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	SUBJECT: SPEAKING UP AND NON-RETALIATION POLICY		

PURPOSE

The purpose of this Speaking Up and Non-Retaliation Policy (the “Policy”) is to ensure that employees feel comfortable speaking up when they see or suspect illegal or unethical conduct without fear of retaliation and to define the process for assessing and investigating allegations of misconduct.

SCOPE

This Policy applies to AAR CORP. and all subsidiaries, operating units, joint ventures or other affiliates controlled by the Company (collectively, the “Company” or “AAR”), as well as to all directors, officers and employees of the Company.

POLICY


AAR is committed to maintaining the highest ethical standards and ensuring a safe and inclusive work environment for all employees. It is AAR’s policy to promote open communication and believe that all employees should have a safe and confidential means to report concerns, complaints, or potential violations of the law, AAR’s Code of Conduct or Company policies. AAR further aims to promote transparency, fairness, and accountability in investigating such reported concerns. By doing so, we demonstrate our commitment to maintaining a safe, ethical, and inclusive workplace.

Responsibilities

Employees: All employees have an obligation to promptly and appropriately report to AAR any suspected violations of AAR’s Code of Conduct or other Company policies, laws, or regulations (hereinafter collectively referred to as “compliance issues”). Employees shall cooperate fully with any Company-designated investigators and provide truthful information. Any person who fails to cooperate with a Company investigation or who provides false or misleading information to Company investigators will be subject to disciplinary action up to and including possible employment termination.

Employees shall maintain and retain all potentially relevant records (e.g., email, instant messages, files, notes, photographs, recordings) relating to any ongoing investigations they have been notified of and providing them to the Company. Any person who knowingly destroys any potentially relevant records or information will be subject to disciplinary action up to and including the possible termination of employment. (See AAR’s [Records Preservation/Non-Destructive Notice Policy](#) for further details.)

Managers: Managers shall strive to create and maintain a working environment where employees are encouraged to report compliance issues. Managers shall become familiar with the types of improprieties that might occur within their areas of responsibility and be alert for any indication of irregularity, crime, fraud, or Code of Conduct violation. Managers who receive a report of a compliance issue are required to treat such concerns or allegations with discretion, and to treat the employee who raised the concern

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with respect without any type of retaliation for having done so in good faith. Managers shall maintain strict confidentiality about potential issues raised to them and sharing information only to those with a need to know in order to properly investigate and remediate the matter. Managers shall promptly report any concerns or issues reported to them to appropriate Company resources for investigation and shall promptly report any potential compliance issues they become aware of themselves.


AAR’s Investigation Committee: Members of the Investigation Committee include AAR’s Chief Human Resources Officer, AAR’s General Counsel and AAR’s Chief Ethics and Compliance Officer. The Investigation Committee is responsible for ensuring investigations into allegations of Code of Conduct violations are handled in a fair and objective manner. The Investigation Committee shall ensure findings from such investigations are communicated to appropriate parties for consideration of whether corrective action and/or discipline is warranted. The Investigation Committee shall ensure that confidentiality is maintained to the fullest extent possible for all information connected to any such investigation. The Investigation Committee shall meet monthly to discuss recent hotline reports, the status of ongoing investigations, and findings with respect to completed investigations.

How to Report

Employees should report suspected misconduct to their supervisor, local management, human resources representative, the Compliance Department, the Law Department, or through AAR’s EthicsPoint Hotline. The hotline allows for confidential (and anonymous if so chosen) reporting, is available 24 hours a day 7 days a week, in multiple languages via the easy-to-use options below:

<ul style="list-style-type: none"> • Online at http://www.aar.ethicspoint.com • Toll-free at: <ul style="list-style-type: none"> ○ 855-822-9536 (USA and Canada) ○ 855-350-9393 (Canada–Français) ○ Additional toll-free options for other locations, visit http://www.aar.ethicspoint.com and click on “Make a Report.” • Mobile: aarcorp.navexone.com 	<p>Scan QR Code below</p> 
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The hotline is administered using a third party website and telephone line staffed by an independent third party vendor of confidential hotline reporting. The hotline is not equipped with caller ID, recorders, or other devices that can identify or trace the phone number from which you are calling or the internet address that you are using. Upon receipt, hotline reports are promptly provided from the vendor to members of the Investigation Committee for evaluation. Additionally, a summary of AAR’s Ethics Hotline activity as well significant compliance-related activity is provided to AAR’s Audit Committee of the Board of Directors on a quarterly basis.

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When you submit the report via the hotline, Report Key is issued. Please write it down and keep it in a safe place. Use the Report Key along with the password of your choosing to return to EthicsPoint to follow up on the status of your case. If you decide to remain anonymous, you can provide a personal email within EthicsPoint to receive follow-up responses from AAR throughout the investigation process. Such email communication will be maintained by the vendor and AAR will not receive access to this email address.

You will receive a confirmation response via the hotline within 48 hours of your submission, indicating AAR has received your report. If you choose to remain anonymous, any follow up requests, including if additional information is necessary to adequately investigate your concerns, will be made through the hotline. You will be informed via the hotline upon the completion of any investigation, as applicable but given the confidential nature of the investigation, findings generally cannot be shared with the reporter.


