DHS GmbH

Am Hagen 5

59368 Werne

Safety Management Systems

Prepared for: Station Management and all Employees

Prepared by: DOM

Issued: 28.01.2022, last update 20.02.2026

Version: V2/Revision 2

This version supersedes all previous versions released prior to the date of issue.

GENEHMIGT
Von Dominika Doruch , 16:05, 22.02.2026

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

Contents

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

Record of revisions

Part	Title	Original Issue	Latest Review
2.	Safety Assurance	28.01.2022	25.09.2023
3.	Safety Promotion	28.01.2022	25.09.2023
0.11.	Safety Reporting Policy	12.2018	13.03.2024
2.	Safety Assurance	28.01.2022	07.10.2024
4.	Emergency Preparedness & Response	24.03.2025	
3.	Safety Promotion	28.02.2022	28.04.2025
1.	Safety Risk Assessment	28.01.2022	28.04.2025
2.	Safety Assurance	28.01.2022	20.02.2026

Change revision summary

Part	Description of change
2.2.	SPI updated
3.2.	Monthly Safety SafeUp! Memo added
0.11.	Safety Reporting Policy Statement revised
2.2.	SPI updated
4.	New chapter added: "Emergency Preparedness & Response" – introduces structured reference to ERP Manual.
3.2.	Expanded safety communication section incl. SafeUp! tools, digital channels, and planned Avbis feature
1.3.	New section introduced to define the Management of Change (MOC) process
2.3.	Safety Performance Monitoring enhanced through introduction of Incident Management Dashboard, trend analysis and management review linkage.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

0 GENERAL

0.1. INTRODUCTION

The management system for any business is the structures implemented to achieve the business objectives. In the context of this document, the key strategic objectives are to ensure the business activities are conducted in a safe and secure manner, protecting our customers, our people and contractors, as well as property and assets, from harm. However, meeting any safe and secure objectives has to be achieved in harmony with all other DHS strategic objectives and therefore should not be viewed in isolation or managed separately. Whilst there are explicit regulations that require a business to implement a management system across its organisation, the value to DHS of having an effective and efficient operating management system is directly linked to the ability to achieve its strategic objectives including Safety, Operations and Commercial objectives. A management system provides the framework (including responsibilities, competencies and procedures) to help efficiently deliver the desired outputs required for achievement of company objectives. For safety and security, there are risks that are well understood, those that are partially understood and those that are unique and cannot yet be understood or defined. This Safety Management System (SMS) Manual contains key information for line managers on SMS and how that policy should be implemented at an operational level.

As such, it is an important document that must be maintained according to the following procedures: Line Managers should ensure that the Safety Management System is:

- Available for review at each location
- Legible
- Maintained in an orderly manner, with revisions incorporated promptly and obsolete sections removed
- Accessible to those managers who should be aware of its contents.

Line managers should pay particular attention to any amendments to the Safety Management System Manual, which may require changes to local procedures.

For structural alignment of health & safety standards across DHS stations, refer to Section 0.2 of the DHS Health & Safety Manual.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

0.2. SAFETY POLICY AND OBJECTIVES

0.2.1. SCOPE OF SMS

Intent

The Safety Management System (SMS) provides a framework and guidance on managing occupational health and safety. This manual sets out the recommended minimum standard that shall be applied throughout DHS at all locations.

Purpose

DHS encompass a broad range of activities in a large number of locations around the world, each with its own operating circumstances and pressures. The purpose of the SMS is to provide an overview of DHS's hierarchy of policies and set parameters for each facility to strive to operate. DHS is fully committed to a process of continual improvement to ensure safe systems of work are available to safeguard its operational activities, employees, and customers alike.

How

A SMS is a business-like approach to safety. It is a systematic, precise and proactive process for managing safety risks. As with all management systems, a SMS provides for goal setting, planning and measuring performance. Our SMS is woven into the fabric of our organisation, it becomes our culture; the way we work.

Full implementation will help: Proactively, re-actively and predicatively control risks to a level that is acceptable. Take appropriate action and measure how effective risks controls are. Thus preventing incidents from occurring.

Benefits

An effective SMS provides many other potential benefits, including:

▸ The ability to control potential risks faced by Operations.
▸ A clear, documented, consistent (standard) and easily understood approach to achieving safe operations.
▸ A common language to establish safety objectives, targets and implement/monitor safety risk controls
▸ Active involvement of staff in safety and building a positive safety culture.
▸ Demonstrable control to all stakeholders e.g. employees, customers, airport authorities, regulators etc.
▸ Reduction or removal of operational inefficiencies.
▸ Decreased insurance costs and improved reputation.
▸ Potential defence from legal action.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

0.3. MANAGEMENT COMITTMENT AND RESPONSIBILITY

Safety first

Safety and security are absolute requirements.

DHS fosters a working environment in which Operational Safety has top priority: the health and safety of our employees, customers and passengers shall never be compromised. DHS recognizes that a safe working environment is essential within the aviation industry and adds to and enhances the company's overall value, both in the short and long term. For this reason we have made health and safety an integral component of all our management systems and all our working practices. We ensure the safety of our employees, passengers, aircraft and customer's assets through our safety management system (SMS). We believe that transparency and rigorous follow up of incidents and near misses are key components to harness an environment where safety is the number one priority.

