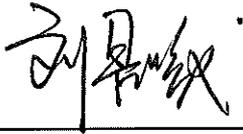


APPROVAL

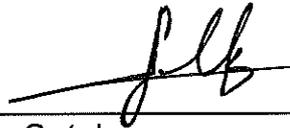
THIS IS TO CERTIFY APPROVAL BY:



Liu Chenxi

General Director of
Flight Standards Department
of Civil Aviation Administration of
China

Date: 2026.02.09



Aslan Satzhanov

Acting Chief Executive Officer -
Chairman of the Management Board
of the Aviation Administration of
Kazakhstan JSC

Date: 09.02.2026

MEMORANDUM OF UNDERSTANDING

ON

OPERATION SAFETY FOR IMPLEMENTATION OF THE SEVENTH FREEDOM TRAFFIC RIGHTS

BETWEEN

THE CIVIL AVIATION ADMINISTRATION OF CHINA (CAAC)
AND
THE AVIATION ADMINISTRATION OF KAZAKHSTAN JSC (AAK)



MEMORANDUM OF UNDERSTANDING ON OPERATION SAFETY
FOR IMPLEMENTATION OF THE SEVENTH FREEDOM TRAFFIC RIGHTS

The Civil Aviation Administration of China (CAAC) and the Aviation Administration of Kazakhstan JSC (AAK), hereinafter referred to as the Authorities,

- desiring to promote aviation safety;
- noting common concerns for the safe operation of civil aircraft;
- recognizing the importance of establishing and maintaining a high standard for operation;
- enhancing cooperation and efficiency in matters relating to the 7th freedom.

The Authorities will work in accordance with this Memorandum of Understanding (MOU) from the date on which it has been signed, until it is revised or replaced by other documents or revoked by any one of the Authorities.

1. GENERAL INFORMATION

1.1 INTRODUCTION

- (1) On June 3, 2020, CAAC published the "**Implementation Plan of the Seventh Freedom for Pilot Opening of Hainan Free Trade Port**", which allows the air operator of Kazakhstan to apply for operation under the 7th freedom in Hainan, China.
- (2) To implement the 7th freedom, the approved Kazakhstan operator has to set up their sub-base for international operation from Hainan, China, and the operator shall have a permit to operate by a third country to their destination.
- (3) As for operation under the 7th freedom, the legal liabilities related to the interests of Chinese citizens and citizens of other countries, in addition to requiring AAK to undertake the safety management responsibility as the state of operation in accordance with ICAO convention, it will inevitably involve the safety oversight responsibility of CAAC since the place of occurrence will be mainly in China.
- (4) Based on the above reasons and considering the convenience of the AAK safety oversight, the authorities agree to strengthen their cooperation on operational safety to implement the 7th freedom, including clarifying the respective responsibilities, information sharing, technical assistance and investigation.
- (5) This MOU is based on the above considerations.

1.2 DEFINITIONS

Notwithstanding definitions contained in the Authorities' regulatory documents, for the purpose of this MOU, the following definitions apply:

AOC: The Air Operator Certificate.

AMO: Aircraft Maintenance Organization.

AAK: Aviation Administration of Kazakhstan JSC.

CAAC: Civil Aviation Administration of China.

CAA: Civil Aviation Authority.

CAC: Civil Aviation Committee of the Ministry of Transport of the Republic of Kazakhstan.

CCAR-129: The Chinese Civil Aviation Regulation Part 129.

ICAO: International Civil Aviation Organization.

SDR: Service Difficulty Report.

Sub-base: A station of an operator other than the main base for operation flights as origin, departure, and destination airport, and normally with relatively settled aircraft and personnel at the station.

1.3 AAK OPERATION CERTIFICATION AND SURVEILLANCE FOR AIR OPERATOR

1.3.1 Regulations Basis

The AAK issues the Air Operator Certificate (AOC) and Operations Specifications to the air transport enterprise according to the Legislation of Kazakhstan, as well as approves the following documents of the air operator:

- A. Operations Manual;
- B. Maintenance Control Manual;
- C. Aircraft Maintenance Program;
- D. Minimum Equipment List;

As per the Legislation of Kazakhstan, an operator must arrange for all of the maintenance and release to service to be carried out by certified personnel on the maintenance base approved by AAK.

1.3.2 Certification

The certification for AOC is applied for by an air transport enterprise.

