QRS-01 Appendix 6

Safety Requirements for Suppliers (SRS)

Issue Date: October 2025 **Issue:** 01

CHANGES LOG

Issue	Approval Date	Main Changes	Interested Paragraphs
00	April 2025	First issue	All
01	October 2025	Typo correction. Applicability extended to Suppliers of Critical Parts for LH UK military programs. Supplementary requirements introduced to manage specific exceptions. Safety Policy requirement added. Supplementary requirements chapter added. Kopter-related subchapter i	All 2 7.1.1. 8.1.1. 7.3. 8.3.

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1. PURPOSE

The primary purpose of this procedure is to provide guidelines to LH Suppliers about the Leonardo Safety Requirements.

2. APPLICABILITY

This document is applicable to all Leonardo Helicopter (LH) Suppliers of civil or dual-use Products or Services and Suppliers of Critical Parts for LH UK military programs (i.e., AW101, AW159, Westland Lynx, Westland Sea King). Suppliers of other military or Unmanned Aircraft System (UAS) programs are excluded from the implementation of the Leonardo Safety requirements until formal Regulatory Requirements are established by the competent Airworthiness Authority.

Leonardo defines two separate set of Safety Requirements, based on the Supplier's obligations to implement the Safety Management System. Also, each set contains supplementary requirements to manage specific exceptions.

2.1. SAFETY REQUIREMENTS FOR SUPPLIERS WITH MANDATORY SMS

Suppliers mandated by their National Airworthiness Authority to implement the SMS and Suppliers that implemented the SMS through National Aviation Authority voluntary programs[1] shall comply with the requirements set forth in § 7.

2.2. SAFETY REQUIREMENTS FOR SUPPLIERS WITHOUT MANDATORY SMS

Suppliers not mandated by their National Airworthiness Authority to implement the SMS and Suppliers which do not implement the SMS on a voluntary basis shall comply with the requirements set forth in § 8.

3. EFFECTIVE DATE

Issue date.

[1] Transitional note: § 2.1 is applicable from the Supplier's Civil Aviation Regulation effective date. During the transition period, § 2.2 is applicable.

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4. ACRONYMS, ABBREVIATIONS, AND DEFINITIONS

4.1. ACRONYMS AND ABBREVIATIONS

AMO	Approved Maintenance Organization
ATO	Approved Training Organization
CAA	Civil Aviation Authority
CAMO	Continuing Airworthiness Management Organization
DMM	Design Manufacturing & Maintenance
DO	Design Organization
DOA	Design Organization Approval
ERP	Emergency Response Planning
FDA	Flight Data Analysis
FDM	Flight Data Monitoring
ICAO	International Civil Aviation Organization
LH	Leonardo Helicopters
LOSA	Line Operations Safety Audit
MOA	Maintenance Organization Approval
ODA	Organization Designation Authorization
PC	Production Certificate
PMA	Parts Manufacturer Approval
PO	Purchase Order
POA	Production Organization Approval
QMS	Quality Management System
SA	Safety Assurance
SAG	Safety Action Group
SARP	Standards and Recommended Practices
SM	Safety Manager
SME	Subject Matter Expert
SMM	Safety Management Manual

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SMS	Safety Management System
SPI	Safety Performance Indicator
SPT	Safety Performance Target
SO	Safety Officer
SRB	Safety Review Board
SRM	Safety Risk Management
SRU	Safety Related Unit
STC	Supplemental Type Certificate
SWG	Safety Working Group
TC	Type Certificate
TCH	Type Certificate Holder
UAS	Unmanned Aircraft System

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4.2. DEFINITIONS

For the purposes of this document, the following definitions shall apply. For any missing definition, refer the Aviation Industry documentation reported in § 5.

Term	Definition	Reference
Accident	An occurrence associated with the operation of an aircraft which, in the case of a manned aircraft, takes place between the time any person boards the aircraft with the intention of flight until such time as all such persons have disembarked, or in the case of an unmanned aircraft, takes place between the time the aircraft is ready to move with the purpose of flight until such time as it comes to rest at the end of the flight and the primary propulsion system is shut down, in which: a) A person is fatally or seriously injured as a result of: a. being in the aircraft, or b. direct contact with any part of the aircraft, including parts which have become detached from the aircraft, or c. direct exposure to jet blast, or b) The aircraft sustains damage or structural failure which: a. adversely affects the structural strength, performance, or flight characteristics of the aircraft, and b. would normally require major repairs or replacement of the affected component, or c) The aircraft is missing or is completely inaccessible.	ICAO Annex 13
Accountability	The responsibility and obligation of individuals within an organization to achieve and maintain the standards of quality, safety, and compliance defined by the organization and regulatory bodies.	AS/EN 9100 D

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Term	Definition	Reference
Accountable Executive	A single, identifiable person having responsibility for the effective and efficient performance of the service provider's SMS.	AS/EN 9100 D
Action (Preventive, Corrective, Correction)	Preventive Action[2]: action to eliminate the cause(s) of a potential nonconformity or other potential undesirable situation. Corrective Action[3]: action to eliminate the cause(s) of a nonconformity and to prevent recurrence. Correction[4]: action to eliminate a detected nonconformity.	ISO 9000:2015
Aircraft	Any machine that can derive support in the atmosphere from the reactions of the air other than the reactions of the air against the hearth's surface. In details, ICAO defines: a) Aeroplane or Airplane, as a power-driven heavier-than-air aircraft, deriving its lift in flight chiefly from aerodynamic reactions on surfaces which remain fixed under given conditions of flight, and b) Helicopter or Rotorcraft, as a heavier-than-air aircraft supported in flight chiefly by the reaction of the air on one or more power-driven rotors on substantially vertical axis.	ICAO Annex 19
Airworthy	Also for Airworthiness, the status of an aircraft, engine, propeller, or part when it conforms to its approved design and is in a condition for safe operation[5].	ICAO Annex 8

