent Wet Lease-In)

Leasing on very short notice (ad-hoc) is intended in circumstances where Edelweiss is faced with an immediate, urgent and unforeseen need for a replacement aircraft due to technical reasons (AOG).

If such an unforeseen need arises, OCC shall initiate the ad-hoc wet lease-in process ([PM 402 OG Ad-Hoc Wet Lease-In](#)).

Time limitation

- Longrange: 2 flight legs / 1 pair
- Shortrange: Limited to one production day

The approval may be deemed to have been given, provided that:

- the lessors on the 'white list' are not available for this ad-hoc wet lease-in
- the lessor holds an EASA AOC (Community Operator)
- the routes intended to be flown are within the authorised areas of operations specified in the AOC of the lessor.

FOCA shall immediately be notified by e-mail (sboc@bazl.admin.ch) prior to the use of this provision.

The e-mail shall contain the remark "Urgent Wet Lease-In" and the following details:

- Aircraft type, registration markings and serial number

- Name and address of the registered lessor
- Copy of the lease agreement
- Duration of the lease
- Leasing statement (Edelweiss DOC 160)
- Confirmation from each 'white list' lessor, that they are not available.

Note: For routes to/from outside the community, Traffic Right at FOCA shall be notified by email (trafficrights@bazi.admin.ch) in advance of the flight taking place. The e-mail shall contain the remark "Urgent Wet Lease-In concerning routes outside the community".

The use of such external capacities in the context of an "ad-hoc wet lease-in" shall also be reported to the Partner Monitoring Committee (partnermonitoring@dlh.de).

12.3.3.1.2 Short Term Wet Lease-In

A short term wet lease-in refers to the temporary deployment of external capacity, in particular to cover for operational shortages in extension of the time limitation of an ad-hoc wet lease-in.

Time limitation

A single contract may not exceed 30 days and covers not more than 1 A/C. In addition, a limit of max. 180 sectors in total within a three-month period by the same operator exists. This applies in particular for several single consecutive contracts with the same operator or if there is more than one single contract within a calendar year.

The use of such external capacities in the context of a "short term wet lease-in" shall also be reported to the Partner Monitoring Committee (partnermonitoring@dlh.de).

If any of these limits are likely to be exceeded, a wet lease-in based on a framework approval shall be considered.

12.3.3.2 Wet Lease-In based on a Framework Approval

Wet lease based on a framework approval means a general approval by FOCA of a potential lessor who shall be listed on the Edelweiss "White List" ([OMM Appendix Edelweiss White List](#)).

With the framework approval the following applies:

- The approval is usually valid without any time limitation.
- An aircraft from a lessor on the White List may be wet leased-in without further approval.
- If a lessor does not hold a Swiss operating license and a flight is planned outside the EU Community, traffic rights have to be checked and granted first.

- All leases conducted pursuant to this framework approval must be notified to FOCA on a monthly basis.
- Any change on the White List requires prior approval by FOCA.

Explanation of the White List, processes for the assessment and management of potential lessors are defined and managed jointly within the Lufthansa Group ([OMM Common Airline Risk Assessment \(CARA\)](#) & [OMM List of Preferred Partners \(LOPP\) \[Basis for Edelweiss White List\]](#)).

Logs and records of framework leasing are stored in the Wet Lease-In Checklist in Teams GRP-Traffic-Rights.

12.3.4 Dry Lease-In (temporary)

Note: This option is currently not used by Edelweiss.

12.3.5 Lease-Out

12.3.5.1 Wet Lease-Out

Wet lease-out agreements are not subject to approval, but a notification is mandatory. Prior to the wet lease-out Edelweiss shall notify FOCA (sboc@bazl.admin.ch). The e-mail shall contain the following information:

- Aircraft type, registration markings and serial number
- Name and address of the lessee
- Copy of the lease agreement or description of the lease provisions, except financial arrangements
- Duration of the lease agreement
- Planned area of operation

Edelweiss should verify that:

- the lessee is holding an approval for wet-lease in
- any traffic rights needed have been obtained
- the operations specifications allow such operation (e.g. type/area of operation) before starting operation.

For leasing agreement with a duration longer than 6 months, Edelweiss should verify the need of ICAO 83bis with FOCA.

