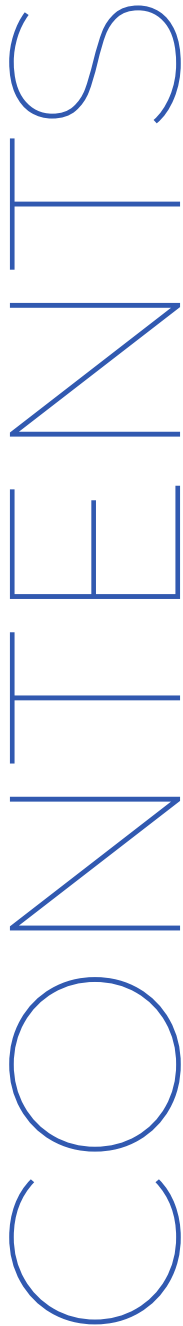




Discrimination, Harassment, Retaliation, and Inappropriate/Unlawful Conduct Statements

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EQUAL EMPLOYMENT OPPORTUNITY AND AFFIRMATIVE ACTION

Equal Employment Opportunity and Affirmative Action

Equal Employment Opportunity has been and will continue to be, a fundamental principle at AerSale, where we diligently work to ensure employment decisions are based upon personal capabilities and qualifications without discrimination on the basis of actual or perceived race, religion, color, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or gender expression (including transgender status), national origin, ancestry, citizenship status, age, physical or mental disability, protected medical condition as defined by applicable state or local law, genetic information, sexual orientation, marital status, military service and veteran status, or any other characteristics protected by applicable federal, state, or local laws and ordinances. These commitments are exemplified in all of our management practices and decisions, including recruitment and hiring practices, appraisal systems, compensation benefits, promotions, training/career development programs, employee activities, access to facilities and programs, general treatment of employee during employment and all other terms and conditions of employment.

In addition, in accordance with Title II of the Genetic Information Nondiscrimination Act of 2008 ("GINA"), applicants and employees of AerSale will be protected from discrimination based on genetic information in all of our management practices and decisions, including recruitment and hiring practices, appraisal systems, compensation benefits, promotions, training/career development programs and all other terms and conditions of employment. AerSale also complies with GINA employer restrictions on employers' acquisition of genetic information and strictly limits disclosure of genetic information. Genetic information includes information about genetic tests of applicants, employees, or their family members; the manifestation of diseases or disorders in family members (family medical history); and requests for or receipt of genetic services by applicants, employees, or their family members.

AerSale takes Affirmative Action to insure that applicants and employees covered under Executive Order 11246 and/or the Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, 38 U.S.C. 4212, Section 503 of the Rehabilitation Act of 1973, are not discriminated against because of their race, religion, color, sex (including pregnancy and gender identity and transgender, or expression), national origin, age, disability, family medical history, genetic information, sexual orientation, parental status, marital status, protected veteran status, or any other classification prohibited by established law and affirmatively seeks to advance the principle of equal employment opportunity. All qualified applicants and employees will receive consideration for employment without regard to their disability or protected veteran status. We continually seek to recruit, hire, promote, train, motivate and maintain a workforce that reflects the rich diversity of the community in which we live and conduct business. All qualified applicants will receive consideration for employment without regard to their "disability" or "protected veteran status." AerSale prohibits job discrimination and requires affirmative action in all of our management practices and decisions, including recruitment and hiring practices, appraisal systems, compensation benefits, promotions, training/career development programs and all other terms and conditions of employment for disabled veterans, recently separated veterans (within three years of discharge or release from active duty), other protected veterans (veterans who served during a war

or in a campaign or expedition for which a campaign badge has been authorized), and Armed Forces service medal veterans (veterans who, while on active duty, participated in a U.S. military operation for which an Armed Forces service medal was awarded).

AerSale, maintains a written Affirmative Action Program (“AAP”), portions of which are made available to prospective employees and employees upon request. All employment actions will be analyzed to ensure that this policy and the AAP are being properly implemented. AerSale is determined to be in full compliance with the provisions of the law and the AAP.