0.4. SAFETY GOALS

The overarching objective is to have a continuous improvement of our safety performance from the previous year.

We strive for minimum year on year improvement of at least 25% reduction in safety and security incidents like:

- INADs
- Boarding errors and incidents
- Mis-identifications of passengers and/or baggage
- Flight/Trip file documentation errors incl. loading documentation

Safety goals are set on yearly basis by the Management teams at each station.

0.5. SAFETY ACCOUNTABILITIES

We recognize the impact our activities have on the environment, the communities in which we operate, and the wider society around us. Operating in a socially responsible manner is important to us and our stakeholders, enhances the value of our business and is central to our culture. We are committed to working collaboratively with our stakeholders to ensure that our business activities are conducted safely, ethically and efficiently. Health, Safety and Security above all other things are prioritized with safe and secure practices at the heart of our culture. Ethical practices which are open and free from discrimination and harassment are paramount, and promote a positive profile to stakeholders. Our business recognizes its legal, moral and commercial responsibility for effective policies, robust health, safety and security management systems and controls to identify, recognize and eliminate or minimize risk where reasonably practicable.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

For an operational breakdown of responsibilities and duty holders in the context of health and safety, see Section 1 of the DHS Health & Safety Manual.

0.6. SAFETY AND SECURITY AS A TOP PRIORITY

Safety and security is our number one priority and every employee has a responsibility to ensure operations are carried out in a safe and secure manner. The CEO has overall accountability for health and safety within the organisation. With his leadership, he will create a culture in which safety is integral to all managers and employees. He has a responsibility to appoint people who have a strong, positive attitude towards safety. A report on SMS performance is the first operating item at all management meetings. The report includes injury statistics and trends as well as lessons learned, training performance, regulatory and legislative updates. Our health and safety policy statement focuses on establishing a suitable environment, providing proper training, communication and consultation with employees. The levels of management with the authority to make decisions that affect safety operations. Responsibilities for ensuring operations are conducted in accordance with applicable regulations and standards. Accountabilities of management, irrespective of other functions, as well as non-management personnel, with respect to the safety performance. Means of communication vary depending on the information to be cascaded through the organisation.

This may include management published bulletins/posters and Email correspondence. Changes and / or amendments to airline customer procedures vary depending on the size of their organisation. Examples of communication would be through their own internal intranet systems, read & signs and monthly, quarterly or annual performance meetings.

For practical implementation of security culture and staff awareness, refer to Section 2.16 of the DHS ASM.

0.7. HEALTH AND SAFETY MANAGER/OFFICER

Every station should have a Health and Safety/Security Manager/Officer to ensure compliance with corporate policies on Health & Safety and all other safety regulations. In the event the station does not have a dedicated position, this will be delegated to a senior member of the stations management team. The H&S Manager/Officer conducts risk assessments, accident investigations and safety inspections, supervises the staff on working in a safe manner and ensures reporting of all accidents, incidents and near misses.

For defined responsibilities of the Head of Security and local security accountabilities, see Sections 2.5 to 2.7 of the DHS ASM.

For detailed responsibilities of the Safety, Security & Compliance Manager, refer to Section 1.2 of the DHS Health & Safety Manual.

0.8. ACCIDENT, INCIDENT AND DANGEROUS GOODS OCCURENCE REPORTING

Our goal is to continuously improve the safety of our operation. We realise that accidents and incidents can happen, however we see it as every employee's duty to report them and create a safe working environment at all times. This is key to ensure we have the opportunity to resolve them, learn about the contributing factors and implement strategies, procedures and policies to eradicate or reduce the likehood of future occurrences. In the interest of safety, to ensure the full, free and uninhibited reporting of any incident /accident, which may affect the health and safety of DHS employees or any other person who might be affected by our undertaking, including aircraft handling and flight safety. Every employee is actively encouraged to report any incident affecting safety/security and to cooperate fully throughout any subsequent investigation.

All incidents, including near misses, must be reviewed; investigation will be dependent upon the severity of the incident. The purpose of an investigation is not to apportion blame but to establish the facts, to understand the root cause(s) of the incident, and to develop the appropriate actions necessary to eliminate or reduce the likelihood of the incident recurring. All investigations should generally be completed within seven days of the incident with findings recorded in the online investigation tool Safety Culture, only in the case of exceptional or complex investigations can the seven-day reporting period be extended.

Managers must ensure that recommendations arising from an accident investigation are evaluated and fully implemented. To underpin our core values of safety and security, it is imperative that we learn from our mistakes, strive to reduce human error, and develop adequate safety systems to ensure the highest level of safety is maintained. To achieve this we must develop and foster a culture that encourages the reporting of accidents without fear of disciplinary action being the key concern. Disciplinary action for damage (suspected or actual) to our equipment or property or our customer's equipment or property will generally be limited to the following circumstance:

- An employee has failed to immediately report an accident or incident covered under this policy.
- An employee has failed to fully and honestly participate in investigations covered under this policy.
- An employee demonstrates negligence or an intentional disregard for the safety of our employees and assets as well as our customers, and their respective assets.
- An employee has committed a series of errors that demonstrate a general lack of due care and attention.
- The employee's actions involve criminal activity, substance abuse, controlled substances, alcohol, violation of regulatory authorities or airport regulations or intentional falsification.

The decision as to whether an employee's actions fall within the boundaries of the circumstance noted above will be at the sole discretion of management.