[2] Preventive actions prevent occurrences from happening, whereas corrective actions prevent their recurrence.
[3] Corrective actions prevent recurrence, whereas preventive action prevent occurrences from happening.
[4] Corrections can be taken in advance of, in conjunction with, or after a corrective action.
[5] Definition applicable until 25 Novembre 2026. As of 26 November 2026, Airworthy is the status of an aircraft, remote pilot station, engine, propeller, or part when it conforms to its approved design and is in a condition for safe operation.

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Term	Definition	Reference
Airworthiness Authority	Also for National Aviation Authority, Civil Aviation Authority, one or more entities designated by a (Member) State and having the necessary powers and allocated responsibilities for performing the tasks related to certification, oversight and enforcement in accordance with National Regulations.	EASA Reg (EU) 2018/1139
Certification	Any form of recognition in accordance with this Regulation, based on an appropriate assessment, that a legal or natural person, product, part, non-installed equipment, equipment to control unmanned aircraft remotely, aerodrome, safety-related aerodrome equipment, ATM/ANS system, ATM/ANS constituent or flight simulation training device complies with the applicable requirements of this Regulation and of the delegated and implementing acts adopted on the basis thereof, through the issuance of a certificate attesting such compliance	EASA Reg (EU) 2018/1139
Change Management	A formal process to manage changes within an organization in a systematic manner, so that changes which may impact identified hazards and risk mitigation strategies are accounted for, before the implementation of such changes.	ICAO Doc.9859
Civil Aviation Regulation	Laws, regulations, and rules established by a country to govern civil aviation activities within its jurisdiction. These regulations are designed to ensure compliance with ICAO's Standards and Recommended Practices (SARPs) as outlined in the Annexes to the Chicago Convention. Each ICAO member state is responsible for implementing its national aviation regulations in harmony with ICAO's global framework, adapting them to its specific needs and circumstances while maintaining international standards.	ICAO Chicago Convention

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Term	Definition	Reference
Continuous Improvement	Also for continual improvement, recurring activity to enhance performance[6].	ISO 9000:2015
Emergency Response Plan	A component of the service provider's SRM process to address aviation-related emergencies, crises, or events. The ERP should address foreseeable emergencies as identified through the SMS and include mitigating actions, processes, and controls to effectively manage aviation-related emergencies. The overall objective of the ERP is the safe continuation of operations and the return to normal operations as soon as possible.	ICAO Doc.9859
Event	Any anomaly in operating an aviation product or in performing an organization's activity.	SM-0001
Hazard (Safety)	A condition or an object with the potential to cause or contribute to an aircraft incident or accident.	ICAO Annex 19
Incident	An occurrence, other than an accident, associated with the operation of an aircraft which affects or could affect the safety of operation.	ICAO Annex 13

[6] The process of establishing (safety) objectives and finding opportunities for improvement is a continual process using audit findings and audit conclusions, analysis of data, management reviews, or other means and generally leads to corrective action or preventive action.

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Term	Definition	Reference
Interface (Safety)	In generic terms, the interaction between organizations, including the occasions when the interface is formalized, and offers the opportunity to exchange information. In most cases, organizations directly interfacing with each other are expected to formally define the interactions through contractual arrangements. In the scope of an SMS, the interface management may take a variety of forms, depending on the needs of the organizations involved, the level of risk identified and accepted and the ability of the organizations to affect the interface.	SM-0001
Investigation (Safety)	A process conducted for the purpose of accident prevention which includes the gathering and analysis of information, the drawing of conclusions, including the determination of causes and/or contributing factors and, when appropriate, the making of safety recommendations.	ICAO Annex 13
Just Culture	A culture in which front-line operators or other persons are not punished for actions, omissions or decisions taken by them that are commensurate with their experience and training, but in which gross negligence, willful violations and destructive acts are not tolerated.	EASA Reg (EU) 376/2014
Nonconformity	The non-fulfilment of a requirement, i.e., the need or expectation that is stated, generally implied or obligatory.	ISO 9000:2015
Occurrence	Also for Safety Occurrence, Safety Issue, Safety Event, any safety-related event which endangers or which, if not corrected or addressed, could endanger an aircraft, its occupants or any other person and includes in particular an accident or serious incident.	EASA Reg (EU) 376/2014

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Term	Definition	Reference
Organization	A person or group of people that has its own functions with responsibilities, authorities, and relationships to achieve its (safety) objectives[7].	ISO 9000:2015
Preliminary Report	The communication used for the prompt dissemination of data obtained during the early stages of the investigation.	ICAO Annex 13
Product	The output of an organization that can be produced without any transaction taking place between the organization and the customer.	ISO 9000:2015
Quality Management System	The management, i.e., the coordinated activities to direct and control an organization, with regard to quality.	ISO 9000:2015
Reporting System (Mandatory)	A process established by an Organization to facilitate the collection of details of occurrences which may represent a significant risk to aviation safety.	EASA Reg (EU) 376/2014
Reporting System (Voluntary)	A process established by an Organization to facilitate the collection of details of occurrences that may not be captured by the Mandatory Reporting System, or other safety-related information which is perceived by the reporter as an actual or potential hazard to aviation safety.	EASA Reg (EU) 376/2014
Risk (Safety)	The predicted probability and severity of the consequences or outcomes of a hazard.	ICAO Annex 19
Safety	The state in which risks associated with aviation activities, related to, or in direct support of the operation of aircraft, are reduced and controlled to an acceptable level.	ICAO Annex 19

[7] According to ICAO, an Organization can be also defined as a Service Provider.