Affirmative action is not preferential treatment. Nor does it mean that unqualified persons are hired or promoted over other people. What affirmative action does mean is that positive steps must be taken to provide equal opportunity for those whom society may have discriminated against in the past and who may continue to suffer the effects of that discrimination.

In accordance with Title I and Title V of the Americans with Disabilities Act of 1990, as amended, as well as section 503 of the Rehabilitation Act of 1973, as amended, and The Vietnam Era Veterans' Readjustment Assistance Act of 1974, as amended, the above Equal Employment Opportunity Statement and AerSale's AAP executed simultaneously reflects AerSale's attitude and its intention to:

1. Recruit, hire, train and promote for all job classifications without regard to race, religion, color, sex (including pregnancy and gender identity and transgender, or expression), national origin, age, disability, family medical history, genetic information, sexual orientation, parental status, marital status, protected veteran status, or any other classification prohibited by established law and affirmatively seeks to advance the principle of equal employment opportunity. All qualified applicants will receive consideration for employment without regard to their “disability” or “protected veteran status.” We continually seek to recruit, hire, promote, train, motivate and maintain a workforce that reflects the rich diversity of the community in which we live and conduct business.
2. Base decisions on employment so as to further the principles of equal employment opportunity.
3. Ensure that promotion decisions are in accordance with the principles of equal employment.
4. Provide affirmative action to employ and advance in employment qualified applicants and employees.

All management and Supervisory personnel are expected to set an example for AerSale by intensifying our efforts on a continuing basis to attract and upgrade members of minority groups, women, qualified disabled individuals or qualified disabled veterans or Vietnam Era veterans for positions in all job categories and at all levels.

Equal employment opportunity notices are posted near employee gathering places as required by law. These notices summarize the rights of employees to equal opportunity in employment. Responsibility for insuring compliance with this has been assigned to the Vice President of Human Resource, who serves as AerSale's Equal Employment Opportunity and Diversity Coordinator. Employees with questions or anyone who feels that one has been subjected to one of these forms of discrimination or retaliation must contact the Vice President of Human Resource or a Human Resource Officer. A complaint form is available for employee use on:

employee portal. Employees may also contact the Ethics Monitor in by email at ethics@aersale.com, or by mail at Attention: Ethics Department or AerSale's Corporate Counsel in Coral Gables by email at legal@aersale.com, or by mail at Attention: Legal Department.

AerSale prohibits any form of retaliation against an employee or third party who files a complaint of discrimination, participates in an OFCCP proceeding, or otherwise opposes discrimination. Appropriate disciplinary action may be taken against any employee willfully violating this.

DISCRIMINATION, HARASSMENT, RETALIATION, AND INAPPROPRIATE CONDUCT.

Discrimination, Harassment, Retaliation, and Inappropriate Conduct

AerSale is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, AerSale expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice, and harassment. Therefore, the management of AerSale does not, and will not, tolerate discrimination, harassment, retaliation, or inappropriate conduct of, or by, our employees, contractors, consultants, agents, applicants, clients, or vendors.

The term “harassment” includes, but is not limited to, slurs, jokes, and other verbal, visual, or physical conduct relating to an individual’s actual or perceived race, religion, creed, color, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity and gender expression (including transgender status), national origin, ancestry, citizenship status, age, physical or mental disability, protected medical condition as defined by applicable state or local law, genetic information, sexual orientation, marital status, military service and veteran status, or any other characteristics protected by applicable law (“protected characteristics”).