For detailed reporting timelines, incident categories, and the Safety Culture tool application, see Section 7 of the DHS Health & Safety Manual.

For detailed guidance on investigation procedures, including root cause analysis, categorization, roles of investigators, and report structure, refer to the DHS Investigation Principles Manual.

For local procedures and detailed workflows for accident and incident investigation, please refer to the Station Quality Manual (SQM), Sections 3.3.1 to 3.3.3.

For reporting procedures related to security incidents and potential unlawful interference, see Section 2.13 of the DHS ASM.

For procedures related to cybersecurity incidents such as data breaches or device loss, refer to Section 3.3 of the DHS Data Protection & Security Policies Manual.

0.9. WHISTLEBLOWING

We have a number of fundamental principles and values which we believe are the foundation of sound and fair business practice and are important to uphold. This includes a zero tolerance position in relation to corruption, wherever and in whatever form that may be encountered.

Anyone representing DHS is expected to conduct themselves with integrity, impartiality and honesty. We seek to develop a culture where inappropriate behaviour at all levels is challenged. All employees are encouraged to report genuine concerns about malpractice, illegal acts or failures to comply with recognised standards of work, without fear of reprisal or victimisation.

Individuals raising genuine concerns will be supported and not subjected to victimisation, detriment, or risk job security.

0.10. FAIR AND JUST REPORTING CULTURE

We continually strive to promote a 'Just culture'; where people are encouraged to provide essential safety related information, but in which they are also clear about where the line must be drawn between acceptable and unacceptable behaviour.

A culture that also supports the underlying principles of trust, questioning attitude, commitment to continuous safety improvement, where the investigation process tries to identify organisational as well and individual attitudes/ acts that lead to safety incidents or accidents. This aims to provide operational management with general guidance with respect to the appropriate levels of individual

Controlled document. Controlled version on AVBIS/DHS Manuals. Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

accountability that should be applied, for actions taken that led to an incident or accident.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

0.11.   SAFETY REPORTING POLICY – FAIR & JUST CULTURE

Safety Reporting Policy – fair & just culture

Ensuring the full, free, and unrestricted reporting of incidents/accidents that may affect the health and safety of DHS employees or others who may be impacted by our company—including aircraft handling and flight safety—is DHS's top priority in the interest of safety. Therefore, it is each employee's duty to report any safety incident and to provide complete cooperation for the duration of any investigation that follows.

All incidents, including near misses and unsafe events, must be investigated; the extent of the investigation will depend on the severity of the incident. An investigation's goals are not to assign blame but rather to gather information, identify the incident's primary cause or causes, and create suitable countermeasures to lessen the possibility of a recurrence.

Using the airline's protocols, all investigations should typically be finished within seven days of the incident. Only extraordinary or complicated investigations may be granted an extension of this seven-day reporting period.

Objective

Our objective is to consistently raise the level of operational safety. Although accidents and incidents do occur, we believe that every employee has a responsibility to report them and maintain a safe working environment at all times. This is essential to make sure we can address them, find out more about the underlying causes, and put plans, procedures, and policies in place to eliminate or lower the likelihood of similar events and/or incidents.

To achieve this, we need to create and support a culture that makes it acceptable to report accidents without worrying about facing consequences.

In order to maintain the highest level of safety, it is crucial that we learn from our mistakes, minimize human error, and create suitable safety systems. These are the fundamental principles of our health and safety.

Although DHS´s employment is discretionary, disciplinary action for damages to our equipment or property or to our customer's equipment or property is generally limited to the following circumstances

- An accident or incident covered by this directive has not been reported by an employee right away.
- An employee has neglected to contribute completely and truthfully to the inquiries under this policy.
- An employee exhibits carelessness or deliberate disregard for our workers' and our assets' safety as well as that of our customers' and their assets.
- A pattern of misbehavior by an employee indicates a general lack of consideration and care.
- The employee's actions include breaking the law, abusing drugs or alcohol, abusing controlled substances, breaking airport or governmental regulations, or purposefully counterfeiting.

Management alone has the authority to determine whether an employee's actions qualify under the aforementioned conditions.

But collaboration between all governmental levels is necessary to ensure that DHS provides a secure operating environment.

Ingo Schnitger
CEO

V2R0_2024

For disciplinary procedures in case of misconduct or breach of rules, refer to Section 2.15 of the DHS ASM.
Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

For disciplinary measures in case of intentional misuse or breach of IT security protocols, see Section 4.2 of the DPISP Manual.

For further guidance on fair and just treatment of reporting employees, refer to Section 7 of the DHS Health & Safety Manual.

0.12.   ACCOUNTABILITIES AND RESPONSIBILITIES

DIRECTOR (CEO) AND SENIOR MANAGERS

Within their area of control, every Senior Manager must:

- continually promote the safety policy to all personnel and demonstrate their commitment to it;
- provide necessary human and financial resources for its implementation;
- and establish safety objectives and performance standards.

MANAGERS AND SUPERVISORS

Managers and supervisors must implement the SMS within their area of control and encourage the engagement of their staff in the safety management processes.

ALL EMPLOYEES

All employees must:

- ensure that they work safely in accordance with company policy and procedures;
- report safety incidents, risks or safety concerns using the SMS reporting system;
- recognise opportunities to contribute to the continuous improvement of safety and its management;
- keep up-to-date with information and knowledge relevant to performing their duties safely.