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Term	Definition	Reference
Safety Assurance	Processes within the SMS that function systematically to ensure the performance and effectiveness of safety risk controls and that the organization meets or exceeds its safety objectives through the collection, analysis, and assessment of information.	SM-0001
Safety Culture	It is an expression of how safety is perceived, valued and prioritized by management and employees in an organization, and is reflected in the extent to which individuals and groups are: a) Aware of the risks and known hazards faced by the organization and its activities, b) Continuously behaving to preserve and enhance safety, c) Able to access the resources required for safe operations, d) Willing and able to adapt when facing safety issues, e) Willing to communicate safety issues; and f) Consistently assessing the safety related behaviors throughout the organization.	ICAO Doc.9859
Safety Management System	A systematic approach to managing safety, including the necessary organizational structures, accountability, responsibilities, policies, and procedures.	ICAO Annex 19
Safety Manager	The person or function responsible to the Accountable Executive for the performance of the SMS and for the delivery of safety services to the other departments in the organization.	ICAO Doc.9859
Safety Objective	A brief, high-level statement of safety achievement or desired outcome to be accomplished by the State Safety Programme or service provider’s safety management system.	ICAO Doc.9859

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Term	Definition	Reference
Safety Performance Indicator	A data-based parameter used for monitoring and assessing Safety Performance[8].	ICAO Annex 19
Safety Performance Target	The State or service provider's planned or intended target for a Safety Performance Indicator over a given period that aligns with the Safety Objectives.	ICAO Annex 19
Safety Policy	A formal statement of an organization's commitment to safety. It outlines the top management's approach to safety, providing a framework for establishing, implementing, and continually improving a safety management system (SMS). The safety policy serves as the foundation for all safety management efforts within an organization and includes clear roles, responsibilities, and expectations at every level to ensure the effective management of safety risks.	ICAO Doc.9859
Safety Promotion	A combination of training and communication of safety information to support the implementation and operation of an SMS in an organization enhancing its safety culture.	SM-0001
Safety Risk Management	A process within the SMS identifying the hazard, analyzing, assessing, and controlling related risks.	SM-0001

[8] In case of complex organizations, according to SM-0001 a Corporate SMS can be defined. It is composed by corporate governance, structure, and processes to cover some or all elements common across domains (such as accountability, safety policy, hazards identification and safety risks management principles, safety data collection and assessment, safety awareness and training).

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Term	Definition	Reference
Serious Incident	An incident involving circumstances indicating that there was a high probability of an accident and associated with the operation of an aircraft, which in the case of a manned aircraft, takes place between the time any person boards the aircraft with the intention of flight until such time as all such persons have disembarked, or in the case of an unmanned aircraft, takes place between the time the aircraft is ready to move with the purpose of flight until such time it comes to rest at the end of the flight and the primary propulsion system is shut down.	ICAO Annex 13
Service	Output of an organization with at least one activity necessarily performed between the organization and the customer.	ISO 9000:2015
State	In accordance with ICAO Annex 19, a State can be defined as: - State of Design, or the State having jurisdiction over the Organization responsible for the Type Design, or - State of Manufacture, or the State having jurisdiction over the Organization responsible for the final assembly of the aircraft, or - State of the Operator, or the State in which the Operator's principal place of business is located or, if there is no such place of business, the Operator's permanent residence.	ICAO Annex 19
State Safety Programme	An integrated set of regulations and activities aimed at improving safety.	ICAO Annex 19
Supplier	An organization that provides a product or a service.	ISO 9000:2015

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Term	Definition	Reference
Top Management	A person or group of people who directs and controls an organization at the highest level[9].	ISO 9000:2015

5. REFERENCED DOCUMENTATION

The following section reports a comprehensive list of the documents and publications on Aviation Safety and Safety Management System matters.

The information contained each publication was either part of the basis upon which the LH Safety Requirements for Suppliers were based on or can be used by the Suppliers to comply with them.

5.1. INTERNATIONAL CIVIL AVIATION ORGANIZATION (ICAO)

Document	Title	Source
Annex 19	Safety Management	ICAO E-Library – Annex 19
Doc.9859	Safety Management Manual (SMM)	ICAO E-Library – Doc.9859
Annex 13	Aircraft Accident and Incident Investigation	ICAO E-Library – Annex 13
Annex 8	Airworthiness of Aircraft	ICAO E-Library – Annex 8

5.2. CIVIL AVIATION AUTHORITIES

5.2.1. EUROPEAN UNION AVIATION SAFETY AGENCY (EASA)

Document	Title	Source
Reg (EU) 2018/1139	Basic Regulation	EASA Website – Basic Regulation
Reg (EU) 748/2012	Initial Airworthiness and Environmental Protection Amended by:	EASA Website – Initial Airworthiness

[9] Top management has the power to delegate authority and provide resources within the organization. If the scope of the management system covers only part of an organization, then top management refers to those who direct and control that part of the organization.

