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Management System Policy

| MS.F | OL. | 001 |
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| Edition | : | 2.0 |
|--------------|---|-------------|
| Edition Date | : | 01.11.2021. |
| Status | : | In use |

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На основу члана 35. став 1. тачка 8) Уговора о потврђивању континуитета пружања услуга у ваздушној пловидби у просторима Србије и Црне Горе / Уговора о потврђивању континуитета пружања ваздухопловних услуга у вазлушним просторима Црне Горе и Србије (II Ов. бр. 2164/2012 од 25.04.2012. године ОУ.СД број 282/2 од 25.04.2012. године), Надзорни одбор је на предлог Директора SMATSA доо, на селници одржаној дана 08.10.2021. године, донео

одлуку

- Усваја се документ MS.POL.001 Политика менацмент система, у предложеном тексту (на српском и снглеском језику), верзија 2.0 од 01.11.2021. године, који чини саставни део одлуке.
- 2. Овлашћује се Директор SMATSA доо да потпише документ из тач. 1 ове одлуке.
- 3. Документ из тач. 1. ове одлуке ступа на снагу 01.11.2021. године.
- 4. Усвајањем и доношењем овог документа, престаје да важи MS.POL.001 Политика менацмент система, верзија 1.0 од 30.10.2020. године

ПРЕДСЕДНИК НАДЗОРНОГ ОДБОРА





Pursuant to Art. 47 of the Agreement on confirmation of continuity of the air navigation service provision in the airspaces of Serbia and Montenegro (II Ov. No. 2164/2012 of 25 April 2012 - OU.SD No. 282/2 of 25 April 2012) and Desicion of the Supervisory Board No. OU/NO-513/3 of 08.10.2021. I hereby enact

Management System Policy

Management System Policy shall enter into force on 01.11.2021.

и Црне Director A Predrag Jovanovic

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DOCUMENT CHANGE RECORD

| Edition | Edition Date | Reason for change |
|---------|--------------|---|
| 1.0 | 30.10.2020. | Integration of Safety Policy, Just Culture Policy, Quality Policy, Security Policy and Environmental and Sustainable Development Policy, as well as Occupational Health and Safety and Risk Management principles into one document; harmonisation with Regulations (EU) 2017/373 and 2015/340 requirements |
| 2.0 | 01.11.2021. | Changes in accordance with changes to organisation of SMATSA IIc (termination of ATO, FSTD and MO domains). Referencing on the requirements of Regulation (EU) 2015/340. |

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1 Introduction

SMATSA IIc operates as provider of ATM/ANS services and functions, as an ANS personnel training organisation, as flight inspection and calibration service provider, as well as continuing airworthiness organisation. As such, it has established and maintaines management system which includes safety (SMS), quality (QMS), compliance monitoring (CM), security (SeMS), occupational health and safety (OHS), environment (EMS) and risk management (RMS).

This document provides a description of the overall philosophies and principles with regard to safety, just culture, quality, security, health and safety, environment and risk, collectively constituting a management system policy.

Management System Policy complies with the following standards and regulatory requirements:

- ISO 9001:2015 Quality management systems Requirements;
- ISO 14001:2015 Environmental management systems Requirements with guidance for use;
- ISO 19600:2014 Compliance management systems Guidelines;
- ISO 31000:2019 Risk management Guidelines;
- Regulation on the conditions to be fulfilled by air navigation service providers (which transposes regulation (EU) 2017/373 in Serbia) (ATM/ANS.OR.B.005 under (a)(2), AMC1 ATM/ANS.OR.B.005(a)(2) and AMC1 ATS.OR.200(1)(i));
- Regulation laying down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight (which transposes regulation (EU) 2017/373 in Montenegro) (ATM/ANS.OR.B.005 under (a)(2), AMC1 ATM/ANS.OR.B.005(a)(2) and AMC1 ATS.OR.200(1)(i));
- Regulation on air traffic controller`s licences, training organisations and aeromedical centres, with associated amendments (which transposes regulation (EU) 2015/340 in Serbia) (ATCO.OR.C.001 under (b));
- Regulation on air traffic controller's licences and training organisations (which transposes regulation (EU) 2015/340 in Montenegro) (ATCO.OR.C.001 under (b));

2 Management System Policy (AMC1 ATM/ANS.OR.B.005(a)(2), AMC1 ATS.OR.200(1)(i), ATCO.OR.C.001 under (b), AMC1 ATCO.OR.C.001(b))

2.1 Commitment

SMATSA IIc is committed to achieving the highest level of safety, quality and security when providing its services and functions in an efficient, continuous and sustainable manner, openly and transparently, without discriminating against users based on nationality or other characteristics or class of users of its services and functions. To this end, a proactive and systematic management system is maintained, as well as adequate technical and operational capacities and expertise of employees. (ATM/ANS.OR.A.075, ATM/ANS.OR.B.001)

By adopting this document, senior management of SMATSA llc clearly expresses its commitment to the implementation, maintenance and continuous development of the management system.