For initial certification, the following documents must be submitted to the AAK:

- A. Operations Manual(s);
- B. Training Manual(s);
- C. Engineering Exposition Document(s)/ Maintenance Control Manual(s);
- D. Aircraft Maintenance Program Manual;
- E. Minimum Equipment List;
- F. Dangerous Goods Manual (If Applicable);
- G. Security Manual;
- H. Emergency Manual;
- I. Operations Control Manual / Flight Dispatcher Manual;

MEMORANDUM OF UNDERSTANDING ON OPERATION SAFETY
FOR IMPLEMENTATION OF THE SEVENTH FREEDOM TRAFFIC RIGHTS

- J. Cabin Crew Manual (If Applicable);
- K. Quality Assurance Manual;
- L. Aircraft Flight Manual and Performance Schedules;
- M. Safety Management System Manual;
- N. Completed AAK Compliance Checklist; and
- O. Any other relevant manuals/documents.

The AAK has adopted a 5-phase process (Pre-application, Formal application, Document evaluation, Applicant's demonstration and AAK's evaluation, Formal award of AOC) for systematic and timely handling of all AOC applications.

After all documentation has been assessed to be complete and the demonstration phase has been completed satisfactorily, and if the applicant is assessed to be competent and fit, the AAK will prepare and present the AOC and an attachment (containing authorizations, limitations and provisions specific to each applicant) to enable the applicant to commence revenue operations.

The AOC is normally valid for two years upon grant or renewal, but this may be varied at the sole discretion of the AAK. The types of aircraft that may be flown and the associated operational approvals are specified in the operations specifications.

The AOC and the Operations Specifications are written in the English language.

If the holder of an AOC wishes to apply for the variation of its certificate, the complete application form with full details of the requested amendments and all required manuals and documents must be submitted to AAK for supplemental certification. The variation to the AOC includes changes to the following:

- A. Name of the organization specified in the Air Operator Certificate;
- B. Address of the organization specified in the Air Operator Certificate;
- C. The Chief Executive or persons nominated in accordance with AOC;
- D. The approved facilities or capabilities;
- E. New Aircraft Types;
- F. Adding New Aircraft (Same make/model);
- G. Operations Specifications Approvals;
- H. Change in area of operation.

1.3.3 Surveillance

The AAK will perform inspection/surveillance of the holder of an AOC in compliance with the Legislation of Kazakhstan, including:

- A. Fly or be on board the operator's aircraft in the course of normal operations;

- B. Visit the AOC holder's facilities and line stations to observe the AOC holder's operations;
- C. Inspect flight crew and aircraft maintenance engineer licenses and records of the AOC holder and their agents.

If, during the currency of an AOC, the AAK ceases to be satisfied that the holder is competent, the AAK may suspend, revoke or vary the AOC.

1.4 CAAC OPERATION CERTIFICATION AND SURVEILLANCE FOR FOREIGN OPERATOR

1.4.1 Regulations Basis

The Chinese Civil Aviation Regulation Part 129 (CCAR-129) applies to operation certification and surveillance of foreign operators.

As per CCAR-129, the certification is based on the operation approved by the CAA of the state for the foreign operator, including the following documents required by the standards of ICAO Annex 6:

- A. Air Operator Certificate and associated Operation Specification;
- B. Approved Operation Manual and Maintenance Control Manual;
- C. Approved Aircraft Maintenance Programs and Minimum Equipment Lists;
- D. Certificate for Aircraft Maintenance Organization.

1.4.2 Certification

The prerequisite for certification is that the foreign operator has already got its economic approval from CAAC and submitted an application for operational certification.

(1) For a foreign operator operating under other than the 7th freedom

For initial certification, a copy of documents about the operation approval by the CAA of the state and the necessary implementation information is required to verify that the foreign operator's application is appropriately covered. The implementation information includes, but is not limited to:

- A. List of aircraft to be operated in China;
- B. List of airports to be operated in China;
- C. Responsible contact persons;
- D. Subcontract agents.

After the initial certification is completed, CAAC will issue a CCAR-129 Operation Specification to the foreign operator, which lists all the aircraft and operations authorized to be operated in China, including the responsible contact information and necessary limitations for operation.

The foreign operator may make an application to revise their CCAR-129 Operation Specification, and CAAC will re-issue the CCAR-129 Operation Specification through the

supplemental certification, using the same process as the initial certification.

