ELBRUS AIRWAYS

Regulatory and Safety

DOCUMENT	GOV-07
REVISION	1.5
EFFECTIVE	3 September 2026
OWNER	Director of Safety, Quality and Security
CLASSIFICATION	Controlled document. Uncontrolled when printed.

PREPARED BY

APPROVED BY, MAHER ABAZA, CHAIRMAN OF THE BOARD

Amendment Record

Issue	Date	Summary of amendment
1.5	3 September 2026	Initial issue.

Contents

1 Regulatory Basis

The Airline operates to the Standards and Recommended Practices of the Convention on International Civil Aviation, as adopted by the civil aviation authority of Circassia and Abkhazia. The following Annexes govern the operation directly.

Annex	Subject	Application
1	Personnel Licensing	Licences, ratings and medical certification of flight and cabin crew
6, Part I	Operation of Aircraft	Operating rules, flight time limitations, and the operations manual
8	Airworthiness of Aircraft	Continuing airworthiness and the maintenance programme
13	Aircraft Accident and Incident Investigation	Notification, preservation of evidence, and cooperation with an investigation
17	Security	The Airline's aviation security programme
18	The Safe Transport of Dangerous Goods by Air	Acceptance, handling and carriage, with the Technical Instructions
19	Safety Management	The safety management system and the State safety programme interface

Where an Annex places an obligation on the operator without setting a figure, the Airline writes its own standard and calibrates it against European Union Aviation Safety Agency practice. This is a technical benchmark and not an adoption. The Airline's standards are its own and are approved by its own authority, and they are set at levels a lessor, a maintenance organization and an insurer already recognize.

The Airline complies with the operating requirements of every state whose airspace it enters and every state in which it operates. Where a requirement of a state served is stricter than the Airline's own standard, the stricter requirement applies to that operation.

2 Certification and Approvals

The Airline holds an air operator certificate issued by the civil aviation authority of Circassia and Abkhazia. No scheduled service is operated without it.

That authority is not yet established. Until it is, the Airline builds and holds its compliance in advance: the operations manual, the maintenance programme, the safety management system, the security programme and the flight time limitation scheme are written, maintained and kept in the condition in which they would be submitted. Nothing in this document describes a capability the Airline intends to acquire after certification.

Approval	Issued by	Status
Air operator certificate	Civil aviation authority of Circassia and Abkhazia	On establishment of the authority
Flight time limitation scheme	The same authority	Submitted on establishment, governs planning in the meantime
Aviation security programme	The same authority	The same
Continuing airworthiness management approval	The same authority	The same
Acceptance of nominated postholders	The same authority	The same
Approval of contracted training organizations	The same authority	The same
Foreign operator permit	Each state served	Sought on designation under a bilateral agreement
Third country operator authorisation	European Union Aviation Safety Agency	Required before any service to a state of the European Union, and not held

The nominated postholders through whom the Airline discharges its obligations to its authority are established in Human Resources and Organization, GOV-08, under Nominated Postholders. No operation is conducted while a postholder position is vacant and unfilled by an accepted alternate.

3 Oversight and Compliance Monitoring

The Airline operates a compliance monitoring function independent of the operating directorates. It sits in Safety, Quality and Security, which reports to the Chief Executive Officer directly and holds unrestricted access to the Board, as established in GOV-08.

The function operates a rolling audit programme covering every area of the operation and every contracted provider, being maintenance, ground handling, catering and training. A finding is raised with a classification, a responsible manager, a root cause and a closure date, and no finding is closed without evidence that the cause has been addressed. Audit results and the state of open findings are reported to the Safety Review Board.

The Chief Executive Officer is the Accountable Manager and holds, personally and without delegation, the corporate authority and the financial and human resources required to conduct the operation to the standard in this document.

4 Safety Management System

The Airline operates a safety management system in accordance with Annex 19. It rests on four components.

4.1 Safety Policy and Objectives

The Airline's safety policy is issued and signed by the Accountable Manager, states the Airline's commitment to the safety standard in this document, and is communicated to every employee and to every contracted provider.

Safety accountability rests with the Accountable Manager. The Safety Manager administers the system, holds direct access to the Accountable Manager, and does not hold an operating post. Every director is accountable for the safety performance of their directorate.

The Safety Review Board, chaired by the Chief Executive Officer, holds safety performance, safety objectives and the resourcing of safety actions. The Safety Action Group, chaired by the Director of Safety, Quality and Security, holds hazard identification, occurrence review and delivery. Both are established in GOV-08 under Committees.

4.2 Safety Risk Management

Hazards are identified from three sources: occurrence reports and investigations, which are reactive; audits, safety surveys and flight data monitoring, which are proactive; and the analysis of trends and of change, which is predictive.

Every identified hazard is assessed for the severity of its credible consequence and for the likelihood of that consequence, and is placed on a five by five risk matrix. Risk in the intolerable band stops the activity until it is mitigated. Risk in the tolerable band is accepted only with mitigation in place and with the residual risk recorded. Risk in the acceptable band is monitored.

The Airline maintains a safety risk register. It records the hazard, the assessment, the mitigation, the owner and the residual risk, is reviewed by the Safety Action Group monthly, and is presented to the Safety Review Board quarterly.

Every change to the operation is assessed before it takes effect, including a new route, a new aerodrome, a change of aircraft type or configuration, a change to the schedule affecting duty or turnaround, a change of contracted provider, and a change to a nominated postholder.

