SK TRAVEL LLC
FLIGHT OPERATIONS MANUAL

SK Travel LLC
[redacted]
New Castle, DE 19720

PREAMBLE

This SK Travel LLC Flight Operations Manual has been compiled for the use and guidance of Flight Department personnel in the execution of your duties. It contains information and instructions on the manner in which company flight operations shall be conducted.

SK Travel LLC recognizes that passengers have "Freedom of Choice" when selecting their mode of transportation, including company aircraft or commercial airlines. To that end, SK Travel LLC is dedicated to highly professional flight operations. Safety will always be our first priority and we will be persistent in continuously demonstrating high safety consciousness in our daily flight operations.

The mission of the SK Travel LLC Aviation Department is to provide safe and efficient air transportation service to owners, employees and guests who work directly in assisting the company to meet its business objectives.

You, as the SK Travel LLC operational and technical staff, will always have my full support as long as you operate professionally in accordance with this SK Travel LLC Flight Operations Manual. I also wish to make it understood that all staff has a duty to openly and honestly report events and hazards. You can be assured that such reports will be thoroughly investigated in a non-punitive manner.

SK Travel LLC recognizes the value of operating to a well-recognized international standard. The SK Travel LLC Flight Operations Manual has been developed to satisfy the International Standards for Business Aircraft Operations (IS-BAO). The Manual also incorporates specific requirements of FAA regulations and the ICAO requirements for international operations.

These standards were developed using "best practices" used widely in the business aviation community and, as such, reflect the highest standards of operational safety that we wish to achieve in this company. It is my goal as CEO of this company to achieve these high standards and to continuously strive to exceed them.

All operations and maintenance personnel should read and comply with the policy and procedures of this Manual. Changes to the Manual will be promptly issued to all Flight Department personnel.

I am appointing the Chief Pilot / Director of Maintenance with the authority and responsibility for the safe and efficient conduct of flight operations and for keeping the SK Travel LLC Flight Operations Manual current.

Emil Solimine, CEO

Lewis Katz, CEO

SK Travel LLC

SECTION 2

SAFETY MANAGEMENT SYSTEM

2.1.0 SMS STRATEGY AND POLICY

2.1.1 Overview

A. A Safety Management System (SMS) is a structured process for managing safety and safety is actually about managing risk.

B. An SMS is a systematic approach to managing safety risks, including the necessary organizational structures, accountabilities, policies, and procedures.

C. The key components and elements are integrated into the routine business of SK Travel LLC. The SK Travel LLC SMS includes the components and elements described in this section.

D. SK Travel LLC uses a Safety Management System to ensure that the Flight Department consistently provides safe air transportation for its passengers and flightcrew.

2.1.2 Safety Culture

A. An active safety culture is vital to the continuing success of an SMS. It gives the dynamic energy needed to ensure that the system will provide a continuous cycle of improvement. This is developed by leadership, commitment, and setting a good example.

B. Accountable managers should take a leading role in developing an active safety culture within the organization, so that SMS becomes an integral part of the management and work practices of the organization.

C. Senior management commitment is crucial and this needs to be demonstrated on a regular basis.

D. Attitudes that constantly emphasize the importance of safety are demonstrated, developed and encouraged. Behaviors that undermine this approach will not be tolerated.

2.1.3 SMS Components and Elements

The components and elements of the SK Travel LLC Safety Management System form a continuous cycle of improvement, as illustrated in Figure 1, Risk Mitigation Process and Figure 2, SMS Flow Chart.

A. Safety Policy and Objectives

- Management commitment and responsibility;
- Safety Accountabilities;
- Appointment of key safety personnel;
- Coordination of Emergency Response Planning;
- SMS documentation.

B. Safety Risk Management

- Safety risk assessment and mitigation;
- Hazard identification.

Reactive - Collating information from unsafe conditions, error reports, accident and incident reports, and ensuring that the NTSB requirements are met.

Proactive - An initial hazard identification process; a safety reporting process; and safety assessments conducted at regular intervals, and whenever changes are planned.

Predictive - Reviewing data collected over a period of time; this data is evaluated for effectiveness of measures taken to mitigate the risk at the time the report was processed; underlying circumstances are uncovered; and a trend analysis is conducted.

C. Safety Assurance

- Safety performance monitoring and measurement;
- The management of change;
- Continuous improvement of the SMS.

D. Safety Promotion

- Training and education;
- Safety communication.

2.1.4 Safety Management Strategy

A. The SK Travel LLC Safety Management Strategy is a company culture that involves all employees at all times, whether at work or at home. This proactive and effective strategy is also designed to be one of non-attribution – that is, employees will not be penalized or blamed for recognition and submission of potential safety hazards.

B. The key features of the SK Travel LLC Safety Management Strategy are:

- Safe and efficient flight operations as described in this manual and other related technical documentation;
- Highly trained and professional Flight Department employees;
- Measured Safety Performance Goals;
- Processes to monitor Flight Department performance against short and long-range safety goals;
- An SK Travel LLC Safety Risk Profile which documents risk analyses;
- Hazard / risk tracking and the management strategies to continually mitigate risk;
- Corporate tools and resources to effectively manage risk; and
- Processes to monitor the effectiveness of the Safety Management System.

2.1.5 Strategic Safety Goal

The strategic safety goal of the SK Travel LLC Safety Management System is to reduce Safety Risks to as low a level as reasonably practicable. In order to achieve this strategic goal, the SK Travel LLC Safety Management System is proactive, ongoing, and fully integrated throughout the Flight Department and all of its activities, so as to be predictive in assessing potential risks.

2.1.5.1 Safety Performance Goals

A. As a result of the implementation of the Safety Management System, SK Travel LLC has selected a Safety Performance Goal.

