Just Culture Policy

The Group practices and applies the principle of Just Culture when investigating and adjudicating disciplinary matters. The following is an explanation of the principle and its application in the NJE Group, which is consistent with the definition promulgated in the **NJE Safety & Quality Manual (NSQM)**.

Just Culture seeks to encourage all Employees to self-report all instances of errors, mistakes, negligence and wrongful/illegal acts/omissions or practices with regard to the Policies of the Group, promulgated operational procedures, approved company manuals and prevailing laws and regulations. Such a culture seeks to uncover all mistakes made so that the Group and Employees can benefit by learning from them, resulting in a safer and more secure environment. Just Culture seeks to move away from a culture solely of blame to a culture of accountability and learning.

During the investigative process on the reported incident, the individual's experience, qualification and training will be taken into consideration when deciding on the level of accountability and/or responsibility.

Just Culture does not absolve culpability and the findings on culpability will not differ whether the matter is self-reported or discovered through other means. However, Just Culture principles may, in most circumstances, lead to a much lighter disciplinary measure taken by the Group when the matter is self-reported. This is similar to the legal/justice system where self-reporting of a crime does not change a court's verdict but will be a strong mitigating factor in the sentencing and can lead to a reduced or suspended sentence.

However, this does not apply to acts of gross negligence, recklessness, and wilful and destructive acts or omissions. Further, the curtailing of an individual's aviation/professional privileges or qualifications until such time that the individual could demonstrate the required competency and/or knowledge is not considered discipline or punishment.

The Group expects and encourages all Employees to self-report all errors, mistakes, negligence and wrongful/illegal acts or practices and commits to responding in a compassionate and supportive manner in accordance to the principles of Just Culture.

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