

Whistleblowing Policy

Version 1.3

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1 Objectives and Scope

1.1 What is the Whistleblowing Policy?

Cathay Pacific Airways Limited (the “**Company**”) and its subsidiaries (together “**Cathay Pacific Group**”, “**Group**”, “**we**” or “**us**”) has a well-earned reputation for fair dealing, honesty and integrity. This is reflected in the manner in which the Company conducts its business dealings around the world, as well as the Company’s strong commitment to build and maintain a culture of compliance.

We encourage employees and third parties to “Speak Up” should they have a concern relating to serious wrongdoing within the Group, including potential breaches of our Code of Conduct. This is supported by our Whistleblowing Policy (this “**Policy**”), which provides guidance on how to raise concerns and the steps that will be followed when concerns are reported to us.

This Policy should be read in conjunction with our Code of Conduct, which sets out our expectations in respect of the conduct of our employees, as well as describing Cathay Pacific Group’s commitment to making ethical choices on business issues.

1.2 Who does the Whistleblowing Policy apply to?

This Policy applies to all employees (including temporary agency workers, interns and secondees), officers and directors of Cathay Pacific Group (together, “**Employees**”) and third parties who deal with Cathay Pacific Group (for example, customers and suppliers) (“**Third Parties**”).

1.3 Why do we have this Policy?

It is in the best interests of the Group, as well as our Employees and Third Parties, that concerns of suspected wrongdoing be reported. This enables us conduct a thorough investigation and take prompt and necessary action.

This Policy sets out a reporting mechanism which is designed to help us mitigate legal, financial, operational and reputational risk to the Group. The primary objectives of this Policy are:

- to encourage Employees, Third Parties, as well as individuals and entities acting for or on behalf of the Group, to report suspected wrongdoing with the confidence that their concerns will be given serious, prompt and appropriate attention;
- to provide guidance on how to report suspected wrongdoing; and
- to provide assurance to anyone who makes a report in good faith that they will not be subjected to retaliation of any kind.

Any reporting under the Whistleblowing Policy can be done confidentially through multiple channels, further information can be found below.

1.4 What kinds of concerns should be reported through the Whistleblowing Policy reporting channels?

This Policy encourages Employees and Third Parties (each, a “**Whistleblower**”) to report any concerns of suspected or actual serious wrongdoing relating to the Group, which includes but is not limited to the following areas:

- **IMPROPRIETIES IN FINANCIAL REPORTING OR INTERNAL CONTROLS** – examples include: falsification or destruction of business or financial records; misrepresentation or suppression of financial information; breaches of internal financial reporting policies/controls, and auditor independence concerns.
- **CRIMINAL OFFENCES OR BREACHES OF OTHER LEGAL OR REGULATORY REQUIREMENTS** – examples include: fraud or theft.
- **HARASSMENT OR DISCRIMINATION IN ANY FORM**
- **SERIOUS BREACHES OF THE COMPANY'S POLICIES, GUIDELINES AND PROCEDURES** – examples include: corrupt practices (including giving or receiving bribes or other improper benefits); and anti-competitive behaviour under antitrust/competition laws (e.g. cartel activities).
- **UNETHICAL BEHAVIOUR THAT HAS THE POTENTIAL TO BRING THE COMPANY INTO DISREPUTE** – examples include: conflict of interest concerns.
- **RETALIATION OR RETRIBUTION AGAINST ANY INDIVIDUAL WHO REPORTS A CONCERN** – examples include: statements, conduct or actions involving discharging, demoting, suspending, harassing or discriminating against an individual for reporting a concern in good faith.
- **ANY PERCEIVED RISK TO THE COMPANY'S BUSINESS, REPUTATION OR OPERATIONS**
- **DELIBERATE CONCEALMENT OF ANY OF THE ABOVE** – examples include: destroying/deleting documents in an effort to tamper with an investigation of suspected wrongdoing.