B. The Safety Performance Goal will be measured by the Safety Officer and discussed at the annual Safety Meeting. The Safety Officer will set sub-goals and timelines that will focus on the Safety Performance Goal. Progress and effectiveness of the relevant actions and procedural changes necessary to reach the goal(s) will be monitored.

Note: Minutes of the Safety Meeting will be reviewed by the Chief Pilot / Director of Maintenance, in collaboration with the Safety Officer, to ensure sub goals are being targeted and agreed-upon action is effective.

2.1.6 Safety Policy

A. The SK Travel LLC safety policy reflects the organizational commitments regarding safety. SK Travel LLC has a clear statement to providing the necessary resources for the implementation of the safety policy. The Safety Policy is communicated, with visible endorsement, throughout the organization.

B. The safety policy includes the safety reporting procedures described in this section.

C. The safety policy shall be periodically reviewed to ensure it remains relevant and appropriate to the organization. This review is conducted at the annual Safety Meeting.

D. The following policy initiatives shall be implemented:

- All Flight Department employees and users will be involved in the SK Travel LLC Safety Management System;
- All employees will comply with applicable laws and regulations;
- Employee awareness, compliance, inspection, investigation and education / training programs will be incorporated into all aspects of the Flight Department;

  Note: All Flight Department personnel have received SMS initial and recurrent training.
- All employees will attempt to identify, report and eliminate hazardous conditions;
- All reported hazardous events will be investigated to determine the underlying circumstances, and efforts will be made to resolve the issue or mitigate the risk;

- All proposed new equipment acquisitions, facilities, operations and procedures will be reviewed with safety in mind;
- A Safety Risk Profile will be conducted for all anticipated change affecting the Flight Department;
- Management will actively seek recommendations from employees on improving safety activities through the SMS;
- The SMS will be evaluated annually for effectiveness; and
- Timely feedback will be provided to employees on submitted Incident / Hazard Reports.

2.1.7 Safety Meetings

A. Safety Meetings will be held on a quarterly basis. Representatives from each area of operations will attend meetings either through a physical presence at the meeting or by teleconference.

B. Safety Meeting minutes will be recorded, archived (Safety Binder), and made available to all Flight Department personnel.

C. Safety Meetings will address all pertinent safety issues, the effectiveness of noted mitigation strategies of all submitted Incident / Hazard Report Forms, and any other safety related concerns.

D. One quarterly meeting will be designated as the annual Safety Meeting. In addition to the above items, submitted forms will be analyzed for underlying circumstances, relationships, and trends.

2.1.7.1 Safety Binder

The SK Travel LLC Safety Binder is located in the Flight Department Office and is available for all employees. Information contained in the Safety Binder is also emailed and retained electronically on each employee's computer desktop. The binder contains:

- Minutes from the Safety Meetings;
- Read and Initial documents;
- Completed and closed Incident / Hazard Report Forms;
- Completed Deviation Report Forms;
- Completed SK Travel LLC Safety Risk Profile Forms; and
- Blank Forms.

2.1.7.2 Airport Profile Binder

The Airport Profile Binder is located in the Flight Department Office and is available for all employees. Airport-specific information contained in the Airport Profile Binder will be organized by airport identifier and reviewed as a part of the Preflight Planning process. The binder contains completed:

- Postflight Report Forms;
- Risk Assessment Tools;
- Incident / Hazard Report Forms; and
- Destination-Specific Safety Risk Profile Forms, if applicable.

2.2.0 KEY PERSONNEL RESPONSIBILITIES

A. The Owners of SK Travel LLC are responsible for:
- Sustaining conditions that advance the safe operation of company aircraft;
- Providing the proper resources to ensure the safe operation of company aircraft; and
- Supporting the company's Safety Management System.

B. The Chief Pilot / Director of Maintenance is responsible for:
- Ensuring that flight operations are conducted in compliance with all applicable safety regulations;

  This will be accomplished by a review of data collected through the Safety Management System. Safety regulations will be an item on the quarterly Safety Meetings.
- Administering the company Safety Management System;
- Establishing maintenance safety policies and procedures for ground operations and evaluating effectiveness via the Safety Management System;
- Validating and addressing any SMS deficiency, in collaboration with the Safety Officer, in an appropriate and timely manner.

C. The Safety Officer is responsible for:
- Managing the day-to-day efforts of the SK Travel LLC Safety Management System;
- Updating the Safety Management System as necessary to maintain regulatory compliance;
- Periodically assessing the Safety Management System for effectiveness and conformance;

  This will be accomplished by a review of the number of Incident / Hazard Reports submitted and the attendance and participation at the Safety Meetings. Tracking data and control strategies for identified risks through mitigation will also be used to evaluate effectiveness and compliance.
- Managing the Safety Management System documentation;
- Scheduling and leading quarterly and annual Safety Meetings;
- Documenting and archiving Safety Meeting Minutes;
- Monitoring and advising management and employees on all operator activities that may have an impact on flight and ground safety;

  The monitoring will be accomplished by participation in aviation associations and subscriptions to services providing updates (e.g., Jeppesen Manual Airway Services, NBAA, EBAA, etc.) Management will be advised through formal and informal meetings.
- Advising management of recognized hazards and unsafe / unhealthy working conditions;
- Monitoring industry safety concerns and trends that may have an impact on operations;
- Maintaining close liaison with industry safety associations;
- Developing and maintaining the Emergency Response Plan;
- Providing positive feedback on safety initiatives to all personnel;
- Performing annual internal Safety Management System audits;
- Disseminating safety related information; and
- Processing hazard and incident reports within the established SMS for the purpose of identifying and eliminating or mitigating workplace hazards.

