

Code of Conduct

What is the Code of Conduct?

The Code of Conduct or “Code” is a document designed to provide you, our employees, with guidelines on how to conduct yourself in an ethical manner whilst employed by Cathay Pacific Group, both on a day to day basis, as well as when dealing with issues that you may face as an employee.

The Code also sets out Cathay Pacific Group’s commitment to make ethical choices on issues that affect our employees, customers, business associates, community neighbours and the general public.

Who does the Code apply to?

The Code applies to all Cathay Pacific Group employees globally, including directors, officers, temporary agency workers, interns and secondees. Where the term “employee” is used within the Code, this is also intended to include all of the above parties.

What do we expect from you?

Cathay Pacific Group employees are required to act in a lawful manner at all times, in all locations where the company operates. Cathay Pacific Group has a zero tolerance approach to Cathay Pacific Group employees who support or participate in illegal activities.

In addition, as an employee of Cathay Pacific Group, you are expected to take the necessary steps to ensure that you comply with the Code of Conduct at all times.

Breaches of the Code hold serious consequences and may lead to disciplinary action, which may include termination of employment. In cases of suspected corruption or other criminal offences, it may be necessary to file a report to the appropriate authorities.

Associated policies

The Code of Conduct should be read in conjunction with a number of supporting policies, which are referenced throughout the Code.

It is your responsibility to familiarise yourself and comply with both the Code and all associated policies.

Applying the Code in Outports

As the Code applies to all employees globally, we are subject to local legislation both within Hong Kong and in all countries in which we operate.

Should there be a situation where the Code conflicts with local legislation or regulations in an Outport, local law will always take precedence.

Should you identify a conflict with local law, please raise this as soon as possible with your HR Business Partner or Regional Head of People.

Amendments and waivers to the Code

The Company reserves the unilateral right to vary, amend or withdraw the Code of Conduct.

Any amendment or waiver of any part of the Code must be approved by the Board of Cathay Pacific Airways.

Respect in the workplace

We are proud of our diverse workforce and we are committed to providing an inclusive work culture. We appreciate that our people are our most valuable asset and we are committed to being an equal opportunity employer.

As an employee of Cathay Pacific Group, you are expected to behave with courtesy and respect towards everyone that you encounter during the course of your employment.

Any form of harassment or discrimination on the basis of gender, religion, race, nationality or ethnic origin, cultural background, social group, disability, sexual orientation, marital status and family status, age or political opinion will not be tolerated.

Workplace bullying of any form will also not be tolerated.

We have a number of policies in place which outline our commitment to respect in the workplace and describe the steps that we take to ensure that all employees are treated fairly, equally, and with respect. Further details and information can be found in the [Anti-Bullying and Anti-Harassment Policy](#), [Non Discrimination Policy](#) and [Diversity and Inclusion Policy](#).

Human rights

We are committed to respecting and supporting the dignity and human rights of our employees, and continuously strive to adopt workplace practices that respect international human rights and ultimately keep our global operations free from human rights abuse, including people trafficking and child labour.

Environment, health and safety

We are committed to conducting our business in a manner which fosters the sustainable use of the Earth's resources, minimises as far as commercially practicable any adverse impact on the environment, and protects the health and safety of our employees, customers, business associates, community neighbours and the general public.

Conflicts of interest

A conflict of interest may occur when your personal relationships or interests interfere or are perceived to interfere with your role and/or your ability to make objective decisions on behalf of the Company.

We are committed to conducting our business without conflicts of interest and you should actively avoid any situation which may lead to an actual, potential or perceived conflict of interest.

You are required to declare any actual, perceived or potential conflict of interest by completing the [Conflict of Interest Declaration Form](#) and submitting this to your department head, regional general manager or country manager. Further information can be found in the Conflict of Interest Declaration Form, however, below are some examples of circumstances that would potentially be deemed as a conflict of interest:

- Family members employed within the same department, particularly where a family member has line management responsibility.
- Working for a non-Swire company or any non-affiliated organisation whilst being employed by Cathay Pacific Group (further information can be found in the Outside Employment section of the Code).
- Standing as a board member or officer with any organisation that may have business dealings with Cathay Pacific Group or any of its associated or subsidiary companies.
- Investing or having business dealings with any organisation that Cathay Pacific Group has a relationship with (other than through the course of employment with Cathay Pacific Group), in circumstances where your role in Cathay Pacific Group may stand to benefit that organisation.
- Investing or having business dealings with a competitor of Cathay Pacific Group, in circumstances where your role in Cathay Pacific Group may stand to benefit that competitor.
- Any business dealings with any organisation where other family members have an interest, in circumstances where your role in Cathay Pacific Group may stand to benefit that organisation.