Note: The reporting channels that are provided through this Policy are not intended to be used to question the Group's business or commercial decisions. They should also not be used to air personal disputes or grievances, or address matters that would be more appropriately dealt with through the disciplinary or grievance procedures, or other internal procedures provided by the Group.

2 How will I be protected if I make a report?

2.1 Protection against retaliation

We will protect any individual who raises an issue or reports a concern in good faith from retaliation. Retaliation against any individual who raises a concern in good faith, will not be tolerated and will be dealt with in an appropriate manner, which may include disciplinary action for Employees.

2.2 Identity protection

We will treat all allegations in a sensitive and confidential manner. The Whistleblower's identity will not be divulged without his/her consent wherever possible.

However, there may be circumstances in which the Group is required or legally obliged to disclose the Whistleblower's identity. For example, should an investigation lead to a criminal prosecution, it may become necessary for a Whistleblower to provide evidence

or be interviewed by relevant authorities. If this is the case, necessary steps will be taken to ensure that the Whistleblower suffers no detriment.

Whistleblowers are required to maintain confidentiality at all times and must not disclose to any other individual that they have filed a report. They must also not disclose the nature of the report and the identities of any other individuals involved.

3 How do I report a concern under the Whistleblowing Policy?

There are a variety of channels through which Employees and Third Parties may report their concerns under this Policy:

- **To Group Compliance, via the confidential third party reporting channels**

Concerns regarding actual or suspected wrongdoing may be raised via the following confidential reporting channels, which are hosted by our third party service provider. All reports will then be routed directly to Group Compliance.

By telephone	Please refer to Appendix 1 for the respective toll free line(s) in each applicable country.
By the online reporting portal	www.cathaypacific.ethicspoint.com

- **For Employees, directly to a Supervisor or Other Management Personnel**

Employees may also raise concerns of suspected wrongdoing in writing, with their line manager. If an Employee does not feel comfortable to raise the concern with his/her manager, this can be raised with an alternative manager. The matter should then be immediately referred to Group Compliance team by the manager who has received the report.

Important Note:

- (1) We will investigate all credible concerns that are reported under this Policy. When submitting a report, as much detail as possible should be provided, including names and dates, etc., in order to help facilitate fact finding/investigation process.
- (2) Whistleblowers are encouraged to provide their names and contact details, so that clarification of the reports made or further applicable information can be obtained directly from them where required. However, we recognise that in some cases Whistleblowers may not feel comfortable identifying themselves. In these cases, reports may be submitted anonymously. Please **note**, however, that anonymous reports could limit our ability to thoroughly investigate a concern.
- (3) If a knowingly false report is made, for personal gain or any other ulterior motive, the person making the report will be investigated. This may result in disciplinary action for Employees, including termination of employment.
- (4) 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.

4 Investigations and reporting

Upon receiving a concern raised under this Policy, Group Compliance team will evaluate whether the concern is within the scope of this Policy, and will assess the severity of the concern and determine whether an investigation is required to properly resolve the matter.

Group Compliance will be primarily responsible for managing and maintaining oversight of investigations and other departments are likely to be called upon to assist. To ensure independence and avoid conflicts of interests in the investigations, all reports once assessed by Group Compliance and deemed to require follow up will be investigated independently by appropriate parties.

Investigators will be completely detached from any teams related to the subject matter of the reports; investigations may, in certain circumstances and particularly where the matter is sensitive or serious, be conducted by Group Internal Audit and/or an outside party, and where appropriate, with no involvement from the relevant Business Unit.

For reports which amount to Major or Catastrophic risks under the “Company Corporate Risk Matrix” (as may be amended from time to time) (the “**Matrix**”), the results will be independently considered by an Executive Director of the Company.

We are committed to the fair treatment of all individuals who are involved in an investigation, including those who are under investigation or those whose identity becomes relevant in the course of an investigation.