D. The Pilot-in-Command is responsible for notifying the Chief Pilot / Director of Maintenance and the Safety Officer of any:
- Safety related incident in the aircraft;
- Situation requiring the use of the aircraft abnormal or emergency checklist; and
- Maintenance item resulting in a trip delay of more than one hour or trip cancellation.

E. Flight Department personnel are responsible for:
- Adhering to directions contained in Flight Department manuals and related procedures; and
- Participating proactively in the Safety Management System by:
  - Actively identifying, reporting and helping to mitigate hazards and safety deficiencies;
  - Applying training programs, checklists or other standardized initiatives to make sound maintenance, pre-flight and in-flight decisions, when appropriate; and
  - Providing timely input to management to ensure that the SK Travel LLC Safety Risk Profile is accurate and up-to-date.

    Note: SK Travel LLC develops and maintains an SMS training program that ensures that all personnel are trained and competent to perform their SMS related duties. The scope of the safety training shall be appropriate to each individual's involvement in the SMS.

2.3.0 HAZARD IDENTIFICATION, TRACKING AND RESOLUTION SYSTEM

2.3.1 Definitions

The following definitions apply:
- Hazard: The condition or circumstance that can lead to physical injury or damage;
- Risk: The consequence of a hazard, measured in terms of severity and likelihood; and

- Mitigation: The proactive measures taken to eliminate a hazard, or to reduce the severity or likelihood of one or more risks.

2.3.2 Analyzing Risks

A. The Safety Risk Profile is a proactive analysis tool that documents and helps to mitigate the levels of highest risk in the Flight Department. The Safety Risk Profile is normally broad in scope and examines the entire operation.

Note: The Safety Risk Profile can also be very detailed and only examine one particular hazard or topic, such as flying into a specific mountainous runway or performing major maintenance (e.g., removing and replacing an engine).

B. Flight Departments with higher risk profiles require more complete and thorough safety management strategies than those with lower risk profiles.

C. The Safety Risk Profile is the basis on which the SK Travel LLC Safety Management System is developed, implemented, and continually evaluated.

D. A typical risk analysis need not be complex. To conduct a risk analysis, the following steps will normally be performed:

1. Brainstorm event scenarios (events leading to an injury or accident);
2. Identify the hazards and associated risks;
3. Determine the severity and likelihood;
4. Decide how to manage the hazard and reduce associated risks (appropriate mitigation);
5. Document the information so that proper action will be taken and tracked; and
6. Continually assess the effectiveness of the results. Apply other risk-reduction strategies if the actions are not effective.

Note: The online "Safety Risk Profile Form" may be used to guide the analysis and brainstorming process.

2.3.3 Forms / Tools

The SK Travel LLC Flight Department uses five (5) different forms / tools to document risk analysis and mitigation:

1. The Safety Risk Profile Form, which is broad in scope and normally done annually.
2. The Risk Assessment Tool, which serves as a proactive risk strategy.
3. The Incident / Hazard Report Form, which is more detailed for a special instance and normally initiated as required.
4. The Deviation Report Form, which is used to document any deviation from the SK Travel LLC Flight Operations Manual, along with a risk assessment and mitigation actions.
5. The Postflight Report Form, which is used for service related issues. An Incident / Hazard Report Form may be submitted in conjunction with a Postflight Report Form if the service issue affects safety.

2.3.3.1 Safety Risk Profile Form

A. The Safety Risk Profile Form is used to examine and document risks throughout the entire Flight Department. This analysis is broad in scope and can provide the Chief Pilot / Director of Maintenance with a high-level risk evaluation of the entire Flight Department.

B. A Safety Risk Profile will be updated at least annually and/or any time the company undertakes significant change in its operations, personnel, or the aircraft it operates. (See Section 2.6.0 – Change Management Process.)

C. Normally, the risks will be examined with respect to the following:

- Operational Factors (airports, routes, weather, flight planning, procedures, NAVAIDS, etc.);
- Technical Factors (aircraft systems, aircraft performance, maintenance capabilities, fuel, oxygen, servicing, etc.);
- Human Factors (training, experience, fatigue, contract personnel, etc.);
- Security Factors (enroute and destination airports); and

- Facilities (hangar, ramp, offices, etc.).

D. To discern the range of consequences that can result from a hazard, two sub-steps are considered: Severity and Likelihood.

Severity	
Descriptor	**Description**
Catastrophic	Loss of life / property
Major	Serious injuries / major damage
Moderate	Moderate injury or damage
Minor	Minor injuries / minor damage
Negligible	Inconvenience

Likelihood	
Descriptor	**Description**
Almost Always	Could be expected to occur in most circumstances
Likely	Could be probable to occur in most circumstances
Possibly	Might occur at some time
Unlikely	Could occur at some time
Rarely	May occur in only exceptional circumstances

	Rarely	Unlikely	Possibly	Likely	Almost Always
Catastrophic	Medium Risk	High Risk	High Risk	High Risk	High Risk
Major	Low Risk	Medium Risk	High Risk	High Risk	High Risk
Moderate	Low Risk	Medium Risk	Medium Risk	High Risk	High Risk
Minor	Low Risk	Low Risk	Medium Risk	Medium Risk	High Risk
Negligible	Low Risk	Low Risk	Low Risk	Low Risk	Medium Risk

E. The safety risk ratings for the Safety Risk Profile are as follows:

Rank / Risk Level	Definition
☐ Low	Some potential for injury to personnel or damage to equipment
☐ Medium	Likely potential for injury to personnel or damage to equipment or aircraft
☐ High	Definite potential for injury or death to personnel, and damage to equipment, or loss of aircraft

F. Immediate control strategies and actions will be taken to mitigate and document risks rated High. The Safety Risk Profile Form has a section for documenting management decisions and/or comments on the reverse side.