“Harassment” may include a range of subtle and not so subtle behaviors and also includes unwelcome or unwanted sexual advances, requests or demands for favors, offensive touching, and other types of conduct whether it be physical, verbal, visual, or electronic communication (including e-mail and facsimiles) of a harassing or sexual nature involving individuals of the same or different gender. This includes, but is not limited to:

- Unwelcome or unwanted physical contact or sexual advances including, but not limited to, patting, grabbing, pinching, brushing-up against, hugging, cornering, kissing, fondling, or any other similar physical contact.
- Unwelcome requests or demands for favors including, but not limited to, subtle or blatant expectations, pressures, requests or demands for sexual, unethical, or illegal favors, or unwelcome requests for dates. Such unwelcome requests or demands may or may not relate to an implied or stated promise of preferential treatment, or a threat of negative consequences concerning employment, including promotion, demotion, transfer, layoff, termination, pay or other form of compensation, and selection for training.
- Verbal and written abuse or unwelcome kidding including, but not limited to, that which is sexually-oriented, including same-sex harassment; commentary about an individual’s body, sexual prowess or sexual deficiencies, inappropriate comments about race, religion, color,

sex (including pregnancy and gender identity and transgender, or expression), national origin, age, disability, family medical history, genetic information, sexual orientation, parental status, marital status, protected veteran status, or any other classification prohibited by established law; dirty jokes or other jokes which are unwanted and considered offensive or tasteless; or comments, innuendoes, epithets, slurs, negative stereotyping, leering, catcalls or other actions that offend, whether sexually oriented or otherwise related to a prohibited form of discrimination or harassment.

- Any form of behavior that unreasonably interferes with work performance, including, but not limited to, unwanted sexual attentions, comments, interruptions, or other communications, whether sexually oriented or otherwise related to a prohibited form of discrimination or harassment, that reduces productivity or time available to perform work-related tasks.
- Actions that create a work environment that is intimidating, hostile, abusive, or offensive because of unwelcome or unwanted conversations, suggestions, requests, demands, physical contacts or attentions, whether sexually oriented or otherwise related to a prohibited form of discrimination or harassment.
- The distribution, display, or discussion of any written or graphic material, including calendars, posters, cartoons, or names, that belittles or shows hostility or aversion toward an individual, the employee's relatives, friends or associates or a group because of race, religion, color, sex (including pregnancy and gender identity and transgender, or expression), national origin, age, disability, family medical history, genetic information, sexual orientation, parental status, marital status, protected veteran status, or any other classification prohibited by established law.

All employees and applicants are covered by this and are strictly prohibited from engaging in any form of discriminatory, harassing, or retaliatory conduct. Further, no employee has the authority to suggest to another employee or applicant that the individual's employment, continued employment, or future advancement will be affected in any way by entering into, or refusing to enter into, a personal relationship. Such conduct is a direct violation of this.

Conduct prohibited by this is unacceptable in the workplace and in any work-related setting outside the workplace, such as business trips, business meetings and business-related social events.

Normal, courteous, mutually respectful, pleasant, and non-coercive interactions between employees, vendors, clients that are acceptable to all parties are not considered to be prohibited harassment.

Violation of this will subject an employee to disciplinary action, up to and including immediate discharge.

Retaliation is Prohibited

AerSale prohibits retaliation against any individual who in good faith reports discrimination, harassment, or conduct, which may be inappropriate or unlawful. Employees are also protected

against retaliation for participating in an investigation of discrimination, harassment, or inappropriate/unlawful conduct. Retaliation against an individual for reporting any such conduct or for participating in an investigation of a claim of such conduct is a serious violation of this and will be subject to disciplinary action, up to, and including, termination.

Reporting Procedures and Investigation

AerSale requires that all employees immediately report in writing incidents of discrimination, harassment, or retaliation, regardless of the offender's identity or position (be it a Supervisor, Manager, employee, contractor, consultant, client, vendor, or other third party). Individuals who believe they have experienced conduct that is contrary to AerSale's Culture or who have concerns about such matters must file their complaints immediately with the Vice President of Human Resources or Human Resource Officer, whereupon the matter will be discreetly and thoroughly investigated, to the extent possible. However, complete confidentiality may not be possible in all circumstances. If the alleged harasser is an employee's immediate Supervisor, the employee is required to submit their complaint to the Vice President of Human Resources or a Human Resource Officer. We encourage all employees to put their complaint in writing. A complaint form is available for employee use on employee portal. Employees may also contact the Ethics Monitor in Coral Gables by email at ethics@aersale.com, or by mail at Attention: Ethics Department or AerSale's Corporate Counsel in Coral Gables by email at legal@aersale.com, or by mail at Attention: Legal Department.