5 Concerns raised under the Whistleblowing Policy – Reporting by Group Compliance

The reporting of concerns raised under the Whistleblowing Policy may be subject to legal privilege and other legal obligations of confidentiality.

- **To Company’s Executive Directors**

Where appropriate, a monthly written update on all Whistleblowing cases will be provided to Company’s Executive Directors.

- **To Group Corporate Risk, Group Internal Audit and the Audit Committee**

- **Immediate Escalation of Moderate Risks and other Risks as appropriate to Group Corporate Risk**

Group Compliance will immediately inform Group Corporate Risk, of any concerns reported under this Policy which amount to Moderate risks under the Matrix, or which are otherwise viewed by Group Compliance as meriting escalation.

- **Immediate Escalation of Major or Catastrophic Risks and other Risks as appropriate to Group Corporate Risk, Group Internal Audit and the Chair of the Audit Committee**

Group Compliance will immediately inform Group Corporate Risk, Group Internal Audit and the Chair of the Audit Committee of any concerns reported under this

Policy which amount to Major or Catastrophic risks under the Matrix, or which are otherwise viewed by Group Compliance as meriting escalation. The Chair of the Audit Committee will consider whether the Audit Committee itself should be informed of such risks.

- **Regular Reporting of all Whistleblowing cases**

Group Compliance will report monthly, or more frequently as required (for Catastrophic or Major risks, this will require weekly reporting), to the Audit Committee on the results of investigations of all concerns raised, and as part of this will provide a list of all live matters to the Chair of the Audit Committee. This will be included in the monthly Legal & Compliance report submitted by the Group General Counsel to the Audit Committee, as well as any reporting provided at regular meetings of the Audit Committee.

- **To Group General Counsel**

Regulatory compliance matters arising from Whistleblower reports which amount to Moderate, Major or Catastrophic risks under the Matrix will be immediately reported to the Group General Counsel.

- **To the Individual Reporting the Concern**

Where appropriate, the status/resolution of any investigation will be communicated to the person who originally raised the concern under this Policy.

Whistleblowers will, where deemed appropriate, be given the opportunity to check the status/resolution of any investigation on cases reported via the telephone / the online reporting portal. However, it may not be possible to provide updates on the status of an investigation when concerns are raised anonymously and not via the above channels.

6 Roles and responsibilities

6.1 Group Compliance

Responsibilities include:

- Overall management of this Policy and the report handling process.

This includes:

- maintaining this Policy;
- overseeing and managing any investigations undertaken based on this Policy;
- where required, referring concerns raised to, or seeking assistance from, other departments (such as the People Department) in connection with investigations, or obtaining advice on Group policies, guidelines and procedures;
- communicating with relevant Employees to whom concerns within the scope of this Policy have been raised directly;

- reporting concerns raised under this Policy to the Audit Committee and appropriate parties;
- consolidating, filing and retaining all records of concerns received in connection with the Whistleblowing Policy, together with the status/results of investigations of matters within the scope of the Whistleblowing Policy; and
- monitoring the quality of services of the third party service provider, including in hosting the confidential reporting channels.

6.2 Group Internal Audit

Responsibilities include:

- independent appraisal of the adequacy and effectiveness of this Policy and whistleblowing process, to be reported annually to the Audit Committee;
- supporting Group Compliance to conduct whistleblowing investigations, in specific instances where the expertise / independence of Group Internal Audit is agreed to be required; and
- reviewing monthly case reports from Group Compliance to identify any potential internal control weaknesses that require further investigation via Group Internal Audit's programme of work.

6.3 Group Corporate Risk

Responsibilities include:

- where necessary, overseeing/advising Group Compliance on the management of the whistleblowing process including communication of this Policy, where the adequacy of the whistleblowing channel is deemed by management to be a key risk area for the Group; and
- assessing any risks raised which are deemed to be Moderate, Major or Catastrophic in nature under the Matrix.

6.4 Group Legal

Responsibilities include:

- assisting Group Compliance with investigations, as needed and appropriate; and
- providing legal advice as required.