Note: While all areas of risk are considered, those assessed as Medium or High in the Safety Risk Profiles will receive special attention in managing the day-to-day operations of the Flight Department.

G. Risk levels ranked as Low will be analyzed and assessed to confirm the risk level as being Low along with mitigation strategies and timelines for implementation.

H. When the Safety Risk Profile Form is completed, it will be filed in the Safety Binder and/or Airport Profile Binder.

2.3.3.2 Risk Assessment Tool

A. The Risk Assessment Tool is a proactive risk strategy. This tool provides the following five (5) step process in assessing risk:
   1. Complete a system and task analysis;
   2. Identify Hazards;
   3. Analyze the Risk;
   4. Assess the Safety Risk;
   5. Control the Safety Risk.

B. SK Travel LLC requires the Chief Pilot / Director of Maintenance to evaluate risk factor values over 25 from the perspective of accepting, rejecting, or mitigating the risk.

   Note: A Safety Risk Profile will be completed for a risk factor value that exceeds 18.

C. Further, SK Travel LLC SOPs prevent the operation of a flight if the risk value exceeds 30.

2.3.3.3 Incident / Hazard Report Form

A. The Incident / Hazard Report may be used to examine and document a specific hazard or topic in greater detail. This form may also be initiated in conjunction with the Safety Risk Profile Form.

B. The individual hazard or topic could be related to flight operations, maintenance, facilities, or administration. Normally, this form will require more complete and thorough safety management strategies than other lower level hazards or risks.

C. Immediate control strategies and actions will be taken to mitigate and document risks rated Medium or High. Data Tracking, including Risk Control Strategy and Assessment for Effectiveness, may be documented on the reverse side of the form.

   Note: When the risk ratings are assessed as Medium or High, a description of the tools, processes and procedures developed to mitigate them will be established and the associated company Safety Performance Goals will be examined.

D. If a report is ranked as Low, the incident / hazard will be addressed by those in attendance at the next scheduled Safety Meeting. The person who has submitted the report will be requested to attend the meeting.

E. When the form is completed, it will be filed in the Safety Binder and/or Airport Profile Binder using the proper tracking number.

F. SK Travel LLC will also evaluate the effectiveness of these risk-reduction initiatives at the annual Safety Meeting and provide mechanisms to continually improve the SMS process.

   Note: Interim changes to the SK Travel LLC Flight Operations Manual are published as Company Directives and distributed as Read & Initial documents. Company Directives are distributed electronically, as well as in hard copy in the Flight Department Office.

2.3.3.4 Deviation Report Form

A. The Deviation Report Form will be used to document deviations from the SK Travel LLC Flight Operations Manual.

B. A Risk Assessment will be conducted and mitigation strategies will be described.

C. All deviations will be in accordance with State regulations.

D. The form will contain the validity period for the deviation.

2.3.3.5 Postflight Report Form

A. A Postflight Report Form may be used to address quality of services received while conducting the trip. Information on this form will evaluate hotel accommodations, catering, FBO service, etc.

B. These forms will be retained in the Airport Profile Binder and on each employee's computer desktop to be referenced for future trip planning.

C. Information from this form may also be submitted to the Flight Planning and Weather Service to be placed in the "Remarks" section in the Flight Planning and Weather Service software.

   Note: An Incident / Hazard Report Form may also be completed, if required.

2.3.4 Risk Mitigation

A. A trip is initiated by the Owners through the Administrative Assistants.

B. The Chief Pilot / Director of Maintenance performs a Risk Analysis of the requested trip.

C. The following factors will be analyzed:
   - Operational Factors;
   - Technical Factors;
   - Human Factors;
   - Security Factors; and
   - Facilities Factors.

D. Risks identified in the above flight preparation process will be mitigated to the lowest level possible in coordination with the PIC, SIC, Flight Attendant, Chief Pilot / Director of Maintenance, Safety Officer, and Flight Planning & Weather Service, as required.

   Note: The Risk Assessment Tool may be used to assess the risk. A Safety Risk Profile may also be completed.

E. Enroute, flightcrews experiencing unanticipated risks are supported with risk mitigation via SATCOM, ATC, Flight Planning & Weather Service, Medical Service, Director of Maintenance, or aircraft manufacturer, as required.

F. Postflight: A Postflight Report and/or an Incident / Hazard Report, as required, will be completed and submitted. All Postflight Reports and closed Incident / Hazard Reports will be retained in the Safety Binder and/or Airport Profile Binder.

G. Relevant mitigation developed and documented during and after the flight will be retained to support the Risk Analysis process for future flights to that destination.

