



SAFETY PROGRAM List of Effective Pages

| PAGE | DATE | REVISION |
|---------------|-------------|-----------------|
| I | 07-22-20 | Rev. 16 |
| TOC | 07-22-20 | Rev. 16 |
| Safety Policy | | |
| 1-1 | 07-22-20 | Rev. 16 |
| 1-2 | 07-22-20 | Rev. 16 |
| 2-1 | 07-22-20 | Rev. 16 |
| 2-2 | 07-22-20 | Rev. 16 |
| 2-3 | 07-22-20 | Rev. 16 |
| 3-1 | 07-22-20 | Rev. 16 |
| 4-1 | 07-22-20 | Rev. 16 |
| 4-2 | 07-22-20 | Rev. 16 |
| 5-1 | 07-22-20 | Rev. 16 |
| 6-1 | 07-22-20 | Rev. 16 |
| 7-1 | 07-22-20 | Rev. 16 |
| 8-1 | 07-22-20 | Rev. 16 |
| 9-1 | 07-22-20 | Rev. 16 |
| 9-2 | 07-22-20 | Rev. 16 |
| 10-1 | 07-22-20 | Rev. 16 |
| 11-1 | 07-22-20 | Rev. 16 |
| 12-1 | 07-22-20 | Rev. 16 |

SAFETY PROGRAM TABLE OF CONTENTS

| | | |
|------------|---|------|
| | Wings Airways Safety Policy | |
| Chapter 1 | Responsibilities for the Safety Program | 1-1 |
| Chapter 2 | Duties of Management and Employees Under the Safety Program | 2-1 |
| Chapter 3 | Accident Prevention Program | 3-1 |
| Chapter 4 | Accident/Incident Investigation Program | 4-1 |
| Chapter 5 | Safety Audits and Inspections | 5-1 |
| Chapter 6 | Safety Officer Qualifications | 6-1 |
| Chapter 7 | Safety Awards | 7-1 |
| Chapter 8 | Safety Committees and Meetings | 8-1 |
| Chapter 9 | Hazard Reporting | 9-1 |
| Chapter 10 | Safety Program Training | 10-1 |
| Chapter 11 | Revision and Review | 11-1 |
| Chapter 12 | Emergency Response Plan | 12-1 |



SAFETY POLICY

Safety is a top priority in all our activities. We are committed to developing and improving our Safety Culture and its processes to ensure that all our aviation activities maintain the highest level of safety performance.

We are committed to:

- a) Developing a **safety culture** in all our aviation activities that recognizes the importance and value of effective aviation safety management and acknowledges at all times that safety is paramount;
- b) Clearly defining, for all employees, their accountabilities and responsibilities for the development and delivery of aviation safety strategy and performance;
- c) Minimizing the risks associated with our operation to a point that is as low as reasonably achievable;
- d) Setting goals and objectives and reviewing those on an annual basis;
- e) Complying with and, wherever possible, exceed regulatory requirements and standards;
- f) Ensuring that all staff are provided with adequate and appropriate aviation safety information and training, are competent in safety matters and are only allocated tasks commensurate with their skills;
- g) Establishing and measuring our safety performance against realistic objectives and/or targets;
- h) Maintaining a non-punitive reporting policy and encouraging all employees to report any hazards or safety concerns

A handwritten signature in black ink, appearing to read "Holly Johnson". The signature is fluid and cursive, written over a horizontal line.

Holly Johnson, President

CHAPTER 1

RESPONSIBILITY FOR THE SAFETY PROGRAM

This safety program applies to every employee while they are on duty. Employees at all levels are responsible for accident prevention and the implementation of this program.

