

Emergency Response

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1 Scope

This document is the emergency response plan required by Regulatory and Safety, GOV-07, under Emergency Response and Accident Investigation. It applies to every flight the Airline operates, to every airport it serves, and to every person on board, on the ground and in the workforce affected by an event within its scope.

It governs the Airline's response to an accident, a serious incident, and any other event that overwhelms the normal operating and management structure. It does not govern routine disruption, delay, cancellation or denied boarding, which are handled under Service Recovery in Commercial and Customer Experience, GOV-05. It does not govern an information security incident, which is held by the Chief Technology Officer under Human Resources and Organization, GOV-08, unless that incident affects the conduct of a flight, at which point this plan applies and GOV-07 decides which function leads.

Nothing in this plan displaces the authority of the pilot in command over the aircraft and its disposition, or the authority of the duty operations controller on the day of operation. Both are established in GOV-08 and both sit outside the management chain.

2 Basis

The plan is written to Annex 13 and Annex 19 to the Convention on International Civil Aviation and to the guidance in ICAO Doc 9973, Assistance to Aircraft Accident Victims and their Families.

Where those instruments place an obligation on the operator without setting a figure, the Airline calibrates against European Union practice, which is the same technical benchmark GOV-07 applies across the regulatory framework. The Airline adopts voluntarily, and as a standard it holds itself to rather than one imposed on it, the assistance obligations of Regulation (EU) No 996/2010 and the advance payment obligation of Regulation (EC) No 2027/97 as amended. Voluntary adoption does not create a right of action against the Airline that the applicable law does not otherwise confer, and does not extend to any obligation placed by those instruments on a state or on an accident investigation authority.

Liability for death, injury, baggage and delay is governed by the Montreal Convention 1999 and by the conditions of carriage published under GOV-05. Nothing in this plan enlarges, limits or waives that liability, and no act of assistance under this plan is an admission of it.

3 Activation

The plan operates at three levels. The level is set on what is known at the time and not on what is later established.

Level	Triggering event	Effect
Full	An accident, a serious incident, an aircraft missing or unreported, or an event involving death or serious injury to a person on board	The Emergency Control Centre opens, the full Crisis Management Team is called, and the humanitarian assistance response is mobilised
Partial	An act of unlawful interference, a security event, a diversion or evacuation without serious injury, a serious ground damage event, or the death of a person on board from any other cause	The Emergency Control Centre opens and the Crisis Director calls the roles the event requires
Monitoring	An event that may escalate to either level above, including an aircraft in an abnormal situation that has not yet landed	The duty operations controller maintains a log, and the Crisis Director is informed and remains available

Activation at any level may be declared by the duty operations controller, the Director of Safety, Quality and Security, or the Accountable Manager, and by no one else. The duty operations controller declares without seeking approval and reports the declaration afterwards.

Where the information available supports two levels, the higher is declared. A level is reduced, or the plan stood down, only by the Accountable Manager and only after the Crisis Management Team has recorded that the reduction is supported. A stand down is logged with its time and its reason.

4 Emergency Control Centre

The Emergency Control Centre is the single place from which the response is directed. It is a function and a record rather than a room, and it is capable of convening on a conference bridge when no facility can be reached.

Facility	Location	Purpose
Primary	Sochi (AER), at the Airline's base	The default centre, alongside operations control
Alternate	Sukhum (SUI)	Used where Sochi is the site of the event, is closed, or cannot be reached
Bridge	A standing conference bridge and call list	Convenes the Crisis Management Team from any location, and is the first thing opened at any level

The alternate is at Sukhum and not at a mainland point because an alternate depending on the same airport, the same airspace and the same air navigation service as the primary is not an alternate. Sukhum is the Airline's continuity point under GOV-07.

The Emergency Control Centre keeps a single master log of every decision, every notification and the time of each. That log is the Airline's record of its own conduct and is retained under Records and Evidence below.

5 Crisis Management Team

The team is constituted by post. No post is held by name in this document, and the deputy and alternate arrangements in GOV-08 apply, so that every role below is filled by an accepted alternate where its holder is unavailable or is affected by the event.