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	- Delegated Regulation (EU) 2022/201 - Implementing Regulation (EU) 2022/203	
Reg (EU) 1321/2014	Continuing Airworthiness Amended by: - Implementing Regulation (EU) 2022/1360 - Implementing Regulation (EU) 2023/203	EASA Website – Continuing Airworthiness
Reg (EU) 1178/2011	Approved Training Organization (Air Crew)	EASA Website – Air Crew
Reg (EU) 376/2014	Occurrence Reporting Including: - Implementing Regulation (EU) 2015/1018	EASA Website – Occurrence Reporting
Reg (EU) 996/2010	Investigation and prevention of accidents and incidents in civil aviation	EASA Website – Accident Investigation
EPAS	European Plan for Aviation Safety	EASA Website – EPAS

5.2.2. ENTE NAZIONALE PER L'AVIAZIONE CIVILE (ENAC)

Document	Title	Source
SSP – Italy	State Safety Program – Italy	ENAC Website – SSP

5.2.3. UK CIVIL AVIATION AUTHORITY (UK CAA)

Document	Title	Source
UK Reg (EU) 2018/1139	UK Basic Regulation	UK CAA Website – UK Basic Regulation
UK Reg (EU) 748/2012	UK Initial Airworthiness Regulation	UK CAA Website – UK Initial Airworthiness
UK Reg (EU) 1321/2014	UK Continuing Airworthiness Regulation	UK CAA Website – UK Continuing Airworthiness
UK Reg (EU) 376/2014	UK Occurrence Reporting Including: - UK Implementing Regulation (EU) 2015/1018	UK CAA Website – UK Occurrence Reporting

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UK Reg (EU) 996/2010	UK Accident Investigation	UK CAA Website – UK Accident Investigation
SSP – UK	State Safety Program – UK	UK CAA Website – UK SSP

5.2.4. FEDERAL AVIATION ADMINISTRATION (FAA)

Document	Title	Source
14 CFR	Code of Federal Regulations – Title 14 Aeronautics and Space	eCFR Website – 14 CFR
14 CFR Part 5	Code of Federal Regulations – Part 5 Safety Management System	eCFR Website – 14 CFR Part 5
14 CFR Part 21	Code of Federal Regulations – Part 21 Certification Procedures for Products and Articles	eCFR Website – 14 CFR Part 21
14 CFR Part 145	Code of Federal Regulations – Part 145 Repair Stations	eCFR Website – 14 CFR Part 145

5.2.5. URZĄD LOTNICTWA CYWILNEGO (ULC)

Document	Title	Source
SSP – Poland	State Safety Program – Poland	ULC Website – SSP

5.3. INTERNATIONAL STANDARD ORGANIZATIONS

5.3.1. INTERNATIONAL ORGANIZATION FOR STANDARDIZATION (ISO)

Document	Title	Source
ISO 9000	Quality Management	ISO Website – ISO 9000 family
ISO 9001:2015	Quality management systems – Requirements	ISO Website – ISO 9001:2015

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5.3.2. AEROSPACE INDUSTRIES ASSOCIATION (AIA) / GENERAL AVIATION MANUFACTURERS ASSOCIATION (GAMA) / SAE INTERNATIONAL

Document	Title	Source
SM-0001	International Safety Management System (SMS) Standard SM-0001	AIA Website – SM-0001 GAMA Website – SM-0001

5.3.3. INTERNATIONAL AVIATION QUALITY GROUP (IAQG)

Document	Title	Source
AS/EN 9100 D	Quality Management System – Requirements for Aviation, Space, and Defense Organizations	IAQG Website – Standards
SCMH	Supply Chain Management Handbook	SCMH Website – SCMH

5.3.4. VERTICAL AVIATION SAFETY TEAM (VAST)

Document	Title	Source

-	Vertical Aviation Safety Team – Safety Library
	Including, among others:
	- CAA Safety Management Systems Guidance Material – UK (CAP 795)
	- Safety Management Systems: Guidance for Small Non-Complex Organisations – UK (CAP 1059)
	- SMS templates (FAA)
	  ○ Safety Policy Template
	  ○ SMS Manual Contents Template
	  ○ Hazard Log Template
	  ○ Safety Performance Indicators Template
	  ○ Management of Change Template
	  ○ SMS for Small Organizations Template
		VAST Website – Safety Library

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6. LEONARDO SAFETY REQUIREMENTS FOR SUPPLIERS

6.1. GENERAL OVERVIEW

6.1.1. LEONARDO SAFETY COMMITMENT

Leonardo Articles are designed, manufactured, and supported to the maximum Airworthiness safety level.

This commitment places Aviation Safety as a fundamental key that allows Leonardo to maintain its competitiveness in the global market. In accordance with its Safety Policy, it is Leonardo Helicopters strong commitment to be “the safest rotorcraft manufacturer and organization in the world”.

Supporting this commitment, and in accordance with the regulations set forth by the National Airworthiness authorities, Leonardo has implemented the latest Safety requirements, introducing the Safety Management System (SMS) in its own approved organizations.

