

chorus

Ethics Reporting Policy

Effective Date: August 5, 2025

ETHICS REPORTING POLICY

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1. Introduction

Chorus Aviation Inc. (the “**Corporation**”) is committed to a corporate environment that demonstrates and encourages ethical behaviour at all levels within the Corporation and each of its subsidiaries (collectively, “**Chorus**”). The Corporation has implemented this Policy to encourage the reporting of Misconduct (as defined below) in circumstances where an individual is uncomfortable reporting Misconduct directly to their manager or someone in the Human Resources or Legal Department of Chorus. This Policy defines what constitutes Misconduct, how it should be reported, the information that should be provided, who will be responsible for or involved in conducting the investigation, and the protections that will be afforded to Employees who submit a Report in good faith.

Capitalized terms used but not defined in the body of this Policy are defined in Appendix “A”.

2. Scope and Applicability

This Policy applies to all Employees who suspect, witness or become aware of any Misconduct.

“**Misconduct**” means any act or omission that has occurred or is about to occur and is within one or more of the following categories:

- (i) a misuse of Chorus’ funds or assets;
- (ii) gross mismanagement of Chorus’ resources;
- (iii) questionable and/or improper accounting, internal control or auditing practices or conduct (including fraud, deliberate error or misrepresentation);
- (iv) a violation of applicable laws or regulations;
- (v) a violation of Chorus’ corporate policies, including the Code of Ethics and Business Conduct; and
- (vi) Reprisal against an Employee.

Employees who are in doubt about whether an act or omission may be characterized as Misconduct under this Policy may consult with their manager, a member of the Human Resources or Legal Department of Chorus, or directly with the Compliance Officer.

The Compliance Officer may be reached by mail, e-mail or telephone as follows:

Mail:

Chorus Aviation Inc.
Legal Department
3 Spectacle Lake Dr., Ste. 380
Dartmouth, NS B3B 1W8
Attention: Compliance Officer

E-mail:

[\[omitted\]](#)

Telephone:

[\[omitted\]](#)

Third Parties who suspect, witness or become aware of Misconduct by an Employee are encouraged to report the Misconduct using the means specified at section 3.3 of this Policy. The remainder of this Policy, including the term “Reporter”, does not apply to Third Parties or Third-Party Submissions unless so indicated.

3. Procedures for Reporting Misconduct

3.1. Duty to Report

Ethical behaviour is everyone’s responsibility at Chorus. Chorus’ commitment to the highest standards of business conduct is reflected in its policies, procedures, guidelines and processes. Subject to applicable laws, all Employees who suspect, witness or become aware of Misconduct should immediately report it in accordance with section 3.3 of this Policy.

3.2. Safety Reporting

Through their Safety Management Systems, the Corporation’s subsidiaries offer channels for the reporting of safety incidents, errors, injuries, issues and hazards. Employees are encouraged and expected to promptly communicate, through those reporting channels, any information that may affect the safety, health or security of the operations and employees, or its key stakeholders, customers and the public. Employees should continue to report safety-related concerns or infractions immediately through those existing channels.

If an Employee believes that safety issues reported through the above channels are not being appropriately addressed, the Employee should report that concern in accordance with section 3.3 of this Policy.

3.3. Submitting a Report

Employees should feel free to report Misconduct to their manager or a member of the Human Resources or Legal Department of Chorus. However, it is recognized that in some circumstances, Employees may not feel comfortable raising Misconduct in this manner or may not be satisfied with how the Misconduct was addressed. In such circumstances, an Employee may report Misconduct using the facilities of ClearView, an independent third party, which provides dedicated communication mediums that are available year-round, 24 hours a day, seven days a week to receive Reports. Employees or Third Parties with information about Misconduct may submit their Report through one of the following ClearView channels:

- (i) Web site at www.clearviewconnects.com;
- (ii) Toll-free line: 1-866-506-6948 (North America)
- (iii) Skype audio call (in the Skype application, search for “Clearview Connects” and click to call); or
- (iv) Via mail addressed to ClearView Connects, P.O. Box 11017, Toronto, Ontario M1E 1N0.

Note: The above reporting channels are not an emergency response system. In the case of an emergency, please contact the appropriate local authorities.

All Reports submitted to ClearView will be immediately forwarded to the Compliance Officer for review and investigation with a copy to the Chair of the Audit Committee where required by this Policy.

All Third-Party Submissions will also be forwarded to the Compliance Officer for review with a copy to the Chair of the Audit Committee.

This distribution helps ensure that if one of the individuals who is a recipient of a Report is potentially involved in any aspect of the Misconduct, that individual would properly remove him / herself from any further involvement in the matter.

