



WORKING WITH AVOLON

**The Avolon
Business Partner
Code of Conduct**

A MESSAGE TO OUR BUSINESS PARTNERS

At Avolon, we take pride in not just what we do, but who we are.

Our corporate values – embodied in the acronym **TRIBE** (Transparency, Respect, Insightfulness, Bravery, Ebullience) – form the basis of what we stand for. They govern how we run our business, how we interact with each other and even whom we choose to work with.



We expect that any third party who works with us or on our behalf, from those working with our aircraft to those supporting our business operations (our “Business Partners”), will share our commitment to ethical business practices and uphold the same high standards that we do.

To understand better, please begin by reading this Business Partner Code of Conduct (“Code”). Let us know if you have any questions on our Code. We would ask you then to immediately inform us if you are aware of any conduct that contradicts it, on either our behalf or yours. This Code is important to Avolon and will frame all our business relationships. Our reputation depends on each of us living these standards and practices, by doing what is right in every decision and interaction.

By fulfilling these commitments, you will be doing your part to stay true to our **TRIBE**: the key to **Working With Avolon**.

Onwards and Upwards,

Andy Cronin
CEO Avolon

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BE COMMITTED

Operating With Integrity

At Avolon, we work hard to promote the highest standards of ethical conduct. As one of the most trusted partners of airlines, Original Equipment Manufacturers and aviation investors around the world, it's what our shareholders demand. Our Business Partners are a vital part of this success. That's why, when conducting business with us or on our behalf, we expect you to operate with the utmost integrity and to make sure *your* Business Partners do so as well.

Complying With Laws and Regulations

We only work with those who are committed to the same standards we are. We expect you to conduct your business in full compliance with all applicable laws, regulations, guidelines and corporate codes (including this one). If you find that more than one law or regulation applies, follow the stricter standard. Also, use good judgment and ask questions whenever you're unsure about the right thing to do.

Asking Questions and Reporting Concerns

If you see or suspect any violation of the law or this Code in connection with the work you do for us, speak up. You can report concerns to your Avolon contact or through the Avolon Hotline via one of the following numbers:

- Ireland – 1800 903 350
- U.S. – 844 958 1472
- China – 400 120 3057
- Hong Kong – 800 906 179
- Singapore – 800 852 6920
- Brazil – 0800 724 8322

When you speak up, know that you can do so without fear. We prohibit all forms of retaliation against anyone who comes forward in good faith, and we will make every reasonable attempt to ensure that concerns are addressed appropriately.



BE PROTECTIVE

Diversity and Inclusion

Avolon's Diversity and Inclusion vision is to sustain an open environment where people can bring their true selves to a workplace which cultivates and hears all views whilst recognising people based on their merits, without bias. We expect our Business Partners to be aligned in placing a strong emphasis on progressing such initiatives within their own business.

Company Assets

In the course of your business with us, you may at times be entrusted with Avolon assets, including funds, facilities, equipment, information systems, intellectual property and confidential information. Do your part to protect these assets from loss, damage, theft, waste and improper use. Apply good judgment and speak up if you see or suspect any acts of fraud by either party while working with us.

Confidential Information

The creation and protection of confidential information is critical to our business. Always be vigilant in protecting our confidential information, customer intelligence and intellectual property against intentional and inadvertent disclosure now or in the future. Keep it secure, limit access to those who have a business need to know it, and only use it for authorised purposes.

Accurate Recordkeeping

The accuracy and completeness of our business and financial records is essential to making informed decisions and engendering trust. Do your part by creating and maintaining documentation that demonstrates compliance with all applicable laws, regulations, guidelines and corporate codes. Never alter, falsify, tamper, remove or destroy information on any record or document, and never lie to anyone when working on our behalf.

Health and Safety

Ensuring safety is a basic part of everything we do. We make every effort to ensure workplace safety. Uphold a similar level of commitment. Put in place your own health and safety practices and always comply with any relevant international, national and local laws and regulations. If an incident occurs which threatens the health, safety or security of people in or around the places we operate, notify the appropriate authorities immediately.

BE RESPONSIBLE

Conflicts of Interest

We expect that business decisions affecting our Company will be objective and impartial. Avoid any situation or relationship that creates or appears to create a potential conflict between your interests and Avolon's. Conflicts could arise out of outside employment, personal relationships, past and future business relationships, financial interests, board memberships or business ventures and they may be actual, potential or a matter of perception. Since these situations are not always clear-cut, if you become aware of a potential conflict of interest, disclose it immediately to your Avolon contact or the Avolon Hotline and seek guidance to determine the appropriate course of action.

Gifts and Entertainment

We recognise that a modest gift may be a thoughtful "thank you" or a meal may be an appropriate setting for a business discussion. However, we never allow the exchange of gifts and entertainment to influence our actions or the actions of others. As our Business Partner, only provide or accept items when they are reasonable, customary and have no influence on the decisions you or the recipients make. Also, be sure offers are infrequent, of nominal value and never take the form of cash.

Data Privacy

We respect the personal data of others and expect you to do the same. Follow all applicable laws in collecting, accessing, using, storing, sharing and disposing of personal data. Only process it for legitimate business purposes. Follow applicable data protection laws, observe adequate security measures and handle personal information with care to avoid destruction, loss, alteration or unauthorised access. If you become aware of any data breach, make your Avolon contact aware immediately.



BE ACCOUNTABLE

Insider Trading

Through your work with us, you may learn of confidential information about Avolon or other publicly traded companies that is not available to the public at large. We never trade securities while aware of such material nonpublic information or disclose such information to others so that they may trade (“tipping”). These are both illegal forms of insider trading. Help uphold our standards by never engaging in these practices and by speaking up if you become aware of any potential violations.

Anti-bribery and Corruption

Avolon is committed to doing business in a way that is fair, transparent and benefits everyone involved. We never pay bribes, kickbacks or facilitation payments, at any time for any reason. We partner with those who share these values. Never offer, give or accept anything of value to get business, keep business or gain an unfair advantage. Operate in strict compliance with these standards and maintain accurate records of all transactions. Lastly, never offer *anything* of value to a government official or employee unless you are certain that it would be consistent with local laws and regulations.

Fair Competition

We believe in free and open competition and never engage in improper practices that may limit competition. We also only work with those who never look to gain competitive advantages through unethical or illegal business practices, and follow all antitrust and competition laws. Never agree or appear to agree, with competitors or others to restrict trade or limit production; do not discuss pricing, bidding or costs with your competitors.



Anti-money Laundering

Money laundering is a global problem with far-reaching and serious consequences. Involvement in such activity would undermine our integrity and damage our reputation. As our Business Partner, never knowingly, directly or indirectly, participate in any money laundering scheme, contravene any applicable law relating to money laundering or transact business with or provide assistance to persons engaged in terrorist or criminal activities. Further, if you come across any suspicious transactions or activities, speak up.

Global Trade

We have global operations that support a worldwide customer base, and we comply with all export control, economic sanctions and customs laws that regulate the cross-border transfers of goods and technologies. We also are committed to promoting human rights, so we work to understand and manage our human rights impact across the globe. Know, understand and follow the requirements that apply to your products, services and technologies in regard to trade and with regard to human rights in everything you do.



KEEP IN MIND

We expect you to join us in pursuing these common goals of integrity and ethical business practices. If you see or suspect any violation of the law or this Code, speak up using the details set out in the Code. If you are unsure of any requirements within this Code or have any other questions, please reach out to your Avolon contact or email Business-Integrity@avolon.aero.