1. President is responsible for:
 - a. The Safety Program
 - b. Annual review and revision of the Safety Policy and Emergency Response Plan
 - c. Measure effectiveness of the objectives of the Safety Policy
 - d. Provide resources for maintaining the Safety Program

2. Director of Operations is responsible for:
 - a. Ensuring that flight crews are qualified in accordance with applicable regulations (along with the Chief Pilot)
 - b. Working with operations personnel to ensure that each pilot meets company standards of experience, proficiency, and performance for each flight
 - c. Working with the Director of Tour Operations to ensure that the company standards on qualifications, experience, and performance for dock service and customer service personnel are maintained

3. Chief Pilot is responsible for:
 - a. Interviewing and screening flight crew candidates, and checking references
 - b. Evaluating, training, and qualifying (along with the Director of Operations and instructor pilots) flight crews in accordance with applicable regulations

4. Director of Maintenance is responsible for:
 - a. Ensuring that all maintenance is performed in a safe manner in accordance with applicable regulations and manufacturers' procedures
 - b. A safe working environment for mechanics

CHAPTER 1

RESPONSIBILITY FOR THE SAFETY PROGRAM

5. Safety Officer is responsible for:
 - a. The maintenance, review and revision of the Safety Program annually or as required
 - b. Providing timely advice and assistance on safety matters to managers at all levels
 - c. Maintaining a reporting system for accidents, incidents, occurrences and hazards
 - d. Distributing aviation safety information
 - e. Acting as chairperson and recorder at safety meetings
 - f. Providing initial and recurrent safety program training to new and current personnel
 - g. Maintaining a safety award program
 - h. Maintaining documentation as required
 - i. Advising the Safety Committee on ways to improve the Safety Program
 - j. Reporting to the President on the performance of the Safety Program as needed
 - k. Ensure that changes in the Safety Program conform with other company manuals and regulations
 - l. Maintaining the Emergency Response Plan (ERP)
 - m. Conducting ERP training exercises during the 1st, 2nd and 4th calendar quarter
 - n. Maintaining the emergency contact list as applicable

6. All other employees are responsible for:
 - a. Being familiar and complying with the company Safety Program
 - b. Reporting any and all accidents, incidents, occurrences and hazards they become aware of via the Company online reporting system.

CHAPTER 2

DUTIES OF MANAGEMENT AND EMPLOYEES UNDER THE SAFETY PROGRAM

1. President duties include but not limited to;
 - a. Overseeing the company Safety Program
 - b. Enforcement of company rules and procedures
 - c. Evaluate the Safety Officer's performance annually against the standards listed on the Safety Officer Evaluation form

2. Director of Operations duties include, but not limited to;
 - a. The teamwork, attitude and performance of all employees involved in air operations
 - b. Supervises the company training program for pilots
 - c. Works with the Director of Tour Operations to ensure that ramp, dock, and customer service employees receive training
 - d. Conducts proficiency and safety review of air operations employees when necessary, with the involvement of the Safety Officer
 - e. Takes disciplinary action on employees violating established company rules and procedures

3. Chief Pilot duties include but not limited to;
 - a. The teamwork, attitude and performance of pilots
 - b. Takes disciplinary action on pilots violating established company rules and procedures

4. Director of Maintenance duties include but not limited to;
 - a. The teamwork, attitude and performance of mechanics
 - b. Directs training for mechanics
 - c. Takes disciplinary action on employees violating established company rules and procedures
 - d. Assists or delegates employees to assist the Safety Officer in performing safety audits of maintenance facilities

CHAPTER 2

DUTIES OF MANAGEMENT AND EMPLOYEES UNDER THE SAFETY PROGRAM

5. Safety Officer duties include, but is not limited to:
 - a. Identifying hazards
 - b. Compile hazard reports
 - c. Performing safety audits
 - d. Monitoring and analyzing trends utilizing data analysis and reporting any trends to the Safety Committee
 - e. Developing the necessary forms and instructions for implementing the Safety Program
 - f. The reporting and investigation of any aviation safety-related event
 - g. Periodically backup the Safety Program and related documentation electronically
 - h. Annual review and revision of the Safety Program training.
 - i. Fall hazard training