(2) For a foreign operator operating under the 7th freedom

For initial certification, a copy of documents about the operation approval by the CAA of the state and the necessary implementation information is required to verify that the foreign operator's application is appropriately covered. The implementation information includes, but is not limited to:

- A. List of aircraft to be operated in China and compliance with the emergency equipment installed on each aircraft.
- B. Responsible management personnel in the sub-base.
- C. Operation management functions authorized to the sub-base for self-control.
- D. Maintenance planning and engineering functions authorized to the sub-base for self-control.
- E. Line and base (if any) maintenance organization in the sub-base, and their CAA of the state approval.

Additionally, if there are functions authorized to sub-base for self-control, the self-control program needs to be submitted to CAAC.

As the certification for operating under the 7th freedom is completed, CAAC will issue or revise the CCAR-129 Operation Specification with specific 7th freedom articles to the foreign operator, including clarifying the special requirements for occurrences reporting for operations under the 7th freedom.

For the speciality of operations under the 7th freedom, the CCAR-129 Operation Specification will also specify the requirement for the foreign operator to report to CAAC any unsafe occurrence or incident that happens on their aircraft operated in China.

1.4.3 Surveillance

For a foreign operator conducting operations approved in China, CAAC will perform surveillance as follows:

(1) For a foreign operator operating under other than the 7th freedom

The surveillance of the foreign operator is just ramp inspections, to routinely check if their operations in China are following the approved CCAR-129 Operation Specifications.

If there are findings, CAAC will notify the representatives of the foreign operator to take corrective actions, and operation restrictions may be taken on the specific aircraft, crew or airport if the findings are not properly corrected by the foreign operator.

(2) For a foreign operator operating under the 7th freedom

For foreign operators operating under the 7th freedom in China, they have to follow the approved CCAR-129 Operation Specifications. The surveillance consists of, but is not limited to:

- A. Ramp inspection;

- B. Audit of sub-base;
- C. Occurrence or incident investigation.

If there are findings, CAAC will notify the Responsible management persons of the foreign operator in the sub-base to take corrective actions, as well as transfer the findings to their CAA of the state. The operation restrictions may be placed on the specific aircraft or crew if the findings are not properly corrected by the foreign operator.

2. CERTIFICATION AND SURVEILLANCE FOR KAZAKHSTAN OPERATOR OPERATING UNDER THE 7th FREEDOM IN CHINA

WHEREAS, the Contracting Parties are Parties to the Convention on International Civil Aviation, signed at Chicago on 7 December 1944;

WHEREAS, the Contracting Parties affirm their obligations under Annex 6 to the Convention (Operation of Aircraft), as amended, and their commitment to maintain the highest practicable standards of aviation safety;

WHEREAS, the Contracting Parties consider it necessary to establish clear arrangements for the certification and continuing surveillance of operations conducted under 7th Freedom of Air;

NOW, THEREFORE, the Contracting Parties agree on the following responsibilities.

2.1 AAK RESPONSIBILITIES

The AAK is responsible for the operation approval of the Kazakhstan operator for their international operation from the sub-base of Hainan, China. The AAK approval should include the following documents required by the standards of ICAO Annex and the Legislation of Kazakhstan .

- A. The AOC and Operation Specifications;
- B. Operations Manual and Maintenance Control Manual;
- C. Aircraft Maintenance Program and Minimum Equipment List;
- D. Other documents require AAK approval.

The AMO(s) arranged for the carry out of aircraft maintenance and release to service, in the sub-base of Hainan, China, should be approved by AAK according to the Legislation of Kazakhstan.

The AAK is also responsible for the surveillance/inspection of the Kazakhstan operator as per the Legislation of Kazakhstan for their international operation from the sub-base of Hainan, China, as described in paragraph 1.3.3. The AAK surveillance/inspection should include, but not be limited to:

- A. Visit the sub-base of Hainan, China, of the Kazakhstan operator to observe their operations;
- B. Inspect flight crew and aircraft maintenance engineer licenses and records of the AOC holder and their agents related to the operation in the sub-base of Hainan,

China.

2.2 CAAC RESPONSIBILITIES

The CAAC is responsible for the CCAR-129 certification on the basis of the AAK approvals to the Kazakhstan operator, for their international operation from the sub-base of Hainan, China, as described in paragraph 1.4.2 (2).