The operational responsibility remains always with Edelweiss.

12.3.5.2 Dry Lease-Out (temporary)

Note: This option is currently not used by Edelweiss.

12.4 Partner Airline Monitoring

The airlines of the Lufthansa Group have defined joint procedures for monitoring the performance of external operator(s) for the purpose of ensuring the operational safety and security needs in case of transporting Lufthansa Group passengers on their flights through aircraft lease, code share, capacity purchase or another type of agreement.

As a Lufthansa Group company Edelweiss is required to apply this procedure as mandatory measures into their internal policies. The binding nature for all Lufthansa Group operators is based on Lufthansa Executive Board guidelines.

Details of these procedures are defined in the:

- Partner Airline Monitoring Manual (PMM)
- Partner Airline Safety Monitoring Process (PASM)

Edelweiss has incorporated these procedures into the following processes:

- [PM 190 CN Scheduling Seasonal and Additional Flights](#)
- [PM 191 CN Wet Lease-In Based on Framework Approval or Short-Term Wet-Lease](#)
- [PM 192 CN Traffic Rights Request](#)
- [PM 193 CN Codeshare with Third Country Operator](#)
- [PM 194 CN Notification of All Leases to FOCA](#)
- [PM 195 CN Changes to Edelweiss White List and its Approval](#)
- [PM 402 OG Ad-Hoc Wet Lease-In](#)

12.4.1 Common Airline Risk Assessment (CARA)

The jointly developed "CARA"-tool establishes standards for identifying and evaluating operational risks. It is considered the main assessment tool of the Partner Airline Monitoring process and therefore accepted by Edelweiss as the method for assessing and periodically reviewing its wet lease-in partners. The objective is to identifying risk areas or risk chains and subsequently examining the effectiveness of mitigation measures, thus providing a consistent minimum standard within the Lufthansa Group and also supporting management in its decisions regarding the initiation or continuation of cooperation and participation. In conjunction with the objective of ensuring that assessed airlines are monitored on a sustained basis, also risk mitigation measures taken in order to meet the CARA requirements are monitored.

CARA makes use of expertise within the Lufthansa Group and is continually developed further.

Each CARA assessment of a partner airline, having a wet lease-in agreement with Edelweiss (except ad hoc wet lease-in) is documented and available to FOCA on request.

12.4.2 List of Preferred Partners (LOPP) [Basis for Edelweiss White List]

Lufthansa Group partners successfully assessed by the CARA-tool are listed in the List of Preferred Partners (LOPP) and classified in four different categories:

- CAT1 = Lufthansa Group Airlines
- CAT2 = Long-term lease
- CAT3 = Short-term lease
- CAT4 = Codeshare

Each of these categories has different monitoring requirements, updated regularly and managed centrally by the LH Partner Monitoring Committee.

Edelweiss OSQ has established an internal process to ensure the updated LOPP is constantly available to Edelweiss on SharePoint (Public Documents->OSQ Compliance Monitoring->PUBLIC_RO->LOPP) or directly via this link.

Edelweiss is using the LOPP as a reference basis for the development of its own White List. Only partners which are rated by CARA as CAT1 or CAT2 on the current LOPP can be considered for the Edelweiss White List. Partners in these two categories are regularly re-assessed with the CARA method in intervals of 24 month.

The White List ([OMM Appendix Edelweiss White List](#)) contains LHG partner airlines having a current wet lease-in contract with Edelweiss and are approved in accordance with the framework approval process by FOCA (see [OMM Wet Lease-In based on a Framework Approval](#)). Any change to the White List requires prior approval by FOCA.

12.4.2.1 Analysis and Review of IOSA Audit Report (IAR)

Edelweiss OSQ has full access to all IOSA reports for operators listed on the LOPP, via IQSMS LHG CARA.

The IQSMS inspection, internal standard (titled “OMM 12.4.2.1 Analysis and Review of IOSA Audit Report (IAR)”), focuses on the analysis and review of the IOSA Audit Report (IAR) on the topics:

- audit planning process incl. audit intervals (ORG 2.1.5 – 2.1.6 & ORG 2.2.1 – 2.2.2)
- audit finding process (ORG 2.1.7)
- implementation findings raised by the AO/IATA
- SMS related findings (what kind of non-conformity has been raised)

The conclusion/summary of the analysis and review shall be documented in the Management Review of the respective IQSMS inspection.