6. Pilot duties include, but are not limited to:
 - a. Recognizing that safety awareness, teamwork, and attitude are of paramount importance at Wings Airways
 - b. Being alert for operational hazards while in flight, on the ground, or on the water
 - c. Reporting all hazards to flight, ground or water operations to the Director of Operations, Chief Pilot, Safety Officer, or Operations Personnel at the earliest opportunity
 - d. Submitting Hazard Reports or NASA forms, when appropriate
 - e. Being objective in assessing and evaluating the activities of the airport/Seadrome/remote operations, maintenance, ground service, dock service, operations, etc.
 - f. Reporting any observed departures from established procedures by themselves, company pilots, management or other pilots to the Director of Operations, the Chief Pilot, or the Safety Officer
 - g. Attending pilot meetings as scheduled

CHAPTER 2

DUTIES OF MANAGEMENT AND EMPLOYEES UNDER THE SAFETY PROGRAM

7. Mechanic duties include, but are not limited to:
 - a. Working in potentially hazardous locations with hazardous materials
 - b. Recognizing that shop safety, teamwork and attitude are of paramount importance at Wings Airways
 - c. Being alert for safety hazards at all times in and around company facilities
 - d. Familiarity of fire notification and evacuation procedures and the location of fire extinguishers
 - e. Reporting all known maintenance hazards to the Director of Maintenance
 - f. Using the appropriate maintenance and repair manuals for all maintenance operations, and report departures from established maintenance procedures to the Director of Maintenance

8. All other employee duties include, but are not limited to:
 - a. Perform job classification as trained
 - b. Continuously monitor work environment for unsafe conditions

CHAPTER 3

ACCIDENT PREVENTION PROGRAM

1. Wings Airways management fosters good employee attitudes and teamwork through daily direction of company activities. Maintaining good employee teamwork and attitudes at Wings Airways can ensure that a hazard with the potential for an accident is resolved at the lowest level of the company. A hazard that cannot be resolved at a lower level will be forwarded to management personnel for resolution. Management and the Safety Officer will resolve hazards identified through the hazard reporting system.
2. The Accident Prevention Program also includes Safety Awards, the distribution of safety information, bulletin boards, safety meetings, reading files, safety education and training including fall prevention, hazard reports, safety audits/inspections, and corresponding documentation.

CHAPTER 4

ACCIDENT/INCIDENT INVESTIGATION PROGRAM

1. In the case of an aircraft accident, Wings Airways will cooperate with all applicable authorities.
2. Wings Airways will conduct a separate, internal investigation to determine the cause of every accident or incident. Definitions of accidents and incidents are listed on page 4-2. Information on the causes and recommendations of accidents and incidents are not for public release. Management will use this information to enhance the Safety Program, as well as the entire operation. Action will be taken to ensure that the causes of the accident or incident are not repeated.
3. Wings Airways employees and managers will not discuss any accident or incident with anyone outside of the company. Wings Airways will always comply with the requirements of law and regulation and seek to determine the cause of any accident or incident, however, the rights of the individuals involved and the company must also be protected. A considerable amount of time is required to complete an investigation, so employees should avoid speculating on the causes of an accident or incident until conclusions are reached. In addition, the Director of Finance will provide initial information to the company insurance carrier and the State of Alaska, as required under the Alaska Workers Compensation Act.
4. An insurance adjuster's investigation may also proceed concurrent to the accident or incident investigation. Damage claims will require the services of an adjuster. If there is any injury to a passenger(s), there will be a liability adjuster assigned. Finally, if there is an injury to a Wings Airways employee, there will be an investigation conducted by a State of Alaska Workers Compensation Adjuster. Wings Airways employees should obtain permission from their supervisor, manager or the company president before providing any information to an investigating official.

