

AIR LEASE CORPORATION

WHISTLEBLOWER POLICY - SUPPLEMENTAL

Effective May 3, 2017

The Board of Directors of Air Lease Corporation (the “Company”) has adopted this Whistleblower Policy (the “Policy”) to make it clear that the Company will not take any action that may impede any potential whistleblower from communicating with the Securities and Exchange Commission (the “SEC”) or any other federal, state or local governmental agency or commission (a “Government Agency”) as to any similar whistleblowing activity that may be protected by applicable law. To the extent the terms of any employment, severance, separation, release, confidential information, restrictive covenant or any other agreement or policy of the Company or any of its affiliates of any type (collectively, the “Employee Agreements”) conflict with or are not consistent with the terms of this Policy, the terms of each Employee Agreement are hereby amended to conform to the terms of this Policy. All Employee Agreements will be interpreted in a manner that is consistent with this Policy.

Pursuant to this Policy, and notwithstanding anything in any Employee Agreement:

- Nothing in any Employee Agreement limits any individual’s ability to communicate directly with and provide information, including documents, not otherwise protected from disclosure by any applicable law or privilege to the SEC or any other Government Agency regarding possible legal violations, without disclosure to the Company;
- The Company may not retaliate against any individual for any such activities;
- Nothing in any Employee Agreement requires any individual to waive any monetary award or other payment that any individual might become entitled to from the SEC or any other Government Agency; and
- Nothing in any Employee Agreement precludes any individual from filing a charge of discrimination with the Equal Employment Opportunity Commission or a like charge or complaint with a state or local fair employment practice agency; provided, however, the individual will not be entitled to receive a monetary award or any other form of personal relief from the Company in connection with any such charge or complaint that any individual files or that is filed on the individual’s behalf (the foregoing collectively, the “Whistleblower Protections”).

The officers and employees of the Company will take all reasonable measures to contact any individual covered by or party to any Employee Agreement and make them aware of this Policy and the Whistleblower Protections. All individuals covered by or party to any Employee Agreement should be provided with a copy of this Policy.