



Just Culture Policy

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1. INTRODUCTION

Safety of air operations is the top priority, and is therefore a primary commitment for ENAIRe and of maximum interest to all air transport users, the company, as well as its entire workforce. Mistakes and failures in any system are generally the result of the system's design, human error and individual decisions when interacting with that system. It is therefore important that any event that may affect or has affected safety be fully and freely reported. The purpose of this reporting is to establish the facts and identify any causal or contributing factors that could have led to it, and thus prevent a future reoccurrence: the aim is not to assign blame or liability.

2. PURPOSE AND SCOPE

The Just Culture Policy aims to include each of the key principles of Just Culture required by the relevant European and national regulations, as well as those recommended by leading organisations in the field of civil aviation, CANSO and Eurocontrol, and the main air navigation service providers both in Europe and the rest of the world.

ENAIRe defines a Just Culture as one in which staff are not punished for their actions, omissions or decisions when they are consistent with their experience and training, although wilful misconduct, gross negligence, intentional infringements and destructive acts are not tolerated.

It comprises the commitment undertaken by ENAIRe to encourage reporting amongst the entire staff of the organisation, with the aim of building an atmosphere of trust in which people can provide essential information, based on the non-punitive concept, to the benefit of everyone.

3. OPERATING PRINCIPLES AND COMMITMENTS

ENAIRe is fully involved in and committed to the continuous improvement of safety, and it endorses the reporting of incidents, committing to:

- Report all those events that pose a risk to safety as soon as possible, including those in which an error has been made, using the reporting procedures or systems defined and/or approved by the company.
- Objectively and confidentially investigate events that may have an impact on safety in those cases in which company personnel have made repeated mistakes, from a dual perspective: individual and organisational.
- Differentiate between mistakes resulting from a human or systemic failure and conscientious and deliberate actions that violate the rules and procedures established by the organisation or the instructions provided.
- Ensure that no disciplinary actions are taken against workers who report events that pose a risk to safety in which they are involved, or those that are known through an automated system for detecting safety incidents (principle of non-punishment), when these events do not stem from malicious or negligent actions, or when there is no proven serious negligence.

- **Only take disciplinary action** in those situations where the findings of the investigation show that deliberate and intentional **misconduct or non-compliance has been committed, and that the actions, omissions or decisions of the worker** in question were not consistent with their training, responsibility and experience, or are proven to be the result of working under the influence of psychoactive substances.
- **Accept that**, after the occurrence of an event that could have an effect on safety, **it may be necessary to take precautionary measures**, such as verifying the competency, providing extraordinary training, and as a last recourse, removal from the job, if necessary, by applying the measures laid out in the Collective Agreements and in the procedures of the Organization.
- **Learn with each incident** by identifying the causes that led up to it, implementing strategies to reinforce our systems and prevent a reoccurrence.
- **Disseminate lessons learned** from the analysis of incidents to achieve a safer and more informed organisation.
- **Properly manage the stress** created by traumatic situations by implementing a critical incident stress management programme (**CISM**).

4. MONITORING MECHANISMS

Management has established the strategic lines to ensure that these commitments materialise into actions and results, and undertakes to make available the resources needed to provide our services while managing economic resources with efficiency criteria.

The Management Committee will oversee the promotion and implementation of this Policy, and inform the Governing Board of its progress, where relevant, in accordance with the processes established for its review as part of the Integrated Management System.

5. DISCLOSURE AND DISSEMINATION

This Policy is supported by Senior Management and is kept as substantiated information.

This Policy will be made available to all stakeholders on ENAIRE's [website](#) for their information and consultation.

Similarly, it will be suitably communicated and **disseminated** internally using existing tools to ensure it is understood and applied within the organisation, thus confirming ENAIRE's **commitment** to our staff, to development and **progress** in order to guarantee the future of aviation and Spanish society, promoting its dissemination so it is understood by all the **people** who act on behalf of ENAIRE.

6. APPROVAL AND VALIDITY

The Just Culture Policy was initially approved in November 2015 by ENAIRE's CEO, after being presented to the Management Committee and with the support of trade unions and professional associations.

The Just Culture Policy is updated and submitted for approval to ENAIRE's highest governing body and adapted to ENAIRE's new policy template.

Following its presentation to the Management Committee on 15 March 2023, this Policy was approved by ENAIRE's Governing Board at its meeting of 27 March 2023, coming into force on that date. It shall remain in force until amendments are made to the Policy, which will be properly communicated.

This Policy is subject to review and updating as needed to adapt it to any regulatory, social, economic or organisational changes.