Outside employment

As an employee of Cathay Pacific Group, you are generally not permitted to undertake outside employment. This rule applies to both regular employment and on a consultancy basis. However, should you wish to apply for exceptional approval of employment outside of your role with Cathay Pacific Group, you must submit your request to your department head, regional manager or country manager, along with the Compliance Department for consideration. Both parties must approve the request before this is to be considered as fully approved.

Further information can be found in the [Outside Employment Policy](#).

Purchasing ethics

If you are involved in procurement-related activities, it is important that you represent Cathay Pacific Group in a fair and ethical manner at all times and that the reputation of the Company is upheld in all business dealings.

Commercial decisions must be fair and unbiased, and a clear audit trail should always be available on how decisions were made. Goods and services should be purchased in a competitive and equitable way so that the purchases give the best value for money to the Company.

You have a responsibility to ensure that the process is transparent and accountable.

Further information can be found in the [Procurement Policy](#), as well as the [Procurement and Aircraft Trading](#) area of the Intranet.

Gambling

You should not engage in gambling of any kind with colleagues, customers, or with any other individual who has business dealings with Cathay Pacific Group. This includes clients, suppliers and business associates.

Gambling during working hours and/or on Company premises is not permitted.

Alcohol and other drugs

You must not be under the adverse effect of alcohol or other drugs whilst at work. This includes medication, where this potentially impairs the performance of your duties.

It is not acceptable to use, possess, traffic, manufacture or sell illicit drugs at any time whilst employed or engaged by the Company.

Further information can be found in the [Alcohol and Other Drugs \(AOD\) Policy](#).

Company property

Resources that you have access to as an employee of Cathay Pacific Group should be used primarily for business purposes, however, reasonable personal use is permitted. This includes IT equipment, software and Company facilities.

Confidential and/or proprietary information

You have a duty to protect any confidential and/or proprietary business information relating to Cathay Pacific Group, including information relating to customers, employees, operations, suppliers, products, pricing and financial records. All confidential and/or proprietary information must be used only for the purpose for which it is intended. This applies both during and on completion of your employment with Cathay Pacific Group.

Confidential and/or proprietary information comes in many forms, and can include written, oral, visual (including photographic images) and electronic information or data. You must be mindful to treat all information confidentially regardless of its format and take the appropriate measures to protect such information.

Intellectual property

You must respect and adhere to the intellectual property rights of the Company both during and on completion of your employment with Cathay Pacific Group, further information on which can be found in the [Intellectual Property Policy](#).

Data privacy

Any personal data relating to Cathay Pacific Group's customers or employees must be handled and stored confidentially and in a way that ensures compliance with confidentiality and data privacy laws both within Hong Kong and globally.

Personal data may include, but is not limited to, information such as an individual's name, address, email address, salary, age, gender, and ethnicity.

The accessing or processing of personal data must always be on a "need-to-know" basis and "need-to-use" basis.

Further information on handling personal data, including guidelines and Cathay Pacific Group's policy on [Personal Data \(Privacy\) Policy](#), can be found on the Intranet.

Anti-bribery

We are committed to conducting our business ethically and with integrity in all business dealings and relationships, and we take a zero-tolerance approach to bribery and corruption. You have a responsibility to comply with Cathay Pacific Group's [Anti-Bribery Policy](#), as well as any applicable anti-bribery and anti-corruption laws that are in place in the country in which you are employed.

Gifts and entertainment

We understand that it is customary for employees to exchange gifts, meals and entertainment with clients and business associates. This is a standard practice, particularly given the nature of Cathay Pacific Group's business, and

is permissible provided that the gift is of a modest value and has a justifiable business purpose.

You must ensure, however, that any gift or offer of entertainment is exchanged in an open manner and declared appropriately, in line with our [Gift, Hospitality and Other Advantages Guidelines](#). You should also be mindful that the acceptance of any gift does not create a conflict of interest or is perceived as an attempt to influence a business decision.