Role	Post	Holds
Crisis Director	Chief Executive Officer, as Accountable Manager	The response as a whole, the level of activation, and the Airline's position
Deputy Crisis Director	Chief Operating Officer	The response in the Crisis Director's absence, and the operating roles
Safety and Evidence	Director of Safety, Quality and Security	Notification to the authorities, preservation of evidence, and the interface with the investigation
Operations	Director of Flight Operations	The aircraft, the crew, the remaining schedule, and crew support
Technical	Director of Engineering and Maintenance	Aircraft records, maintenance history, and technical support to the investigation
Stations	Director of Ground Operations	The station at the site, the handling agents, and the reception of families at airports
Humanitarian Assistance	Director of Human Resources	The assistance cadre, the assistance provider, and the family assistance centre
Communications	Chief Commercial Officer	Public statements, the enquiry line, the digital channels, and customer contact
Legal and Insurance	Chief Financial Officer	Insurers, lessors, advance payments, and legal advice
Systems and Data	Chief Technology Officer	The list of persons on board, systems continuity, and the data the response depends on
Log Keeper	Nominated by the Crisis Director at activation	The master log, and nothing else

The Log Keeper holds no other role in the response. A person directing the response does not keep the record of it.

6 Notification

Notification runs on time, not on completeness. An initial notification is made on what is known and is corrected as more is established.

Step	By	Within
Report of the event to the duty operations controller	The pilot in command, the station, or whoever holds the information	Immediately
Alert to the Crisis Director and the Director of Safety, Quality and Security	The duty operations controller	15 minutes of the report
Declaration of the level, and opening of the bridge	The Crisis Director	30 minutes of the report
Notification to the civil aviation authority of Circassia and Abkhazia and to the state of occurrence	The Director of Safety, Quality and Security	Without delay, and in any event within one hour of the report
Notification to the insurer, to the lessor of the aircraft, and to the maintenance provider	The Chief Financial Officer and the Director of Engineering and Maintenance	Two hours of the report
A validated list of the persons on board, provided to the investigating authority	The Chief Technology Officer	Two hours of the report

The Airline notifies. It does not investigate. Investigation is the responsibility of the state under Annex 13, and 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 list of persons on board is produced from the departure control system and validated against the boarding record before it is issued. The Airline holds, for each passenger who provides one, the name and contact details of a person to be notified in the event of an accident. That detail is offered at booking, is not a condition of carriage, is used for no other purpose, and is disclosed only to the authority conducting the investigation and to the person named.

7 Station Response

At every airport served, the immediate response on site is directed by that airport's own emergency plan under the airport authority, and the Airline supports it. The Airline does not direct an airport emergency.

The Airline holds company staff at Sochi and at no other point. At every other airport its first representative is the duty manager of the contracted handling agent, who acts for the Airline until Airline staff arrive. Every ground handling agreement the Airline enters carries a clause obliging the agent to notify the Airline immediately, to act for it within the airport emergency plan, to hold and preserve the documents of the flight, and to make no statement on the Airline's behalf. An agreement without that clause is not entered.

8 Go-Team

The Airline dispatches a go-team to the site of an accident at Full activation. It is led by the Director of Safety, Quality and Security, does not exceed eight persons, and carries technical, operations, station and humanitarian assistance representation. Its purpose is to support the investigating authority and the Airline's own people. It conducts no investigation of its own and it makes no public statement.

The go-team departs within twelve hours of notification. The Airline holds no spare airframe, so where a company aircraft is used it is released from the schedule in this order: a DHC-6, where the site lies within its range and on the same side of the main Caucasus divide, then an E175 on a domestic feeder rotation, then an E195 on the Russia trunk, and an international gateway rotation last. Where no aircraft can be released inside the window, the go-team travels by commercial or chartered service. The departure of the go-team is not delayed to await a company aircraft.

9 Humanitarian Assistance

Assistance to the families of those on board begins at notification and not at the conclusion of an investigation. It is provided irrespective of any question of liability, is not conditional on the signature of any release, waiver or settlement, and is not withdrawn because a claim is made.

The response is built on two resources, because an establishment of 300 positions, of which 147 are crew required to fly the remaining schedule, cannot on its own hold a ratio of one assistant to one family on the Airline's largest aircraft.