6.1.2. REGULATORY FRAMEWORK

Annex 19 of the ICAO Convention on International Civil Aviation established safety requirements for the aviation industry, focusing on the implementation of the Safety Management System (SMS). The SMS is designed to ensure continuous improvement in aviation safety as required by the mandatory compliance to Airworthiness Regulations.

SMS aims to improve aviation safety by proactively identifying and managing safety risks before they lead to accidents or incidents. It provides a systematic approach to managing safety, resources, and performance, and helps organizations understand their role in aviation safety. SMS is a decision-making system that uses both reactive and proactive measures, fostering a positive safety culture at all levels, including within organizations of the Leonardo Supply Chain.

The mandatory compliance to Airworthiness Regulations ensures that SMS efforts are grounded in the established safety framework, thereby supporting the overall safety objectives of the aviation industry. This compliance ensures that organizations meet the safety requirements set by aviation authorities and maintain high standards of safety performance across their operations.

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6.1.3. SCOPE

Leonardo expects Suppliers to fully support and collaborate on its Safety Commitment. This supportive commitment is achieved through collaboration and the conformity to Leonardo Safety Requirements for Suppliers.

6.1.4. MEANS OF COMPLIANCE

The Leonardo Safety Requirements for Suppliers are derived from the ICAO framework. For each element, Leonardo requires the Supplier to implement a set of basic and additional requirements. In details:

- Basic requirements are essential elements Leonardo requires to the Suppliers to fulfil the Scope. These are mandatory requirements expressed by the verb SHALL.
- Additional requirements are elements Leonardo requires to the Suppliers to support the implementation of the basic requirements. These are voluntary requirements expressed by the verb SHOULD.

Therefore, as a minimum Leonardo expects Suppliers to comply with basic requirements. However, compliance also to additional requirements is strongly recommended.

6.1.4.1. LEVERAGING QMS TO CONFORM WITH THE LEONARDO SAFETY REQUIREMENTS

Suppliers that have either already implemented a Quality Management System consistent with the AS/EN 9100 or ISO 9001 QMS Standard framework or are in the process to implement it, can demonstrate compliance through common QMS-SMS processes and procedures. Additional information on the similarity between QMS and SMS approach, structure, and processes can be found in § 5 Referenced Documentation and § 9 SMS-QMS Relationship.

6.1.5. FLOW-DOWN OF LEONARDO SAFETY REQUIREMENTS TO SUB-TIER SUPPLIERS

Elements of the Leonardo Safety Requirements scheme should be flowed down to all the Sub-tier Suppliers in accordance with requirements set forth in QRS-130 to the extent the Sub-tier Suppliers performance impact the compliance to the mandatory tasks.

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6.2. ICAO ELEMENTS OF THE LEONARDO SAFETY REQUIREMENTS

As anticipated, the Aviation Industry has implemented a common approach to Safety through the Safety Management System described in ICAO Annex 19. The Leonardo Safety Requirements for Suppliers cover the main elements of the ICAO Framework.

6.2.1. SAFETY CULTURE AND REPORTING

Fostering a positive Safety Culture allows people to report safety-related issues without fear of punishment. The reporting scope, objectives and perimeter must be clearly defined as part of the overall Organization's commitment to Safety.

6.2.2. ACCOUNTABILITY AND RESPONSIBILITIES

The definition of clear Safety accountabilities and responsibilities for Safety management is key to incorporate the Safety Culture concepts into day-by-day working practices. In doing so, the safety culture has a direct impact on safety performance.

6.2.3. SAFETY RISK MANAGEMENT

The identification, assessment and mitigation of Safety Risks arising from the Organization's activities[10] is the main objective of the Safety Risk Management. This is achieved through the identification of Safety Hazards that constitute the prerequisite for Risks to develop, along with the implementation of action to lower the Risk Level as low as reasonably practical.

6.2.4. SAFETY ASSURANCE

The monitoring of the Safety performance enables Organizations to ensure that the implemented Risk Controls are effective. The performance monitoring is achieved through the on-site verification of the Safety processes, the definition of measuring parameters and the management of changes, both within and outside the Organization. Altogether, these activities contribute to the continuous improvement of the Safety performance.

[10] The Organization's activities includes both internal and external factors, such as risks coming from the Organization's sub-tier Suppliers or other interfaces. Refer to § 6.2.6 for additional information.

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6.2.5. SAFETY PROMOTION AND TRAINING

Promoting the Safety activities and results and disseminating the commitment of the Top Management at all levels foster the Safety Culture within the Organization. Training activities of the major Safety topics are also part of the overall Safety promotion stream.

6.2.6. SAFETY INTERFACE MANAGEMENT

The Aviation Industry is a complex system, in which industries interface to exchange Products or Services, and information, including those relevant to hazards and risks. The identification, description, and management of these interfaces contribute to the overall Safety management. In facts, part of the SMS is the management of interfaces, including the Organizations' Supply Chain system.

The objectives of the Safety Interface Management are to:

a. Produce the most comprehensive list of Safety interfaces, including those for which the industry is not necessarily fully aware of,
b. Evaluate their criticality based on the type of delivered Products or Services, the potential hazards and risks connected with the Product or Service, as well as any pre-existing performance issue,
c. Prioritize the management of the most critical Safety Interfaces, and
d. Establish the most effective processes and procedures to address the identified hazards and risks in terms of Safety Risk Management and Safety Assurance.