3.4. Information Needed to Support Investigation

Reporters should provide as much information as possible about the Misconduct. When providing information, Reporters are encouraged to identify themselves and include their contact information. This information will assist in the investigation of the matter, including any follow-up discussions that may be needed.

Reporters may submit their Report anonymously, and if they do, their choice will be respected. However, in some cases, it may not be possible to initiate or properly investigate a Report without the ability to communicate with the Reporter.

A Report should be factual and not speculative. It should contain sufficient, precise and relevant information to allow for the proper assessment of the situation, including its urgency. Without this information, an investigation may not be possible or warranted. Attached as Appendix “B” is a checklist (which is not meant to be exhaustive) of the types of information needed to facilitate a proper investigation.

The requirement to provide information as set out above also applies to Third-Party Submissions.

3.5. Report Involving Senior Leaders

If a Report or Third-Party Submission alleges Misconduct by a member of the Board of Directors or an Executive Officer, the Chair of the Audit Committee will, to the extent that she or he is not implicated in the Misconduct, determine how to proceed. If the Chair of the Audit Committee is implicated in the Misconduct, the Compliance Officer must promptly forward the report to one or more members of the Board of Directors who is not implicated in the Misconduct and that person or persons will determine how to proceed. In determining how to proceed, the responsible person or persons may, among other things, instruct the Compliance Officer or an external investigator to investigate the Misconduct alleged in the Report.

4. Reprisal

4.1. Reprisal Protection

Employees who act in good faith will not be disciplined, discharged, demoted, suspended, threatened, harassed, harmed in any other manner, discriminated against or subjected to any other Reprisal as a result of:

- (i) submitting a Report;
- (ii) seeking guidance on how to handle Misconduct; or
- (iii) assisting with the investigation of Misconduct.

Appropriate disciplinary action (which, depending on the circumstances, may include termination of employment) may be taken against any Reporter if she or he has taken part in Misconduct or submitted a Report that is determined to be an Improper Report (as further described in section 6 below).

Employees who believe that they have been the subject of Reprisal should immediately report their concern to the Compliance Officer directly or via one of the ClearView solutions.

4.2. Reprisal Remedies

If an investigation pursuant to this Policy determines that the Reporter has been subject to Reprisal, Chorus will take the following actions (as appropriate) to address the impact of the Reprisal on the Reporter:

- (i) rescind any disciplinary action taken against the Reporter because of the Reprisal;
- (ii) permit the Reporter to return to her or his duties; and
- (iii) reimburse the Reporter for any reasonable and verifiable out-of-pocket costs incurred by the Reporter as a direct result of the Reprisal.

5. Investigations

All Reports of Misconduct will be taken seriously and will be handled in a fair and timely manner.

The Compliance Officer or the Chair of the Audit Committee (or such other independent person, as the circumstance may warrant) will promptly investigate, or cause to be investigated, all Reports, provided sufficient information has been submitted.

All Third-Party Submissions will also be investigated, provided that the Compliance Officer and/or the Chair of the Audit Committee determine, in their sole discretion, that such an investigation is required and sufficient information has been provided.

All Employees have a duty to cooperate in the investigation of Misconduct (including any Reprisal). Employees will be subject to disciplinary action, up to and including termination of employment, if they fail to cooperate in an investigation or deliberately provide false information during an investigation.

If, at the conclusion of its investigation, Chorus determines that Misconduct has taken place, it will take remedial action. This action may include disciplinary action against the party found to have taken part in the Misconduct, up to and including termination of employment. Appropriate steps will also be taken to prevent the Misconduct from happening again.

6. Improper Report

No Reporter should misuse this Policy by, among other things, making an Improper Report. An Improper Report will be viewed as Employee misconduct and will be subject to appropriate disciplinary action, which, depending on the circumstances, may include termination of employment for just cause.

Third Parties must also refrain from submitting information in bad faith or that is frivolous, false or misleading. Third Parties who make any such submissions could be subject to legal action by Chorus.

7. Confidentiality

ClearView, members of the Board of Directors, and all Employees who participate in, are made aware of, or are otherwise involved in any way in, any investigation under this Policy, including investigations of Third-Party Submissions, shall:

- (i) keep information relating to any investigation under this Policy confidential; and
- (ii) refrain from discussing any Report (or Third-Party Submissions) or the fact of their involvement in an investigation;

except to the extent required to properly investigate or resolve any alleged Misconduct, or to fulfil any obligation or exercise any right to report alleged Misconduct under applicable law.

