

4.3 NON-PUNITIVE REPORTING POLICY

“GEO Sky” is committed to the safest flight operating standards possible. To achieve this goal, it is imperative to have uninhibited reporting of all accidents, incidents, occurrence, hazards, risks and other information that may compromise the safe conduct of our operations.

To this end, every employee is responsible for communicating any information that may affect the integrity of flight safety.

A person shall not be held liable for an aviation event in which he was a participant, if the aviation event became known on his own notification, except in cases where there was an intentional or negligent violation.

Geo Sky ensures that the employees who report the aviation incident will not be penalized for providing the notification to the airline.

Geo Sky will not apply the measure of responsibility in case of pre-inadvertent violation of the rules, which became known to it through the aviation event notification system, except for cases caused by gross negligence and/or intentional violation.

Airline employees may report alleged violations of the requirements set forth in this article to the GCAA or appeal the actions of the airline's management in court in accordance with labor legislation.

Such communication must be completely free of any form of reprisal. The main purpose of reporting is risk control and accident and incident prevention, not the attribution of blame. No action will be taken against any staff member who discloses a safety concern through the reporting system, unless such disclosure reveals, beyond any reasonable doubt, an illegal act, gross negligence, or a deliberate or willful disregard of regulations or procedures.

This policy shall not apply to information received by the Company from a source other than the employee, or which involves an illegal act, or a deliberate or willful disregard of promulgated regulations or procedures.

The Safety Reporting Policy states that the purpose of safety reporting and internal investigations is to improve safety, not to apportion blame to individuals. To this purpose, the last bullet of the Safety Policy can be expanded in a separate statement, called Protection of the Reporters.