



## JUST CULTURE POLICY

In my capacity as accountable manager of CLIPPER NATIONAL AIR I consider that the Operational Safety Culture is a part of the organizational culture, and therefore I have a firm intention to establish an open and honest reporting policy in which all personnel, regardless of their position or functions, are treated in a fair, consistent, objective and timely manner.

To this end, I commit and involve all Officers to:

1. Comply with safety requirements in all aspects of **CLIPPER NATIONAL AIR's** business. To this end, safety events must be managed systematically and actively, balancing potentially conflicting safety and production requirements within a fair culture that encourages open and honest reporting of safety events.
2. Recognize that making mistakes is part of the human condition, and that human factors play an important role in aviation and operational safety.
3. Encourage all personnel to actively contribute to the improvement of operational safety by reporting errors made or detected, as well as reporting actual or potential events and hazards they perceive.
4. By virtue of this just culture, **CLIPPER NATIONAL AIR** will follow a defined and consistent methodology to manage errors, which will be analyzed focusing on the organization's errors and not on the individual, in order to take the best actions we consider according to the case.
5. All incidents will be investigated and when reported in a timely and open manner, the presumption of innocence will be the norm and the expectation that disciplinary action will be the exception. If any disciplinary or administrative action is required, it will not be without a proper investigation and a full review of the findings of that investigation.
6. However, the following behaviors will be sanctioned:
  - Dolo, meaning premeditated or intentional acts that cause damage to equipment or property.
  - Serious negligence, meaning when there has been a manifest, significant and serious omission of the duty of care in the face of an obvious risk and a serious professional failure to provide the diligence that is obviously required in these circumstances, resulting in foreseeable damage to persons or property or seriously compromising the level of aviation safety.
7. All **CLIPPER NATIONAL AIR** personnel, wherever they work and whatever their function, must be aware that they have a role to play and a responsibility to actively participate in achieving the highest flight safety standards.
8. The Just Culture, and the occurrence reporting system, will enable **CLIPPER NATIONAL AIR** to efficiently meet operational requirements while ensuring safety standards. The system will help reduce errors while recognizing that people make mistakes and the just culture will make it possible to meet this objective.