CHAPTER 4

ACCIDENT/INCIDENT INVESTIGATION PROGRAM

Definitions of accidents and incidents:

1. **ACCIDENTS.** All accidental damage to Wings Airways aircraft, docks, vehicles, boat; injury to Wings Airways personnel or customers resulting from aircraft operation; and damage to non-Wings Airways property or injury to other personnel resulting from Wings Airways operations all qualify as accidents and will be immediately reported to company Operations. Operations personnel will notify the appropriate company Managers in accordance with the Emergency Response Plan.
2. **INCIDENTS.** The following incidents (but not limited to) will be reported to the company Safety Officer as soon as possible:
 - a. Any system failure or abnormal operation of a system
 - b. Loss of any external part from an aircraft
 - c. Waterway/lane incursion
 - d. Fuel leak or spill
 - e. Fire, explosion, smoke or toxic fumes
 - f. Significant fueling error
 - g. Unsecured load
 - h. Damage to non-company property
 - i. Inadequate or failed ground facilities creating a hazardous situation
 - j. Bird strike
 - k. Near mid-air collision
 - l. Unlawful interference
 - m. Violent or disruptive passengers
3. **OCCURRENCES.** An occurrence is an event that does not directly affect the safety of the flight or operations, or qualify as an incident. However, it may be considered not normal or usual practice, and should be brought to the attention of the Company. Such event will be documented accordingly.

CHAPTER 5

SAFETY AUDITS AND INSPECTIONS

1. Wings Airways will maintain an aviation safety audit program to verify compliance with safety standards and determine the effectiveness of the safety program.
2. All facilities will receive a safety audit annually. The Safety Officer, using other employees as appropriate, will conduct the audits. The Safety Officer will maintain and use either the Maintenance Facility Evaluation checklist or the Seadrome Evaluation checklist, whichever is appropriate, during the audits. These inspections will be conducted to ensure that Wings Airways is, at a minimum, meeting the requirements of the laws and regulations unique to the aviation industry.
3. When an external audit is completed the Safety Committee will review the findings of that audit.
4. Anytime when new procedures or equipment are to be utilized the Safety Officer will conduct a risk assessment to ensure all risks have been either mitigated or minimized.
5. Audit of Safety Program Training Records, to insure all employees have been trained, will be accomplished annually.

CHAPTER 6

SAFETY OFFICER QUALIFICATIONS

The Safety Officer will meet the job description listed in the General Operations Manual (GOM) under Chapter 1, page 1-5 (d) in addition to the following:

1. Training. Participation in industry safety meetings, conferences or schools is considered an essential part of the continuing education of the Safety Officer. Annual training should include the following subject areas but not limited to:
 - a. Corporate safety culture
 - b. Safety culture
 - c. Safety data collection and analysis programs
 - d. Risk management
 - e. Incident/accident prevention and investigation
 - f. Human Factors
2. Experience. Should have extensive operational experience and professional qualifications in aviation. This would include the knowledge and understanding of the following:
 - a. Aviation safety programs
 - b. Aviation safety standards
 - c. Safe aviation operating practices
3. Expertise. Should have established professional qualification. These qualifications may be any of the following:
 - a. A FAA commercial pilot or Airline Transport Pilot certificate
 - b. A FAA mechanics certificate
 - c. Three years' experience in a supervisory position with a FAR part 135 carrier
4. Knowledge. Should have a full understanding of the following materials:
 - a. Wings Airways' FAA Operations Specifications
 - b. Wings Airways' General Operations Manual
 - c. All appropriate maintenance and airworthiness requirements of 14 CFR chapter I (parts 1-199)

CHAPTER 7

INDIVIDUAL SAFETY AWARD

1. The \$100 individual award is given to those who contribute significantly to the safety program. The contribution may be a single act that prevented damage or injury or it may be in the form of an investigation, hazard resolution, or anything that significantly enhances the Safety Program. The single act does not have to be carried out while on duty.
2. Any employee can initiate a nomination. To do so, they should submit their nomination via the Nomination for Employee Safety Award form. This form can be found on the employee website (mywingsairways.com).
3. The nomination will be forwarded to the management team for final review.

