

Whistleblowing Policy / 举报政策

1. Purpose 目的

1.1 CALC is committed to maintaining good corporate governance, emphasizing accountability and high degree of transparency which enable our stakeholders to have trust and faith in CALC to take care of their needs and to fulfill its social responsibility. In line with this commitment, CALC develops a communication channel for enquiries, feedback and complaints from inside and outside the company.

CALC 致力于维护良好的企业治理，强调问责制及高度透明的管理，以确保利益相关方对 CALC 有信心，相信 CALC 能满足其需求并履行社会责任。为践行此承诺，CALC 设立沟通渠道，受理公司内外部的咨询、反馈及投诉。

1.2 The purpose of formulating the Policy is to enhance the awareness of internal corporate justice and regard this as a kind of internal control mechanism. It provides reporting channels and guidance on reporting unlawful and unethical behavior or possible improprieties in the course of business operations and reassurance to persons reporting his or her concerns under this policy (“Whistleblowers”) of the protection that CALC will extend to them against unfair disciplinary action or victimization for any genuine reports made.

制定本政策旨在提升员工对企业内部公平性的认知，并将其视为内部控制机制的一环。本政策提供举报渠道与指引，用于举报业务营运中的违法、不道德行为或潜在不当行为，并向根据本政策举报的人士（「举报人」）保证：CALC 将保护其因真实举报免受不公正的纪律处分或迫害。

1.3 This policy applies to The China Aircraft Leasing Group Holdings Limited and their subsidiaries, joint ventures, associates or other related companies (collectively “CALC”).

本政策适用于中国飞机租赁集团控股有限公司及其子公司、合资企业、联营公司或其他关联公司（统称“CALC”）。

2. Policy 本政策

2.1 “Whistleblowing” refers to a situation in which stakeholders (e.g. lessees, suppliers, customers, creditors, etc.), consultant or an individual who have contract of service (including but not limited to employee, director, intern) with CALC decides to provide feedback or report serious concerns about any suspected misconduct, malpractice or irregularity within CALC. Whistle-blowing matters may include but are not confined to:

「举报」是指利益相关方（如承租人、供应商、客户、债权人等），顾问或与 CALC 签订雇佣合同的个人（包括但不限于员工、董事、实习生）其就 CALC 内部任何涉嫌不当行为、失职或违规行为提出反馈或举报。举报事项包括但不限于：

- a. Bribery and corruption 贿赂和腐败;
- b. Breach of legal or regulatory requirements 违反法律或监管要求;
- c. Breach of criminal and civil law which brings pecuniary or non-pecuniary loss to the company 违反刑事法律或为公司带来金钱/非金钱上损失的民事行为;
- d. Malpractice, impropriety or fraud relating to internal controls, accounting, auditing and financial matters 与内部控制、会计、审计和财务事项有关的失职、不当行为或欺诈;
- e. Endangerment of the health and safety of an individual 危害别人健康与安全的行为;

- f. Violation of the code of conducts applicable within CALC 违反 CALC 适用的行为准则;
- g. Improper conduct or unethical behaviour likely to prejudice the standing of CALC 可能损害 CALC 声誉的不当行为或不道德行为;
- h. Deliberate concealment of any of the above 故意隐瞒上述任何行为

3. Protection and Confidentiality 保护及保密制度

- 3.1 Whistleblowers or employees of CALC with assurance of fair treatment when the disclosure is made in good faith and in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety.
若举报人（含 CALC 员工）基于事实举报，且举报人合理相信举报内容涉及失职或不当行为，CALC 将保证其获得公平对待。
- 3.2 The identity of the individual making the report shall be kept confidential against the party being reported.
举报人身份应对被举报方保密。
- 3.3 CALC will make every effort to keep the Whistleblower's identity confidential. There may be circumstances, limited to regulatory/statutory obligation or a court order, in which it will be necessary to disclose the Whistleblower's identity to other relevant parties due to the nature of investigation, CALC will endeavor to inform the Whistleblower if his or her identity is likely to be disclosed.
CALC 将竭尽全力保密举报人的身份。但在特定情况下，仅限于监管/法定责任或法院命令，若因调查性质需向相关方披露举报人身份时，CALC 将在身份可能被披露前尽力告知该举报人。

4. False Report 虚假举报

- 4.1 All concerns must be raised in good faith. If a person makes a false report maliciously or for personal gain, the Company reserves the right to take disciplinary actions and other appropriate action against that person, including to law enforcement authorities and to recover any loss or damage as a result of the false report.
所有举报均须基于善意提出。如有人恶意或为个人利益作虚假举报，公司保留采取纪律处分、追偿损失及法律追诉的权利。

5. Reporting Channels 举报渠道

- 5.1 The Whistleblowers should make their reports to the Internal Audit & Corporate Compliance Division("IA"). Reports can be made in writing or, by prior appointment, in person. The contact details are as follows:

Addressee: Head of Internal Audit & Corporate Compliance
Address : China Aircraft Leasing Group Holdings Limited
32/F, Far East Finance Centre
16 Harcourt Road, Admiralty
Hong Kong

举报人应向内审及合规部提交举报。举报可采用书面形式或预约面谈。联络方式如下：

收件人：内审及合规部总监
地址：中国飞机租赁集团控股有限公司
远东金融中心32楼
金钟夏慤道16号
香港

For letter, please mark “Strictly Private and Confidential – To be Opened by Addressee Only” in the sealed envelope.

