ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

Welcome to AerSale, Inc.’s (“AerSale”) Anti-Slavery and Human Trafficking Statement published in November 2019. This statement is made under section 54, part 6 of the Modern Slavery Act 2015, United Kingdom (“MSA”) and outlines the steps taken by AerSale to prevent modern slavery and human trafficking within AerSale and to ensure it does not take place in our business and supply chains. The terms ‘modern slavery’ and ‘human trafficking’ shall have the same meaning given to such terms under the MSA.

Please feel free to contact us at legal@aersale.com with any comments, queries or suggestions regarding our statement. We welcome dialogue with all colleagues, customers and stakeholders who are interested in this topic.

Structural Organization

A global aviation leader celebrating its 10-year anniversary, AerSale is an aftermarket provider of used commercial aircraft, engines and components, in addition to offering a broad range of maintenance, repair and overhaul (MRO) and engineering services for commercial and governmental aircraft and components. AerSale also offers asset management services to owners of end-of-life aircraft and engine portfolios. With its corporate headquarters in Coral Gables, Florida, AerSale maintains offices and operations in the United States, Europe and Asia. For the purpose of this statement, any reference to AerSale includes all of its affiliates and subsidiaries wherever located. Further information regarding AerSale may be found at AerSale’s website www.aersale.com.

As of November 2019, AerSale employs more than 500 employees globally. AerSale expects all employees to be treated with dignity and respect. Given the nature of the products and services we provide, our workforce is typically specially skilled and in long-term employment.

AerSale relies on a global supply chain to design, develop and manufacture the components of our product portfolios and to support our operations, facilities and services network. AerSale works directly with suppliers from across the globe which includes engineering and manufacturing organizations as well as other service providers.

Exposure to modern slavery and human trafficking risk

AerSale’s approach to identifying and assessing modern slavery risk is embedded within our broader risk management approach. AerSale has considered its exposure to slavery and human trafficking risk, taking into account the nature of AerSale’s business activities and the application of company policies, and considers AerSale’s exposure to modern slavery and human trafficking risk to be low.

Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor, and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. AerSale has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all of our business dealings and relationships and to implementing and
enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our business or in any of our supply chains.

AerSale is also committed to ensuring that there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the MSA. AerSale expects the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we endeavor to include specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to this same high standard.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners. For the purpose of this section, human trafficking is included under the concept of modern slavery.

Next steps

As part of our commitment to eliminating modern slavery and human trafficking, we understand and recognize that our own circumstances and those of our suppliers are constantly evolving and we will continue to review our processes to ensure that they are fit for purpose. Such review will include, but is not limited to:

- Targeted modern slavery and human trafficking training for all staff who work in high risk areas;
- Regular updates to AerSale’s management and directors on modern slavery and human trafficking so that directors and other key personnel understand their role and accountability in eradicating slavery and human trafficking from our business and supply chains;
- Ensuring that all new supplier contracts and those coming up for renewal contain Modern Slavery clauses; and
- Continuing to work with other companies to share knowledge, learning and best practice.

Responsibility

AerSale’s General Counsel has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries in relation to it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Notwithstanding the foregoing, management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery and human trafficking in supply chains.

For and on behalf of AerSale, Inc.

Nicolas Finazzo
Chairman & Chief Executive Officer

December 4, 2019