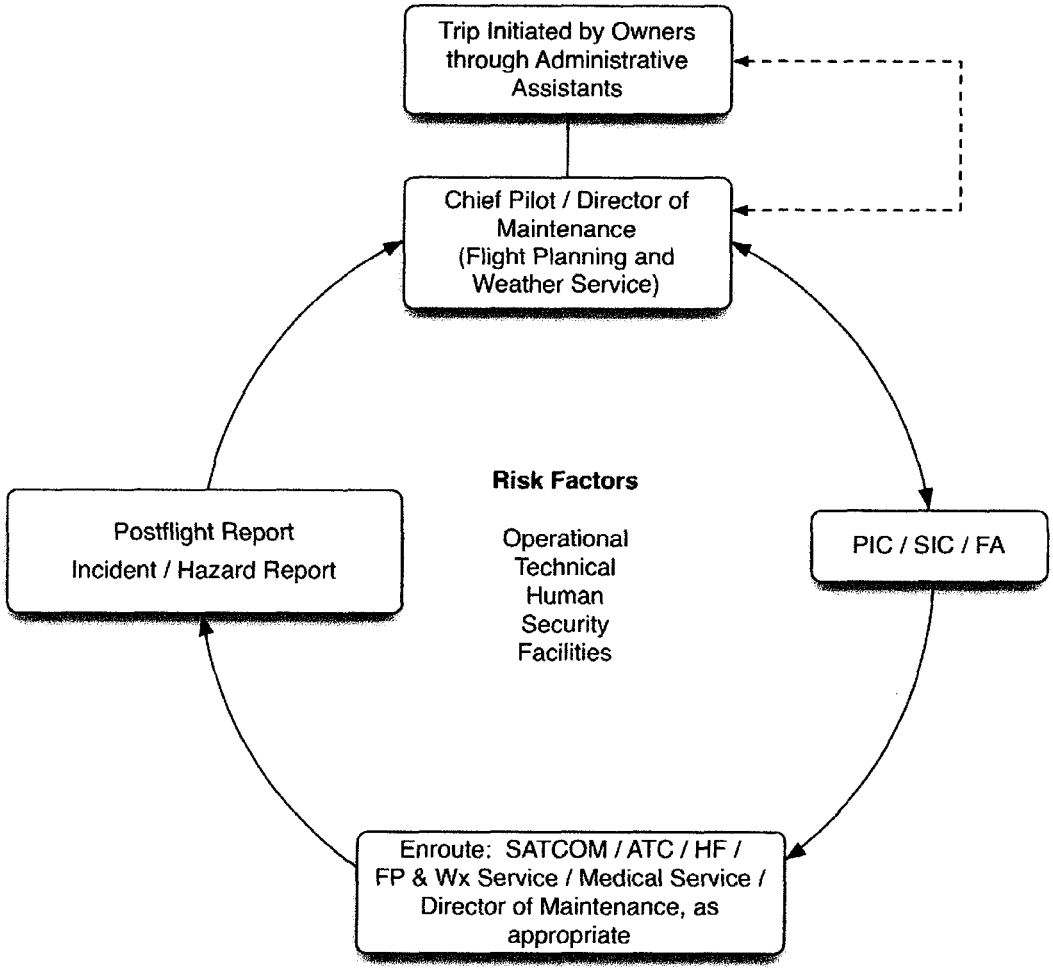

FIGURE 1: RISK MITIGATION PROCESS

2.4.0 SMS PROCESS

Completed Forms will be submitted and processed through the SK Travel LLC SMS as described below.

A. The purpose of the SMS is to proactively identify and address potential deficiencies in safety management. All Flight Department employees and persons carried on SK Travel LLC aircraft are expected to participate in the SMS.

B. The SK Travel LLC SMS is composed of three (3) main parts:

1. Incident / Hazard **identification:** All employees are participants in this effort;
2. Incident / Hazard **resolution and feedback**: This is a function of the Safety Officer and/or the Chief Pilot / Director of Maintenance; and
3. Incident / Hazard **tracking**: This effort is normally managed by the Safety Officer, or designee.

C. Reports / observations can be made to the Chief Pilot / Director of Maintenance and/or Safety Officer verbally, however written reports are required. Where verbal reports only are provided, the Safety Officer, or designee, and the person making the verbal report shall prepare a written report containing the information.

D. Blank copies of the Incident / Hazard Report can be found in the Flight Department Office and on the aircraft. Completed reports will be submitted in the designated inbox in the Flight Department Office.

E. The Safety Officer and/or Chief Pilot / Director of Maintenance will review all Incident / Hazard Report Forms and a response will be provided to the person making the report. If it is determined that a modification to a procedure or process is required, such information will be entered on the Incident / Hazard Report Form and tracked until the corrective action has been completed.

F. Written reports will be filed in the Safety Binder and/or Airport Profile Binder using the tracking number and reviewed on an annual basis to determine the effectiveness of the corrective measures.

G. Hazard identification, tracking, and resolution will be an agenda item at each of the Flight Department and/or Safety Meetings.

2.4.1 SMS Description

A. When an Incident / Hazard Report is submitted, the timeframe resolution table will be followed:

Rank	Anticipated Timeframe
Low	Next scheduled Safety Meeting
Medium	7 - 10 business days
High	24 - 48 hours

B. All reports will be confirmed for appropriate ranking by the Safety Officer and/or the Chief Pilot / Director of Maintenance.

C. If a report is ranked as Low, the Incident / Hazard will be addressed by those in attendance at the next scheduled Safety Meeting. The person who has submitted the report will be requested to attend the meeting.

D. If a report is ranked as Medium, the Safety Officer, the Chief Pilot / Director of Maintenance, the person submitting the report, and any other employee who can assist with a resolution will meet and agree upon an action within two (2) weeks.

E. If the report is ranked as High, the Chief Pilot / Director of Maintenance, the Safety Officer, and any additional employee who can assist in the required immediate action will meet and agree upon a control strategy.

Note: In all cases, the Chief Pilot / Director of Maintenance will be the final authority for approval.

F. Once a resolution or recommended action is agreed upon, the report will be forwarded to the Chief Pilot / Director of Maintenance for approval. If the Chief Pilot / Director of Maintenance does not approve the resolution or recommendation, the report will be returned for further discussion until a satisfactory resolution / recommendation is received by the Chief Pilot / Director of Maintenance.

G. If the approved resolution / recommendation requires a procedural change, a Company Directive will be issued. This directive will be read and initialed by the manual holder and inserted into Section 9 of the SK Travel LLC Flight Operations Manual.