13 Appendix

13.1 List of other Controlled Documentation

In addition to [OMM Manual Library](#), the following tables lists other supporting, additional controlled documentations of Edelweiss.

13.1.1 E

Manual/DOC	Name of Manual/Doc	Respon-sible Per-son	FOCA Re-vision Process	Format	Access
DOC-62a	Leistungsauftrag Master	EHR	no	EDP	Share-point (COS-MOS)

13.1.2 EH

Manual/DOC	Name of Manual/Doc	Respon-sible Per-son	FOCA Re-vision Process	Format	Access
Anstellung	Allg. Anstellungsbedin-gungen	EH	no	EDP	Share-point (COS-MOS)
GAV	GAV Cockpit	EH	no	EDP	Share-point (COS-MOS)
	GAV Cabin	EH	no	EDP	Share-point (COS-MOS)
Spesen	Allg. Spesenreglement	EH	no	EDP	Share-point (COS-MOS)
DOC-48	Einführungs-Plan	EH	no	EDP	Share-point

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
					(COS-MOS)

13.1.3 O

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process ¹	Format	Access
DOC-100	Edelweiss Safety & Security Policy	O	yes	EDP	Yonder / Sharepoint (COS-MOS)
DOC-101	Edelweiss Compliance Statement	O	no	EDP	Yonder / Sharepoint (COS-MOS)
DOC-102	Edelweiss Fatigue Risk Management Policy	O	no	EDP	Yonder / Sharepoint (COS-MOS)
DOC-160	Leasing-Statement	O	no	EDP	Yonder / Sharepoint (COS-MOS)

¹"yes" means that such manuals can contain elements which require prior approval as per [OMM Changes requiring Prior Approval](#) or no approval as per [OMM Changes not requiring Prior Approval](#). Manuals listed as "no" shall never contain elements which require prior approval.

13.1.4 OC

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
LPC	LPC User and Performance Guide	OCE	no	EDP	Yonder
Loadsheet	Loadsheet Form	OCE	no	hardcopy	aircraft
Duty Time Report	Duty Time Report	FOCA/OC	no	hardcopy	aircraft
ASR	Air Safety Report	OC	no	hardcopy	aircraft
Navigation Error Report	Navigation Error Investigation Report Form	OC	no	hardcopy	aircraft
PDR	Passenger Disturbance Report	OSY	no	hardcopy	aircraft

13.1.5 OG

Manual/DOC	Name of Manual/doc	Responsible Person	FOCA Revision Process	Format	Access
DOC-51	Checklist Aerodrome Evaluation	OG	no	EDP	Sharepoint (COS-MOS)

13.1.6 OS

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process ¹	Format	Access
CHFR	CHFR Cockpit	OSF	no	EDP	Sharepoint (COS-MOS) IQSMS
	CHFR Cabin	OSF	no	EDP	Sharepoint (COS-

Manual/DOC	Name of Manual/Doc	Responsi-ble Per-son	FOCA Re-vision Process ¹	Format	Access
					MOS) IQSMS
	CHFR Ground Staff	OSF	no	EDP	Share-point (COS-MOS) IQSMS
DOC 1	Edelweiss Severity Table	OS	no	EDP	Share-point (COS-MOS)
DOC 2	Edelweiss Probability (Likelihood) Table	OS	no	EDP	Share-point (COS-MOS)
DOC 3	Finding Risk Assessment Quick Reference Guide (applicable for Finding Level 1 & 2)	OSF	no	EDP	Share-point (COS-MOS)
DOC 27	ME Report	OS	yes	EDP	Share-point (COS-MOS)
DOC 39	Management System Ad- vanced Training	OS	no	EDP	Share-point (COS-MOS)
DOC 46	SKPI monitoring Tool	OSF	yes	EDP	Share-point (COS-MOS)
DOC 55	Internal Investigation Form	OSF	yes	EDP	Share-point (COS-MOS)

