



FATIGUE RISK MANAGEMENT PROGRAM

FOR FLIGHT ATTENDANTS

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1. GENERAL:

Envoy Air Inc., (Company) is operated under Title 14 CFR, Parts 119.21, 121, and 117 engaged in Scheduled Air Carrier Operations. The Flight Attendants are represented by the Association of Flight Attendants-CWA (AFA)

2. PURPOSE:

Envoy is committed to improving flight safety by reducing fatigue. Each party has determined that safety will be enhanced if there were a systematic approach to properly identify and correct fatigue hazards. The primary purpose of the Fatigue Risk Management Program (FRMP) is to identify fatigue hazards, and to implement corrective measures to improve system safety. In order to facilitate safety analysis and corrective action, Envoy has implemented an FRMP for Flight Attendants, which is intended to improve safety through self-reporting, cooperative follow-up, and appropriate corrective action. This Fatigue Risk Management Program (FRMP) describes the provisions of the program.

3. METHODOLOGY:

This Fatigue Risk Management Program (FRMP) is based on well-established peer-reviewed scientific research on sleep, alertness, circadian and fatigue physiology, and utilizes a data-driven process to assess fatigue risk, evaluate potential fatigue countermeasures and to assess overall fatigue management. Envoy will use fatigue risk assessment and countermeasure tools to determine root cause, measure, assess and mitigate the risks associated with aircrew fatigue at five critical levels of risk:

1. Education and Training
2. Workplace Environment
3. Monitoring of Fatigue-Related Behavior
4. Fatigue Risk Analysis of Fatigue Reports, Errors and Deviations
5. Fatigue Risk Analysis of Incidents and Injuries

4. JUST CULTURE:

Envoy is committed to proactively measure, mitigate and manage the risks associated with fatigue. Through the FRMP, the Company will provide a mechanism by which appropriate measures, supporting procedures and training, to ensure employees are not subjected to unacceptable levels of work related fatigue. Employees have an obligation to minimize fatigue so that they must report to work fit for duty, and shall not perform any duty if they consider their fatigue level to be unsafe. Envoy will ensure that employees who report excessive fatigues will be protected individually, confidentially and treated in a non-punitive manner, in accordance with Envoy's just reporting culture.

The non-punitive nature of these reports is subject to limitations that exclude the following:

1. Must not involve intentional disregard for safety
2. Must not involve intentional violation of regulations
3. Must not involve criminal activity
4. Must not involve substance abuse
5. Must not have been intentionally falsified

Information revealing the identity of any employee, who files any Fatigue Report, will not be disclosed to an outside party, unless agreed to by the employee, or required by law.

5. SAFETY MANAGEMENT SYSTEM / OPEN REPORTING POLICY:

An open reporting policy stems from Envoy's Safety Management System, SMS. An SMS is an organization-wide comprehensive and preventive approach to managing safety. An SMS includes a safety policy, formal methods for identifying hazards and mitigating risk, and promotion of a positive safety culture. An SMS also provides assurance of the overall safety performance of our organization. An SMS was designed and developed by Envoy, and is integrated into our existing operations and Fatigue processes. The SMS assists Envoy's leadership, management teams, and employees in making effective and informed safety decisions.

The open involvement of every flight crew member to participate in the company's various safety related programs is encouraged. The accuracy and reliability of fatigue-related data and

the identification of root causes of fatigue impairment depends on the participation and candor of individual flight crew members. Thus, reporting of personal information by aircrew concerning their personal sleep patterns and fatigue levels and any potential contributory causes of their personal fatigue, will be protected by individual confidentiality and treated in a non-punitive manner. This information will be gathered through a stand-alone web based system to enhance the analysis process and to aid in ensuring this information is handled appropriately.

6. BENEFITS:

The program will foster a cooperative, non-punitive environment for the open reporting of fatigue events. Through such reporting, all parties will have access to valuable safety information that may not otherwise be obtainable. This information will be analyzed in order to develop corrective action to help alleviate, or if possible, eliminate the causes of fatigue.

7. APPLICABILITY:

The FRMP applies to all Flight Attendants employed of Envoy Air Inc. The FRMP does not cover fatigue calls to a required Training Event or Deadhead Flights to a Rest Period.