The overall safety objective of SMATSA IIc is to reduce its impact in an occurrence, serious incident or accident to a minimum (AMC1 ATS.OR.200(1)(i) under (b)(3)).

In providing all services, SMATSA IIc is committed to the prevention of pollution, preservation and protection of the environment, as well as maintaining and improving a healthy and safe working environment and occupational health and safety of employees.

SMATSA IIc is committed to a structured and comprehensive approach to management, by integrating the risk management process into all activities of the organisation. This includes the identification of hazards and threats, risk assessment, as well as the definition and implementation of risk mitigation measures to an acceptable level. An adequate, customised and dynamic risk management process is maintained and improved, which contributes to efficient decision-making and management of the organisation in order to achieve the set business goals.

The commitment of SMATSA llc is reflected through:

- improving towards the highest performance standards so as to support the achievement of the highest level of safety;
- compliance with all applicable legislation and other requirements, meeting applicable standards and considering best practice examples;
- enforcing safety as one primary responsibility of all managers and employees;
- meeting customer requirements, understanding and exceeding their expectations, relying on the principles of corporate social responsibility;
- continuous improvement of the effectiveness and efficiency of the management system, sustainable management, evaluation of performance / indicators and (where applicable) monitoring of the life cycle of products and services;
- providing appropriate conditions and means, human and financial resources for the undisturbed functioning and constant improvement of the management system and implementation of this Policy;
- ensuring the highest standards of recruitment and selection of employees, which are assigned in accordance with their knowledge, abilities and skills, as well as raising awareness and their continuous training;
- the primary responsibility of all managers to ensure the conditions for the provision of services and functions in such a way as to enable the achievement of the highest level of safety in the airspace where the service is provided;
- regular review and revision of actions, instructions and procedures within the management system, in order to improve and continually comply with regulations;
- development and verification of contingency plans in order to minimise the consequences and ensure the fastest return to the normal functioning of the system;
- the principle that the purpose of reporting is improvement and not to apportion blame to individuals;
- managing business processes and controlling all aspects that may have an impact on climate change, noise levels, air, water and soil quality and preserving the natural characteristics of the environment;
- implementing CISM (Critical Incident Stress Management) and providing professional assistance to employees after a stressful situation.

The implementation, maintenance and continuous improvement of the effectiveness of the management system enables full control, monitoring and permanent improvement of the effectiveness and efficiency of all business processes.

2.2 Reporting principles

SMATSA IIc internal documents define reporting principles, which include horizontal and vertical communication and reporting lines. In addition, reporting is performed to the relevant bodies and institutions of the founding states, to international professional organisations and associations, as well as to the banks, in accordance with the requirements of regulations or the provisions of the contracts.

Mandatory and voluntary reporting of occurrences and their analysis is established and encouraged, as well as making suggestions for improving safety, which ensures the exchange of information and experiences with all stakeholders. The purpose of reporting and investigating occurrences is to improve safety, not to apportion blame to individuals.

Occurrence reporting is defined by the procedure SAF.PROC.007 - Occurrence reporting, collecting data and making suggestions for improving security.

Reporting on the performance of business processes and their compliance with the requirements for the provision of services and functions is performed within the quality management system and the compliance monitoring function.

A system of mandatory and voluntary reporting of security incidents, violations of prescribed norms and irregularities, as well as giving proposals for improvement of security, is established and improved.

Employees are motivated to submit voluntary reports, which are not covered by mandatory reporting, and which have or may have an impact on security and which are used exclusively to improve the security system.

Procedures for reporting unsafe situations and injuries at work, as well as emergencies with an impact on the environment, are being established in order to analyse them, identify root cause and respond adequately.

As part of the risk management process, a timely communication and consultation process has been established to exchange information on identified risks and opportunities, as well as on measures to mitigate them.

2.3 Roles and responsibilities

Senior management ensures that the Management System Policy is appropriate to the purpose and needs of SMATSA IIc, that provides a framework for establishing and reviewing objectives in relation to the provision of the services and functions and that through the work of the Management Systems Committee, it is periodically reviewed for countinuing suitability.

In addition, senior management continually promotes the Management System Policy to all personnel and demonstrates their commitment to it, provides necessary and appropriate means, human and financial resources for its implementation. Through quality objectives, senior management establish safety and objectives in relation to the provision of the services and functions as well as performance standards.

By publishing on the website, the SMATSA IIc Management System Policy is available to all employees of SMATSA IIc, direct and indirect service users, regulatory bodies, the local community and other interested parties.