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process ¹	Format	Access
DOC 57	SAG Agenda	OS	no	EDP	Sharepoint (COS-MOS)
DOC 58	SRB Agenda Items Report	OS	no	EDP	Sharepoint (COS-MOS)
DOC 65	Safety Performance Indicator	OS	yes	EDP	Sharepoint (COS-MOS)
DOC 67	Safety Recommendation	OS	yes	EDP	Sharepoint (COS-MOS)
DOC 68	Group Risk Rating	OS	yes	EDP	Sharepoint (COS-MOS)
DOC 180	MoC Pre-evaluation – Risk Assessment	OS	no	EDP	Sharepoint (COS-MOS)

¹"yes" means that such manuals can contain elements which require prior approval as per [OMM Changes requiring Prior Approval](#) or no approval as per OMM Changes not requiring Prior Approval. Manuals listed as "no" shall never contain elements which require prior approval.

13.1.7 OSQ

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
Audit Plan	Audit Plan (Excel)	OSQ	no	EDP	Sharepoint

Manual/DOC	Name of Manual/Doc	Responsi-ble Per-son	FOCA Re-vision Process	Format	Access
					(COS-MOS)
DOC-34	Audit Extension Request	OSQ	no	EDP	Share-point (COS-MOS)
DOC-38	Initial Auditor & Advanced MS Training Record	OSQ	no	EDP	Share-point (COS-MOS)
DOC-56	Auditor Inspector Guide	OSQ	no	EDP	Share-point (COS-MOS)
DOC-57	OSQ Training Plan Template	OSQ	no	EDP	Share-point (COS-MOS)
DOC-59	Auditor Evaluation Form	OSQ	no	EDP	Share-point (COS-MOS)
DOC-60	IOSA Auditor Training Syllabus	OSQ	no	EDP	Share-point (COS-MOS)
DOC-82	Auditee Guide IQSMS Handling of Finding	OSQ	no	EDP	Share-point (COS-MOS)
DOC-110	Problem Solving Guide – Root Cause Analysis	OSQ	no	EDP	Share-point (COS-MOS)
DOC-105	Audit and Inspection Plan	OSQ	no	EDP	Share-point

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
					(COS-MOS)
DOC-106	List of Auditors	OSQ	no	EDP	Sharepoint (COS-MOS)
Template DOC	Template DOC	OSQ	no	EDP	Sharepoint (COS-MOS)
DOC-56 Appendix 1	Audit Opening & Closing Meeting	OSQ	no	EDP	Sharepoint (COS-MOS)

13.1.8 OSY

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
Cockpit Security Checklist	Cockpit Security Checklist A320	OSY	no	hardcopy EDP	aircraft Yonder
	Cockpit Security Checklist A340	OSY	no	hardcopy EDP	aircraft Yonder
Bomb Search Checklist	Bomb Search Checklist A320	OSY	no	hardcopy EDP	aircraft Yonder
	Bomb Search Checklist A340	OSY	no	hardcopy EDP	aircraft Yonder
Sealing Checklist	Sealing Checklist A320	OSY	no	hardcopy EDP	aircraft Yonder
DOC-47	Security Inspection for WK Aircraft	OSY	no	EDP	Sharepoint (COS-MOS)
DOC-32	Internal Security Test	OSY	no	EDP	Sharepoint

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
					(COS-MOS)
DOC-33	Internal Security Test Checklist	OSY	no	EDP	Sharepoint (COS-MOS)
Security Database	Security Database	OSY	no	EDP	Sharepoint (COS-MOS)

13.1.9 OT

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
DOC 49	Management System Training	OT	no	EDP	Sharepoint (COS-MOS)
EBT Guide	EBT Guide for Management	OT	no	PDF	Sharepoint (COS-MOS)

The PLANNED EMERGENCY PREPARATION / EVACUATION CHECKLIST A320/A340 on the aircraft are part of the CSPM and are revised by OC.