8. RESPONSIBILITY:

Mitigating fatigue risk is the joint responsibility of both Company management and individual Flight Attendants. The Company is responsible for scheduling crewmembers in compliance with Federal Aviation Regulations pertaining to Flight Duty Time Limitations. The Company is also responsible for providing the opportunity for adequate rest as well as a means for Flight Attendants to remove themselves from duty when adequate rest was not possible or when fatigue will negatively affect their performance.

9. SCOPE AND OBJECTIVES:

Flight Attendant fatigue risk is an ever-present challenge in flight operations. Envoy is committed to manage and mitigate effectively to protect the safety and health of our employees and customers.

Mitigating Flight Attendant fatigue is the primary goal of our Safety Management Systems by identifying potential risk. Identifying risk is a joint responsibility of every manager responsible for functions that impact Flight Attendant fatigue, and every Flight Attendant. To address this risk, Envoy will develop, and maintain through a continuous improvement process, a comprehensive Fatigue Risk Management Program (FRMP) for Flight Attendants, that is designed to help ensure that all Flight Attendants are alert and fit for duty.

10. POLICY AND PROCEDURES ADEQUATE TO MANAGE/MITIGATE:

The accuracy and reliability of fatigue-related data and the identification of root causes of fatigue impairment depends on the participation and candor of individual Flight Attendants. Thus, reporting of personal information by Flight Attendants concerning their personal sleep patterns and fatigue levels, and any potential contributory causes of their personal fatigue, will be protected by individual confidentiality and treated in a non-punitive manner. This information will be gathered through a stand-alone web-based system (WBAT) with relative categories to enhance the analysis process.

The effectiveness of the FRMP depends on an ongoing commitment by Envoy and Envoy's Safety Management System, to progressively implement and continuously improve the FRMP. The Company's policy letter on Flight Attendant Fatigue and an explanation of this program's process will be incorporated in the Envoy Inflight Procedures Manual for review by each Flight Attendant. A Fatigue Review Committee (FRC) will convene no less than once per quarter (holidays permitting), more often if necessary, to discuss and review the data for analysis. Appropriate recommendations will be made to management regarding any concerns or issues. While the overall responsibility of the Flight Risk Management Program (FRMP) resides with the Vice President Safety, Security & Environmental (14 CFR, 119.65 Director of Safety), the authority to maintain the program in accordance with this Program is given to the Manager Flight Safety.

Envoy has determined that safety would be enhanced if there were a systematic program that gathers the data, analyzes the trends and strives to eliminate or mitigate, to acceptable levels, Flight Attendant fatigue. The primary purpose of the program is to reduce the risks of Flight Attendant fatigue and improve alertness through the implementation of Safety Risk Management and Safety Assurance, key elements of our Safety Management Systems. Utilizing the tools and procedures outlined within this document, and the Safety Manual will assist in ensuring an overall safer airline system.

11. FATIGUE REPORTING SYSTEM:

The fitness for duty of any person in a critical safety sensitive position at Envoy is ultimately the responsibility of the individual, their peers, and their supervisors. Flight Attendants must use the self-assessment tools learned in both initial and recurrent training to determine their individual fitness for duty.

In addition, all flight crew members are responsible for monitoring others they are working with for signs of impairment due to fatigue. Supervisors must understand and take appropriate measures to assess, report, and mitigate fatigue in all flight crew members. The Company recognizes the dangers associated with Flight Attendant fatigue and will not permit pressure to accept or continue an assignment, or impose adverse consequences or repercussions when a Flight Attendant removes himself or herself from duty due to fatigue, unless a pattern of abuse is determined.

Reporting of personal information by Flight Attendants concerning their personal sleep patterns and fatigue levels, and any contributory causes of their personal fatigue, is imperative and is protected by individual confidentiality within this FRMP process.

12. REPORT AND DATA COLLECTION USED FOR DEVELOPMENT OF NEW FATIGUE STRATEGIES:

A process for reviewing and analyzing the fatigue data will be consistently conducted and evaluated for any new and amended strategies that could mitigate Flight Attendant fatigue.

13. FRMP DURATION:

The FRMP is a continuing program at Envoy.

14. FATIGUE REVIEW COMMITTEE (FRC):

The FRC will be comprised of three members, two of whom shall be Company representatives (one each from Inflight Management and the Safety Departments) and one of whom shall be an AFA Safety Committee representative. The Director of System Safety, or his proxy, participates as the FRC Lead for administrative purposes and may also act as the Safety Department representative.

