

Non-Harassment Policy

Harassment in employment, including sexual, racial and ethnic harassment, because 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 (40 or over), physical or mental disability (an impairment that limits a major life activity), medical condition (cancer-related or genetic characteristic), genetic information, as well as any other harassment forbidden by law, is strictly prohibited by Air Lease Corporation and its subsidiaries (the "Company"). Employees who violate this policy are subject to discipline, including possible termination.

- "Gender Expression" means a person's gender-related appearance or behavior whether or not stereotypically associated with the person's sex assigned at birth.
- "Gender Identity" means a person's identification as male, female, a gender different from the person's sex assigned at birth, transgender, or no specific gender at all (e.g., nonbinary).
- "Sex" includes, but is not limited to, pregnancy; childbirth; medical conditions related to pregnancy, childbirth, or breastfeeding; gender identity; sexual orientation; and gender expression.
- "Transgender" is a general term referring to a person whose gender identity differs from the person's sex assigned at birth. A transgender person's gender expression may or may not align with societal norms for their sex assigned at birth. A transgender person may or may not identify as "transsexual," but individuals should not refer to another as "transsexual" unless that person has previously identified themselves as such.
- "Race" includes a person's ancestry, color, ethnic group identification, ethnic background, and the natural hairstyles associated therewith, including dreads, twists, locs, and afros.

Forms of prohibited harassment include, but are not limited to:

- Visual conduct, including displaying of derogatory objects or pictures, cartoons, or posters; or
- Verbal conduct, including making or using derogatory comments, epithets, slurs, and jokes.

In addition, sexual harassment is defined by the regulations of the Fair Employment and Housing Commission as unwanted sexual advances, or visual, verbal, or physical conduct of a sexual nature. Sexual harassment includes gender harassment and harassment on the basis of pregnancy, childbirth, or

related medical conditions, and also includes sexual harassment of an employee of the same gender as the harasser. This includes, but is not limited to, the following types of offensive behavior:

- Unwanted sexual advances;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct, including leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, or posters;
- Verbal conduct, including making or using derogatory comments, epithets, slurs, and jokes;
- Verbal sexual advances or propositions;
- Verbal abuse of a sexual, racial, or other prohibited nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, emails, texts, notes, or invitations;
- Physical conduct, including touching, assault, impeding or blocking movements; and
- Using nicknames or terms of endearment with a racial, sexual or other prohibited connotation.

Examples of sexual harassment include (a) an employee being fired or denied an employment benefit because the employee refused to grant sexual favors or because he or she complained about the harassment; (b) an employee reasonably quitting his or her job to escape harassment; or (c) an employee being exposed to a hostile work environment. Conduct need not be motivated by sexual desire to be considered sexual harassment. However, an employee need not show that their work performance was impacted by the harassment, and a single incident or remark may constitute unlawful harassment.

Managers and supervisors are prohibited from providing favorable treatment to employees with whom they are involved in a consensual sexual relationship, and from retaliating against employees with whom they have or previously had a romantic relationship. All employees may be personally liable for their own harassment, even as a rank and file employee.

Complaint and Investigation Procedure

Regardless of whether the action occurred on or off Company premises, if you believe that you have been discriminated against or you have been harassed by a co-worker, supervisor, agent, vendor, customer, or other third parties or

visitors; have witnessed possible discrimination and/or harassment; or if you believe that the Company or another employee has violated any applicable law in conducting the Company's business, you have a duty to immediately bring the incident(s) to the attention of your supervisor. If you do not feel that the matter can be discussed with your supervisor, you should contact Human Resources or an Officer of the Company and arrange for a meeting. Any supervisory or managerial employee who receives such a complaint must promptly report it to an Authorized Officer. You may also report your complaint of harassment to Report It, which is an independent, third-party anonymous hotline service, available 24 hours a day.

We know how difficult it can be to come forward and report these incidents, but the timelier the report, the better the chance that the Company can properly investigate, accurately determine what occurred, and take corrective action as needed.

The description of the incident(s) can be given verbally or in writing.

The matter will be thoroughly investigated, with confidentiality maintained to the extent possible. We will track and document all steps in the investigation process. After reviewing the evidence, a determination will be made concerning whether reasonable grounds exist to believe that discrimination, harassment, and/or a violation of law has occurred. It is the obligation of all employees to cooperate fully in the investigation process. The persons involved will be advised of the determination if appropriate.

The Company will take action to deter any future discrimination, harassment, and/or any violations of law that are found. The Company considers any discrimination, harassment, and/or violations of law to be a serious offense which can result in disciplinary action for the offender, up to and including discharge. In addition, disciplinary action will be taken against any employee who attempts to discourage or prevent another employee from bringing discrimination, harassment, and/or a violation of law to the attention of management or participating in an investigation thereof.

The Company wants to assure all of its employees that measures will be taken to protect those who complain about discrimination, harassment, and/or a violation of law from any coercion, intimidation, or retaliation due to their reporting an incident or participating in an investigation or proceeding concerning such an incident. The Company will provide appropriate options for remedial actions and resolution when warranted and will provide a prompt response to any complaint.

If you believe that the above procedure has not resolved a complaint of discrimination or harassment, you may contact the California Department of Fair Employment and Housing (DFEH) at (800) 884-1684 to determine the location of the branch of the DFEH that is nearest to you to file a claim within three (3) years of the date that the discrimination and/or harassment occurred. The DFEH serves as a neutral fact finder and will attempt to assist the parties to voluntarily resolve

their dispute. In the event that the DFEH is unable to obtain voluntary resolution and finds that discrimination and/or harassment has occurred, the Fair Employment and Housing Commission (FEHC) may hold a hearing and award reinstatement, back pay and monetary damages.

No action will be taken against you in any manner for filing a complaint with, or otherwise participating in an investigation, proceeding or hearing conducted by the DFEH or the FEHC with respect to discrimination or harassment.

Effective August 2021