



WHISTLEBLOWING POLICY (Version 1.0)

1. Introduction

- 1.1 Greater Bay Airlines (“The Company”) is committed to achieving and maintaining a high standard of integrity, accountability, and transparency in all aspects of its business and to ensure that its affairs are conducted in accordance with applicable laws and regulations. The Company encourages any person, including employees, customers, suppliers, contractors to report any fraud, misconduct, malpractice, or irregularity within the Company.

2. Purpose

- 2.1 This policy aims to provide reporting channels and guidance on reporting suspected improper conduct involving the Company or any of its employees, suppliers, contractors, agents and other third parties who are acting for or on behalf of the Company.

3. Scope of Reporting

- 3.1 Whilst it is impossible to give an exhaustive list of the activities or behaviours that constitute improper conduct covered by this policy, the following serves as examples of such activities and behaviours:

- Criminal offences and unlawful acts (e.g. fraud, bribery, theft, forgery);
- Form of coercion, harassment or discrimination;
- Misleading or deceptive conduct (e.g. representations which amount to improper or misleading financial reporting practices);
- Action or inaction which would potentially endanger the health or safety of any individual or cause serious harm to the environment

- 3.2 The following activities are not covered under this policy:

- Any complaints that fall outside the purview of the Company
- Any complaints that are related to the service quality
- Any complaints made against the Company’s former staff
- Any complaints regarding the way where the Company’s staff has carried out their duties
- Any personal grievances for unfair treatment

4. Protection to Whistle-blower

- 4.1 Whether or not the allegations are being proven, the Whistle-blower making appropriate report under this policy is assured of protection against unfair dismissal, victimisation, or unwarranted disciplinary action. The protection is provided given



that the Whistle-blower is acting in good faith but not for personal gain, and in a reasonable manner. On the other hand, the Company reserves the right to decline or discontinue an investigation when the Whistle-blower is proven to raise false or malicious allegations.

5. Confidentiality

- 5.1 The Company will make every effort to keep the Whistle-blower's identity confidential. On the other hand, the Whistle-blower is also required to keep confidential of the allegations and identities of those involved in order not to jeopardize the investigation. Under the circumstances where the Whistle-blower's identity must be revealed according to law and regulations, the Company will inform the Whistle-blower of the potential disclosure of his or her identity.

6. Reporting Channels

- 6.1 The Whistle-blower should report the concern in writing and provide information including the person(s) that you wish to report, details of concerns and relevant supporting documents. These documents should be submitted to the Manager, Internal Audit of the Company through the following channels:

Post: Greater Bay Airlines
12/F, One Citygate,
20 Tat Tung Road,
Tung Chung, Lantau,
Hong Kong
(Attn: Manager, Internal Audit)

(It should be sent in a sealed envelope marked "Strictly Private and Confidential – To be opened by the addressee only")

Email: whistleblowing@greaterbay-airlines.com

- 6.2 The Whistle-blowers are required to put their name to any reports they make. Anonymous reporting is usually not addressed.

7. Time Limit

- 7.1 Reported concerns will only be dealt with if they are lodged within a year of the date on which the Whistle-blower becomes aware of the concerns.

8. Investigation and Reporting Process

- 8.1 Upon receiving a reported concern under this policy, the Manager, Internal Audit will conduct a preliminary assessment to evaluate the validity and relevance of the



concerns. If it is determined to be valid and relevant, it will be reported to the CEO or the board (if the reported concern involves CEO) to decide if an investigation is required. Normally investigation is conducted by the Internal Audit Department.

- 8.2 In case an internal investigation is conducted, an investigation report including the actions taken in response to the issue will be prepared upon completion and submitted to the CEO or the board (if the reported concern involves CEO). The report may also include recommendations as to appropriate follow-up actions which may be taken. The Whistle-blower will be informed of the final results of the investigation where appropriate. This result is final in the absence of new evidence and cannot be appealed under this policy.

9. Personal Information Collection

- 9.1 The personal data provided under the policy will be used to investigate the relevant reported concern. The Whistle-blower is entitled under the Personal Data (Privacy) Ordinance to ascertain whether the Company holds personal data relating to the Whistle-blower, and to request access to or to request the correction of any personal data relating to the Whistle-blower held by the Company.

10. Policy Review

- 10.1 The Policy shall be reviewed and updated as necessary.