

## HAECO Whistleblowing Policy

### 1. General

- a. HAECO is committed to high standards of business ethics and corporate governance. HAECO believes in dealing appropriately with Relevant Persons, those with whom HAECO does business and the communities in which HAECO operates. HAECO therefore encourages Relevant Persons and third parties to report improprieties relating to HAECO. This document contains our whistleblowing policy. It sets out how reports of improprieties can be made and how they are reviewed and investigated.
- b. This Policy applies to all Relevant Persons of HAECO and to third parties who deal with HAECO. Associated and joint venture companies are encouraged to establish whistleblowing policies comparable to this Policy.

### 2. Definitions

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| “HAECO”            | means Hong Kong Aircraft Engineering Company Limited and/or, as the context may require, its subsidiaries or associated companies in which HAECO has management control or any of them. |
| “Policy”           | means this Whistleblowing Policy.   |
| “Relevant Persons” | means the employees (including secondees), officers and directors of HAECO.   |

### 3. Whistleblowing and improprieties

- a. **Whistleblowing** is where a Relevant Person or a Third Party (each a **Whistleblower**) reports a concern about a suspected or actual impropriety relating to HAECO.
- b. Improprieties include misconduct, malpractice and unethical behaviour. It is not possible to give an exhaustive list. Examples include the following:
  - i. criminal offences or breaches of other legal or regulatory requirements;
  - ii. misappropriation of property;
  - iii. breaches of financial reporting or internal control requirements;
  - iv. breaches of contract;
  - v. violations of the HAECO Corporate Code of Conduct, which deals with (among other things) business ethics, conflicts of interest and bribery;
  - vi. violation of other HAECO policies, for example as to health and safety and privacy;
  - vii. concealment of any of the above.
- c. Improprieties include harassment and workplace bullying, but these should be reported under HAECO’s “Respect in the Workplace Policy” instead of under this Policy.

#### **4. Confidentiality**

- a. All information received from a Whistleblower will be kept confidential, except where there is a legal or regulatory requirement to disclose it or where it is disclosed to law enforcement or comparable authorities. In addition, the identity of a Whistleblower may need to be disclosed in order to investigate the concern raised by the Whistleblower.
- b. The Whistleblower must, except where there is a legal or regulatory requirement to disclose, keep confidential the existence and subject matter of the report and the identities of all those mentioned in the report.

#### **5. The contents of a report**

Reports made by Whistleblowers should include details of the impropriety (including names of those involved and relevant times, dates and places), reasons for the report and any available supporting documentary and other evidence. Full evidence is not expected, but the more that can be provided, the easier it will be to investigate the matter.

#### **6. How to make a report**

- a. Third Parties should make their reports to the Group Internal Audit Department of John Swire & Sons (H.K.) Limited (GIAD) or via a designated third party service provider (Service Provider), where available. Reports to GIAD can be made in writing or, by prior appointment, in person.
- b. Relevant Persons should make their reports to any of the following:
  - i. The Relevant Person's immediate supervisor, the head of the department in which the Relevant Person works or the head of human resources at the business unit at which the Relevant Person works;
  - ii. Service Provider, where available;
  - iii. GIAD at [group.audit@jsshk.com](mailto:group.audit@jsshk.com) by sending letters or emails.

#### **7. Anonymous reports**

Whistleblowers are strongly encouraged to provide their names and contact details, so that clarification of their reports and further information can be obtained from them. However, whistleblowers who are not comfortable identifying themselves may make anonymous reports.

#### **8. Investigations**

- a. All reports will be referred to the head of human resources of the business unit to which the report relates. The designated management and/or Governance Board will carry out a preliminary review of the report and decide whether to carry out an investigation. If they decide not to carry out an investigation, the matter will be closed.
- b. The investigation may include interviews, examination of documents and the obtaining of legal advice. Whether to report the result of a review or investigation to the Whistleblower is at the discretion of the investigator.
- c. HAECO will keep a record of all reports made by Whistleblowers and what was done in response to them. The record will include the name (if there is one) of the Whistleblower, a summary of the report and details and the outcome of the resulting review and investigation (if there is one).
- d. A Relevant Person found to have perpetrated or participated in an impropriety will be subject to disciplinary action, which may include termination of employment. Suspected

criminal offences and breaches of the law may be reported to law enforcement and the appropriate authorities.

**9. No retaliation or victimisation**

Retaliation against or victimisation of a Whistleblower who acts in good faith will not be tolerated. Nor will a Whistleblower so acting suffer any detriment as an employee (for example demotion or an unwanted transfer).

**10. False reports**

If a Whistleblower makes a report which is found to be capricious, malicious or knowingly false or made for personal gain, any review or investigation will cease, a report may be made to law enforcement authorities and action may be taken to recover losses and damages. If the Whistleblower is a Relevant Person, disciplinary action may be taken, which may include termination of employment. No such action will be taken if a report is made in good faith.

**11. Right of Amendment**

HAECO reserves the right to amend any provision of this Policy at any time with or without prior notice.

Group Human Resources Office

13 July 2020