13.1.10 PCO

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
FAK	FAK Inventory List	PCOM	no	hardcopy EDP	aircraft Yonder
A320	Safety Equipment Checklist / Cabin Security Checklist A320 1L	PCO	no	hardcopy EDP	aircraft Yonder

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
	Safety Equipment Checklist / Cabin Security Checklist A320 1R	PCO	no	hardcopy EDP	aircraft Yonder
	Safety Equipment Checklist / Cabin Security Checklist A320 2L	PCO	no	hardcopy EDP	aircraft Yonder
	Safety Equipment Checklist / Cabin Security Checklist A320 2R	PCO	no	hardcopy EDP	aircraft Yonder
A340	Safety Equipment Checklist / Cabin Security Checklist A340 1L	PCO	no	hardcopy EDP	aircraft Yonder
	Safety Equipment Checklist / Cabin Security Checklist A340 1R	PCO	no	hardcopy EDP	aircraft Yonder
	Safety Equipment Checklist / Cabin Security Checklist A340 2L	PCO	no	hardcopy EDP	aircraft Yonder
	Safety Equipment Checklist / Cabin Security Checklist A340 2R	PCO	no	hardcopy EDP	aircraft Yonder
	Safety Equipment Checklist / Cabin Security Checklist A340 3L	PCO	no	hardcopy EDP	aircraft Yonder
	Safety Equipment Checklist / Cabin Security Checklist A340 3L BUNK	PCO	no	hardcopy EDP	aircraft Yonder
	Safety Equipment Checklist / Cabin Security Checklist A340 3R	PCO	no	hardcopy EDP	aircraft Yonder
	Safety Equipment Checklist / Cabin Security Checklist A340 4L	PCO	no	hardcopy EDP	aircraft Yonder

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
	Safety Equipment Checklist / Cabin Security Checklist A340 4R	PCO	no	hardcopy EDP	aircraft Yonder

13.1.11 PCU

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
Uniform	Uniformreglement	PCU	no	EDP	Yonder

13.1.12 T

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
Damage Report	Damage Report	T	no	hardcopy	aircraft
A320	PAX Safety Card A320	T	no	hardcopy	aircraft
	Cockpit Inventarliste A320	T	no	hardcopy	aircraft
	Maintenance Checklist A320	TM	no	EDP	Yonder
	Technical Training Manual Pilot Pre-Flight Check A320	T	no	EDP	Yonder
A340	PAX Safety Card A340	T	no	hardcopy	aircraft
	Cockpit Inventarliste A340	T	no	hardcopy	aircraft
	Maintenance Checklist A340	TM	no	EDP	Yonder
	Technical Training Manual Pilot Pre-Flight Check A340	T	no	EDP	Yonder

Manual/DOC	Name of Manual/Doc	Responsible Person	FOCA Revision Process	Format	Access
DOC-64	Instruction Revision Technical Manuals	TO	no	EDP	Sharepoint (COS-MOS)
SAFA	SAFA Inspection Guide	TO	no	hardcopy	aircraft

13.1.13 FOCA approved Contracts

The following list contains only contracts, that need to be approved by FOCA.

Purpose	Partner	EDW	Note
Basic Agreement on Technical Services	SWISS	T	FOCA Approval: 03.10.2022

13.2 Edelweiss White List

The following list contains all potential lessors having a current wet lease-in contract with Edelweiss and are approved in accordance with the framework approval process by FOCA (see [OMM Wet Lease-In based on a Framework Approval](#)).

This enables Edelweiss to wet lease-in an aircraft from all listed lessors without further approval from FOCA. However, when the lessor does not hold a Swiss operating licence and a flight is planned outside the EU Community, traffic rights must be checked and granted **before** the intended flight.

	Name of Lessor	AOC Number	Note
1	Swiss International Air Lines Ltd	CH.AOC.1006	FOCA Approval: 23.06.2022
2	--	--	--
3	--	--	--
4	--	--	--
5	--	--	--
6	--	--	--

Any change to this White List requires prior approval by FOCA.

All leases conducted with any of the listed lessors above must be notified to FOCA for operational oversight on a monthly basis ([PM 194 CN Notification of all Leases to FOCA "AA"](#)).