How Concerns are Investigated

AAR shall appropriately and objectively review all reported compliance issues in a timely manner. When an alleged or suspected Code of Conduct violation is reported, an initial assessment will be made by AAR’s Investigation Committee to determine whether an investigation is appropriate and the form it should take. Some concerns may be resolved without need for an investigation. If such a determination is made, the appropriate individual shall document the basis for the conclusion.

Any allegations calling into question the integrity of the Company’s financial books and records, that concern activities that could result in a significant loss or penalty to the Company, or that allege misconduct by a member of senior management will be promptly reported to the Audit Committee. The Audit Committee shall determine if such investigation should be directed by the Audit Committee. If the Audit Committee decides to lead the investigation, the Audit Committee shall be the Investigative Lead, and as provided in the Audit Committee Charter, may retain its own legal counsel to lead and provide legal advice regarding such investigations.

All other investigations, if deemed warranted, shall be assigned to and conducted by a lead investigator from the appropriate department (i.e., Human Resources, Legal, Compliance, etc.) (“Investigative Lead”). When deemed necessary to ensure fairness and impartiality, an Investigative Lead may be appointed from another, unaffected department or business unit of the Company or include assistance from external investigators. Additionally, if a matter is regarded as sufficiently serious or where expertise to adequately investigate an issue does not exist internally, external investigators, forensic accountants or third-party vendors will be utilized as necessary and appropriate, after consultation with AAR’s General Counsel.

The Investigative Lead will conduct interviews with relevant individuals, review documentation and other evidence, and take any necessary steps to gather information. The collection or processing of

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personal data must comply with applicable law. The Investigative Lead shall contact the Law Department when collecting or processing personal data of employees outside the United States.

The Investigative Lead may utilize internal resources such as Law Department subject matter experts, HR, Corporate Audit, IT, and Finance. The Investigative Lead shall regularly inform appropriate members of AAR’s Investigation Committee when significant new facts are discovered or major developments occur.

All investigations will be conducted in a confidential, impartial, and objective manner. For any investigations that involve, or are likely to involve civil litigation, the Investigative Lead shall coordinate with AAR’s General Counsel, or his or her designee to anticipate AAR’s potential participation in civil litigation.


Remediation

Where allegations of misconduct are confirmed, the Investigative Lead, after consulting with relevant subject matter experts shall ensure that both interim and final remedial action is taken and documented. The Investigative Lead shall report to AAR’s Investigation Committee the results of any investigation into Code of Conduct violations, including key findings and any remedial actions.


The Investigative Lead shall coordinate with Human Resources and/or AAR’s General Counsel, or his or her designee(s), as applicable, to ensure that any contemplated remedial action (e.g., discipline) taken with respect to an employee as a result of confirmed misconduct is consistent with the law, AAR’s [Code of Conduct](#) and this Policy.

AAR’s Safety Management System

AAR’s Safety Management System (“SMS”) is a top-down driven program to ensure that all departments of our business establish an approach to identifying hazards/risks and managing them to an acceptable level of Safety. AAR’s SMS encompasses our Business Plan and Strategy, Maintenance Operations, Quality Assurance, Quality Control, Compliance, Environmental Health and Safety, Planning, and Technical Services. Our SMS seeks to contain or mitigate risks before accidents and incidents occur proactively. Our SMS concerns organizational safety, including aviation safety work-related Health & Safety and quality.

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Options for reporting SMS events:

<ul style="list-style-type: none"> • Use Report Something Link • Contact our Corporate Safety Hotline at: <ul style="list-style-type: none"> ▪ SMSReport@aacorp.com ▪ +1-630-227-7585 • You may also report concerns directly to your supervisor or your safety manager. 	<p>Scan QR Code below</p> 
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Non-Retaliation

The Company shall not tolerate any retaliation, retribution or harassment against anyone who reports an actual or potential violation of a compliance issue he or she reasonably believes to be illegal or unethical, or against anyone who otherwise assists in an investigation, where with respect to such investigation, such information or assistance is provided to, or the investigation is being conducted by, AAR management, a Federal regulatory or law enforcement agency, or a member or committee of Congress. Employees who in good faith make a report or participate in an investigation or proceeding under this Policy, however, remain subject to the same standards of performance and conduct as other employees.

Anyone who conducts or condones such retribution, retaliation or harassment in any way will be subject to discipline, up to and including termination. A manager who becomes aware of retaliation committed against, or by, his or her subordinates, and fails to alert Human Resources in a timely manner will be subject to discipline, up to and including termination.

Any negative action that would deter a reasonable employee in the same situation from making a complaint qualifies as retaliation. Retaliation can come in many forms, including but not limited to intimidation, threats, discharge or other actions that negatively impact the employee’s terms and conditions of employment. Allegations of retaliation will be thoroughly and expeditiously investigated, with appropriate disciplinary actions taken against any employee who violates the Company’s policy against retaliation.

Compliance

AAR employees are expected to comply fully with the letter and the spirit of this Policy. Failure to comply with this Policy shall be considered grounds for disciplinary action up to and including termination of employment. If you have any questions regarding the compliance to this Policy, you should contact the Law Department.

Revisions: This Policy replaces AAR’s Ethics Hotline Policy (Policy No. 1.14.001) and AAR’s Global Investigations Policy (Policy 1.18.001) as of July 31, 2023.