1. **The assistance cadre.** Sixty volunteer positions drawn from every directorate, trained before appointment, held on a call list, and released from their normal duties on activation. The cadre alone holds a ratio of one to one for a full E175, and holds the response for a full E195 until the provider mobilises.
2. **The assistance provider.** A specialist provider under standing contract, mobilising within 24 hours of activation, carrying the requirement above the cadre, the telephone enquiry centre above the capacity of the Airline's contact centre, and any response at a point where the Airline holds no staff. The Airline establishes a family assistance centre in the vicinity of the site, and a reception facility at the airport of departure and at the airport of destination. Each family is offered a single named point of contact, and that point of contact does not change. Travel, accommodation and subsistence for the immediate family are met by the Airline.

The Airline makes an advance payment of not less than the equivalent of 16,000 Special Drawing Rights in respect of each passenger who has died, to the natural person or persons entitled to claim, within fifteen days of the identification of that person. An advance payment meets immediate economic need, is not a recognition of liability, and is set off against any sum subsequently payable. It is not recoverable except where the person who received it was not entitled to it, or caused or contributed to the damage.

Information about a person on board is given to that person's family before it is given to the public. No name is released by the Airline. Identification of the deceased and release of identity are matters for the authorities of the state of occurrence.

10 Communication

The Airline issues a first public statement within sixty minutes of confirming the event, from a pre-approved holding text. The statement confirms what is known, states what the Airline is doing, and gives the enquiry line. It carries no speculation as to cause, no attribution of fault, and no comment on any matter within the investigation.

One spokesperson speaks for the Airline, nominated by the Crisis Director. No other employee, agent or contractor makes any statement about the event. Communication is issued in Adyghe or Abkhaz, in English, and in the principal language of the destination served.

On activation the Airline's website is switched to a prepared page carrying the statements, the enquiry line and the assistance information, and commercial content is withdrawn from the website and from every digital channel until the Crisis Director restores it.

II Continuity of the Remaining Operation

The part of the schedule not affected by the event continues, and the decision to suspend, reduce or ground is taken and recorded rather than allowed to happen.

1. The crew of the flight involved, and any crew member affected by the event, are removed from the roster and are not rostered again until cleared as fit by an aviation medical examiner. Critical incident support is made available to every employee, contractor and cadre member involved in the event or in the response to it, and its use is confidential and is not recorded against the individual.
2. Where the state of occurrence requires testing of the crew after an accident, the Airline supports it and does not obstruct it.
3. The decision whether to suspend operation of an aircraft type is taken by the Accountable Manager on the advice of the Director of Safety, Quality and Security, and is taken on safety grounds alone.
4. Passengers of a cancelled or suspended service are handled under Service Recovery in GOV-05, and the event is not a ground for reducing what that section entitles them to.
5. The Airline's obligations to the families and to the investigation take precedence over recovery of the schedule.

12 Records and Evidence

On activation the Airline preserves, and places beyond alteration or routine deletion, the flight documentation and load sheet, the technical log and the maintenance records of the aircraft, the continuing airworthiness records, the crew rosters and duty records, the flight data monitoring records, the dispatch and operations control records, the departure control and reservation records, the recordings and logs of the operations control desk, and the master log of the response itself.

Records within the scope of an investigation are released to the investigating authority, and are released to no other party except as the law requires or the authority permits. The Airline conducts no internal enquiry that prejudices the investigation of the state.

The protection of the reporter established under the safety management system in GOV-07 applies to every report arising from an event under this plan. Records are retained for not less than five years, or until the investigation is closed and every claim arising from the event is settled, whichever is later.

13 Training and Exercise

No person takes a role in the Crisis Management Team or in the assistance cadre before being trained for it, and that training is repeated every two years.

Exercise	Frequency
Call-out test of the Crisis Management Team and the cadre call list, unannounced	Quarterly
Tabletop exercise of the plan	Annually
Full-scale exercise, with the assistance provider and at least one airport served	Every two years

The plan is exercised in addition after any material change to the network, the fleet or the management structure. Every exercise is written up, and each finding is tracked to closure through the Safety Action Group under GOV-07.

14 Ownership and Review

The Director of Safety, Quality and Security owns this plan and keeps it current. The Accountable Manager is accountable for the Airline's response under it.

The plan is reviewed annually, after every exercise, and after every activation. Adoption of the plan, and any material amendment to it, are matters reserved to the Board under GOV-08 as part of the safety management system.