

# WESTSTAR WHISTLEBLOWING POLICY FAQs

(WASSB/P/IP/3/2017)



## A. INTRODUCTION

These FAQs aim to assist staff in understanding and applying Weststar Aviation Services (“WAS”) Corporate Disclosure Policy with its principles and guidelines. The Company staff members are in the frontline of WAS’s fight against misconduct and corruption. As such, staff’s conduct in and outside of the workplace should be in compliance with the Policy. While not meant to be all-encompassing, these FAQs provide pragmatic information to help staff perform their duties and responsibilities.

## C. BACKGROUND

The Integrity Policy aims to compliment the “Whistleblowing Policy & “Corporate Disclosure Policy” which collectively to accommodate the requirements by the local & international authority. It recognised other departmental policy which embedded to all

## D. FREQUENTLY ASKED QUESTIONS

### 1. Who is responsible for implementing the Integrity Policy?

*Ans* You are. Each staff member has an important role to play in WASSB’s fight against corporate misconduct, and each has a personal obligation to ensure the integrity of WASSB operations within their respective areas of responsibility

### 2. What other documents are relevant to WASSB’s Integrity policy?

*Ans* The Policy is to be read with Corporate Disclosure Policy and Whistleblowing Policy. These documents encourage positive corporate ethics and allow all employees to report any misconduct that breaches the terms of these policies.

### 3. What is misconduct, and how is it related to the Whistleblowing Policy?

*Ans* Misconduct includes, but is not limited to, the failure to observe the Staff Regulations, Administrative Circulars, safety, quality and health. Examples of misconduct include, but are not limited to, the following:

- (i) Fraud
  - Submitting false documents, such as resumes, bank guarantees, certificates of employment, or examination transcripts (misrepresentation);
  - Providing false information such as qualifications or work experience;
  - Fraudulently claiming rental subsidy when property is effectively owned by claimant;
  - Intellectual dishonesty, e.g., plagiarism, copyright infringement;
  - Soliciting and receiving payments on WASSB’s behalf.
- (ii) Abuse
  - Excessive use of e-mail and phone/fax facilities for private purposes;
  - Abusing sick leave privileges;
  - Abusing travel privileges;
  - Theft and embezzlement.
- (iii) Other Misconduct
  - Harassment;
  - Alcohol and drug abuse.<sup>1</sup> WASSB’s Drug & Alcohol Policy

### 4. What is the Annual Declaration of Compliance and what is it for?

*Ans* The Annual Declaration of Compliance is a mandatory on-line procedure for all staff members to formally certify that they have observed Weststar rules concerning staff conduct. In particular, a staff member:

## B. SCOPE

The FAQs policy applies to all WAS staff and all entities associated with the Company and its activities. In other words, it applies to all WAS-related activities, and to staff, borrowers, beneficiaries, bidders, suppliers, consultants, and contractors.

“WAS-related activity” includes finance, administration or support services, or any activity that materially affects or may affect or otherwise be relevant to the Company.

- (i) certifies that he/she has read and understood the following:
  - Staff employment terms and regulations,
  - Company SQAD Policy
  - Integrity Policy, Whistleblowing Policy and Corporate Disclosure Policy.
- (ii) declares whether or not he / she or his / her immediate family members have any assets or interests that might reflect unfavourably on WASSB or that might be in actual or apparent conflict with his / her duties as staff.

### 5. Who administers the Annual Declaration process?

*Ans* -

### 6. When should the Annual Declaration of Compliance be submitted?

*Ans* Staff will be requested to submit the Annual Declaration of Compliance to General Council / Compliance Manager through electronic system, email or hardcopy signatory.

The document shall be kept with the employee working file.

For new hire, HRAD shall lead the process with guidelines given by GC / CM.

### 7. What happens if a staff member fails to submit the Annual Declaration of Compliance?

*Ans* Submission of the Annual Declaration of Compliance is mandatory for all staff members regardless of type of appointment.

Failure to submit correct information in the Declaration will be considered a failure to observe an employment duty and may constitute misconduct.

### 8. Can I accept gifts?

*Ans* Giving or accepting gifts is not allowed if the intention is to obtain a favor or influence other persons’ performance of official duties.

As a general rule, WASSB staff members and their immediate family shall NOT accept benefits, favors, or gifts from sources external to WASSB with respect to any WASSB transaction. However, when you or members of your immediate family find it difficult to refuse or decline benefits, favors, or gifts, promptly disclose this in writing.

### **9. Can I accept invitations to speak in public?**

*Ans* As a general rule, you may not deliver any speech or presentation, broadcast to the public, except if appropriate authorization is obtained, or unless this is in the course of your normal official duties. You must also obtain authorization for external publications or speaking in your personal capacity about policies or activities of WASSB or any national political questions.

### **10. Do I have an obligation to report instances of integrity violations?**

*Ans* Yes, you do. WASSB staffs have an obligation to ensure the integrity of WASSB operations within their respective areas of responsibility and are specifically required to report allegations of integrity violations to GC / CM.

### **11. Do I have an obligation to report instances of integrity violations?**

*Ans* Report concerns or evidence of fraud or misconduct related to any WASSB-related activities or its staff to GC / CM by e-mail, mail, in person, or by telephone.

Disclosure can be made to ANY of the following reporting channels, in a strictly confidential manner:

- Email to **whistleblowing@weststar-aviation.aero**;
- Online submission through website, (link);
- In person to Director of Legal & Secretarial using the prescribed Whistleblowing Form.

You will be assigned with a reference number. Further communications will be conducted using the said reference number.

### **12. Can I report anonymously?**

*Ans* You are not obligated to disclose your identity when reporting allegations of fraud or corruption. If possible, provide a means by which GC / CM may contact you, such as an e-mail account using a pseudonym you have created for this purpose.

However, WAS recommends you to disclose the his / her identity to enable him/her to be accorded with the necessary protection and be informed on the outcome of the investigation.

### **13. What will happen if I file a report that turns out not to be true?**

*Ans* No one will be punished for reporting concerns in good faith in accordance with WASSB's rules, even if the concerns reported cannot be supported by additional evidence, or are ultimately found to be incorrect. This is also in accordance with WAS's Just & Fair Culture.

### **14. How does WASSB protect whistleblowers and witnesses?**

*Ans* The source of any allegation or evidence shall be treated with utmost confidentiality. GC / CM will do its utmost to encourage and protect whistleblowers and witnesses, and will protect their identities from unauthorized disclosure throughout and following an investigation.

### **15. Can I, as a Whistleblower later decide to withdraw my complaint?**

*Ans* Yes, you may withdraw your complaint by using the same channel of reporting you have chosen earlier. You will be required to furnish the reference number assigned to you and state your reason(s) for withdrawal.

### **16. Will I be required to assist in the investigation as a result of disclosure?**

*Ans* Yes. There will be instances where a Whistleblower may be called to assist in the investigation to provide more details / fact of his / her disclosure.