H. If the resolution / recommendation does not require a procedural change, a memorandum may be published and forwarded via email to all employees.

I. The report, with the assigned tracking number, and the resolution will be scheduled for review at the annual Safety Meeting. Additional resolved Incident / Hazard Reports will also be included in the final steps. These steps include:

- Measuring the actions / resolution for effectiveness;
- Conducting a trend analysis; and
- Investigating any underlying circumstances.

2.4.2 SMS Flow Chart

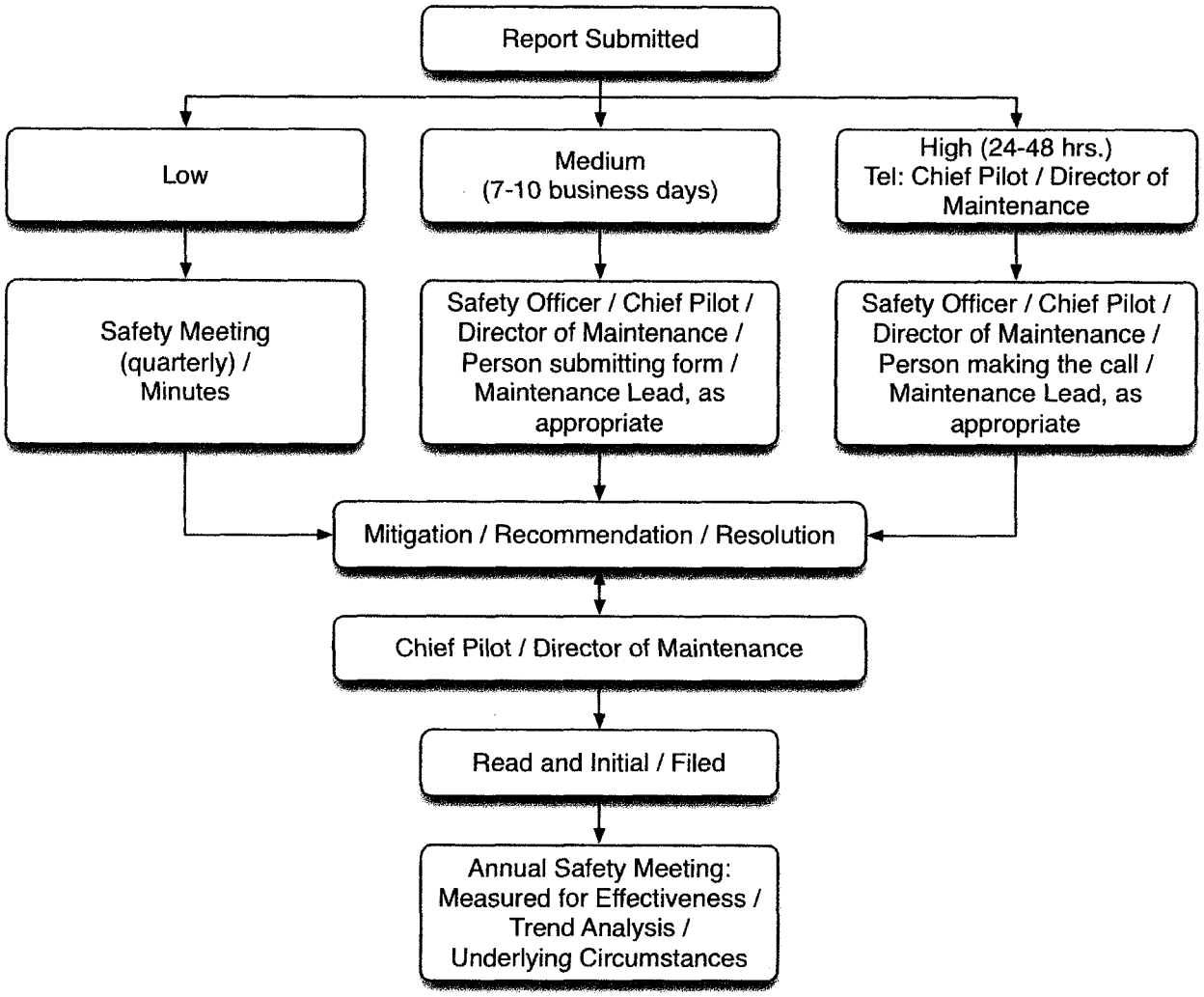

FIGURE 2: SMS FLOW CHART

2.5.0 FLIGHT OPERATIONS QUALITY ASSURANCE (FOQA) PROGRAM

The FOQA is a voluntary program. SK Travel LLC uses Flight Data Recorder (FDR) information in collaboration with manufacturer, training organization, third party vendor, etc.

A. SK Travel LLC will use FDR data to identify and correct deficiencies in all areas of flight operations.

B. FOQA data can help reduce and eliminate safety risks, as well as minimize deviations from State Regulations, aircraft manufacturers limitations, and the SK Travel LLC Flight Operations Manual (FOM).

C. The key objectives of the FOQA program are as follows:

- De-identification of FDR data;
- Identification of negative trends; and
- Integration with the SK Travel LLC Safety Management System and process.