Members of the FRC may designate other members from their respective department or committee to serve as a proxy in their absence. Additionally, the FRC may consult with mutually agreed upon Subject Matter Experts (SMEs) to aid in the analysis of fatigue reports.

All three members (or their proxy) must be present to conduct an FRC meeting. Meetings will be conducted face-to-face and in a location mutually agreed upon by all parties. Conference call or teleconferencing shall only be permitted in mutually agreed upon situations. A mutually agreeable teleconference product shall be used for all teleconferences.

- **Consensus of the FRC.** The success of an FRMP is built on the ability of the FRC to achieve consensus on each event that is reported. Consensus of the FRC means the voluntary agreement of all representatives of the FRC.

The FRC shall reach a consensus when deciding whether a report is accepted into the program and when deciding on corrective action recommendations arising from the event. It does not require that all members believe that a particular decision or recommendation is the most desirable solution, but that the result falls within each member's range of acceptable solutions for that event in the best interest of safety. In order for this concept to work effectively, the FRC representatives must be empowered to make decisions within the context of the discussions on a given report. Senior management, supervisors, nor AFA should preempt their respective FRC representative's decision-making discretion for a reported event.

- **Fatigue Database Access.** Access to WBAT or a similar database tool, allowing for viewing of submitted Fatigue Reports, shall only be available to FRC members, Fatigue Analysts, and pertinent Safety Department personnel.

15. FRC MEETINGS:

The FRC will meet at least once per quarter. The frequency of meetings may be increased due to demand and will be coordinated by the Director of System Safety. Meeting functions will include root cause analysis, report categorization, trend analysis, corrective actions, and recommendations. The Director of System Safety, in consultation with the other FRC members, will coordinate the time and place of the meetings.

16. FATIGUE REPORTING:

A Flight Attendant shall immediately inform Crew Scheduling should they reach a level of fatigue, or believe they will reach a level of fatigue that would prohibit the accomplishment of a duty assignment, or portion thereof.

Flight Attendants shall work with Crew Scheduling to find alternative assignments if practical. Fatigue may be realized through self-assessment or that of a fellow Flight Crewmember. Recognizing useful rest as the only remedy for fatigue, Crew Scheduling shall immediately release the Flight Attendant from subsequent duty obligations to the point necessary for the Flight Attendant to recover from fatigue. Total rest duration for a fatigue related event will be 10 hours. Each time a Flight Attendant calls off fatigued, they must submit a Fatigue Report, with sufficient detail, via the reporting system. The report must be completed within the greater of the two following time constraints:

- 72 hours from the time the fatigue event was reported to Crew Scheduling.
- 48 hours after the conclusion of a trip pairing into a day off, in the base in which the pairing began.

17. EXCLUSION CRITERIA:

Reports of events involving criminal activity, substance abuse, controlled substances, alcohol, intentional falsification, or willful misconduct shall be excluded. Additionally, any report that does not meet the reporting timeline criteria or is the direct result of crewmember or immediate family member illness/injury shall be excluded. Physical symptoms of fatigue shall be considered before exclusion. The FRC may accept reports beyond the filing timeline due to extenuating circumstances.

The report will be audited for causal factors, a response will be issued to the submitter, and Corrective Actions may be recommended based on the report.

No submitter narratives or recommendations by the FRC involved in the fatigue analysis review process may be used in whole or in part in any disciplinary process or proceeding, or referenced in any counseling or employment record, not outlined in this agreement. Information exclusively contained in a fatigue report, including all correspondence via WBAT, may not be used in any manner injurious to the submitter, outside of the FRMP.

18. FRC DUTIES & RESPONSIBILITIES:

All relevant information to the event including but not limited to scheduled trip sequence, revised sequence(s), delays, duty lengths, rest periods, commuting and communications is gathered and reviewed by the FRC as applicable. The FRC Lead will be ultimately responsible for ensuring access to and documenting all pertinent information to the event. Further, the FRC investigates actions of the Flight Attendant to obtain rest, subjective and objective evidence of fatigue, relevant health, or medical conditions, specific actions related to the incident, and communications regarding the event. This information is collected through written departmental requests, audio recordings, SABRE/FOS, Flight Attendant interviews, or other pertinent sources. All information will be read and evaluated for fatigue related factors by the committee. The FRC will then determine through consensus the primary root cause and categorize the event as described below. The FRC will audit the Contributing Factors for each report and document these via the WBAT software. The FRC shall provide written feedback to the submitter for all events.

