

Speak Up and Whistleblowing Policy

A. INTRODUCTION

1 Objectives and Scope

1.1 What is the Speak Up and Whistleblowing Policy

- (a) Cathay Pacific Airways Limited (the “**Company**”) and its subsidiaries (together “**Group**”, “**we**”, “**our**” or “**us**”) are committed to high standards of fair dealing, honesty and integrity, as reflected in the manner in which the Group conducts its business dealings around the world, as well as its strong commitment to build and maintain a culture of compliance.
- (b) We encourage any Reporter (as defined below) to ‘Speak Up’ should they have a concern relating to any suspected wrongdoing in connection with the Group, including potential breaches of laws, regulations or any of our Group policies (“**Alleged Wrongdoing**”). Examples of Alleged Wrongdoing are set out in Section 4.1 below.
- (c) The primary objectives of this Speak Up and Whistleblowing Policy (this “**Policy**”) are:
 - (i) to encourage Reporters to report Alleged Wrongdoing in a timely manner;
 - (ii) to provide guidance on how to report Alleged Wrongdoing and how reports are reviewed and investigated; and
 - (iii) to provide assurance to anyone who makes or intends to make a report under this Policy in good faith (or with reasonable grounds to believe or suspect that his/her report is true at the time of reporting) that he/she will be protected and not be subjected to punishment, unfair treatment or retaliation of any kind as a result of making a report.
- (d) This Policy applies to the Group’s people and operations both in Hong Kong and around the world.

1.2 Who can make a report

- (a) This Policy applies to everyone who has or had a direct or indirect relationship with the Group, including but not limited to:
 - (i) all directors, officers and employees (including but not limited to temporary agency workers, trainees, interns and secondees, paid or unpaid, wherever located) (together, “**Employees**”) of any Group entity;
 - (ii) shareholders of any Group entity and (where such shareholders are corporate entities) their respective directors and company secretaries;
 - (iii) third parties dealing with any Group entity (including but not limited to customers, suppliers, subcontractors, agents and self-employed persons, as well as their personnel and persons working under their supervision or direction) (together, “**Third Parties**”);
 - (iv) relatives, dependants and spouses of an individual falling within any of the categories above; and
 - (v) an individual who is otherwise a whistleblower eligible for protection under applicable laws.

Any of the above persons reporting on Alleged Wrongdoing may be treated as a **“Reporter”** within the meaning of this Policy.

- (b) For the avoidance of doubt, the Policy also applies to a person:
 - (i) who has ceased to be a Reporter defined in the Policy, provided that the information on which the concern is based has been acquired during the Reporter’s relationship with the Group; or
 - (ii) whose relationship with us is yet to begin, provided that the information on which the concern is based has been acquired during a recruitment process or other pre-contractual negotiations.

1.3 Consistency with Laws and Regulations

This Policy shall be read in conjunction with and is subject to any relevant laws and regulations that any relevant governmental or regulatory bodies may from time to time prescribe or issue on the matters governed by this Policy. In the event that any matters and procedures herein are inconsistent or in conflict with any relevant laws and regulations as prescribed or issued by relevant governmental or regulatory bodies, the latter shall prevail to the extent of such inconsistency or conflict.

2 Review of Policy

This Policy may be updated from time to time as and when deemed appropriate by the Company. The latest version of this Policy, including additional regional or local-specific guidance, (the **“Additional Regional Supplements”**), is available on the Company’s public website www.cathaypacific.com (About the Cathay Group > Responsible business: Corporate governance).

3 Questions about the Policy

Any questions relating to this Policy should be addressed to Group Compliance at compliance@cathaypacific.com.

B. MAKING A REPORT

4 Definition of Alleged Wrongdoing

4.1 What kinds of concerns should be reported

This Policy encourages Reporters to report any concern relating to any Alleged Wrongdoing. “**Alleged Wrongdoing**” involves suspected or actual serious wrongdoing relating to the Group, which includes but is not limited to the following areas:

- (a) Any criminal activity or serious regulatory breach in any jurisdiction (e.g. corrupt practices, fraud, insider dealing, and cartel activity);
- (b) Non-Compliance with any Group policies (e.g. the Code of Conduct, the Anti-bribery, Corruption, Anti-Money Laundering and Terrorist Financing Policy, and the Competition Law Compliance Policy);
- (c) Improprieties in financial reporting or internal controls (e.g. falsification of business or financial records, and auditor independence concerns);
- (d) Safety related issues and violations (e.g. issues that represent a significant risk to the safety and security of our operations, customers or colleagues);
- (e) Harassment, discrimination or bullying in any form (e.g. sexual harassment, and prejudicial treatment against others on the grounds of race, sex, sexual orientation, family status, disability or religion);
- (f) Incidents or behaviours likely to damage the Group’s business operations or reputation (e.g. conflicts of interest, and use of alcohol or illicit drugs in the workplace);
- (g) Deliberate concealment (or attempt of concealment) of any of the above (e.g. destroying or deleting documents, tipping-off, and hindering a report to be made under this Policy); and
- (h) Any other areas in respect of which the Reporter may be protected under applicable laws.

4.2 What kinds of concerns or matters are not covered under this Policy

- (a) The reporting channels that are provided through this Policy are not intended to be used to circumvent the Group’s business or commercial decisions. They should also not be used to air personal disputes or grievances, even if they are work-related.
- (b) All concerns or matters that are not covered under this Policy will not be handled pursuant to this Policy, but may be dealt with through the disciplinary or grievance procedures, or other internal procedures provided by the Group, where appropriate.
- (c) Allegations which are based on unsubstantiated rumours and for which a preliminary evaluation does not result in an appropriate minimum plausibility of Alleged Wrongdoing may not be investigated.