The existence or specifics of a Report or Third-Party Submission may be shared with:

- (i) members of the Board of Directors, the Chief Executive Officer, the Chief Financial Officer and the Chief Legal Officer, in each case of the Corporation (except to the extent any one of them is implicated in the alleged Misconduct);
- (ii) Employees who have a need to know the specifics of the Report in order to assist with the investigation or resolution of the alleged Misconduct;
- (iii) external professional advisers engaged to assist with the investigation or resolution of the alleged Misconduct;
- (iv) Chorus' internal and external auditors;
- (v) Chorus' insurers and/or brokers; and
- (vi) Chorus' lenders and other parties to whom Chorus has a contractual obligation to disclose Misconduct.

8. Compliance Officer

The Compliance Officer shall be appointed by the Chief Executive Officer of the Corporation and be responsible for:

- (i) overseeing the administration of this Policy and maintaining appropriate records;
- (ii) receiving, recording and reviewing Reports and Third-Party Submissions;
- (iii) conducting investigations in accordance with and subject to this Policy;
- (iv) determining, where appropriate, if there are sufficient grounds for further action and review;
- (v) alerting the Chair of the Audit Committee of any Report or Third-Party Submission that requires her or his prompt attention;
- (vi) alerting the Board of Directors where a Report or Third-Party Submission concerns the conduct of the Chair of the Audit Committee; and
- (vii) reporting to the Audit Committee on the status of all Reports and Third-Party Submissions received in each fiscal quarter and how material matters (if any) were resolved.

The Compliance Officer may, where appropriate, engage the assistance of one or more delegates to assist in carrying out her or his responsibilities in this Policy, including members of the Human Resources and Legal Department.

The Compliance Officer shall have the authority to obtain any record or information, including any data in electronic form, necessary to carry out her or his duties under this Policy, provided that such record or information belongs to Chorus or is in the lawful custody or control of Chorus. All employees, contractors and professional advisers of Chorus must comply with any request for information of the Compliance Officer provided that such request is endorsed by any one of the following people: (a) a member of the Board of Directors; (b) the Chief Executive Officer of the Corporation; or (c) an officer who reports directly to the Chief Executive Officer of the Corporation.

Appendix “A”
Additional Defined Terms

“Audit Committee” means the Audit, Finance and Risk Committee of the Board of Directors.

“Board of Directors” means the Board of Directors of the Corporation.

“Chief Legal Officer” means the individual, appointed by the Board of Directors, who holds the position of Chief Legal Officer or General Counsel of the Corporation.

“Clearview” means ClearView Strategic Partners Inc.

“Compliance Officer” means an individual, appointed by the Chief Executive Officer of the Corporation, who is responsible for administering this Policy.

“Employee” means an employee of the Corporation or any of its subsidiaries.

“Executive Officer” means the Chief Executive Officer of the Corporation and any officer of Chorus who reports directly to the Chief Executive Officer of the Corporation.

“Improper Report” means a Report that is frivolous, contains false or misleading information, or is made in bad faith, and includes, but is not limited to, providing false information, submitting a Report that the Reporter knows is baseless, or submitting repeated Reports concerning matters that have been previously examined and resolved.

“Policy” means this Ethics Reporting Policy.

“Report” means a report of Misconduct submitted by a Reporter in accordance with this Policy.

“Reporter” means an Employee who submits a Report pursuant to this Policy.

“Reprisal” means any of the following actions taken against an Employee by reason that the Employee has, in good faith, submitted a Report under this Policy or has, in good faith, cooperated in an investigation carried out under this Policy:

- (i) a disciplinary measure including demotion or termination;
- (ii) any measure that adversely affects the employment or working conditions of the Employee; or
- (iii) a threat to take any of the measures referred to in any of paragraphs (i) or (ii) above.

“Third Parties” or **“Third Party”** is any individual who is not an Employee of Chorus, and includes customers, suppliers, contractors, advisers, and consultants.

“Third-Party Submission” means a report of Misconduct submitted by a Third Party pursuant to this Policy.

Appendix "B"
Report Checklist

1. A description of the Misconduct.
2. The name of person(s) involved, including witnesses and their contact information.
3. The Reporter's relationship to the person(s) involved in the Misconduct.
4. A detailed account of the events that took place, or may take place, including the date(s) and place(s) of those events and the person(s) involved.
5. The Reporter's rationale for why the incident may constitute Misconduct.
6. The steps, if any, the Reporter has taken prior to reporting the Misconduct, including discussions with a manager and the actions taken by the manager.
7. Whether any other individuals or organizations are aware of the Misconduct.
8. Any additional documentation or other information that is available to support the Report.