0.13.   DOCUMENT CONTROL PROCEDURES

Introduction

This section has been produced for the purpose of ensuring the following:

- a formal mechanism is in place for the maintenance and control of all company documentation, communicating requirements to staff or providing reference data;
- that all procedures are uniquely identified as such and are of a common format with clear content;
- all key policies, systems, programs, processes, procedures and/or plans are determined and implemented throughout the organization;
- all procedures are reviewed for adequacy, and approved/authorised prior to being used in DHS and subsidiary businesses;
  - consistency in the use of terminology.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

Scope

The requirements outlined within this section are mandatory for all areas of DHS and its subsidiaries, and are to be applied as a framework for the maintenance and control of all company documentation. All key company policies, procedures, forms and templates shall be published and accessible to the appropriate personnel. These processes will enable personnel to carry out their duties in conformance with applicable regulations, laws, rules, standards and requirements.

Responsibilities

The Station Manager is responsible for ensuring adequate and correct information is made available to staff to enable them to discharge their responsibilities and exercise their authority in a manner which ensures full compliance with regulatory and DHS requirements. The function of the safety & security department is to monitor compliance with distribution and control of company procedures, instructions, etc., reference data and amendment status. All Line Managers must ensure that staff in their areas of responsibility are made aware of and have access to correct and complete information to enable them to perform their tasks in an adequate manner and in full conformity with company quality system and regulatory requirements. Any documentation held in hard copy shall be considered uncontrolled and used for back up only.

For procedures related to IT access control, password security and GDPR compliance, refer to Section 7.2 of the DHS ASM.

For detailed requirements on system access, physical data security, and handling of personal information, refer to Sections 1.1, 1.2, and 2.1–2.3 of the DHS Data Protection & Security Policies Manual (DPISP).

0.14.   STATION QUALITY MANUAL (SQM)

The Station Quality Manual (SQM) is a management tool for all Station Management and employees. It is designed to ensure control over the Safety & Quality of the operations processes and the associated documentation, by giving explicit descriptions of duties and responsibilities for selected management positions including operational staff.

1 SAFETY RISK MANAGEMENT

1.1.   EFFECTIVE CONTROLS: THE THREE LINES OF DEFENCE

The Three Lines of Defence model distinguishes among three groups (or lines) involved in effective risk management:

▸   First line: Functions that own and manage risks

  ▸ Second Line: Functions that oversee risks
  ▸ Third Line: Functions that provide independent assurance.

In the Three Lines of Defence model, management control is the first line of defence in risk management, the various risk control and compliance oversight functions established by management are the second line of defence, and independent assurance is the third. Each of these three "lines" plays a distinct role within DHS.

First line of Defence

Operational management naturally serves as the first line of defence because controls are designed into systems and processes. Operational management are responsible to ensure adherence to Instructions and Training. There should be adequate managerial and supervisory controls in place to ensure conformance.

Self-Assessments assist Operational management in setting clear expectations, which is later followed up by an inspection and/or audit to identify opportunities for improvement.

Note: The Station/Branch Manager shall ensure documented evidence is available to verify standards they have confirmed. Auditors that carry out Independent audits shall inspect the evidence. In the event evidence is not available, the auditor shall record the irregularity in their audit report.

Second line of Defence

A single line of defence can often prove inadequate. Management establishes various risk management and compliance functions to help build and/or monitor the first line of defence controls. This is achieved through consistent and regular Inspections. Real time dashboards (Safety Culture) are available to enable management to identify trends that should be actively communicated and discussed at regular staff and management review meetings. Mitigation strategies should be developed to reverse negative trends.

Third line of Defence

Internal auditors provide senior management with comprehensive assurance based on the highest level of independence and objectivity within the organisation.

1.2. HAZARD IDENTIFICATION, CHANGE MANAGEMENT & RISK ASSESSMENT/MITIGATION

Risk Assessment is vital to ensure potential hazards that could affect operations are mitigated before they occur. Firstly it determines the corresponding safety risks to operations and is then assessed to determine what corrective action is required to mitigate the hazard.

These actions are then developed and implemented in operations.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

Section 5 of the H&S manual describes the risk assessment and mitigation programme that is implemented to prevent potential hazards occurring. Once the hazards have been identified, they are assessed in the context of the potential damaging consequences in the risk assessment process, typically in the form of two components:

1. Likelihood of an occurrence

2. Severity of the consequence of an occurrence

Controls are identified and implemented to mitigate the risk as low as practically possible/acceptable. Station managers must check and sign the risk assessment to ensure the controls are fully implemented, effective and communicated to all employees, contractors and visitors on all risks as identified by the risk assessment. This will include any preventative or protective measures that are to be taken, especially for procedures and training dealing with serious or imminent danger.

The Task register is used to document the risk assessment information and monitor risk mitigation actions until the next review.

Risk assessments shall be reviewed:

- ▶ When new work practices/services or equipment are introduced;
- ▶ Modification of existing systems, equipment, programs;
- ▶ When new large groups/batches people are employed;
- ▶ Following any accident, incident or dangerous occurrence;
- ▶ Periodically to ensure they are still valid.

The review should be annual unless the task is High hazard/risk, in which case it should be reviewed more frequently.