Management Systems Director performs the function of Safety, Quality, Compliance Monitoring and Security Manager who has ultimate responsibility and accountability for the implementation and maintenance of the Management System (AMC1 ATS.OR.200(1)(ii);(iii) under (a), ATCO.OR.C.001 under (f)). Managers of organisational units are responsible to ensure the implementation of measures, instructions and procedures of the management system within their jurisdiction.

All employees are obliged to respect and act in accordance with the documents of the management system and to contribute to the improvement of the system with their activities (reports and suggestions).

Legal and natural persons who provide services, deliver goods or perform works for SMATSA llc are obliged to respect and act in accordance with the appropriate standards and requirements of SMATSA llc's management system.

2.4 Just Culture

For the efficient operation of the safety management system, a Just Culture has been established, which encourages and motivates employees to submit important information that may have an impact on safety, while establishing a clearly defined boundary between acceptable and unacceptable operational behavior / actions. In this way, fair protection of reporting employees is ensured.

Just culture creates an environment in which intimidation and flat-out blaming of individuals is not allowed. However, determining the responsibility of employees (misdemeanor or criminal) is not excluded, in accordance with the legal system of the founding states, especially in case of accidents or serious incidents resulting in lives lost or property damaged, even if no negligence or ill intent existed.

An atmosphere in which "everything is forgiven and allowed" is neither desirable nor possible. However, if the act was committed without premeditation and intent and reported by the employee, the employee can expect full legal and other support from SMATSA llc in case of investigation, disciplinary or court proceedings.

Procedures that can in no way be tolerated (unacceptable behavior / actions) are:

- gross conscious violations of prescribed rules, procedures and actions;
- conscious forcing of unsafe actions where the consequences of the action are obviously negative;
- leaving the workplace on their own initiative;
- performing activities that are not within the job description, but distract attention and concentration of employees;
- consuming and coming to work under the influence of prohibited drugs and substances (alcohol, psychoactive substances, ...);
- sabotage, terrorist acts and other acts of unlawful interference aimed at the provision of services.

Disciplinary measures would not be applied to unintentional actions, such as: slips, omissions, oversight, etc.

3 Definitions

| Air Traffic Management | Aggregation of the airborne and ground-based functions (air traffic services, airspace management and air traffic flow management) required to ensure the safe and efficient movement of aircraft during all phases of operations. |
|-------------------------|--|
| Air Navigation Services | Term that includes air traffic services; communication, navigation and surveillance services; meteorological services for air navigation; and aeronautical information services. |

| Organisation | Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives. |
|---|---|
| Management System | Set of interrelated or interacting elements of an organisation to establish policies and objectives, and processes to achieve those objectives. |
| Safety | Condition in which the risk of endangering human life and health and causing damage to property is reduced and maintained at an acceptable level, by constant detection of hazards and control of the risk of perceived hazards. (<i>Air Transport Law of the Republic of Serbia</i>) |
| | Taking preventive measures, actions and procedures for the purpose of preventing accidents and serious incidents of aircraft or reducing their consequences. (<i>Air Transport Law of Montenegro</i>) |
| Safety Management System (SMS) | Systematic approach to managing safety, including the necessary organisational structures, accountabilities, policies, and procedures. |
| Quality | Degree to which a set of inherent characteristics of an object fulfils requirements. |
| Quality Policy | Intentions and direction of an organisation as formally expressed by its top management related to quality. |
| Quality Management System (QMS) | Part of a management system with regard to quality. |
| Aviation Security | A set of measures and human and material potentials that secures aviation from acts of unlawful interference. |
| Security Management System (SeMS) | Part of the management system that defines the manner of security management in the organisation, which includes policy, systems and procedures that protect the organization from threats or respond to those threats. |
| Environment | Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships. |
| Environmental management system (EMS) | Part of the management system used to manage environmental aspects, fulfil compliance obligations and address risks and opportunities. |
| Environmental policy | Intentions and direction of an organisation related to environmental performance as formally expressed by its top management. |
| Occupational health and safety (OHS) | Provision of such working conditions which, as far as possible, reduce injuries at work, occupational and work-related illnesses and which predominantly create a precondition for the full physical, mental and social well-being of employees. |
| Occupational health and safety policy | Policy to prevent work-related injury and ill health to workers and to provide safe and healthy workplaces. |
| Risk | Effect of uncertainty on objectives. (ISO 31000:2015) |
| | Combination of the overall probability or frequency of occurrence of a harmful effect induced by a hazard and the severity of that effect |
| Risk management | Coordinated activities to direct and control an organisation with regard to risk. |
| Risk Management Policy | Statement of the overall intentions and direction of an organisation related to risk management. |
| | |

4 Acronyms and abbreviations

CM Compliance Monitoring
EMS Environment Management System
OHS Occupational Health and Safety
QMS Quality Management System
RMS Risk Management System
SeMS Security Management System
SMS Safety Management System