书面信件需密封标注：“私人及机密文件 – 仅收件人亲启”。

Email / 电邮: whistleblowing@calc.aero

Head of Internal Audit & Corporate Compliance should report all claims received to the Audit Committee on a timely basis.

内审及合规部总监应及时向审计委员会报告所有收到的申诉。

- 5.2 Whistleblowers should provide their names and contact details as well as the relevant verifiable evidence, so that clarification of the reports made or further appropriate information can be obtained directly from them when required. The identity of the individual making the report shall be kept confidential against the party being reported. Anonymous reports will only be considered as far as practicable. CALC reserves the right to determine whether the investigation would be conducted or not.

举报及投诉均应为实名制，举报人应提供其姓名及联络方式，且需提供可验证的证据，以便需要时可直接向其核实举报内容或获取补充信息。举报人身份会对被举报方保密。匿名举报仅在切实可行的情况下予以受理，CALC有权保留调查或不予调查的权力。

6. Investigation Procedures 调查程序

- 6.1 All allegations are recorded in a Whistleblowing register maintained by IA with the following information:

IA需在举报登记册中记录以下信息：

- a. Source of the allegation 指控来源;
- b. Brief description of the allegation 指控简述;
- c. Date when the allegation was received, reviewed and closed; and 收到/审查/结案日期;
- d. Investigation result 调查结果

- 6.2 Before the commencement of any investigation work, IA and Human Resources & Administration Division (“HRA”) will perform a preliminary screening to understand the allegation based on the information received from whistleblower.

内审及合规部与人力资源及行政部需基于举报信息进行初步筛查，评估指控性质。

- 6.3 In principle, IA is responsible for all reporting investigation. If the reporting relates to violation of the staff Code of Conduct, HRA will also participate the investigation. Advices may be obtained from internal legal staff where the preliminary investigation reveals non-compliance with applicable legal or regulatory requirements. Advice or assistance from other third party may also be sought if the investigation cannot be completed solely from internal resources. Other action such as reporting to law

enforcement authorities where necessary may be considered.

原则上，所有举报事项的调查将由内审及合规部执行，若举报涉及违反员工操守时，人力资源及行政部也会参与相关事项的调查。若初步调查发现存在违反适用法律或监管要求的情况，将先征询内部法律人员的意见。若调查无法仅凭内部资源完成，将会向第三方寻求建议或协助。在必要时，会考虑采取其他行动，例如向执法机关报备。

- 6.4 The investigation will be handled by IA and HRA in a confidential and timely manner. The objective of an investigation is to review and consider all relevant information relating to the allegation as quickly as possible and to draw an objective and impartial conclusion.

内审及合规部与人力资源及行政部将以保密、高效的方式执行调查。调查目的在于尽快审视及考量所有与指控相关的信息，并作出客观及公正的结论。

- 6.5 The investigation result together with recommendations will be reported to Management and Audit Committee. If the complaint is shown to be justified, the disciplinary or other appropriate company procedures will be invoked (with the assistance of e.g. responsible line management and HRA). Only those directly and legitimately involved in the complaint should be informed about the details of a complaint.

调查结果及相关建议将提交管理层和审计委员会。如投诉经查证属实，将启动纪律处分程序或其他公司治理程序（由涉事部门主管和人力资源及行政部协助执行）。仅允许直接参与调查且具合法知悉权的人员获取投诉详情。

- 6.6 The internal investigator does not have a strict responsibility to report the status or result to the whistleblower. The status or result of any investigation may be communicated to the whistleblower only when it is deemed necessary by the senior management.

内部调查人员并无强制义务向举报人通报调查进展或结果。仅在高级管理层判定有必要时，方可向举报人披露部分调查信息。

7. Policy Review 本政策的检视

- 7.1 The coverage and adequacy of this Policy shall be reviewed annually to ensure the whistleblowing mechanism remains relevant and effective. CALC has the final decision on the explanation of this policy and reserves the right to amend at any time and without prior notice.

本政策的适用范畴与有效性将每年进行审阅，以确保举报机制持续符合实际情况且有效。中国飞机租赁集团控股有限公司对本政策拥有最终解释权，并保留随时修改且无需事先通知的权利。

Where there are any discrepancies or differences of interpretation in the Policy between English text and Chinese translation, the English version shall prevail.

如本政策的英文版本与中文译本之间存在任何歧义或解释上的差异，应以英文版本为准。

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