The FRC will review all actions and decide on a final outcome. This may involve peer counseling, additional training, fatigue mitigation strategies, medical evaluation, or no action. The FRC will conduct a quarterly review of aggregate data and mitigations. This review will include trending of reports, report categorization, and top causal factors. The FRC may make Corrective Action Recommendations based off aggregate data information

19. MEDICAL EVALUATION:

Certain conditions are inherently not easily identified through reporting alone. These conditions can manifest themselves in such a way only professional advice, evaluation or services can assist. Should the FRC, through consensus, feel additional services are needed, the FRC may refer an individual Flight Attendant to a person or group. Information obtained from professionals outside of the FRC may be shared with the FRC but will be held to the same confidentiality standards as the reports themselves.

Compliance with, or failure to comply, with recommendations or corrective actions of the FRC will be taken into consideration by the FRC when determining whether or not a pattern of abuse exists.

20. FATIGUE REPORT CATEGORIZATION:

The FRC will categorize each fatigue report into one of the following general categories based on primary root cause analysis:

A. Operational/Company

1. Operational- Operationally Induced reports are those that occur due to factors outside the control of both the Company and the individual (e.g. weather, ATC). Reports will be categorized as Operational if the FRC determines there was no action the Company or the crewmember could have reasonably done to prevent the fatigue event.

2. Company - Company Induced events are those in which the actions or inactions of the Company were a primary factor in inducing the event. Reports will be categorized as Company Induced when the FRC determines that a reasonable action could have been taken by the Company to prevent the event.

B. Personal Controllable – Personal controllable events are those in which the actions or inactions of the individual were a primary factor in inducing the event.

C. Personal Uncontrollable - Personal Uncontrollable events are those in which the primary causal factor could not be planned for, predicted, or prevented by the submitter and occurred while off-duty. These fatigue events could be environmental in nature and shall not penalize the pilot.

21. FRC RECOMMENDATIONS:

The FRC will provide written feedback to all fatigue report submitters. The FRC will strive to reach consensus on the categorization of each reported event, how that event should be addressed, and any recommended corrective action(s) to be taken. The FRC makes recommendations to the FRMP Program Manager. The Program Manager will be responsible to contact the appropriate department heads for corrective actions related to specific and systemic issues. Such FRC recommendations may include, but shall not be limited to matters, related to fatigue educational material and training, pairing and line construction, Crew Scheduling or Crew Planning practices, hotel changes, and crewmember counseling.

22. CORRECTIVE ACTIONS:

The FRC shall document Corrective Actions for tracking and trending purposes. This may be done through the WBAT system or alternate means as appropriate. Each meeting should include a review of any open Corrective Actions as well as status updates on any Corrective Action(s) closed since the previous meeting.

23. FLIGHT ATTENDANT POSITIONING:

When a Flight Attendant calls in fatigued, the Company has the option to dead head him/her in order to position them for their next assignment. The deadhead shall be no more than a single leg and must depart within 2 hours of the fatigue call. If the Flight Attendant requests, the deadhead flight may depart more than 2 hours after the fatigue call. If the Flight Attendant insists they are too fatigued they will be put to rest immediately. This should be extremely rare and thoroughly explained in their fatigue report.

24. FLIGHT TIME & DUTY LIMITATIONS:

- **Block Hour Limits:** Will be in accordance with current Collective Bargaining Agreement or Federal Regulations
- **Duty Time Limitations:** Will be scheduled in accordance with the current Collective Bargaining Agreement or Federal Regulations
- **Work Day/Week Limitations:** Will be in accordance with the current Collective Bargaining Agreement or Federal Regulations

25. FLIGHT ATTENDANT IDENTIFICATION AND CONTACT:

The AFA FRC representative(s) will be responsible for the initial discussion of the fatigue event with the submitter when necessary. As a result of this discussion, or after further FRC discussion, the Flight Attendant may be requested to attend an FRC de-briefing.

If the FRC deems the narrative of the report would reveal HIPPA or personal privacy information those statements will be redacted before sharing.