AerSale will then take immediate steps to stop any behavior which violates this and see that it does not repeat itself. Disciplinary action, up to, and including termination, calculated to end the discrimination or harassment, will be taken, when appropriate. *Employees who have experienced conduct they believe is contrary to this have an obligation to take advantage of this complaint procedure. An employee's failure to fulfill this obligation could affect the employee's rights in pursuing any claim.*

Early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of discrimination, harassment, or retaliation. Therefore, AerSale expects employees to immediately report such conduct so that rapid and constructive action can be taken.

The availability of this complaint procedure does not preclude individuals who believe they are being subjected to prohibited conduct from promptly advising the offender that the behavior is unwelcome and requesting that it be discontinued.

Responsive Action

Conduct constituting harassment, discrimination or retaliation will be dealt with appropriately. Responsive action may include training, referral to counseling and/or disciplinary action (such as warning, reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without pay or termination), as AerSale determines is appropriate under the circumstances.

Any person utilizing this complaint resolution procedure will be treated courteously, and the problem will be handled swiftly and as confidentially as possible in light of all the circumstances, with appropriate corrective action being taken. The registering of a good faith complaint will in no way be used against the complaining individual, nor will it have an adverse impact on their employment status.

Conclusion

Individuals who have questions or concerns about this may speak with the Vice President of Human Resource. Please keep in mind that the very nature of discrimination, harassment, and retaliation makes it virtually impossible to detect unless a complaint is appropriately reported. Do not assume AerSale is aware of a particular problem or concern. It is an employee's responsibility to bring forth information to the attention of the Vice President of Human Resources or a Human Resource Officer so the issue may be addressed.

Finally, this should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions in order to avoid allegations of harassment. The law and the policies of AerSale prohibit disparate treatment on the basis of sex or any other protected characteristic with regard to terms, conditions, privileges, and perquisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to compliment and further these policies, not to form the basis of an exception to them.

Open Door

AerSale appreciates and understands that only with an open and free exchange of ideas will AerSale and the employees grow and continue to prosper. When people of good will join together with the purpose of making their work experience as pleasant as possible, any misunderstandings that may arise can be settled promptly and fairly.

In most cases, an employee's immediate Supervisor is the first person with whom they should discuss any questions or problems that arise. However, if an employee feels they cannot discuss their particular problem with their Supervisor, the employee may direct their concerns to the Department Manager. If the employee does not feel comfortable directing their concerns to either their Supervisor or Department Manager, they may direct their concern to the Vice President of Human Resources or a Human Resource Officer. An employee's Supervisor or Department Manager and the Vice President of Human Resources or Human Resource Officer will assist in resolving the problem and will consult with management in an attempt to reach a solution that is fair and equitable to all parties. An employee is required, in all cases, to share their concerns or complaints with a Human Resource Officer of their choice so that Human Resources can follow up and ensure resolution.

A **Complaint Form** is available for your completion on: EMPLOYEE PORTAL. Employees may also contact the **Ethics Monitor** in Coral Gables at, by email at ethics@aersale.com, or by mail at Attention: Ethics Department or AerSale's Corporate Counsel in Coral Gables by email at legal@aersale.com, or by mail at Attention: Legal Department.

The employee's position will not be jeopardized due to bringing an issue or concern to Management's attention. An employee may not always receive the response they want; however, the employee may learn why a particular action can or cannot be taken. A sincere, conscientious effort will be made to try to resolve any and all problems or areas of concern expressed by an employee.

Ethics Hotline (email)

Purpose:

AerSale is committed to the highest possible standards of ethics, integrity, and legal business conduct. All employees are required to comply with AerSale policies and procedures, governmental rules and regulations and all compliance programs intended to ensure that these policies, procedures, and regulations are followed. Employees are required to the best of their efforts to comply with these requirements and are obligated, as a term and condition of employment to bring issues of potential noncompliance to attention of the Vice President of Human Resources so that AerSale may take prompt and effective corrective action. Employees may also contact the **Ethics Monitor** in Coral Gables at by email at ethics@aersale.com, or by mail at Attention: Ethics Department or AerSale's General Counsel in Coral Gables by email at legal@aersale.com, or by mail at Attention: Legal Department.