5 Protection for Reporters and others

5.1 Protection against retaliation

- (a) Any retaliation (or any threat or attempt to retaliate) against the following persons is strictly prohibited under this Policy:
 - (i) a Reporter who has raised a concern in good faith (or with reasonable grounds to believe or suspect that the information on which he/she makes a report is true at the time of reporting);
 - (ii) any person who assists the Reporter in the reporting process in a work-related context, or cooperates with an investigation;
 - (iii) any third parties connected with the Reporter and who could suffer retaliation in a work-related context (such as a colleague or relative of the Reporter who at the same time has a work-related connection with the Group); and
 - (iv) a legal entity which the Reporter owns, works for or is otherwise connected with in a work-related context.
- (b) The protections provided under this Policy will not be extended to anyone who: (i) acts in bad faith; (ii) raises malicious or vexatious allegations; or (iii) knowingly makes a false report.
- (c) Retaliation of any kind is unacceptable. If any Reporter believes that they have been subject to retaliation as a result of a report being made, they should report it to Group Compliance at compliance@cathaypacific.com as soon as possible. Any such report will be taken seriously. An Employee who is found to have engaged in retaliation may be subject to disciplinary action, including termination of employment.

5.2 Identity protection

- (a) We will handle all allegations in a sensitive manner. We will take reasonable steps to protect the confidentiality of the identities of the Reporter, any person mentioned in a report, and/or any person who assists the Reporter in the reporting process, including any other information from which their identities may be directly or indirectly deduced.
- (b) We will not divulge any such information to anyone beyond authorised personnel except where we are under a legal obligation to do so. For example, should an investigation lead to regulatory enforcement (including criminal prosecution), it may become necessary for the Group, relevant Employee(s) or a Reporter to provide evidence or be interviewed by relevant authorities.

6 Reporting Alleged Wrongdoing

6.1 Reporting channels. There are several channels through which Reporters may report their concerns of Alleged Wrongdoing:

- (a) **For all Reporters: To Group Compliance, via the confidential third-party reporting channels**

The following reporting channels are hosted by our third-party service provider. All reports will be routed directly to Group Compliance, which is authorised by the Group to act as an impartial and qualified team to receive reports under this Policy, and evaluate and take action on such reports.

By telephone	Click here for the respective toll- free line(s) in each applicable country.
Via the online reporting portal	www.cathaypacific.ethicspoint.com

(b) **For Employees: directly to a supervisor or other management personnel**

Employees may also raise concerns of Alleged Wrongdoing in writing with their line manager or supervisor. If an Employee does not feel comfortable raising the concern with his/her line manager or supervisor, the report can be raised with another member of management. In either case, the person who receives the report should immediately refer the matter to Group Compliance.

- (c) If a report relates to Group Compliance, such report should be submitted to Group Internal Audit directly at GIA8GRP@cathaypacific.com, and Group Internal Audit will conduct an investigation according to this Policy and notify the Chair of the Audit Committee.

6.2 Report content

- (a) It is not necessary for a Reporter to provide evidence or “prove the case” when making a report under this Policy. However, we expect a report to include as much information as possible, including (as applicable) details about the nature and background of the concern, why it is believed to be true, the persons involved and relevant date(s) of the suspected wrongdoing or violation, etc. Otherwise, we may not be able to initiate an investigation.
- (b) If, after making a report, there is any change to the information provided or the basis on which the report was made, the Reporter should provide relevant information as soon as possible. Please note that if insufficient or inaccurate information is provided in a report, the effectiveness of our investigation may be hindered.
- (c) Reporters are encouraged to provide their names and contact details, so that clarification of the reports made or further relevant information can be obtained directly from them where required. However, we recognise that in some cases Reporters would prefer to keep their identity anonymous. Reports may be submitted anonymously using the reporting channels above, and will be assessed (and if needed investigated) in a way similar to other reports. Please note, however, that anonymous reports could limit our ability to thoroughly and/or expeditiously investigate a concern.
- (d) If a person knowingly makes a false report, the person may be investigated. Any Employee found to have knowingly made a false report may be subject to disciplinary action, including termination of employment.

C. INVESTIGATION

7 Investigation procedures and outcome

7.1 Initial assessment. Upon receiving a concern raised under this Policy, Group Compliance team will:

- (a) evaluate whether the concern is within the scope of this Policy; and
- (b) assess the severity of the concern and determine whether an investigation is required to properly resolve the matter.

Allegations which are based on unsubstantiated rumours and for which a preliminary evaluation does not result in an appropriate minimum plausibility of Alleged Wrongdoing may not be investigated.

If we deem any report to present an opportunity for improvement, the matter may be referred to a relevant department for separate consideration, even if the concern raised is determined not to require an investigation.

7.2 Investigation. Reports will be acknowledged in a reasonable timeframe in accordance with any requirements under applicable laws. Where necessary, further information may be sought. For cases determined to require an investigation, the scope of investigation may include interviews, examination of documents and the obtaining of legal advice. Investigators will be independent and any individuals with conflicts of interest or who are subjects of report shall be excluded from the investigation.

7.3 Investigation progress updates and conclusion. We aim to complete investigations within a reasonable timeframe. The result of an investigation may be communicated to the Reporter, where we consider it appropriate and in accordance with applicable laws. However:

- (a) there may be certain limitations to the level of information we can disclose due to privacy concerns, confidentiality obligations and/or other legal requirements; and
- (b) it may not be possible to provide the above updates where concerns are raised anonymously and not via the reporting channels set out in Section 6.1 above.

7.4 External reporting. We reserve the right to report any suspected or actual violations of law to competent authorities.