6.3. SAFETY REPORTING AND INVESTIGATION

6.3.1. SAFETY REPORTING

Safety hazards, risks, failures, malfunctions, or any other issue that could potentially affect safety and damage the Product or Service must be reported without undue delay. In facts, reporting is a cornerstone of the Safety Risk Management.

Additionally, support for Leonardo Risk Analysis and Mitigation activities is required. This can be achieved by providing the necessary and/or requested data to assess potential Safety Issues and agreeing on the required mitigation actions. To minimize unnecessary workload, information on hazards, risks, or occurrences that do not impact the Company shall not be shared.

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6.3.2. SAFETY INVESTIGATION

When addressing Safety Issues, a Safety Investigation could be conducted to identify the causes and implement any preventive and/or corrective action to mitigate the identified Safety Risks.

When the Safety Investigation is conducted in response to an aviation accident or serious incident, the Safety Investigation is mandatory, and the deadlines must comply with the relevant Airworthiness Authority requirements.

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7. LEONARDO SAFETY REQUIREMENTS FOR SUPPLIERS WITH MANDATORY SMS

Considering the applicability of § 2, Suppliers either have already implemented a Safety Management System consistent with the ICAO Framework or are in the process to implement it. This is deemed sufficient to support the Leonardo Safety commitment stated in § 6.1.1.

7.1. BASIC REQUIREMENTS

7.1.1. SUPPLIER SAFETY MANAGEMENT SYSTEM

To conform with the principles of the Safety Management System, the Supplier:

(a) Shall provide evidence of the implementation and continuous suitability of the SMS in accordance with its Certification requirements or voluntary program, or the SMS implementation plan and relevant milestones achievement.

(b) Shall provide evidence of consistency between its own Safety Policy and the LH Safety Policy and Objectives[11].

7.1.2. SAFETY INTERFACE MANAGEMENT

To conform with the principles of the Safety Interface Management, the Supplier:

(a) Shall report safety issues through the process described in QRS-01. In details, the QRS-107 F03 form is the preferable means of reporting. However, already established alternative means of communication may be used.

7.2. ADDITIONAL REQUIREMENTS

7.2.1. SUPPLIER SAFETY MANAGEMENT SYSTEM

N/A.

7.2.2. SAFETY INTERFACE MANAGEMENT

N/A.

[11] LH is structured into different organizations, each with its own Safety Policy and Objectives. The supplier must verify the consistency of its Safety Policy with those of the organizations it interfaces with. All the Safety Policies and Objectives are available in the Additional Data section of the LH Supplier Portal.

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7.3. SUPPLEMENTARY REQUIREMENTS

7.3.1. KOPTER SUPPLIERS

The following supplementary requirements are applicable to all Suppliers receiving Purchase Orders from Kopter or with which a DO-PO Agreement with Kopter exists. These Suppliers:

(a) Shall alternatively:
  (1) Establish its own Safety Policy, or
  (2) Formalize a Statement of Binding to the Kopter Group Safety Policy (ref. 11049198)

(b) Communicate any Voluntary Occurrence Report (VOR) through the following email address: safety@leonardo.com

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8. LEONARDO SAFETY REQUIREMENTS FOR SUPPLIERS WITHOUT MANDATORY SMS

Considering the applicability of § 2, Suppliers have not implemented a Safety Management System. Therefore the following tasks are required to support the Leonardo Safety commitment stated in § 6.1.1.

8.1. BASIC REQUIREMENTS

8.1.1. SAFETY CULTURE AND REPORTING

To conform to the principles of the Safety Culture and Reporting, the Supplier:

(a) Shall act in accordance with the LH Safety Policy and Objectives[12].

8.1.2. ACCOUNTABILITY AND RESPONSIBILITIES

N/A.

8.1.3. SAFETY RISK MANAGEMENT

To conform with the principles of the Safety Risk Management, the Supplier:

(b) Shall establish an internal Safety hazard identification and risk management process[13]. The process shall include, at least:
  (1) The identification of Safety Hazards affecting the safety of the Product or Service,
  (2) The assessment of the Risks resulting from the identified Safety Hazards, including the classification of the Risk Level according to the internal Safety Risk Matrix, developed in accordance with the LH Risk Matrix,
  (3) The implementation of corrective actions to eliminate the Risks or to reduce them to an acceptable level; such actions shall be periodically monitored to assess their effectiveness,
  (4) As a good practice, promote results of the Risk Management activity within the Organization through awareness campaigns, workshop, Lesson Learned sessions and others, and

[12] LH is structured into different organizations, each with its own Safety Policy and Objectives. The supplier must endorse the Safety Policies and Objectives of the organizations it interfaces with. All the Safety Policies and Objectives are available in the Additional Data section of the LH Supplier Portal.
[13] Refer to AS/EN 9100 § 8.1.1 and § 8.1.3 for common QMS-SMS process. Further information is available in § 9.

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(5) The recording of the process (e.g., Safety Hazard Log / Safety Risk Register).

(c) Shall report to LH any Safety hazard and risk affecting the Safety of the Product or Service, according to § 8.1.6.

8.1.4. SAFETY ASSURANCE

N/A.

8.1.5. SAFETY PROMOTION AND TRAINING

N/A.