26. ATTENDANCE AND DEPENDABILITY:

Fatigue reports categorized by the FRC as Operational/Company, or Personal Uncontrollable will not be considered to be an Attendance and/or Dependability event or occurrence. If the FRC determines the primary cause of a report is due to crewmember/immediate family health or illness the report will be excluded from the fatigue program. Excluded events will be directed to the Inflight Management Office for processing.

The result of any FRC investigation and finding resulting in a Fatigue (NF) being placed, or remaining, on the Flight Attendants schedule shall not be considered an attendance occurrence. Envoy is dedicated to the continued success of the airline, and is only possible through the commitment to safety and established trust of the airline's employees.

27. FRC DISPUTES:

Should the FRC fail to obtain a consensus on any matter, the report may be tabled for further discussion at the next meeting. If resolution is not attained, the report will be forwarded to the Director of System Safety who will determine the outcome. It should be noted that occasions in which the FRC fail to reach consensus are expected to be extraordinarily rare.

28. FATIGUE EDUCATION AND AWARENESS TRAINING PROGRAM:

The Fatigue Education and Awareness Training Program will be an educational program that provides the foundation of managing and mitigating fatigue. This program must be completed by each Flight Attendant every 12 months and should be incorporated into recurrent ground school (where possible)

The program will include the following subject areas:

- Basics of fatigue including sleep fundamentals and circadian rhythms
- Causes and awareness of fatigue
- Effects of fatigue relative to performance
- Fatigue countermeasures, prevention, and mitigation
- The influence of lifestyle including nutrition, exercise, and family life, on fatigue
- Familiarity with sleep disorders
- The effects of fatigue as a result of commuting
- Responsibility for ensuring adequate rest and fitness for duty
- The effects of operating through multiple time zones

29. THIRD PARTY FATIGUE CALL

In keeping with the spirit and intent of the Company's position on the safety of the overall flight operation, the FRMP has a process for any employee to report a fatigue concern involving any flight crew member. This process provides for fellow flight crew members to report their concerns as well as other managers or employees directly involved with the operation of the flight.

In cases where any flight crewmember, or other employee directly connected to the flight operation, has reasonable cause to believe that a flight crew member's duties may be impaired due to possible fatigue it is the responsibility of the observing employee to report this incident for further evaluation.

The reporting employee must initiate the process by: Contacting the Company's Crew Scheduler on duty who will:

- a. Remove, delay, or reassign the affected flight crew member's next flight, as necessary, to accommodate the process outlined below.
- b. Contact a management representative, who will personally contact the flight crew member concerned. The concerned flight crew member will be informed of the Third Party Report and have the option of:
 - Removing themselves from their remaining duties by executing a "Self-Fatigue Call" and completing the process in accordance this program, or,
 - Undergoing an on-site fatigue evaluation. Any on-site evaluation will be conducted by the manager/representative and must include a second management personnel and both management representatives must concur before the flight crew member is removed from any pending flight duties for possible fatigue.

During the on-site evaluation both managers should look for, but not limit their observations to the following:

- (a) Significant changes in normal activity level
- (b) Significant deterioration in normal appearance
- (c) Glassy, red or blood-shot eyes
- (d) Slurred speech, or unusually rapid or slow speech
- (e) Appeared lack of balance
- (f) Low level of coordination
- (g) Disoriented behavior
- (j) Difficulty or inability to concentrate
- (k) Drowsiness

30. PROCESS FOR EVALUATING THE FRMP

The (FRC) will provide, through the FRMP custodial Manager, monthly reports to the Flight Safety Board. The reports will provide an overview of the success or recommended modifications of the program. This is expected to be an evolving process as data sources and analyses are progressively implemented. This report may include but will not be limited to:

- a. Assessment of any High Risks
- b. Recommendations made by the FRC to mitigate any risk

- c. Assessment of probable and confirmed correlations between fatigue, fatigue risk, causal factors and errors, deviations, incidents and injuries.
- d. Assessment of the quality of the FRMP process
- e. Assessment of the need for change in the administrative processes of the FRMP.
- f. Lessons learned.

In addition the FRMP will be subject annually to the Company's Internal Evaluation Program (IEP) which is defined in the Company's Safety Manual.

Annually, the FRC will review of the FRMP database with emphasis on determining whether corrective actions have been effective in preventing or reducing the recurrence of fatigue-related events of a similar nature. That review will be presented to the Vice President of Safety and include recommendations for any corrective actions for addressing recurring events indicative of adverse fatigue trends.