Before accepting or providing any gift or invitation to an entertainment event, please refer to the Gift, Hospitality and Other Advantages Guidelines.

Political activities

As an employee of Cathay Pacific Group, you are prohibited from using Company resources (e.g. Yammer, Company email, notice boards, etc.) to express your political opinion. If employees choose to participate in political activities, Company uniform must not be worn and employees must not behave in a manner that implies or suggests any sponsorship or endorsement from Cathay Pacific Group.

Participation in illegal political activities of any kind is not acceptable to the Company. As an employee of Cathay Pacific Group, your participation in illegal political activities has the potential to bring the Company into disrepute and in some circumstances may impact your ability to fulfil your role. Therefore, this may result in investigation, disciplinary action and/or termination of employment.

Lobbying

It is often necessary to lobby government and corresponding bodies either directly or through trade associations to promote policies that encourage Cathay Pacific Group's business and achieve workable legislation that may affect our businesses. This is a normal, accepted business practice.

Should you be involved in lobbying activities through the course of your employment, you have a duty to ensure that all policies, lobbying and campaign finance laws that are in place in the country in which you are employed are complied with. This includes all applicable Cathay Pacific Group policies, including the Anti-Bribery policy.

Conduct that may affect the Company's interests

Engaging in any activity, either during or outside of working hours, which may:

- bring the Company into disrepute;
- impact your ability to carry out your role to the Company's satisfaction or as required by any relevant regulatory authority; or
- impair the Company's ability to meet any legal, regulatory or operational obligations or requirements in Hong Kong, mainland China and other locations where the company operates;

may lead to investigation, disciplinary action and/or termination of employment.

Competition and antitrust

We are committed to complying with all applicable competition and antitrust laws, which are laws that are in place to prohibit unfair and anti-competitive behaviour. Breach of competition laws is a serious offence and may expose Cathay Pacific Group to severe penalties and other sanctions, and in some cases individuals to imprisonment.

Below are some examples of anti-competitive behaviour which could be regarded as a breach of competition laws:

- Participating in price fixing, collective boycotts or market sharing arrangements.
- Exchanging competitively sensitive information with competitors.

- Imposing restrictions on customers or suppliers.
- Abusing a position of market dominance.

Further information can be found in the [Competition Law Compliance Policy](#).

Whistleblowing

We have a strong commitment to building and maintaining a culture of compliance, and you are encouraged to “speak up” via the Whistleblowing Policy/Procedure if you suspect that there has been a breach of the Code, the law, or have concerns around serious wrongdoing.

We will investigate any concern that is reported under the Whistleblowing Policy and will take appropriate follow-up action as deemed appropriate. All information received will be kept confidential and we will extend protection to whistleblowers against any retaliation.

Further information can be found in the [Whistleblowing Policy](#) and [Whistleblowing Policy Frequently Asked Questions](#).

Social media

You should always be mindful when posting on social media such as Facebook, Twitter or LinkedIn. You are accountable for what is posted into the public domain from your personal social media account.

You must not disclose confidential information relating to Cathay Pacific Group on social media, or post anything that could bring Cathay Pacific Group into disrepute, interfere with the privacy of colleagues or implies Cathay Pacific Group’s endorsement of your personal views.

Should you require further guidance on what we regard as acceptable use of social media from our employees, please refer to the [Social Media Policy](#).

Professional engagements

We support our employees in attending professional engagements both inside and outside of the Cathay Pacific Group network, and this can often result in raising brand awareness and promoting Cathay Pacific Group.

Should you be invited to speak publicly at a professional engagement where you will be making reference to your employment with Cathay Pacific Group or referencing Cathay Pacific Group in any way, approval must be sought from your line manager and the Corporate Affairs Department before accepting the invitation.

If you are representing Cathay Pacific Group at a corporate event (e.g. conferences, recruitment fairs), you should keep in mind at all times that you are a representative of Cathay Pacific Group and our brand and conduct yourself accordingly.

Media statements

Should you be approached by the media to provide a statement on any matter relating to Cathay Pacific Group, you should politely decline the request and refer the query to the Corporate Affairs Department.

Queries and clarifications

Should you have any queries relating to the Code of Conduct or its associated policies, please contact:

Policy and Process Manager, Employee Experience Department