As part of this commitment, this provides an additional avenue for employees, contractors, and vendors to raise concerns they may have, in addition to already existing methods of communication, reporting or complaint resolution. This reporting system does not replace the other methods employees have traditionally used to communicate with AerSale but adds another avenue, inclusive of the ability to make anonymous reports.

Examples of the possible use of the Ethics Hotline (email) include reporting concerns relating to the integrity of AerSale accounting, internal accounting controls or auditing matters, ethical business or personal conduct, integrity, or violations of law.

Other Policies For Reporting Concerns Outside The Ethics:

AerSale has an open door on communication. Any employee who has a concern involving a human resources issue, including, but not limited to issues regarding treatment of or by a co-worker, supervisor or manager, issues related to scheduling of time off, leave, pay, or day to day employment related concerns, should address these concerns with their supervisor, manager or Human Resources. The employee must report any concerns related to allegations or discrimination, harassment, or retaliation to Human Resource regardless of whether these are also reported to supervisors and managers.

Concerns involving financial reporting or issues or concerns which may implicate regulatory or financial compliance issues should be reported to the Ethics Hotline (email), the Human Resources Department or Corporate Counsel.

Safeguards:

Retaliation- AerSale's policies prohibit retaliation against any individual who in good faith reports conduct, which may be inappropriate or unlawful. Employees are also protected against retaliation for participating in an investigation of inappropriate/unlawful conduct. Retaliation against an individual for reporting any such conduct or for participating in an investigation of a claim of such conduct is a serious violation of and will be subject to disciplinary action, up to and including, termination. Retaliation protection not only applies to the Ethics Hotline (email) but to all channels of communication as mentioned, available to complain or report concerns.

Confidentiality- The Ethics Hotline (email) is managed by the legal department, who gathers information and reports and provides to designated members of AerSale's management. This reporting system is confidential, if you wish to remain anonymous, and if you indicate so when using the Hotline (email).

Please note that the information provided in a Hotline (email) report may be the basis of an internal and/or external investigation by AerSale into the issue being reported. It is possible that as a result of the information provided in a report, the reporter's identity may become known to us during the course of an investigation.

Anonymous Allegations- This allows employees, at their own option to remain anonymous. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources

Malicious Allegations- If someone is found to make a malicious allegation, it may result in disciplinary action.

Procedure:

Reporting- anonymous reports to the Ethics Hotline (email) is intended to be used predominantly for serious and sensitive issues which involve potentially unethical or illegal conduct. You should report these by completing a Complaint Form available on: employee portal and/or by contacting the Ethics Monitor in Coral Gables by email at ethics@aersale.com, or by mail at Attention: Ethics Department or AerSale's Corporate Counsel in Coral Gables by email at legal@aersale.com, or by mail at Attention: Legal Department.

Timing- The earlier a concern is raised the quicker AerSale is able to investigate and take action if appropriate.

Back Up Information: Although an employee is not expected to prove the veracity of an allegation made in good faith, the employee raising the concern should provide any back up information that supports the nature of their concern.

Anonymous Feedback- The amount of contact between the individual submitting a report and those investigating the concern will depend on the nature of the issue, the clarity of the information provided and whether the employee remains accessible for follow-up. AerSale may have questions for the employee making a report (the reporter); in these cases, the investigator may seek further information from you. Depending on the circumstances, AerSale may provide limited information on the outcome of the investigation to the individual making the concern known. However, information will not include a summary of the investigation, nor will it disclose the nature of information provided by others.

We take pride in conducting our business with integrity and responsibility so as to establish long-term beneficial relationships with our customers, employees, suppliers, financiers, and shareholders.

CLOSING

CONTACT

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