In cases where safety risks involve major disruptions or emergency events, additional guidance can be found in the DHS ERP Manual, Sections 1 and 10 (Business Continuity Planning).

For the practical application of risk assessments at station level, including review intervals and templates, refer to the Station Quality Manual (SQM), Section 3.2.

For immediate response procedures in case of incidents, refer also to Section 6.5.2/6.5.3 of the Ground Operations Manual (GOM), which complements the SMS risk assessment process with specific frontline actions.

For handling of dangerous goods incidents, refer to GOM Section 6.5 and ensure relevant training as outlined in TPM Part 2.6 & 2.7 (Dangerous Goods Training & Assessment).

For further guidance on threat-based risk evaluation and control from a security perspective, refer to Sections 2.9–2.11 of the DHS Aviation Security Manual (ASM).

For practical guidance on hazard identification and the risk assessment process, including scoring methods and templates, refer to Sections 5 and 5.1 of the DHS Health & Safety Manual.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

1.3. CHANGE MANAGEMENT

An effective change management process supports the business in understanding and controlling the exposure to existing or new hazards in order to ensure the overall risk to the operation is handled in an efficient and effective manner. Whether it is the introduction of a new airline or handling contract, implementation of a new DCS or operational system, new station start-up or external changes such as new regulatory requirements, the change management process should document the steps taken to ensure that all changes are formally described, adequately reviewed for their operational impact, assessed, and coordinated in line with other business needs. This ensures risks are mitigated or controlled as far as is reasonably practicable.

An ineffective change management process can present significant and detrimental risks to the business. By operating an effective system, DHS ensures such risks are mitigated and supports the entire safety management system. This requires adequate skills, resources, time, and risk management. Regardless of the nature of the change, the following minimum standards are expected when submitting a robust change plan:

• Be clear on the full context and scope of the change required to implement it
• Conduct an appropriate risk assessment and identify how those risks will be managed or mitigated
• Be clear on who you need to communicate the change to and when
• Where applicable, move changes from a development to test to production environment in a controlled manner
• Have recorded test results in place prior to implementing to production
• Have an immediate plan in place for validating the change and ensuring system or process functionality
• The Change Management Process Owner and the Change Management Team are responsible for the operation of the process
• All changes made to any component of the infrastructure or service within the scope of DHS's responsibility must be supported by a Change Record.

When to Apply MOC

- The Management of Change (MOC) process must be initiated when a change has the potential to impact safety, compliance, or operational stability. Typical examples include:

- Introduction of a new airline or handling contract

- Implementation of a new DCS or operational system

- Changes to ground handling procedures or regulatory requirements

- Major personnel or responsibility changes

- External influences (e.g. construction, airport layout changes)

MOC Process – Step-by-Step

1. Identify the change
   – What is changing and why?

– Who or what is affected?

2. Risk assessment
   – Could the change impact safety, compliance, or operations?
   – If yes, what are the potential risks and how can they be mitigated?
   – Risk assessments are documented and stored on shared drive.

3. Communication and planning
   – Who needs to be informed or trained?
   – Are briefings, documentation updates or SOP/LOP changes required?

4. Implementation
   – Execute the change as planned
   – Ensure responsible persons follow through

5. Validation
   – Verify if the change works as intended
   – Evaluate if risk controls are effective

The validation step involves verifying that the implemented changes meet defined success criteria (e.g., KPIs, operational tests). Validation results, including any necessary corrective actions, are documented in the Change Record. The Responsible Person for Closure indicated in the Change Record ensures proper validation documentation.

6. Documentation

- Change Record must be completed (Word/PDF)

- A DHS MOC Checklist must be used to identify all relevant aspects of the change

- A Risk Assessment must be conducted and documented to evaluate potential hazards and mitigation strategies

- All actions must be tracked via the DHS Action Tracker (Excel sheet)

- All documentation (Checklist, Risk Assessment, Change Record, Action Tracker) must be stored on shared drive

Responsibilities

To support consistency and thoroughness in the MOC process, DHS uses the document "**DHS MOC Checklist**" as an initial tool to identify all relevant operational, safety, and compliance aspects of a planned change. Based on this, a **Risk Assessment** is carried out to evaluate potential hazards and mitigation strategies. All identified actions are tracked via the **DHS Action Tracker** (Excel sheet), and the overall process is documented using a **Change Record** (Word or PDF template).

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

Tool	Function	Responsibility
• MOC Checklist	• Identification & structuring of the proposed change	• Station Manager
• Risk Assessment	• Evaluation of potential hazards & definition of mitigations	• Risk Assessor
• Action Tracker	• Monitoring of actions & responsibilities	• All stakeholders involved in the change
• Change Record	• Final documentation of the overall MOC process	• Quality Compliance Manager

This structured approach ensures that every change follows a traceable process from initial review to closure, while remaining lean and adaptable to operational needs.

The Station Manager is responsible for ensuring the MOC process is followed. Depending on the type and scope of the change, support may be provided by the Quality Compliance Department or other operational leadership.

The Risk Assessor is appointed by the Station Manager and is typically an experienced supervisor, manager, or employee familiar with the processes involved. For complex changes, support and validation of the risk assessment should be provided by the Quality Compliance Manager.

