

STARLITE AVIATION GROUP

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Starlite Aviation Group	:	Hereinafter refer to as the "Group"
Policy	:	WHISTLEBLOWING POLICY (THE "POLICY")

1 POLICY STATEMENT

The Group is committed to the highest possible standards of probity, openness and accountability and creating a safe and transparent culture. This policy establishes a framework for raising concerns about any instances of malpractice or unethical behaviour, in line with this commitment, within the Group.

2 WHO IS COVERED BY THE POLICY?

This Policy applies to all employees and stakeholders of the Group.

3 SCOPE OF THE POLICY

This Policy applies to the Group's employees and other stakeholders. It is intended solely for reporting matters of suspected malpractice or serious misconduct, not personal grievances, which are handled under the Group's Grievance Policy.

4 RESPONSIBILITY FOR THE IMPLEMENTATION OF THIS POLICY

Directors and employees are responsible for ensuring that they are aware of this Policy.

5 DEFINITION OF WHISTLEBLOWING

Whistleblowing means the good faith disclosure of information by an individual who has reasonable grounds to believe that the information demonstrates unlawful, unethical, unsafe, fraudulent or otherwise improper conduct, including any act or omission that breaches legal, regulatory, or organisational obligations.

Whistleblowing encourages and enables employees and other stakeholders to safely raise serious concerns within the Group rather than overlooking a problem. It provides a structured and effective channel for voicing concerns responsibly.

6 WHAT TYPES OF WHISTLEBLOWING ARE COVERED BY OUR POLICY?

The below list is non exhaustive.

- 6.1 Financial malpractice or fraud.
- 6.2 Failure to comply with a legal obligation or Statutes.
- 6.3 Improper conduct or unethical behaviour.
- 6.4 Breach of the Group's Code of Ethics.
- 6.5 Actions which are unprofessional or inappropriate or which conflict with a general understanding of what is right or wrong.
- 6.6 Endangering an individual's health and safety.

6.7 Damage to the environment.

6.8 Deliberate concealment of information about any of the above.

7 SAFEGUARDS

This Policy is designed to offer protection to employees and stakeholders of the Group, who disclose such concerns, provided the disclosure is made:

7.1 In good faith; and

7.2 In the reasonable belief of the whistleblower making the disclosure which tends to show malpractice or impropriety.

The decision to report a concern can be challenging. If the whistleblower reasonably believes that his/her claims are true, based on the information available, he/she should have no reason to fear.

The Group will not tolerate any form of harassment or victimization, including informal pressures, and will take appropriate measures to protect whistleblowers who report concerns in good faith.

In the event that the whistleblower believes he/she is being subjected to a detriment by any other person within the Group as a result of his/her decision to disclose, he/she must inform the whistleblowing champion and appropriate actions will be taken to protect the whistleblower.

If any individual attempts to discourage another employee or stakeholder from voicing a concern or if they criticize or victimize someone after a concern has been raised, he/she may be subject to disciplinary action.

8 CONFIDENTIALITY

All such disclosures will be treated in a confidential and sensitive manner. The identity of the whistleblower making the allegation may be kept confidential as long as it does not hinder any investigation. However, the investigation process may reveal the source of the information and the whistleblower making the disclosure may need to provide a statement as part of the evidence required.

8.1 Anonymous allegations

This Policy encourages whistleblowers to put his/her name to any disclosure he/she makes. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company on the following factors:

8.1.1 The seriousness of the issues raised;

8.1.2 The credibility of the concern; and

8.1.3 The likelihood of confirming the allegation from attributes sources.

8.2 Untrue allegations

If a whistleblower makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that whistleblower. In making a disclosure, the whistleblower should exercise due care to ensure the accuracy of the information.

If, however, a whistleblower makes untrue and vexatious allegations, disciplinary action and/or legal actions may be taken against that whistleblower.

9 WHISTLEBLOWING CHAMPION

The HR Manager will be designated as the whistleblowing champion. The name and the contact details of the whistleblowing champion are available in Annex 1.

The whistleblowing champion will act as an independent and impartial source of advice to whistleblowers or potential whistleblowers at any stage of raising a concern.

10 HOW TO RAISE A CONCERN?

Concerns should be raised in writing. The correspondence should set out the background and history of the concerns, giving names, dates and places where possible and the reason why the whistleblower is making the disclosure. If the individual does not feel able to make the disclosure in writing, an interview may be arranged.

Option 1 – For the employees

1. As a first step, the employee may normally raise concerns with his/her immediate supervisor/manager.
2. If the matter is not resolved, it should be reported to the whistleblowing champion.
3. If the matter concerns the whistleblowing champion, or the issue is still not resolved, the employee should report the matter to the Group Co Managing Directors. The name and the contact details of the Group Co Managing Directors are available in Annex 1.

Option 2 – For the stakeholders dealing with the Group and the employees

This may depend on the seriousness and severity of the issues involved and who is suspected of the malpractice.

1. In the event that a stakeholder dealing with the Group wishes to raise a matter or if an employee believes that his/her immediate supervisor/manager is involved, the whistleblower should approach the whistleblowing champion.
2. If the matter persists or concerns the whistleblowing champion, the whistleblower should approach the Group Co Managing Directors.

In the event the whistleblowing concerns the Group Co Managing Directors, the matter may be raised to the Chairman of the holding company. The name and the contact details of the Chairman of the holding company are available in Annex 1.

It shall be the policy of the Group to handle investigations promptly and fairly.

When an individual makes a disclosure, the Group will process any personal data collected as part of the investigation in line with protection laws prevailing in the respective jurisdiction, ensuring the data is stored securely and only accessed by those individuals essential for dealing with the disclosure.

11 POSSIBLE OUTCOMES AFTER REPORTING A CONCERN

There will be no adverse consequences for anyone who reports a whistleblowing concern in accordance with this Policy. However, any whistleblower found responsible for making allegation that is knowingly untrue and vexatious may be subject to disciplinary and/or legal action.

No action will be taken against a whistleblower who makes an inaccurate disclosure as the result of an honest error. No action will be taken against an accused person if an allegation is shown to be unfounded.

The whistleblower may be kept informed of the progress and of the outcome of the investigation, and will have the opportunity to provide additional information if need be, within the constraints of maintaining confidentiality and observing legal restrictions generally.

A confidential record on the steps taken will be kept and this will be in accordance with the data protection laws prevailing in the respective jurisdiction.

12 REVIEW

This Policy shall be reviewed as deemed necessary.

Annex 1 Contact Details

Whistleblowing Champion:

Name: Toneal O'Driscoll

Email: hr@starliteaviation.com

Address: Hangar 123, Virginia Airport, Durban North, 4051, South Africa

Group Co Managing Directors:

Name: Carla de Witt

Email: carla@starliteaviation.com

Address : 4th Floor, La Croisette Mall, Grand Baie, Mauritius

Name: Bruce Fraser

Email: brucef@starliteaviation.com

Address: Hangar 123, Virginia Airport, Durban North, 4051, South Africa

Chairman of the holding company:

Name: Thibault Nicodeme

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Address: Aerodrome d'Albertville 73460 Tournon, France