2.6.0 DOCUMENT MANAGEMENT SYSTEM

The Chief Pilot / Director of Maintenance, or designee, will keep the Document Management System current. This includes:

- The SK Travel LLC Safety Policy;
- Safety Risk Profiles;
- CFRs and additional State regulatory guidance;
- Operational documents or agreements;
- The SK Travel LLC Flight Operations Manual including Standard Operating Practices (SOPs) for each aircraft type;
- The SK Travel LLC International Operations Manual;
- Aircraft checklists;
- Training course outlines and records;
- Letters of Authorization, approvals, deviations, licenses, certificates, etc. (OPSS);
- Aircraft maintenance programs as described in Section 6;
- The Proficiency Certification System as described in Section 5; and
- Subscriptions, Organizations, or Industry sources:
  - The Code of Federal Regulations (CFRs) and other relevant FAA publications will be regularly reviewed by the Chief Pilot / Director of Maintenance, or designee, in order to identify all applicable laws, regulations and standards, including all approvals, authorizations, exemptions and permitted deviations (FAA Home Page);
  - Flight planning information documents and flight publications that will be used by the flightcrew; Jeppesen Airway Manual Services, DoD information, NOTAMS, AIM, Flight Planning and Weather Services, etc.;
  - Current IS-BAO Standards and Protocols;
  - National Business Aviation Association, Inc. (NBAA) may be consulted online for a variety of issues, documents and information;
  - The Aircraft Manufacturer website may be consulted for a variety of technical issues;
  - Document library for operations and maintenance consisting of the Airworthiness Directives (ADs), and Customer Bulletins related to ADs, etc.; and
  - Aircraft Engine, APU, and Maintenance Library CMP.

2.7.0 CHANGE MANAGEMENT PROCESS

A. Prior to undergoing any significant change that could impact the Flight Department, a Change Management Process will be undertaken. Events that could indicate the need for such a process are:

- The introduction of a new aircraft (make / model) and/or removal of an aircraft type;
- Significant change in the nature of the operation (e.g., dynamic business growth, new operating environment, etc.);
- Changes in hiring or scheduling practices;
- Changes to organizational structure; and
- Significant change in aircraft maintenance arrangements, etc.

B. As soon as it has been determined that the change event will occur, a Safety Risk Profile will be completed and progressively updated. On the basis of that assessment and any other available information, the Chief Pilot / Director of Maintenance, or designee, will develop a Change Management Plan. The Change Management Plan will include:

1. An assessment of the changes required to items such as:
   - Operating and maintenance procedures and processes;
   - Personnel training and competency certification;
   - Flight Operations Manual, including aircraft SOPs;
   - International Operations Manual; and
   - Maintenance Procedures Manual.
2. A plan for development of the required changes.

C. After the change has been implemented, a review for effectiveness will be accomplished. If there is any doubt of the effectiveness of the Change Management Process, a more comprehensive post-implementation review or a Safety Management System Audit will be conducted.

2.8.0 SAFETY MANAGEMENT SYSTEM / IS-BAO AUDIT

A. A Safety Management System Audit, including IS-BAO protocols and standards, is conducted by an independent IS-BAO certified auditor. This audit is conducted to continually meet IS-BAO certification. The prime purpose, however, is to identify areas in which safety performance may be evaluated and enhanced.

B. This audit will be used to validate the SK Travel LLC Safety Risk Profile and, in effect, safety performance. It will normally include:

1. Onsite visit to the base of operations;
2. Interviews with the Chief Pilot / Director of Maintenance and operational staff within the company;
3. Document reviews (e.g., for completeness, currency and appropriateness); and
4. An evaluation of the SMS tools being employed by the company (e.g., number of reports, effectiveness, etc.).

C. Findings from an SMS / IS-BAO Audit will be corrected and tracked in the hazard tracking system, and may be used to update the Safety Risk Profile and the Safety Management Strategy.

2.8.1 Internal Audits

SK Travel LLC also conducts an internal audit on a periodic basis. The internal audit is used to track departmental processes to ensure conformity, recommend improvements, and to assist in maintaining the ultimate in safety performance and standards. Internal Audit Sheets provided by the SK Travel LLC IS-BAO subscription will be utilized to accomplish the internal audit. This effort will be directed by the Safety Officer.

Note: The IS-BAO Audit Sheets will be used to ensure continued conformance to the IS-BAO protocols and standards.

2.9.0 SMS FORMS

2.9.1 Safety Risk Profile Form

SK TRAVEL LLC SAFETY RISK PROFILE
Step 1. Identification of Hazards and/or Risks: The goal of the Safety Risk Profile is to identify the biggest risk that challenges the SK Travel LLC Flight Department and develop mitigation measures in order to lower that risk. This risk will be specific to the SK Travel LLC operation, as each flight department faces their own unique challenges (types of missions, location of operations, capabilities of equipment, available resources, etc.). In the text area below, please brainstorm and identify the biggest risk specific to your flight department. *Examples: Cultural challenges due to pilots from different backgrounds, frequent operations into uncontrolled airports, infrequent flying schedule / proficiency issues, etc. This profile may also be used to identify risks in managing any change the flight department maybe anticipating or undergoing.*
Step 2. Analyze Identified Hazards and/or Risks: Risk Analyses guide the Flight Department safety management. They need not be complex. However, plan so that the Risk Analysis can be accomplished without interruption.
A. Categorize the hazards/risks: Is the hazard and/or risk identified in Step 1 ☐ Operational ☐ Technical ☐ Human ☐ Security ☐ Facilities For example, Human Factors category could be the number of pilots, currency, crew rest facilities, etc.
B. Is there an underlying circumstance that may be causing the hazard? ☐ Yes ☐ No If yes, please describe the circumstances: e.g., Relatively infrequent (6 times a year) operations into a mountainous VFR airport in winter

C. Severity and Likelihood

To discern the range of consequences that can result from a hazard, two sub-steps are considered: Severity and Likelihood. Select the appropriate category

Severity:

- ☐ Catastrophic (Potential for loss of life or destruction of aircraft)
- ☐ Major (Potential for serious injury or damage to the aircraft)
- ☐ Moderate (Potential for moderate injury or damage to the aircraft)
- ☐ Minor (Potential for minor injury or damage to the aircraft)
- ☐ Negligible (Inconvenience)