13.3 Subcontractor Matrix

Following table serves as a guideline and is not complete:

Re-sponsi-bility	Service/Contract/Activity	Means of Monitoring	Inspections perf. by	Generated Report	Frequency of Insp.
OG	Ground handling	Audit Inspection Daily ops	OG OG/Crew	Audit report Insp. report IQSMS	36 months yearly acc. EASA
	Supervision	Daily ops	Crew	IQSMS	acc. EASA
	Flight dispatch	Audit Daily ops	OSQ Crew/OG	Audit report IQSMS	acc. need acc. EASA
	Cargo agent	Inspection	OG	Insp. report	acc. need
	Security	Audit	OSY	Audit report	risk-based
	Cargo	Audit	OSY	Audit report	risk-based
T	Base maintenance	Audit Inspection Personal presence	OSQ OSQ/T T	Audit report Insp. report Customer compl.	Yearly acc. need acc. need
	Line maintenance	Audit	TMM	Audit report	ZRH: 12 months Other: 24 - 48 months
OSQ	Wet/dry lease lessor	Daily ops, audit the auditor, LHG list of preferred partners (LOPP)	OSQ	minutes, reports	continuously
OS	IQSMS Modules by ASQS Austria	Audit daily ops	OS	Audit report	24 months
OC	FMS database	Audit Daily ops	OSQ/OCE Crew	Audit report IQSMS	acc. need daily

Re-sponsi-bility	Service/Contract/Activity	Means of Monitoring	Inspections perf. by	Generated Report	Frequency of Insp.
	Navigation charts, Lido (eRM)	Audit Daily ops	OSQ Crew	Audit report IQSMS	acc. need daily
	Performance and mass & balance software	Audit Daily ops	OSQ Crew	Audit report IQSMS	acc. need daily
F	Fuel supply	Audit Inspection Fuel/water check	Fuel pool OSQ/OG Crew	Audit report Insp. report IQSMS	acc. need yearly acc. need
P	Catering	Audit Daily ops	P Crew	Audit report IQSMS	acc. need daily
	Catering Security	Audit	OSY	Audit report	risk-based
OT (ATO)	Simulator	Audit Inspections Simulator use	OSQ OSQ/OT Instructor	Audit report Inspection report Info to OT	acc. need yearly acc. training sched.
	RGC courses	Audit participation of OSQ/OT/PCT	OSQ/OT/PCT	Audit report written complaint	acc. need minimum yearly

13.4 List of Regular Meetings

13.4.1 General

Below listed meetings are regularly held meetings listet by department. Additional meetings are called on an ad-hoc basis. The department stated in the title is the head of the respective meeting and likewise a participant. Participants mentioned in parenthesis can be invited to the respective meeting, however, are not present on a regular basis. The frequency of the meetings stated should be understood as a reference. Reasonable variations may be accepted. Meeting protocols should be written, except for informational sessions.

13.4.2 C

Meeting	Participants	Purpose	Frequency
CCO Meeting	C, CS, CM, CO, CR, CD	Information Exchange and steering of work packages	bi-weekly
WK/LX Performance Meeting	C, CS, CR, CD, ED	Information and Exchange and steering of work packages	bi-weekly
OOM	C, CS, CR, CO, CM, ED	Execution and coordination of work packages	weekly

13.4.3 E

Meeting	Participants	Purpose	Frequency
GL	GL	Company relevant topics and policies. Safety Review Board.	Bi-weekly
Edelweiss-Info-Events (CEO-hour)	All employees	Information of employees by management, changes, diverse topics.	On demand (approx. 1 - 2 / year)

13.4.4 OG

Meeting	Participants	Purpose	Frequency
OG/OCC	Department	Instruction/information	10 / year
GOSP LX	OG	SWISS Ground Operation Safety Panel	12 / year
OG/OSQ	OG, OSQ	Information exchange and monitoring of audits & inspections	12 / year
Pool Meeting with LX acc. SLA	OG	Information exchange, audits, cargo, fuel, water de-icing topics	3 / year

13.4.5 O

Meeting	Participants	Purpose	Frequency
O-MTG (Accountable meeting, open session)	E, EH, OS, OSQ, OSY, PC(O), O, OC, OT, OG, OP, OCE, OCF, TO	Ops issues Projects Communication Interdepartemental coordination conc. training, policies, procedures Compliance report, status (i.e. findings, legal amendment changes, SAFA/SACA inspections)	10 / year
Directors Briefing	OS, OC, OP, OT, OG	General information exchange	2 - 4 / month
UPG Evaluation	OC, OT	Evaluation of upgrader	on demand
LIDO-Meeting	OC, LIDO	Gen. information exchange. Sharing and discussing Crew feedback about LIDO, OM C from FCR.	2 - 4 / year