8.1.6. SAFETY INTERFACE MANAGEMENT

To conform with the principles of the Safety Interface Management, the Supplier:

(a) Shall appoint at least one Focal Point to coordinate the overall Safety Interface Management. Depending on the Organization, this could be either a newly nominated person or the responsibility can be assigned to an existing role.
  (1) The Focal Point(s) shall be trained on the Safety Management System (SMS). Depending on the Organization, this could be either achieved through the online LH E-Learning portal or via other means.
  (2) The Focal Point(s) shall be trained on the QRS-01 and the applicable module. The course is available on the LH E-Learning portal.

(b) Shall report safety issues through the process described in QRS-01. In details, the QRS-107 F03 form is the preferable means of reporting. However, already established alternative means of communication may be used. Accordingly, the Supplier shall share information on:
  (1) Safety occurrences connected with the interface, and
  (2) Any potential hazards and risks, including those resulting from internal audits or changes, which may affect the interface.

(c) When required, shall collaborate with Leonardo in:
  (1) Its internal Safety Investigation process providing any requested or useful data and information, and
  (2) The definition and implementation of joint corrective actions.

8.2. ADDITIONAL REQUIREMENTS

8.2.1. SAFETY CULTURE AND REPORTING

To conform with the principles of the Safety Culture and Reporting, the Supplier:

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(a) Should establish its own Safety Policy. The Supplier Safety Policy should:
  (1) Be signed by the Organization's Accountable Executive,
  (2) Be communicated throughout the Organization,
  (3) Clearly endorse the Just Culture and No Blame culture concepts,
  (4) In accordance with § 8.1.3, refer to the Organization's internal reporting system,
  (5) Guide the definition of Safety Objectives (SO), and
  (6) Be periodically reviewed to ensure it remains current and updated.

(b) Should develop an internal Voluntary Reporting System relevant to the Safety Hazard Identification and Occurrence reporting. Depending on the complexity of the Organization this could be either an independent process or integrated with the existing internal Reporting System[14].

(c) Should document the Internal Safety Management. Depending on the complexity of the Organization this could be either reported in a stand-alone Safety Manual or included in the exiting documentation.

8.2.2. ACCOUNTABILITY AND RESPONSIBILITIES

To conform with the principles of the Accountability and Responsibilities, the Supplier:

(a) Should include the Safety accountability in the Organization's Accountable Executive duties and responsibilities.

(b) Depending on the complexity of the Organization, the Accountable Executive may delegate some of its Safety-related duties and responsibilities to supporting figures. These include, among others:
  (1) The Safety Manager role, and
  (2) The Safety Officer role.

8.2.3. SAFETY RISK MANAGEMENT

N/A.

8.2.4. SAFETY ASSURANCE

To conform with the principles of the Safety Assurance, the Supplier:

(a) Should develop a process to monitor their Internal Safety Management performance. The Supplier should, at least:

[14] For additional information on the integration of the occurrence reporting process within the existing QMS requirements, refer to § 9.

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(1) Perform audits on the Internal Safety Management processes. Depending on the complexity of the Organization, this could be integrated with the internal monitoring program.
(2) Establish Safety Performance Indicators (SPI) and related Safety Performance Targets (SPT) with which to measure the Internal Safety Management performance in accordance with the Safety Objectives set forth in § 8.2.1.

(b) Should develop a change management process to identify Safety hazards connected to the change and manage risks resulting from the identified hazards in accordance with § 8.1.3. Depending on the complexity of the Organization, this could be either an independent process or integrated with the existing Change Management process[15].

(c) Should continuously improve the Internal Safety Management processes. Depending on the complexity of the Organization, this could be either an independent process or integrated with the existing Continuous Improvement process.

8.2.5. SAFETY PROMOTION AND TRAINING

To conform with the principles of the Safety Promotion and Training, the Supplier:

(a) Should develop an internal Safety training program. The internal Safety training program could include, at least:
(1) An initial training on Safety basic concepts, the Organization's commitment, the hazard identification and risk management process, the Safety Reporting requirements, and the change management process[16].
(2) A recurrent training to be attended within a suitable timeframe, but no less than every two years.

(b) Should establish an internal Safety communication, dissemination, and promotion process.

8.2.6. SAFETY INTERFACE MANAGEMENT

N/A.

[15] For additional information on the integration of the change management process within the existing QMS requirements, refer to § 9.
[16] Depending on the complexity of the Organization this could be either achieved through the online LH E-Learning portal or via other means.

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8.3. SUPPLEMENTARY REQUIREMENTS

8.3.1. KOPTER SUPPLIERS

The following supplementary requirements are applicable to all Suppliers receiving Purchase Orders from Kopter or with which an agreement between Kopter DO and the Supplier exists (e.g., Quality Plan). These Suppliers:

(a) Shall alternatively
  (1) Establish its own Safety Policy, or
  (2) Formalize a Statement of Binding to the Kopter Group Safety Policy (ref. 11049198)

(b) Communicate any Voluntary Occurrence Report (VOR) through the following email address: safety@leonardo.com

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9. SMS-QMS RELATIONSHIP

The present chapter is applicable to all the LH Suppliers for which the State does not require the implementation of the SMS and are qualified according to the AS/EN 9100 or ISO 9001 QMS Standards.

However, this chapter can also be used as a guidance material for Suppliers for which the State requires the implementation of the SMS through compliance to Civil Aviation Regulations or Suppliers which implemented the SMS with their National Aviation Authority on a voluntary basis.

