

Air Lease Corporation

Notice of Amendment and Restatement of the Code of Business Conduct and Ethics

On November 2, 2022, the Board of Directors of Air Lease Corporation (the “Company”) approved an amended and restated Code of Business Conduct and Ethics (the “Code”). The Code applies to all employees, officers and directors of the Company and its subsidiaries. The Code was revised and updated to reflect current best practices, improve readability, enhance understanding of the Company’s standards of ethical business practices, and promote awareness of ethical issues that may be encountered in carrying out an employee’s or director’s responsibilities. Changes to the Code include, among others, updates to the “Financial Reports and Other Records” section to provide more specific guidance on the Company’s expectations for disclosure and reporting, clarifies that the Code does not prevent disclosure of information in compliance with the Company’s Whistleblower Policy, conforms the Company’s insider trading guidance to the Company’s current Insider Trading Policy, and clarifies the Company’s policy with respect to waivers of the Code.

The updated Code does not materially change the responsibilities and obligations that previously applied to employees and directors. The newly adopted Code did not result in any explicit or implicit waiver of any provision of the Company’s prior Code.

The foregoing summary of the nature of the amendments to the Code is qualified in all respects by reference to the full text of the Code, a copy of which has been posted at: <https://airleasecorp.com/corporate-responsibility>.