

AerFin



Whistleblowing Policy

Purpose

At AerFin we strive to conduct our business with integrity and promote a culture of transparency and accountability where people feel able to *speakup* about unethical or potentially illegal issues. Fostering an open culture, where serious concerns are reported early to management through whistleblowing helps us to together reduce the risk of any wrongdoing at AerFin and also helps to protect our fellow colleagues.

The Whistleblowing Policy is specifically designed to provide a clear and safe process for employees (and other workers) to raise genuine concerns about serious wrongdoing or misconduct. It ensures that serious concerns can be reported confidentially in a safe and supportive environment without any fear of retaliation, and that they will be taken seriously by AerFin, investigated appropriately, and resolved fairly.

Depending on the nature of the wrongdoing or misconduct concern, it may be more appropriate for you to talk to your line manager in the first instance, or refer to AerFin's **Grievance Procedure**. Further guidance as to which channel is most appropriate in different situations is set out in **Scope** section below.

AerFin Principles

At AerFin, we are committed to:

- Integrity and transparency: encouraging the reporting of genuine concerns.
- Protection: ensuring no one suffers retaliation, discrimination, or disadvantage for raising a concern in good faith.
- Confidentiality: handling all disclosures sensitively and securely.
- Fair investigation: ensuring concerns are assessed promptly and impartially.
- Respect: for applicable data protection legislation and the privacy interests of all persons.

Policy Scope

This Whistleblowing Policy applies to all employees, contractors, agency workers and consultants who work with or on behalf of AerFin globally. When applied outside the United Kingdom, AerFin shall also manage this policy in accordance with local applicable laws.

When is the Whistleblowing Policy not applicable?

Whistleblowing shall not be used to report regular day to day matters of dissatisfaction, nor shall it be used to deliberately discredit colleagues. If unsure of the correct reporting channel, feel free to ask a member of the People team or Legal team which route is the most appropriate in the circumstances.

1. If you have a complaint relating to your own **personal** circumstances, such as the way you have been treated at work, we encourage you to raise this in the first instance with your line manager, or, if that is not appropriate, discuss it with any member of the SLT.
2. If management are unable to resolve a personal complaint (or it is not appropriate to speak to them) you may use the process set out in the **Grievance Procedure** or **Anti-harassment and Bullying Policy** (as appropriate) unless you feel that a matter has not been correctly addressed in accordance with such AerFin procedures and policy, in which case it may be appropriate to use the process set out in the Whistleblowing Policy.
3. If your concern is one about internal process, or that an AerFin standard operating procedure (SOP), has not been correctly followed (without any willful wrongdoing) in the first instance you should raise a **Non-Conformance Report** (NCR) through the **AerFin Quality intranet** page.

What is Whistleblowing?

Whistleblowing means the reporting of suspected wrongdoing or dangers in relation to certain activities. Examples include reporting concerns relating to:

- Criminal offences, such as bribery or tax evasion or breaches of sanctions laws;
- Breaches of certain company policies or our code of conduct;
- Health and safety risks or dangers to the public or the environment;
- Financial misconduct, fraud, or fraudulent misrepresentation;
- Any other violations of law (beyond those already identified above);
- Unlawful disclosure or obtaining of confidential information; or

Concealment or deliberate cover-up of any of the above.

In any situation of this nature, you are encouraged to report it using the procedure set out in this policy.

How to Raise a Concern

If you have a concern, you should raise it as soon as possible through either your line manager, team leader or business partner in the People Team. However, where you feel it is inappropriate to go through one of those channels, you should contact one of the AerFin colleagues listed in **Contacts** below.

Alternatively, you may raise concerns **anonymously** via www.aerfin.com/whistleblowing. Note, however, that if a disclosure is made anonymously we will be unable to provide you with feedback on how it is being addressed.

Finally, if you have concerns regarding the internal channels available, you may formally raise the whistleblowing concern with AerFin's **Chairman** at lucas.mollan@erfin.com.

When raising a concern, always provide as much detail as possible, including relevant facts, dates, and any supporting evidence as this will help us to address it more effectively.

Confidentiality

All reports will be treated confidentially. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

If the identity of the whistleblower is disclosed, the information shall not be distributed externally unless disclosure is required as a matter of law in relation to a police investigation or judicial proceedings.

Investigation Process

- Your concern, once raised in writing, will be acknowledged promptly.
- The matter will be reviewed and an initial assessment made to determine next steps. We may arrange a meeting with you to discuss your concerns; you may be accompanied by a colleague to any such meeting, if preferred.
- A formal investigation may be launched, involving relevant specialists as required.

Important to note that, depending on the circumstances, a member of the AerFin Board of Directors may conduct the investigation.

The individual who has raised the concern will be kept informed of progress and timescales, where appropriate and possible.

If, at the end of the process, you are not happy with the way in which your concern has been handled, you can raise this with AerFin's General Counsel or Chief People Officer or, alternatively, you may contact the Chairman of the AerFin Board (contact details below).

Protection and Support

A whistleblower will not be subject to any form of retaliation, dismissal, or detriment, even if the concern proves unfounded. Any individual who victimises or retaliates against someone for raising a concern will be subject to disciplinary action. However, knowingly making a false or malicious allegation is a serious disciplinary matter.

Support and guidance for whistleblowers is available from those who the concern was raised with (i.e. People Team, Legal team or AerFin Board, via the Chairman).

If the whistleblowing amounts legally to a '*qualifying disclosure*' of information (eg., of a criminal offence, breach of law, health & safety risk) and also amounts to a "*protected disclosure*" then, where English law is applicable to the context, special legal protections for the worker shall apply.

Amendments

This policy does not form part of any employee's contract of employment and may be amended at any time to ensure its effectiveness and continued alignment with legal and ethical standards and best practice. It shall be reviewed at least annually.

Key Contacts

General Counsel	Tamsin Hayward Tamsin.hayward@aerfin.com +44 (0) 7484 966582
Chief People Officer	Jo Rival Jo.rival@aerfin.com +44 (0) 7867 336617
VP Legal	Naomi Mattock Naomi.mattock@aerfin.com +44 (0) 7552879599
Head of People and Talent	Helena Cole Helena.cole@aerfin.com +447484912931
Chair of the Board of Directors	Lucas Mollan lucas.mollan@aerfin.com
Compliance (Anonymous reporting only) (Automatically forwards to GC, CPO & Chairman)	www.aerfin.com/whistleblowing .