Likelihood:

- ☐ Almost Always
- ☐ Likely
- ☐ Possibly
- ☐ Unlikely
- ☐ Rarely

	Rarely	Unlikely	Possibly	Likely	Almost Always
Catastrophic	Medium Risk	High Risk	High Risk	High Risk	High Risk
Major	Low Risk	Medium Risk	High Risk	High Risk	High Risk
Moderate	Low Risk	Medium Risk	Medium Risk	High Risk	High Risk
Minor	Low Risk	Low Risk	Medium Risk	Medium Risk	High Risk
Negligible	Low Risk	Low Risk	Low Risk	Low Risk	Medium Risk

D. What is the level of risk?

- ☐ Low (Some potential for injury to personnel or damage to equipment.)
- ☐ Medium (Likely potential for injury to personnel or damage to equipment or aircraft.)
- ☐ High (Definite potential for injury or death to personnel, and damage to equipment, or loss of aircraft.)

E. List similar events and hazards

For example, a high risk would be a combination of winter operations into a remote mountainous site.

F. Developing Mitigation

G. Next Review / Assessment Date:

2.9.2 Risk Assessment Tool

Date: _____ Departure: _____ Trip #: Tail #: Destination:		Risk Value	Flight Value
Pilot Qualifications and Experience			
1	Captain with less than 100 hours in type	5	
2	First Officer with less than 100 hours in type	5	
3	Captain with less than 60 hours last 90 days	3	
4	First Officer with less than 60 hours last 90 days	3	
5	Duty day greater than 12 hours	4	
6	Flight time (Greater than 8 hours in the duty day)	4	
7	Crew Rest (Less than 10 hours prior to the duty day)	5	
	Total Factor Score - Section 1		
Operating Environment			
8	VOR / GPS / LOC / ADF (Best approach available w/o vertical guidance)	3	
9	Circling approach (best available approach)	4	
10	No published approaches	4	
11	Mountainous airport	5	
12	Control tower not operational at ETA or ETD	3	
13	Uncontrolled airport	3	
14	Alternate airport not selected	4	
15	Elevation of primary airport greater than 5000 ft. MSL	3	
16	Wet runway	3	
17	Contaminated runway	3	
18	Winter operation	3	
19	Twilight operation	2	
20	Night operation	3	
21	Stopping distance greater than 80% of available runway	5	
22	Repositioning flight (no passengers or cargo)	3	
23	Pop up trip (Less than 4 hours crew notice)	3	
24	International operation	2	
25	No weather reporting at destination	3	
26	Thunderstorms at departure and/or destination	3	
27	Severe turbulence	5	
28	Ceiling & visibility at destination less than 500 ft. / 2 sm	3	
29	Heavy rain at departure and/or destination	3	
30	Frozen precipitation at departure and/or destination	3	
31	Icing (moderate-severe)	5	
32	Surface winds greater than 30 knots	4	
33	Crosswinds greater than 25 knots	4	
34	Runway braking action less than fair	5	
	Total Factor Score - Section 2		
Equipment			
35	Special Flight Permit Operation (ferry permit)	3	
36	MEL / CDL Items (items related to safety of flight)	2	
37	Special flight limitations based on AFM equipment limitations	2	
	Total Factor Score - Section 3		
	TOTALS		

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2.9.3 Incident / Hazard Report Form

SK TRAVEL LLC	INCIDENT / HAZARD REPORT FORM
	Date: _____ Time: _____
	Tracking Number:

Describe the Incident / Hazard or potential safety issue you observed:

Risk Factors (Check all that apply): ☐ Operational ☐ Technical ☐ Human ☐ Security ☐ Facilities

Name: Date: Phone #:

Risk Level	Definition	Timeframe for Action / Resolution
☐ Low	Some potential for injury to personnel or damage to equipment	Next Safety Meeting
☐ Medium	Likely potential for injury to personnel or damage to equipment or aircraft	7 - 10 Business Days
☐ High	Definite potential for injury or death to personnel, and damage to equipment, or loss of aircraft	24 - 48 hours ☐ Tel: Chief Pilot / Director of Maintenance

Comments reviewed by: _____ Date: _____

What steps can be accomplished to mitigate the risk?

Proposed Corrective Action:

Accepted		Rejected		If rejected explain reason and proposed alternative action:

Chief Pilot / Director of Maintenance: _____ Date: _____

Corrective Action Implemented:

Date: _____

☐ Company Directive ☐ Memorandum ☐ Other _____

Review for Effectiveness conducted by: Date:

Tracking Data

Risk Factor:		**Tracking Number:**		**Initial Risk Rating:**	
Risk Control Strategy / Corrective Action:					
Implementation Date:					
Assessment for Effectiveness:				**Assessment Date:**	

Notes:

Risk Factors: Operations, Technical, Human, Security, and/or Facilities

Initial Risk Rating: Low, Medium, or High

2.9.4 Deviation Report Form

DEVIATION REPORT FORM	
Name:	Date:
Deviation:	
Describe mitigation strategies, if required:	
Is the requested deviation in accordance with FAA and/or State regulations? ☐ Yes ☐ No	
Approved by: (Signature)	
Date:	
Validity period for deviation From:_____ To:_____	

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2.9.5 Postflight Report Form

Date: _____	PIC: _____	SIC: _____
Airport Identifier: _____	Reg. #: _____	F/A: _____

Operational / Logistics (i.e., Customs, FBO, hotel, ground transportation)

Passenger Service (i.e., catering, pax comments / requests)

Additional Information