Approach to Implementation

The Management of Change process at DHS is designed to be lean, practical, and adaptable to operational realities. It ensures that safety and compliance are maintained during change without unnecessary administrative complexity. The structured yet flexible approach supports operational continuity and promotes a proactive safety culture. In case of uncertainty regarding the applicability of MOC, the Quality Compliance Manager should be consulted.

1.4. SAFETY DATA COLLECTION

Throughout the network, a combination of reactive, proactive and predictive methods are utilized to gather data regarding safety. This is an ongoing process wherever there is a potential for hazards that could affect operation. The main purpose of all safety data is for the continuous improvement of our SMS, the analysis and actions taken via management reviews to address all safety issues identified through our reporting systems. Subject to local regulatory authorities, mandatory occurrence reporting may be required to be submitted to state civil aviation authorities. The

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

typical processes for identifying existing hazards and predicting new hazards are reviewed through a number of means, including;

- ▶ Occurrence Reporting and Investigation module; records Aircraft Incidents, Personal Injury,
- ▶ Security Incidents, Property Damage, Environmental Incidents and Near Miss/Hazard events;
- ▶ Safety Culture App: records Inspections carried out at business units; Independent internal audits carried out at business units.

Data from the applications are then used and discussed at:

- ▶ Regular Station Team Meetings
- ▶ Monthly Regional Management Operational & Performance Review Meetings

1.5. MANAGEMENT REVIEW

Management review is a necessary element of a well-managed company and provides a process through which organizational control and continuous improvement of the SMS can be delivered. To be effective, a formal management review i.e. meeting of senior executives takes place on a regular basis, but typically not less than a minimum of once per month.

Monthly Management Review Meetings and responsibilities are further detailed in the SQM, Section 2.1, including mandatory participants and agenda structure.

Safety Performance Indicators (SPIs), incident trends and corrective action status are reviewed using the Incident Management Dashboard.

1.6. STATION MANAGEMENT

Station Management shall minute their review meetings to ensure a general assessment of the SMS is carried out to ensure all defined elements in this manual are functioning effectively. The review also includes an assessment of operational performance to ensure the management system is producing the desired operational safety, security and quality outcomes.

1.7. INTEGRATED RISK MANAGEMENT SYSTEM

DHS promotes a safety culture to ensure that in all our operations, safety & security comes first. We promote an "Open Reporting" culture, where all employees are responsible to report any hazards, accident or incident and near misses to their manager. To encourage reporting of incidents and near misses we follow a strict "fair and just policy". The incident reporting system Safety Culture is vital for maintaining operational safety. It allows for Real Time reporting which in turn provides alerts and emails following an incident being reported, even anonymous possible.

The benefits of this include:

- ▶ Online tracking of incidents

- ▶ Effective Investigations – email reminders
- ▶ Quickly identify trends
- ▶ Each initial Safety report is reviewed

2 SAFETY ASSURANCE

2.1. MONITORING SAFETY

DHS makes use of the Safety Culture app to undertake random inspections of ist operations.

Safety Culture provides a mobile, paperless solution that allows quality to be measured. Furthermore, it allows for consistent inspections on a daily basis that provide data/dashboards in real time.

Performance is analysed by business units in monthly management meetings.

Scheduled Quality Inspections shall be carried out on specified primary areas of company activity. Unscheduled Quality Inspections may also be carried out on any area of the operation to:

- ▶ Comply with applicable regulations and requirements of the customer airline(s);
- ▶ Satisfy stated operational needs;
- ▶ Identify undesirable conditions and areas requiring improvement;
- ▶ Monitor effectiveness of safety, environmental, security & quality controls.

Furthermore, monthly self-assessments and annual interal audits are fundamental for monitoring operations. Data is captured and formulated to show trends and from that, preventative measures can be developed in order to reduce the threat. By identifying operational weaknesses or poor behaviour at an early stage, allows local, regional and senior managers to develop solutions. Actions are monitored to make sure the threat has a decreasing negative trend. The lower the negative trend, the more effective the action was.

For audit procedures and performance-related oversight, refer to the Station Quality Manual (SQM), Chapter 3.1. Safety Performance Indicators (SPI) are defined in the SMS Manual, Chapter 2.2.

For monitoring of compliance and audit requirements in the security domain, refer to Sections 15.1 and 15.2 of the DHS ASM.

For IT-related audit procedures and employee participation requirements, refer to Section 4.1 of the DPISP Manual."

For audit types, inspection frequencies, and responsibilities related to workplace safety monitoring, refer to Section 10 of the DHS Health & Safety Manual.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

2.2. SAFETY PERFORMANCE INDICATORS (SPIS): MONTHLY SAFETY PERFORMANCE REPORT

DHS has defined the following Safety Performance Indicators (SPIs) as part of its Safety Management System, in alignment with EASA and ICAO guidance. These indicators are used to evaluate the effectiveness of the SMS, support safety promotion, and track trends in operational risk and culture:

SPI	Name	Target	Why it matters
1	Safety Reports per 1,000 Flights	≥10% more than previous year	Strong leading indicator – promotes active reporting
2	Personal Injury Rate	≤10% less than previous year	Tracks real safety outcomes for staff
3	Near Miss Reports per 1,000 Flights	≥10% more than previous year	Measures proactive reporting & engagement
4	Incident Investigations Closed within 7 Days	≥90%	Reflects SMS process efficiency & discipline
5	Incident Reports with Root Cause Identified	≥90%	Drives system-level learning & improvement

A monthly Safety Performance Report is generated from the SafetyCulture system and circulated by Quality Management (QM) to the CEO, Station Management (SM), Team Management (TM), and Safety/Security Managers (if applicable). The report outlines performance against predefined Safety Performance Indicators (SPIs) for each DHS station.