13.4.6 OPR

Meeting	Participants	Purpose	Frequency
Planning / Crew Control	Crew Control	Exchange of experience/planning	3 / year

13.4.7 OS

Meeting	Participants	Purpose	Frequency
SAG	Flight OPS, Cabin OPS, Ground OPS, Technic, OS, OSF, OSY,	Active control of operational safety risks. Hazard identification.	4 / year

Meeting	Participants	Purpose	Frequency
	OSQ, Accountable Manager		
FSAG	Flight OPS, Cabin OPS, Planning, OS, Unions (AERO-PERS, Edelweiss Air Flight Attendant Association), Accountable Manager (optional)	Proactive, reactive and predictive identification of hazards and the management of fatigue risks.	4 / year
Management Evaluation (SRB)	Same as participant in the SRB-Meeting	Safety, security and compliance analysis. Safety Review Board.	2 / year
SRB	OS, Accountable Manager, Flight Ops, planning, Crew Training, Engineering (TE) & Maintenance (TW), Cabin Management	The Safety Review Board (SRB) considers strategic safety functions and analyses the safety performance of the company.	2 / year
OS-Team Meeting	OS, OSQ, OSY, OSF	Exchange of organisational and administrative topics within Safety Assurance.	on average every 6 weeks or as required

13.4.8 OSQ

Meeting	Participants	Purpose	Frequency
Compliance monitoring, auditor meeting or auditor recurrent training news	Auditors	General compliance issues Recurrent training Standardisation meetings/training Planning of audits/inspections	2 / year
OSQ	OSQ	Team meeting (update of Accountable Manager meeting, projects, etc.)	on request/demand
Technical compliance meeting	SWISS Technics, T, OSQ	Audit planning/sharing. Review of findings/performance	3 / year

13.4.9 OT

Meeting	Participants	Purpose	Frequency
Training	OT, OC, OS, OSY	Discussion and coordination of training needs (e.g. Safety, Security) and reevaluation of new SOP concerning impact on Flight safety.	2 / year
Instructors	Cockpit-Instructors	Dissemination of information to instructors (e.g. from ext. sources) Development of SOP Discussion about training programs (Sim, Linie) Training issues Policies Instructions Procedures Personal (selection of up-graders und new instructors) Feedbacks	2 / year

13.4.10 P

Meeting	Participants	Purpose	Frequency
P Meeting F2F with P	P Manager P / P-Manager	Information exchange and update. GL Topics. General P Leadership	2 / month weekly
P General Meeting	All P Members	Information exchange and update, special guests	4 / year
PC Teammeetings	PC/MCC/ OMCC PCO/ PCT partly	Information exchange and update Guests from other departments	6 / year
PC Meetings	MCC	Information exchange and update	weekly
	PCT/PCO	Information exchange and update	2 / month
PCO	PCO	Information exchange and update. IQSMS Reports review and actions.	weekly
PCO – PCOM	PCO & PCOM	Information exchange and update. Analysis of medical issues, PAX & Crew, actions. Development of SOP. Medical equipment.	fortnightly
PCOM	Medical Instructors	Information exchange. Discussion about training programmes and training issues. New SOP.	on request
Cabin Safety	PCO & OSF	Cabin safety assurance and performance review. Hazard identification. Development of SOP.	6 / year
PCT	Cabin Instructors	Information exchange. Discussion about training pro-	4 / year

Meeting	Participants	Purpose	Frequency
		grammes and training issues. New SOP.	
PI Meetings	Teambriefing Teambriefing Catering Review	Information exchange and update. IQSMS Reports review and actions. Analysis of inflight product issues, PAX & crew, actions. Development.	daily 2 / month
P/T	PD, TE, TO, PCO, PCT	Discussion/definition of cabin equipment. Modification of aircraft in the areas of: cabin layout; airshow/IFE/PRAM; fleet standardisation; training; legally required modifications.	monthly

13.4.11 T

Refer to [CAME Meetings](#).