4.3 Safety Assurance

The Airline measures its safety performance against indicators set by the Safety Review Board and reviewed annually. The indicators cover occurrence rates by category, stabilised approach and go-around performance, technical dispatch reliability, ground damage, fatigue reports, and the closure of audit findings. Alert levels are set against the Airline's own accumulated data rather than adopted from another operator, and until that data exists the indicators are monitored without alert levels rather than set against an invented one.

Flight data monitoring operates on the jet fleet from entry into service. Data is de-identified before analysis, and its use is governed by the reporting protection below.

The Airline audits itself against this document and against every approval it holds, and audits every contracted provider on whose performance the safety of the operation depends.

4.4 Safety Promotion

Safety training is given to every employee on joining and recurrently, at a depth matched to the post. The Airline publishes the lessons of its own occurrences internally, in de-identified form, on the principle that an occurrence which teaches nobody has been wasted.

5 Occurrence Reporting and Just Culture

Every employee reports a safety occurrence, an error or a hazard, including their own. Mandatory occurrences are reported to the civil aviation authority within the period that authority sets, and to the state of occurrence where its rules require it. The Airline also operates a confidential reporting channel for a report an employee is unwilling to make openly.

A person who reports is not subject to disciplinary action arising from that report. The protection does not extend to willful misconduct, to gross negligence, or to the operation of an aircraft under the influence of alcohol or drugs. This is the Airline's governing statement of just culture, and it is carried into the terms of employment by Human Resources and Organization, GOV-08.

The line between an honest error and a culpable act is drawn by the Safety Review Board and not by the manager of the person reporting.

6 Fatigue Risk Management

The Airline operates a fatigue risk management system against the flight time, flight duty period and rest limitations published in Fleet and Operations, GOV-02. Those limitations are the prescriptive boundary. The fatigue risk management system is what establishes that the operation is safe inside them.

1. **Policy.** Fatigue is a hazard managed under the safety management system, and a fatigue report is an occurrence report carrying the protection above.
2. **Data.** The Airline collects rostered against actual duty and block time, fatigue reports, and the pairings and rotations that generate them. Crew pairings are published in the Network Schedule, GOV-03A.
3. **Assessment.** Pairings are assessed before publication and reviewed against what they produce. A duty that repeatedly generates fatigue reports is re-cut whether or not it sits inside the limitations.
4. **Mitigation.** Available mitigations are re-timing, re-crewing, an additional layover, and a reduction in sectors, and the operation is flown at the limitation rather than at the mitigation only where the assessment supports it.
5. **Assurance.** The Safety Action Group reviews fatigue data monthly and the Safety Review Board reviews the effectiveness of the system annually. The Airline holds one crew domicile, at Sochi, and four layover points. Fatigue risk is assessed against that structure, and any change to it is a change assessed under Safety Risk Management above.

7 Emergency Response and Accident Investigation

The Airline maintains an emergency response plan covering notification, the crisis management structure, the accident site, communication with families and with the public, and the continuity of the remaining operation. The plan is published as Emergency Response, GOV-07A, which sets the levels of activation, the Emergency

Control Centre and its alternate, the response by post, the notification timings, the go-team, and the humanitarian assistance response. The plan is exercised annually and after any material change to the network or the fleet.

An accident or serious incident is notified without delay to the civil aviation authority of Circassia and Abkhazia and to the state of occurrence. Investigation is the responsibility of the state under Annex 13. The Airline's duty is to notify, to preserve evidence, to cooperate fully, and to act on the findings whether or not it is required to.

The Airline provides assistance to the families of those on board, beginning at notification and not at the conclusion of an investigation.

8 Aviation Security

The Airline maintains an aviation security programme under Annex 17, approved by its civil aviation authority and applied at every airport served. It covers passenger and baggage screening interfaces, hold baggage reconciliation, cargo and mail acceptance, aircraft security checks and searches, the security of the aircraft on the ground, and the vetting and training of employees and contracted staff with access to the aircraft or to restricted areas.

The programme is held by the Security Manager in Safety, Quality and Security. Information security is held by the Chief Technology Officer under GOV-08. Where an event touches both, it is escalated to the Safety Review Board, which decides which function leads it.

9 Dangerous Goods

The Airline does not accept dangerous goods as cargo. It carries dangerous goods only as permitted in passenger baggage under the Technical Instructions, as company material required for the operation, and as items carried under an exemption granted by its civil aviation authority.

Staff who accept passengers, baggage or cargo, and crew, are trained to recognize an undeclared dangerous good and to refuse it. This limitation is reviewed when the Airline's cargo activity, established in Commercial and Customer Experience, GOV-05, grows beyond belly capacity on the jet fleet.

10 Identification

The Airline's registered name and designators are recorded in the Charter, GOV-00, under Registered Identification. That section is authoritative and prevails over any discrepancy. The particulars below are reproduced here for regulatory filing reference only.

Item	Value
Aircraft nationality prefix	RA-
IATA airline designator	E1
ICAO airline designator	EUS
ICAO radiotelephony callsign	ELBRUS

The ICAO airline designator and radiotelephony callsign are confirmed through ICAO Doc 8585 application. The IATA airline designator is assigned directly by IATA.

Flight numbers are published as the ICAO airline designator followed by the flight number. The radiotelephony callsign is used for all air traffic services communication.