Performance against the above is reviewed during Monthly Management Performance Review Meetings. Stations with substandard results are expected to provide explanations and outline corrective actions. Positive performance trends may be shared as best practice.

Monthly Management Review Meetings and responsibilities are further detailed in the SQM, Section 2.1, including mandatory participants and agenda structure.

For information on related KPIs and internal audit performance indicators, refer to the Station Quality Manual (SQM), Section 3.1.6 and KPI overview.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

2.3. SAFETY PERFORMANCE MONITORING & INCIDENT DASHBOARDS

Safety Performance Indicators (SPIs) are monitored on a continuous basis to assess safety trends, reporting behaviour, and the effectiveness of the Safety Management System (SMS).

SPI data and incident information are analysed using the **Incident Management Dashboard**, which provides a consolidated overview of:

- reported incidents and near misses,
- trends over time,
- incident categories and types,
- direct causes and root cause categories,
- investigation status and timelines,
- corrective actions, responsibilities, and closure status.

Incident numbers are interpreted as indicators of **reporting activity and risk exposure**, not as a measure of individual or station performance, in line with DHS Just Culture principles.

The focus of SPI monitoring is placed on:

- recurring patterns and systemic issues,
- effectiveness and timeliness of investigations,
- quality of root cause identification,
- completion and effectiveness of corrective actions.

SPI trends and incident analysis results are reviewed by management on a regular basis and are used as input for safety risk assessment, management review, and continuous improvement of the SMS.

3 SAFETY PROMOTION

3.1. TRAINING AND EDUCATION

SMS training is an element of the Safety Promotion component of the SMS framework. An SMS training is performed for all staff and appropriate to the individual's responsibilities and involvement in the SMS.

The SMS training program curricula addresses the following:

- Organizational safety policies,
- goals and objectives;
- Health and Safety Policy Occurrence Reporting
- Organizational safety roles and responsibilities related to safety;
- Safety Roles and Responsibilities
  - Fair and Just Reporting Culture Policy
  - Health and Safety Training

- Procedures for Safe Conduct of Operations
- Human Factors Program
- Basic safety risk management principles;
- Risk Assessment
- Reporting and Investigation
- Safety Monitoring
- Safety Promotion

For SMS training execution, documentation, and refresher requirements, refer to the Station Quality Manual (SQM), Section 5.4.

All employees involved in emergency roles must receive regular ERP training. Refer to the ERP Manual, Section 1 for training expectations and Section 3.18 for return to normal operations.

Training and competence requirements are defined in detail in the DHS Training Policy Manual (TPM), including trainer qualifications, training types (initial, recurrent, requalification), and assessment methods (TPM Sections 0.3, 3, 4, and 5).

All SMS-related training modules, including "Introduction to Safety Management Systems" and "Human Factors," are defined in TPM Section 2.1.4 and 2.1.5. For emergency training, refer to TPM Section 2.3.1.

Only qualified trainers certified according to TPM standards (e.g. Train-the-Trainer) may deliver formal training sessions.

For audit-proof training documentation and storage requirements, refer to TPM Section 5.

For training requirements related to security awareness, operational staff, and audit-proof documentation, refer to Sections 3.3, 3.5 and 3.6 of the DHS ASM.

For mandatory cybersecurity training, phishing prevention and staff awareness measures, refer to Sections 3.1 and 3.2 of the DPISP Manual.

For legal requirements, content structure, and documentation expectations for health and safety training, refer to Sections 6 and 6.2 of the DHS Health & Safety Manual.

3.2. SAFETY COMMUNICATION

To further support safety promotion at station level, the following forums and tools are used to disseminate safety-related information to appropriate employees.
This provides a vital link between management and front-line employees and is a fundamental part of maintaining a positive safety culture.
It ensures continuous awareness of the SMS, current operational safety topics, and compliance with applicable regulatory and airline requirements.

- Monthly **SafeUp! Memos** published via **Read & Sign**
- **SafeUp! Posters** linked to current risks, observations & incidents, published via **Read & Sign** and physically displayed in staff areas
- **Airline and airport safety communication** (e.g., notices, alerts) distributed via **Read & Sign** to ensure timely and traceable dissemination

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

- **Shift-based briefings** by Supervisors to address current safety topics
- Use of internally produced **SafeUp! Videos**, supplemented by selected public aviation safety content (e.g., YouTube)
- Monthly **Management Review Meetings** and **Station Meetings** to reflect on recent incidents, observations, and safety trends
- Local **WhatsApp groups** used as real-time channels for urgent or relevant safety updates
- **Cross-station/shared learning**: Incidents at one station are shared across the network to raise awareness and encourage prevention
- *Implementation of a **'Safety Message of the Day'** on the **Avbis dashboard** for daily login visibility (implementation planned August 2025)*

For communication channels such as team briefs, bulletins, and Health & Safety Committees, refer to Sections 4, 4.1 and 4.2 of the DHS Health & Safety Manual.

