

# Human Rights Policy

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*This Human Rights Policy (the “Policy”) represents the commitment of Air Lease Corporation and its subsidiaries (“ALC”) to upholding human and workplace rights. We expect each aspect of this Policy to be upheld throughout our organization.*

*While parts of this Policy reflect our review of working standards and human rights concepts advanced by other groups, such as the Universal Declaration of Human Rights, this Policy represents ALC's statement of its own standards on these subjects, rather than those of a third party. The concepts in this Policy are generally derived from ALC's policies and practices already in place, but which have not previously been summarized in a single document.*

*Given we are a global business, circumstances can arise where legal, regulatory or other requirements may necessitate applying or interpreting this Policy in ways that assure compliance with applicable local law. Despite these occurrences, we believe that the concepts in this Policy represent important fundamental values that should underlie all aspects of the employment relationship.*

## **Non-Discrimination and Harassment**

ALC works to maintain a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited. We require each employee to treat all colleagues in a respectful manner and to forge working relationships that are uniformly free of bias, prejudice and harassment. We prohibit discrimination against or harassment of any employee on the basis of race, color, ethnicity, religion, sex or gender, sexual orientation, gender identity or expression, pregnancy, marital status, national origin, citizenship, military and veteran status, ancestry, age, physical or mental disability, medical condition, genetic information, or any classification protected by applicable federal, state or local law. Any employee who is found to have discriminated against another employee is subject to discipline up to and including termination. No individual will suffer any reprisals or retaliation for making complaints or reporting any incidents of discrimination or perceived discrimination, or for participating in any investigation of incidents of discrimination or perceived discrimination.

## **Freedom of Association and Collective Bargaining**

We recognize and respect employee rights to join or not join any lawful organization of their own choosing. We are committed to complying with laws pertaining to freedom of association, privacy and collective bargaining.

## **Environment, Health and Safety**

We work to conduct business activities and operations in a manner that promotes protection of people and the environment to the extent practicable. Compliance with all applicable laws, rules and regulations governing health, safety and the environment is a responsibility of management and employees in all functions.

## **Work Hours, Wages and Benefits**

We seek to provide employees with compensation and benefits that are fair and equitable for the type of work and geographic location where the work is being performed, and competitive with other world-class companies. We work to ensure full compliance with applicable wage, work hours, overtime and benefits laws.

## **Expectations for our Suppliers**

We are committed to the highest standards of ethical and business conduct as it relates to the procurement of goods and services. ALC's [Supplier Code of Conduct](#) sets forth our expectations for the suppliers, vendors and other providers of these goods and services with which we do business.

## **Slavery, Human Trafficking, Forced Labor and Child Labor**

We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking. We prohibit the hiring of individuals that are under 18 years of age.

## **Guidance and Reporting**

We promote a work environment in which open and honest communication among employees is encouraged, valued, and respected. We regularly provide training to our employees highlighting our commitment to open and honest communication, our anti-retaliatory policy and various means to communicate concerns including by using Report It, which is an independent, third-party anonymous hotline service, available 24 hours a day.

Effective August 2021