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9.1. SMS-QMS ALIGNMENT AND GUIDANCE MATERIAL

SMS Component	SMS Element (Annex 19)	AMS (AS9100D) Requirement	Online resource Forms and templates	Online resource Lectures
Safety Policy and Objectives	1.1 Management Commitment	5.1 Leadership and Commitment	▸ SMS for Small Organizations ▸ Safety Management Systems: Guidance for Small Non-Complex Organisations -UK (CAP 1059) - VAST ▸ EHEST Safety Management Toolkit for Non-Complex Operators, 2nd Edition | EASA ▸ Phase 1 SMS Gap Analysis (evaluation framework) for non-Complex Organisations - VAST	▸ What is Missing in Your SMS? - VAST ▸ SMS Growing a Just Culture - VAST ▸ Determining the Value of SMS
		5.2 Policy	▸ Safety Policy Template - VAST	▸ N/A
		6.2 Quality Objectives and Planning to Achieve Them	▸ N/A	▸ N/A
	1.2 Safety Accountability & Responsibilities	5.3 Organizational Roles, Responsibilities, and Authorities	▸ N/A	▸ The Senior Manager's Role in SMS | SKYbrary Aviation Safety ▸ Safety Manager's Role In SMS | SKYbrary Aviation Safety ▸ The Frontline Manager's Role in SMS | SKYbrary Aviation Safety
	1.3 Appointment of Key Safety Personnel		▸ N/A	▸ N/A
		6.1 Actions to Address Risks and Opportunities	▸ N/A	▸ N/A

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SMS Component	SMS Element (Annex 19)	AMS (AS9100D) Requirement	Online resource Forms and templates	Online resource Lectures
	1.4 Coordination of Emergency Response Planning	6.3 Planning of Changes	▸ N/A	▸ N/A
	1.5 SMS Documentation	7.5 Documented Information	▸ SMS Manual Contents Template - VAST ▸ EHEST Safety Management Toolkit for Non-Complex Operators, 2nd Edition | EASA	▸ N/A
Safety Risk Management	2.1 Hazard Identification	8.1 Operational Planning and Control	▸ Safety Report Form Template - VAST ▸ Hazard Log Template - VAST	▸ Real World SMS 1: Hazard Reporting - VAST ▸ Real World SMS 2: Risk Assessment - VAST ▸ Real World SMS 3: Risk Control - VAST ▸ Real World SMS4: Risk Assurance - VAST ▸ Roadmap to a Just Culture: Enhancing the Safety Environment - VAST ▸ Hazard Identification-If You See Something - Say Something - VAST ▸ Hazard Taxonomy Examples | SKYbrary Aviation Safety

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SMS Component	SMS Element (Annex 19)	AMS (AS9100D) Requirement	Online resource Forms and templates	Online resource Lectures
	2.2 Safety Risk Assessment and Mitigation	8.1.1 Operational Risk Management	▸ EHEST MARIA Risk Assessment Toolkit | EASA ▸ ARMS SIRA Excel Tool | SKYbrary Aviation Safety	▸ Bow Tie Risk Management Methodology | SKYbrary Aviation Safety ▸ The ARMS Methodology for Operational Risk Assessment ▸ How to risk assess using the new ARMS methodology
		8.1.2 Configuration Management	▸ N/A	▸ N/A
		8.1.3 Product Safety	▸ N/A	▸ N/A
		8.7 Control of Nonconforming Outputs	▸ N/A	▸ N/A
Safety Assurance	3.1 Safety Performance Monitoring and Measurement	9.1 Monitoring, Measurement, Analysis, and Evaluation (9.1.1 & 9.1.3)	▸ Safety Performance Indicator Template - VAST	▸ Measuring Safety Performance Guidelines for Service Providers | SKYbrary Aviation Safety
		8.5.1 Control of Production and Service Provision	▸ N/A	▸ N/A
		9.2 Internal Audit	▸ N/A	▸ N/A
		9.3 Management Review	▸ N/A	▸ N/A
		8.1.3 Product Safety (“analysis and reporting of occurred events”)	▸ N/A	▸ N/A

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SMS Component	SMS Element (Annex 19)	AMS (AS9100D) Requirement	Online resource Forms and templates	Online resource Lectures
		8.4 Control of Externally Provided Products and Services (8.4.1 & 8.4.1.1 (d))	▸ N/A	▸ N/A
		8.5.5 Post-Delivery Activities	▸ N/A	▸ N/A
	3.2 Management of Change	6.3 Planning of Changes	▸ Management of Change Template - VAST	▸ N/A
		8.1.2 Configuration Management	▸ N/A	▸ N/A
		8.5.6 Control of Changes	▸ Management of Change Evaluation Tool - VAST	▸ N/A
	3.3 Continuous Improvement of the SMS	10.2 Nonconformity and Corrective Action	▸ N/A	▸ N/A
		10.3 Continual Improvement	▸ N/A	▸ N/A
Safety Promotion	4.1 Training and Education	7.2 Competence	▸ N/A	▸ N/A
		7.3 Awareness	▸ N/A	▸ The Human Factors "Dirty Dozen" | SKYbrary Aviation Safety ▸ Avoid the Dirty Dozen – 12 Causes of Human Factors Errors

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SMS Component	SMS Element (Annex 19)	AMS (AS9100D) Requirement	Online resource Forms and templates	Online resource Lectures
	4.2 Safety Communication	5.2.2 Communicating the Quality Policy	▸ N/A	▸ N/A
		7.3 Awareness	▸ N/A	▸ N/A
		7.4 Communication	▸ N/A	▸ N/A

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