6.5 People Department

Responsibilities include:

- consulting in the development and maintenance of this Policy as required;
- managing and conducting investigations, as needed and appropriate; and
- providing advice to Group Compliance on our People policies where required.

6.6 Business Units and Management

Responsibilities include:

- communicating, supporting and reinforcing this Policy;
- managing and conducting investigations, as needed and appropriate; and
- immediately referring all concerns raised directly to them under, and within the scope of, this Policy to Group Compliance.

6.7 Employees

Responsibilities include:

- acting with integrity and honesty at all times in carrying out their duties; and
- reporting any actual or suspected wrongdoing to Group Compliance according to this Policy.

Note

This Policy may be amended from time to time as and when deemed appropriate by the Company.

Queries and clarifications

Should you have any queries relating to this Policy, please contact Group Compliance team of the Company at compliance@cathaypacific.com.

Appendix 1 – Toll Free Line(s) for Reporting

Country	Hotline(s)
China - Mainland, Hong Kong, Macao, Taiwan regions	
Mainland China	400-999-4530 (English, Mandarin, Cantonese)
Hong Kong SAR	800-908839 (English, Cantonese)
Taiwan China	00-801-102-880 (Mandarin) 855-229-9304 (English)
Africa	
South Africa	Online reporting portal only
Americas	
Canada	855-229-9304 (English)
Mexico	001-855-366-2458 (English, Spanish)
United States	855-229-9304 (English)
Asia	
Bangladesh	Online reporting portal only
Cambodia	Online reporting portal only
India	000-117 (Hindi) 855-229-9304 (English)
Indonesia	001-801-10 (Indonesian, not available on cellular phones and please use public phones which have international access) 855-229-9304 (English)
Japan	Online reporting portal only
Malaysia	Online reporting portal only
Maldives	704-526-1126 (English)
Myanmar	Online reporting portal only
Nepal	Online reporting portal only
Pakistan	00-800-01-001 (Punjabi, Urdu, not available on cellular phones) 855-229-9304 (English)
Philippines	1010-5511-00 (PLDT-Tagalog Operator) 105-11 (Globe, Philcom, Digitel, Smart) 855-229-9304 (English)

South Korea	00308-132884 (English, Korean)
Singapore	800-1102074 (English, Mandarin, Malay)
Sri Lanka	112-430-430 (Sinhalese, outside Colombo) 2-430-430 (Sinhalese, Colombo) 855-229-9304 (English)
Thailand	001-800-11-0029735 (English, Thai)
Vietnam	1-201-0288 (Vietnamese) 1-228-0288 (Vietnamese) 855-229-9304 (English)
Australasia	
Australia	1-800-139957 (English)
New Zealand	Online reporting portal only
Europe	
Belgium	0-800-100-10 (Dutch, French, German) 855-229-9304 (English)
France	0800-917075 (English, French)
Germany	0-800-225-5288 (German) 855-229-9304 (English)
Israel	1-809-31-7148 (English, Hebrew, Arabic)
Italy	800-797458 (English, Italian)
Ireland	00-800-222-55288 (UIFN, English) 1-800-550-000 (Ireland, English) 855-229-9304 (English)
Netherlands	Online reporting portal only
Poland	0-0-800-1510052 (English, Polish)
Spain	900-99-0011 (Spanish) 855-229-9304 (English)
Switzerland	0-800-890011 (German, French, Italian) 855-229-9304 (English)
United Kingdom	0808-234-7287 (English)
Middle East	

Bahrain	800-000-00 (US military base, Arabic) 800-00-001 (Bahrain, Arabic) 800-000-05 (cellular phones, Arabic) 855-229-9304 (English)
United Arab Emirates	8000-021 (United Arab Emirates, Arabic) 8000-55-66 (Du, Arabic) 8000-061 (Military-USO and cellular, Arabic) 855-229-9304 (English)