The CAAC is also responsible for the surveillance of the Kazakhstan operator for its international operations from the sub-base of Hainan, China, as described in paragraph 1.4.3 (2). Means of surveillance conducted by CAAC are as follows:

- A. Ramp Inspection: similar to normal CCAR-129 surveillance, to be conducted by the CAAC independently;
- B. Sub-base Audit: focus on but not limited to the operator's management functions authorized to their sub-base for self-control, to be conducted either by the CAAC independently or with the AAK jointly;
- C. Occurrence or Incident Investigation: including unsafe crew operation and aircraft Service Difficulty Report (SDR), to be conducted either with the AAK jointly or by the CAAC independently.

3. MUTUAL COOPERATION AND TECHNICAL ASSISTANCE

3.1 INFORMATION EXCHANGE

The authorities will provide information regarding the operation under the 7th freedom in China to each other, including but not limited to:

- A. Changes in regulation or implementation procedures;
- B. Changes in organization or key personnel ;
- C. Changes in the approval of the Kazakhstan operator involved in the operation under the 7th freedom of Air in China ;
- D. Reports and Information mentioned in paragraphs 2.2 B and 2.2 C .

In addition, any proposal to amend related regulations or implement procedures will be provided to each other for the opportunity to review and comment prior to the amendment being effected.

3.2 TECHNICAL ASSISTANCE

The authorities will provide technical assistance to each other, upon request, for the purposes of certification and surveillance of the operation under the 7th freedom in China. Such areas of assistance may include, but are not limited to:

- A. Providing reports regarding operational compliance;
- B. Conducting and reporting on technical investigations to the extent permitted by the laws applicable to each other; and

C. Obtaining and providing data for occurrence or incident reports.

3.3 URGENT OR UNUSUAL SITUATIONS

Where urgent or unusual situations occur which will influence the operation under the 7th freedom in China but are not specifically addressed, the authorities will review and consult with each other, and upon mutual consent, take appropriate action, including taking necessary operational restrictions on the specific aircraft or crew.

3.4 NOTIFICATION OF NON-COMPLIANCE

The authorities will notify each other of any serious non-compliance identified on the certification or surveillance for the operation under the 7th freedom in China and promptly advise the other authority of any enforcement action, including cancelation, revocation or suspension of the aircraft certificate of airworthiness, the personnel license or the organization approval.

3.5 PROTECTION OF SENSITIVE OR CONFIDENTIAL INFORMATION

When the authorities provide each other with any information, it will clearly identify whether that information is sensitive or confidential and the nature of that sensitivity or confidentiality. The Authority giving the information may also impose a limitation on the use or disclosure of the information by the receiving Authority. The Authority receiving the information will handle the information in a manner having regard to its confidentiality or sensitivity and will not deal with personal information contrary to the privacy laws applying to the Authority.

4. MISCELLANEOUS

4.1 INTERPRETATION

Any disagreement regarding the interpretation or application of this MOU will be resolved by consultation between the Authorities.

4.2 APPEALS

The Kazakhstan operator operating under the 7th freedom in China may appeal any enforcement placed on them. Appeals of CAAC enforcement actions are made in accordance with the CAAC regulations. Appeals of AAK enforcement actions are made in accordance with the Legislation of Kazakhstan .

5. TERMINATION

Any of the Authorities may, at any time, give written notice to the other Authority of its decision to terminate this MOU. This MOU and the CCAR-129 Operation Specification, with specific 7th freedom articles applicable to the Kazakhstan operator, will be terminated three months following the date of receipt of the notice by the other Authority, unless the aforementioned notice of termination is withdrawn by mutual agreement before the expiry of this period.

APPENDIX: POINTS OF CONTACT

CAAC:

For the liaison of this MOU:

Air Transportation Standards Division
Flight Standards Department
Civil Aviation Administration of China

155 Dong Si Street, West BEIJING,
China 100710

Phone: +86 10 64091409
Fax: +86 10 64092459
Email: jx_cao@caac.gov.cn

For the application of operation under the 7th freedom in HAI NAN, China:

Foreign Air Operators Division
Central & Southern Regional Administration
of Civil Aviation Administration of China

163 Yun Xiao Road, Guang Zhou
GUANG DONG, China 510406

Phone: +86 20 86122463
Fax: +86 20 86235045
Email: wangnaer_zn@caac.gov.cn

AAK:

For the liaison of this MOU:

Aviation Administration of Kazakhstan JSC

010000, 55/15 Mangilik El Ave.,
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Republic of Kazakhstan

Phone: +7 (7172) 79-82-28
Email: frontoffice@caa.gov.kz