CHAPTER 8

SAFETY COMMITTEE AND MEETINGS

1. The safety committee is chaired by the Safety Officer and department management personnel. The Safety Officer will email a list of current hazards to members of the committee monthly or as needed. Standard items in the email will include, but limited to: past hazard reports, new hazard reports, awards and other items of interest. If needed the committee will meet in person to discuss specific topics. The Safety Officer will act as recorder of the meetings. Minutes taken at the safety committee meetings will be published and distributed via read files and the employee only web site. Minutes will also be retained electronically by the Safety Officer.
2. The committee may approve, reject or recommend action on any matter brought before it. Committee recommendation(s) will be forwarded immediately to the appropriate manager in writing. The Safety Officer will conduct a follow up meeting with the appropriate manager after the recommendation(s) have been sent to ensure the recommendations were effective.
3. Employee meetings will be conducted on a regular basis and notes of those meetings will be published and distributed via read files and the employee only website. Minutes will also be retained electronically by the Safety Officer.

CHAPTER 9

HAZARD REPORTING

Sharing safety information is the cornerstone of an effective safety program. Wings Airways utilizes a hazard reporting system for both ground and flight operations. This is accomplished by submitting Hazard Reports via the employee only website (www.mywingsairways.com).

1. Wings Airways maintains an anonymous and non-punitive reporting policy.
 - a. Employees observing a hazard are not only encouraged but feel obligated to report it. In addition, Wings Airways' employees have the best insight as to how to correct hazards found in the workplace. Management strongly encourages employees to submit their suggested corrective actions with their Hazard Reports.
 - b. No disciplinary or punitive action by Wings Airways' management will be taken against an employee who reports safety information. Employees should feel free to communicate safety information to either their supervisor or the Safety Officer without fear of retribution.
 - i. This policy does not cover:
 1. Negligent actions
 2. Intentional disregard for safety
 3. Criminal conduct
 4. Substance or alcohol abuse
2. How to submit a Hazard Report:
 - a. Website address is www.mywingsairways.com. Click on "safety".
 - b. Username is *lodge* and the password is *taku*. (lower case)
 - c. Click on "Hazard Report".
 - d. Employees are required to submit a date, location, a narrative of the hazard. It is strongly encouraged that employees list as much information as they can to aid in trending data. To remain "anonymous" leave the name cell blank.
3. How the Hazard Report is dealt with after its submission.
 - a. The Safety Officer will contact the submitter either by email or personally within three working days, provided the report was not anonymous.
 - b. The Safety Officer will analyze the report. With the assistance of the Safety Committee, as needed, the Safety Officer will assess the risk level of the reported hazard. Hazards with a "high" value will be dealt with immediately. Hazards with a "medium" or "low" value will be dealt with as appropriate.
 - c. A corrective action, along with the individual who is accountable for the corrective action, will be created for the submitted hazard.
 - d. A risk level determination will be made if an acceptable "short term" corrective action is put in place while a permanent corrective action can be developed.
 - e. The corrective action will be analyzed for any secondary hazards.
 - f. After the implementation of the corrective action, the Safety Officer will verify the effectiveness of the corrective action.
 - g. After the corrective action has been verified, the Safety Officer will validate the corrective action.
 - h. The Safety Officer will print a hard copy of the report and file indefinitely.

CHAPTER 9

HAZARD REPORTING

4. Reporting Incentives
 - a. Once a month (May through September) a \$50 cash award will be given away to a randomly chosen employee who has submitted a Hazard Report. Each report submitted will be eligible for the award, therefore, the more reports submitted by an individual the better chance of winning the award. Reports submitted during the period from October through April will be included to the following operating season.
 - b. At the end of September, a drawing for \$250 will be held. To be eligible for the drawing, an employee need only submit one hazard report during the year (October through September). Unlike the monthly award, the employee name only goes into the drawing once per year, no matter how many hazard reports they submit.
5. Feedback