4 EMERGENCY PREPAREDNESS & RESPONSE

DHS is committed to ensuring a state of readiness in case of serious incidents or emergencies that may affect operations, employees, customers, or the wider public. While the SMS Manual defines proactive and reactive safety management principles, the dedicated Emergency Response Procedures Manual (ERP) outlines how to respond effectively and professionally in high-impact situations.

The ERP Manual covers emergency types such as aircraft accidents, bomb threats, natural disasters, severe operational disruptions, and health alerts. It provides detailed instructions on:
– The activation and roles of the Local Incident Coordination Centre (LICC)
– Notification and communication procedures
– Passenger and crew handling
– Evidence protection and investigation interfaces
– Coordination with client airlines, airport authorities, and police
– Return to normal operations

DHS stations are required to maintain up-to-date Local Contingency Plans (LCP) and Business Continuity Plans (BCP), aligned with the ERP Manual and local authority expectations.

All employees must be aware of their roles and responsibilities in case of an emergency. Initial and recurrent training on emergency procedures is mandatory and must include at least one joint exercise per year.

For full guidance, refer to the DHS ERP Manual, especially Sections 1, 3.8–3.19, 10 (BCP), and 11 (LCP).

Local emergency coordination and the structure of the Local Contingency Plan (LCP) are further explained in the Station Quality Manual (SQM), Section 3.6.

All employees assigned emergency-related roles must receive specific Emergency Response Training. For detailed training objectives, refresher

intervals, and exercise requirements, refer to the DHS Training Policy Manual (TPM), Section 2.3.1.

For emergency procedures specific to security threats or prohibited articles, refer to Chapter 14 of the DHS ASM.

For requirements related to PPE use and fatigue prevention as part of emergency readiness, refer to Sections 8.3 and 8.4 of the DHS Health & Safety Manual.

5 CONTRACTORS, SUB-CONTRACTORS & VISITORS

Policy

All Managers or DHS Representatives responsible for employing 'contractors and/or sub-contractors' must ensure that safe and secure systems of work have been agreed before any work or service commences. DHS has a responsibility to ensure the safety and security of all contractors and sub-contractors operating within their own facilities or providing sub-contracted services to their customers. It also has a duty to ensure the safety and security performance and compliance of contractors and/or sub-contractors is monitored.

Responsibility

It shall be the responsibility of the Station Manager to ensure the following procedure is applied.

Policy

The DHS Representative/Station Manager is responsible for ensuring the safety and security policies are adhered to at all times and arrangements are in place to ensure effective oversight of standards.

Organisation

A formal contract must be organised between DHS and the contractors and/or sub-contractors and clear lines of communication and authority must be established.

Planning and action

Practical arrangements, including risk assessments, method statements, incident / accident reporting, safe systems of working and inspection arrangements, including adequate liability insurance must be established with each contractor and/or sub-contractor before any work or service commences.

Monitoring

The DHS Representative/Station Manager must keep a check on the progress of the contract and immediately raise any concerns relating to the safety & security performance with the contractor and/or sub-contractor management.

Review

The contract or sub-contractor performance must be reviewed on a regular basis and improvements made as required.

Audit

A periodic audit of how contractors and/or sub-contractors management and compliance of health, safety and security should be carried out by station or regional auditors or management.

Company requirements

Any manager or DHS Representative who employs, or is responsible for, Contractors or sub-contractors must ensure that:

1. Their department has arrangements and written procedures in place regarding the management of Contractors or sub-contractors. The work required must be defined and planned.

2. The Contractor and/or sub-contractor have provided a copy of their safety & security policies and procedures before appointment.

3. A Contractor and/or sub-contractor should only be employed if they are competent and skilled in the work required.

4. A risk assessment of any work to be carried out has been completed and agreed prior to any work commencing. Any Permit to Work requirements must be identified.

5. All Contractor and/or sub-contractor must have a safety & security briefing, which includes any specific risks related to the area in which they will be working.

6. All contractors and/or sub-contractor have been instructed to report all incidents/accidents to DHS and their own company.

7. DHS staff and visitors have been protected from the Contractor's activities within their facilities and working areas.

8. Any DHS or Contractor and/or sub-contractors plant and equipment are suitable, designed for purpose and safe and that anyone using it is trained and competent to do so.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026

9. The Contractor and/or sub-contractor must carry out inspections of their worksite and services and keep copies of the inspection reports for inspection

10. Good communication lines and a regular review process must be established between the manager and the contractor and/or sub-contractor and any other parties affected by the contractor's work for the duration of the contract.

11. Any special arrangements required have been identified and a contact number for the DHS Representative is available where sub-contracted services are provided to a 3rd party carrier.

12. All staff that may come into contact or maybe affected by a contractor's and/or sub-contractor work must be informed prior to the work commencing.

Stopping work in the event of serious or imminent danger

Managers and staff are authorised to stop any work by Contractors and/or sub-contractors if they are of the opinion that continued working would present a risk to the health, safety and security of any person or company to which these services are being provided.

Records

Records shall be stored locally at the station/facility and maintained so that they are readily retrievable for inspection and in a suitable environment to minimise deterioration or damage.

For additional guidance on third-party contractor responsibilities and compliance with security protocols, refer to Section 2.6 of the DHS ASM.

Controlled document. Controlled version on AVBIS/DHS Manuals.
Printed/downloaded copies uncontrolled.

DHS-SMS-001 V2R2_20.02.2026