Feedback from Hazard Reports, initiatives, responses and any other safety issue can be in several forms to include, but not limited to, email alerts, phone calls, bulletin boards, company mail or in person.
6. NASA (ASRS) Forms

The Aviation Safety Reporting System (ASRS) is a program administered by the National Aeronautics and Space Administration (NASA). The FAA as a basis for adverse action may not use these reports. Timely submission of the ASRS report will sometimes prevent an adverse action by the FAA if the event independently comes to the attention of the FAA. The program is covered in the Aeronautical Information Manual and FAA Advisory Circular 00-46E. The ASRS forms can be downloaded from the following Internet address: <http://asrs.arc.nasa.gov/report/electronic.html>. All pilots are encouraged to review and utilized this system. The Safety Officer will assist those interested in using the ASRS.

CHAPTER 10

SAFETY PROGRAM TRAINING CURRICULUM

Objective: The Safety Officer, or his designee, will provide training to all employees on the Safety Program's policies and procedures. This training may either be incorporated into existing indoctrination programs or given separately by the Safety Officer.

Prerequisites: Employee of Wings Airways, LLC.

- Elements:**
1. Responsibilities and Duties
 2. Workman's Compensation
 - a. Fall hazard training
 3. Hazards and Risks
 - a. Definitions
 4. Hazard reporting
 - a. Employee website
 - b. How to compile a report
 - c. Non-punitive policy
 - d. Anonymous reporting
 - e. Feedback
 5. Safety Awards/Incentives
 - a. Individual Safety Award
 - b. Monthly reporting incentive
 6. Safety Committee
 7. Emergency Response Plan (ERP)

Courseware: PowerPoint presentation, test, training certificate

Training

Time: Variable

Completion Standards: A trainee has completed this curriculum when all required training times have been met, all tests corrected to 100% and the proper entries made in the training records.

The Safety Officer will maintain records reflecting dates, names and subjects covered by using the Safety Program Training Certificate and keeping the completed certificates in the safety training file located at the Safety Officer's office.

CHAPTER 11

REVISION AND REVIEW

1. The Safety Officer has the authority to make changes to the Safety Program. All employees are encouraged to submit any constructive suggestions that will improve the effectiveness of any of the procedures, policies or processes outlined in this manual. Suggestions can be submitted online utilizing the Employee Feedback Form.
 - a. Revisions to the Safety Program manual will be made and inserted in each manual by the Safety Officer or his designee.
 - b. The Safety Officer shall insure that all employees are made aware of and familiar with each revision. This will be accomplished by utilizing several resources to include, but not limited to, email alerts, phone calls, bulletin boards, training, company mail or in person.
 - c. A list of effective pages will be included in each manual. This list will show revisions by number and the date the revision was effective.
 - d. Each page of the manual will show, in the upper right corner, the revision, the page number and the revision date. No revision number or date indicates an original page. A vertical line in the right margin will indicate each revised paragraph.
 - e. Within four weeks of a revision the Safety Officer will use the Effectiveness and Impacts of Procedural Change form to determine the effectiveness of the revision.

2. If, through the Safety Program, a change in another department's manuals is indicated, the Safety Officer will:
 - a) Notify the head of that department
 - b) Indicate what the issue is
 - c) Provide a corrective action to resolve the issue

CHAPTER 12

EMERGENCY REPSONSE PLAN

1. The Emergency Response Plan (ERP) will be exercised as outlined on page 1-2, item 5 (m).
 - a. The following is a list of current prepackaged ERP scenarios
 - i. Accidents involving aircraft
 - ii. Ground emergencies NOT involving aircraft
 - iii. Forced landing
 - iv. Precautionary landing
 - v. Missing or overdue aircraft
 - vi. Taku Lodge emergency
 - b. The exercise will consist of any possible scenario conceived
 - c. The Safety Officer will oversee the ERP exercise and whenever possible all management personnel will be available to participate

2. Management will review and update the ERP as needed.